



An
Bord
Pleanála

Inspector's Report

ABP-320248-24

Development

Retention permission for extension to existing tooling premises and existing component storage area and planning permission for upgraded surface water drainage system, relocation of traffic barrier, new vehicular staff entrance and alterations to the existing staff & visitor car parks, together with all associated site development works.

Location

Cashla, Athenry, Co. Galway

Planning Authority

Galway County Council

Planning Authority Reg. Ref.

2360948

Applicant(s)

C & F Tooling Ltd

Type of Application

Retention & Permission

Planning Authority Decision

Grant Permission

Type of Appeal

Third Party

Appellant(s)

Brendan Dowling.

Observer(s)

None.

Date of Site Inspection

31st of January 2025.

Inspector

Darragh Ryan

1.0 Site Location and Description

- 1.1. The subject site is located at C & F Tooling precision engineering & manufacturing facility. The site is located to the west of Athenry and to the North of the M6. The site is located along the eastern edge of L-7109 country road, which joins with junction R339 Regional Road 1.1km to the north -west of the site.
- 1.2. The lands at this location are low-lying. There are number of one-off dwellings to the north of the site. Cashla sub-station is located across the road from the site and Cashla Quarry is located to the south west.
- 1.3. The existing site has an existing manufacturing facility with a Gross floor area of 22,940sqm. The Gross floor space to be retained is 6,152.60sqm. Site area is stated at 8.37HA.

2.0 Proposed Development

- 2.1. Retention planning permission is sought for the following extensions to the existing C&F Tooling premises:

- Machine Shop and Canteen (gross floor area - 792m²)
- Switch Room and Compressor room (gross floor area - 96 m²)
- Maintenance Garage and Stores gross floor area - 673 m²)
- Monitoring Office Building (gross floor area - 444 m²)
- Steel Cleaning Shop (gross floor area - 62.3 m²)
- Store (gross floor area - 20.3 m²)
- Machine Shop (gross floor area - 4,065 m²)

In addition to the above, retention permission is sought for the existing Component Storage Area (external) (approx. 1.54 Ha in area).

- 2.2. Planning permission is sought for:

- Upgraded surface water drainage system and associated works.

- Relocation of existing traffic barrier at the existing vehicular entrance to the premises.
- New vehicular staff entrance on the western boundary of the site.
- Alterations to the existing staff car park to provide 357 no. car parking spaces to include the provision of EV charging and accessible car parking bays, and
- Provision of a visitor car park to provide 31 no. car parking spaces (including EV charging and accessible car parking bays).

3.0 Planning Authority Decision

3.1. The planning authority recommended a Decision to grant permission subject to 12 conditions.

- C6 - (i) All surface water generated by this development shall be disposed of within the site and shall not be discharged onto the public road or the adjoining property.

(ii) Proposed development vehicular entrance and associated local widening onto the public road and any Tie in to the existing road margin shall be cleared, graded, levelled and surfaced to a standard suitable for use to the satisfaction of the Area Engineer to prevent unbound material (loose stone) entering onto the public road. Proposed Road make up and tie in to include suitable drainage infrastructure to collect and dispose of surface water runoff from the existing public road. The provisions shall not increase the likelihood of flooding to the development property, the road or adjoining properties
- C8 - Prior to commencement of development, the developer/applicants shall lodge a bond with the planning authority of a cash deposit amount to the sum of €19,250 with the Planning authority, or other cash amount or form of security, as may be acceptable to the relevant planning authority, to secure the reinstatement of the public road L-7109 and road markings which may be damaged by the transport of materials to the site, arising to the additional vehicular loadings being applied to the carriageway, to secure the provision of upgrading a section of wearing course in connection with the development coupled with an agreement empowering the relevant planning authority to

apply such security or part thereof to the satisfactory reinstatement of the public road in the direct vicinity of the development vehicular entrance.

- C9. - On completion of the development, a stage 3 road safety audit shall be completed by an independent road safety auditor, at the developer's expense, and submitted for the written approval of the planning authority. Any safety issues highlighted in the audit shall be reviewed and addressed by the developer at their expense
- C12 - Prior to the commencement of development, the applicant/developer shall pay €132,268.00 to the Planning Authority, unless a phased payment schedule has been agreed in writing, with the Planning Authority. This charge has been calculated using the Development Contributions Scheme adopted by Galway County Council in accordance with the provisions of Section 48 of the Planning and Development Act 2000 (as amended): The makeup of this sum is detailed in the list below:

$$6152\text{sqm} \times €21.50 = €132,268$$

3.2.Planning Authority Reports

There are two planning reports on file. The report assessed the following:

- Effluent treatment to be carried out in accordance with parameters of a discharge license as detailed in the Hydro Geological Assessment.
- Details of surface water detail is considered satisfactory.
- Details of water supply connection is required.
- A revised road safety Audit is required.
- The design is acceptable in the context of the substantially scaled existing building on site.
- A further information request was sought in relation to sightlines, road safety audit and internal road junctions. Sightline drawings are sought to be in compliance with DM standard 28 of the County Development Plan.
- Further details in relation to SUDS measures are also sought.

- Upon receipt of further information the planning authority having assessed the additional details considered the proposal was acceptable and in accordance with Galway County Development Plan standards.
- By inference, the site can be deemed as within Flood Zone C, based on the OPW “Planning System and Flood Risk Management Guidelines”. The development is considered appropriate for its flood zone classification

3.2.1. Other Technical Reports

- Roads and Transportation Dept sought further information in relation to sightlines, road safety audit and internal road junctions. Sightline drawings are sought to be in compliance with DM standard 28 of the County Development Plan.
- A revised Road Safety Audit and Traffic and Transport Assessment is required by way of further information
- Revised detail relating to onsite SUDS measures are required.

3.3. Prescribed Bodies

- None

3.4. Third Party Observations

Objection concerns to the present traffic hazard at the R339 Monivea Road, where it connects with the L-7109. Concern with the lack of visibility splays available at the junction constitute a traffic hazard and do not meet the required standards dictated by the Galway CDP.

Unauthorised walls also block visibility.

Percolation test was carried out over 14 years ago.

4.0 Planning History

- PA reg ref 21829 – Refused: extensions and alterations to factory premises and site and entrances at Cashla, Athenry to include the following: - A.

Machine Shop and Canteen to South Elevation. B. Switch Room & Compressor Room...

- PA reg ref 20/1221: Refused: Retention and completion of extension to industrial premises (C& F Tooling);
- Pa reg ref 14/284: Refused: Extension of duration - Permission for development comprising of 1. construction of new industrial unit to rear of existing building, 2. enlargement of site boundaries 3. construction of fire escape stairwell at front of existing building, 4. construction of additional external fire exit doors, 5. construction of roof enclosure to existing loading area, 6. installation of effluent treatment plant and associated percolation area, and retention permission for development comprising of 1. extension comprising of additional ancillary storage areas to rear 2. extension to side of existing industrial unit, completion & construction of additional car parking area (gross floor space 6900sqm proposed 2256.45 retained) (Previous reference number 09/386) (C & F Tooling);
- PA reg ref 13/1242: Granted: Permission for retention of (1) Security hut and Control Barrier, (2) Retention of car park and fencing. (3) Retention of enlargement of Testing Compound for Wind Turbines, (4) Permission for revised entrance (goods entrance) on North Side of site, (5) Permission for New Entrance, Security Hut and Control Barrier to South side of site, All the above at factory premises ((C & F Tooling); Northern entrance reinstated under this permission as a goods entrance, with a new relocated and designed southern entrance also.
- PA reg ref 11/334: Granted: Permission for retention of wind turbine testing and research compound to rear of factory (C & F Tooling);
- 09/386: Granted: Permission for development comprising of 1. construction of new industrial unit to rear of existing building, 2. enlargement of site boundaries 3. construction of fire escape stairwell at front of existing building, 4. construction of additional external fire exit doors, 5. construction of roof enclosure to existing loading area, 6. installation of effluent treatment plant and associated

percolation area, and retention permission for development comprising of 1. extension comprising of additional ancillary storage areas to rear 2. extension to side of existing industrial unit, 3. completion & construction of additional car parking area (C & F Tooling); A relocated northern entrance was conditioned with the closing up of the southern entrance.

5.0 Policy Context

5.1. Galway County Development Plan 2022 to 2028

4.13 Commercial Developments in Rural Areas

Rural businesses and enterprises are an important source of local employment in the County. Many examples of fine rural businesses exist throughout the county. This includes agricultural, equine, engineering/manufacturing, recreational, tourism, energy/renewable energy, and rural resource-based enterprises. Whilst the plan supports such enterprises and the diversification of the rural economy, it is also recognised that a balance is required between supporting rural based enterprises and projects and protecting the local environment.

In the first instance, new employment related developments are directed to settlements where services are available, and lands have been identified for employment uses. It is also recognised that there are instances where a development can be more readily accommodated or is more appropriate to a rural area. This can be due to a locational specific, or resourced based development, or a development of regional or national importance.

In relation to the expansion of an existing rural enterprise, consideration will be given to the scale of the existing and proposed development, the capacity of local infrastructure to accommodate the expansion, and the compatibility of the development with the surrounding area.

Section 6.5.3.2 Non-National Roads

In order to maintain the efficiency and functionality of the regional road network it is important that the number of new accesses and the intensification of existing accesses are restricted. These restrictions minimise risks to road safety as new entrances can result in additional stopping and turning movements, which give rise

to the potential for additional traffic accidents. Where a National Road is declassified to Regional Road status during the lifetime of the plan it shall become a Restricted Regional Road.

DM Standard 28: Sight Distances Required for Access onto National, Regional, Local and Private Roads

Vehicular entrances and exit points must be designed by the developer as part of a planning application with adequate provision for visibility so that drivers emerging from the access can enjoy good visibility of oncoming vehicles, cyclists and pedestrians. Where a new entrance is proposed, the Planning Authority must consider traffic conditions and available sight lines. Road junction visibility requirements shall comply with Geometric Design of Junctions (priority junctions, direct accesses, roundabouts, grade separated and compact grade separated junctions) (DN-GEO-03060) for rural roads and Design Manual for Urban Roads and Streets for urban roads (including any updated/ superseding document). Where substantial works are required in order to facilitate the provision of adequate sight distances lands within the sight distance triangles shall be within the control of the applicant and shall be subject of a formal agreement with the adjacent landowner which ensures certainty that the applicant is in a position to comply with the relevant condition and or standard.

DM Standard 33: Traffic Impact Assessment, Traffic & Transport Assessment, Road Safety Audit & Noise Assessment

All new road layouts should be designed in accordance with the Design Manual for Urban Roads and Streets (DMURS) and the associated TII publications.

Development proposals should also include provision for a sustainable modal split, with pedestrian and cycling facilities recognised as an important aspect of new design proposals.

All significant development proposals, or those that the Planning Authority consider would pose a safety risk or traffic impact shall be accompanied by road safety audits, road safety impact assessments and transport and traffic assessments. These shall include a consideration of the cumulative impact of development on the road network.

5.2. Natural Heritage Designations

Galway Bay Complex SAC 5.1km

Inner Galway Bay SPA 5.1km

6.0 EIA Screening

Class (10)(b) of Schedule 5 Part 2 of the Planning and Development Regulations 2001 (as amended) provides that mandatory EIA is required for the following classes of development:

Class 10 Infrastructure Projects (b) (iv)

Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.

The site area is stated at 8.37ha and is located on an existing brownfield site that has been heavily modified. The site is not located in a business district and currently constitutes an existing industrial complex in a rural location. The site area is, therefore, well below the applicable threshold of 20 hectares.

As per the criteria set out within Schedule 7 of the Planning and Development Regulations 2001 (as amended)), as to whether a development would/would not have a significant effect on the environment. The retention of existing shed structures and provision of new entrance and surface water measures will not have an adverse impact in environmental terms on surrounding land uses. It is noted that the site is not located within an area of landscape sensitivity or of natural or cultural heritage. The potential for potential effects on any European Site will be assessed under Section 8.0 below.

Having regard to: -

- The nature and scale of the proposed development, which is under the mandatory threshold in respect of Class 10 - Infrastructure Projects of the Planning and Development Regulations 2001 (as amended),

- The location of the site outside of any sensitive location specified in Article 109 of the Planning and Development Regulations 2001 (as amended) and the mitigation measures proposed to ensure no connectivity to any sensitive location.
- The guidance set out in the “Environmental Impact Assessment (EIA) Guidance for Consent Authorities regarding Sub-threshold Development”, issued by the Department of the Environment, Heritage and Local Government (2003), and
- The criteria set out in Schedule 7 of the Planning and Development Regulations 2001 (as amended).

I have concluded that, having regard to the nature, scale and location of the subject site within an established industrial complex, the proposed development would not be likely to have significant effects on the environment. On preliminary examination, there is no real likelihood of significant effects on the environment, arising from the proposed development. The need for Environmental Impact Assessment Report (EIAR) can, therefore, be excluded at preliminary examination

7.0 The Appeal

7.1 This is a third-party appeal against the Decision of Galway County Council to grant permission. The Grounds of Appeal can be summarised as follows:

- The proposed development is accessed through a priority access junction (R339/L7109) which does not comply with DM standard 27 & 28 of the Galway County Development Plan
- The TII Geometric design of junctions have not been implemented with the submitted Traffic and Transport Assessment. Its stated the priority junction Stop line is not in accordance DN GEO 03060- TII publication Guidelines.
- Sections of the proposed site are not zoned residential

- Horizontal visibility splays are not in compliance with County Development Plan
- Vertical visibility splays are not in compliance with County Development Plan
- There is an over capacity of vehicles travelling through the R339/L7109 junction.
- The minimum circular corner radius is not available at priority access junction.
- A number of photographs have been submitted of the junction to indicate issues of poor sightlines.

7.2 Applicant Response

- The applicant sets out that Standard DM 27 does not apply to the development as the development is located along local country road L7109 and not a regional road as stated by the appellant.
- DM standard 28 does not apply to the regional road junction. The new entrance is not proposed on the R339 so therefore there is no requirement to show junction visibility on the regional road.
- The development does not form part of the national road scheme, the provisions of DN – GEO-03060 are not applicable to the proposed development.
- Given the long established principle of industrial/manufacturing use on site the industrial zoning designation is not relevant in this case.
- The Road Safety Audit did not raise an issue with adequacy of the visibility splays at the Regional Road junction. The TTA also states that visibility of traffic exiting onto the R3398 is adequate in both directions. Furthermore An Bord Pleanála under planning reference 308549 has recently accepted the adequacy of the visibility of the R339/L109 junction for the adjacent quarry extension.
- The Traffic and Transport Assessment indicate that there is adequate capacity for the R339/ L7109 junction in all scenarios.

7.3 Planning Authority Response

- None

7.4 Observations

- None

7.5 Further Responses

- None

8.0 Assessment

8.1 Having examined the application details and all other documentation on file, including the appeal, and having inspected the site and having regard to the relevant local policy guidance, I consider the main issues in relation to this appeal are as follows:

- Road Capacity and Road Safety
- Other Matters
- Appropriate Assessment

8.2 Proposed Development & Layout

8.2.1 Retention

Extensions to the existing C&F Tooling premises as follows:

- Machine Shop and Canteen (gross floor area - 792m²) ,located to the south of existing premises
- Switch Room and Compressor room (gross floor area - 96 m²) - located to the south of existing premises
- Maintenance Garage and Stores gross floor area - 673 m²) – located to the north and east of existing premises
- Monitoring Office Building (gross floor area - 444 m²) – located to the east boundary of the site

- Steel Cleaning Shop (gross floor area - 62.3 m2) – located to the north of existing premises
- Store (gross floor area - 20.3 m2) – located to the north of existing premises
- Machine Shop (gross floor area - 4,065 m2)- located to the south and east of existing premises
- retention permission is sought for the existing external Component Storage Area – located to the very east of the site.

The planning authority considered that the extensions for retention were acceptable owing to the existing extensive facility on site, the low landscape sensitivity and existing pre-existing use on site.

8.2.2 Proposed Development

8.2.3 The proposal includes for the relocation of existing traffic barrier at the existing vehicular entrance to the premises. The existing barrier is to be moved from the east of the site to the north of the existing HGV access. It is proposed that the existing access junction located at the northern boundary of the site will be permanently closed and a new access junction proposed at the southern boundary of the site. The new junction onto the L-7109 will provide access for all traffic, including all HGVs and all staff and visitor trips. All staff and visitor trips will park in 2 new car parks, a reception carpark with 33 spaces, and a main staff car park with 357 spaces, with a total of 390 parking spaces. HGVs will also gain access to the site via the new proposed access junction. HGVs will be separated internally from car/ HGV trips and will gain access to the rear of the site by means of an HGV access only which will be controlled by means of a security gate.

8.2.4 The area in front of the site is to be completely landscaped with existing car parking in front of the building to be moved to a new area. A new vehicular staff entrance is to be located on the western boundary of the site, and this is serviced by the L7109. The development includes for alterations to the existing staff car park to provide 357 no. car parking spaces to include the provision of EV charging and accessible car parking bays, and provision of a visitor car park to provide 31 no. car parking spaces (including EV charging and accessible car parking bays).

The planning authority considered upon receipt of further information in the form of Road Safety Audit and Traffic and Transport Assessment that the proposed development would not give rise to increased traffic in the area and the sightline drawings as provided are in compliance with DM Standard 28 of the County Development Plan.

8.3 Road Capacity & Road Safety

- 8.3.1 The third-party appeal primarily raises concerns regarding the capacity and safety of the priority junction between the Regional Road R339 and the local road L7109. The appellant asserts that the applicant has not provided adequate sightline details as required by DM Standard 28 and DM Standard 27 of the Galway County Development Plan (2022-2028) for this junction. Furthermore, the appellant highlights that due to existing tooling premises and the adjacent quarry, the junction between the R339 and L7109 lacks sufficient capacity to accommodate additional traffic. Additionally, the appellant claims that sightlines are obstructed due to boundary walls and the current road layout. For clarity, I will address the concerns regarding road capacity and traffic safety separately. It is important to note that the proposed access to the C&F Tooling site is located off the L7109, approximately 1 km south of the R339/L7109 junction. There is no direct access from the site to the regional road, R339. However, the Traffic and Transport Assessment (TTA) submitted by the applicant does account for the R339/L7109 junction in its traffic impact analysis.
- 8.3.2 The appellant has expressed concerns regarding the potential traffic impact on the local road network, particularly at the priority junction between the R339 and L7109. The applicant has provided a Traffic and Transport Assessment (TTA), prepared by Alan Lipscombe Traffic and Transport Consultants. I have thoroughly reviewed the TTA and considered the methodology employed for data collection. Based on this review, I am satisfied that the TTA adheres to best practices, as outlined in the Traffic and Transportation Assessment Guidelines (2014), published by Transport Infrastructure Ireland (TII).
- 8.3.3 The TTA provides a comprehensive analysis of the study area, which includes the priority junction between the Regional Road R339 and L7109, as well as the C&F Tooling premises and the L7109. Background traffic data was collected over a 24-

hour period on Thursday, November 9, 2023, at both the R339/L7109 junction and the proposed C&F Tooling access point. In addition, data from a continuous Automatic Traffic Counter (ATC) maintained by TII on the N6 east of Galway was used to determine seasonal adjustments to the traffic counts recorded in September 2023. The TTA applies a 2% seasonal adjustment to the September 2023 traffic data, based on the monthly traffic profile observed in the busiest month of July.

8.3.4 The key findings from the seasonally adjusted traffic data are as follows:

- The AM peak hour occurred between 07:30 and 08:30, while the PM peak hour occurred from 16:15 to 17:15.
- The maximum 2-way traffic volumes on the R339 were recorded as 606 PCUs (passenger car units) during the AM peak hour and 618 PCUs during the PM peak hour.
- Traffic flows on the L7109 just south of the R339 were observed to be 196 PCUs during the AM peak and 184 PCUs during the PM peak.
- Traffic flows on the L7109 just north of the C&F Tooling site were similar, with 192 PCUs observed during the AM peak and 181 PCUs during the PM peak.
- The existing C&F Tooling access point observed 107 PCUs during the AM peak and 119 PCUs during the PM peak.

8.3.5 The TTA forecasts traffic growth based on Transport Infrastructure Ireland (TII) medium-range growth factors. Between 2023 and 2025, traffic is projected to grow by 5.2%, and by 31.3% between 2023 and 2040. These growth factors account for increased traffic due to local development, economic activity, and car ownership, but do not account for potential reductions in traffic due to factors such as increased remote working.

8.3.6 The traffic generation potential of the development was estimated using the PICADY software, which assesses junction capacity by evaluating traffic volumes and movements. The model assesses key performance indicators such as queue lengths, ratio of flow to capacity (RFC), and delays. The following scenarios were tested for both the AM and PM peak hours:

- Existing C&F Tooling facility for the opening year of 2025 and the future year of 2040.

- Proposed C&F Tooling extension for the years 2025 and 2040.
- Proposed C&F Tooling extension, plus the granted battery storage plant, Coshla Quarry extension, and the Barrettspark quarry infill development (cumulative impact).

8.3.7 Results for R339/L7109 Junction

The capacity test results for the R339/L7109 junction, for both the AM and PM peak hours, are detailed in Tables 13 and 14 of the TTA. Key findings include:

- By the year 2040, the maximum ratio of flow to capacity (RFC) for traffic accessing the R339 from the L7109 during the PM peak hour is forecast to reach 51.3% with the existing level of development at C&F Toolings.
- This is expected to increase to 57.0% with the proposed C&F Tooling extension, and to 73.3% with the inclusion of the battery storage facility, Coshla Quarry extension, and Barrettspark infill development.
- With the acceptable RFC threshold being 85%, the R339/L7109 junction is expected to operate well within capacity for all future scenarios.

8.3.8 Proposed Access Junction Capacity

The proposed access junction for the C&F Tooling development is located off the L7109. The majority of traffic entering the site during the AM peak will be left turns, which are unopposed. However, the critical movement occurs during the PM peak hour, when traffic must turn right out of the site onto the L7109. For this movement, the RFC is forecast to reach 27.2% with the existing C&F Tooling development, increasing to 32.9% with the proposed extension, and 34.3% with the additional developments (battery storage, Coshla Quarry extension, and Barrettspark infill). This remains well within the 85% RFC limit specified by TII guidelines.

8.3.9 The findings of the Traffic and Transport Assessment and the supporting data suggest that the anticipated traffic impact of the development will not result in significant disruption. Both the R339/L7109 junction and the proposed access junction for the C&F Tooling site are projected to operate within their respective capacity limits for all development scenarios up to 2040. The proposed new access is designed in compliance with current TII and Galway County Development Plan guidelines, with appropriate visibility splays provided for actual speeds.

8.3.10 Based on the information presented, I am satisfied that the proposed development will not have a significant adverse impact on local traffic conditions. The traffic impact can therefore be deemed manageable and compliant with Galway County Development Plan Policy Objective NNR 6 and DM Standard 33 regarding Traffic Impact Assessment. Consequently, I do not consider traffic concerns to be a justifiable reason for refusal in this instance

8.3.11 Road Safety

8.3.12 Existing Site Access and Proposal for New Junction:

The current access to the site is via a junction on the L-7109 located at the northern boundary of the site. This existing junction serves all traffic, including staff, visitors, and deliveries, as well as HGVs of various types. However, due to a significant restriction in visibility to the north along the L-7109 for vehicles exiting the site, it is proposed to permanently close the current access and introduce a new, single access junction that will accommodate all traffic generated by the existing C&F Toolings site and the proposed extension.

8.3.13 An assessment of the western site boundary was carried out to identify the most optimal location for the new access junction. The 100m straight section of the L-7109 just south of the existing junction was ruled out due to its proximity to the existing building line, which would prevent the safe construction of a new access junction. The area south of this straight section, where the road bends eastward, was identified as the only feasible location for the proposed new junction, given the existing site constraints and visibility requirements.

8.3.14 The proposed new access junction on the L-7109 includes the following key features:

- A junction designed to accommodate all vehicle types, including HGVs, with 9m radii to facilitate HGV movements.
- A 7.0m wide access road to accommodate all vehicle types.
- Localised widening of the L-7109 on its eastern side, both to the north and south of the proposed access junction, to achieve a 6.0m wide carriageway in the immediate vicinity of the junction.

- The installation of STOP markings and signs in accordance with the Traffic Signs Manual, including Centreline RM001, STOP line RRM 017, STOP lettering M114, and STOP sign RUS 027.

8.3.15 The speed limit on the L-7109 is 80 km/h. Speed surveys have been conducted, and based on the 85th percentile speeds, sightlines have been provided for a design speed of 70 km/h (with an x distance of 2.4m), as required by DM Standard 28 of the Galway County Development Plan. Full sightline drawings of 70m have been provided, in compliance with the development plan's requirements. Greater sightlines could potentially be achieved; however, the provided sightlines are deemed to be fully compliant with DM Standard 28.

8.3.16 A road safety audit has been carried out for the proposed access and internal layout of the site. The audit identified two issues: the proposed new junction with the L-7109 and lighting columns within the car park. The applicant has provided alternative measures to address these concerns, and these revisions have been incorporated into the updated site layout. Based on this revised layout and the provided safety audit, I am satisfied that there are no outstanding road safety concerns regarding the proposed access junction on the L-7109. Additionally, the sightline drawings meet the requirements set out in the Galway County Development Plan.

8.3.17 Concerns Regarding the L-7109/R339 Junction:

The appellant has raised concerns regarding the priority junction between the L-7109 and the R339, approximately 1 km north of the site. It is asserted that the junction does not meet the requirements of DM Standards 27 and 28 of the County Development Plan, nor the TII Geometric Design Guidelines (DN-GEO-03060) for junctions. However, it is important to note that this junction is not directly connected to the subject site, and the applicant does not propose any development at or near this junction. The R339 is a Restricted Regional Road as set out in Table 6.3 of the County Development Plan. Section 6.5.3.2 of the Development Plan seeks to restrict new access and prevent intensification of existing accesses. I do not consider the L7109/R339 junction to be an existing access as indicated by the appellant, but a public road junction that is the responsibility of the local authority and other relevant bodies.

- 8.3.18 The Traffic and Transport Assessment (TTA) for the development states that visibility for traffic exiting onto the R339 is adequate in both directions. Furthermore, the junction is located over 1 km from the site and is entirely outside the redline boundary of the proposed development. The assessment indicates that the R339/L7109 junction does not present any immediate road safety issues that would impact the proposed development. The applicant has also demonstrated capacity at this junction to facilitate the proposed development. While I do not consider there any issues of road safety with regard to the priority junction referenced by the appellant, I consider the matters raised are outside the scope of the appeal, where the responsibility for the R339/L7109 junction lies with the local authority and other relevant bodies.
- 8.3.19 In light of the above, I do not consider that the adequacy of sightlines at the R339/L7109 junction, located over 1 km from the site, constitutes a justifiable reason to refuse planning permission for the proposed development. Furthermore, there are no road safety concerns with the proposed access junction on the L-7109, and the necessary traffic and safety assessments have been completed in full accordance with relevant standards. Consequently, I do not consider the issue of road safety to be a justifiable reason to refuse permission in this instance.

8.4 Other Matters

Zoning

- 8.4.1 The appellant contends that the site is not zoned for industrial use and, therefore, the proposed extensions should not be considered. The site is located outside any town boundary and is not subject to zoning provisions. However, there is a long-established history of planning permissions for industrial use on this site, dating back to the 1980s. The complex has expanded incrementally over the years and continues to operate as a significant manufacturing facility.
- 8.4.2 Section 4.13 of the Galway County Development Plan provides guidance on the expansion of existing rural enterprises, stating that:
“Consideration will be given to the scale of the existing and proposed development, the capacity of local infrastructure to accommodate the expansion, and the compatibility of the development with the surrounding area.” Additionally, DM

Standard 19 of the Development Management Chapter sets out criteria for assessing industrial and commercial development. This standard establishes a presumption that only appropriately scaled industrial processes, which do not cause nuisance or harm to the predominant residential environment of towns and villages, shall be permitted.

- 8.4.3 The existing manufacturing facility has been operational since the 1980s and currently comprises a gross floor area of 22,940 sqm. The gross floor space to be retained as part of the proposed development is 6,152.60 sqm, with the overall site area stated as 8.37 hectares. Given the substantial site area and the separation distance from the nearest residential properties, it is considered that there is sufficient capacity on-site to accommodate the proposed extensions and associated manufacturing activities.
- 8.4.4 The facility is fully operational, and there are no third-party submissions on file regarding noise, dust, or odour concerns. During the site inspection, noise levels were not deemed excessive, and there was no notable dust or odour emanating from the development. As outlined in Section 7.3 of this report, the local road network has adequate capacity to accommodate the additional traffic generated by the proposed development. No significant infrastructural constraints have been identified that would hinder the proposed expansion.
- 8.4.5 Having regard to the provisions of Section 4.13 of the Galway County Development Plan, it is considered that the proposed extensions align with the policy objectives for existing rural enterprises. The development is appropriately scaled, has adequate site capacity, does not give rise to environmental nuisance, and is supported by sufficient local infrastructure as required under DM standard 19 of the Galway County Development Plan. Accordingly, the development for retention and the proposed development is considered acceptable in principle.

8.5 Flood Risk/ Surface Water

The subject site is located within an identified flood risk area, as indicated by Galway County Council's MapInfo data (pluvial). In response, a Site-Specific Flood Risk Assessment (SSFRA) has been submitted as part of the current application. Additionally, the site boundary has been amended as part of this application.

The SSFRA states that there is no anecdotal or recorded history of flooding in the vicinity of the proposed development. A review of historic Ordnance Survey (OS) mapping does not identify any previous flood events on the site. Correspondence with the Council's Area Engineer confirms that there are no records of historic flooding on the public road adjacent to the site. Ground levels along the public road range from +30.81mOD to +31.44mOD at the site boundary.

- 8.5.1 The Catchment Flood Risk Assessment and Management (CFRAM) mapping does not indicate that the site is at risk of flooding. However, the mapping does identify pluvial flood events in the general vicinity. Based on the OPW's "Planning System and Flood Risk Management Guidelines," the site can be classified within Flood Zone C. As such, the proposed development is considered appropriate for its flood zone designation.

Given the site's location, existing ground levels, and the estimated flood extents, it is considered that the development is unlikely to have any significant impact on flood storage capacity in the area.

Furthermore, it is noted that the Preliminary Flood Risk Assessment (PFRA) mapping is indicative only.

- 8.5.2 As part of the application the applicant proposes a significant upgrade of the surface water drainage system for the entire site. Langan Consulting Engineers have prepared a Drainage and Surface Water Report. This Report includes the following recommended SuDs features:

- Permeable paving to 30% of the proposed carpark areas.
- Outfalls to groundwater via an attenuation / infiltration pit.
- Rainwater harvesting proposal.
- demonstrates the full breakdown of the design basis for the hydrocarbon interceptor size adopted.

- the Drainage and Surface Water Report demonstrates that site investigation data, including infiltration tests, were used as a basis for the SuDs design. Infiltration tests data is included in the appendix of the Drainage and Surface Water Report. The attenuation storage is capable of catering for 1/100 return period storm events with 20% allowance for climate change.

8.5.3 Having considered the above detailed information provided related to Flood Risk and Surface Water, I consider that the development is compliant with DM Standard 68 with respect to Flood Risk and DM Standard 67 with regard to the provision of SuDS measures. The surface water measures, site location, and assessment results ensure that the development is consistent with best practices for flood risk management.

9.0 AA Screening

I have considered the proposal to retain existing extensions to manufacturing facility and provision of new access and new surface water drainage system in light of the requirements S177U of the Planning and Development Act 2000 as amended.

The subject site is located 5.1km from the nearest European Site Inner Galway Bay Complex SPA and 5.1km from Galway Bay Complex SAC.

The applicant has

Having considered the nature, scale, and location of the project, I am satisfied that it can be eliminated from further assessment because there is no conceivable risk to any European Site. The reason for this conclusion is as follows:

- scale and nature of the development]
- Location-distance from nearest European site and lack of connections

I conclude that on the basis of objective information, that the proposed development would not have a likely significant effect on any European Site either alone or in combination with other plans or projects. Likely significant effects are excluded and therefore Appropriate Assessment (stage 2) (under Section 177V of the Planning and Development Act 2000) is not required.

10.0 Recommendation

For the reasons outlined above, I consider that the proposal is in compliance with the proper planning and sustainable development of the area, and I recommend that permission is GRANTED subject to the following conditions.

11.0 Reasons and Considerations

It is considered that, subject to compliance with the conditions set out below, the development for retention and proposed development would be in accordance with DM Standard 28 of the Galway County Development Plan in relation to sightlines and stopping distance and DM Standard 33 in relation to Traffic and Transport Assessment. The proposal as set out would not have a detrimental impact on local traffic conditions, traffic safety or pedestrian safety and convenience. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

12.0 Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application to An Bord Pleanála on the 23rd July 2024, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development, or as otherwise stipulated by conditions hereunder, and the development shall be carried out and completed in accordance with the agreed particulars. In default of agreement the matter(s) in dispute shall be referred to An Bord Pleanála for determination.

Reason: In the interest of clarity

2. The development shall comply with the recommendations, summary and conclusions as set within

the Road Safety Audit and the plans and particulars submitted with the application on the 31st May 2024.

Reason: In the Interest of road safety.

3. (i) Sight distance triangles shall be maintained and kept free from boundary walling, vegetation or other obstructions that would reduce the minimum visibility required.

(ii) Any overhead lines and poles shall be set back in line with new proposed roadside boundary treatments at the developers expense before work commences on the development. No pole(s) shall be left in the sightline visibility triangles and/ or left isolated from the proposed development boundary treatments or whereby obstruct the view of the road of existing road users and/or persons accessing/exiting the site.

Reason: In the Interest of road safety.

4. Any proposed tie in works to the existing public road margins of the development shall be cleared, graded, levelled, dished and surfaced tarmacadam to a standard suitable for use to the satisfaction of the Area Engineer.

Reason: In the interest of road safety

5. (i) All surface water generated by this development shall be disposed of within the site and shall not be discharged onto the public road or the adjoining property.

(ii) Proposed development vehicular entrance and associated local widening onto the public road and any Tie in to the existing road margin shall be cleared, graded, levelled and surfaced to a standard suitable for use to the satisfaction of the Area Engineer to prevent unbound material (loose stone) entering onto the public road. Proposed Road make up and tie in to include suitable drainage infrastructure to collect and dispose of surface water runoff from the existing public road.

Reason: In the interest of traffic safety and the proper planning and sustainable development of the area

6. All necessary measures shall be taken by the applicant to prevent the spillage or deposit of clay, rubble or other debris on adjoining roads during the course of the works.

Reason: In the interests of road safety.

7. On completion of the development, a stage 3 road safety audit shall be completed by an independent road safety auditor, at the developer's expense, and submitted for the written approval of the planning authority. Any safety issues highlighted in the audit shall be reviewed and addressed by the developer at their expense.

Reason: In the interests of road safety.

8. Within 6 months from the date of grant of permission the applicant shall submit a detailed landscaping plan and associated site layout plan which shall provide for significant screening of the development from the roadside boundaries which shall include native species and a timeline for the implementation of same for the written agreement of the Planning Authority..

Reason: In the interest of proper planning and sustainable development.

9. No advertisement or advertisement structure, the exhibition or erection of which would otherwise constitute exempted development under the Planning and Development Regulations 2001 as amended, shall be displayed or erected on the buildings or within the curtilage of the site without the prior agreement of the planning authority.

Reason: In the interest of visual amenity.

10. Prior to commencement of development, the developer shall lodge with the planning authority a cash deposit, a bond of an insurance company, or such other security as may be acceptable to the planning authority, to secure the satisfactory reinstatement of the site upon cessation of the project coupled with an agreement empowering the planning authority to apply such security or part thereof to such reinstatement. The form and amount of the security shall be as agreed between the planning authority and the developer or, in

default of agreement, shall be referred to An Bord Pleanála for determination.

Reason: To ensure satisfactory reinstatement of the site.

11. The developer shall pay to the planning authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development Contribution Scheme made under section 48 of the Planning and Development Act 2000, as amended. The contribution shall be paid prior to commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any applicable indexation provisions of the Scheme at the time of payment. Details of the application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to An Bord Pleanála to determine the proper application of the terms of the Scheme.

Reason: It is a requirement of the Planning and Development Act 2000, as amended, that a condition requiring a contribution in accordance with the Development Contribution Scheme made under section 48 of

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

Darragh Ryan
Planning Inspector
28th February 2025

Form 1

EIA Pre-Screening

An Bord Pleanála Case Reference	320248-24		
Proposed Development Summary	Retention of existing extensions construction of a new entrance and new site layout		
Development Address	Cashla, Athenry, Co. Galway		
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (that is involving construction works, demolition, or interventions in the natural surroundings)	Yes	X	
	No		
2. Is the proposed development of a CLASS specified in Part 1 or Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended)?			
Yes	X	Class 10 Infrastructure Projects (b) (iv) Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.	Proceed to Q3.
No			
3. Does the proposed development equal or exceed any relevant THRESHOLD set out in the relevant Class?			
Yes			

No	X	The site area is stated at 8.37ha. The site is below the 20 hectares threshold.	Proceed to Q4
4. Is the proposed development below the relevant threshold for the Class of development [sub-threshold development]?			
Yes	X	The site area is stated at 8.37ha. The site is below the 20 hectares threshold. The threshold is based on location. The site is not located in an industrial estate or built up area.	Yes Form 2 required

5. Has Schedule 7A information been submitted?		
No	X	
Yes		

Inspector: _____

Date: _____

Form 2

EIA Preliminary Examination

An Bord Pleanála Case Reference	ABP-320248-24
Proposed Development Summary	Retention of existing extensions construction of a new entrance and new site layout
Development Address	Cashla, Athenry, Co. Galway
The Board carried out a preliminary examination [ref. Art. 109(2)(a), Planning and Development regulations 2001, as amended] of at least the nature, size or location of the proposed development, having regard to the criteria set out in Schedule 7 of the Regulations. This preliminary examination should be read with, and in the light of, the rest of the Inspector's Report attached herewith.	
Characteristics of proposed development (In particular, the size, design, cumulation with existing/proposed development, nature of demolition works, use of natural resources, production of waste, pollution and nuisance, risk of accidents/disasters and to human health).	For the purposes of EIAR screening the development is considered to fit under Class 10 (b) (iv). The development is located in a rural location and is an existing standalone manufacturing facility on a 8.37ha site. The use on site pertains to manufacturing of sheet metal for transportation and industrial purposes. The proposed development (construction impact) does not give rise to significant concerns in relation to use of natural resources, production of waste, pollution or noise nuisance. The proposed development is not exceptional in the context of existing environment.
Location of development	The development is located in a rural location and is an existing

(The environmental sensitivity of geographical areas likely to be affected by the development in particular existing and approved land use, abundance/capacity of natural resources, absorption capacity of natural environment e.g. wetland, coastal zones, nature reserves, European sites, densely populated areas, landscapes, sites of historic, cultural or archaeological significance).	standalone manufacturing facility on a 8.37ha site. There is a pre- existing manufacturing use on site. The proposal includes standard best practices methodologies for the control and management of wastewater and surface water on site. The site is not located in close proximity to High landscape amenity area, protected area or European Sites. The nearest European site is located 5.1km from the nearest European sites Inner Galway Bay SPA and Galway Bay Complex SAC.. There are no other locally sensitive environmental sensitivities in the vicinity of relevance.
Types and characteristics of potential impacts (Likely significant effects on environmental parameters, magnitude and spatial extent, nature of impact, transboundary, intensity and complexity, duration, cumulative effects and opportunities for mitigation).	The potential environmental impacts are construction impacts only. It is considered that the relocation of existing entrance and internal reconfiguration of the site layout, is not significant. All waste can be managed through standard waste management procedures. The red line boundary of the site remains the same. There is no extension to boundary as a result of proposed development. The site area is 8.37ha. There are no other developments under construction in proximity to the site. All other development are established uses.

Conclusion		
Likelihood of Significant Effects	Conclusion in respect of EIA	Yes or No
There is no real likelihood of significant effects on the environment.	EIA is not required.	No - EIAR is NOT required
There is significant and realistic doubt regarding the likelihood of significant effects on the environment.	.	
There is a real likelihood of significant effects on the environment.		

Inspector:

Date:

DP/ADP: _____

Date: _____

(only where Schedule 7A information or EIAR required)