



An
Coimisiún
Pleanála

Inspector's Report PL-500337-GY-25

Development	Construct two warehouse units and two light industrial workshops (partially completed under previously approved Planning Reference 05/275, and 07/2542) and all associated works.
Location	Garrafrauns, Quinaltagh, Dunmore, Co Galway.
Planning Authority	Galway County Council.
Planning Authority Reg. Ref.	2561371.
Applicant(s)	Robert Perry.
Type of Application	Permission.
Planning Authority Decision	Refuse Permission.
Type of Appeal	First Party Normal Planning Appeal.
Appellant(s)	Robert Perry.
Observer(s)	None.
Date of Site Inspection	5 th February 2026.

Inspector

C. Daly.

1.0 Site Location and Description

- 1.1. The subject site, of area 1.632ha, consists of a narrower area up to the public road and which consists of part stone and gravel partially constructed internal road areas and some grasslands and shrub areas and the wider area in the middle and to the rear of the site consists of an area in earth and stones and a separate grassland area which also includes some shrubs and bushes and there are some trees scattered in the rear portion of the site. The site slopes downhill modestly from front to rear.
- 1.2. Part of the front roadside boundary consists of a low stone wall on the north-west side of the wide road entrance and there is no permanent roadside boundary on the south-eastern side of the entrance where there is temporary fencing in place and further east some trees and hedgerow. There is a ditch on part of the northern boundary which links with another water-based ditch located a short distance to the north.
- 1.3. There are three substantially complete houses adjacent to the north-west of the site in what appears to be a partially completed modest sized housing estate with an internal substantially complete estate road and public lighting and footpaths. There is an area of overgrown rural land to the south-east side and to the rear the adjacent field consists of woodland. Directly opposite the site to the south-west there is a two storey rural dwelling well set back behind an agricultural grass field and to its side are large agricultural sheds.
- 1.4. The subject site is within the 50kph speed limit areas and is c.75m from the edge of the village of Garrafrauns which is centred around a crossroads c.165m to the south-west of the site.

2.0 Proposed Development

- 2.1. The proposed development, in summary, consists of the following:
 - Construction of two no. warehouse units and two no. industrial/workshop units both of which (total floor area 1,800sqm) are in the form of parallel pitched roof elements with tall central sliding doors at each end of the gable elevations which would face the road.

- Completion of existing access roads and services to serve these units (previously permitted (reg. refs. 05275 and 072542).
- Construction of effluent treatment system and percolation area.

3.0 Planning Authority Decision

3.1. Decision

Roscommon County Council decided to refuse permission for 5 no. reasons which related to:

(1) inappropriate form of development that would negatively impact on the visual aesthetic and residential amenity and public realm of the area due to its discordant layout and arrangement and would materially contravene policy objectives PM 1, PM 4, PM 6, PM 8, PM 10, and PM 11 and development management standards DM1 and DM2,

(2) endanger public safety by reason of traffic hazard and obstruction of road users and material contravention of Policy Objectives NNR 2, NNR 3, NNR 6 and NNR 7 and DM Standards 28, 34 and 67 of the Development Plan,

(3) noting ponding on the site the P.A. is not satisfied that wastewater can be treated and disposed of on the site without prejudice to public health which would be contrary to Policy Objective WW6 of the Development Plan,

(4) the surface water cannot be satisfactorily disposed of on the site which would materially contravene Objective WW7 and DM Standard 67 of the Development Plan and

(5) the serious risk to public health in the absence of consent from Uisce Éireann to connect to the public water mains would be contrary to Policy Objective WS 4 and DM Standard 36 of the Development Plan.

3.2. Planning Authority Reports

3.2.1. Planning Reports

The Planner's Report assessment noted the brownfield location within the 50km per hour speed zone. Noting this, the constructed access and internal roads and the

definition of the proposed uses in the planning regulations, it considered the principle of development to be acceptable.

It noted that the layout and staggered footprint of the units would not address the public road and the absence of boundary treatment details. It was considered that it would not assimilate appropriately or create an appropriate village entry point. The external material were also not considered appropriate. It was considered contrary to Section 3.5.8 (Design Quality for Placemaking, Regeneration and Urban Living).

It noted the large number of issues the roads department had including in relation to, inter alia, sightlines, internal road markings, pedestrian movements, internal footpaths, external roadside footpaths, articulated auto tracking movements for entry and exit, Road Safety Stage 1 / 2 audit requirement and required Traffic Impact Assessment.

Noting the subsurface and surface drainage results from the Site Characterisation Form and the observed high water table on the site, it was did not consider it would accord with the EPA Code of Practice. It noted no confirmation of connection feasibility was submitted in relation to water supply. The report noted an absence of detail as to how surface water would be treated in advance of discharging to the adjacent ditch and no SUDS measures were proposed.

Refusal of permission was recommended in relation to 5 no. reasons as previously summarised above.

3.2.2. Other Technical Reports

- Tuam Area Council Office: No report received.
- Environment Section: No report received.
- Roads and Transportation Unit: Further information required.

3.3. Prescribed Bodies

- TII: Regard should be had to relevant TII guidance.
- The Heritage Council: No report received.
- Development Applications Unit: No report received.
- An Taisce: No report received.

3.4. Third Party Observations

None.

4.0 Planning History

2461627: Application withdrawn to construct two warehouse units and two light industrial /workshop units and completion of existing roads and services.

072542: Permission granted by the P.A. to construct 2 no. semi-detached two storey houses to connect to existing services permitted under Pl. Ref. 05/275.

05275: Permission granted by the P.A. for the construction of six detached dwellinghouses, six semi-detached dwellinghouses, petrol filling station, with shop, treatment plant and percolation area, associated services and site works (gross floor space 1780sqm).

Adjacent Sites

2560037: Permission granted by the P.A. at adjacent site to the north-west to complete three dwellings granted under reg. refs. 07239 and 05275 and for new site entrance and three effluent treatment systems and revised boundaries.

18912: Permission granted by the P.A. adjacent site to the south-east for the construction of a dwelling house, domestic garage/fuel store and proprietary treatment system.

061155: Permission granted by the P.A. at adjacent site to the south-east for a store for ancillary use to existing Hyundai garage and all associated services (Gross floor area 172.8 sqm).

5.0 Policy Context

5.1. Galway County Development Plan 2022-2028 (the CDP)

Chapter 2 – Core Strategy, Settlement Strategy and Housing Strategy

I note that the village of Garrafrauns is not defined in the CDP settlement hierarchy. It is in effect an other settlement in the rural countryside. There is no defined settlement boundary and no zoning objectives.

Chapter 3 Placemaking Urban Regeneration and Urban Living

Policy Objective PM 1 Placemaking

To promote and facilitate the sustainable development of a high-quality built environment where there is a distinctive sense of place in attractive streets, spaces, and neighbourhoods that are accessible and safe places for all members of the community to meet and socialise.

Policy Objective PM 4 Sustainable Movement within Towns

It is a policy objective of the Planning Authority to encourage modal shift in our towns to more sustainable transport alternatives through mixed use development that enables local living and working which is well connected to sustainable transport infrastructure such as walking, cycling, public bus and rail transport.

Policy Objective PM 6 Health and Wellbeing

Promote the development of healthy and attractive places by ensuring:

(a) Good urban design principles are integrated into the layout and design of new development;

(b) Future development prioritises the need for people to be physically active in their daily lives and promote walking and cycling in the design of streets and public spaces

(c) New schools and workplaces are linked to walking and cycling networks

(d) The provision of open space considers different types of recreation and amenity uses with connectivity by way of safe, secure walking and cycling routes.

(e) Developments are planned for on a multi-functional basis incorporating ecosystem services, climate change measures, Green Infrastructure and key landscape features in their design.

Policy Objective PM 8 Character and Identity

Ensure the best quality of design is achieved for all new development and that design respects and enhances the specific characteristics unique features of the towns and villages throughout the County.

Policy Objective PM 10 Design Quality

To require that new buildings are of exceptional architectural quality, and are fit for their intended use or function, durable in terms of design and construction, respectful of setting and the environment and to require that the overall development is of high quality, with a well-considered public realm.

Policy Objective PM 11 Details of Materials

To ensure that the appearance of buildings, in terms of details and materials (texture, colour, patterns and durability), is of a high standard with enduring quality and has a positive impact on the visual quality of the area.

Chapter 4 – Rural Living and Development

4.13 Commercial Developments in Rural Areas

....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....

Policy Objective CD 1 CD 1 Rural Enterprises

Consider and support the establishment of small scale rural orientated enterprises in unserviced rural areas outside of town or village settings which can be accommodated in existing farm buildings or can be established on a brownfield site, subject to satisfying the following criteria:

- (a) Compatibility and general suitability to an unserviced rural area (primary consideration will be given to agriculture, renewable and marine resources, forestry, tourism, recreation or food production related enterprise activities and services);*
- (b) Scale of development (assimilate appropriately into a rural setting);*
- (c) Nature of development (raw materials sourced locally);*

(d) Consideration of social and environmental impacts (enterprise must not have a significant adverse impact on the environment or rural amenity);

(e) The enterprise must not constitute a road safety hazard or have a major adverse impact on the road network, road capacity and traffic levels;

(f) Residential amenity (enterprise must not have a significant adverse impact on residential amenity).

Chapter 5 – Economic Development, Enterprise and Retail Development

Section 5.5.7 Zoned Employment Land

...it is considered that there is an adequate supply of land zoned for employment but the location of these zonings will be kept under review.

Chapter 6 – Transport and Movement

Policy Objective NNR 2 Safeguard Regional and Local Roads

To safeguard the carrying capacity and safety of the County's regional and local road network.

Policy Objective NNR 3 Design Manual for Urban Roads and Streets

Implement the national design standards outlined in the Design Manual for Urban Roads and Streets (DMURS 2019) for urban streets and roads within the 50/60 kph zone.

Policy Objective NNR 6 Transport and Traffic Assessments and Road Safety Audits

To require the preparation of Transport and Traffic Assessments and Road Safety Audits for new developments in accordance with the requirements set out in the TII Traffic and Transport Assessment Guidelines.

Policy Objective NNR 7 Mobility Management Plans

To require mobility management plans to be submitted with applications for trip intensive developments.

Chapter 7 Infrastructure, Utilities and Environmental Protection

Policy Objective WW 6 Private Wastewater Treatment Plants

Ensure that private wastewater treatment plants, where permitted, are operated in compliance with Environmental Protection Agency (EPA) Code of Practice for Domestic Waste Water Treatment System 2021 (Population Equivalent ≤10).

Policy Objective WW 7 Sustainable Drainage Systems

To require the use of Sustainable Drainage Systems to minimise and limit the extent of hard surfacing and paving and require the use of SuDS measures be incorporated in all new development (including extensions to existing developments). All development proposals shall be accompanied by a comprehensive SuDS assessment including run-off quantity, run off quality and impacts on habitat and water quality.

Policy Objective WS 4 Requirement to Liaise with Irish Water – Water Supply

Ensure that new developments are adequately serviced with a suitable quantity and quality of drinking water supply and require that all new developments intending to connect to a public water supply liaise with Irish Water with regard to the water (and wastewater) infrastructure required.

Chapter 15 - Development Management Standards

DM Standard 1: Qualitative Assessment-Design Quality, Guidelines and Statements

The main requirement for a qualitative assessment regarding development in towns and villages shall have regard to the following:

Placemaking

The placemaking process will be delivered through the universal application of best practice urban design principles to all new developments. This requires all development proposals to contribute to well serviced integrated residential, commercial and employment development that is accessible to a range of community facilities, public transport infrastructure and other local services....

Built Form

This section sets out principles and a guide to approach such design.

DM Standard 2: Multiple Housing Schemes (Urban Areas)

Town and Village Centre Infill Sites

...Infill proposals should consider other site circumstances relating to:

- *The existing pattern of development, density, plot size, building height;*
- *Impact on residential amenity, daylight, loss of privacy, overlooking;*
- *The provision of private open space for existing and proposed properties;*
- *Car parking standards;*
- *Building orientation.*

A degree of flexibility may apply to infill sites who cannot facilitate certain standards, particularly if it contributes to sustainable compact development...

Traffic Safety and Management The quality of the layout of developments and the manner in which it addresses traffic management and safety is vital to the creation of successful walkable neighbourhoods. Access and movement planning and design should seek to minimise conflict between pedestrians/cyclists and vehicular traffic wherever possible. Creative approaches to the design of multifunctional streets and roads which reduce the speed and perceived dominance of vehicles is encouraged, such as the arrangement of on street parking, street trees, narrowing of carriageways at pedestrian crossings etc. Streets and road design should not impede the ease of pedestrians/cyclists movement to key destinations within or beyond the development. These standards must be complied with in accordance with the Policy Objectives of Chapter 6 Transport and Movement....

DM Standard 17: Rural Enterprise

This refers to rural enterprises and resource development in rural areas.

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

This sections sets out sightline requirements and compliance requirements in relation to national standards including DMURS.

...Exit Visibility Check Visibility splays shall be measured a minimum distance of 2.4m from the edge of the carriageway ('x' distance) or as determined by Galway County Council. In limited instances this may be reduced to 2.4m and to 2.0m in difficult circumstances on urban roads. Site visibility requirements shall be provided within the development boundary of the site or on lands in the control of the applicant or lands in public ownership....

Table 15.3 sets out sight distances required for access onto National, Regional and Local Roads including 70m requirement where the design speed is 50kph.

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. This shall be guided by the following:

a) Traffic and Transport Assessment (TTA), Road Safety Audit (RSA) & Road Safety Impact Assessments (RSIA) Require all planning applications for significant development proposals to be accompanied by a TTA, RSA and RSIA to be carried out by a suitably competent consultant, which are assessed in association with their cumulative impact with neighbouring developments on the road network....

DM Standard 34: Mobility Management Plans

All new developments and proposed extensions to existing developments should give consideration to limiting traffic generation as far as possible. Where medium to large scale residential, commercial, mixed use, business/enterprise or industrial developments are proposed a Mobility Management Plan will be required and should incorporate proposals for use of public transport, cycling, walking, car sharing, car pooling etc. as appropriate. Mobility Management Plans should include achievable measures to reduce dependency on private car use for daily commutes and incorporate where possible....

DM Standard 36: Public Water Supply and Wastewater Collection

All new developments will be required to utilise and connect to the public water and wastewater network, where practicable. Applicants who need to get a new or

modified connection to public water supply or wastewater collection infrastructure must liaise with Irish Water. In the first instance, the applicant should make a pre-connection enquiry to Irish Water in order to establish the feasibility of a connection in advance of seeking planning permission. Irish Water is not responsible for the management or disposal of storm water or ground waters.

DM Standard 67: Sustainable Drainage Systems' (SuDS)

All new developments (including amendments / extensions to existing developments) will be required to incorporate 'Sustainable Urban Drainage Systems' (SuDS) as part of the development/design proposals. SuDS are effective technologies, which aim to reduce flood risk, improve water quality and enhance biodiversity and amenity. The systems should aim to mimic the natural drainage of the application site to minimise the effect of a development on flooding and pollution of existing waterways. SuDS include devices such as swales, permeable pavements, filter drains, storage ponds, constructed wetlands, soakways and green roofs. In some exceptional cases, and at the discretion of the Council, where it is demonstrated that SuDS devices are not feasible, approval may be given to install underground attenuation tanks or enlarged pipes in conjunction with other devices to achieve the required water quality. Such alternative measures will only be considered as a last resort.

Proposals for surface water attenuation systems should include maintenance proposals and procedures. Development proposals will be required to be accompanied by a comprehensive SuDS assessment that addresses run-off rate, run-off quality and its impact on the existing habitat and water quality. This approach using SuDS offers a total solution to rainwater management and is applicable in both urban and rural situations. Current best practice guidance on SuDS is available from the Guidance Documents produced by the Greater Dublin Strategic Drainage Study (GSDSDS).

5.2. Natural Heritage Designations

In relation to designated sites, the subject site is located:

- c.1.7km east of Lough Corrib SAC (site code 000297).
- c.9.1km north-east of Altore Lake PNHA (site code 000224).
- c.9.6km north-west of Slieve Bog NHA (site code 000247).

- c.9.6km north-west of Drumbulcaun Bog PNHA (site code 000263).
- c.10.5km south-west of Williamstown Turloughs SAC (site code 002296).

6.0 The Appeal

6.1. Grounds of Appeal

The grounds of the first party appeal on behalf of Robert Perry can be summarised as follows:

Refusal Reason No. 1

- The edge of village site is the only semi-developed land available to build a unit of suitable size for the applicant's business.
- The houses between the site and the village have front boundary walls built to the edge of the road and the applicant should not be required to build public infrastructure on lanes outside of his own.
- The single storey units are set back by 40m and 90m from the public road and these are a common building type in many towns and villages.
- The site opposite has a large industrial type building on it which is in use.
- This will bring the abandoned land back into use enhancing the entry into the village and will create employment.

Refusal Reason No. 2

- The access to the site is already established within the 50kph zone approaching the village and has been constructed in a splayed form.
- Sightlines are available from both sides at the required 2.4m setback.
- The roads and services are properly constructed and will be continued to link the proposed sites.
- The foul sewer is to connect the proposed treatment system.
- The storm sewer will connect to an existing local drain via an attenuation unit and three chamber petrol interceptor.

- The tracking details outline the site layout design to separate staff/visitor traffic from delivery vehicles.
- If the original development had went ahead it would be serving a filling station and 12 houses from the safe access.
- The link to the village is limited as the public road has been widened to the edge of the front walls of the two adjoining houses.

Refusal Reason No. 3

- The loading on the wastewater treatment system will be low as it will have basic cooking and toilet facilities for staff and visitors and it will not have industrial washings.
- The WWT system is for 20pe allowing for any further expansion.
- The trial holes were dug in the same area as the previous permission and the photos show the water table with the EPA report outlining the results.

Refusal Reason No. 4

- The existing surface water network will be extended to take the roof and surface water from each unit via gullies and pipework as shown and will discharge to an existing drain via an attenuation unit and three chamber petrol interceptor thereby reducing flow into the drain and collecting soil.

Refusal Reason No. 5

- There is already a connection to the public main and a pipe laid into the site which will be extended to serve the proposed units and Uisce Éireann have issued a connection validation for the proposed units.
- In summary, there has been a failure to look at the existing situation and consider it appropriately and the site will otherwise remain vacant.

7.0 **Assessment**

- 7.1. Having examined the application details and all other documentation on file, including all of the submissions received in relation to the appeal, the report/s of the local authority, and having inspected the site, and having regard to the relevant

local/regional/national policies and guidance, I consider that the substantive issues in this appeal to be considered are as follows:

- Principle of Development
- Design and Layout.
- Roads Issues
- Wastewater Treatment
- Surface Water Drainage
- Water Supply

7.2. Principle of Development

- 7.2.1. I note that the subject is located outside of Garrafrauns village. This village is not zoned for development, has no settlement boundary and under the CDP is effectively considered an other settlement in the rural countryside.
- 7.2.2. In relation to the proposed light industrial buildings/land use for the site, I note that in the first instance the CDP seeks for commercial developments to be directed to settlements with available services and where lands have been identified for employment uses. It provides for instances where commercial developments can be located in a rural area due to location specific, resource based development or a development of regional or national importance. I note that none of these criteria apply in the case of the proposed light industrial land use and that no lands in or around Garrafrauns, including the subject site, have been identified for the proposed light industrial use.
- 7.2.3. I note that Policy Objective CD 1 (Rural Enterprises) allows for small scale rural orientated enterprises in unserviced rural areas outside of a village setting on a brownfield site subject to 6 criteria. However, based on the information submitted I do not consider the proposed development to be a small scale *rural orientated enterprise*. I note no information has been submitted to significantly clarify the nature of the light industrial land use proposed, whether it is associated with urban or rural activity, for example.
- 7.2.4. In relation to the criteria under Policy Objective CD 1, I note the following:

Criteria (a) Compatibility and general suitability to an unserviced rural area (primary consideration will be given to agriculture, renewable and marine resources, forestry, tourism, recreation or food production related enterprise activities and services);

Noting that no connection to the rural area has been put forward, I do not consider the proposed light industrial buildings compatible with the rural area given what would be a significant scale in the receiving landscape and the absence of any association with the rural area to balance this.

(b) Scale of development (assimilate appropriately into a rural setting);

I note that by reference to the scale of development in the vicinity, a small number of two storey dwellings on either side of the site and otherwise rural lands, the scale of development (i.e. two c.900sqm buildings with ridge heights just over 8.5m in an industrial form) would appear excessive and out of character in this context and would have a significant negative impact on visual amenity.

(c) Nature of development (raw materials sourced locally);

There is no evidence that any raw materials would be used or sourced locally.

(d) Consideration of social and environmental impacts (enterprise must not have a significant adverse impact on the environment or rural amenity);

I have identified no significant social and environmental impacts associated with the development other than in relation to rural (visual) amenity.

(e) The enterprise must not constitute a road safety hazard or have a major adverse impact on the road network, road capacity and traffic levels;

Per my assessment below, I cannot rule out significant impacts on the public road network.

(f) Residential amenity (enterprise must not have a significant adverse impact on residential amenity).

7.2.5. I note no significant adverse impacts on residential amenity in the vicinity.

7.2.6. Based on the above where a number of the criteria have not been met, I do not consider there to be a CDP policy basis under Policy Objective CD 1 for the proposed land use on the subject site. I do not consider that the previous permission

granted on this site provides sufficient justification for the development proposed in this instance.

- 7.2.7. I therefore do not consider the principle of development to be acceptable in this case. I note this would be a new issue and the Commission may wish to seek the views of the parties. Given this and the other reasons for refusal recommended below, I do not propose to add the principle of development as a refusal reason.

7.3. Design and Layout

- 7.3.1. I note that the appellant has noted the site condition and context and the setbacks of the buildings from the public road in addition to asserting that the site consists of the only semi-developed land suitable for the proposed development. I note building no. 1, made up of two units, would be set back c.25m from the adjacent partially built housing estate and that it would be c.62m from the nearest dwelling therein. I note that building no. 2, including two units, would be c.35m back from the public road.
- 7.3.2. I note that both buildings would face the public road and would be well set back from same. For a light industrial development of this type, I consider the site layout with good setbacks from the public road and adjacent property, while seeking to address the public road, appropriate and to broadly align with urban design principles. In my opinion, in a location beside the urban edge context in relation to the adjacent rural village, I consider that such an approach would take account of the urban place making principles and policies of the CDP. Therefore, I do not consider that the design, form and layout of the buildings would materially contravene placemaking policies PM 1, PM 4, PM 6, PM 8, PM 10, and PM 11 as well as development management standards DM 1 and DM 2 of the CDP.
- 7.3.3. However while noting the above, while the design of the proposed buildings may be suited to an urban context, in a rural context I note that, due to the significant scale of the buildings and their industrial appearance in what is a predominantly rural landscape with some two storey dwellings in the vicinity, the visual impact would be excessive and out of place for the rural setting and would fail to adequately respect the rural setting contrary to Policy Objective PM 10 of the CDP and would fail to have a positive impact on the visual quality of the area contrary to Policy Objective PM 11 of the CDP. I note this having regard to the limited landscaping proposed in the front and mid areas of the site.

7.3.4. I consider the design would be contrary to Policy Objective CD 1 where only small scale rural enterprises are provided for in certain circumstances which have not been met as noted in Section 7.2 above. Noting that the visual aesthetic of the cited in refusal reason no. 1 of the P.A. albeit in relation place making concerns, I do not consider this to be a new issue and I recommend that permission be refused in relation to this matter.

7.3.5. I note issues below in relation to the internal road layout and in relation to the way the scheme would link with the public road, particularly in relation to compliance with DMURS. I do not consider that the above cited policies and standards of the CDP relating to place making and urban design are so specific that a material contravention in relation to road and access layout and public realm can reasonably be cited. Therefore, I recommend that refusal reason no. 1 not be upheld.

7.4. Roads Issues

7.4.1. I note the appellant has raised issues in relation to the refusal reason no. 2 of the P.A. including, inter alia, stating that the site access is established with sightlines available, that the internal roads and services are properly constructed, tracking details showing separate staff/visitor traffic from deliveries and that the original permitted development would have served a greater quantum of development.

7.4.2. The P.A. noted the absence of details in relation to the geometric parameters for the access road, road gradients and specifications. The Council's Transportation section noted the absence of a Traffic and Transport Assessment (TTA) and Stage 1 / 2 Road Safety Audit (RSA). Per DM Standard 33(a), I note that these reports are required for significant developments. I note the proposed total floor area at 1,800sqm would be less than the normal TII guidance threshold of 5,000sqm for a TTA.

7.4.3. I nevertheless note the absence of a TTA in relation to the carrying capacity of the adjacent R328. While I note that the development is not considered significant in terms of TII guidance, I note the absence of any detail regarding the nature of the proposed use such that it is difficult to determine likely traffic volumes or significance of effects. In this context, I therefore cannot rule out that the carrying capacity of the R328 would be materially impacted. Therefore, I consider this to be materially contrary to Policy Objective NNR 2 of the CDP.

- 7.4.4. I note that new road layouts are required to be designed in accordance with DMURS per Policy Objective NNR 3 and DM Standard 28 and this has not been demonstrated in the application documentation including in relation to the footpath area shown to be provided to the front of the site. I consider that this would materially contravene Policy Objective NNR 3 and DM Standard 28 given the requirement to implement DMURS is specific. I do not consider that a material contravention of Policy Objectives NNR 6 in relation to the absence of a TTA and RSA arises given the specific reference to the TII threshold in this policy objective.
- 7.4.5. In relation to Policy Objective NNR 7 and DM Standard 34 and there requirement for an MMP for trip intensive development and for medium to large scale industrial developments, I note the absence of any detail regarding the nature of the proposed use such that it is difficult to determine likely trip numbers to and from the site, for example in relation to the number of staff on the site. proposed. In this context, I consider that the development would materially contravene these policies and objectives of the CDP.
- 7.4.6. In relation to DM Standard 28, I note that sightlines up to 70m would be available to the south-east and greater to the north-west from a 2.4m setback within a 50kph speed zone. I note the tracking drawings for the lorries entering the site such that I have no significant concerns in relation to the site access. I consider that this would accord with DM Standard 28 such that I consider that no material contravention thereof arises.

7.5. **Wastewater Treatment**

- 7.5.1. I note that the P.A. noted issues with evidence of water ponding on the site such that it was not satisfied that the waste would be satisfactorily treated and disposed of on the site contrary to Policy Objective WW6 of the CDP where such systems are required to accord with the EPA Code of Practice for Domestic Wastewater Treatment Systems (P.E. <10).
- 7.5.2. I note the submitted Site Characterisation Form cites 4 staff on site which would be consistent with a P.E. ≤10 notwithstanding that the appeal references a P.E. of 20. The form outlines that the aquifer is locally important with a moderate vulnerability rating. It notes the bedrock type is lower carboniferous limestone. The trial hole

depth is noted to be 2m with water ingress at 1.85m (also noted elsewhere at 1.9m). The soil type is noted as peaty above silty clay. The response category is noted to be R2(1). Given the depth at which water was encountered, it noted a requirement that percolation pipes be kept at 1.2m above the recorded groundwater level.

However, I note the trial hole pictures indicate permanent saturation higher in the soil profile up as high as 500mm and this is further supported in the trial hole log where 'grey' colouration is recorded up to 500mm BGL. This would then mean the percolation pipes would potentially be placed submerged in the saturated material.

7.5.3. The subsurface percolation value was noted to be -6,062 and the surface percolation value was noted to be -8,505 based on the average of the three tests in each case, both invalid results. There was significant variation between the results for the three test holes. Despite this the report then quotes results of 18.61 for surface percolation and 17.22 for sub-surface percolation which were single tests and which were contradicted by the other tests. It then recommended a secondary treatment system and polishing filter. I note the percolation results are significantly outside the ranges between 3 and 90 per Table 6.4 of the EPA Code of Practice for Domestic Waste Water Treatment System 2021 (Population Equivalent ≤ 10), such that no type of treatment system is considered suitable.

7.5.4. The Site Characterisation Form states that there are drainage ditches to the north-east and I note the separation distance would be over 25m. Per the EPA Code of Practice, I note that the minimum separation distances per Table 6.2 would be met.

7.5.5. I note that where the groundwater protection response is R2(1) then polishing filters following secondary systems and infiltration areas are considered appropriate per Table 6.3 of the EPA Code and the minimum depth of unsaturated subsoil should be 0.9m as would be provided in this case according to the form. To attain the vertical separation of 900mm given the saturation referenced above this would require a trench invert at least 400mm above existing ground level which is not being proposed. However, I note that the P.A. noted that water ponding was observed on their site inspection. This is also an indicator of poor drainage on the site. The trial hole photos show grey discolouration of the soil which suggests saturated soil throughout the year and a high water table. There would be a requirement for a raised bed of minimum 0.4m above ground based on observed saturation to at least 500mm BGL and noting the invalid unclear percolation values, I consider that these

observations and results indicate poor drainage conditions on the site. This, in my view, indicates that the results and site conditions show that the wastewater treatment system and percolation area would fail to safely attenuate and dispose of the wastewater generated on the site.

- 7.5.6. Based on the above, I consider that P.A. refusal reason no. 3 should be upheld given that the applicant has failed to demonstrate that the proposed wastewater treatment system would accord with the EPA Code of Practice, 2021 in relation to the returned percolation values, the presence of poor drainage indicators and given the observed water ponding on the site. This would be prejudicial to public health and contrary to Policy Objective WW6 of the Galway County Development Plan 2022 – 2028.

7.6. Surface Water Drainage

- 7.6.1. I note that refusal reason no. 2 cited a material contravention of the CDP in relation to DM Standard 67 and its SUDS requirements. I note an absence of nature based drainage proposals in the application. The appeal states that the existing surface water drainage network would be extended and that drainage would be via an attenuation unit and three chamber petrol interceptor inside part of the northern site boundary. It is not clear from the plans where the areas of hardstanding would begin and end. Therefore, it is not possible to determine the area of the run-off areas outside of the building areas (1,800sqm). I note the attenuation tank would have a capacity of c. 280 cubic metres but it has not been demonstrated that this would be adequate for the buildings and hard surface areas on the site.
- 7.6.2. Given the lack of information in relation to areas of hardstanding (run-off areas), the minimisation of such areas and regarding the incorporation of nature based surface water drainage solutions such as such as swales, permeable pavements, filter drains, storage ponds, constructed wetlands, soakways and green roofs and in relation to the type of ground surfaces proposed to deal with the drainage requirement from the building roofs and hardstanding areas on the site, I consider that Policy Objective WW7 and DM Standard 67 would not be met in this case.
- 7.6.3. I note a failure to demonstrate that the areas of hardstanding on the site would be minimised. I do not consider this would be a material contravention of DM Standard 67 as this policy allows for some flexibility and is not so specific as to mandatorily require nature based solutions with attenuation tanks allowed for in certain cases for

example. However, I consider Policy Objective WW7 to be sufficiently specific that in my opinion this would be materially contravened. I recommend that permission be refused in relation to this issue.

7.7. Water Supply

- 7.7.1. I note the appellant has noted there is already a connection to the public mains with a pipe laid into the site which would be extended to serve the buildings. I note that this connection is existing such that I consider there to be no requirement for a pre-connection agreement from Uisce Éireann. I note that this would be consistent with Policy Objective WS 4 and DM Standard 36 of the CDP. Accordingly, I recommend that P.A. refusal reason no. 5 not be upheld in relation to this matter.

8.0 EIA Screening

- 8.1. The proposed development has been subject to preliminary examination for environmental impact assessment (refer to Form 1 and Form 2 in Appendices of this report). Having regard to the characteristics and location of the proposed development and the types and characteristics of the 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.

9.0 AA Screening

- 9.1. Significant effects cannot be excluded In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening (See assessment in Appendix 3), I conclude that it is not possible to exclude that the proposed development alone will give rise to significant effects on the Lough Corrib SAC European Site in view of the site conservation objectives. Appropriate Assessment is required. This determination is based on:

- The potential pathway to the SAC via drains adjacent to the north of the site which lead to the watercourse to the west which flows to the SAC.

- The failure to demonstrate that wastewater would be treated on the site in accordance with the EPA Code of Practice for Domestic Wastewater Treatment Systems (P.E. <10) (2021) and that there is adequate provision for the attenuation and disposal of surface water on the site.
- In the absence of details regarding the type of activities that would take place on the site, the potential for the emission of pollutants at construction and operational stages to drains and onwards via the watercourse to the west to the SAC.

9.2. In my opinion, this would merit a refusal of permission and would be a new issue which the Commission may wish to seek the views of the parties on. Given this and the other recommended reasons for refusal I do not propose to add it as a recommended reason for refusal.

10.0 Water Framework Directive

10.1. I note designated waterbodies must be improved to at least good ecological status per the requirements of the Water Framework Directive. I have carried out a screening assessment in Appendix 4 in relation to impacts related to the requirements of the Water Framework Directive. Noting the absence of detail in relation to the adequacy of the surface water drainage design measures and the failure to demonstrate that the on-site wastewater treatment system would be in accordance with the EPA Code of Practice for Domestic Wastewater Treatment Systems (P.E. <10) (2021), I have concluded that it cannot be ruled out that the proposed development will not pose a risk to surface and ground water bodies.

10.2. Given the position above the Dunmore (site code IE_WE_G_0005) ground waterbody (status “good”) and the c.1.3m distance to the Dalgan_050 (site code IE_WE_30D010600) river waterbody (status “good”), I consider that the proposed development may prevent the future attainment/maintenance of a ‘Good’ water status and could result in the deterioration of existing water quality of the above named waterbodies. The proposed development would not therefore be consistent with the Water Framework Directive.

10.3. In my opinion, this would merit a refusal of permission and would be a new issue which the Commission may wish to seek the views of the parties on. Given this and

the other recommended reasons for refusal I do not propose to add it as a recommended reason for refusal.

11.0 Recommendation

11.1. I recommend that permission be refused for the below 4 no. reasons.

12.0 Reasons and Considerations

1. Having regard to the Galway County Development Plan 2022 – 2028 and the scale of the development of an industrial nature on unzoned lands in a predominantly rural landscape, the proposed development would be contrary to Policy CD 1 (Rural Enterprises), would be excessive in scale for the site and surroundings, would be visually out of character for the area, would fail to adequately respect the rural setting contrary to Policy Objective PM 10 and would fail to have a positive impact on the visual quality of the area contrary to Policy Objective PM 11 of the Development Plan. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.
2. Having regard to the Galway County Development Plan 2022 – 2028 and noting the absence of evidence that the new road layouts are designed in accordance with the Design Manual for Urban Roads and Streets (2019), the absence of a Traffic and Transport Assessment to demonstrate that the carrying capacity and safety of the R328 would not be materially impacted, and the absence of a Mobility Management Plan and any detail regarding the nature of the proposed use and likely trip numbers to and from the site, the proposed development would materially contravene Policies Objectives NNR2, NNR3, NNR 7 and DM Standards 28 and 34 of the Development Plan where such compliance is required. The proposed development would therefore be contrary to the proper planning and sustainable development of the area.

3. Having regard to the Galway County Development Plan 2022 – 2028 and to the submitted Site Characterisation Form, the reported percolation results significantly outside the normal ranges, the trial hole photos suggesting saturated soil throughout the year and evidence of a high water table on the site, the Commission is not satisfied that wastewater from the proposed development would be safely treated and disposed of on the site. The proposed development would therefore be prejudicial to public health and contrary to Policy Objective WW6 of the Development Plan and would be contrary to the proper planning and sustainable development of the area.

4. Having regard to the requirements of the Galway County Development Plan 2022 – 2028 and to the information received, particularly the failure to demonstrate the minimisation of areas of hardstanding on the site and the satisfactory use of nature-based drainage measures, the Commission is not satisfied that the surface water generated on site can be satisfactorily attenuated and discharged to the adjoining drain. Therefore, if permitted as proposed the development would materially contravene Policy Objective WW 7 and would contravene DM Standard 67 of the Development Plan and therefore would 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.

Ciarán Daly

Planning Inspector

6th March 2026

Appendix 1 - Form 1

EIA Pre-Screening

An Coimisiún Pleanála Case Reference	PL-500337-GY-25.		
Proposed Development Summary	Construction of two no. warehouse units and two no. industrial/workshop units, completion of roads and services and on-site wastewater treatment system.		
Development Address	Garrafrauns, Quinaltagh, Dunmore, 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) and does it equal or exceed any relevant quantity, area or limit where specified for that class?			
Yes			EIA Mandatory EIAR required
No	X		Proceed to Q.3
3. Is the proposed development of a class specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) but does not equal or exceed a relevant quantity, area or other limit specified [sub-threshold development]?			
		Threshold	Comment (if relevant)
No			Conclusion No EIAR or Preliminary Examination required
Yes	X	Part 2, Class 10(b)(iv). Threshold: 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	Proceed to Q.4

		parts of a built-up area and 20 hectares elsewhere. Site area 1.632ha.		
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4. Has Schedule 7A information been submitted?		
No	X	Preliminary Examination required
Yes		Screening Determination required

Inspector: _____ Date: _____

Appendix 2

Form 2 – EIA Preliminary Examination

Case Reference	PL-500337-GY-25.
Proposed Development Summary	Construction of two no. warehouse units and two no. industrial/workshop units, completion of roads and services and on-site wastewater treatment system.
Development Address	Garrafrauns, Quinaltagh, Dunmore, Co Galway.
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).	Briefly comment on the key characteristics of the development, having regard to the criteria listed. Four light industrial buildings of total 1,800sqm on a site area of 1.632ha in a rural village. Areas of hardstanding and roads in the vicinity.
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 capacity of natural environment e.g. wetland, coastal zones, nature reserves, European sites, densely populated areas, landscapes, sites of historic, cultural or archaeological significance).	Briefly comment on the location of the development, having regard to the criteria listed The village edge area includes some housing to the south-east and north-west, woodland to the north and otherwise mainly agricultural lands. There is an adjacent ditch running along part of the northern boundary and other water based ditches to the north. I note no cultural heritage or natural heritage sites in the vicinity.
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).	Having regard to the characteristics of the development and the sensitivity of its location, consider the potential for SIGNIFICANT effects, not just effects. The scale and light industrial nature of the development would give rise to no significant environmental effects on the site or in the vicinity.

Conclusion	
Likelihood of Significant Effects	Conclusion in respect of EIA
There is no real likelihood of significant effects on the environment.	EIA is not required.

Inspector: _____ **Date:** _____

DP/ADP: _____ **Date:** _____

(only where Schedule 7A information or EIAR required)

Appendix 3

Screening for Appropriate Assessment Test for likely significant effects				
Step 1: Description of the project and local site characteristics				
Brief description of project	Construction of two no. warehouse units and two no. industrial/workshop units, completion of roads and services and on-site wastewater treatment system.			
Brief description of development characteristics and potential impact mechanisms	Partially grassland site with some trees and significant areas of hardstanding/gravel/stone areas. Close proximity to water course to the west which flows to the Lough Corrib SAC.			
Screening report	None.			
Natura Impact Statement	None.			
Relevant submissions	None.			
Step 2. Identification of relevant European sites using the Source-pathway-receptor model				
European Site (code)	Qualifying interests ¹	Distance from proposed development (km)	Ecological connections ²	Consider further in screening ³ Y/N
Lough Corrib SAC (site code 000297)	<p>Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) [3110]</p> <p>Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetea [3130]</p> <p>Hard oligo-mesotrophic waters with benthic</p>	c.1.7km	Indirect potential connection via drains on the northern boundary to the Dalgan River_050 to the west which flows south to the SAC.	Yes

	<p>vegetation of Chara spp. [3140]</p> <p>Water courses of plain to montane levels with the Ranunculion fluitantis and Callitriche-Batrachion vegetation [3260]</p> <p>Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210]</p> <p>Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) [6410]</p> <p>Active raised bogs [7110]</p> <p>Degraded raised bogs still capable of natural regeneration [7120]</p> <p>Depressions on peat substrates of the Rhynchosporion [7150]</p> <p>Calcareous fens with Cladium mariscus and species of the Caricion davallianae [7210]</p> <p>Petrifying springs with tufa formation (Cratoneurion) [7220]</p> <p>Alkaline fens [7230]</p> <p>Limestone pavements [8240]</p>			
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	<p>Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0]</p> <p>Bog woodland [91D0]</p> <p>Margaritifera margaritifera (Freshwater Pearl Mussel) [1029]</p> <p>Austropotamobius pallipes (White-clawed Crayfish) [1092]</p> <p>Petromyzon marinus (Sea Lamprey) [1095]</p> <p>Lampetra planeri (Brook Lamprey) [1096]</p> <p>Salmo salar (Salmon) [1106]</p> <p>Rhinolophus hipposideros (Lesser Horseshoe Bat) [1303]</p> <p>Lutra lutra (Otter) [1355]</p> <p>Najas flexilis (Slender Naiad) [1833]</p> <p>Hamatocaulis vernicosus (Slender Green Feather-moss) [6216]</p>			
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¹ Summary description / **cross reference to NPWS website** is acceptable at this stage in the report
² Based on source-pathway-receptor: Direct/ indirect/ tentative/ none, via surface water/ ground water/ air/ use of habitats by mobile species
³if no connections: N

Step 3. Describe the likely effects of the project (if any, alone or in combination) on European Sites

AA Screening matrix

Site name Qualifying interests	Possibility of significant effects (alone) in view of the conservation objectives of the site*	
	Impacts	Effects
<p>Site 1: Lough Corrib SAC (site code 000297)</p> <p><u>Qualifying Interests:</u> Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) [3110] Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetea [3130] Hard oligo-mesotrophic waters with benthic vegetation of Chara spp. [3140] Water courses of plain to montane levels with the Ranunculion fluitantis and Callitriche-Batrachion vegetation [3260] Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210] Molinia meadows on calcareous, peaty or clayey-silt-laden soils</p>	<p>Direct: None.</p> <p>Indirect: Potential surface water run-off and dust run-off during construction. Potential pollution to water channels from unknown discharges associated with unknown operation types and impacts from wastewater treatment discharges which have not been demonstrated to accord with the EPA Code of Practice and from surface water disposal where adequate provision for same has not been demonstrated, at operational stage.</p>	<p>Noting the water based connections to the SAC and the relatively close distance whereby dilution of pollutants is less likely, potential pollutants to the SAC via water channels from construction and operations that have not been outlined in the application documentation including noting that the type of operations and their characteristics have not been detailed. This could significantly effect the water quality on which the qualifying interests of the SAC rely.</p>

<p>(Molinion caeruleae) [6410]</p> <p>Active raised bogs [7110]</p> <p>Degraded raised bogs still capable of natural regeneration [7120]</p> <p>Depressions on peat substrates of the Rhynchosporion [7150]</p> <p>Calcareous fens with Cladium mariscus and species of the Caricion davallianae [7210]</p> <p>Petrifying springs with tufa formation (Cratoneurion) [7220]</p> <p>Alkaline fens [7230]</p> <p>Limestone pavements [8240]</p> <p>Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0]</p> <p>Bog woodland [91D0]</p> <p>Margaritifera margaritifera (Freshwater Pearl Mussel) [1029]</p> <p>Austropotamobius pallipes (White-clawed Crayfish) [1092]</p> <p>Petromyzon marinus (Sea Lamprey) [1095]</p> <p>Lampetra planeri (Brook Lamprey) [1096]</p>		
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Salmo salar (Salmon) [1106]		
Rhinolophus hipposideros (Lesser Horseshoe Bat) [1303]		
Lutra lutra (Otter) [1355]		
Najas flexilis (Slender Naiad) [1833]		
Hamatocaulis vernicosus (Slender Green Feather-moss) [6216]		

Likelihood of significant effects from proposed development (alone): Yes

If No, is there likelihood of significant effects occurring in combination with other plans or projects?

Step 4 Conclude if the proposed development could result in likely significant effects on a European site

It is not possible to exclude the possibility that the proposed development alone would result significant effects on Lough Corrib SAC.
An appropriate assessment is required on the basis of the possible effects of the project 'alone'. Further assessment in-combination with other plans and projects is not required at screening Stage.

Screening Determination

Significant effects cannot be excluded In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that it is not possible to exclude that the proposed development alone will give rise to significant effects on the Lough Corrib SAC European Site in view of the site conservation objectives. Appropriate Assessment is required. This determination is based on:

- The potential pathway to the SAC via drains adjacent to the north of the site which lead to the watercourse to the west which flows to the SAC.
- The failure to demonstrate that wastewater would be treated on the site in accordance with the EPA Code of Practice for Domestic Wastewater Treatment Systems (P.E. <10)

(2021) and that there is adequate provision for the attenuation and disposal of surface water on the site.

- In the absence of details regarding the type of activities that would take place on the site, the potential for the emission of pollutants at construction and operational stages to drains and onwards via the watercourse to the west to the SAC.

Appendix 4

Water Framework Directive Screening and Assessment

WFD IMPACT ASSESSMENT STAGE 1: SCREENING			
<p>Step 1: The proposed development is for the construction of two no. warehouse units and two no. industrial/workshop units, completion of roads and services and on-site wastewater treatment system.</p> <p>.</p> <p>Site Area 1.632ha</p> <p>Total floor area 1,800sqm</p> <p>The site is within a rural area with water services and no public wastewater services.</p> <p>There are no surface water bodies running through the site. The site is above the Dunmore (site code IE_WE_G_0005) ground waterbody (status “good”) and is c.1.3km from the Dalgan_050 (site code IE_WE_30D010600) river waterbody (status “good”).</p>			
An Bord Pleanála ref. no.	PL-500337-GY-25	Townland, address	Garrafrauns, Quinaltagh, Dunmore, Co Galway.
Description of project		The proposed development consists the construction of two no. warehouse units and two no. industrial/workshop units, completion of roads and services and on-site wastewater treatment system.	

<p>Brief site description, relevant to WFD Screening,</p>	<p>The relatively flat site includes drains which lead to the nearest surface water body to the north-west. There are significant areas of hardstanding/gravel/stone surfaces on the site. The site is outside the urban edge of the village of Garrafrauns.</p> <p>The proposed urban development would be located at a remove from the above water bodies but with connections via the drains and via groundwater.</p>
<p>Proposed surface water details</p>	<p>Drains and on-site attenuation tank.</p>
<p>Proposed water supply source & available capacity</p>	<p>Public network connection.</p>
<p>Proposed wastewater treatment system & available capacity, other issues</p>	<p>On-site wastewater treatment system.</p>
<p>Others?</p>	

Step 2: Identification of relevant water bodies and Step 3: S-P-R connection

Identified water body	Distance to (m)	Water body name(s) (code)	WFD Status	Risk of not achieving WFD Objective e.g.at risk, review, not at risk	Identified pressures on that water body	Pathway linkage to water feature (e.g. surface run-off, drainage, groundwater)
River Waterbody	c.1.3km to the north-west.	Dalgan_050 (site code IE_WE_30D0 10600) river waterbody (status "good")	Good.	Not at risk.	Pressures from nutrient run-off from adjacent agricultural lands, sedimentation impact of discharges from urban WWTP, sewer overflows	Potentially via drains linking to surface waterbody.

					during heavy rainfall, industrial discharges and invasive species can lead to bank destabilisation.	
Ground Waterbody	Underlying site.	Dunmore (site code IE_WE_G_0005) ground waterbody (status "good")	Good.	Not at risk.	Pressures from nutrient run-off from adjacent agricultural lands and from local landfill.	Potentially via untreated wastewater and surface water to groundwater.

Step 4: Detailed description of any component of the development or activity that may cause a risk of not achieving the WFD Objectives having regard to the S-P-R linkage.

CONSTRUCTION PHASE

No.	Component	Waterbody receptor (EPA Code)	Pathway (existing and new)	Potential for impact/ what is the possible impact	Screening Stage Mitigation Measure*	Residual Risk (yes/no) Detail	Determination** to proceed to Stage 2. Is there a risk to the water environment? (if 'screened' in or 'uncertain' proceed to Stage 2.
1.	Surface	Dalgan_050 (site code IE_WE_30 D010600) river waterbody (status "good")	Link from drains which flow to this waterbody through intervening rural land.	Siltation, pH (Concrete), hydrocarbon spillages	Standard construction best practice	No	Screened out

2.	Ground	Dunmore (site code IE_WE_G_ 0005) ground waterbody	Pathway exists	Spillages.	As above	No	Screened out
OPERATIONAL PHASE							
3.	Surface	Dalغان_05 0 (site code IE_WE_30 D010600) river waterbody	Link from drains which flow to this waterbody through intervening rural land.	Untreated wastewater and surface water, unknown potential pollutant impacts as type of activity/land use is not specified	Detailed specifications in relation to adequacy of provisions for surface water drainage and wastewater treatment to EPA Code. Require details of operational activity to specify.	Yes	Screened in

4.	Ground	Dunmore (site code IE_WE_G_ 0005) ground waterbody	Pathway exists	Untreated wastewater and surface water, unknown potential pollutant impacts as type of activity/land use is not specified	Detailed specifications in relation to adequacy of provisions for surface water drainage and wastewater treatment to EPA Code. Require details of operational activity to specify.	Yes	Screened in
DECOMMISSIONING PHASE							
5.	N/A						
STAGE 2: ASSESSMENT							
Details of Mitigation Required to Comply with WFD Objectives							

Groundwater				
Development/Activity e.g. abstraction, outfall, etc.	<u>Objective 1: Groundwater</u> Prevent or limit the input of pollutants into groundwater and to prevent the deterioration of the status of all bodies of groundwater	<u>Objective 2 : Groundwater</u> Protect, enhance and restore all bodies of groundwater, ensure a balance between abstraction and recharge, with the aim of achieving good status*	<u>Objective 3:Groundwater</u> Reverse any significant and sustained upward trend in the concentration of any pollutant resulting from the impact of human activity	Does this component comply with WFD Objectives 1, 2, 3 & 4? (if answer is no, a development cannot proceed without a derogation under art. 4.7)

	Describe mitigation required to meet objective 1:	Describe mitigation required to meet objective 2:	Describe mitigation required to meet objective 3:	
Development Activities 3 and 4: Operation phase, groundwater and surface water	<p>Use of SUDS measures. Surface water drainage measures would ensure no increase in surface water run-off by comparison with existing situation.</p> <p>On-site wastewater treatment system to EPA Code.</p> <p>Details required of operational activities to establish if any other controls required to prevent emissions.</p>	Same as for Objective 1.	Same as for Objective 1.	No, mitigation measures not specified and wastewater treatment system inadequate.

