



An  
Bord  
Pleanála

## Inspector's Report

### ABP-305015-19

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<b>Development</b>	Expansion to the recreational, sports and amenity facilities at Renville Park & Renville West. A Natura Impact Statement has been lodged with the planning application.
<b>Location</b>	Renville West, Co. Galway.
<b>Planning Authority</b>	Galway County Council
<b>Planning Authority Reg. Ref.</b>	181422
<b>Applicant(s)</b>	Renville Sports Project Committee, on behalf of Oranmore Maree GAA Club.
<b>Type of Application</b>	Permission
<b>Planning Authority Decision</b>	Grant
<b>Type of Appeal</b>	Third Party
<b>Appellant(s)</b>	1. James Mansfield and others 2. Pat and Bernie Canning and others 3. Michael Fleming
<b>Observer(s)</b>	None

**Date of Site Inspection**

10<sup>th</sup> September 2019

**Inspector**

Irené McCormack

## 2.0 Site Location and Description

- 2.1. The appeal site is in a rural area, located c.2.4kms southwest of Oranmore village centre in the townland of Rinville West at the eastern end of the Rinville peninsula. The site is located directly to the east of Rinville Park and Woodland. On the western end of the peninsula is Galway Bay Golf Resort and Country Club, the Marine Institute, and to the south is Galway Bay Sailing Club.
- 2.2. The site is undulating in nature and consists of open grasslands interspersed with hedgerows. The site is elevated above the landscape to the south and views can be had from the more elevated part of the site towards the Galway Bay complex.
- 2.3. The site is 13.75ha in area. Access to the site currently via an existing entrance off the L-8104 Maree Road with agree via the L-81043 Rinville Road.

## 3.0 Proposed Development

- 3.1. The proposed development will comprise of the following:
  - 3 no. full size grass playing pitches (pitches 1,2 & 4).
  - 1 no. all weather synthetic planning pitch (pitch no. 3).
  - 3 no. warm up/training areas.
  - Site lighting, together with 6 no. 21m high floodlighting masts to both pitches 2 and 3 (12 no. masts in total).
  - Retractable netting system located behind each goals of the 4 playing pitches.
  - A covered terrace for standing/Seating to pitch no. 1.
  - A single-storey machinery building.
  - A hurling wall.

In addition to the following “community gain” facilities:

A public playground area complete with associated equipment.

- A looped walkway through the site and connectivity to existing amenity walkways at Rinville Park.
- A single storey toilet block.

The works will provide for 248 car parking spaces and 8 coach parking spaces to service the site and the wider area. Access and egress to the site is proposed via a new access junction off the L-81043 Rinville Road, located 70m northwest of the existing L-81043 /L-8104 Maree Road junction. A second vehicular access to serve the proposed machinery shed is proposed onto the L451015 local road, to the north of the site.

- 3.2. The development seeks to provide facilities for the amalgamated Oranmore/Maree GAA Club. The gross floor area of the proposed works is: Toilets 50sqm, machinery building 163sqm.
- 3.3. A Natura Impact Statement, Ecological Impact Assessment, Visual Impact Assessment, Traffic and Transport Assessment, Archaeological Impact Assessment, Engineering Assessment and Floodlighting Impact Assessment accompanied the planning application. Unsolicited further information was submitted on 5<sup>th</sup> July outlining site entrance and access road details.

## 4.0 Planning Authority Decision

### 4.1. Decision

- 4.1.1. The planning authority decided to grant permission on 11<sup>th</sup> July 2019, subject to 15 conditions. The following conditions are of note:

**Condition no. 3** refers to the use of the all-weather pitches not extending beyond 22.00 hours

**Condition no. 4** refers to the operation of the floodlights between 0900- 2200 Monday to Saturday and between 0900 -2100 on Sundays.

**Condition no. 5** refers to the design and orientation of the floodlights as per details submitted on 11<sup>th</sup> October 2018.

**Condition no. 9** requires a Construction Management Plan to be submitted and agreed prior to the commencement of the development.

**Condition no. 11** refers to the completion of a Stage 2 Road Safety Audit prior to the commencement of development.

**Condition no. 12** requires a Traffic Management Plan to be submitted and agreed prior to the commencement of the development.

**Condition no. 13** refers to public lighting design

**Condition no. 14** refers to works to protect the Tureen Stream in order to protect the wider Galway Bay Complex.

**Condition no. 15** refers to 15m buffer zone between the development and the Recorded Monument GA095-130 Ringfort.

## 4.2. Planning Authority Reports

### 4.2.1. Planning Reports

The Planner's reports are summarised as follows:

- The initial notes the site location and that the site is not in a flood zone, the large number of submissions on file and the report from the Roads Dept. in relation to sightlines and Road Safety Audit. It is noted that Galway County Council and Galway City Council are the joint owners of Rinville Park. The report recommends further information in relation to archaeological investigations including geophysical survey and test trenching. The report also requires the NIS to be revised to incorporate a site-specific construction management plan and a winter bird survey be carried out.
- The response to further information was deemed significant and the applicant was requested to re-advertise.
- The final report notes the information submitted by the applicant and regards the proposal as acceptable subject to conditions.

### Other Technical Reports

*Roads Department* – In their initial report dated 4<sup>th</sup> December 2018 from the Roads Department requested the applicant provide revised drawings/reports implementing the recommendations contained in the Road Safety Audit. The planners report refers to Roads Department reporting back following review of the further information response recommending conditions be attached in relation to Road Safety Audit a traffic

management plan and public lighting. There is no written second report from the Roads Department on file.

*Facilities Unit, Corporate Services* - In their report dated 14<sup>th</sup> November 2018 the facilities unit set out no objection to the development but requires a number of matters such as access, landscaping and the protection of a watermain to be agreed in advance of development works.

#### 4.3. **Prescribed Bodies**

*Department of Culture, Heritage and Gaeltacht* - In their final report dated 8<sup>th</sup> July 2019 the contents of the archaeological assessment submitted in response to the further information is noted. It is set out that given the scale, extent and location of the development, it is possible that further subsurface archaeological remains could be encountered during construction. The report recommends a number of conditions to be attached to any grant of planning permission.

In relation to Nature Conservation the Dept. recommend the Tureen stream is fenced off from the works, leaving an adequate buffer distance between any works and the stream to prevent spillages entering the stream.

#### 4.4. **Third Party Observations**

A total of eleven submissions (including a further submission following receipt of significant further information) were received by Galway County Council. The concerns raised include the following: -

- Impact on archaeology
- Traffic safety and road network
- Impact on established right of way
- Impact on ecology
- Reference to flooding in the area and the potential increased risk as a result of the development.
- Impact on residential amenity
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- Visual amenity
- Floodlights and light pollution
- Security and anti-social behaviour
- Recent planning history in the vicinity
- Creeping development pattern

## 5.0 Planning History

Site

None

Surrounding

GCC16/1481 / ABP247936 - Planning permission refused in 2017 to retain and complete agricultural shed consisting of stables, agricultural storage shed/haybarn together with ancillary site works for two reasons -

1. Undesirable precedent in a High Landscape Sensitivity (Class 3) location and the Landscape Conservation and Management Policies LCM1 - Objectives LCM1 and LCM 2
2. Sight distance availability and Traffic Safety

PL. Ref. No. LA1110 - Part 8 planning permission granted by Galway County Council for the extension of Rinville Graveyard to the south-west of the site in 2010.

## 6.0 Policy Context

### 6.1. Development Plan

6.1.1. Galway County Development Plan 2015-2021.

6.1.2. The appeal site is located in a rural area outside of any development boundary. The lands are identified as Class 3 within the Landscape sensitivity and character areas map and have a 'high' landscape value.

DM Standard 12 - Support for facilitating sustainable Rural Enterprise.

## Landscape

Objective UHO9- Ensure that new developments are responsive to their site context and in keeping with the character, amenity, heritage, environment and landscape of the area

Policy LCM 1- Landscape Sensitivity Classification.

Policy LCM 2- Landscape Sensitivity Ratings.

DM 39- Class 3 – restriction on development for, including those with substantiated cases for such a specific location and which are in compliance with settlement policies

- Section 9.9 - Natural Heritage and Biodiversity Policies and Objectives
- Section 9.11 - Landscape Conservation and Management Policies
- DM Standard 40 - Appropriate Assessment.
- DM Standard 41: Field Patterns, Stone Walls, Trees and Hedgerows
- DM Standard 45 - Archaeological Conservation and Preservation.

## Archaeology

- Section 9.6 - Archaeological Heritage.
- Policy ARC 3 – Consolation for developments adjoining archaeological sites
- Policy ARC 4 – Management of Archaeological Sites and Monuments
- Objective ARC 1 - Protection of Archaeological Sites
- Objective ARC 2 –Archaeology and Development Management

Objective ARC 7 –Design and siting in the immediate vicinity of a Recorded Monument.

## Transportation

- DM Standard 20 - Sight Distances Required for Access onto National, Regional & Local Roads

## Community Facilities

Section 10.8 Community Facilities and Services

Objective CF 4 – Sport, Amenity and Recreation



Support and facilitate local communities and sporting organisations in the development of sport and recreational facilities. Support the modest expansion of existing and authorised sporting facilities throughout the County. Seek to develop open spaces throughout the County which will support a range of recreational and amenity activities that provides for active and passive needs.

#### Objective CF 5 – Play Facilities

Support the development of play facilities at suitable locations in the County in accordance with the National Play Strategy Ready Steady Play.

### 6.1.3. Section 10.11 Recreation and Amenity Policies and Objectives

Policy RA 1 – Promotion of Recreation and Amenity - Co-operate with various stakeholders in promoting and developing the recreational and amenity potential of the County and carry out appropriate development as and when resources permit.

Policy RA 2 – Protection of Sensitive Areas -Protect the amenity of scenic and environmentally sensitive areas and promote the knowledge and appreciation of the natural amenities of the County.

#### Objective RA 3 – Recreation Facilities

It is an objective of the Council to develop sport, recreation and amenity facilities in appropriate locations consistent with proper planning and sustainable development in the County and in partnership with local community and sports groups and/or private parties. The modest expansion of existing and authorised sporting facilities throughout the County will be supported

#### **National Policy**

National Planning Framework, (2018)

National Policy Objective 18a

Support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services

## **6.2. Natural Heritage Designations**

- 6.2.1. The site is not located within an SAC or SPA, however the Inner Galway Bay SPA (Site code 004031), is located approx. 380m from the northern site boundary and 360m from the southern site boundary. The Galway Bay Complex SAC (Site code 00268) is located to the immediate north of the site and 360m from the southern site boundary. Cregganna Marsh SPA (Site Code 004142) is located 1.4km east of the site. An NIS was submitted with the planning application.

## **6.3. EIA Screening**

- 6.3.1. On the issue of Environmental Impact Assessment screening, Schedule 5 (10) (b) (iv) requires an EIS to be submitted in the case of “urban development” which would involve an area greater than 20 hectares. I do not consider that the proposed development to be urban in nature. The proposal in this instance is a recreational facility. Most of the land in relation to the proposed development relates to the provision of grass pitches which is a low intensity of use and cannot be considered as urban type development. There are no other projects listed under sub-section 10, sub-section 11 or sub-section 12 of Schedule 5 which relate to the development in question. I therefore do not consider that an EIAR is mandatory in accordance with the Regulations in this instance. Furthermore, I note that the applicant as part of the planning application has submitted a series of environmental reports assessing the potential impact of the proposal on the receiving environment.

Having regard to the nature and scale of the proposed development, the nature of the receiving environment, and to the nature, extent, characteristics and likely duration of potential impacts, I conclude that the proposed development is not likely to have significant effects on the environment and that the submission of an Environmental Impact Statement is not required. The need for environmental impact assessment can, therefore, be excluded at preliminary examination.

## **7.0 The Appeal**

### **7.1. Grounds of Appeal**

- 7.1.1. Three third-party appeal submissions were made in relation to the development.

1. James Mansfield and others, Rinville West, Oranmore, Co. Galway.

The grounds of appeal can be summarised as follows:

#### Traffic

It is set out the road network cannot accommodate the size and scale of the development and the planning report fails to address the inadequacies in the road network and the associated safety and welfare of other road users.

The Traffic and Transport Assessment (TTA) demonstrates inadequate or insufficient monitoring of traffic. It is set out that in order to ascertain traffic volumes a traffic counts should have been taken on L-8104 Maree Road approaching the junction with L-81043.

A Road Safety Risk Assessment should have been carried out in advance of any adjudication on this application.

#### Emergencies

The intensification of traffic on the road network with restricted access could impede frontline responders.

#### Environment , Climate and Health

Pollution – Site drainage appears to enter directly into the Tureen Stream and concern is expressed regarding the risk of effluent from the treatment plant and runoff which may contain contaminants or residue entering the stream and the impact on the highly sensitive environment. It is noted the no drainage system is proposed on the northern side of the development adjacent to the SAC.

Flood Risk – The drainage arrangements associated with pitch construction will interfere with naturally occurring water springs on the site.

Effects of Artificial Light – Light pollution associated with the development may impact of adjoining lands where horses are bred.

Light pollution – Reference is made to a 2006 report titled 'Artificial Light in the Environment' from the Royal Commission on Environmental Protection (UK) stating that 'Habitat degradation and chemical pollution are often cited as causing biodiversity loss, but it is plausible that artificial light could be a contributory factor'.

Reference is made to a UK policy on light pollution

Visual impact of flood lights – No imagery provided by the applicant.

NO<sub>x</sub> and CO<sub>2</sub> emissions - as a result of traffic intensification.

Health – over intensification of traffic will impact on people walking in the area.

Playground – Necessity for an additional playground queried noting the existing playground in Rinville Park.

#### Rinville Park Graveyard

The use of the facility will conflict with the use of the adjoining burial ground during burial times.

#### Planning Process

Planner's report – fails to give due consideration to the observers

Unauthorised development - reference is made to recent planning history on the adjoining site to the north.

Proposed Pavilion – Impact of the pavilion (club house) cannot be assessed. However, the photomontage would suggest a height of 8m and will be a building with significant prominence over the Rinville Park Area and will be contrary to policy LCM 1, objective LCM 1 and LCM 2 of the development plan.

Hurling wall/ terrace area - is a retaining wall for the considerable earthwork spoils from the levelling works on site.

Machinery shed – constitutes an intrusive feature in the landscape and is contrary to policy LCM 1, objective LCM 1 and LCM 2 of the development plan.

#### Tourism

The development may impinge on the possibility of creating, promoting or attracting tourist associated business opportunities to the area.

#### Request for Oral Hearing

\*Note: It was considered that there is sufficient information on file to allow for a proper and full assessment of the case without recourse to an oral hearing. The appellant was advised accordingly.

2. Pat and Bernie Canning and others, Rinville West, Oranmore, Co. Galway.

The grounds of appeal can be summarised as follows:

#### *Traffic*

- It is set out that the Traffic and Transport Assessment (TTA) carried out during the summer holiday period is unacceptable. The audit makes no reference of distorted source data noting that no figures were offered in relation to the number of cars and coaches likely to use the site. Usage figures are unsupported. Similarly, car parking is well in excess of minimum requirements.
- Query raised regarding access arrangements to the site and the justification to reduce the sightlines and stopping sight distance.

#### *Environment*

- It is set out that it has not been established that the development would not impact adversely on the integrity of the adjacent European Sites and that it is not acceptable to suggest that the preparation of a Construction Management Plan to address mitigation measures. All mitigation should be specified in advance of the development so that the residual impacts can be determined.
- Having regard to the scale of the proposal on a site of 13.75 hectares and with the extent of intervention in terms of landscape, ecology, archaeology in a landscape of high amenity value, it is suggested that the projects warrants an Environmental Impact Assessment.

#### *Archaeology*

- The submission of archaeological assessment and archaeological testing is noted. However, it is set out that the development does not comply with Objectives ARC 1 and ARC 7 of the development plan. It is asserted that the toilet block and a wastewater treatment system within metres of a centrally located ringfort.

#### *Community Gain*

- The community gain for the everyday resident of Oranmore and rural Rinville is questioned in so far as the development is a private development on behalf of the GAA and the pitches are not open to the

public. There is only mention of extended path, a playground and provision of a toilet block.

#### *Visual Impact*

- The site is located in a Class 3 – High Sensitivity area under Section 13.11 of the development plan, which restricts development. Objective LCM 2 seeks to ensure the design and choice of location need to be considered in high landscape sensitivity areas.

#### *Impact on Residential Dwellings*

- It is set out that this is a significant development with a club membership in excess of 1000. The number of playing pitches and parking spaces points to an intensive enterprise that would attract county and regional level events. The local road network is not capable of absorbing the proposed use at peak times and will impact on locals travelling to and from their homes.
- The introduction of floodlighting is a rare and significant intervention in any rural area. Such intense illumination will be visible and detract from the character of the area. There is no evidence presented of the impact of this lighting to the receiving environment in terms of the human population and to the many species identified in the nearby conservation areas.
- It is set out that no details have been submitted in relation to the warmup area to the northeast of four dwellings which front the site on the Maree Road in terms of level of activity and accessibility.

#### *Sustainability*

- The site is a car dependent facility almost 3km from the nearest urban centre. Traffic congestion will emit toxins into the atmosphere and degrade air quality, in addition to the mass use of concrete. The public lighting will be an unwelcome intervention on the landscape and likely to have severe impact on the Natura network of habitats.

#### *Conclusion*

- The proposal was put forward without any meaningful community consultations

- It is also noted that the use of the facility will conflict with the use of the adjoining burial ground during burial times.

3. Michael Fleming, Rinville West, Oranmore, Co. Galway.

The grounds of appeal can be summarised as follows:

- It is set out that the appellant shares and boundary fence and right-of-way with the developemt. The appellant asserts that legal protection is required in this regard.
- The development is not an extension of the existing facilities, it is a major new developemt.
- The Green Buffer Zone and warm up area is actually designated as a Pitch.
- The looped walk will be privately owned and may never from part of the public amenity walk.
- The treatment plant is located in an area prone to flooding.
- The playground and “hidden” pitch will cause noise pollution.
- The lane is used by large farm machinery and the location of the playground is unsafe.
- The development will cause traffic problems. The area has no footpath. No public lighting, no public transport and no hard shoulder. This may impact on emergency response times.
- There is no lighting plan and there appears to be 21 not 12 floodlights.
- It is set out that the volume of artificial fertilizer and chemicals needed to maintain the pitches poses a pollution risk.

## 7.2. Applicant Response

- It is set out that the local community has been actively seeking a suitable site for the development for 12years. The club has 71 teams availing of 3 dispersed local pitches in the Oranmore – Maree Area, which they are renting. The developemt is not a regional facility but a permanent home for the Oranmore Maree GAA Club.

- It is set out that the development will form a natural extension to the existing sporting recreational facilities at this location.
- The development will provide a suitable facility for the amalgamation of 3 clubs, namely, Oranmore-Maree GAA Club, Naoimh Mhuire Ladies Football Club and Oranmore-Maree Camogie Club.
- In relation to Road Safety Audit all issues were addressed as part of the further information reply and the unsolicited additional information submitted on 5<sup>th</sup> July.
- It is set out the Traffic and Transport Assessment allows for significant spare capacity to provide for a slight variation in traffic forecasts that may occur. It is noted that the Roads section expressed no issues with the findings of the TTA or the capacity of the existing road network to cater for the development.
- Car parking provision is in line with development plan standards. However, if the Board considers the provision excessive, the applicant will reduce car parking by 20 spaces, should the Board be minded to grant planning permission.
- Regarding the impact on Birds, wintering Bird Surveys have been addressed in the NIS submitted. The NIS concluded that the impact on relevant bird species would be “negligible”.
- Access proposals were amended during the course of the application in response to the requirements of the Councils Road Section.
- Owing to the traffic counts and the low levels of anticipated traffic, a stacking lane was not warranted.
- It is set out that at pre-planning the Council agreed that speed surveys would inform the junction design and visibility splay requirements.
- It is set out that the Maree Road L-8104 already accommodates club generated traffic movements from the existing GAA facilities in Maree.
- The X-Distance of 2.4m accords with all relevant NRA/TII guidelines.
- The amended NIS has regard to Construction Management proposals.



- The development has been designed to ensure that no adverse impacts will arise from surface water on site, details of surface water drainage and management proposals have been addressed including works to protect that Tureen Stream during construction. Surface water is controlled by the provisions of condition no. 6 and no. 14.
- In relation to flooding, it is set out that there is no evidence of naturally occurring water springs on site.
- The development does not fall into any category requiring EIAR.
- It is set out that a Bat Survey formed part of the Ecological Impact Assessment.
- The subject site has one Recorded Monument only and the proposal provided for an appropriate buffer zone. Archaeological and geophysical investigation were carried out in site and considered satisfactory.
- The nature of the proposed design will not result in an incongruous feature in the landscape in this location. This is examined and demonstrated in the Visual Impact Assessment and Photomontages which accompanied the application. It is set out that the development complies with Section 13.11, objectives CF4 and CF5 of the CDP.
- A Flooding Lighting Impact Assessment accompanied the planning application. The report demonstrated that there are no surrounding properties within the lighting spill of the pitches, including the adjoining farmlands where horses are bred. The third-party reference to UK reports and guidelines on floodlighting are not relevant.
- The Ecological Assessment concluded that the floodlighting will not have a negative impact on birds or bats. It is set out that floodlighting is controlled by condition no. 4.
- With regards the warmup area to the southeast of the site, it is set out that this will be used for occasional use such as infrequent tournament events.
- The site will consist of 70- 80% green playing fields. Additional landscaping will be carried out on site including tree planting which will offset which concerns in relation to CO2 emissions from vehicles.

- The Burial ground at Rinville serves the local community as will the proposed development. The applicant /operator will engage with the Church Authorities to ensure that matches and tournaments do not coincide with Burials.
- It is set out that the development will not impact on existing amenity walks but will rather extend the amenity walk.
- The planning application for the club house pavilion will be determined as part of a separate planning application.
- The hurling wall is built into the embankment and therefore the 300mm perimeter wall is a retaining wall. There is no retaining wall along the full length of the embankment. It is set out that the presence of a hurling wall is an integral part of any GAA club.
- The proposed development will compliment tourism opportunities in the area.
- Relevant letters of consent from landowners accompanied the planning application.
- The error in drawing no. XK76-121 is noted and this area is proposed as “warm up” area. It is set out that the applicant is willing to accept a condition regarding the use of the warm up area.
- It is set out that the proposed playground will be used during the day only and will not generate adverse noise impacts.
- It is set out that there is a continuous uninterrupted footpath along the L-8104 between the site and Oranmore village.
- The preparation of an Emergency Response Plan is not required.
- It is set out that there are 12 no. 21m floodlights proposed only.
- Ant right of way issue is a civil matter and not a planning matter.

### 7.3. Planning Authority Response

None

## 8.0 Assessment

8.1. The following assessment covers the points made in the appeal submissions, and also encapsulates my *de novo* considerations of the application. The main planning issues in the assessment of the proposed development are as follows:

- Principle of Development
- Traffic and Accessibility
- Visual Amenity
- Residential amenity
- Archaeology
- Ecology
- Other Matters
- Appropriate Assessment

### 8.2. Principle of Development

- 8.2.1. The site is located 2.4km southwest of the centre of Oranmore with a footpath link between the site and Oranmore village and the wider Rinville Park area including looped walks and playground. The applicant argues that the development will form a natural extension to the existing sporting recreational facilities at this location, including the marina to the southwest of the peninsula.
- 8.2.2. The development provides for a central facility for the amalgamation of three clubs, namely, Oranmore-Maree GAA Club, Naoimh Mhuire Ladies Football Club and Oranmore-Maree Camogie Club. Geographically, I consider the site to be a central location in terms of the catchment of the club. I do not consider it necessary that such a facility would be located in close proximity to an urban area. A facility of this nature requires a significant amount of land to provide for playing pitches etc. A site in excess of 13 hectares may be difficult to secure in areas closer to urban centres. GAA clubs in general are rural in nature and origin. It would therefore be appropriate in my view to locate such a facility in a rural area provided that that area is centrally located and easily accessible.

### 8.3. Traffic and Accessibility

- 8.3.1. The third-party appellants argue that the local road network is not sufficient to cater for the development. A Traffic and Transport Assessment and Road Safety Audit have been submitted with the application. The club has over 1000 members and the development provides for 248 car parking spaces and 8 coach parking spaces to service the site and the wider Rinville Park area.
- 8.3.2. Access to the site is proposed via a new access junction off the L-81043 Rinville Road, located 70m northwest of the existing L-81043 /L-8104 Maree Road junction. A second vehicular access to serve the proposed machinery shed is proposed onto the L451015 local road, to the north of the site. The L-8104 Maree Road is a strategic route connecting the wider area to Oranmore and onward to Galway City. The road is of an appropriate width and surface condition and capable of accommodating traffic travelling in both directions comfortably. The local road serving the site the L-81043 is also of sufficient width and surface condition to cater for the development. The L-81043 is a minor territory road and will serve the machinery store and some initial construction traffic only. A speed limit of 80kph applies to the road network in the area.
- 8.3.3. The traffic survey count was undertaken in July 2018 and the appellants contend that this is not a true reflection of traffic in area given that the count was taken during the summer holiday period. The Traffic and Transport Assessment sets out that weekday PM peak hour movements will be in the region of 23 movements and weekend afternoon peak hour in the region of 53 movements, in and out of the site. The proposal is for a local community GAA facility only and not a “centre of excellence” for the County and in my view, it is difficult to estimate the levels of traffic to and from the facility. It is noted however that not all pitches will be used at one time. This would suggest that the traffic levels indicated would be a reasonable approximation of traffic volumes. The assessment forecasts that the road network will operate within capacity and that no queuing is forecast as a result of the increased traffic volumes at the junctions.
- 8.3.4. With regard to sightlines, I consider that sightlines at the entrance to the site from the L-81043 are adequate in both directions having regard to the bend in the road and the proximity to the L-81043/L-8104 Maree Road junction which serve to reduce traffic speed.

- 8.3.5. However, sightlines at the junction of the L-81043 /L-8104 Maree Road junction approximately 70 metres to east of the site are slightly more problematic. Sightlines are identified as 60m in both directions at 2.4m back. DM standard 20 of the development plan refers to compliance with the NRA Design Manual for Roads and Bridges (2011) which sets a standard of 160m visibility where the design speed is 80km/ph. The sightlines identified are not consisted with the minimum standards. I do note however that It is generally accepted that a minimum sightline of 90 metres is acceptable on county roads. I note the Roads Section of the local authority raised no objection to the proposed access arrangements to the site or the additional traffic at the junction the L-81043 /L-8104 Maree Road junction in terms of sightline availability. Condition no. 11 of the decision of the planning authority refers to the completion of a Stage 2 Road Safety Audit prior to the commencement of development.
- 8.3.6. The applicant argues that at pre-planning the Council agreed that speed surveys would inform the junction design and visibility splay requirements and the X-Distance of 2.4m accords with all relevant NRA/TII guidelines. The Road Safety Audit submitted with the planning application set out the 85<sup>th</sup> percentile speed survey data provided to accompany the application demonstrated speeds significantly less than the maximum 80km/hr. It is argued the due to the alignment of the road and the traffic speed that a visibility splay and stopping sight distance of 60m is appropriate, however it does acknowledge that the required visibility for the posted speed limit is 160m minimum, with two steps below desirable minimum being 90m.
- 8.3.7. My on-site observations indicated sightlines at the L-81043/L-8104 Maree Road junction looking northwest are severely limited from the near edge of the road and only marginally better to the far edge of the road. Visibility looking northwest was not achievable until I crossed the white stop line. The stop line is located slightly forward of the adjoining masonry wall behind which there is dense vegetation including trees. I also noted that this masonry wall to the northwest is staggered forward of the roadside boundary looking towards the southeast and is set back approx. 1m only from the edge of the carriage way of the L-8104. Therefore, the 2.4m "X" distance set back is not available and the 60m sightlines as identified cannot be achieved looking northwest at this junction. To the southeast there is a significant grass verge and sightlines as identified can be achieved. Further to the above and of significant importance is that the RSA recommends the speed limit in the locality should be

reduced to a maximum of 50 km/hr. The speed limit is currently at 80km/hr and the reduction in the speed limit required to ensure the safety of the junction is matter for the Elected Members of Galway County Council and cannot and be controlled by the imposition of a planning condition.

- 8.3.8. In conclusion therefore, I consider that the road network serving the site is inadequate to cater for the additional traffic generated by the development. The general speed limit applies in this area, and whilst I do not consider the weekly traffic generated hugely significant, the potential for increased traffic movements at the weekend and on match days including bus movements and the associated vehicular turning movements at the junction the L-81043 /L-8104 Maree Road junction at a point where the general speed limit applies and sightlines are restricted would endanger public safety by reason of a traffic hazard. Planning permission should be refused for this reason.

#### **8.4. Visual Amenity**

- 8.4.1. The site is located within a landscape designated as Class 3, highly sensitive, in the development plan, where it is an objective to protect these lands from inappropriate development. Policy LCM1 states that regard must be given to the landscape sensitivity classification of sites in the consideration of any significant development proposals and, where necessary, require a Landscape and Visual Impact Assessment (LVIA) to accompany such proposals. A Visual Impact Assessment and photomontages were submitted with the planning application. The appellants argue that the development will negatively on the visual amenity of the area, and furthermore the impact of the proposed clubhouse pavilion cannot be asset as it does not form part of the current application.
- 8.4.2. The site is undulating in nature and whilst I note there is a significant level of cut and fill proposed across the site, the levels have been appropriately tapered to adjoining land levels outside of the site so as to integrate the modified levels back into the natural landscape. Furthermore, the landscaping plan submitted provides for any tapered banks to be planted with wildflowers, in addition to mature tree planting and native woodland planting to the southeast creating a buffer between the site and the existing houses to the southeast. A 5-metre-high mesh boundary fence is proposed around the

perimeter of the site. The landscaping is intended to enhance the biodiversity of the site. I consider this approach acceptable.

8.4.3. The photomontages submitted with the planning application indicate the perimeter fencing and floodlights and the future clubhouse pavilion will be visible in the middle ground when viewed from the L-81043 (Coast Road) but that this view is significantly reduced when looking northeast from the Renville Park lower car park located opposed the shoreline. I am satisfied that the development as proposed would not represent a serious visual intrusion at this location given the nature of the development and the extensive landscaping proposed. In relation to the future club house pavilion building, I note the image presented is indicative only, however having regard to the sensitive site location that design of any structure going forward shall appropriately integrated into the rural landscape so as not to detract from the visual amenity of the area or reflect a dominant feature in the landscape.

8.4.4. I am satisfied that the proposed development will not be detrimental to the visual amenity, in particular, the scenic coastline of Galway Bay.

## 8.5. Residential Amenity

A number of issues were raised in relation to residential amenity, namely impact of traffic, noise, light pollution and privacy. I propose to deal with each of these issues in turn.

### 8.5.1. Traffic

There is a number of houses located to the immediate east of the site fronting onto the Maree and this road is characterised by a significant pattern of one-off rural dwellings. Traffic will give rise to some noise pollution, I note however that the access and car parking are located off the Coast Road and not the Maree Road and therefore the majority of traffic movements will take away from the dwellings. I would also reiterate that traffic volumes associated with the development according to the applicant will be relatively low amounting to circa 46 car movements midweek and 106 vehicular movements at the weekends.

### 8.5.2. Noise

A noise impact assessment was not carried out as part of the application. I acknowledge that the proposal by its very nature will generate noise and noise might also be an issue during warm up sessions on the warm up area adjacent to the appellants' property and potential shouts from the players and the blowing of referees' whistles may give rise to some nuisance. However, any such noise is only likely to arise when training takes place on pitch no. 5 (all-weather pitch) and the warm up area to the east of the site and therefore will be infrequent. These areas will not be in use all the time as pitches no. 1, 2, 3 and 4 are the larger playing fields and these are further removed from the residences located to the east of the site. Pitches 1-4 will not give rise to any noise level which would significantly impact on the appellant's amenity by virtue of separation distance. The noise levels associated with the warm up area and pitch no. 5 will be on the whole infrequent and not of an intensity which would adversely affect the appellants' amenity to a significant extent.

#### 8.5.3. Light Pollution

A Floodlighting Impact Assessment was carried out for the development. Flood lighting is proposed for pitch no. 2 and pitch no. 3 only. The light spillage layout submitted with the impact assessment indicates that no surrounding property will be impacted by light spillage.

#### 8.5.4. Privacy

I do not consider that the proposed development would significantly impact on the appellants' privacy. The proposed future clubhouse is indicated over 200 metres from the house to the east and the adjacent pitch is 115m. There is a warm up area towards the east of the site the boundary which is approx. 25m from the rear boundary of the dwellings to the east. It is proposed to plant a native woodland buffer along this shared eastern boundary. I consider this an acceptable buffer particularly as the warm up area will be used for short periods of time and will not be in constant use. Furthermore, the nature of the activities to be carried out on adjoining pitches (i.e. fitness training and the playing of matches) will not give rise to any significant adverse impacts in terms of overlooking and therefore impacting on the appellants' privacy.

### 8.6. Archaeology



- 8.6.1. The appellants assert that the development does not comply with Objectives ARC 1 and ARC 7 of the development plan. It is asserted that the toilet block and wastewater treatment system are located within metres of a centrally located ringfort.
- 8.6.2. The site and its surroundings area are of significant heritage value. It is noted that there is one Recorded Monument within in the site GA095-130 Ringfort, in addition to one on the site boundary to the northwest and a number of others outside of the site area.
- 8.6.3. A comprehensive Archaeological Assessment was carried out on site. Furthermore, a geophysical survey was undertaken and based on the findings, a schedule of test excavations were carried out under licence from the Department. During the field survey a small number of archaeological artefacts were uncovered. The reports submitted recommend further geophysical survey in field no. 4 and a programme of pre-development testing is recommended across the entire development site. A buffer of 15m is to be maintained around Recorded Monument GA095-130 Ringfort.
- 8.6.4. In their report dated 8<sup>th</sup> July 2019, I note the Department of Culture, Heritage and Gaeltacht raised no objection to the development subject to the maintaining a 15m buffer between the development and the external perimeter of Recorded Monument GA095-130 Ringfort and further assessment work to be undertaken on site.
- 8.6.5. Subject to compliance with the requirements of the of the Department of Culture, Heritage and Gaeltacht, I am satisfied that the archaeology of the site will be protected.

## 8.7. **Ecology**

- 8.7.1. An Ecological Impact Assessment has been submitted with the application. This has regard to Desk Study and Field Surveys. These include regard to habitats, including water courses, flora and fauna on site. A Habitats Map is included in Fig.7 and Table 1 provides an Ecological Evaluation of Sensitive Receptors. Regard is had to the impact of construction on the Tureen Steam and downstream habitats in the Galway Bay SAC and Inner Galway Bay SPA protected fauna including bats, badger, otter, deer, breeding birds.
- 8.7.2. The report sets out that best practice techniques will be employed during construction to protect the stream to include a temporary perimeter drain to manage construction

run-off. A site-specific construction management plan is included in the Natura Impact Statement submitted with the planning application.

- 8.7.3. A field survey was undertaken on the site. It was noted that site comprises of heavily grazed or mown grassland and the Turreen Stream is located at its closet c. 14m from the site boundary. The survey detected no otter or otter holts or resting places. The assessment states that there are no records of badgers and no badger sets in the study area and no potential for badgers on the project site. A bat survey was undertaken, during the survey two bat species were identified entering the site from Renville Wood; Soprano Pipistrelle and Leisler's Bat. No bats were observed using the area of site adjacent to the Turreen Stream or the scatter trees leading to the northwest toward the March area. It is considered that the development will have minimal impacts on the local bat population, and it is unlikely there will be loss of foraging habitats to bats. A number of breeding bird species were recorded during fieldwork. The inner Galway Bay SPA is located approx. 380m from the northern site boundary and 360m from the southern site boundary. The predicated impact on Wintering or Breeding Birds is explored in more detail in the NIS and will be discussed in more detail in section 8.10 below.
- 8.7.4. Indirect impacts with respect to wastewater are no predicated and there is no predicated impacts on the hydrology of the Turreen stream as a result of surface water or ground water. The report sets out that best practice techniques will be employed during construction to protect the stream to include a temporary bunded settlement ponds in the area of wet grassland at the north western end of pitch no. 4 which will temporarily attenuate and allow settlement of silt laden water during the construction phase.
- 8.7.5. In relation to floodlighting and Bats there is no predicated impacts on bats from flood lighting from the development. It is set out that the issue of flood lighting only comes into play during the summer months when matches are played, as bats hibernate and will not be affected by lighting during the hibernation period November – March.
- 8.7.6. It is concluded in the Report, that given the mitigation proposed for the predicted impacts as described in the documentation submitted that the proposal will not result in adverse impact on the ecology in the local or wider environment

## 8.8. **Flooding**

- 8.8.1. The grounds of appeal argue that the site is prone to flooding. I have consulted the OPW's National Flood Hazard Mapping Website and I note that there is no record of any flooding on the site in question. The applicant also states that there is no evidence of naturally occurring water springs on site. Furthermore, surface water drainage infrastructure is to be incorporated as part of the construction works to be carried out on site. All surface water for the pitches will infiltrate to the underlying ground or be collected by a pitch drainage system. The surface water collected from the pitches will eventually discharge to the Tureen Stream. The development has been designed to ensure that no adverse impacts will arise from surface water on site, details of surface water drainage and management proposals have been addressed including works to protect that Tureen Stream. Similarly, hard surfaces such as car parks and buildings will be collected by a storm drainage network fitted with a petrol interceptor and discharge to the watercourse.
- 8.8.2. Having inspected the site, I consider that the stream channel is of sufficient width and depth to accommodate any surface water being discharged off-site in a controlled manner. In conclusion therefore I consider that the works to be carried out on site should militate against any potential flooding events, should they arise.

## 8.9. Other Matters

### 8.9.1. Right of Way

Mr. Michael Fleming (Appellant) sets out that he shares a boundary fence and right-of-way with the development. In this regard, I note that the planning system is not designed as a mechanism for resolving disputes about title to land or premises or rights over land; these are ultimately matters for resolution in the Courts. In this regard, it should be noted that, as section 34(13) of the Planning Act states, a person is not be entitled solely by reason of a permission to carry out any development. Should planning permission be granted and should the appellants or any other party consider that the planning permission granted by the Board cannot be implemented because of landownership or title issue, then Section 34 (13) of the Planning and Development Act 2000 is relevant.

### 8.9.2. Graveyard

The appellants argue that the development will impact on the Burial ground at Rinville and that the proposed use could conflict with burials. In response the applicant states that the graveyard serves the local community as will the proposed development and that the applicant will engage with the Church Authorities to ensure that matches and tournaments do not coincide with Burials.

#### 8.9.3. Tourism

The appellants assert that the development will have a negative impact on local tourism. In this regard, I do not consider the development will impact on the already established amenity of Rinville Park or the visual amenity of the area. I am satisfied that the development will not impact in any negative way on local tourism.

#### 8.9.4. Environmental Impact Assessment (EIA)

The proposed development does not fall within a class of development set out in Part 1 or Part 2 of Schedule 5 of the Planning and Development Regulations and therefore is not subject to EIA requirements.

#### 8.9.5. Request for Oral Hearing

It was considered that there is sufficient information on file to allow for a proper and full assessment of the case without recourse to an oral hearing. The appellant was advised accordingly.

### 8.10. **Appropriate Assessment**

#### Stage 1 Screening

8.10.1. The proposed development would not be located within an area covered by any European site designations and the works are not relevant to the maintenance of any such sites. The Inner Galway Bay SPA (Site code 004031) is located approx. 380m from the northern site boundary and 360m from the southern site boundary and the Galway Bay Complex SAC (Site code 000268) at its closest point is located to the immediate north of the site.

8.10.2. **Conservation Objectives:** to maintain or restore the favourable conservation condition of the Annex 1 habitat(s) and / or the Annex II species for which the SPA and SAC has been selected

<b>European Site</b>	<b>Site Code</b>	<b>Relevant QI's and CI's</b>	<b>Distance</b>
Galway Bay SAC	000268	<p>Conservation Objectives</p> <p>To maintain the favourable conservation of the priority habitats listed below.</p> <p>Priority habitats include:</p> <p>Mudflats and sandflats not covered by seawater at low tide</p> <p>Coastal lagoons*</p> <p>Large shallow inlets and bays</p> <p>Reefs</p> <p>Perennial vegetation of stony banks and other annuals colonising mud and sand</p> <p>Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>)</p> <p>Otter <i>Lutra lutra</i></p> <p>Harbour seal <i>Phoca vitulina</i></p> <p>Mediterranean salt meadows (<i>Juncetalia maritimi</i>)</p> <p>Turloughs*</p> <p>formations on heaths or calcareous grasslands</p> <p>Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco Brometalia</i>)(*important orchid sites)</p> <p>Calcareous fens with and species of the <i>Caricion davalliana</i>*</p> <p>7230 Alkaline fens</p>	<p>Immediate north of the subject site</p> <p>*It is noted that the Road is the true boundary of the SAC and the field boundary abutting the site is an error. Therefore, there is no overlap between the site and the SAC.</p>

Inner Galway Bay SPA	004031	<p>Conservation Objectives</p> <p>To maintain the favourable conservation of the priority habitats listed below.</p> <p>Priority habitats include:</p> <p>Great Northern Diver (<i>Gavia immer</i>)</p> <p>Cormorant (<i>Phalacrocorax carbo</i>)</p> <p>Grey Heron (<i>Ardea cinerea</i>)</p> <p>Light-bellied Brent Goose (<i>Branta bernicla hrota</i>)</p> <p>Wigeon (<i>Anas penelope</i>)</p> <p>Teal (<i>Anas crecca</i>)</p> <p>Shoveler (<i>Anas clypeata</i>)</p> <p>Red-breasted Merganser (<i>Mergus serrator</i>)</p> <p>Ringed Plover (<i>Charadrius hiaticula</i>)</p> <p>Golden Plover (<i>Pluvialis apricaria</i>)</p> <p>Lapwing (<i>Vanellus vanellus</i>)</p> <p>Dunlin (<i>Calidris alpina</i>)</p> <p>Bar-tailed Godwit (<i>Limosa lapponica</i>)</p> <p>Curlew (<i>Numenius arquata</i>)</p> <p>Redshank (<i>Tringa totanus</i>)</p> <p>Turnstone (<i>Arenaria interpres</i>)</p> <p>Black-headed Gull (<i>Chroicocephalus ridibundus</i>)</p> <p>Common Gull (<i>Larus canus</i>)</p> <p>Sandwich Tern (<i>Sterna sandvicensis</i>)</p> <p>Common Tern (<i>Sterna hirundo</i>)</p> <p>Wetland and Waterbirds</p>	Approx. 380m from the northern site boundary and 360m from the southern site boundary
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8.10.3. Potential indirect effects on the Galway Bay SAC and the Inner Galway Bay SPA relate to:

- Detrimental change to water quality as a result of the proposed development as a result of sediment laden surface water run-off entering the Turreen Stream located on the north western site boundary which would affect the habitats or food sources for which the Galway Bay SAC and the Inner Galway Bay SPA species are designated. In particular, in this case the potential impact on otters. In the absence of mitigation measures, it is not possible to rule out impacts on water quality which could negatively impact on water sensitive qualifying interests of the SAC and the SPA.
- Disturbance from noise and light pollution and habitat disturbance on wintering bird species of the SPA during the construction phase.

8.10.4. On the basis of the information on the file, which I consider adequate in order to issue a screening determination, it is not possible to conclude that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on European Site 000268 and European Site 004031 and , or any other European site, in view of the site's Conservation Objectives. A Stage 2 Appropriate Assessment is therefore, required.

***Appropriate Assessment – Stage 2 NIS***

A Natura Impact Statement was submitted to the Planning Authority.

8.10.5. The Galway Bay Complex is a very large (14,408.98ha) marine dominated site, made up of subsidiary bays, inlets and islands to name a few and the Inner Galway Bay SPA is a very large, marine dominated, site which supports internationally important wintering populations.

***Galway Bay SAC***

The Galway Bay SAC is a site is of great ecological interest as it contains a high number of habitats and species listed on Annexes I and II, including the priority habitats Mudflats and sandflats not covered by seawater at low tide, Coastal lagoons\*, large shallow inlets and bays, otters and harbour seals.

8.10.6. As set out in the NIS there is a small drain located at the north western site boundary which provides a hydrological link to the Galway Bay SAC.

8.10.7. Surface water run-off associated with the construction stage and operational phase could potentially enter the stream and ultimately the SAC. Therefore, in the absence of mitigation measures, there is potential for indirect effects on surface water quality during site preparation and earthworks. The NIS noted that the potential impact on the Turreen Stream and downstream habitats will be avoided by the inclusion of silt trapping and the proposal to construct a temporary bunded settlement ponds in the area of wet grassland at the north western end of pitch no. 4 which will temporarily attenuate and allow settlement of silt laden water during the construction phase. The development has been designed to be drained by a series of filter drains comprising washed pea gravel which will lead to two settlement ponds. The ponds will be separated from the adjacent Turreen Stream by a temporary earth bank and will be interconnected by a weir dam overflow system to aid settlement before discharge to the Turreen Stream. Once the project is complete the settlement ponds will be deactivated and the in-situ collector drains will serve to attenuate and filter surface water leaving the site.

#### 8.10.8. Potential Effects

##### ***Water Quality***

Potential impacts include contaminants entering the waters of Galway Bay impacting on the water quality and qualifying interest species arising from surface water run-off, or impacts from foul water effluent storage, collection and disposal.

The NIS recommended sediment control mitigation measures to protect the environment from pollutants. These include the use of silt fences, attenuation ponds, settlement tanks and soakaway areas to ensure all run off water is treated prior to discharge. I note also that no issue was raised regarding the discharge of effluent on site and a site-specific site characterisation assessment was carried out on site. Adherence to best practices methodologies during the construction phase would control the release of sediments to surface water and prevent surface and ground water pollution as a result of accidental spillages or leaks.

##### ***Otter***

A deterioration of water quality and consequent reduction of fish stock and prey on which the otter depends, could present a threat to the population.



The full implementation of mitigation measures and adherence to best practice will ensure that downstream water quality is protected and commuting routes along watercourses will not be affected. Therefore, no adverse effects on this Qualifying Interest species are anticipated.

### ***Seal***

A deterioration of water quality and consequent reduction of fish stock and prey on which the seal depends, could present a threat to the population.

The full implementation of mitigation measures and adherence to best practice will ensure that downstream water quality is protected and commuting routes along watercourses will not be affected. Therefore, no adverse effects on this Qualifying Interest species are anticipated.

### ***Conclusion***

Having regard to the nature and scale of the proposed development, notwithstanding the presence of an aquatic connection to a European site via the nearby Turreen Stream, and to the nature of the qualifying interests and the conservation objections, it is my opinion that the proposed development, subject the full implementation of the mitigation measures and compliance with best practice methodologies during the construction phase, would not have the potential to affect the SAC or its conservation objectives.

It can be reasonably concluded on the basis of best scientific knowledge therefore that the proposed development will not adversely affect the integrity of the Galway Bay SAC.

### ***Inner Galway Bay SPA***

The SPA supports an excellent diversity of wintering wetland birds, with divers, grebes, cormorants, dabbling duck, sea duck and waders all well represented. There are internationally important wintering populations and nationally important wintering populations. The site provides both feeding and roost sites for most of the species.

The development site is located approx. 360m at its closest point from the SPA.

The sites is covered by GA1 grassland, mostly well-cropped ryegrass-dominated pasture which is potentially available to feeding waterbirds. The proposed development will remain for the most part grass, whose classification will change from GA1 to GA2, whose species composition will likely remain the same. It is noted that huge areas of intertidal habitat within the SPA are available to all wintering waterbird species. It is considered that there is ample overspill foraging for all relevant SCI species populations in the area. Therefore, no significant negative impact on local populations of Inner Galway Bay SPA SCI species is expected, the impacts are likely to be imperceptible.

There is no predicated construction disturbance impacts on the 14 inner Galway Bay SPA SCI species as a result the 360m buffer between the site and the SPA.

When any pitch is in use it is expected that any birds which are present will fly away. Furthermore, the floodlighting impact assessment indicated that there will be no light spillage on the SPA as a result of the development.

**Conclusion:** It can be reasonably concluded on the basis of best scientific knowledge that the proposed development will not adversely affect the integrity of the Inner Galway Bay SPA

**In-combination effects:**

There is are no recent significant planning decisions or plans or projects identified in the immediate vicinity of the site.

Having regard to the nature and scale of the proposed development it is considered that it does not have the potential for in-combination effects, after mitigation measures are applied, to undermine the integrity of either European site.

**Appropriate Assessment conclusion:**

I consider it reasonable to conclude on the basis of the information on file, which I consider adequate in order to carry out a Stage 2 Appropriate Assessment, that the proposed development, individually or in combination with other plans or projects would not adversely affect the integrity of the European European Site 000268 and European Site 004031 any other European site, in view of the site's Conservation Objectives

## 9.0 Recommendation

- 9.1. I recommend that permission be refused for the reasons stated in the attached schedule

## 10.0 Reasons and Considerations

The road network accessing the site is insufficient to cater from the proposed development. 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 the junction of the L-81043 /L-8104 Maree Road at a point where the general speed limit applies and where sightlines are restricted in both directions, would endanger public safety by reason of traffic hazard and would lead to conflict between road users, that is, vehicular traffic, pedestrians and cyclists. The proposed development would therefore be and be contrary to the proper planning and sustainable development of the area.

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Irené McCormack  
Planning Inspector

10<sup>th</sup> November 2019