



An
Bord
Pleanála

Inspector's Report

ABP-313834-22

Development	Retention of the demolition of a derelict building and permission for the construction of a dwelling and all associated site works
Location	Lissycasey, Ennis, Co Clare
Planning Authority	Clare County Council
Planning Authority Reg. Ref.	211249
Applicant(s)	Deirdre & Declan Donnelly
Type of Application	Permission
Planning Authority Decision	Grant Permission
Type of Appeal	Third Party
Appellant(s)	Transport Infrastructure Ireland
Date of Site Inspection	26 th January 2023
Inspector	Liam Bowe

1.0 Site Location and Description

- 1.1. The appeal site is located in a rural area of south County Clare, approximately 50m to the west of the 60kph zone for the village of Lissycasey and 14km to the south-west of Ennis. The site is accessed directly from the N68 national road which connects Kilrush and Ennis. The Owenslieve River flows in a southerly direction approximately 60m to the west of the appeal site. There are houses immediately to the east, west and opposite (south) of the appeal site and there are a significant number of one-off houses along this national road.
- 1.2. The appeal site is stated as 0.312 ha. and occupies an area of road frontage which extends to approximately 40m. The appeal site rises slightly from the public road to the north. There is a 1.2m high block wall along the roadside boundary with a grass verge, public footpath and lighting; the eastern and northern site boundaries are established hedgerows and the western site boundary is open. There is an access lane to the fields to the north that runs along the western site boundary. There is a utility pole at the south-western corner / boundary of the appeal site. The site is grassland and it appeared to be in agricultural use on the day of my site inspection.

2.0 Proposed Development

- 2.1. The proposed development comprises the construction of a house, domestic garage, installation of a domestic wastewater treatment system (DWWTS), connection to the group water scheme and associated site development works at Lissycasey, Ennis, County Clare.
- 2.2. The proposed dwelling is part dormer / part single-storey in design with a ridge height of 7.3m, with render finish, some stone cladding, and blue / black slates. The proposed house and domestic garage will have areas of 252.57m² and 32.56m², respectively. The existing eastern and northern site boundaries are to be retained and the existing block wall on the southern / roadside site boundary is also to be retained.

3.0 Planning Authority Decision

3.1 Request for Further Information

- 3.1.1. Prior to notification of decision, the Planning Authority issued a further information request on 25th January 2022 requiring more details about the First Party's landholding and farming activity, sightlines, and disposal of wastewater. The First Party submitted a response to the Planning Authority on 14th February 2022 with details to address each of the issues.

3.2 Request for Clarification of Further Information

- 3.2.1. Prior to notification of decision, the Planning Authority issued a clarification of further information request on 16th February 2022 requiring more details about the First Party's home address and sightlines. The First Parties submitted a response to the Planning Authority on 14th April and 17th May 2022 with details to address each of the issues.

3.3 Decision

- 3.3.1. By order dated 24th May 2022 Clare County Council issued a Notification of Decision to Grant Permission for the proposed development, subject to 10 no. conditions. Of note are the following conditions:

Condition No.2: Requirement for a 7 year occupancy agreement.

Condition No.4: Requiring retention of roadside boundary except for modifications to entrance per details submitted to the Planning Authority on 17th May 2022.

3.4 Planning Authority Reports

3.4.1 Planning Reports

The initial report of the Planning Officer outlines the relevant planning policy under the Clare County Development Plan 2017-2023, details contained in the reports of the internal and external consultees and raises concerns about compliance with rural housing policy, access onto a national road, sightlines and the disposal of

wastewater. Further information was recommended requiring details and revised proposals on these issues for consideration.

A second report, subsequent to the submission of a response to the further information, recommends that clarification of the further information was required regarding more details on the Frist Party's rural housing need and sightlines.

Appropriate Assessment was carried out and concluded that there was no likely potential for significant effects to any Natura 2000 site.

A third report, subsequent to the submission of a response to the clarification of further information, recommends that permission be granted consistent with the notification of decision which issued.

3.4.2. **Other Technical Reports**

Area Engineer: No observation to make.

Road Design Engineer: The initial report dated 14th December 2021 highlighted Council policy in relation to development on national roads and outlined concerns about the availability of the required sightlines. Further information was requested.

The second report dated 24th May 2022 outlined concerns about the availability of the required sightlines and reiterated Council policy in relation to development on national roads.

Environment Section: The initial report dated 14th January 2022 sought required separation distances between the proposed house and polishing filter.

A second report dated 29th April 2022 confirmed no objection, and recommended conditions.

3.5. **Prescribed Bodies**

TII: Advised that the proposal would create an adverse impact on the national road and would be at variance with the Spatial Planning and National Roads Guidelines for Planning Authorities (January 2012) in relation to the control of frontage development on national roads.

Irish Water: No objection. Conditions recommended.

3.6. **Third Party Observations**

None.

4.0 **Planning History**

4.1. **Appeal site:**

There is no planning history referenced in the report of the Planning Officer.

4.2. **Adjacent site to the west:**

P.A. Ref. No. 16/445: Permission granted for the construction of a slatted agricultural unit.

5.0 **Policy Context**

5.1. **National Planning Framework**

5.1.1. The NPF in relation to rural housing includes objective 19 which states –

Ensure, in providing for the development of rural housing, that a distinction is made between areas under urban influence i.e., within the commuter catchment of cities and large towns and centres of employment, and elsewhere:

- In rural areas under urban influence, facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic or social need to live in a rural area and siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements; and
- In rural areas elsewhere, facilitate the provision of single housing in the countryside based on siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements.

5.2. **Sustainable Rural Housing Guidelines for Planning Authorities (2005)**

5.2.1. The Sustainable Rural Housing Guidelines require planning authorities to differentiate between rural housing demand arising from rural housing need and

housing demand arising from proximity to cities and towns. Additionally, development plans should distinguish rural areas under strong urban influence, stronger rural areas, structurally weak rural areas and areas with clustered settlement patterns. The guidelines state that development management policy should be tailored to manage housing demand appropriately within these areas.

5.3. **Spatial Planning and National Roads Guidelines for Planning Authorities (January 2012)**

5.3.1. Lands adjoining National Roads to which speed limits greater than 60 kmh apply:

The policy of the planning authority will be to avoid the creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60 kmh apply. This provision applies to all categories of development, including individual houses in rural areas, regardless of the housing circumstances of the applicant.

5.4. **Clare County Development Plan 2017-2023**

5.4.1. The site is located in the open countryside, in a rural area where there is no specific zoning afforded to the site. The site is located within an area identified as being under Strong Urban Pressure, referred to as an Area of Special Control in the Plan.

5.4.2. Section 3.2.5 of the Plan deals with Single Housing in the Countryside, and within Areas of Special Control. As such, **Objective CDP3.11 – New Single Houses in the Countryside within the ‘Areas of Special Control’** is relevant and states as follows:

It is an objective of the Development Plan:

- a) In the parts of the countryside within the ‘Areas of Special Control’ i.e.:
- Areas under Strong Urban Pressure (See chapter 17);
 - Heritage Landscapes (See Chapter 13);
 - Sites accessed from Scenic Routes (See Chapter 13 and Appendix 5).

To permit a new single house for the permanent occupation of an applicant who falls within one of the Categories A or B or C below and meets the necessary criteria.

- b) To ensure compliance with all relevant legislation as outlined in Objective CDP2.1 and have regard to the County Clare House Design Guide, in particular with respect to siting and boundary treatment.

Category A – Local Rural Person (which includes 3 criteria)

Category B – Persons working full time or part-time in rural areas.

Category C – Exceptional Health and / or family circumstances.

5.4.3. **Objective CDP13.2: Settled Landscapes**

It is an objective of the Development Plan:

To permit development in areas designated as ‘settled landscapes’ that sustain and enhance quality of life and residential amenity and promote economic activity subject to:

- Conformity with all other relevant provisions of the Plan and the availability and protection of resources,
- Selection of appropriate sites in the first instance within this landscape, together with consideration of the details of siting and design which are directed towards minimising visual impacts, and
- Regard being given to avoiding intrusions on scenic routes and on ridges or shorelines.

Developments in these areas will be required to demonstrate that:

- The site has been selected to avoid visually prominent locations,
- The site layouts avail of existing topography and vegetation to reduce visibility from scenic routes, walking trails, water bodies, public amenities and roads and
- The design for buildings and structures reduce visual impact through careful choice of forms, finishes and colours, and that any site works seek to reduce visual impact.

5.4.4. Other relevant objectives and sections of the plan include:

Objective CDP8.2: Motorways and National Roads

It is an objective of Clare County Council:

- a) To safeguard the motorway and national roads, and associated motorway and national road junctions, in line with national policy;
- b) To support the upgrade and improvement of motorways, national roads and their associated junctions, subject to compliance with requirements of the Habitats Directive;
- c) To advocate for the upgrade of National Secondary Routes in the County in order to improve connectivity between the North and West Clare areas, the Hub town of Ennis and the wider Mid-West Region;
- d) To advocate for the expeditious completion of the M18 motorway from Gort to Tuam.

Objective CDP8.4: Direct Access onto National Roads

It is an objective of Clare County Council:

- a) To safeguard the safety, efficiency and carrying capacity of national primary and secondary roads within the County in line with national policy;
- b) To assess development proposals requiring direct access onto the national road network having regard to the criteria set out in Section 8.2.3.3 of the Plan.

Appendix 1 – Development Management Guidelines where the following is relevant:

A1.3.1 – Rural Residential

- Development which deals with matters relating to siting and design, road frontage, plot size and wastewater treatment systems.

5.5. Natural Heritage Designations

The site is not located within any European site. The closest Natura 2000 sites are the Lower River Shannon SAC (Site code: 002165) and the River Shannon and River Fergus Estuaries SPA (Site code: 004077) both located approximately 6.4km to the east.

5.6. EIA Screening

Having regard to the nature and scale of the proposed development and separation from sensitive environmental receptors, I am satisfied that no likely significant impacts on the environment arise from the proposed development and that the carrying out of an EIA is not required in this case.

6.0 The Appeal

6.1. Grounds of Appeal

6.1.1. The grounds of appeal are submitted by Transport Infrastructure Ireland and the main points made can be summarised as follows:

- Contends that the provision of a new additional house with direct access to the N68 will inevitably bring about additional vehicular turning movements resulting in intensification of access onto and off the N68, national secondary road, contrary to the provisions of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).
- States that the proposed development will give rise to a traffic safety concern where required sightlines have not been demonstrated at the access onto and off the N68 at a highly trafficked and high-speed section of the national road.
- Contends that the proposed development is contrary to the provisions of the Clare County Development Plan 2017-2023 (Objectives CDP 8.2(a) and CDP 8.4(a)) and that no exceptional reason has been put forward to justify a departure from standard policy and road safety considerations.
- Contends that the development as permitted by the Planning authority would set an undesirable precedent for other similar development.
- Requests that investment in the national road network is protected and that National Strategic Outcome 2 of the NPF is observed in 'maintaining the strategic capacity and safety of the national roads network including planning for future capacity enhancements.'

6.2. Applicant Response

6.2.1. The First Parties have submitted a response to the grounds of appeal and the main points made can be summarised as follows:

- Contend that the addition of a house at this location, adjacent to Declan's parents' house and adjacent to his farm buildings will lead to less vehicular turning movements on the N68.
- Contend that 138m sightline is satisfactory towards the east as the proposed entrance would be located just off the 60kph zone and that this is an exceptional reason to grant planning permission.
- Contend that Declan's farming circumstances require him to live close to the agricultural sheds from October to April.
- Contend that a modest house will not have any additional negative impact on the State's investment in the national road network.

6.3. Planning Authority Response

The Planning Authority has noted the appellant's grounds for appeal and requests the Board to uphold the Council's decision.

7.0 Assessment

I consider that the main issues in the assessment of this appeal are as follows:

- Rural Housing Policy on National Roads
- Traffic Safety
- Other Issues
- Appropriate Assessment

7.1. Rural Housing Policy on National Roads

7.1.1. The key issue to be addressed within this appeal relates to the question of whether the applicants have an economic or social need to live in this rural area that meets the requirements of the rural housing policy on a national road as set out in the

development plan. The First Party sets out the justification for providing a house at this location on the basis of a social and economic need to locate on family lands close to where Declan Donnelly was born and reared and is now farming the family lands. TII seek the proposed development to be refused on the basis that the development would not comply with national and local policies relating to accesses off National Roads. The First Parties are of the view that their personal circumstances present exceptional circumstances requiring a domestic entrance at this location as the landholding has no alternative road frontage. As a part-time farmer, Declan Donnelly needs access to the farm during calving season and winter feeding season (October through to March/April), which he currently does not have as he states that he has resided in Kilkee since 2020, c.38km from the appeal site.

- 7.1.2. The site is located in an area identified in the Clare County Development Plan 2017-2023 as an 'Area of Special Control' and an 'Area Under Strong Urban Influence' as identified in the Sustainable Rural Housing Guidelines. In these areas population levels are generally stable within a well-developed town and village structure and in the wider rural areas around them. This stability is supported by a traditionally strong agricultural economic base and the level of individual housing development activity in these areas tends to be relatively low and confined to certain areas.¹
- 7.1.3. The appeal site has direct access from the N68 national secondary road at a point where an 80kph speed limit applies. It is an objective (CDP8.2(a)) of Clare County Council 'to safeguard the motorway and national roads, and associated motorway and national road junctions, in line with national policy' and a further objective (CDP8.4(a)) 'to safeguard the safety, efficiency and carrying capacity of national primary and secondary roads within the County in line with national policy.'
- 7.1.4. The relevant national policy in relation to new or the intensification of existing access points onto and off national roads is contained in the Section 28 Ministerial guidance issued under the Spatial Planning and National Roads – Guidelines for Planning Authorities, published by the Department of Environment, Community and Local Government in January 2012. It is stated in these Guidelines that where lands adjoining National Roads to which Speed Limits of Greater than 60km/h apply:

¹ P.16, Sustainable Rural Housing – Guidelines for Planning Authorities (DoEHLG 2005)

“The policy of the Planning Authority will be to avoid the creation of any additional access point from new developments or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60km/h apply. This provision applies to all categories of development, including individual houses in rural areas, regardless of the housing circumstances of the applicant.”²

7.1.5. Clare County Council have policy under Objective CDP 8.4(b) of the Development Plan ‘to assess development proposals requiring direct access onto the national road network having regard to the criteria set out in Section 8.2.3.3 of the Plan.’ Under this part of the objective, it is stated that the Council will give consideration to developments utilising existing accesses onto national secondary roads for farmers and their sons and daughters who are actively engaged in farming the land, wishing to build a dwelling house for their own permanent residence on family land. It must be clearly demonstrated that there is a genuine need for the dwelling proposed and that there are no other alternative sites available with access off a regional or local road.

7.1.6. One of the main tenants of the First Parties articulation of compliance with Development Plan policy relies on the use of an existing access. They claim that this is a residential access associated with the house that was previously in this field up to 2018 and the use of this would not result in any intensification of use of the access and consequent impact on carrying capacity or traffic safety on the national road. Having reviewed the information on the file, I am satisfied that the derelict house was removed from the field approximately 4 years ago and the field has been agricultural use since. I, therefore, consider that the principle of residential use in the field has extinguished. For clarity, there is no new access onto the N68 proposed as part of this application however, I consider that the fundamental issue in this case is whether or not the proposed new house would lead to an intensification of use of an existing field access.

7.1.7. In this regard, information on the file indicates that the First Parties work as a machine driver (Declan) with McSweeney Bros in Lissycasey and in financial services (Deirdre) with Northern Trust in Limerick City. It is also stated that Declan farms the land (stated as 22 acres) that the subject site forms part of at Lissycasey.

² P.12, Spatial Planning and National Roads – Guidelines for Planning Authorities (January 2012)

A partial copy of a letter from the Department of Agriculture, Food and the Marine was submitted to the Planning authority on 14th February 2022 in response to the RFI stating Declan's herd number. Landholding maps were also submitted with this outlining the 22 acre holding. I consider that the extent of the landholding or Declan's farming activity are not clearly demonstrated such as to comprise a viable farm holding.

- 7.1.8. In the response to the appeal, it has been argued that as the First Party currently uses an existing entrance off the N68 from the site to access his parent's farmyard and that the current proposal would result in a reduction in traffic movements along this part of the N68. In my opinion, the use of the existing access point, which serves an agricultural field, to one serving a domestic house would result in intensification due to normal daily activities arising from day to day occupation, patterns of activity, services, visitors etc... associated with the proposed development. I consider, on the basis of the facts presented, that there would be a significant intensification of use of the existing entrance should the subject proposal be granted permission which would interfere with the safety and free flow of traffic on the adjoining N68 at a point where a speed limit of 80kph applies.
- 7.1.9. The Board should note that Lissycasey is identified as a Small Village in the Settlement Hierarchy of the County Development Plan. I consider the nature of the settlement unusual insofar as it is a linear settlement that stretches along the road for a considerable distance with two service centres, one at each end. The appeal site is located between these two service centres but just outside of the designated settlement boundary for Lissycasey.
- 7.1.10. The Board should also note that under the Draft Clare County Development Plan 2023-2029, the appeal site is located within the settlement boundary for Lissycasey and, among other parcels of land within the designated settlement, has a land use zoning of 'Agriculture'.³ The Draft Plan stipulates that the Agriculture zoning "is for the use of land for agricultural purposes and farming-related activities and to preserve the amenity of the town or village setting. Individual dwellings for permanent occupancy of established landowners (i.e., within family ownership for the preceding 10 years) and their immediate family members will be open for

³ P.228, Volume 3d, Draft Clare County Development Plan 2023-2029

consideration subject to normal site suitability considerations.” It states that immediate family members would include parents, children and siblings.

- 7.1.11. However, the present policy of the Planning Authority is clear, and the objectives aim to avoid the creation of any additional access points from new developments or the generation of increased traffic from existing accesses to national roads to which speed limits of greater than 60km/h apply in accordance with ‘Spatial Planning and National Roads – Guidelines for Planning Authorities (2012)’, subject to the exceptional circumstances. This provision applies to all categories of development, including individual houses in rural areas, regardless of the housing circumstances of the applicant.
- 7.1.12. Notwithstanding the applicant’s personal circumstances, the proposal to use an existing agricultural gate to access a house directly off a national road would result in an intensification of traffic movements at the existing entrance. I note that the TII recommended refusal on the grounds of intensification of an existing entrance to a national road which would be contrary to official policy.
- 7.1.13. While I acknowledge the applicant’s submission in relation to the non-availability of alternative access off a minor road, to permit such an access under the circumstances presented in this application would set an undesirable precedent. Such an approach would lead to a proliferation of entrances onto national roads in direct contravention of the overall objective of the Plan which is to strictly control such development and protect the free flow of traffic and the efficiency and operational capacity of the national road.
- 7.1.14. In conclusion, I agree with the appellants that the proposal would create an adverse impact on the national road and would be at variance with the Spatial Planning and National Roads Guidelines for Planning Authorities (January 2012) in relation to the control of frontage development on national roads. I consider, therefore, that the permission should be refused on this basis.

7.2. **Traffic Safety**

- 7.2.1. As stated previously, the appeal site has an existing agricultural access from and onto the N68 national road. The First Parties propose to upgrade and utilise this access for residential purposes. Sightline and setback requirements for such access

points onto national roads are outlined in the TII document: Geometric Design of Junctions ((priority junctions, direct accesses, roundabouts, grade separated, and compact grade separated junctions) (June 2017). Table 5.4 and 5.5 of this document specify these sightline and setback requirements, which are 160m sightlines in both directions from a 2.4m setback.

- 7.2.2. The First Party has demonstrated sightlines and setback on Drawing no.'s PL/21/79/SL/01, PL/21/79/SL/02 and PL/21/79/SLD submitted to the Planning Authority on 17th May 2022. These demonstrate a 160m sightline to the southwest and a 138m sightline to the northeast of the proposed access, both from a 2.4m setback.
- 7.2.3. TII are categorical in stating that the proposed development will give rise to a traffic safety concern where required sightlines have not been demonstrated at the access onto and off the N68 at a highly trafficked and high-speed section of the national road. In response to this, the First Party contends that a 138m sightline is satisfactory towards the northeast as the proposed entrance would be located just off the 60kph zone and traffic travelling from the northeast would be moving slower exiting the 60kph zone for Lissycasey.
- 7.2.4. The Planning Authority's Roads Engineer raised concerns on this issue in both his original report and second report following the submission of further information. These concerns were not noted in the original Planner's Report and manifested in part of the RFI (item 1 (iv) on Order 79114 dated 25th January 2022 refers). However, the concerns raised in the second Roads Engineer were not referenced in the second Planner's report and a recommendation, and decision, to grant permission followed the response to the RFI.
- 7.2.5. On the day of my site inspection, I observed the nature of this highly trafficked and high-speed section of the national road. I also noted the precise location of the 60kph speed zone to the northeast of the proposed access to the appeal site i.e., approximately 70m, which is annotated on Drawing No. PL/21/79/SL/01. However, the TII document for Geometric Design of Junctions is clear that the required sightline 'shall always be provided'. At present, the First Parties have not demonstrated the required sightline of 160m and due to the highly trafficked and high-speed section of this part of the national road network, I agree with the

concerns of TII and consider that the proposed development would give rise to a traffic hazard.

- 7.2.6. In conclusion, I consider that the proposed development would give rise to a traffic hazard due to inadequate sightlines at point on the national road network where a speed limit of 80kph applies and I, therefore, recommend that the proposed development be refused for this reason.

7.3. Other Issues

Design & Layout

- 7.3.1. As stated earlier in this report, the proposed development comprises the construction of a house that is part dormer / part single-storey in design with a ridge height of 7.3m, with render finish, some stone cladding, and blue / black slates. The proposed house and domestic garage will have areas of 252.57m² and 32.56m², respectively. The existing southern, eastern and northern site boundaries are to be retained. The existing block wall on the southern / roadside site boundary is to be retained.
- 7.3.2. On the day of my site inspection, I observed a mix of house types and designs in the wider rural area around the appeal site. I consider that the proposed house design, which is traditional in form and design, would not form an incongruous feature on this rural landscape. I, therefore, am satisfied that the proposed house would not have any significant adverse visual impact on this rural landscape and would be in accordance with Objective CDP13.2 of the current Development Plan.

Disposal of Wastewater

- 7.3.3. The First Party proposes to treat the wastewater by means of a secondary treatment system and discharge to a polishing filter. I note that the concerns of Environmental Section of Clare County Council regarding separation distances were addressed by the First Parties in their response to the RFI. On the day of my site inspection, I also noted that the ground conditions were good and, in my opinion, consistent with those described within the Site Characterisation Form which indicated a groundwater protection response of R2¹ and the water table to be at a depth of 1.9m. I conclude, based on the material submitted with the application, that the appeal site is suitable for the safe disposal of domestic effluent and with the installation of a proprietary

wastewater treatment system, that the proposed development would not create a serious risk of ground water pollution.

7.4. Appropriate Assessment

Having regard to the nature and scale of the development proposed and the absence of any direct or indirect pathway between the appeal site and any European site and the separation distances to the nearest European site (the Lower River Shannon SAC (Site code: 002165) and the River Shannon and River Fergus Estuaries SPA (Site code: 004077) both located approximately 6.4km to the east), no Appropriate Assessment issues arise, and it is not considered that the proposed development would be likely to have a significant effect individually or in combination with other plans or projects on a European site.

8.0 Recommendation

I recommend that permission be refused for the reasons stated below.

9.0 Reasons and Considerations

1. Having regard to the Spatial Planning and National Roads – Guidelines for Planning Authorities, published by the Department of Environment, community and Local Government in January 2012, to the provisions of the Clare county Development Plan 2017-2023, and to the location of the proposed access onto a national road where a speed limit of 80 kilometres per hour applies, it is considered that the proposed development would be contrary to the guidelines which seeks to preserve the level of service and carrying capacity of national roads and to protect the public investment in the road and would also be contrary to Objective 8.2(a) and Objective 8.4(a) of the development plan, which seeks to prevent new, or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60km/h apply. The Board could not be satisfied on the basis of the information on the file that the applicants come within the scope of exceptional circumstances as set out in the criteria

under Section 8.2.3.3 of the Development Plan. The proposed development would, therefore, be contrary to national and local policy and to the proper planning and sustainable development of the area.

2. It is considered that the proposed development would endanger public safety by reason of a traffic hazard because of the additional traffic turning movements the development would generate on this highly trafficked and high-speed section of national road at a point where sightlines are restricted in a north-easterly direction.

Liam Bowe
Planning Inspector

28th February 2023