



Development

Retention and permission for industrial units, change of use, and amendments to previously granted permissions, with all associated works.

Location

Roxborough, Roscommon, Co. Roscommon.

Planning Authority

Roscommon County Council

Planning Authority Reg. Ref.

2460028

Applicant(s)

Ross Engineering Limited

Type of Application

Retention and Permission

Planning Authority Decision

Grant Permission

Type of Appeal

Third Party

Appellant(s)

Edward Harte

Observer(s)

None

Date of Site Inspection

25th November 2025

Inspector

Yolande McMahon

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1.0 Introduction and Background

- 1.1. This report is an Addendum report to the Inspector's report in respect of ABP-321335-24 dated 21st March 2025.
- 1.2. In a Board Direction dated 04/04/2025, the Board decided to 'defer consideration of this case and to issue a Section 132 notice to the applicant regarding the following information which the Board considered may be necessary for the purpose of enabling it to determine the appeal.'
- 1.2.1. The applicant was required to provide:
 1. *Detailed observations as to how the development proposed, and proposed to be retained, constitutes 'light industrial use' having regard to the definitions contained within the provisions of the Planning and Development Regulations 2001.*
 2. *Detailed scaled drawings showing the location of existing bored well, and the drainage layout of wastewater from both Unit 1 and Unit 2. The submitted drawing A2, includes no wastewater drainage layout from Unit 1.*
 3. *Details of the (i) processed water/effluent or other liquid byproducts, and (ii) air emissions, fumes or odours, that are generated, if any, as a function of the applicant's engineering technology processes. The details submitted by the applicant are required to address volumes and frequency, as appropriate, and to include relevant drawings including HVAC equipment, duct work, piping etc with detailed dimensions and explanatory legend/annotation.*
 4. *An updated and fully completed Site Characterisation Form, including subsurface percolation testing and surface percolation testing, clearly demonstrating the suitability of the proposed onsite wastewater treatment system and percolation area.*
- 1.2.2. A further Board Direction was issued on the 09/06/2025. The submissions on the file and the Inspector's report were considered at a Board meeting held on the 09/06/2025. The Board decided that in the particular circumstances of the appeal, it was appropriate in the interests of justice to defer consideration, and to request the appellant to make an observation on the following matter which has arisen in relation

to this appeal: the submission, with enclosed report and drawings, received from the applicant on the 3rd June 2025.

2.0 Response to Board's Correspondence

2.1. Applicant Response

2.1.1. The applicant's agent submitted a response to the Board's request which was received on the 3rd June 2025. The applicant's response can be summarised as follows:

2.1.2. Response to Item 1

2.1.3. The applicant states that the operations fall under four key areas which are all conducted within enclosed buildings as follows:

2.1.4. ***Light Gauge Structural Steel Fabrication*** – this involves the production of lightweight structural components including balcony framing, modular framing systems, cladding supports, and equipment support systems; the fabrication of modular units, electrical containment supports and mechanical support frameworks which can be tailored for integration in data centres, residential and commercial applications; structural steel framing for non-loadbearing and secondary steel systems using precision CNC-controlled machinery operating on galvanised sheet steel.

2.1.5. ***Architectural Steel Fabrication*** – these include architectural features such as handrails, stringers, balustrades, kicker plates and soffit supports. Manufactured using small-scale, low-vibration equipment with minimal environmental or noise impact. No external fabrication finishing activities.

2.1.6. ***Specialist Stainless Steel Fabrication*** – precision manufacturing of stainless-steel items including balcony trims, canopies, and internal fit-out elements. Manufacturing methods include TIG welding, fine finishing and orbital polishing, all within ventilated workspaces fitted with local extraction and HEPA filtration systems. Processes are controlled and emission-free.

2.1.7. ***Contract Manufacturing*** – Ross Engineering acts as a partner to larger structural steel and architectural contractors, delivering bespoke components for integration into wider project assemblies. All work is carried out off-site in a controlled environment, with finished goods delivered for installation by third parties.

2.1.8. The applicant states that the use complies with a 'light industrial use' definition for the following reasons:

- All operations are enclosed and low-impact.
- Ventilation systems ensure clean air, minimal emissions and quiet operations.
- No external cutting, welding or coating takes place.
- Minimal light commercial and HGV vehicle access and movements.
- Working hours are restricted to daytime business only (no night or weekend shifts).
- Waste is managed and stored in a small, screened area with no stockpiling.

2.1.9. **Response to Item 2**

2.1.10. A site layout plan (1:500 scale) has been submitted showing the bored well location and foul sewer drainage from building 1 and 2.

2.1.11. **Response to Item 3**

2.1.12. In response to Item 3 (i) details on processed water/effluent or other liquid byproducts, the applicant states the following:

- No water-based processes or coolant systems are used.
- Cutting and fabrication methods are entirely dry, with no chemical or effluent discharge.
- There is no requirement for an external effluent treatment system.

2.1.13. In relation to Air Emissions, Fumes, or Odours the applicant responded as follows:

- All machinery has integrated localised filtration and extraction systems.
- These capture particulates and fumes at the source, maintaining air quality.
- No paint spraying, chemical finishing, or solvent-based processes are conducted.
- Given the low volume and nature of fumes, a centralised extraction system is not required.

- Air quality is monitored internally, and no detectable odours are produced externally.

2.1.14. **Response to Item 4**

2.1.15. The applicant stated that a fully completed Site Characterisation Form, including surface and subsurface percolation test results was submitted as part of the original application and completed by Coyle Environmental Ltd. This information was resubmitted as part of the response to Item 4.

2.2. **Third Party Response**

2.2.1. A submission was received from the appellant Edward Harte dated 7th July 2025. The issues raised in the submission are summarised below:

Planning History

- Reference made to the two structures on site and the unauthorised use of one of the structures.
- After applying for permission in 2023, applicant engaged in extensive works on Unit 1 including removal of internal walls, removal and replacement of the floor to a lower level in order to install metal presses, welders (lasers) and extensive alterations to the façade of the building's exterior.
- Applicant removed thousands of tonnes of soil at rear of grey building (Unit 1) and replaced with hardcore.

Water and Wastewater

- Deterioration in the quality of appellant's well water which overwhelmed their water treatment system. (Appendix 1 of appellant's response includes source water readings for 2009 & 2024).
- Material removed was spread out on neighbouring property causing the topography of the land to be altered between two and three feet over two acres.
- Pipes were laid from their site to adjacent drainage ditches where no drains existed before.

- Appellant states that there has always been a difficulty with the soil in this area in terms of absorption/water soakage ability and this has been raised in every planning application.
- In order to increase their site drainage, underground drainage pipes from their site into an open ditch drain behind appellant's property were installed (location indicated on Appendix 2 of appellant submission). Water pooling now occurring in ditches at the end of the appellants property (photos 4a and b provided).
- Applicant now installing ground drainage pipes around their site, which will alter surface water flow and may damage the aquifer irreversibly.
- While the relocation of the wastewater treatment system to the southern end of the site is considered an improvement, it would be preferable to pipe to the mains system further down the L1805.
- Inaccuracies noted in the Site Characterisation Form & percolation testing – no mains water supply – now to be their own well; water flow direction stated as potentially south – more north-easterly; drainage ditches stated none on site – there were; stated that no wells within 250m as per GSI mapping – appellants registered bore well not shown.

Proposed/Existing development

- Definition of light industrial use given by the agent as defined in the Planning and Development Regulations 2001 – while visual impact is not mentioned in the definition, the structure is considered to be an ugly structure with no attempt to screen it with soft landscaping and trees.
- Existing natural hedgerows were removed between appellants property and site, increasing noise levels on site from Unit 1.
- No other similar type building within the area.
- Questions the validity of light engineering taking place given the size and scale of the buildings on site – Unit 1: 2,792 sqm; Unit 2: 878 sqm; Storage shed: 1,162 sq.m.
- Appellant disagrees with the statement that 'all operations are enclosed and low impact' – noise starts from 7am from the 3 phase generators followed by

external venting from compressors within the grey building (Unit 1) and banging/hammering of metal taking place outside the building.

- Observed instances of metal being cut up externally.
- Site work has restarted on installing drainage pipes with the noise growing exponentially.
- The statement that the working hours are restricted to daytime business use is considered an imprecise use of words – instances where manufacturing continues until 20.00- 20.30 pm and also instances on Saturdays and bank holidays.

Transportation Issues

- Given the volume of floor space sought there will be a serious increase in traffic.
- RCC conditioned vehicles to exit the site left via the L1805 onto the L1806 and onto the N63. The latter junction is regularly the site of multi-vehicle road accidents. A right turn onto the L1805 towards town would be a much safer option.

2.3. Planning Authority Response

2.3.1. No further response was received from Roscommon County Council.

3.0 Policy Context

3.1. Local Policy

3.1.1. Roscommon County Development Plan 2022-2028 (CDP)

3.1.2. The Roscommon County Development Plan 2022-2028 remains the operative plan for the assessment of this appeal.

3.1.3. Roscommon Town Local Area Plan (LAP) 2024-2030

The Roscommon Town LAP was formally adopted on the 25th July 2024. In relation to industry and enterprise, the Plan states that owing to its accessibility and availability of serviced zoned lands, the town is well placed to capitalise on attracting further new industry and enterprise. The Plan supports opportunities for further growth through the

zoning of sufficient quantities of land for Strategic Industrial and Enterprise development.

3.1.4. This Plan aims to foster opportunities to further develop the overall economic and employment base of the area, with the 'Strategic Industrial /Enterprise' zone providing appropriate zoning to facilitate opportunities for investment at both micro and macro level in industry and enterprise.

4.0 Planning History

I have reviewed the planning history relevant to the site since the original Inspector's report, and note the following decision made:

4.1. **Appeal site:**

4.1.1. **ABP-321025-24 (PA Reg Ref. 2460362)** – The proposed development sought (1) Permission to retain as constructed retaining wall and ESB substation along northern boundary and western boundary, (2) permission to complete retaining wall to western boundary and to construct pumphouse for on-site water supply, and (3) permission to retain temporary site offices/storage containers and pump house which are required for the duration of the construction phase and carry out all ancillary site development works. Permission was Granted on the 8th May 2025 subject to six (6) conditions.

Conditions of note include:

4.1.2. Condition 2 - This permission authorises the retention of identified temporary site offices and storage containers on site on a temporary basis, for a maximum period of five years from the date of this Order, after which time they shall be permanently removed from the property and the land shall be restored to its original condition.

4.1.3. Condition 3 – Drainage arrangements, including the attenuation and disposal of surface water, shall comply with the requirements of the planning authority for such works and services. Prior to commencement of development, the developer shall submit details for the disposal of surface water from the site to the planning authority for the written agreement.

4.1.4. Condition 4 – Construction Management Plan to be submitted.

- 4.1.5. Condition 5 – Construction hours.
- 4.1.6. Condition 6 – Financial contribution
- 4.1.7. Note: It was considered by the Inspector that the application to retain infrastructure and temporary offices on the site was considered a separate appeal and although related to the current appeal Ref. 321335, it falls to be considered in its own right.

4.2. **Natural Heritage Designations**

Corbo Bog SAC (Site Code 002349) c.3 km distance to the east and Lough Ree SAC (Site Code 000440) c.4 km distance to the south-east are the nearest Natura sites.

4.3. **EIA Screening**

The proposed development has been subject to preliminary examination for environmental impact assessment (refer to Form 1 and Form 2 at the end of this report). Having regard to the characteristics and location of the proposed development and the types and characteristics of potential impacts, it is considered that there is no real likelihood of significant effects on the environment. The proposed development, therefore, does not trigger a requirement for environmental impact assessment screening and an EIAR is not required.

5.0 **Assessment**

5.1. **Introduction**

- 5.1.1. The following assessment has considered the proposed development in the context of the provisions of the current Roscommon County Development Plan (i.e. 2022-2028). In addition, regard is given to the submissions of both the applicant and the third party appellant. The core issues associated with the proposed development can be dealt with under the following headings:
 - Principle of Development
 - Water and Wastewater Disposal
 - Residential amenity

- Other matters

5.2. Principle of Development

- 5.2.1. Chapter 6 of the CDP sets out the policy objectives for the economic development of Roscommon. The CDP seeks to promote economic activity in town and village centres by setting out a policy position to attract new businesses and consolidate existing ones. The CDP seeks to ensure that sufficient and suitable land is reserved for new industry/enterprise development and other employment uses in a range of sizes at key locations throughout the county (Policy Objective ED6.1). These locations are shown on the zoning maps for the various towns and villages within Roscommon.
- 5.2.2. Roscommon Town is a designated key town and a primary growth centre in terms of the Core Strategy and is the nearest large town to the appeal site, located approx. 3 kilometres to the south-west. The policy position for Roscommon Town is to *support the economic development of the town, promote a strengthening of its position as a centre of enterprise and employment*‘ (Section 2.7 of the CDP).
- 5.2.3. Lands within Roscommon Town have been specifically zoned for ‘*Strategic industrial/enterprise zones*’.
- 5.2.4. Having regard to the CDP, there is a clear policy framework for the location of enterprise and employment uses on zoned and serviced lands within the county as defined by the Core Strategy.
- 5.2.5. The appeal site is located on unzoned, unserviced lands within a rural area.
- 5.2.6. Section 6.3 of the CDP sets out the role of Rural Roscommon, with the Plan seeking to accommodate proposals for small scale enterprise in rural areas, including the suitable expansion of existing facilities, subject to relevant planning considerations, including demonstrating that the nature of the activity is appropriate to the rural area and evidence that it cannot be accommodated on zoned land in the towns within the county.
- 5.2.7. The Planning Authority at Further Information (FI) stage requested the applicant to provide details as to why the proposed development was not more appropriately located on lands zoned for such use.

5.2.8. In response the applicant provided a justification for the proposed development under three key areas –

- Community integration and contribution – existing location offers skilled labour pool, reliable stockists, suppliers and skilled service providers. By reinvesting in this area the applicant aims to contribute further to its economic growth and development.
- Improvements and modernisation – the premises that were purchased came with retention issues and non-compliance, and the applicant is seeking to modernise the premises, improve its energy efficiency and improve its aesthetic appeal for the benefit of local residents.
- Economic contribution – estimated that their operations contribute approx. €1.8 to €2.2 million per annum to the local economy.

5.2.9. The applicant considers that the development is in compliance with a number of policy objectives in the CDP, namely Policy Objectives ED6.9, ED6.10 and ED6.11.

5.2.10. The Planning Authority considers '*that there is a track record of commercial/manufacturing activity at a comparable nature and scale to that proposed, which was previously permitted and operating in these buildings and in light of this it is considered the nature of the activity is appropriate at this location.*'

5.2.11. The Planning Authority also considered that the proposal would facilitate the continued use of an existing structure which would otherwise remain vacant and is therefore in compliance with Policy Objective ED6.11 which states: '*Facilitate new commercial uses for vacant or derelict buildings, including buildings in rural areas, subject to compliance with appropriate planning and servicing requirements.*'

5.2.12. Having reviewed the justification provided, I do not consider that the proposal can be considered under Policy Objectives ED6.9 or ED6.10. The current use on the site is not a rural resource-based industry as required by ED6.9 or an extension to an existing small-scale, rural based, indigenous activity as facilitated by ED6.10.

5.2.13. While the proposed/retention use will generate employment as well as having an economic value, I do not consider that the current use requires a rural location in which to operate and the use would be more suitably located on zoned industrial lands within the county.

5.2.14. While I acknowledge that there was an established industrial use on this site, i.e. the industrial storage unit (Unit 1) and a mineral water bottling plant (Unit 2), which was linked to the water supply source at this location. I do not consider that it is comparable to the nature and scale of the current use on site. While ED6.11 facilitates new commercial uses for vacant buildings in rural areas, the current units on site have been expanded significantly (by c.2,200 sq.m.) without the benefit of planning permission, with the gross floor space of existing buildings on site now totalling 3,178 sq m (as per the application form), with 30 no. employees on-site. A further expansion of Unit 1 for welfare facilities and a stand-alone storage unit of 1,162 sq.m is also proposed; the installation of a new wastewater treatment system, additional car parking and upgrade of existing entrance. In my opinion, I consider that an intensification of use has occurred on the site, based on the following:

- The significant increase in size and scale of both units from what was originally permitted.
- The proposed addition of a large, detached machinery storage unit to the rear of the site. (1,162.64 sq.m).
- The activities taking place on site which includes cutting, welding and the specialised machinery being used.
- The extent of the external yard area which is currently being used to store materials.
- The number of employees (30) and the level of car parking proposed (43).
- The extensive lighting upgrades required in order to service both buildings and the curtilage of the site.

5.2.15. I do not agree that in order to facilitate the continued use of an existing vacant unit that such intensification of industrial use is warranted at this location. To grant such development would be contrary to the provisions of the development plan which seek to accommodate proposals for small scale enterprise in rural areas, subject to relevant planning considerations including demonstration that the nature of the activity is appropriate to the rural area and evidence that it cannot be accommodated on zoned land in the towns within the county.

5.2.16. Light Industrial Use

5.2.17. Having reviewed the planning history for this site, I am of the opinion that an industrial use has been established on the site for approx. 28 years, since 1997. The initial industrial use permitted on site was for a mineral water bottling plant/stores/offices (Unit 2, smaller unit) which was granted in 1997. An extension to the plant was granted in 2001. Planning permission was granted in 2003 for industrial storage use in Unit 1, the larger of the two units. Retention permission for the building and proprietary treatment unit as constructed and production unit was refused in 2005.

5.2.18. The applicant stated that they began operations in 2019 and are seeking to regularise the current use and the amendments made to the original permissions. The permission seeks to change the use from mineral water bottling plant and associated stores/offices to a 'light industrial use'.

5.2.19. The applicant was requested by the Commission to submit detailed information on how the proposed development and retention elements constituted 'light industrial use' as defined in the Planning and Development Regulations 2001, as amended.

5.2.20. In their response, the applicant state that their operations fall under four key areas which are conducted within enclosed buildings and provides a number of reasons why the use is considered to comply with a 'light industrial use'. I refer back to Section 2 of this report which sets out a detailed description of the operations taking place.

5.2.21. Under Item 3, the applicant was requested to include relevant drawings including HVAC equipment, duct work, piping etc with detailed dimensions and explanatory legend/annotation. This information was not provided by the applicant, instead a summary note was provided, as described in Section 2 of this report.

5.2.22. Planning and Development Regulations 2001, as amended

5.2.23. For the purposes of defining a 'light industrial use', I refer to the definitions provided in the Planning and Development Regulations 2001, as amended, which relate to a 'light industrial building' and 'industrial process' as follows:

5.2.24. A '*light industrial building*' means an industrial building in which the processes carried on or the plant or machinery installed are such as could be carried on or installed in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.'

5.2.25. "industrial process" means any process which is carried on in the course of trade or business, other than agriculture, and which is-

(a) for or incidental to the making of any article or part of an article, or for or incidental to the altering, repairing, ornamenting, finishing, cleaning, washing, packing, canning, adapting for sale, breaking up or demolition of any article, including the getting, dressing or treatment of minerals,

and for the purposes of this paragraph, "article" includes-

(i) a vehicle, aircraft, ship or vessel, or

(ii) a sound recording, film, broadcast, cable programme, publication and computer program or other original database;

5.2.26. Based on the definition of a 'light industrial building', the likely outputs relate to noise, air emissions, fumes, dirt and odours.

5.2.27. The issue of noise has been ventilated by the Planning Authority at FI and CFI stages.

5.2.28. In response to Item No. 12 of the request for Further Information, a Noise Impact Assessment was submitted with six noise sensitive receptors identified. However, there were deficiencies in this assessment - the noise surveys only appeared to provide noise survey results for three of these noise sensitive receptors; the planning authority also queried whether the surveys coincided with peak noise intensity operations/activities on site. The revised noise assessment was also requested to include noise mitigation/suppression measures to reduce potential noise impacts in the event that noise from operations on site exceed maximum levels anticipated.

5.2.29. A Clarification of Further Information (CFI) was made by the applicant which clarified that when the noise survey was carried out, it was representative of typical peak operational conditions. Predicted operational noise levels were submitted for each of the six sensitive receptors which are indicated as being below recommended levels set out in the guidance documents. The Planning Authority recommended a noise condition to ensure that noise at the sensitive receptors does not exceed the limits set out in response.

5.2.30. Conditions 19 and 20 were included in the grant of permission to address construction and operational noise respectively.

5.2.31. In terms of air emissions, fumes, dirt and odours, the applicant has provided a response in Section 2 of this report. Based on the information submitted, and my own observations on-site, I would conclude that the facility will not be detrimental to the residential amenities of the area with regard to noise, air emissions, fumes, dirt and odours. This opinion is based on the applicant complying with the proposed emission limit values and with all relevant conditions imposed by the PA.

5.2.32. Notwithstanding this conclusion on emissions, I would consider that the location of the proposed development within this rural area is not supported by the policies and objectives of the CDP. In this regard, the principle of the development has not been established and I consider this to be a substantive reason for refusal.

5.3. Water and Wastewater Disposal

Water Supply

5.3.1. The applicant has submitted a site layout plan clarifying the location of an existing bored well which is the source of water supply for the development.

Wastewater disposal

5.3.2. As set out under FI Item 4, the applicant was requested to submit an updated and fully completed Site Characterisation Form, including subsurface percolation testing and surface percolation testing, clearly demonstrating the suitability of the proposed onsite wastewater treatment system and percolation area.

5.3.3. In response, the applicant states that a fully completed Site Characterisation Form, including surface and subsurface percolation test results was submitted as part of the original application. The applicant has resubmitted this report which was prepared by Coyle Environmental dated 21/11/23. I also note that supplementary information was submitted to the PA on the design of the wastewater treatment and disposal system by way of further information.

I note that no updates have been made to the original Site Characterisation Form. Section 3.3 of the form indicates that the subsurface percolation test failed the pre-soak stage and no surface percolation test results were carried out. The site characterisation trial holes encountered the water table at 1.1m and could not

complete any percolation tests. It is therefore proposed to provide tertiary treatment, disposing to a new constructed and raised percolation area at the southern end of the site. This is to be constructed to achieve adequate separation from ground water. I understand that the PA did not object to these proposals and that no contrary evidence has been submitted to indicate that these proposals are not adequate. This is also noted to be an upgrade to the existing treatment system on the site. Subject to compliance with the EPA CoP this may be considered to be acceptable and no impacts on the underlying aquifer are therefore anticipated.

- 5.3.4. I note that a number of previous planning applications on this site included reasons for refusal in relation to ground conditions – in terms of Unit 1, under Ref. 03/846 while the industrial storage unit was granted, there were major issues raised in relation to the adequacy of the sewage treatment plant and the proposed level of water extraction. Under Ref. 05/1436, which sought to retain the building and proprietary treatment unit as constructed, the Planning Authority refused retention as they were not satisfied that the soils on the site were suitable for the proposed wastewater treatment system;
- 5.3.5. On an adjoining site to the north of the appeal site, under Ref. 07266, permission was refused for a warehouse, with one of the refusal reasons relating to the suitability of the soils for sewage treatment. It is considered that the proposed wastewater treatment system addresses the previous issues on this site.

5.4. Residential Amenity

- 5.4.1. I acknowledge the concerns raised by the appellant with regard to operational noise from the industrial units. I have addressed noise impacts under Section 5.2 of my report. The Planning Authority requested a noise impact assessment at FI stage, which was further revised at CFI stage. Subject to compliance with relevant conditions in terms of operating hours, noise emission limits as set out in the documentation submitted to the planning authority and noise monitoring to confirm compliance, I do not consider that noise would be a significant issue for the development.
- 5.4.2. In terms of visual impact, it is the addition to the original permitted development on the site that is of concern, in terms of scale and height.

5.4.3. The appeal site is located within Landscape Character Area 32 Roscommon Town and Hinterland and has been assigned a High Value on Figure 8 of the Landscape Values Map of the CDP. A key recommendation for this area is that development should only be permitted where it is of the highest quality of design and will not significantly adversely impact on the surrounding landscape character. The applicant was requested at FI stage to submit a detailed landscaping plan in order to soften the visual impacts of the development at this rural location.

5.4.4. While the proposed landscaping plan is to be welcomed, I note the lack of any meaningful landscaping along the northern boundary of the site, which impacts on the appellant's property. If the Commission intend to grant permission for the application, I recommend a condition to augment the extent of landscaping along this boundary.

5.5. **Other Matters**

5.5.1. **Transportation Issues** - The appellant has raised concerns regarding an increase in traffic based on the level of floor space sought; and concerns around traffic safety when exiting the site. The grounds of appeal relating to traffic safety included:

- Traffic hazard – in an attempt to manage risks – the removal of the entirety of the hedge and creation of an urban edge.
- No reference to what form the delivery vehicles would take,
- The ongoing day to day operations pose serious traffic hazards as it stands and the proposal will exacerbate these risks. The road network is not suitable.

5.5.2. The Roads Section of RCC sought FI in relation to sightlines and the need to demonstrate compliance with Figure 12.4 of the CDP; a detailed breakdown of the nature of activity proposed at this location: the anticipated vehicular traffic movements, including HGV and car movements; details of staff numbers and the anticipated number of visitors, deliveries etc. on a daily/weekly basis; proposed days and hours of operation on site.

5.5.3. The applicant provided this information as part of the FI response – firstly, in relation to sightlines the applicant submitted an updated Site Layout plan with sightlines of 90m shown, and a new boundary wall proposed over the full width of the site frontage, set back 4m from the existing road edge. In order to soften the appearance of the front boundary, the landscaping plan proposes new native boundary hedging along this

boundary and trees on a 1m high berm. I consider this to be acceptable. The Roads Section raised no further issues in terms of sightlines, and Condition 6 of the permission was inserted to ensure that the vehicular access would be constructed in accordance with the site layout plan submitted on the 5th August 2024 along with the indicated achievable sightlines shown.

- 5.5.4. The number of staff numbers are anticipated to be 30; an average of 2-3 visitors per week is anticipated; number of deliveries is expected to be 2 per week, with 3 to 5 dispatches from the site. I would consider the number of vehicular movements to be relatively low.
- 5.5.5. In conclusion, having regard to the relatively low vehicular movements, the traffic volumes to the facility would not be considered significant and the road network is capable of accommodating this capacity. The sightlines are also achievable. I note that the Planning Authority did not raise any objections to the development on these grounds. In the event of a grant of permission being considered, a Traffic Management Plan could be conditioned.
- 5.5.6. Overall, from a residential amenity perspective, taking the noise, visual impact and traffic considerations into account and the various conditions attached to the permission, I would conclude that there are not likely to be significant impacts on residential amenity or in terms of road safety as a result of the development.
- 5.5.7. The appellant refers to the removal of soil from the site. This issue appears to be currently under investigation by the Environment Section of Roscommon County Council and is considered to be outside the scope of the current appeal. The appellant raised issues around drainage on the site and potential impacts off-site, including water pooling, potential damage to the aquifer and deterioration in the quality of his well water. The applicant submitted surface water management proposals in the form of a drainage layout plan and drainage calculations. The proposal included a drainage network, proposed attenuation (with a maximum storage required of 873 cubic metres), SuDs features (tree pits) and permeable paving. Discharge will be via a petrol interceptor to an existing manhole to the south of the site I consider that the proposed surface water proposals are acceptable and subject to attenuation to greenfield rates, it is not considered that this would give rise to offsite impacts.

6.0 AA Screening

I have considered the proposed development in light of the requirements of S.177U of the Planning and Development Act 2000, as amended. The subject site is not located within or adjacent to any European Site. The subject site is located within a rural area with a number of one-off rural dwellings within the immediate vicinity.

The nearest designated sites are Corbo Bog SAC (Site Code 002349) c.3 km to the east of the site and Lough Ree SAC (Site Code 000440), c. 4 km to the south of the site.

Permission and retention permission is sought for 2 no. industrial units as constructed; new machinery storage shed; new proprietary treatment system and polishing filter; decommission of existing septic tank and treatment system; removal of entrance and upgrade of existing entrance; all ancillary site works.

Surface water is proposed to be disposed of by attenuation and SuDS features such as tree pits.

- 6.1.1. No further nature conservation concerns were raised in the planning appeal.
- 6.1.2. Having considered the nature, scale and location of the proposed development, I am satisfied that it can be eliminated from further assessment because it could not have any effect on a European Site.

The reason for this conclusion is as follows:

- The proposed/retention works are limited in scale.
- Connection to an existing bored well.
- The distance from the nearest European site no impacts/effects are predicted in this regard.
- There are no identifiable hydrological/ecological connector pathways between the application and the SAC's.

- 6.1.3. I conclude, 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.

6.1.4. Likely significant effects are excluded and therefore Appropriate Assessment (stage 2) (under Section 177V of the Planning and Development Act 2000, as amended) is not required.

7.0 Water Framework Directive (WFD)

7.1. The surface waterbody Clooneigh _020 is located approx. 509 metres west of the site, with a Moderate water body status; The groundwater waterbody is Funshinagh (IE_SH_2091) and has an overall groundwater status of Good.

The subject site is located on unzoned land within a rural area approx. 3 km to the north-east of Roscommon town. Permission and retention permission is sought for 2 no. industrial units as constructed; new machinery storage shed; new proprietary treatment system and polishing filter; decommission of existing septic tank and treatment system; removal of entrance and upgrade of existing entrance; all ancillary site works.

Surface water is proposed to be disposed of by attenuation and SuDS features such as tree pits.

7.1.1. The appellant raised concerns with regard to water pooling, potential damage to the aquifer and deterioration in the quality of his well water. These concerns have been addressed under the sections discussing the proposed surface water drainage proposals and the proposed proprietary wastewater treatment system.

7.1.2. I have assessed the proposed development seeking permission and have considered the objectives as set out in Article 4 of the Water Framework Directive which seek to protect and, where necessary, restore surface water and ground water waterbodies in order to reach good status (meaning both good chemical and good ecological status), and to prevent deterioration. 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 surface and/or groundwater water bodies either qualitatively or quantitatively.

7.1.3. The reason for this conclusion is as follows:

- Nature of works e.g. scale and nature of the development.

- Location-distance from nearest water bodies and/or lack of hydrological connections.

7.1.4. I conclude that on the basis of objective information, that the proposed development will not result in a risk of deterioration on any water body (rivers, lakes, groundwaters, transitional and coastal) either qualitatively or quantitatively or on a temporary or permanent basis or otherwise jeopardise any water body in reaching its WFD objectives and consequently can be excluded from further assessment.

8.0 **Recommendation**

Having considered the contents of the application, the decision of the planning authority, the provisions of the Development Plan, the grounds of the appeal and the responses thereto, my site inspection and my assessment of the planning issues, I recommend that permission be Refused for the reasons set out hereunder.

9.0 **Reasons and Considerations**

1. The policy position for the location of industrial/enterprise uses as set out in the Roscommon County Development Plan 2022-2028 is to concentrate such uses on zoned and serviced sites within the county in the first instance. This policy is considered to be reasonable. Having regard to the intensification of use that has occurred on the site, to grant retention permission for the development and permission for the further expansion thereof would be contrary to the provisions of the development plan including Policy Objectives ED6.9 and ED6.10, which seek to accommodate proposals for small scale enterprise in rural areas, subject to relevant planning considerations including demonstrating that the nature of the activity is appropriate to the rural area and evidence that it cannot be accommodated on zoned land in the towns within the county. The proposed development and development seeking retention would, therefore, set an undesirable precedent for similar type development, and would, therefore, be contrary to the proper planning and sustainable development of the area.

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.

Yolande Mc Mahon
Planning Inspector

15th December 2025

Form 1 - EIA Pre-Screening

Case Reference	ACP 321335-24
Proposed Development Summary	Permission and retention permission is sought for 2 no. industrial units as constructed; new machinery storage shed; new proprietary treatment system and polishing filter; decommission of existing septic tank and treatment system; removal of entrance and upgrade of existing entrance; all ancillary site works.
Development Address	Roxborough, Co Roscommon
	In all cases check box /or leave blank
<p>1. Does the proposed development come within the definition of a 'project' for the purposes of EIA?</p> <p>(For the purposes of the Directive, "Project" means:</p> <ul style="list-style-type: none"> - The execution of construction works or of other installations or schemes, - Other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources) 	<input checked="" type="checkbox"/> Yes, it is a 'Project'. Proceed to Q2. <input type="checkbox"/> No, No further action required.
<p>2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?</p> <p><input type="checkbox"/> Yes, it is a Class specified in Part 1.</p> <p>EIA is mandatory. No Screening required. EIAR to be requested. Discuss with ADP.</p>	
<input checked="" type="checkbox"/> No, it is not a Class specified in Part 1. Proceed to Q3	
<p>3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?</p>	

<input checked="" type="checkbox"/> No, the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed type of proposed road development under Article 8 of the Roads Regulations, 1994. No Screening required.	
<input type="checkbox"/> Yes, the proposed development is of a Class and meets/exceeds the threshold. EIA is Mandatory. No Screening Required	
<input type="checkbox"/> Yes, the proposed development is of a Class but is sub-threshold. Preliminary examination required. (Form 2) OR If Schedule 7A information submitted proceed to Q4. (Form 3 Required)	

4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?	
Yes <input type="checkbox"/>	
No <input checked="" type="checkbox"/>	Pre-screening determination conclusion remains as above (Q1 to Q3)

Inspector: _____ Date: _____

Form 2 - EIA Preliminary Examination

Case Reference	ACP 321335-24
Proposed Development Summary	Permission and retention permission is sought for 2 no. industrial units as constructed; new machinery storage shed; new proprietary treatment system and polishing filter; decommission of existing septic tank and treatment system; removal of entrance and upgrade of existing entrance; all ancillary site works.
Development Address	Roxborough, Co Roscommon
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).	Retention of 2 industrial units (Units 1 and 2) on site and the construction of a separate machinery storage unit. Gross floor area of works to be retained 3,178 sq. m and proposed works of 1,634 sq.m. Demolition works (57 sq. m) in the form of an existing annex to the rear of Unit 1, which can be controlled and managed through standard best practice methodology. The development would not require the use of substantial natural resources or give rise to significant risk of pollution or nuisance due to its scale. The level of waste that would be generated would not be significant in the local, regional or national context and would not require the use of substantial resources. No significant waste, emissions or pollutants would arise during the demolition, construction or operational phases. Due to the nature of the proposed/retention use, it does not pose a risk of major accident and/or disaster and would not be vulnerable to climate change. It would not present a risk to human health.
Location of development (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	The site is located on unzoned land c.3km to the north-east of Roscommon Town. The predominant land uses are one-off rural dwellings and agricultural lands. The site is located within Landscape Character Area 32 Roscommon Town and Hinterland and has been

<p>capacity of natural environment e.g. wetland, coastal zones, nature reserves, European sites, densely populated areas, landscapes, sites of historic, cultural or archaeological significance).</p>	<p>assigned a High Value as per Figure 8 of the Landscape Values Map of the CDP.</p> <p>The site is not located within or adjacent to a wetland, coastal zone, nature reserve or within a European site. No sites of historic, cultural or archaeological significance were identified.</p> <p>It is not likely to have any cumulative impacts or significant cumulative impacts with other existing or permitted projects.</p>
<p>Types and characteristics of potential impacts</p> <p>(Likely significant effects on environmental parameters, magnitude and spatial extent, nature of impact, transboundary, intensity and complexity, duration, cumulative effects and opportunities for mitigation).</p>	<p>There are no identifiable hydrological/ecological connector pathways between the application site and any SAC or SPA.</p> <p>There are no other locally sensitive environmental sensitivities in the vicinity of relevance.</p> <p>No significant impacts are predicted from proposed demolition due to the scale of the demolition to be carried out. Localised construction impacts will be temporary.</p> <p>Having regard to the nature and scale of the proposed/retention development, the size of the site and its location removed from sensitive habitats/features, the likely limited magnitude and spatial extent of effects, and the absence of significant cumulative effects, I am satisfied that there is no potential for significant effects on the environmental factors set out in Section 171A of the Planning and Development Act 2000 (as amended).</p>
<p>Conclusion</p>	
<p>Likelihood of Significant Effects</p> <p>There is no real likelihood of significant effects on the environment.</p>	<p>Conclusion in respect of EIA</p> <p>EIA is not required.</p>

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Inspector: _____ Date: _____

DP/ADP: _____ Date: _____

(only where Schedule 7A information or EIAR required)