



Comhairle Chontae na Gaillimhe
Galway County Council

Draft **Athenry Local Area Plan** 2023-2029

August 2023

Chief Executive Report

Draft Athenry Local Area Plan 2023 – 2029

Chief Executive Report on Submissions Received on the
Draft Athenry Local Area Report 2023 – 2029

Chief Executive Report

Forward Planning
Galway County Council
Áras an Chontae
Prospect Hill
Galway



Comhairle Chontae na Gaillimhe
Galway County Council

1.0 Chief Executive's Report Introduction

1.1 Legislative Requirements Relating to the Local Area Plan

The Draft Athenry Local Area Plan (LAP) 2023-2029 has been prepared in accordance with the legislative framework for planning and development, including the following:

- Section 18, 19, and 20 of the Planning and Development Act 2000 (as amended).
- Planning and Development Regulations 2001 (as amended).
- EU Directives, including the EU Habitats Directive 92/43/EEC, Birds Directive 2009/147/EC, Water Framework Directive 2000/60/EC, Strategic Environmental Assessment (SEA) Directive 2001/42/EC.
- Flood Directive 2007/60/EC and associated national legislation.
- Requirements under the *Planning and Development (Strategic Environmental Assessment) Regulations 2004* (SI No. 436 of 2004) as amended by the *Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011* (S.I. No. 201 of 2011), the *European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011* (SI No. 200 of 2011) amending the *European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004* (S.I. No.435 of 2004), and the 2004 Strategic Environmental Assessment Guidelines.
- Requirements under Article 6 (3) and (4) of the EU Habitats Directive and the European Communities (Birds and Natural Habitats) Regulations 2011 in relation to Appropriate Assessment.

LAP's, including the Athenry LAP 2023-2029, shall be consistent with the policy objectives of the Galway County Development Plan (GCDP) 2022 - 2028, its Core Strategy and the Regional Spatial and Economic Strategy for the North-West Region 2010-2032 and National Planning Framework 'Project Ireland 2040'. Local Area Plans must also have regard to Ministerial Guidelines under the Planning and Development Act 2000 (as amended) and be in accordance with National and European legislation.

1.2 Chief Executive's Report to the Elected Members

In accordance with Section 20 of the Planning and Development Act 2000 (as amended), this Chief Executive's Report on submissions received on the Draft Athenry LAP is being submitted to the Municipal District Members for their consideration for a maximum period of 6 weeks. When performing their functions, the Members of the Authority shall be restricted to considering the proper planning and sustainable development of the area, the statutory obligations of any Local Authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

The Act requires that the Chief Executive's Report shall:

- (i) List the persons who made submissions or observations.
- (ii) Summarise the issues raised by the persons in the submissions or observations.

(iii) Contain the opinion of the Chief Executive in relation to the issues raised, and his or her recommendations in relation to the proposed local area plan, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

The Members shall consider the proposal to make a LAP and the Chief Executive's Report. Following the Members consideration of the Chief Executive's Report, the LAP shall be made in accordance with the recommendations of the Chief Executive as set out in their report, or the Members can by resolution decide to make the plan otherwise than as recommended in the Chief Executive's Report or decide not to make the plan.

Where following the consideration of the Chief Executive's Report, it appears to the Members that the Draft LAP should be altered, and the proposed alteration would be a material alteration of the Draft Local Area Plan, the Planning Authority shall, not later than 3 weeks after passing of a resolution, publish notice of the proposed material alteration(s) in at least one newspaper circulating in the area and send notice of the proposed material alteration(s) to the Minister, the Board and prescribed authorities.

The Planning Authority shall also determine if a Strategic Environmental Assessment (SEA) or an Appropriate Assessment (AA) or both are required to be carried out in respect of one or more of such proposed material alterations to the Draft Local Area Plan. No later than 2 weeks after such a determination, the Chief Executive shall specify such a period that he or she considers necessary as being required to facilitate such an assessment(s).

The Planning Authority must publish a notice in at least one newspaper circulating in the area, of the proposed material alteration(s), and where appropriate in the circumstances the making of a determination that an SEA or AA is required. The Planning Authority must ensure that an SEA or AA is carried out within the period specified by the Chief Executive.

The newspaper notice shall state that a copy of the proposed material alteration(s) of the Draft LAP be inspected at a stated place and at stated times during a stated period of not less than 4 weeks and written submissions or observations with respect to the proposed material alteration(s) of the Draft LAP can be made to the Planning Authority within the stated period and shall be taken into consideration before the making of any material alteration(s).

Not later than 12 weeks after publishing a notice, or such period as may be specified by the Chief Executive, the Chief Executive shall prepare a report on the submissions or observations received and submit a Chief Executive's Report on the material alteration(s) to the Members for their consideration. The Members shall then consider the proposed material alteration(s) of the Draft LAP and the Chief Executive's Report for a maximum period of 6 weeks from when furnished with the report. Following this, the Members, by resolution, shall make the LAP as appropriate, with all, some, or none of the material alteration(s) as published.

Where Members decide to make the LAP, it shall be necessary for the passing of the resolution for it to be passed by not less than half of the Members and any other requirements applying in relation to

such a resolution. Where the Members decide to make a change to the material alteration(s) proposed, further modifications to the material alteration(s) may be made where it is minor in nature and therefore not likely to have significant effects on the environment or the integrity of a European Site and shall not be made where it refers to the increase in the area of land zoned for any purpose, or an addition or deletion from the Record of Protected Structures. When performing their functions under the relevant subsection of the Act, the Members shall be restricted to considering the proper planning and sustainable development of the area, the statutory obligations of any Local Authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

A LAP shall have effect 6 weeks from the day that it is made.

1.3 Structure and Content of the Chief Executive's Report

1.3.1 Issues, Responses and Recommendations

The Athenry LAP 2023-2029 was placed on public display for 6 weeks, from Friday the Thursday 25th May 2023 until Friday 7th July 2023 (inclusive). A public consultation drop-in session was held in Athenry on Thursday 22nd June 2023. A Webinar Event was also held on Thursday 29th June 2023. All events were well attended. A total of 132 submissions were received within the public consultation period.

The full contents of each submission have been considered in the preparation of the Chief Executive's Report. The report lists the persons that made submissions or observations during the public consultation period, summarises the issues raised in the submissions or observations, contains the opinion of the Chief Executive in relation to the issues raised, and their recommendation in relation to the submission, taking account of the proper planning and sustainable development of the area, the statutory obligations of any Local Authority in the area and the relevant policies or objectives of the Government or any Minister of the Government. The responses and recommendations set out in the Chief Executive's Report have been subject to SEA and AA screening and are considered to be appropriate and acceptable in terms of these requirements.

The submissions received have been divided into 2 main groupings comprised of the following:

- Prescribed Authorities
- General Public and Other Persons/Bodies

The issues raised by the Prescribed Authorities have been dealt with separately first. The Prescribed Authorities are specified in relation to Local Area Plans under the Planning and Development Act 2000 (as amended), the Planning and Development Regulations 2018 and the Planning and Development (SEA) Regulations 2004-2011. The remaining submissions include submissions from the general public, community and other stakeholders. All of the submissions received were individually examined in relation to the various issues raised. A summary of the issues raised in each submission is provided followed by the response and recommendation of the Chief Executive.

The report uses the following text formatting to highlight changes that are recommended to the Draft Atherny Local Area Plan:

- Existing Text – Shown in **black text**
- Proposed Addition – Shown in **red text**
- Proposed Deletion – Shown in ~~red text with red strike through~~

Once the Elected Members have made their decisions regarding the recommended changes, all agreed deletions will be removed and any agreed additions and consequential changes will be inserted into the proposed alterations to the Draft Local Area Plan, as appropriate.

1.3.2 Appendices

This includes a list of all submissions received on the Draft Atherny LAP 2023-2029 including any late submission(s).

- Appendix A - Infrastructure Assessment Proposed Residential Lands
- Appendix B - Updated Map 2
- Appendix C - Updated Local Transport Plan
- Appendix D - Flood Zone Mapping A and B
- Appendix E - Infrastructure Assessment Proposed Employment Lands
- Appendix F - Updated Strategic Flood Risk Assessment
- Appendix G - List of Submissions Received

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The Office of Planning Regulator (OPR) acknowledges the considerable and evident work that was put into the preparation of the Draft Local Area Plan (LAP) including the Local Transport Plan (LTP).

Recommendations issued by the OPR related to clear breaches of the relevant legislative provisions of the national and regional policy framework and/or the policy of Government. The Planning Authority is required to implement or address recommendations made by the OPR to ensure consistency with relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding provisions of a plan on issues that are required to ensure policy alignment.

The Office considers that the Draft Athenry LAP 2023-2029 sets out a positive, evidence -based, planning strategy to guide the development of Athenry over the 6-year plan period. In particular, the plan provides a clear shared vision for the town, and a framework as how this can be achieved.

The OPR notes that the draft LAP does not include an Infrastructure Assessment to inform the residential and employment zoning objectives in the plan. Further assessment is required in relation to this issue.

In relation to employment and enterprise, the Office welcomes the inclusion of zoned land to ensure the settlement becomes more self-sustaining and facilitates people to work near where they live. The OPR is concerned that the location of the lands zoned for such uses is not consistent with an integrated approach to land use and transport planning.

In relation to residential zoned land, the office considers that further consideration should be given to phasing of such lands based on proximity to the town centre and availability of services and the sequential approach to development or with the Governments Town Centre First: A Policy Approach for Irish Towns (2022) (TFC) Approach.

It is within this context that the submission sets out **three Recommendations and six Observations under nine themes:**

1. Residential Development - compact growth, sequential approach and infrastructure capacity

Recommendation 1 – Residential Land Use Zoning

Having regard to:

- NPO 72a-c and Appendix 3 of the NPF;
- the *Development Plans, Guidelines for Planning Authorities (2022)*; and
- NPO 3c and NPO 18a,

the planning authority is required to:

- (i) prepare an Infrastructure Assessment for all residential lands zoned under the draft LAP in accordance with the methodology for a tiered approach to land zoning under Appendix 3 of the NPF, relating to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage, water supply and/or additional service capacity. It must also include, if required, a reasonable estimate of the full cost of delivery of the required infrastructure to the identified zoned lands;
- (ii) omit any lands which cannot be justified under (i) - i.e. lands that cannot be serviced within the life of the plan;
- (iii) review and where relevant amend the phasing of all residential land use zonings (ie Residential Phase 1 and Residential Phase 2) having regard to the findings of the Infrastructure Assessment, proximity to the town centre and the sequential approach to zoning.

Chief Executive's Response:

- (i) The tiered approach as advocated by the NPF sought to differentiate between zoned land that is available for development and zoned land that requires significant further investment in infrastructure services for development to be realized. This approach was a central consideration when determining the land use zonings set out in the Draft LAP. Extensive survey work was carried out in the town to ascertain the level of infrastructure services available across the town taking note of services such as the train, and connectivity between residential, schools and employment sites. Regular contact and collaboration with Uisce Éireann also informed the preparation of the LAP. As indicated in the Draft LAP, lands have only been identified for development in a co-ordinated manner where they are able to connect to existing development services i.e. road access, foul sewer drainage and water supply and where service capacity is available, and can therefore accommodate new development. Footpath access was also assessed, connectivity was taken into account in an effort to promote more sustainable forms of development. These lands are also positioned within the existing built-up footprint of the town or continuous to existing developed lands. Attached in Appendix A is an Infrastructure Assessment-Proposed Residential Lands. The submission from Uisce Éireann indicates that the lands that have been identified are serviceable with some connections required. The residential phase 1 lands have connectivity in relation to footpaths etc and where extension of the sewer is required this can be generally achieved without accessing third party consent along the public footpath and where street lighting exists.
- (ii) It is considered prudent to identify lands for residential development in the plan area for short to medium development potential. The quantum of residential phase 1 lands accords with the Core Strategy of the GCDP 2022-2028. As part of the preparation of the Local Area full consultation took place with Uisce Éireann. The quantum of Residential Phase 2 lands reflects the position of Athenry as a town of Strategic Potential in the RSES. The policy objective ASP 5 relates specifically to Residential Development Phasing. In addition, while some of the Residential Phase 2 lands are seen for longer term residential development it is considered that the tranche of lands with the policy objective ASP 6 should be further examined and this policy objective amended to include reference to the preparation of an Urban framework Plan within the lifetime of the LAP. This will future-proof residential lands and allow a more collective

analysis of this tranche of lands for development. It is considered prudent to safeguard these Residential Phase 2 lands in this manner. Map 2 should also be updated to reflect the extent of the Urban Framework Plan area. It is considered that policy objective ASP 6 would be amended as follows:

ASP 6 ~~Access arrangements on Residential Phase 2 Lands~~ Urban Framework Plan in Residential Phase 2 lands (Caheroyn).

- a) It is a policy objective of Galway County Council to prepare an Urban Framework Plan on Residential Phase 2 lands in the lifetime of the local area plan. These lands are identified on Map 2.
- b) Any proposals relating to development on lands zoned Residential Phase 2 at Caheroyn, Athenry (identified on Map 2) which are subject to compliance with Policy Objective ASP 5, shall consider as part of the Urban Framework Plan access arrangement to these lands in a co-ordinated manner, where active travel measures are the focus point for any future development.

On review and in light of a number of submissions received and planning history the lands identified in Fern Hill as part of the Draft Athenry LAP 2023-2029, it is considered that these should be rezoned to (i) Transport Infrastructure to reflect the ownership of Irish Rail in relation to parcel measuring 1.67ha and (ii) the area measuring 1.51ha should be rezoned to Residential Phase 2.

- (iii) As outlined above the lands have been zoned accordingly in close collaboration with statutory agencies such as Uisce Éireann. There are several land parcels zoned Residential which could be regarded as closer to the town, however there is connectivity and permeability constraints that need to be addressed, which would require medium term measures. The Residential Phase 1 lands have been identified and zoned based on connectivity.

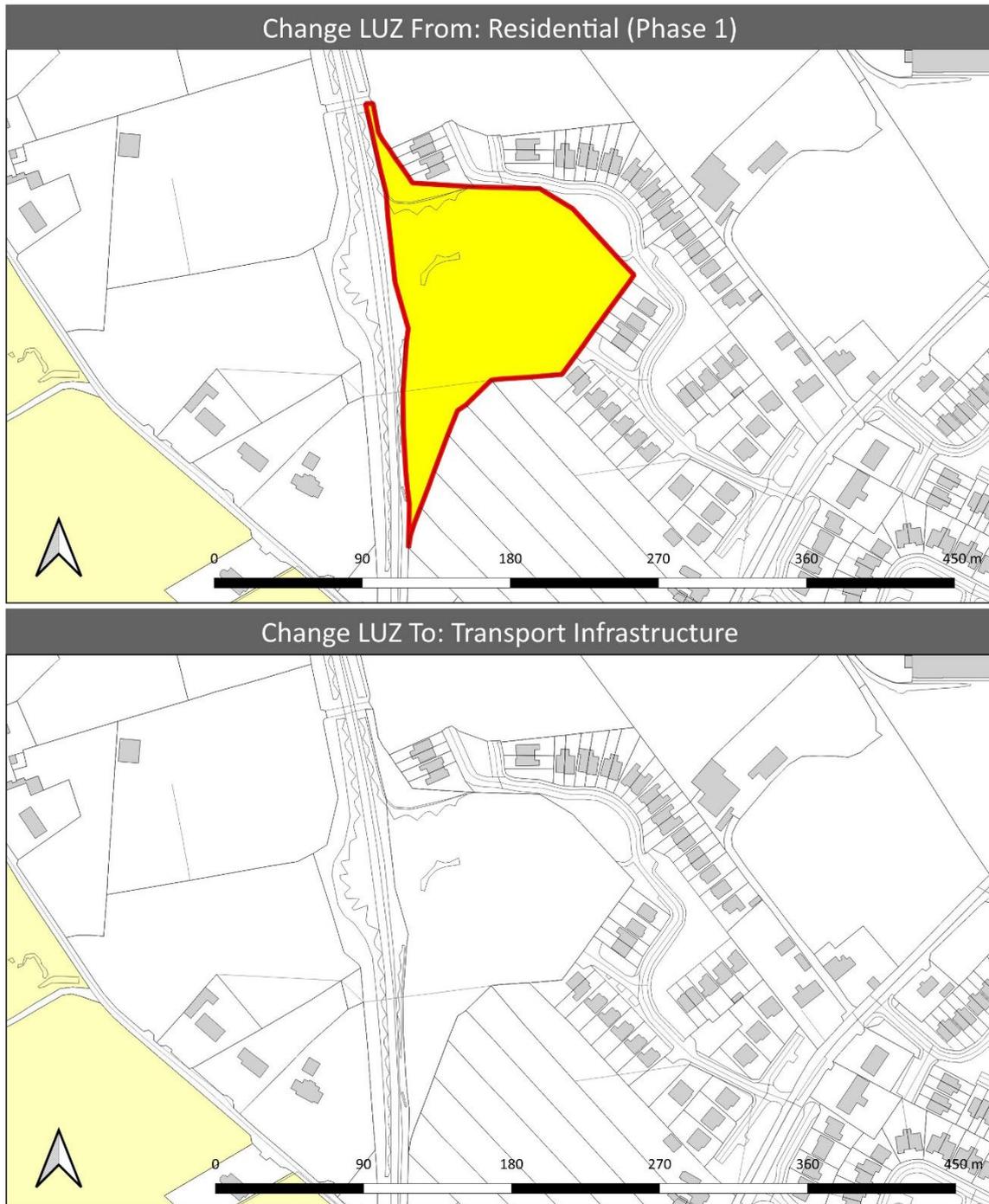
Chief Executive's Recommendation:

- (i) Appendix A - Infrastructure Assessment - Proposed Residential Lands
- (ii) Amend Policy Objective ASP 6 and illustrate the Urban Framework lands on Map2 as follows:

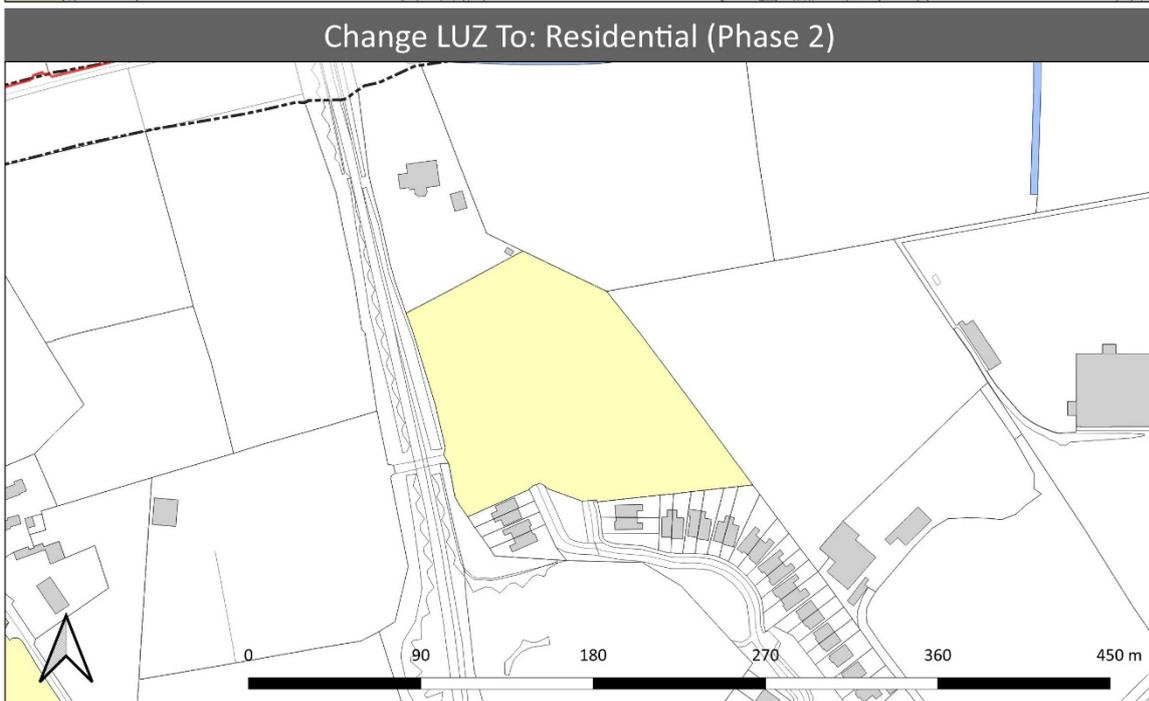
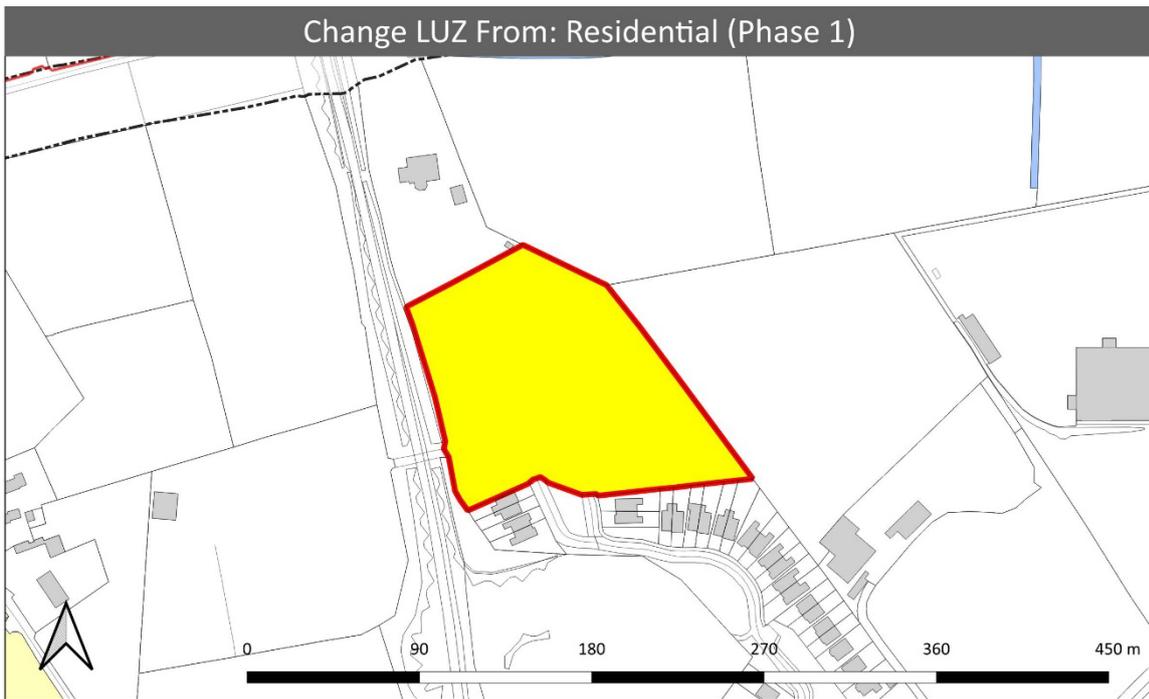
ASP 6 ~~Access arrangements on Residential Phase 2 Lands~~ Urban Framework Plan in Residential Phase 2 lands (Caheroyn).

- a) It is a policy objective of Galway County Council to prepare an Urban Framework Plan on Residential Phase 2 lands in the lifetime of the local area plan. These lands are identified on Map 2.

- b) Any proposals relating to development on lands zoned Residential Phase 2 at Caherbyn, Athenry (identified on Map 2) which are subject to compliance with Policy Objective ASP 5, shall consider **as part of the Urban Framework Plan** access arrangements to these lands in a coordinated manner, where active travel measures are the focus point for any future development.
- The rezoning of the Residential Phase 1 lands at Fern Hill:
Rezone land from Residential Phase 1 to Transport Infrastructure



Rezone land from Residential Phase 1 to Residential Phase 2

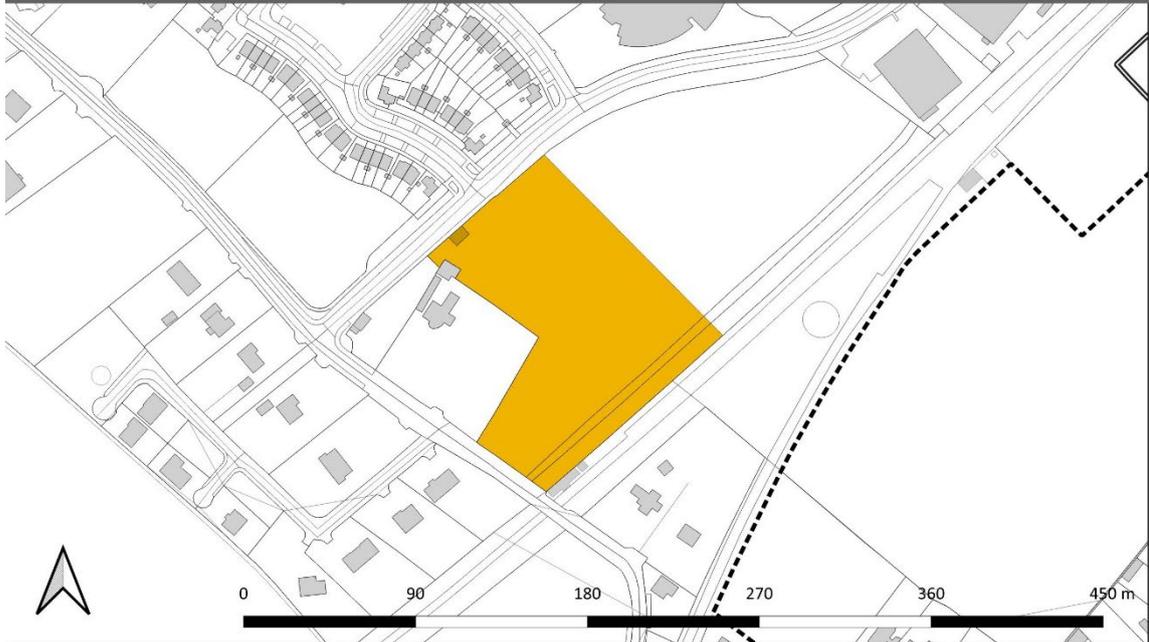


- The reallocation of these Residential Phase 1 lands as follows:
Rezone land from Agricultural to Residential Phase 1

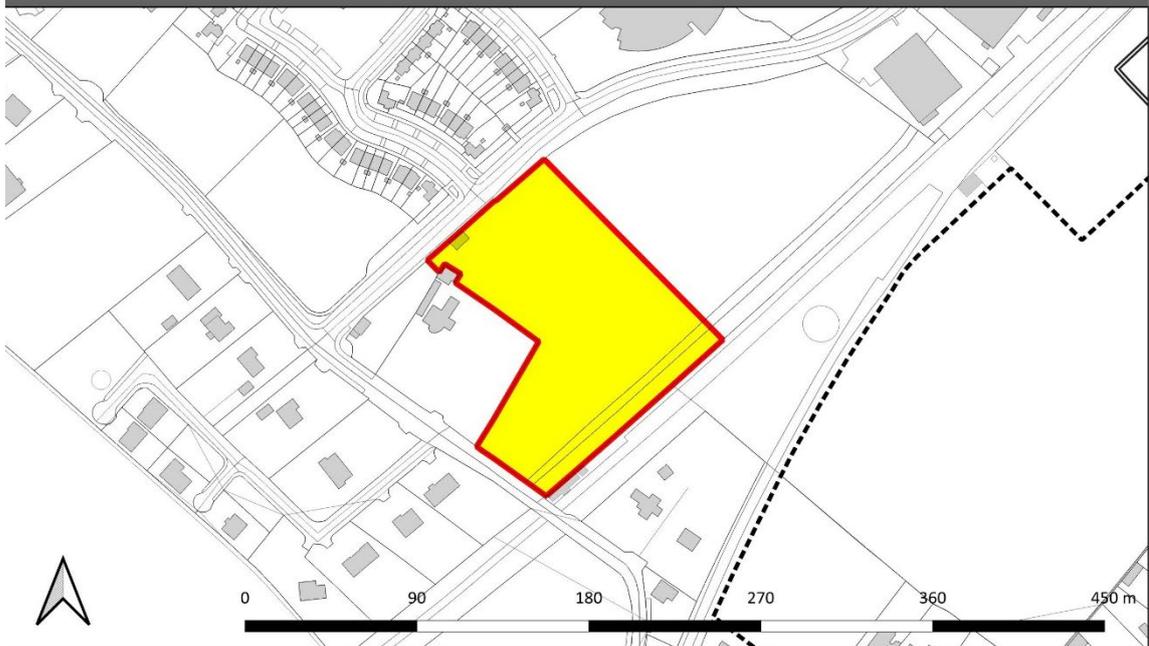


Rezoning land from Business and Enterprise to Residential Phase 1

Change LUZ From: Business & Enterprise



Change LUZ To: Residential (Phase 1)

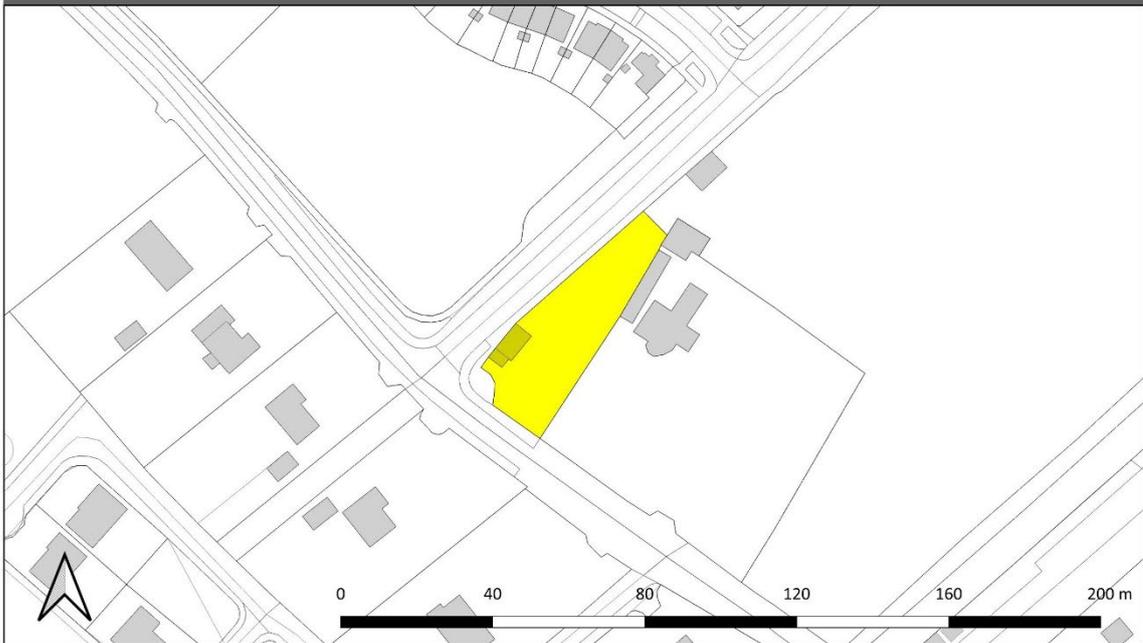


Rezone land from Business and Enterprise to Existing Residential

Change LUZ From: Business & Enterprise



Change LUZ To: Residential Existing



3.2. Mix of Housing Types

Observation 1 - Mix of Housing Type

Having regard to NPO 33 and RPO 7.20 the planning authority is advised to review the land use zoning matrix to require that an appropriate mix of housing type, tenure, density and size is provided in all new residential areas and in appropriate brownfield/infill areas to meet the needs of the population of Athenry. This approach should allow for Apartments to be Permitted in Principle on residential zoned lands.

Chief Executive’s Response:

It is considered appropriate to include Apartments under Residential use as permitted in principle.

Chief Executive’s Recommendation:

From:

Residential Uses	C1	C2	R	I	BT	BE	T	CF	OS	A	PU	TI
Apartments ^{P1}	P	O	OP ²	N	N	N	N	N	N	N	N	N

To:

Residential Uses	C1	C2	R	I	BT	BE	T	CF	OS	A	PU	TI
Apartments ^{P1}	P	O	P	N	N	N	N	N	N	N	N	N

4. Town Centre and Regeneration

Observation 2 - Town Centre Regeneration(vacancy)

Having regard to:

- NPO 6 and NPO 7; and
 - Town Centre First: A Policy Approach for Irish Towns (2022),
- the planning authority is requested to amend existing policy objectives to commit to including measurable targets for the reduction of vacancy for the plan period and a strategy for

the monitoring of same as part of the Town Centre Management Plan as well as the Strategic Sites database.

Chief Executive's Response:

In relation to policy objective **ASP20 Strategic Sites in Athenry** and **ASP21 Active Land Management in Athenry**, the inclusion of these policy objectives is the first stage in the identification of strategic sites and addressing the underutilized or vacant lands in the county. Once the cycle of Local Area Plans is completed the database of brownfield field and infill sites will be developed in line with other monitoring databases within the Plannings Section. Other measures will be included in supporting the re-activation of vacant land or underutilized lands.

Chief Executive's Recommendation:

No Change

5. Transport and Accessibility

Observation 3 - Transport and Mobility

Having regard to:

- RPO 6.27 and 6.28;
 - NPO 27, NPO 54 and NPO 64;
 - **ILUTP 3 of the Galway County Development Plan 2022-2028; and**
 - **section 2.7 of section 28 Guidelines Spatial Planning and National Roads Guidelines for Planning Authorities (2012);**
- (i) the planning authority is requested to review Section 2.9 – Transportation and Movement – Local Transport Plan, as well as Section 4.0 Policy Objectives, to provide clearer policies and objectives regarding the delivery and phasing of the key infrastructural requirements of the LTP, particularly those interventions and measures required to enhance pedestrian and cycling infrastructure in the town. In particular, further details should be provided of the interventions illustrated as part of Figure 5 – Emerging Preferred of the draft LAP;
- (ii) the planning authority should consider including policies to ensure the protection of the national road network. Consultation with TII is advised in relation to this matter.

Chief Executive's Response:

- (i) The LTP has been updated which reflects the clarity in relation to policy objectives identified in the LAP and reflected in the LTP. Where new development is proposed to take place within the Settlement boundary of Athenry, active travel and public transport measures proposed within the LTP serving the relevant lands will be delivered in a timely fashion to support the sustainable development of these areas. Through the planning process, all new major residential or employment developments (including expansion of existing) in Athenry, will be required to provide active travel infrastructure throughout the proposed developments, integrated with the wider active travel network and the proposed set of measures outlined in this LTP. This is to ensure future residents/employees are provided with a choice of sustainable transport modes at the outset, and that connectivity across the network is maintained as Athenry is developed into the future. The preparation of the LTP is a joint initiative and collaboration with the Planning Directorate and the Infrastructure & Operations Directorate and this partnership will be progressed with the implementation and advancement of the LTP measures.

- (ii) Whilst the policy objectives developed for the LTP focus on the need to improve travel by sustainable modes in Athenry, in accordance with DoECLG Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities', an overarching aim in the development of all LTP transport measures is the need to safeguard the strategic function, capacity and safety of the existing national road network in the Plan area. Chapter 6 Transport and Movement, Policy Objective NR1 Protection of Strategic Roads of the GCDP 2022 - 2028 seeks to protect the strategic transport function of national roads, including motorways. Policy Objective NNR 1 Restricted Regional Roads proposes to safeguard the capacity and safety of Restricted Regional Roads and NNR 2 Safeguard Regional and Local Roads to safeguard the carrying capacity and safety of the County's regional and local road network. It is not considered necessary to replicate these Policy Objectives in the Draft Athenry LAP 2023-2029.

Chief Executive's Recommendation

See Appendix C Local Transport Plan

6. Climate change mitigation and adaption

Observation 4 – Flood Zone Mapping

Having regard to National Policy Objective 57 and *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009) (Flood Guidelines), the planning authority is requested to overlay the extent of Flood Zones A and B on the land use zoning maps in the draft LAP to provide for greater transparency and to inform zoning decisions. The planning authority is advised to consult with the Office of Public Works in relation to this observation.

Chief Executive's Response:

In relation to this observation, it should be noted that the extent of flood zones A and B on the land use zoning maps were illustrated but the transparency may not have been clearer because of the colours on the zoning maps. The flood zones A/B will be illustrated with greater clarity.

Chief Executive's Recommendation:

Revise the transparency on the zoning maps illustrating Flood Zone A and B.

See updated Flood Mapping - Appendix D

Recommendation 2 – Strategic Flood Risk Management

Having regard to National Policy Objective 57 and the Planning System and Flood Risk Management Guidelines (2009) and the Department of Environment, Community and Local Government Circular PL 2/2014, the planning authority is required to:

- (i) review and amend the Strategic Flood Risk Assessment of the draft Plan to ensure that it is fully consistent with the Plan Making Justification Test as set out in the Guidelines. The review should include all zoned lands that can accommodate vulnerable uses including those referred to specifically in General Notes no. 6 of the 'General Notes on Land Use Zoning Matrix'.
- (ii) review the Strategic Flood Risk Assessment for the draft LAP to include the most up to date flooding extents available for the Furzypark area of Athenry, to ensure that any flood risk associated with this area is assessed in accordance with the application of the sequential approach and the
- (iii) Justification Test where appropriate and having regard to potential climate change effects and potential impact on adjoining vulnerable uses.

The planning authority is required to omit or amend zonings that do not meet the Justification Test in accordance with the provisions of the aforementioned Guidelines and Circular.

The planning authority should consult with the Office of Public Works regarding this recommendation.

Chief Executive's Response:

- (i) The Justification Tests have been reviewed as indicated on the accompanying updated SFRA (see Table 6 in Section 4). See Appendix F Strategic Flood Risk Assessment and See Chief Executive's Recommendation (GLW-C60-45)
- (ii) Justification Test - Furzypark. See Chief Executive's Recommendation (GLW-C60-45)

Chief Executive’s Recommendation:

See Appendix F Updated Strategic Flood Risk Assessment

See Chief Executive’s Recommendation (GLW-C60-45)

Observation 5 – SuDS and Nature Based Solutions

Having regard to NPO 58 and the integration of climate action into the planning system, the planning authority is requested to include a robust framework and guidance in relation to the identification and use of SuDS and nature-based solution in the two Opportunity Sites identified in section 3 of the draft Plan.

Chief Executive’s Response:

As provided for by measures integrated into both the existing, already in force, GCDP 2022 – 2028 and the Draft Athenry LAP 2023 – 2029 (including the measures reproduced at Section 4), new developments will be required to incorporate the requirement for Sustainable Urban Drainage Systems (SuDS) where appropriate. In combination, these provisions contribute towards a sustainable drainage strategy for the Plan area.

It is likely that some or all of the following SuDS techniques will be applicable to key development sites within Athenry, including to manage surface water run-off:

- Rainwater harvesting
- Green roofs
- Infiltration systems
- Proprietary treatment systems
- Filter strips
- Filter drains
- Swales
- Bioretention systems
- Trees
- Pervious pavements
- Attenuation storage tanks
- Detention basins
- Ponds and wetlands

Each land use zoning objective, including those for opportunity sites, allows for a range of possible uses and the LAP, and associated County Development Plan, allow for a range of scales, heights, densities configurations/layouts and designs. The application of different SuDS techniques will be dependent on a combination of the site’s characteristics and the development (when known) being considered.

Because of the infinite range of land use types and associated developments and designs that could occur on sites within the Plan area under this type of Plan, the guidance from the SFRA is to consider the full range of SUDs available, taking into account the recommendations and information provided above and below. On key development/opportunity sites, in particular, integrated and area-based provision of SuDS and green infrastructure may be appropriate in order to avoid reliance on individual site by site solutions.

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, soakaways and green roofs. The integration of nature-based solutions, such as amenity areas, ecological corridors and attenuation ponds, into public and private development initiatives, is applicable within the provisions of the Plan and should be encouraged. Applications for development should take into account, as appropriate, the Department of Housing, Local Government and Heritage's (2022) "Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas - Water Sensitive Urban Design - Best Practice Interim Guidance Document".

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.

Further to the above, proposals for development should consider the Construction Industry Research and Information Association (CIRIA) SuDS Manual 2015 and any future update of this guidance and Greater Dublin Strategic Drainage Study documents in designing SUDS solutions, including the New Development Policy, the Final Strategy Report, the Code of Practice and "Irish SuDS: guidance on applying the GSDS surface water drainage criteria".

Chief Executive's Recommendation:

No Change.

Recommendation 3 – Lands Zoned for Employment Uses

Having regard to the following:

- an evidence-based rationale for both the requirement to zone lands and the location and type
- of employment in accordance with section 6.2.5 of the Development Plans, Guidelines for Planning Authorities (2022), and the sequential approach to zoning for high intensity employment in accordance with Appendix A section 1.4;
- NSO 1 compact growth, NPO 54, NPO 72a, NPO 72b and NPO 72c of the NPF; and

- provisions of the Climate Action and Low Carbon Development (Amendment) Act 2021 and the Climate Action Plan 2023 and the goals of the National Sustainable Mobility Policy (2022), and Town Centre First: A Policy Approach for Irish Towns (2022),

the planning authority is required to:

- (i) provide an evidence-based rationale for the overall quantity and the spatial location of all employment generating land use zonings;
- (ii) prepare an Infrastructure Assessment for all employment lands zoned under the draft LAP in accordance with the methodology for a tiered approach to land zoning under Appendix 3 of the NPF. This must also include, if required, a reasonable estimate of the full cost of delivery of
- (iii) the required infrastructure to the identified zoned lands at draft and final plan stages of the plan making process;
- (iv) consider all relevant infrastructural capacity in applying the tiered approach to zoning;
- (v) omit any lands which cannot be justified under ((i) and (ii) above; and
- (vi) include clear objectives in the LAP to facilitate and require pedestrian / cycling permeability between the employment lands and the town centre before or in tandem with the development of the said land.

Chief Executive's Response:

- (i) Athenry is identified as a town of "Strategic Potential" in the Regional Spatial Economic Strategy (RSES). Within the settlement strategy of the GCDP 2022-2028 Athenry settlement category is regarded as a "Large economically active service centre that provides employment for the surrounding areas". The economic role of Athenry must be examined within the economic corridor of Oranmore to Athenry corridor must be developed/promoted and serviced to high international standards to attract further Foreign Direct Investment and indigenous industries/businesses, building on the existing strategic location and infrastructure. This corridor promotes sustainably as a centre for major national and international enterprises in a manner that has been addressed with policy objectives in the LAP and in the GCDP 2022-2028. The lands (circa 88ha) identified as Business and Technology adjacent to the M6 are in the ownership of IDA Ireland and as such the Foreign Direct Investment (FDI) is a key factor in the zoning of these lands. With Government policy in relation to seeking significant investment and job creation on strategic land banks such as these in Athenry, the Local Authority regards the retention of these lands zoned as Business and Technology as a priority for the LAP and the town. A LTP accompanies the LAP and as such there are several measures identified that would improve the accessibility and pedestrian connectivity of these lands to the town. The lands can be accessed and serviced with water and wastewater infrastructure. Through the planning process, all new major employment developments (including expansion of existing) in Athenry, will be required to provide active travel infrastructure throughout the proposed developments, integrated with the wider active travel network and the proposed set of measures outlined in this LTP.

The lands zoned Industrial (developed and undeveloped) are strategically located within the form of Athenry town and are adjacent to residential areas where pedestrian connectivity is a key tenant for the zoning of these lands and again based on the position of Athenry in the settlement category it is considered that these industrial zonings should remain. There is one amendment with industrial zonings at Caheroyn, there is a section of the lands that has been re-evaluated considering submissions received and has been identified at risk of flooding.

The Business and Enterprise Lands (developed and undeveloped) in the main reflect established business at this location and are accessible with pedestrian connectivity.

It is considered that the spatial location of the lands identified for employment uses are appropriate and reflect Athenry's position within the settlement hierarchy of the county.

- (ii) As outlined above the lands are strategically located but please see [Infrastructure Assessment - Proposed Employment Lands](#)
- (iii) Noted See Response to (i) and (ii) above
- (iv) Noted. See response to (i) and (ii) above
- (v) The LTP has been updated to reflect greater permeability and accessibility.
- (vi) Policy objectives included in the LTP are reflected in the Local Area Plan.

Chief Executive's Recommendation:

[See Appendix E: Infrastructure Assessment -Proposed Employment Lands](#)

[See Appendix C-Updated Local Transport Plan](#)

9. Implementation and Monitoring

Observation 6 – Implementation and Monitoring

Having regard to the duty and function of the planning authority under section 15(1) and 15(2) of the Planning and Development Act 2000, as amended, the planning authority is required to provide for Plan implementation monitoring as part of the draft LAP. Note: Chapter 10 of the Development Plans, Guidelines for Planning Authorities (2022) provides useful guidance in this regard.

Chief Executive's Response:

The GCDP 2022-2028 came into effect in June 2022, there are 15 settlement plans and 2 Urban Framework Plans contained in Volume 2. There are a number of Local Area Plans that have been prepared since the adoption of the plan and are going through the various stages of the statutory plan process currently with two remaining settlement plans to be published in Q4 of 2023. As part of the statutory process for the GCDP 2022 – 2028 a mid-term review will occur where all policy and

objectives will be reviewed. As per policy objective **ASP 10 Implementation and Monitoring the core strategy for the settlement will be monitored.**

With the mid-term review of the GCDP 2022 – 2028 if policy objectives are found not to be consistent with LAP, the Planning Authority will initiate the necessary steps to address the consistency factor.

Chief Executive's Recommendation:

No Change

Prescribed Authorities			
Submission No.	Submission Name	Summary of Issues Raised in Submission	Chief Executive's Response
GLW-C60-25	NWRA (Northern and Western Regional Assembly)	<p>A comprehensive submission was received. It is noted that Athenry is described in the Regional Spatial and Economic Strategy ('RSES') as a town with regional potential (along with Westport, Carrickmacross and Virginia). The status of Athenry in the RSES is reflected in the GCDP.</p> <p>Issues and Considerations:</p> <p>It is acknowledged that Athenry LAP 2023 - 2029, references the Plan Hierarchy and demonstrates the position of Athenry in the hierarchy. It makes references to RPO S3.1, which deals with compact growth and RPO 3.13, which references small and medium towns. It also described the pivotal position of Athenry, in terms of rail infrastructure in the region, being at the junction of the Western Rail Corridor and the Dublin to Galway line. It makes specific reference to RPO 6.11-13, which deals with improvements to rail infrastructure.</p> <p>It is stated that there is a high level of consistency in the strategic intentions of the development of the town.</p> <p>In completing its 2-year report, it is referenced that the Assembly did not examine any settlements below key towns. The Athenry LAP outlines population growth, targeting an increase of 30% on the 2016 population by</p>	<p>Chief Executive's Response:</p> <p>Submission noted.</p> <p>The core strategy included in Chapter 2 of the GCDP 2022 - 2028 includes population allocation with associated allocation of lands for residential development on green</p>

		<p>2028. This is extremely ambitious and outstrips the 30% figure by 2040 for key towns in the RSES. The Assembly has examined the preliminary figures from the 2022 Census and estimate that the population increase in Athenry since 2016 was c. 5%. It is stated there is no references in the Athenry LAP as to the low level of progress towards the 2028 figure or any ambition or expectation as to how the 30% figures can be achieved. It is outlined that the quantum of land zoned for residential use including R1, R2, Infill and Town Centre exceeds the amount needed to achieve the 30% growth figure. The R1 lands alone is more than enough to achieve the figure. The Assembly suggest that further consideration be given to making the expected rates of residential delivery align with the quantum of lands zoned. In this regard, the Assembly notes that the Athenry LAP states that R2 lands are not generally developable and that R1 lands can be developed immediately. It is suggested that the inclusion of infrastructure audits would be a useful addition to the written statement in the context of zoning and planning.</p> <p>The Assembly note that a significant jobs announcement for Athenry was made in May; it is expected that 1000 medtech jobs will be created. This vindicates the designation of Athenry as a town with regional potential. In terms of compact development and the jobs-to-population ratio in the National Planning Framework (NPF), there is a reasonable expectation that the</p>	<p>field and brownfield lands. Therefore, the quantum of residential lands identified on the Town Centre lands and Residential Phase 1 lands is in accordance with the Core Strategy. In addition, the quantum of Residential Phase 2 lands has been identified for the medium-long term growth of the town. As part of the preparation of the Draft Athenry LAP 2023 - 2029 a comprehensive analysis was undertaken and consultation with Uisce Éireann was also undertaken. Included in Appendix A is the Infrastructure Assessment-Proposed Residential Lands.</p> <p>The reference to the recent job's announcement is noted. The quantum of lands identified for residential development in the Draft Athenry LAP 2023 - 2029 is considered to accord with the Core Strategy of the GCDP 2022 - 2028 . There are Residential Phase 2 lands identified for the longer term growth of the town and as such if there is the full realization of Residential Phase 1 lands during</p>
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		<p>population of Athenry will grow by 1500 in response to the jobs announcement.</p> <p>In this context, it may be appropriate for the Council to consider ways it could stimulate and/or accelerate the low levels of residential delivery. As part of the plan-making process, the Council could additionally identify R2 lands that are 'shovel-ready 'and have advanced to pre-application or application stage and consider allowing them to be advanced subject to material planning considerations. It is suggested that guiding principles of s4.4.3 of the Development Planning Guidelines may be helpful in this regard. This could be a plausible response to what could develop into a local housing crisis. There are policies in the draft plan that support such an approach- ASP 9 compact growth, ASP 10 Implementation and monitoring, ASP 21 active land management. It is outlined that the circumstances outlined above may allow the council to adopt a more radical response to planning for Athenry, subject to appropriate management controls. The designation of Athenry in the RSES and the GCDP means that such a course would not set a planning precedent for other similarly sized towns in the county.</p> <p>The issue of sustainable mobility is an important part of the Athenry LAP, and it includes references to RPOS 6.26 –32, which deal with LTP and active travel. There is a high level of consistency with the RSES in this area.</p> <p>The Assembly has a few miscellaneous comments on some of the specific policies and objectives in the Athenry LAP;</p>	<p>the life time of the LAP then a review of residential lands will take place. In addition, it is also proposed to amend a policy objective ASP6 in relation to the preparation of a Urban Framework Plan.</p> <p>Noted.</p>
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		<ul style="list-style-type: none"> • ASP 10 refers to implementation and monitoring, which is welcomed, together with intentions to adjust to ensure alignment with policies in the hierarchy; • ASP 12 discusses the preparation of Town Centre Management Plans and references 10 areas which it could examine. It may be possible to include some of these topics into the Atherry LAP itself. • The Assembly notes and supports the concept of Active Land Management in ASP 21. <p>In conclusion it is stated that there is a high level consistency in the Atherry LAP with the relevant policy objectives in the RSES.</p> <p>The Assembly recommends the following:</p> <ol style="list-style-type: none"> 1. Re-examination of the quantum of lands zoned for residential development, in the context of population growth and housing completions since 2016 and recent job announcements. 2. Consideration of the inclusion of infrastructure audits within the written statement in the context of zoning lands. 	<p>Noted. It is considered that the wording in relation to ASP 12 is appropriate and not necessary to include details of same in the LAP itself.</p> <p>Noted</p> <p>Noted. See above.</p> <p>Noted See above.</p> <p>Chief Executive’s Recommendation: No change.</p>
GLW-C60-112	Dept of Housing, Local Government and Heritage	<p><u>Nature Conservation</u></p> <p>A comprehensive submission was received from the Department.</p>	<p>Chief Executive’s Response:</p>

		<p>1. The Department reiterates the comments previously made for the Strategic Environmental Assessment (SEA) draft Scoping Report for the Draft Athenry LAP in relation to Appropriate Assessment.</p> <p>In-combination effects of other plans and projects will also require assessment. Plan level mitigation may include, among other things, setting out provisions to demonstrate that lower level plans or projects will be subject to Appropriate Assessment where necessary.</p> <p>It is advised that if policies and objectives are made conditional on adequate evaluations and assessments being undertaken at lower plan level or at project level, it is advised that, as a minimum, these situations should be subject to preliminary examination and should be noted clearly in the plan. The proposals should:</p> <ul style="list-style-type: none"> • Include a statement of the issue without favouring a specified solution (if a specified solution is put forward, Appropriate Assessment will be required of that solution); • State that issues may arise under Article 6(3) of the Habitats Directive that will require assessment and that alternative solutions may need to be considered to avoid significant effects; • Stress that in deciding on a solution, it will be necessary to comply fully with Article 6(3) (and, if warranted, Article 6(4), including compensatory measures) of the Habitats Directive” 	<p>Noted.</p> <p>The Draft Athenry LAP 2023 – 2029 and associated GCDP 2022 - 2028 include various provisions that contribute towards the appropriate protection of the environment, including European sites.</p> <p>The AA NIR that accompanied the Draft Plan on display has been prepared in compliance with relevant requirements.</p>
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		<p>2. The Plan has identified a significant quantity of lands zoned Business and Technology (c.88 ha) located on the western side of Athenry and within the Strategic Economic Corridor. Combination effects of other plans and projects should be included, most notably the Strategic Economic Corridor.</p> <p>3. Hydrological and Groundwater impacts have been identified as having a potential significant effect on 6 European sites. The plan should specifically outline the theoretical pathway for successful mitigation using relevant references in scientific literature. Detailed assessment will still be required at the project level.</p>	<p>Noted. The SEA Environmental Report that was placed on public display alongside the Draft Plan contains the information required, including information on cumulative effects - refer to Sections 8 of the SEA Environmental Report.</p> <p>There are several mitigation measures stated within the Draft Plan that address water quality for surface waters and groundwater for the potential sources for effects identified in the NIR – namely widely implemented, best practice measures such as the use of sustainable urban drainage systems, connection to public sewer mains for treatment at local wastewater treatment plants, and water supply and conservation for housing and industrial developments. In addition, there are measures for the protection of water courses and recognition of and adherence to the relevant River Basin District Management Plan. These are all listed in Table 5.1 of the NIR (pages 26 and 27).</p> <p>These best practice measures are not a theoretical pathway, but effective basic sanitation measures that have already been implemented for many years, and evidenced as effective (such as diversion of wastewater to wastewater plants for treatment and the use of sustainable urban drainage systems) – and resulting from significant changes made to how wastewater systems are regarded and managed, due to historical damage done to</p>
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		<p>4. The Department has concerns regarding the zoning of the area at the old railway embankment and ballast pit (beside the Curt Ard and Fern Hill Estates) which contains Annex I grassland and populations of Near Threatened species of plants such Dense Flowered Orchid (<i>Neotinea maculata</i>) and Spring Gentians (<i>Gentiana verna</i>) and insects including Small Blue Butterfly (<i>Cupido minimus</i>). This area has been proposed re-zoning for Residential Development</p> <p>In relation to the draft LAP text, the Department recommends some suggested changes to the wording of objectives (for accuracy):</p> <p>ASP 61 European Sites Protect European sites that form part of the European Sites network including Special Protection Areas(SPA)and</p>	<p>public water supply and river systems from the lack of these measures.</p> <p>Regarding potential effects for hydrology from construction phases of projects, these will be assessed, as stated by the submission, at project level and undergo AA as necessary, and cannot be determined in detail at the Plan level. However, there is mitigation measures to ensure that all projects will undergo AA as necessary and that basic design principles are considered at the Plan level.</p> <p>See Chief Executives Response to GLW-C60-101</p> <p>The wording as proposed is considered appropriate in relation to policy objective ASP 61 European Sites.</p>
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		<p>Special Areas of Conservation (SAC) that form part of the Natura 2000 network, in accordance with the requirements in the EU Habitats Directive (92/43/EEC), EU Birds Directive (2009/147/EC), the Planning and Development (Amendment) Act 2010, the European Communities (Birds and Natural Habitats) Regulations 2011 (SI No. 477 of 2011) (and any subsequent amendments or updated legislation) and having due regard to the guidance in the Appropriate Assessment Guidelines 2010 (and any updated/superseding guidance). A plan or project (e.g., proposed development) within the plan area will only be authorised after the competent authority (Galway County Council) has ascertained, based on objective criteria, scientific evidence and a Habitats Directive Assessment where necessary, that:</p> <p>1. The plan or project will not give rise to significant adverse direct, indirect or secondary impacts on the integrity of any European Sites (either individually or in combination with other plans or projects)</p> <p>ASP 62 Trees, Parkland/Woodland, and Hedgerows</p> <p>a) Protect important trees, tree clusters and hedgerows in the plan area and ensure that development proposals take cognisance of significant trees/tree stands. Ensure that all planting schemes use a suitable native variety of trees (excluding Ash).</p>	<p>The wording as proposed is considered appropriate in relation to policy objective ASP 62 Trees, Parkland/Woodland, and Hedgerows.</p>
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		<p>ASP 63 Biodiversity & Ecological Networks</p> <p>Support the protection of biodiversity and ecological connectivity within the Plan Area including woodlands, trees, hedgerows, rivers, streams, natural springs, peatlands, wetlands, stonewalls, and other landscape features such as Esker Riada, where these form part of the ecological network. Seek to retain and/or incorporate these natural features into developments, to avoid ecological fragmentation and maintain ecological corridors.</p> <p>Include objective for “Impact Assessment”.</p> <p>Suggested text: Planning applications for proposed developments within the Plan Area that may give rise to likely significant effects on the environment may need to be accompanied by an Environmental Impact Assessment, an Ecological Impact Assessment, Appropriate Assessment screening report and/or a Natura Impact Statement.</p> <p>Include objective for Protected Habitats and Species</p> <p>Suggested text: Support the protection of habitats and species listed in the annexes covered by the EU Habitats Directive (92/43/EEC, as amended) and Birds Directive (2009/147/EC), and species that are protected under the Wildlife Acts, 1976-2000.</p>	<p>The wording as proposed is considered appropriate in relation to policy objective ASP 63 Biodiversity & Ecological Networks.</p> <p>The issues, relating to impact assessment, protected habitats and species are already covered by the existing planning framework, including existing legislation and the existing GCDP 2022-2028 and the Atherny LAP 2023-2029.</p>
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		<p><u>Archaeology</u></p> <p>The Department welcomes the opportunity to provide observations and comment on the Draft Athenry LAP 2023 –2029 in relation to the protection, conservation and enhancement of the archaeological heritage of the historic town of Athenry and environs. It is noted that the current draft LAP builds on previous plans and aims to achieve robust policies and objectives that address the entire spectrum of archaeological heritage within the settlement boundary.</p> <p>Athenry town and environs, as outlined in Section 1.2 of the Draft LAP (Profile of Athenry), is very rich in archaeological heritage. The Department broadly concurs with the policy objective set out in the draft plan for the protection of the archaeological heritage resource (Policy Objective ASP 41). It is important that the Strategic Aims, established Policy Objectives and Development Management Standards of the over-arching GCDP 2022-2028 that pertain to archaeological heritage are referenced where applicable in the LAP.</p> <p>The Department notes the following regarding the Draft LAP Written Statement:</p> <p>Section 2.6 It is noted that the heritage significance of Athenry is described as follows:</p>	<p>The historical origins of Athenry have been referenced within the Draft LAP2023-2029. In the GCDP 2022 - 2028, <i>Chapter 12 Architectural, Archaeological and Cultural Heritage</i> contains a suite of Policy Objectives that references the importance of architecture and archaeology.</p> <p>Submission noted.</p> <p>Submission noted. It is considered appropriate to remove the wording “archaeological relics” with the term “Archaeological Heritage’ and/or ‘Archaeological Objects’”.</p>
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		<p><i>'The fundamental significance of Athenry is its degree of survival as a medieval fortified town, which includes a number of fine monuments and archaeological relics.'</i></p> <p>The use of the term 'archaeological relics' is not considered appropriate and the term 'Archaeological Heritage' and/or 'Archaeological Objects' is considered more suitable in this regard.</p> <p>It is further noted that Section 2.6 states that:</p> <p><i>'The majority of structures date from the late 19th Century and share many characteristics'.</i></p> <p>It is advised that many of the buildings and structures within the town core of Athenry contain earlier fabric, including masonry and features of medieval origin. It is recommended that this is highlighted in the LAP to assist in pre-empting incidental developmental impacts on historic buildings within the town core.</p> <p>Section 3</p> <p>In reference to Opportunity Sites OPT1 and OPT2 as illustrated on the zoning maps provided are located within (OPT1) and partially within (OPT2) the Zone of Archaeological Potential (ZAP) established for the historic town of Athenry.</p>	<p>It is considered that section 2.6 should be amended to reflect that the buildings and structures with the town contain earlier fabric, including masonry and features of medieval origin.</p>
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		<p>It is recommended that this is referenced in the narrative description of the Opportunity Sites under the headings 'Opportunity' for OPT1 and OPT2 in Section 3.</p> <p>Figure 4 of the Draft LAP is titled '<i>Athenry Built and Natural Heritage</i>'. It is noted that natural heritage is not indicated on this figure. It is recommended that the title be amended to reference 'Archaeological & Built Heritage'.</p> <p>Definition of Archaeology and Archaeological Heritage</p> <p>It is recommended that the LAP's archaeological policies and objectives should have a clear understanding of the Athenry Area, and an explanatory text be included in a statement in the archaeological heritage section. A comprehensive definition follows explaining the importance of archaeology and archaeological heritage.</p> <p>Recommended Over-arching objective for protection of archaeological heritage</p> <p>It will be an objective of the Planning Authority to protect in an appropriate manner all elements of the archaeological heritage and other features of the following categories:</p> <p>It will be an objective of the Planning Authority to protect in an appropriate manner all elements of the archaeological heritage, their setting and other features of the following categories:</p> <p>(a) Sites and monuments included in the Sites and Monuments Record (SMR) as maintained by the</p>	<p>It is considered appropriate to reference the Zone of Archaeological Potential (ZAP) for both Opportunity Sites (OPT 1 and 2).</p> <p>Noted. It is considered that the mapping should be amended to reflect the Archaeological element. The new title should reference 'Archaeological & Built Heritage'.</p> <p>A suite of Policy Objectives relating to the protection of archaeological heritage are set out in <i>Chapter 12 Architectural, Archaeological and Cultural Heritage</i> of the GCDP 2022 - 2028. Both the narrative and supporting Policy Objectives sufficiently cover the protection of archaeological heritage and it is not considered necessary to repeat narrative and Policy Objectives in the LAP that has been set out in the GCDP 2022 – 2028 which is the overarching plan for the entire county.</p>
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		<p>National Monuments Service (NMS) of the Department of Housing, Local Government and Heritage (DHLGH).</p> <p>(b) Monuments and Places included in the Record of Monuments and Places (RMP) as established under section 12 of the National Monuments (Amendment) Act 1994.</p> <p>(c) Historic monuments and archaeological areas included in the Register of Historic Monuments as established under section 5 of the National Monuments (Amendment) Act 1987.</p> <p>(d) National monuments subject to Preservation Orders under the National Monuments Acts 1930 to 2014 and National Monuments which are in the ownership or guardianship of the Minister for Housing, Local Government and Heritage or a local authority.</p> <p>(e) Archaeological objects within the meaning of the National Monuments Acts.</p> <p>(f) Archaeological features not as yet identified but which may be impacted on by development.</p> <p>Protect archaeological heritage by preserving in-situ or preservation by record with preservation in situ being the first option. If this cannot be achieved, then preservation</p>	<p>This methodology is set out in <i>Chapter 12 Architectural, Archaeological and Cultural Heritage</i> of the GCDP 2022 – 2028 and as such is not considered necessary to repeat.</p>
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		<p>by record will be required. This will require the full archaeological excavation and recording of the monument/site. Excavation will also include appropriate reports, post excavation, analyses and publications. Costs of assessing and mitigating archaeological impacts will be considered as part of development costs.</p> <p>Recommended further objectives and policies to protect the archaeological heritage</p> <ul style="list-style-type: none"> • Protect and enhance archaeological monuments, historic wrecks and archaeological objects and their settings and amenities, having particular regard to the importance of historic graveyards, national monuments in the ownership/guardianship of the Minister for Housing, Local Government and Heritage or the Local Authority and, in general, monuments, historic wrecks, and archaeological objects which, through their presence in the landscape or seascape, provide tangible evidence of the past. • Promote and facilitate appropriate forms of access including disabled access to archaeological monuments and historic wrecks, including maintaining or developing means of access. Provide appropriate, accurate signage and interpretive material where physical access is not possible. • Ensure all aspects of archaeological heritage and underwater cultural heritage, in all environments, are 	<p>There is a suite of Policy Objectives relating to the protection of archaeological heritage set out in the GCDP 2022 - 2028. The Draft Athenry LAP 2023-2029 aims to support and implement these policy objectives.</p> <p>It is considered sufficient the narrative and supporting Policy Objectives that are set out in Chapter 12 Architectural, Archaeological and Cultural Heritage of the GCDP 2022 – 2028 addresses the concerns of the Department.</p> <p>Submission noted.</p>
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		<p>considered in the development process, including impacts on unidentified elements of the archaeological and underwater cultural heritage (in particular in relation to the current and historic courses of the River Nanny).</p> <ul style="list-style-type: none"> • Promote knowledge and appreciation of archaeological and underwater cultural heritage and facilitate access to appropriate guidance regarding its protection and conservation, including at all stages of the development process. • Promote early and comprehensive public access to the results of archaeological excavations carried out as a result of development or conservation projects through publications and the provision of on-site interpretive material even where no physical remains are visible. • Support community initiatives and projects regarding preservation, presentation and access to archaeological heritage and underwater cultural heritage, provided such are compatible with appropriate conservation policies. • Developments that result in the removal of archaeological monuments would not be supported. 	<p>The Council will support the engagement and training with members of the public regarding archaeological and cultural heritage as necessary.</p> <p>Submission noted.</p> <p>Submission noted.</p> <p>Submission noted. This is a matter for the Development Management stage of the planning process.</p>
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		<ul style="list-style-type: none"> • Ensure provision is made in the planning process ensuring the preservation in-situ of significant medieval masonry remains found during the course of a development and the presentation of such remains as part of completed developments. • To secure the preservation in-situ of historic wrecks, and where this is not possible, their preservation by record. • To ensure that provision is made in the planning process ensuring the preservation in-situ of significant medieval masonry remains found during the course of a development and the presentation of such remains as part of completed developments. • Secure the preservation in-situ of surviving above-ground urban medieval and early modern structures, by ensuring that permission for a development does not result in the loss of the remains of such structures. • To secure the preservation in-situ and enhance the setting of significant examples of industrial, military and nautical/maritime heritage that form part of our post-medieval archaeological heritage, and examples of which may date from periods up to and including the 20th century. 	<p>Submission noted.</p> <p>This would be addressed through the Development Management Process in the assessment of a planning application.</p> <p>This would be addressed through the Development Management Process in the assessment of a planning application.</p> <p>This would be considered on a case-by-case basis.</p> <p>This would be addressed through the Development Management Process in the assessment of a planning application.</p>
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		<ul style="list-style-type: none"> • To preserve the setting and amenity of all archaeological monuments, with particular regard for upstanding monuments, by ensuring that development in the vicinity of these archaeological monuments is not detrimental to their character or setting by reason of the development's location, scale, bulk or detailing. • To preserve means of access to monuments currently accessible to the public and to develop further and better access to monuments, including as part of the design of development in their vicinity. • To retain the existing street layout, historic building lines and traditional plot widths where these derive from medieval or earlier origins within towns or villages. • Protect historic graveyards, including through the avoidance of extensions to them would have an inappropriate level of impact on sub-surface archaeological remains or on their setting or amenity and, in that regard, as an alternative to extensions to historic graveyards to endeavour to find alternative locations where additional land for burial is considered necessary. 	<p>This would be addressed through the Development Management Process in the assessment of a planning application.</p> <p>Best practice principles would apply. The Draft Athenry LAP 2023-2029 supports access for all including those with impaired mobility. Policy Objective 14 Universal Access further emphasis this.</p> <p>This would be considered on a case-by-case basis, however the Policy Objectives included in the Draft Athenry LAP 2023-2029, and the GCDP 2022 - 2028 will protect the historic fabric of the town.</p> <p>Best practice principles would apply.</p>
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		<ul style="list-style-type: none"> • Ensure that historic graveyards in the ownership or care of the local authority are managed and maintained in accordance with appropriate conservation standards and that local communities involved in care and maintenance of historic graveyards receive appropriate advice. • Ensure that landscapes of particular historic or archaeological interest or significance are appropriately considered as part of a landscape character assessment, and to ensure the preservation of the character, and amenity of such landscapes. • Ensure that certain developments include appropriate interpretive material regarding the archaeological features identified or uncovered during development or pre-development work, whether or not such features have been preserved in situ or are themselves presented. • Ensure that all signage placed at or near archaeological monuments is appropriate. • Provide appropriate forms of public access to excavations. • Support the incorporation of monuments into designated open spaces and public amenity spaces, 	<p>Best practice principles would apply.</p> <p>Significant historical landscapes are part of the LCA review which is included as an Appendix to the GCDP 2022 - 2028.</p> <p>This would be addressed through the Development Management Process in the assessment of a planning application.</p> <p>Best practice principles would apply.</p> <p>Noted.</p> <p>This would be considered on a case-by-case basis. This would be addressed through the Development Management Process in the assessment of a planning</p>
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		<p>provided this is done in a manner compatible with the protection and proper management and conservation of the monument in question, in particular through ensuring that such monuments are not left vulnerable. Where such incorporation takes place an appropriate and enforceable permanent management and conservation plan will be required.</p> <p>Recommended Development Control Objectives and Policies</p> <ul style="list-style-type: none"> • Development as appropriate should be subject to an archaeological assessment ahead of a grant of planning permission. Such developments include those located at or close archaeological sites or monuments or historic wrecks. Also, extensive development (ground disturbance of ½ hectare or more) or 1km or more in length. Even if no known elements are present, those which would affect significant areas of environments such as wetlands, reclaimed areas of rivers, lakes and coastlines and underwater areas even if no known elements of the archaeological heritage are present and developments requiring EIA. • Proposed developments in areas of the marine environment or inland waterways for where there are not located wrecks may be considered areas of high archaeological potential due to the number of historic ship losses recorded for these areas over time or areas 	<p>application. There are Policy Objectives in the GCDP 2022-2028 that supports these concepts.</p> <p>This would be considered on a case-by-case basis through the Development Management process.</p> <p>This would be considered on a case-by-case basis through the Development Management process.</p>
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		<p>that have a record for locations of archaeological objects in the past, such as those from the river Suck. Developments in riverine lacustrine, intertidal and subtidal environments or archaeological potential should be subject to an underwater archaeological impact assessment before granting planning permission.</p> <ul style="list-style-type: none"> • Ensure archaeological assessment is carried out in accordance with relevant policies, techniques etc. This should also include carrying out of building surveys and assessments of upstanding structures to determine the extend they are structures or medieval or early modern date. • Refer appropriate planning applications to the Department of Housing Local Government and Heritage. • Ensure such assessments are carried out by professionally qualified and experienced personnel. • That permission be refused where the development cannot be carried out in a manner compatible with the protection of the archaeological heritage as provided for in the policy objectives contained in the development plan and national policy. 	<p>This would be considered on a case-by-case basis through the Development Management process.</p> <p>This would be considered on a case-by-case basis through the Development Management process.</p> <p>Best practice approach would apply as necessary.</p> <p>Best practice approach would apply as necessary.</p>
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		<ul style="list-style-type: none"> • Planning conditions should be included to secure the protection of the archaeological heritage, either by preservation in-situ or, where impact cannot be avoided. Conditions shall be added in accordance with guidance. Such conditions may require archaeological assessment. • Further conditions may require appropriate immediate and long-term conservation and management of the archaeological features in question and long-term monitoring of the effectiveness of conservation measures, with appropriate steps required to be taken in the event conservation measures are proving in-effective. • Where preservation by record is required as a condition, such conditions will further require preparation of appropriate follow-up reports etc and the conservation as necessary of archaeological material and objects recovered in excavations. • Conditions may require the presentation of archaeological features where practicable and provision of interpretive material at the site, whether or not any features have been preserved in-situ. 	<p>This would be considered on a case-by-case basis through the Development Management process.</p> <p>Submission noted.</p> <p>This would be considered on a case-by-case basis through the Development Management process.</p> <p>Best practice approach would apply as necessary.</p>
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		<ul style="list-style-type: none"> • Where preservation by record is required, that such conditions will require appropriate follow up reports and analysis. • Where permission is granted, presentation to the public of features may be required, where practical, either off-site or in-situ. • Where excavation is required, further conditions may require the provision of public access to such excavations. • The cost of protection/preservation are borne by the developer. <p>Recommended Climate Change Policies and Objectives for Archaeological Heritage</p> <ul style="list-style-type: none"> • Promote awareness and adaptation of built and archaeological heritage to deal with climate change. • Identification of built and cultural heritage in Local Authority ownership and especially areas at risk of climate change particularly relating to protected structures, etc. • Undertake climate change vulnerability assessments for the historic structures, sites and wrecks in its area. 	<p>This would be considered on a case-by-case basis through the Development Management process.</p> <p>This would be considered on a case-by-case basis through the Development Management process.</p> <p>This would be considered on a case-by-case basis through the Development Management process.</p> <p>The Planning Authority support's the engagement with members of the public regarding archaeological and cultural heritage relating to climate change as necessary.</p> <p>All the points referenced would be considered on a case-by-case basis through the Development Management process.</p> <p>This would be considered on a case-by-case basis through the Development Management process.</p>
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		<ul style="list-style-type: none"> • Develop disaster risk reduction policies addressing direct and indirect risks to the built and archaeological heritage. • Develop resilience and adaptation strategies for the built and archaeological heritage in its area. • Development the skills capacity within the local authority to address adaptation/mitigation/emergency management issues affecting historic structures and sites in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works. 	<p>Chief Executive’s Recommendation: <i>See Chief Executives Recommendation to GLW-C60-101 in relation to Recommendation 1 of the OPR Submission.</i></p> <p>ASP 61 European Sites Protect European sites that form part of the European Sites network including Special Protection Areas(SPA)and Special Areas of Conservation(SAC) that form part of the Natura 2000 network, in accordance with the requirements in the EU Habitats Directive (92/43/EEC),EU Birds Directive (2009/147/EC), the Planning and Development(Amendment) Act 2010, the European Communities (Birds and Natural Habitats) Regulations 2011 (SI No. 477 of 2011) (and any subsequent amendments or updated legislation) and having due regard to the guidance in the Appropriate Assessment Guidelines 2010 (and any updated/superseding guidance). A plan or project (e.g., proposed development) within the plan area will only be authorised after the competent authority (Galway County Council) has ascertained, based on objective criteria, scientific evidence and a Habitats Directive Assessment where necessary, that:</p> <ol style="list-style-type: none"> 1.The plan or project will not give rise to significant adverse direct, indirect or secondary impacts on the integrity of any European Sites (either individually or in combination with other plans or projects)
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			<ul style="list-style-type: none"> Reference the Zone of Archaeological Potential (ZAP) for both Opportunity Sites (OPT 1 and 2) as follows: <p>Opportunity Sites (OPT 1) Description: Area: The site area measure circa 0.318 hectares Zoning: The site is zoned Town Centre and is also located in the Zone of Archaeological Potential (ZAP). Current Land-Use: Unused Opportunity: To develop the prime vacant lands for residential use which would complement the character of the surrounding dwellings and proximate town centre. The overall development proposal for the site shall include a detailed design brief and landscaping plan taking into account the prominent location of the subject site within the town.</p> <p>Opportunity Sites (OPT 2) Description: Area: The site area measures circa 1.277 hectares Zoning: The site is zoned Town Centre and is also located in the Zone of Archaeological Potential (ZAP). Current Land-Use: Greenfield Site Opportunity: To provide retail/office/service uses with a mix of upper floor residential compatible with its Town Centre location. The overall development proposal for the site shall include a detailed design brief and landscaping</p>
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			<p>plan taking into account the prominent location of the subject site within the town.</p> <p>ASP 62 Trees, Parkland/Woodland, and Hedgerows a) Protect important trees, tree clusters and hedgerows in the plan area and ensure that development proposals take cognisance of significant trees/tree stands. Ensure that all planting schemes use a suitable native variety of trees (excluding Ash).</p> <p>ASP 63 Biodiversity & Ecological Networks Support the protection of biodiversity and ecological connectivity within the Plan Area including woodlands, trees, hedgerows, rivers, streams, natural springs, peatlands, wetlands, stonewalls, and other landscape features such as Esker Riada, where these form part of the ecological network. Seek to retain and/or incorporate these natural features into developments, to avoid ecological fragmentation and maintain ecological corridors.</p> <ul style="list-style-type: none"> • Replace the term archaeological relics with term 'Archaeological Heritage' and/or 'Archaeological Objects' is considered more suitable in this regard. • See Appendix B - Map 2. New Title should reference the new title should reference 'Natural, Archaeological & Built, and Natural Heritage'.
GLW-C60-70	Dept of Environment,	A comprehensive submission received from the Department.	Chief Executive's Response: Submission noted.

	<p>Climate Action and Communications</p>	<p>Climate Action</p> <p>The Department notes the next iteration of the Climate Action Plan 2023 (CAP 2023), was launched on the 21st of December 2022. The Local Authority should, therefore, ensure that the LAP is updated and drafted in a manner consistent with this latest CAP 2023, in accordance with Section 15(1) of the Climate Action and Low Carbon Development Act, 2015 (as amended; e.g. reference to the Climate Action Plan 2019 in Section 1.1 Strategic Context should be amended to reference CAP 2023).</p> <p>Renewables</p> <p>The Department welcomes the Local Authority's promotion and facilitation of the development of renewable sources of energy and associated infrastructure within the LAP-Policy Objective ASP 82 Renewable Energy was referenced.</p> <p>The Department supports the land use zoning which states that small scale domestic wind and renewable energy is open for consideration within the Local Area Plan</p> <p>It is suggested by the Department that that further elaboration of domestic scale renewable in Athenry in relation to self-consumers and renewable developments/projects is required.</p> <p>It is stated that the Government has increased its ambitions for renewable energy under the CAP 2023. Local</p>	<p>Submission noted.</p> <p>Reference to CAP 2023 will be included in Section Strategic Context.</p> <p>Noted</p> <p>In Chapter 12: Climate Change Energy and Renewable Resource, a suite of Policy Objectives are set out in order to deal with renewable and low energy carbon sources. A Local Authority Renewable Energy Strategy (LARES) is included in Appendix 1 of the GCDP 2022 - 2028. The Draft Athenry LAP 2023-2029 aims to support these policy objectives.</p> <p>Submission noted.</p>
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		<p>Authorities should have regard to these changes when drafting the LAP.</p> <p>Built Environment and Heating</p> <p>It is noted and supported by the Dept. (Chapter 1.4) in relation to local renewable and low carbon energy sources. It is encouraged in the submission to further consider the energy efficiency of Residential Existing building. CAP 2023 supports the electrification of heating through the National Residential Retrofit Plan. Targets set are 45,000 dwellings by 2025, 400,000 by 2030. The Local Authority is requested to consider the electrification of heating during the LAP and policies regarding these measures are encouraged.</p> <p>District Heating</p> <p>Policy Objective ASP 59 is both noted and supported. Further policies considered for the Draft LAP and recommended by the Department are:</p> <ul style="list-style-type: none"> • National Planning Framework: ‘District heating networks will be developed, where technically feasible and cost effective, to assist in meeting renewable heat targets and reduce Ireland’s GHG emissions’. • Regional Policy Objective 4.20: ‘Support and encourage the development of the bio-economy sector, and facilitate its development for energy production, heat, and storage distribution, in 	<p>Submission noted.</p> <p>Submission noted.</p> <p>The Local Authority Renewable Energy Strategy (LARES) is included as Appendix 1 which accompanies the GCDP 2022 - 2028 and reflects the importance of renewable energy sources.</p> <p>Policy Objective ASP 59 is also referenced in the LAP relating to District Heating.</p> <p>It is the Policy Objective of GCDP 2022 - 2028 to support the delivery of District Heating. In Chapter 7 Infrastructure, Utilities & Environmental Protection there are a suite of Policy Objectives which specifically address renewable energy sources such as district heating.</p>
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		<p>particular advocating Combined Heat and Power Units integrated into District Heating networks...'</p> <p>Telecommunications</p> <p>It is stated in the submission that the digitalisation 5G rollout and enhancing Irelands connectivity can be further supported by County Council's and Local Authorities by referencing them in the Draft Local Area Plan. It would be welcomed by the Department if there was a direct callout in the Draft LAP which supports the 5G rollout.</p> <p>It is encouraged to publish inventories of assets such as ducting that are owned by the state in order to allow ease of accessibility for access seekers.</p> <p>Waste and the Circular Economy</p> <p>In relation to waste policy, County Councils should consult directly with their respective Regional Waste Management Planning Office.</p> <p>CAP 2023 relating to waste to include a Waste Action Plan or Circular Economy. The Dept. notes and supports the Policy Objective ASP 78 in terms of recycling and reduction of waste. The Dept. also encourages further references to the principles of circular economy within the Draft Plan.</p>	<p>Chapter 7 Infrastructure, Utilities and Environmental Protection in the GCDP 2022 - 2028 referenced the rollout of the broadband network and is supportive of same especially with several ICT Policy Objectives.</p> <p>Submission noted.</p> <p>Chief Executive's Recommendation: Update Section 1.1 Strategic Context and reference CAP 2023</p>
GLW-C60-45	Office of Public Works (OPW)	<p>A comprehensive submission has been received from the OPW.</p> <p>The OPW, as lead agency for Flood Risk Management in Ireland, welcomes the opportunity to comment on the</p>	<p>Chief Executive's Response:</p> <p>Submission noted.</p>

		<p>Draft Athenry LAP 2023-2029. This submission is made specifically regarding flood risk and the application of the Guidelines on the Planning System and Flood Risk Management (DECLG/OPW, 2009), hereafter referred to as the 'Guidelines'. Further submissions on the draft Plan may be made by the OPW regarding the estate portfolio, heritage, and other areas of responsibility.</p> <p>The OPW welcomes the acknowledgement of the Guidelines and the preparation of a Strategic Flood Risk Assessment (SFRA). In particular, the OPW welcomes:</p> <ul style="list-style-type: none"> • The commitment to manage flood risk in accordance with the Guidelines and circular PL02/2014, supported by Policy Objectives TKT 42 – 44 • Development Management Standards 2 and 3 supported by policy objective ASP 72 • Policy objective ASP 76 requiring inclusion of specific flood risk mitigation measures in any application for development in any area vulnerable to flooding <p>The following comments highlight opportunities that should be addressed for the Draft Plan before it is finalised:</p> <p>National CFRAM Mapping</p> <p>The flood extents produced for Athenry to Galway Bay as part of the National CFRAM Programme are not currently</p>	<p>Submission noted.</p> <p>Submission noted.</p> <p>Submission noted.</p> <p>Submission noted. The data has been supplied and has been examined. Essentially the lands at risk of flooding are</p>
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		<p>identified on the OPW webportal floodinfo and therefore the flood risk to Furzypark is not identified.</p> <p>The flood zones and constrained land use zoning produced as part of this plan has not included the flood risk to this area. It is suggested that Galway County Council should request the National CFRAM extents for Athenry to Galway Bay from the OPW. In addition, reference to review the sequential approach to zonings is required.</p> <p>Supplied Justification Tests</p> <p>It is stated that it would be useful if a map of the location of these sites/land use zonings would be included.</p> <p>There are three criteria of a Justification Test that need to be satisfied, with the third criteria being the flood risk assessment. It is stated that this flood risk assessment must demonstrate that flood risk can be adequately managed, and the use or development of the lands will not cause unacceptable impacts elsewhere.</p> <p>It is stated that instead of completing the third criterion, the Justification test has included “SFRA recommendation integrated into the Plan for management of risk”. Each Justification Test has answered yes and states “see provisions repeated in Section 4 of this report”. The Justification Test for development plans should be as per Box 4.1 of the Guidelines. It is referenced that Section 4 includes all the County and LAP policies and possible structural and non-structural measures. It is suggested</p>	<p>not zoned Industrial at Furzypark, Athenry. See map attached.</p> <p>The Justification Tests will be reviewed as indicated on the accompanying updated SFRA (see Table 6 in Section 4) and land use zoning updated as relevant.</p> <p>Submission noted.</p>
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		<p>that it would be better if relevant details could be repeated or if more specific reference could be made to applicable details contained in Section 4.</p> <p>Criteria 2: Each criterion of the Plan Making Justification Test must be satisfied for zoning to be considered justified. If any of the criteria outlined in Box 4.1 of the Guidelines have not been satisfied, the justification Test has not been passed. Criteria 2 requires that only land use zonings within or adjoining the urban centre, of settlements which have been targeted for growth can pass the plan making justification test. Zonings/development on the periphery of urban areas cannot pass the Justification Test as they cannot satisfy Criteria 2.</p> <p>Justification Tests have been supplied for some existing developed zonings that cannot satisfy all of Criteria 2 of the test. Reference to text from Box 4.1 of the Flood Risk Guidelines is outlined.</p> <p>For existing development, when avoidance and substitution for a periphery urban area at flood risk is not possible and all criteria of the Justification test cannot be satisfied that a policy objective should be attached to the zoning. This could be a reference to policy objective ASP 64 Constrained land Use that has limitations of new and existing development within this Constrained Land Use zoning.</p>	<p>The Justification Tests will be reviewed as indicated on the accompanying updated SFRA (see Table 6 in Section 4) and land use zoning updated as relevant.</p>
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		<p>Required Justification Tests</p> <p>It is stated that there are proposed land use zonings some of which are classified as highly vulnerable development in the Guidelines, which are in Flood Zone A and B, for which no commentary has been included to indicate that the Plan Making Justification Test has been applied and passed.</p> <p>It is stated that any lands that are undeveloped within Flood Zones A and B, where in an appropriate development is proposed, should be rezoned as a water compatible type zoning in Flood Zone A, and less vulnerable or water compatible type zoning in Flood Zone B, unless it can be demonstrated by the Planning Authority that all criteria of the Plan Making Justification Test have been satisfied.</p> <p>Tourism Zoning</p> <p>There is Tourism Zoning located within a small proportion of Flood Zone A with no Justification having been supplied. These lands include Athenry Castle, where in the Draft Plan it is noted that lands will be limited to water compatible in Flood Zone A, and less vulnerable and water compatible in Flood Zone B. It is stated that development is to be restricted a Justification Test is still required, where these restrictions should be included in criterion 3 of the Test or include a reference to where they are contained in the Draft Plan.</p>	<p>The Justification Tests will be reviewed as indicated on the accompanying updated SFRA (see Table 6 in Section 4) and land use zoning updated as relevant.</p> <p>A small section of the lands is identified in flood zone A, with another section identified in Flood Zone B. The Justification Tests will be reviewed as indicated on the accompanying updated SFRA (see Table 6 in Section 4). Footnote 6 from the Draft Plan’s Land Use Matrix Table 1.7.1 of the plan is applicable in this instance.</p> <p>A small section of the lands is identified in Flood Zone B. The Justification Tests will be reviewed as indicated on the accompanying updated SFRA (see Table 6 in Section 4). Footnote 6 from the Draft Plan’s Land Use Matrix Table 1.7.1 of the plan is applicable in this instance.</p>
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		<p>Community Zoning</p> <p>There is a community zoning located within a small proportion of Flood Zone B for which no Justification Test has been supplied. The site is currently a school which would be considered highly vulnerable in the Guidelines. In the Draft Plan it is noted that these lands will be limited to less vulnerable and water compatible in Flood Zone B. Even though development is to be restricted a Justification Test is still required, where these restrictions should be included in Criterion 3 of the Test or include a reference to where they are contained in the Draft Plan. It is stated that this zoning may not satisfy all sub-criteria of Criteria 2</p> <p>Commercial/Mixed Use Zoning</p> <p>There is a Commercial/Mixed Use zoning located within a small proportion of Flood Zone A and B for which no Justification Test has been supplied. In the Draft Plan it is noted that the lands will be limited to water compatible in Flood Zone A and less vulnerable and water compatible in Flood Zone B. Even though development is to be restricted a Justification Test is still required, where these restrictions should be included in Criterion 3 of the Test or include a reference to where they are contained in the Draft Plan. It is stated that this zoning may not satisfy all sub-criteria of Criteria 2</p>	<p>A small section of the lands is identified in Flood Zone A and B. The lands located in the flood zone are used as playing fields. The Justification Tests will be reviewed as indicated on the accompanying updated SFRA (see Table 6 in Section 4). Footnote 6 from the Draft Plan's Land Use Matrix Table 1.7.1 of the plan is applicable in this instance.</p>
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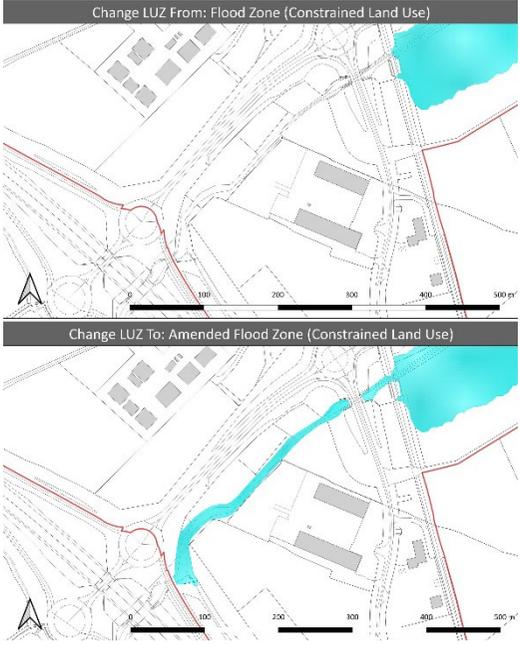
		<p>Relief Road</p> <p>The proposed Athenry Relief Road, for which has part 8 planning permission, cross Flood Zone A and B in a number of locations. The Guidelines classify essential infrastructure such as primary transport as highly vulnerable, and the zoning would not be appropriate in Flood Zones A and B unless a Plan Making Justification Test, completed by the local authority can be satisfied. Local transport infrastructure is classified as less vulnerable and the zoning would not be appropriate in Flood Zones A unless a Plan Making Justification Test, completed by the local authority can be satisfied.</p> <p>Register for Key Flood Risk Infrastructure</p> <p>Mitigation measures have been constructed in Athenry through the minor works scheme. Objective ASP 71 notes the importance of existing bridges in the town in preventing flooding events within Athenry.</p>	<p>Noted. If this road was to be provided for by the Plan, it would have to be subject to the Justification Test. However, the Plan merely recognises the Part 8 Planning Permission that already exists for the road. The wording is amended. As follows:</p> <p>ASP 58 Athenry Relief Road</p> <p>“Facilitate the timely delivery of any improvements to the existing transportation network, including the development of new transport infrastructure and the implementation of traffic management measures subject to normal planning and environmental considerations. Where possible, there will be minimal hedgerow/stone wall removal and beneficial landscaping and planting to maintain wildlife corridors. The Athenry Relief Road has Part 8 Planning Permission. and the remaining undeveloped section may be (or is likely to be) progressed during the lifetime of the Local Area Plan”.</p> <p>Noted. It is not considered warranted for the LAP to identify a register of key flood risk infrastructure This would be dealt specifically with the Athenry Area Office and would possibly be amended within the lifetime of the plan outside of the plan making process.</p>
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		<p>It is requested that there would be merit in including a register of key flood risk infrastructure in the LAP where it would not otherwise be readily identified or protected from interference or removal.</p> <p>Consideration of Climate Change Impacts</p> <p>The OPW welcomes Climate Change and Local Renewable Energy Sources Objective ASP 60 (d) to encourage development which is resilient to climate change by ensuring that development proposals demonstrate sustainable design principles including reducing flood risk.</p> <p>Climate change must be considered at the development management stage however planning authorities also need to consider such impacts in the preparation of plans.</p> <p>It is requested that clarification would be given as how climate change has been considered in the Draft Plan.</p> <p>The OPW welcomes the inclusion of future scenario mapping produced as part of the National CFRAM Programme in SFRA, however it does not appear that the mapping has been considered to inform the Land Use Map. The future scenario mapping can be used to avoid zoning development in areas that could potentially be at flood risk in the future.</p> <p>Reference is made in the SFRA and Draft Plan to ‘2009 OPW Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management’. The OPW</p>	<p>The National CFRAM potential future scenario mapping has been considered in the preparation of the Plan. National CFRAM potential future scenario mapping is appended to the SFRA that was placed on public display alongside the Draft Plan.</p> <p>As identified under SFRA Section 3.4 “Sensitivity to Climate Change”: “Flood Risk Assessments shall apply the precautionary approach recommended in the Guidelines and shall be informed by the advice on the expected impacts of climate change and the allowances to be provided for future flood risk management provided in the OPW’s (2019) Flood Risk Management Climate Change Sectoral Adaptation Plan.”</p> <p>Policy objective FL 15 “Flood Risk Management” of the existing GCDP 2022 – 2028 is as follows: “Ensure each flood risk management activity is examined to determine actions required to embed and provide for effective climate change adaptation as set out in the OPW Climate Change Sectoral Adaptation Plan for Flood Risk Management applicable at the time.”</p>
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		<p>recommend that the SFRA and Draft Plan refer to the Flood Risk Management – Climate Change Sectoral Adaptation Plan 2019 and the guidance on potential future scenarios contained therein.</p> <p>Past Flood Events</p> <p>The OPW has received a flood event report for 6th August 2018 from a member of the public. The report describes floodwater flowing out of the playground near Athenry Castle and onto Bridge Street and down Abbey Row. Galway County Council might submit any reports or information they have in their records in relation to this flood event to the OPW, reportfloodevent@opw.ie, for inclusion in the Past Flood Events database.</p> <p>Drainage District</p> <p>Text in Section 2.2 of the SFRA regarding consulting the OPW in the consideration of applications for developments in the vicinity of the Drainage District should be removed, as the Drainage District is the responsibility of Galway County Council. The OPW should be consulted in relation to the OPW Arterial Drainage Schemes</p> <p>Nature-based Solutions and SuDS</p> <p>The OPW welcomes policy objective ASP 69 promoting the use of SuDS, and the discussion in Section 3.5 Sustainable Drainage Systems and Surface Water Guidance and Strategy of the SFRA, which outlines the various different</p>	<p>Policy objective ASP 77 “Flood Risk Management” of the Draft LAP is as follows: “Ensure each flood risk management activity is examined to determine actions required to embed and provide for effective climate change adaptation as set out in the OPW Climate Change Sectoral Adaptation Plan for Flood Risk Management applicable at the time.”</p> <p>Consultation took place with the Athenry Area Office on foot of this submission and there is a record of a flood event from 6TH of August 2019. There is no record of the event on the 6th of August 2018. In any event there has been an application furnished to the OPW for minor works scheme in relation to the area referenced in the submissions.</p> <p>Noted.</p> <p>Noted. Policy Objective ASP 69 is as follows: “Maintain and enhance, as appropriate, the existing surface water drainage system in Athenry. Ensure that new</p>
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		<p>SuDS techniques that may be applicable in general to development sites in Athenry. Galway County Council might consider including objectives specific to nature-based type solutions.</p> <p>Further guidance on the likely applicability of different SuDS techniques for managing surface water run-off at the two opportunity sites may be considered. There are also a number of large undeveloped zonings, some which are adjoining each other, and Galway County Council could provide guidance for integrated and area based provision of SuDS and green infrastructure that are appropriate in order to avoid reliance on individual site by site solutions.</p>	<p>developments are adequately serviced with surface water drainage infrastructure and promote the use of Sustainable Drainage Systems in all new developments. Surface water runoff from development sites will be limited to pre-development levels and planning applications for new developments will be required to provide details of surface water drainage and Sustainable Drainage Systems proposals. To maximise the capacity of existing collection systems for foul water, the discharge of additional surface water to combined (foul and surface water) sewers is not permitted. Refer also to Section 3.5 of the accompanying SFRA, “Sustainable Urban Drainage Systems and Surface Water Guidance and Strategy”.</p> <p>As detailed under Section 3.5 “Sustainable Drainage Systems and Surface Water Guidance and Strategy” of the SFRA:</p> <p>As provided for by measures integrated into both the existing, already in force, GCDP 2022 - 2028 and the Draft Athenry LAP 2023 – 2029 (including the measures reproduced at Section 4 of this report), new developments will be required to incorporate the requirement for Sustainable Urban Drainage Systems (SuDS) where appropriate. In combination, these provisions contribute towards a sustainable drainage strategy for the Plan area.</p> <p>It is likely that some or all of the following SuDS techniques will be applicable to key development sites within Athenry, including to manage surface water run-off:</p>
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		<p>Errata</p> <p>There is a reference to an OPW website www.cfram.ie in Table 3 Predictive Flood Risk Indicators of the SFRA, this website is no longer available. The OPW recommend referencing www.floodinfo.ie.</p>	<ul style="list-style-type: none"> • Rainwater harvesting • Green roofs • Infiltration systems • Proprietary treatment systems • Filter strips • Filter drains • Swales • Bioretention systems • Trees • Pervious pavements • Attenuation storage tanks • Detention basins • Ponds and wetlands <p>Each land use zoning objective, including those for opportunity sites, allows for a range of possible uses and the LAP, and associated County Development Plan, allow for a range of scales, heights, densities configurations/layouts and designs. The application of different SuDS techniques will be dependent on a combination of the site's characteristics and the development (when known) being considered.</p> <p>Because of the infinite range of land use types and associated developments and designs that could occur on sites within the Plan area under this type of Plan , the guidance from this SFRA is to consider the full range of SUDs available, taking into account the recommendations and information provided above and below. On key</p>
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			<p>development/opportunity sites, in particular, integrated and area-based provision of SuDS and green infrastructure may be appropriate in order to avoid reliance on individual site by site solutions.</p> <p>Noted.</p> <p>Chief Executive's Recommendation:</p> <ul style="list-style-type: none">• See Map Illustrating the Flood Zone A and B at Furzy Park; 
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			<ul style="list-style-type: none"> Amend Policy Objective ASP 73 “Flood Risk Assessment and Climate Change” <p>“Flood Risk Assessment in Athenry shall provide information on the implications of climate change with regard to flood risk in relevant locations. The 2009 OPW Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management (or any superseding document) Flood Risk Management – Climate Change Sectoral Adaptation Plan 2019 shall be consulted with to this effect.”</p> <p>To update text in Table 3 of the SFRA as follows</p> <p>www.cframfloodinfo.ie.</p> <p>To amend Section of the LTP that accompanies the LAP as follows:</p> <p>The completion of the Athenry Relief Road, as illustrated in Figure 6-14, is a Policy Objective in the GCDP 2022-2028. The entirety of the Athenry Relief Road has Part 8 Planning Permission already and this Local Transport Plan, and the associated Athenry Local Area Plan, merely recognises that permission. The Athenry Relief Road Phase 2 (R01) is currently being delivered by GCC. Priority is likely to be given by Galway County Council to completion of the western section of the Athenry Relief Road (R02) as a longer term measure to provide a full bypass of the town. This includes the upgrade of the existing L7125 which is a</p>
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			<p>sub-standard road along with the delivery of segregated pedestrian and cycle facilities. In addition to reducing town centre traffic, this would provide an orbital active mode connection for residents to employment lands and schools to the northeast and southwest of the town.</p> <p>The delivery of the eastern section of the Athenry Relief Road (R03) is likely to be beyond the lifetime of this LTP. As such, it is a recommendation of the plan that this corridor is preserved and the need for the road is reassessed as Athenry continues to grow beyond the current draft LAP.</p>
GLW-C60-14	TII (Transport Infrastructure Ireland)	<p>Submission outlines the role that national roads play within Ireland’s overall transport system. Reference to the significant Exchequer investment that has been made in the development of M6 national road network.</p> <p>Submission references the Trans European Transport Network (TEN-T) and its objectives: a gradual development of the transport network with the core network a priority (by 2030) followed by the remainder of the comprehensive network (by 2050). It is also noted the proximity of the M17/M18, national road to the local area plan.</p> <p>TII would welcome the Draft Plan incorporating an amendment to reflect the foregoing national objectives in Section 4.0 ‘Policy Objectives’ and which can be summarised by the following two proposed objectives.</p> <p>a) to maintain the strategic function, capacity and safety of the national roads network, including planning for</p>	<p>Chief Executive’s Response:</p> <p>A detailed submission has been received by the TII.</p> <p>Chapter 6 Transport and Movement, Policy Objective <i>NR1 Protection of Strategic Roads</i> of the GCDP 2022 - 2028 seeks to protect the strategic transport function of national roads, including motorways.</p> <p>Policy Objective <i>NNR 1 Restricted Regional Roads</i> proposes to safeguard the capacity and safety of</p>

		<p>future capacity enhancements, in the local plan area, and;</p> <p>b) to ensure that the existing transport networks in the LAP area, which have been greatly enhanced, are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users.</p> <p><u>LOCAL AREA PLAN/LOCAL TRANSPORT PLAN INTEGRATION</u></p> <p>TII welcomes that the Council has prepared a LTP to inform and support the preparation of the Local Area Plan. Notwithstanding, TII is concerned that the LTP makes no reference to safeguarding the function of the strategic national road network in the area nor includes such a requirement as a LTP Objective or key performance indicator in Table 4-1. Details in relation to the phasing, delivery and impact of the proposed LTP measures, individually or cumulatively, on the adjoining strategic national road network is unclear in the LAP and LTP.</p> <p>SPECIFIC LOCAL AREA PLAN OBJECTIVES</p> <p>Proposed Zoning Objectives</p> <p>a) Business and Technology</p> <p>There is an extensive ‘Business and Technology’ zoning designation to the southwest of Athenry either side of the rail line and the R-348 Regional Road. While the Draft LTP indicates proposed cycle trackway and footpath upgrades (Measure WC01) along the R-348, the subject lands are also in close proximity to M6 Junction 17 such that it is</p>	<p>Restricted Regional Roads and NRR 2 Safeguard Regional and Local Roads to safeguard the carrying capacity and safety of the County’s regional and local road network. It is not considered necessary to replicate these Policy Objectives in the Draft Athenry LAP 2023-2029.</p> <p>As outlined above there are policy objectives in relation to the support of the strategic road network.</p> <p>The lands identified and zoned Business and Technology in the Draft Athenry LAP 2023 – 2029 are a strategic land bank of employment lands. The lands are owned by the IDA Ireland. Athenry is identified as a town of “Strategic Potential”. Due to the town’s location adjacent to the M6 Galway to Dublin motorway and the railway station where</p>
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		<p>likely that private vehicular trips may remain a dominant and attractive mode option. Reference , Section 2.7 of the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012) require that planning authorities ‘... must make sure that such development which is consistent with planning policies can be catered for by the design assumptions underpinning such junctions and interchanges, thereby avoiding potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users’.</p> <p>While the TII acknowledges that the subject lands have an established zoning, it is stated that there does not appear to be any evidence base established to demonstrate compliance with the requirements of Section 2.7 of the DoECLG Guidelines.</p> <p>The TII specifically requests that the following clarification is sought:</p> <ol style="list-style-type: none"> a) TII is not aware of any evidence base established to demonstrate compliance with the requirements of Section 2.7 of the DoECLG Guidelines, and b) There is absence of detail relating to the coordination, phasing and delivery of active travel measures to support the build out of the extensive zoned lands identified. 	<p>Irish Rail are investing in increasing commuter train service it is considered prudent to identify and zone lands for employment uses. Significant investment has been made by Uisce Éireann in the improvement of wastewater services which curtailed the level of development in Athenry in recent years. It is considered based on the above the lands should remain zoned Business and Technology.</p> <p>Where new development is proposed to take place on future zoned land in Athenry, active travel and public transport measures proposed within the LTP serving the relevant lands will be delivered in a timely fashion to support the sustainable development of these areas. Through the planning process, all new major residential or employment developments (including expansion of existing) in Athenry, will be required to provide active travel infrastructure throughout the proposed developments, integrated with the wider active travel network and the proposed set of measures outlined in this LTP. This is to ensure future residents/employees are provided with a choice of sustainable transport modes at the outset, and that connectivity across the network is maintained as Athenry is developed into the future.</p> <p>In relation to the development potential of these lands it is considered that there is a policy objective contained in the GCDP 2022-2028 and in the Draft Athenry LAP 2023-2029 that requires development criteria and standards to</p>
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		<p><u>MAINTAINING THE STRATEGIC CAPACITY AND SAFETY OF THE NATIONAL ROAD NETWORK</u></p> <p>The TII requests that the Council give due consideration to reflecting the requirements of Section 3 of the DoECLG Spatial Planning and National Roads Guidelines in the LAP and LTP prior to finalisation, in particular the following:</p> <p>(i) TII Publications (Standards)</p> <p>It is requested that there would be an acknowledgement of the complementary TII Publication <i>'The Treatment of Transition Zones to Towns and Villages on National Roads'</i> (TII Publications DN-GEO-03084) in relation to design standards to be applied to national roads and national road junctions in the LAP and LTP.</p> <p>(ii) Traffic and Transport Assessment (TTA) and Road Safety</p>	<p>be achieved from a transportation and environmental perspective. It should be noted that any future planning applications on these lands will require rigorous detailed modelling assessments to be undertaken to assess the impact on the M6/M17 junction, and further consultation with TII will occur at this stage.</p> <p>Text acknowledging these TII publications, and their function will be added to the Final LTP.</p> <p>Text acknowledging these TII publications, and their function will be added to the Final LTP.</p>
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		<p>TII welcomes that the LAP includes an objective related to the requirements for TTA and RSA in Objective ASP 54.</p> <p>Recommendation</p> <ul style="list-style-type: none"> • TII supports the inclusion of requirements outlined in Objective ASP 54. <p>iii. Signage</p> <p>The Policy on the Provision of Tourist & Leisure Signage on National Roads (March 2011) was issued by TII. The purpose of this document is to outline TII’s policy on the provision of tourist and leisure information signs on national primary and national secondary roads in Ireland. With respect to the Draft Local Area Plan, the Planning Authority is also referred to Section 3.8 of the DoECLG’s Spatial Planning and National Roads Guidelines which indicates a requirement to control the proliferation of non-road traffic signage on and adjacent to national roads. The TII requests the provisions of the <i>Policy on the Provision of Tourist & Leisure Signage on National Roads</i> (March 2011)TII would be incorporated into the Draft Local Area Plan</p> <p>iv. Safeguarding national road drainage regimes.</p> <p>TII would welcome consideration being given to including a new objective associated with safeguarding investment in the national road network relating to protection of national road drainage regimes. It is requested that a new Objective would be included in that;</p>	<p>Submission noted. DM Standards 32 Controls of Signage along Public Roads of the GCDP 2022 - 2028 incorporates the provisions of the TII Policy and The DOECLG Guidelines.</p> <p>DM Standard 67: Sustainable Drainage Systems’ (SuDS) and Policy Objective WW7 Sustainable Drainage Systems of the GCDP 2022 - 2028 requires the use of SuDS measures to be incorporated into all new development. Furthermore, all development proposals shall be accompanied by a comprehensive SuDS assessment</p>
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		<p><i>'The capacity and efficiency of the national road network drainage regimes in Galway will be safeguarded for national road drainage purposes'.</i></p> <p>v. Renewable Energy and Grid Connection For all renewable energy developments requiring grid connection to the national grid, TII recommends that an assessment of all alternatives to grid connection routing should be assessed. It is considered inappropriate to only consider utilising the national road as a grid connection route when alternatives are available.</p> <p>It is suggested that consideration be given to including an objective in the Local Area Plan, in relation to renewable energy and in relation to safeguarding the national road network, indicating that grid connection cable routing should seek to utilise available alternatives, as opposed to being placed along the strategic national road network contrary to the provisions of official policy.</p> <p>vi. Noise Official policy requires that development proposals identify and implement noise mitigation measures when introducing noise sensitive uses in the environs of existing and planned national roads, where such mitigation is warranted. The costs of implementing mitigation measures shall be borne by the developer.</p>	<p>including run-off quantity, run of quality and impacts on habitat and water quality. It is considered that this DM Standard 67 and policy objective WW7 addresses the concerns of the TII.</p> <p>Submission noted. A policy objective is already included in Chapter 14 Climate Change, Energy and Renewable Resource of the GCDP 2022-2028; Policy objective EG 2 Electricity Transmission Networks requires that grid connection routing for development proposals should avoid materially impacting the road network, where possible.</p> <p>Noted.</p>
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		<p>It is requested that reference to the requirements of S.I. No. 140 of 2006 Environmental Noise Regulations would be made in the Draft Athenry LAP 2023 – 2029.</p> <p>vii. Other Matters</p> <p>In relation to Greenway proposals, consultation with the Councils own internal project and/or design staff is recommended.</p>	<p>Noted.</p> <p>Noted.</p> <p>Chief Executive’s Recommendation: See Appendix C - Updated Local Transport Plan</p>
GLW-C60-64	National Transport Authority (NTA)	<p>A comprehensive submission has been received. The Planning Authority has been commended on the preparation of the LTP in conjunction with the statutory LAP. A number of specific issues have been raised as follows:</p> <p><u>Land Use Zones</u></p> <p>Employment Zonings</p> <p>Reference to Section 5.5.2 ‘Economic Profile and Jobs Ratio of Settlements’ of the Development Plan sets out a ‘jobs forecast’ for this SEC that identifies a ‘total requirement of approx. 70,000 m² / 70 ha’ of employment lands in Athenry to 2031 (Table 5.3) and ‘confirms that the quantity of zoned land is sufficient to cater for future development requirements.’</p> <p>It is noted that the quantum of hectares identified in the Draft Athenry LAP is referenced at 106.1ha.</p>	<p>Chief Executive’s Response:</p> <p>Noted.</p>

		<p>Business and Technology</p> <p>The lands to the southwest of the town for Business and Technology is specifically referenced. Due to its scale, location, and the potential nature of development it appears that the development of these lands could lead to a significant amount of car-based commuting.</p> <p>While upgrading of cycleways and footpaths is noted for the R418 traversing the site, it is stated that the Draft LTP does not address the future development of the area in terms of defining access arrangements and networks.</p> <p>Development, in terms of layout, scale and density, in this area should be contingent on the provision of sustainable transport networks and should be designed to ensure accessibility and permeability by walking and cycling in line with RPO6.31 of the RSES. The Phasing of development at this location will also be critical to ensuring that it develops in as sustainable a manner as possible.</p> <p>Residential Development</p> <p>It is suggested that Section 2.2 of the LAP, ‘Residential Development’ should also make reference to the ‘NTA document Permeability: Best Practice Guide’. It is suggested that peripheral areas, should be permeable for walking and cycling and associated facilities.</p> <p>It is suggested that the exemptions to allow for development of Phase 2 lands should be conditional on the</p>	<p>In Chapter 15 Development Management Standards of the GCDP 2022 - 2028, applicable to all development, DM Standard 1: Qualitative Assessment-Design Quality, Guidelines and Statements includes a section in relation to Permeability. There are also a range of Policy Objectives contained within the overarching GCDP 2022 - 2028 and the Draft Athenry LAP 2023-2029 to facilitate improved pedestrian and cycling connectivity. Notwithstanding this the LTP has been amended to reflect the increased permeability and accessibility to employment lands. Section 2.6.4 of the LTP has been updated.</p> <p>With the delivery of housing on residential zoned lands a key tenet is the permeability and connectivity to these lands. In this regard a LTP has been prepared which accompanies the land use plan. Section 2.6.4 has been updated to reflect and identify measures that would support this accessibility. The LTP contains measures that have been carefully considered as part of the land use preparation.</p>
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		<p>appropriate level of access to public transport and walking and cycling networks.</p> <p>A number of LAP policy objectives have been listed as follows:</p> <p>ASP 5 Residential Development Phasing It is suggested the reference to “connectivity” in relation to the development of Phase 2 lands should be strengthened in that the development of Phase 2 lands would be conditional on an appropriate level of access to public transport and walking and cycling networks.</p> <p>ASP 11 Town Centre The wording of this policy objective is welcomed.</p> <p>ASP 49 –58 The NTA supports the transport objectives in the LAP ASP 49 –57, in particular ASP 49 to <i>‘Support the implementation of the LTP as set out in Section 3 in accordance with proper planning and sustainable development’</i>.</p> <p>It is noted however that the transport Objectives of the Draft LAP differ from the transport objectives of the LTP. There is no rationale put forward on this. It is</p>	<p>.</p> <p>Noted. In addition to the wording regarding “Connectivity” in policy objective ASP 5 Residential Development Phasing, it is considered that due to the location of these lands that an Urban Framework Plan would be prepared in the lifetime of the LAP in order to fully assess development potential and sustainable transport measures. A new policy objective is proposed to reflect this.</p> <p>Noted</p> <p>Noted</p> <p>There will be greater alignment with the policy objectives of the LTP and LAP.</p>
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		<p>recommended that the Draft LTP Objectives are also included as Draft LAP Objectives.</p> <p>Clarity is requested in relation to the wording relating to Policy Objective 58 Athenry Relief Road in the Draft LAP and the wording associated with wording in the Draft LTP. It is suggested that the wording from the LTP would be reflected in the LAP.</p> <p>4.The Athenry Local Transport Plan The NTA welcomes the development and publication of the LTP, it is suggested that the LTP objectives should be stated as objectives within the LAP.</p> <p>Walking and Cycling Networks The overall proposed walking and cycling measures in the Emerging Preferred Strategy for Athenry are illustrated in Figure 6-1 and Figure 6-2 in the Draft LTP.</p> <p>In relation to specific proposals the NTA notes measures 'WC23' and 'WC24' on Figure 6.1, 'Emerging Walking and Cycling Measures'. It is suggested that these measures should be removed from the section relating to walking and cycling as the alignments shown for these measures is the same as measure "RO3" which refers to the long-term measure for an eastern Athenry Relief Road as set out in Section 6.4 "Road and Traffic Management Options". As this is primarily a roads measure, its inclusion in the</p>	<p>The wording has been updated and reflects that the Relief Road is an existing Part 8, with planning permission.</p> <p>The LTP has been updated and is included in Appendix C.</p> <p>Noted. There will be greater alignment with the policy objectives of the LTP and LAP.</p> <p>Noted. It is acknowledged that these links primarily involve the provision of new road infrastructure, however it is recommended that these links are maintained on the Active Travel map to ensure that the road development incorporates Active Travel facilities and to represent how this would fit into the overall AT network.</p>
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		<p>walking and cycling measures could be regarded as misleading.</p> <p>Deliverability</p> <p>It is suggested that a section on the NTA’s Rapid Build Active Travel Facilities Advice Note should be included in the LTP and LAP to highlight the deliverability of the proposed walking and cycling networks.</p> <p>Strategic Roads</p> <p>The M6 national primary road is a strategic route serving Athenry that is also included as part of the EU Trans-European Transport Networks (TEN-T).</p> <p>In this regard, National Policy Objective 74 seeks to “Secure the alignment of the National Planning Framework and the National Development Plan through delivery of the National Strategic Outcomes”. National Strategic Outcome 2 of the National Planning Framework indicates the need for “Maintaining the strategic capacity and safety of the national roads network including planning for future capacity enhancements”.</p> <p>An objective should be included in the draft LTP to maintain the strategic function of the national roads in line with national policy.</p>	<p>A short section covering this note to be added in Chapter 2 of the LTP.</p> <p>Submission noted. Whilst the objectives developed for the LTP focus on the need to improve travel by sustainable modes in Athenry, in accordance with DoECLG Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’, an overarching aim in the development of all LTP transport measures is the need to safeguard the strategic function, capacity and safety of the existing national road network in the Plan area. As outlined in response to the TII submission, Chapter 6 Transport and Movement, Policy Objective NR1 Protection of Strategic Roads of the GCDP 2022 - 2028 seeks to protect the strategic transport function of national roads, including motorways.</p> <p>Policy Objective NNR 1 Restricted Regional Roads proposes to safeguard the capacity and safety of Restricted Regional Roads and NNR 2 Safeguard Regional and Local Roads to safeguard the carrying capacity and safety of the County’s regional and local road network. It</p>
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		<p>Parking</p> <p>It is outlined that the supply and management of parking is central to the management of travel demand and has a critical influence on mode choice. This would include the location of car parking spaces, the cost of parking and how this is managed. The NTA note that the Draft LTP includes for the rationalisation of car parking at several specific town centre locations, by supporting the reallocation of space to sustainable modes. It is recommended that a Parking Management Strategy would be given further consideration to the quantum and cost of parking within the town in the longer term, as measures identified within LTP.</p>	<p>is not considered necessary to replicate these Policy Objectives in the Draft Athenry LAP 2023-2029.</p> <p>It is considered that the measures outlined in the LTP in relation to the rationalisation of car parking within the town is sufficient at this time along with the other measures in the LTP and LAP that promote sustainable transport measures.</p> <p>Chief Executive’s Recommendation: See Appendix C - Updated Local Transport Plan</p>
GLW-C60-2	The Environmental Protection Agency (EPA)	<p>The Environmental Protection Agency (EPA) raise several issues in their submission as follows:</p> <p>EPA note that the guidance document ‘SEA of Local Authority Land Use Plans – EPA Recommendations and Resources’ should be taken into account.</p> <p>It is suggested that the Council should ensure that the Plan aligns with key relevant higher-level plans and programmes and is consistent with the NPF and the RSES. Recommendations below are suggested for incorporation into the Environmental Report of the Plan: Content of the Environmental Report</p>	<p>Chief Executive’s Response:</p> <p>A detailed submission has been received from the EPA. Noted. This has been taken into consideration in preparing the Draft Athenry LAP 2023-2029.</p> <p>Cognisance has been taken of the NPF, RSES and Section 28 Guidelines in preparing the Draft Athenry LAP 2023-2029.</p>

		<p>Assessment of Alternatives It is suggested to describe the alternatives considered and how the selection and assessment of these has led to the selection of the preferred alternative. In addition, it noted to assess the alternatives against the Strategic Environmental Objectives.</p> <p>Assessment of Environmental Effects It is recommended to assess and document the full range of likely significant environmental effects of implementing the Plan, including the potential for cumulative effect in combination with other relevant Plans/ Programmes and Projects.</p> <p>Mitigation Measures It is suggested that where the potential for ‘some negative environmental effects’ are identified, appropriate ‘mitigation measures’ should be provided to avoid or minimise these.</p> <p>Monitoring It is recommended that the Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It is recommended that the possibility of cumulative effects should be considered and dealt with. In addition, it recommends that the monitoring of both positive and negative effects should be considered.</p>	<p>Submission noted. Appropriate mitigation measures have been identified where necessary.</p> <p>Submission noted regarding the monitoring programme.</p> <p>The recommendations, key issues and challenges described in ‘Ireland’s Environment – An Integrated Assessment 2020 will be considered appropriately.</p> <p>Submission noted.</p> <p>Submission noted.</p> <p>Submission noted. Future amendments to the plan will be screened for likely significant effects as appropriate.</p>
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		<p>It is noted that if the monitoring identifies adverse impacts during the implementation of the Plan it should be ensured that suitable and effective remedial action is taken. Submission references 'Guidance on SEA Statements and Monitoring'.</p> <p>State of the Environment Report – Ireland’s Environment 2020</p> <p>It is recommended that in the finalising of the Plan and integrating the findings of the SEA into the Plan, the recommendations, key issues and challenges described in 'Ireland’s Environment – An Integrated Assessment 2020' should be considered as relevant and appropriate.</p> <p>Future Amendments to the Plan</p> <p>It is recommended that any future amendments to the Plan should screen for likely significant effects, utilising the same method of assessment applied in the “environmental assessment” of the Plan.</p> <p>SEA Statement - “Information on the Decision”</p> <p>It is noted that once the Plan is adopted an SEA Statement should be prepared that summarises the following 4 no. points:</p> <ul style="list-style-type: none"> • How environmental considerations have been integrated in the Plan; • How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan; 	<p>Submission noted.</p> <p>Submission noted. Cognisance will be taken of the four points referenced when the SEA Statement is underway.</p> <p>Submission noted. Relevant bodies will be consulted accordingly.</p> <p>Chief Executive’s Recommendation: No change.</p>
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		<ul style="list-style-type: none"> • The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and, • The measures decided upon to monitor the significant environmental effects to any environmental effects of implementation of the Plan. <p>It is noted that a copy of the SEA Statement should accordingly then be sent to any environmental authority consulted during the SEA process.</p>	
GLW-C60-57	Dept of Agriculture, Food, and the Marine (submitted on their behalf by the OPW, Office of the state architect	This submission relates to lands adjacent to the Clarinbridge River. In the previous Athenry LAP the lands in their entirety was zoned Residential Phase 2. As part of the review of the Draft Athenry LAP 2023-2029, a section of the lands has been zoned Open Space/Recreation and Amenity and the remaining lands outside the settlement boundary. The lands in the flood zone are zoned Open Space/Recreation and Amenity. It is noted that the remaining lands outside settlement boundary are in Flood Zone C. It is requested that the de-zoning of the lands and their removal from the settlement boundary of Athenry LAP would be re-considered. It is stated that these lands would be developed for rapid build housing on behalf of the Department of Children, Equality, Disability, Integration and Youth.	<p>Chief Executive’s Response: Submission noted. It is considered that the lands are zoned appropriately as Open Space/Recreation and Amenity, because they are in flood zone A and B.</p> <p>The remaining lands subject to this submission are outside the settlement boundary as per the Draft Local Area Plan, due to their location adjacent to a flood risk area and due to the poor connectivity and permeability to the town. Based on the configuration of the lands, the adjacent railway line to the west and identified flood zones, it is not considered appropriate to zone these lands Residential.</p> <p>Chief Executive’s Recommendation: No Change</p>

<p>GLW-C60-127</p>	<p>Uisce Éireann</p>	<p>A detailed submission was received from Uisce Eireann which details the scope of the Capital Investment Plan 2020-2024.</p> <p>Sustainable Drainage and Green-Blue Infrastructure Welcomes inclusion of Policy Objectives relating to SuDS and enhancement of green and blue infrastructure. The removal of stormwater from combined sewers, increasing capacity for foul drainage from new developments is relevant to the achievement of compact growth objectives in Athenry.</p> <p>Planned road and public realm projects Development in proximity to Uisce Éireann assets should be in accordance with Standard Details and Codes of Practice. Diversion agreements will be required where an Uisce Eireann Asset is diverted or altered.</p> <p>Where planned development may impact on Uisce Eireann assets, early engagement on road and public realm projects is requested to ensure protection of public water services and ultimately minimise disruption.</p> <p>Availability of Water Services Proposed Core Strategy and Availability of Water Services It is stated that a high-level review of the land-use zoning map has been carried out. Network extensions may be needed to serve some zoned sites. Localised network upgrades may also be required, particularly in areas served</p>	<p>Chief Executive’s Response: The comments from Uisce Éireann are noted. Ongoing engagement and collaboration will continue with the regulatory authority to aid the improvement in the service of water supply and wastewater within the plan area. Galway County Council will support the necessary improvements in relation to network extensions.</p> <p>Submission noted.</p> <p>Submission noted.</p> <p>Submission noted.</p>
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		<p>by sewers with a diameter of 150mm or less or watermains with a diameter of 80mm or less.</p> <p>Longer sewer network extensions maybe required for the residential zoned lands north of Raheen Woods Hotel, to the nearest connection point at Gort Mhaoilir estate.</p> <p>More network reinforcements would be required to service Residential Phase 2 sites. To maximise existing water services a phased sequential approach to development is encouraged. Similarly, to maximise the capacity of collection systems for foul water, the discharge of surface water to combined sewers is not permitted and the separation of stormwater from combined sewers is strongly recommended.</p> <p>Upgrades or extensions to the network shall be developer driven unless there are committed Uisce Éireann projects in place to progress such works.</p> <p>All new residential and commercial/industrial developments wishing to connect to an Uisce Éireann network are to be assessed on a case-by-case basis, through the Connections process. Third party agreement will be required where it is proposed to service a new development via private property or private water services infrastructure. For example, on some backland sites, housing estates with private water network e.g lands SW of Gort na Ri, and those adjoining Fern Hill and Abbeyglen Estates. Third Party permissions maybe required to connect largest tract of Residential Phase 2 lands.</p>	<p>Submission noted.</p> <p>Submission noted.</p>
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		<p>It is stated that a new sewer will be constructed as part of the ongoing sewer upgrade project on the L3112 as far as the junction with the L7154 road which will service future potential development in the area, subject to connection agreement.</p> <p><u>Wastewater Infrastructure</u></p> <ul style="list-style-type: none"> • Wastewater Treatment Plants (WWTPs) Athenry WWTP was upgraded in recent years to increase capacity and improve treatment performance. There is potential capacity available to cater for the projected growth targets, applications will be assessed on an individual basis considering their specific load requirements. • Wastewater Networks Uisce Éireann and Galway County Council are continually progressing sewer rehabilitation activities, capital maintenance activities, etc. Uisce Éireann and Galway County Council will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required. A network project to resolve capacity constraints, eliminate non-compliant combined sewer overflows recently commenced construction and will provide sufficient network capacity to cater for the targeted growth in the town. 	<p>Submission noted.</p> <p>Submission noted.</p> <p>Submission noted.</p>
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		<p>The upgraded sewer network will include sufficient capacity to facilitate the future connection of estates currently served by developer provided infrastructure (subject to connection agreement).</p> <p><u>Water Supply Infrastructure</u></p> <ul style="list-style-type: none"> • Water Supply Athenry is part of the Corrib Water Resource Zone (WRZ). A number of projects are underway within the WRZ to improve the level of service and security of supply, including upgrades at Luimnagh and Terryland treatment plants and the construction of a new intake at Terryland treatment plant. It is envisaged there is adequate capacity available to cater for the projected growth. • Water Networks Uisce Éireann and Galway County Council are continually progressing leakage reduction activities, mains rehabilitation activities and capital maintenance activities. Uisce Éireann and Galway County Council will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required. Approximately 500m of mains rehabilitation works were carried out in Athenry this year. • Other comments and suggestions: Section 1.7.3 DM Standard 2: SuDS: The discharge of additional surface water to combined (foul and surface water) sewers is not permitted 	<p>Submission noted.</p> <p>Submission noted.</p> <p>In relation to the specific comments referenced in the submission, the following is applicable:</p>
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		<p>....Current best practice guidance on SuDS is available from the Guidance Documents produced by the Greater Dublin Strategic Drainage Study (GSDS). Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Best Practice Interim Guidance Document.</p> <ul style="list-style-type: none"> • Extent of Phase 2 Lands: As per 1.7.2 of the Draft Plan, over 42ha has been zoned as Residential Phase 2. The need for this level of Phase 2 lands is unclear; a more focused approach would assist in long-term planning for future infrastructure needs. • 2.10 Water Supply and Wastewater Treatment Athenry is part of the Corrib Water Resource Zone (WRZ). A number of projects are underway within the WRZ to improve the Level of Service and security of supply, including upgrades at Luimnagh and Terryland treatment plants and the construction of a new intake at Terryland treatment plant. The Tuam Regional Water Supply Scheme (RWSS), provides water to Athenry RWSS. In 2021, a project to integrate two water treatment plants in Loughrea with the Tuam RWSS was significantly 	<p>Section 1.7.3 DM Standard 2: SuDS: The discharge of additional surface water to combined (foul and surface water) sewers is not permitted</p> <p>....Current best practice guidance on SuDS is available from the Guidance Documents produced by the Greater Dublin Strategic Drainage Study (GSDS). Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Best Practice Interim Guidance Document.</p> <ul style="list-style-type: none"> • Athenry is identified as a town of Strategic Potential in the RSES. In relation to Residential Phase 2 lands, it is considered prudent to identify a number of tranches of Residential Phase 2 lands. As outlined with policy objective ASP 5 Residential Development Phasing. There is a provision to examine these lands if Residential Phase 1 do not come to the market. Therefore, it is considered appropriate to include the lands as Residential Phase 2. • It is considered the wording as suggested is acceptable.
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		<p>finished.....Ultimately these works have resulted in the plant operating beyond capacity. A network project to resolve capacity constraints, eliminate non-compliant combined sewer overflows and improve water quality recently commenced construction and will provide sufficient network capacity to cater for the targeted growth in the town. Refer also to sections 2.2 and 2.3 above</p> <ul style="list-style-type: none"> • In relation to this Policy Objective ASP 68 Connection to the Public Sewers and Public Mains is not considered necessary as connection to public water and sewer networks are addressed in ASP 30. • Environmental Reports-The contents of this submission should be taken account of in the Environmental Reports. 	<ul style="list-style-type: none"> • Noted. It is considered that policy objective ASP68 is addressed with policy objective 30 and therefore should be deleted. • Submission noted. <p>Chief Executive’s Recommendation: Amend:</p> <ul style="list-style-type: none"> • Section 1.7.3 DM Standard 2: SuDS: The discharge of additional surface water to combined (foul and surface water) sewers is not permitted. <p>....Current best practice guidance on SuDS is available from the Guidance Documents produced by the Greater Dublin Strategic Drainage Study (GSDS). Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Best Practice Interim Guidance Document</p> <ul style="list-style-type: none"> • Water Supply and Wastewater Treatment Athenry is part of the Corrib Water Resource Zone (WRZ). A number of projects are underway within the WRZ to
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			<p>improve the Level of Service and security of supply, including upgrades at Luimnagh and Terryland treatment plants and the construction of a new intake at Terryland treatment plant. The Tuam Regional Water Supply Scheme(RWSS), provides water to Athenry RWSS. In 2021, a project to integrate two water treatment plants in Loughrea with the Tuam RWSS was significantly finished.....Ultimately these works have resulted in the plant operating beyond capacity. A network project to resolve capacity constraints, eliminate non-compliant combined sewer overflows and improve water quality recently commenced construction and will provide sufficient network capacity to cater for the targeted growth in the town.</p> <ul style="list-style-type: none"> • Delete Policy Objective ASP 68 <p>ASP 68 – Connections to the Public Sewer and Public Water Mains</p> <p>Where public wastewater services are available, new development proposals shall be required to connect to same.</p>
GLW-C60-27	Dept of Education	The submission refers to the population growth identified for Athenry in the GCDP 2022 - 2028. The Department refers to a previous submission made on the Draft GCDP 2022 - 2028. The Department notes that the population scenario envisaged for Athenry is 1,350 persons. It is stated that the projected population growth is sizeable.	<p>Chief Executive’s Response:</p> <p>The Council will continue to engage and collaborate with the Department of Education to accommodate additional school places on existing campus sites in accordance with proper planning and sustainable development. There is sufficient land zoned within the Draft Athenry LAP 2023 - 2029 to accommodate education facilities. Where possible lands have be zoned Community Facilities to</p>

		<p>There are 6 schools (three primary and three post-primary) located in Athenry town. The Department's preference would be to expand these existing facilities (if possible) should there be a requirement for additional school places as a result of the planned population increases. The Department requests the Planning Authority to examine the potential of protecting a land buffer around each of the primary schools to enable them to expand further if required to meet the future population growth in Athenry town. The schools in question are:</p> <ul style="list-style-type: none"> • Gaelscoil Riada(R/N 20237T) • Athenry Boys NS)R/N 17280D • Scoil Chroi Naofa(R/N 16071M) <p>The Department notes and welcomes that the Draft LAP acknowledges the significant investment from the Department in developing new and improved education facilities.</p> <p>The Department notes and acknowledges 1.1 Strategic Aims to provide a variety of facilities, amenities, and support services for range of users.</p> <p>The Department notes and supports section 1.7 Land Use Zones Community Facilities to provide for civic, community and educational facilities.</p>	<p>accommodate future school spaces and it is considered that there are sufficient lands to facilitate educational development.</p> <p>Chief Executive's Recommendation: No change.</p>
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		<p>The Department notes and acknowledges 2.9 Transportation and Movement-Local Transport Plan, the delivery of a safe, integrated walk and cycle network.</p> <p>The Department notes and supports Policy Objective ASP 15 Community Facilities and ASP 17 Educational; Facilities in Athenry.</p> <p>The Department supports the development of sustainable travel links between schools and residential areas. In terms of assessing current and future capacity, the Department of Education has to be mindful of potential unforeseen circumstances such as the Ukrainian crisis, which have the ability to put undue pressure on school place provision and could necessitate reassessments of school place provision from time to time. The Department will engage with the Council where the findings of an assessment require a review of existing or future school site provision within a specific location. The Department also anticipates that additional Special Education Needs provision at both Primary and Post Primary level will be required in the future throughout the country and this may result in schools requiring additional accommodation to meet this growing need. The Department will consult with the Council when additional SEN accommodation is required within specific locations.</p>	
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Dezoning Residential Phase 1 (Fern Hill)			
Submission No.	Submission Name	Summary of Issues Raised in Submission	Chief Executive's Response
GLW-C60-8	Paul Johnston	<p>This submission relates to the zoning of lands at Fern Hill estate. The submission objects to the zoning of Residential Phase 1 lands within the estate for several reasons:</p> <ul style="list-style-type: none"> • The road network cannot support the construction traffic; • Health and Safety of children. It is noted that the estate exit emerges onto a busy road with restrictive access. 	<p>Chief Executive's Response</p> <p>Submission noted. There are two land parcels zoned Residential Phase 1 in Fern Hill estate. In the preparation of the Draft Athenry LAP 2023 -2029, a full analysis of lands was carried out and it was considered appropriate to balance the location of the Residential Phase 1 lands within Athenry settlement boundary. Upon review and further analysis, the first Residential Phase 1 (1.67 ha.) land parcel is owned by Irish Rail and therefore the zoning as proposed is not appropriate. It is recommended this land parcel should be rezoned to Transport Infrastructure.</p> <p>In relation to the second land parcel (1.51ha.) and the submissions received, whilst the residual lands zoned would complete the existing housing estate there are concerns with accessing these lands for the development and construction purposes. It is noted that further works would be required to improve pedestrian connectivity, from the housing estate serving the R347. As a result of the above and submission received by the Office of Planning Regulator, it is therefore proposed to rezone this land parcel Residential Phase 2.</p> <p>Chief Executive's Recommendation</p> <p><i>See Chief Executives Recommendation to GLW-C60-101 in relation to Recommendation 1 of the OPR Submission.</i></p>

GLW-C60-9	Nathalie Holian	This submission relates to the zoning of lands at Fern Hill estate. It is contended that the zoning of these additional lands would contribute to medical concerns and a greater risk to public safety during the construction of the development of the estate. There are also concerns regarding the noise pollution and road safety concerns with the proposed works on these lands.	<p>Chief Executive's Response See Chief Executives Response to GLW-C60-8.</p> <p>Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C60-8</i></p>
GLW-C60-35	Aoife Lynch & Colin Ryan	<p>This submission relates to the zoning of lands at Fern Hill estate. A number of concerns has been raised as follows:</p> <ul style="list-style-type: none"> • The access point to the proposed lands is not a public road. There is a serious risk to the health and safety of children; • There is limited green space for children to play, which forces the children to use the road and footpath, and; • Construction traffic will have a negative impact of the well-being of the children in the estate and cause nuisance and annoyance to residents. 	<p>Chief Executive's Response See Chief Executives response to GLW-C60-8.</p> <p>Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C60-8</i></p>
GLW-C60-36	Pat Monaghan	This submission relates to the zoning of lands at Fern Hill estate. The submission is opposed to the zoning due to the potential effects on colonies of bats, birds, and biodiversity. It is suggested that the land should be zoned as a nature reserve.	<p>Chief Executive's Response See Chief Executives response to GLW-C60-8.</p> <p>Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C60-8</i></p>
GLW-C60-66	N Holian	<p>This submission relates to the zoning of lands at Fern Hill estate. Several concerns are outlined as follows:</p> <ul style="list-style-type: none"> • Fern Hill is not a public road. The estate road has many bends and children use the road daily to play; • The estate entrance does not have footpath access resulting in residents having to cross the road; 	<p>Chief Executive's Response See Chief Executives response to GLW-C60-8.</p> <p>Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C60-8</i></p>

		<ul style="list-style-type: none"> • The roads within the estate are not built to withstand heavy goods vehicles and will cause adverse effects on the road network, and; • The lower of the two Residential Phase 1 sites will require a wall to be removed. There are children located within the estate who have medical conditions. The submission requests a risk assessment to be carried out, and; • A colony of Bats reside in the newly zoned area. The submission requests for a bat survey to be carried out. 	
GLW-C60-78	Fern Hill & Stonehaven Residents	<p>This submission relates to the zoning of lands at Fern Hill estate. Several concerns are outlined as follows:</p> <ul style="list-style-type: none"> • The proposed access point is not a public road; • It is contended that there would be a serious risk to the health and safety of children; • There is limited green space for children to play, which forces the children to use the road and footpath and construction traffic will affect the well-being of the children in the estate; • The proposed development will cause nuisance and annoyance to residents, and; • No public footpath from the estate entrance to the public road, resulting in individuals crossing the Monivea Road to access the footpath. 	<p>Chief Executive’s Response See Chief Executives response to GLW-C60-8.</p> <p>Chief Executive’s Recommendation <i>See Chief Executives Recommendation to GLW-C60-8</i></p>
GLW-C60-106	Patricia Foley	<p>This submission relates to the zoning of lands at Fern Hill Stonehaven estate. Several points are raised as follows:</p> <ul style="list-style-type: none"> • Potential health and safety risk to the Stonehaven and Fern Hill residents. It is stated that Stonehaven was 	<p>Chief Executive’s Response See Chief Executives response to GLW-C60-8.</p> <p>Chief Executive’s Recommendation</p>

		<p>originally built as a small development. The width of pathways (1.2m) and access roadway (5.5m) are less than required by The Recommendation for Site Development Works for Housing Area (Department of the Environment and Local Government) for further residential development to be granted.</p> <ul style="list-style-type: none"> • Any additional residential zoning in Fern Hill and Stonehaven estate would endanger public safety as the footpaths would not be able to facilitate pedestrian, wheelchair access and pram movement. • It is contended that the footpath between Stonehaven and Fern Hill is not connected and access to the Monivea Road is limited with the absence of a connected footpath. 	<p><i>See Chief Executives Recommendation to GLW-C60-8</i></p>
GLW-C60-113	Ronan McCarthy (on behalf of Fern Hill and Stonehaven Residents)	<p>This submission relates to the zoning of lands at Fern Hill estate. Several points are raised as follows:</p> <ul style="list-style-type: none"> • The proposed access point is not a public road. It is contended that there is a serious risk to the health and safety of children; • It is stated that here is limited green space for children to play, which forces the children to use the road and footpaths; • Construction traffic will affect the well-being of the children in the estate; • The proposed development will cause nuisance and annoyance to residents, and; 	<p>Chief Executive’s Response See Chief Executives response to GLW-C60-8.</p> <p>Chief Executive’s Recommendation <i>See Chief Executives Recommendation to GLW-C60-8</i></p>

		<ul style="list-style-type: none"> No public footpath from the estate entrance to the public road, resulting in individuals crossing the Monivea Road to access the footpath. 	
GLW-C60-122	Nicola Condon Egan & Alan Egan	<p>This submission relates to the zoning of lands at Fern Hill estate. Several points are raised as follows:</p> <ul style="list-style-type: none"> Access to the newly zoned sites will cause a health and safety risk to the residents and their children; There is no adequate footpath or lighting in the estate. To access the footpath network, it is stated that individuals are required to cross the Monivea Road; Fears of anti-social behaviour, and; The Stonehaven and Fern Hill estate entrance has not been completed (images have been attached). The submission also outlined several other ongoing issues facing the residents. 	<p>Chief Executive's Response See Chief Executives response to GLW-C60-8.</p> <p>Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C60-8</i></p>
Dezoning Residential Phase 1 (Cullairbaun)			
GLW-C60-11	Simon Tear	<p>This submission relates to the zoning of land to Residential Phase 1 lands in the Cullairbaun estate. Several concerns have been raised as follows:</p> <ul style="list-style-type: none"> The omission of Open Space /Recreation and Amenity lands that were previously included in the 2012-2022 LAP. It is contended that this green space is an important amenity for the children. It is outlined that there are no recreational amenities north of the railway and queried why residential development has not been 	<p>Chief Executive's Response Submission Noted. In preparation for the Draft Athenry LAP 2023 - 2029, a full analysis of lands was undertaken. As outlined in the submission the lands were zoned Residential Phase 1 and Open Space/Recreation and Amenity in the 2012-2022 LAP. Having regard to the submission received and further analysis of the land it is deemed appropriate to retain the open green space north of the railway line. Therefore, it is considered appropriate to rezone a section of this land Open Space/Recreation and Amenity. It is noted the valuable asset that a designated green area has within this estate.</p>

		<p>considered where the recreational and education facilities are located;</p> <ul style="list-style-type: none"> • It is stated that the Cullairbaun estate has one entrance/exit with no speed ramps to reduce traffic speed; • It is contended that the road conditions are poor and will deteriorate further with additional construction traffic; • Health and safety issues are a huge concern for residents within the estate; • It is contended that anti-social behavior has previously been an issue in the estate, however, the residents have worked together to reduce anti-social behaviour and transform the area into a safe, friendly place for its residents. 	<p>Chief Executive’s Recommendation Rezone section from Residential Phase 1 to Open Space/Recreation and Amenity.</p> 
<p>GLW-C60-12</p>	<p>Mary Mannion</p>	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised several points as follows:</p> <ul style="list-style-type: none"> • The loss of the green space and its necessity for the residents; • It is stated that the road conditions within the estate are poor and will deteriorate further with additional traffic. It is contended that a second entrance is 	<p>Chief Executive’s Response See response to Chief Executives Response to GLW-C60-11.</p> <p>Chief Executive’s Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-11.</i></p>

		<p>required along with speed ramps to reduce traffic speed.</p> <ul style="list-style-type: none"> • It is stated that the playgrounds are in poor condition and are a health and safety risk. • It is outlined that Residents have worked together to maintain the communal green space and fear their work will be undone; • It is stated that the area has suffered from water and sewage issues recently and has acknowledged that improvement plans are underway but suggested alternative areas be zoned easing congestion and rising population on Tuam Road. 	
GLW-C60-13	Karen O Hara	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised several points as follows:</p> <ul style="list-style-type: none"> • It is stated that the Cullairbaun is the only estate with a green area, that is used by many individuals in Athenry for recreational activities; • It is contended that north of the Athenry railway line is becoming overpopulated and development should be focused to the south of the railway line where amenities are located; • It is stated that extensive work has been done by the residents and Athenry Tidy Towns to maintain the green space and outlined various tree types and rare flowers growing in this area; • It is outlined that the estate has only one entrance and exit and expressed concerns about construction and 	<p>Chief Executive’s Response See response to Chief Executives Response to GLW-C60-11.</p> <p>Chief Executive’s Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-11.</i></p>

		additional daily traffic, putting the health and safety of the children at risk.	
GLW-C60-15	Dominic Fallon	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised several points as follows:</p> <ul style="list-style-type: none"> • It is stated that the Cullairbaun estate is a mature estate with over seventy properties and only one access; • The construction traffic and increased volume of daily traffic once houses are occupied will be disrupted to the residents; • It is stated that extensive work has been done by the residents and Athenry Tidy Towns to maintain the green space and outlined various tree types and rare flowers growing in the area which encouraged people from other estates to use the green space. It is noted that several amenities are located south of the railway line; • The submission stipulates that zoning the open green space for residential development will negatively impact the health and well-being of the Cullairbaun residents but also those in the surrounding estates. 	<p>Chief Executive’s Response See response to Chief Executives Response to GLW-C60-11.</p> <p>Chief Executive’s Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-11.</i></p>
GLW-C60-16	Jonathan Ryan	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised several points as follows:</p> <ul style="list-style-type: none"> • It is contended that the green area is a safe space used daily by children, teenagers, and adults for various sports. It is stated that by removing this green space 	<p>Chief Executive’s Response See response to Chief Executives Response to GLW-C60-11.</p> <p>Chief Executive’s Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-11.</i></p>

		<p>will impact the current/future residents of the estate. It is outlined that by law every housing estate is entitled to 15% open space, and;</p> <ul style="list-style-type: none"> • It is stated that the northern area of Athenry is overpopulated and suffers significantly from traffic congestion. 	
GLW-C60-17	Barry Hynes	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised several points as follows:</p> <ul style="list-style-type: none"> • The green area is used by children and residents for recreational purposes, and; • Safety concerns for children in the estate throughout the construction process. 	<p>Chief Executive's Response See response to Chief Executives Response to GLW-C60-11.</p> <p>Chief Executive's Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-11.</i></p>
GLW-C60-19	Kieran Barrett	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised several points as follows:</p> <ul style="list-style-type: none"> • The green area is used by children in the area and is essential for the well-being of the community; • It is stated that the traffic entering the estate is excessive and new housing will increase this traffic; • Health and safety risks for residents; • The road infrastructure is in poor condition and with additional traffic will continue to get worse, and; • There is only one entrance for more than 70 houses, and it is stated that a second entrance is necessary 	<p>Chief Executive's Response See response to Chief Executives Response to GLW-C60-11.</p> <p>Chief Executive's Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-11.</i></p>
GLW-C60-22	B.Kelly and C.Flannery (on behalf of	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised several points as follows:</p>	<p>Chief Executive's Response See response to Chief Executives Response to GLW-C60-11.</p>

	Cullairbaun Residents)	<ul style="list-style-type: none"> The open space has been in use for over 50 years. The submission stated the green space is the only green space for young and old; It is requested that the subject lands are rezoned Open Space. 	<p>Chief Executive's Recommendation See response to Chief Executives Recommendation to GLW-C60-11.</p>
GLW-C60-23	Mary Cunniffe	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised several points as follows:</p> <ul style="list-style-type: none"> Cullairbaun Estate is the only council estate in Athenry which has a green area used by both non-residential and residential; It is contended that the town north of the railway is overpopulated and most of the amenities are located south of the railway; It is suggested that the rezoning should occur south of the railway. It is noted that the green area is used daily by children and is a safe distance from the main road; It is stated that the roads within the estate are busy as well as the busy Tuam Road from which the estate emerges; Concern is expressed in relation to the health and safety for the residents during the construction phase. 	<p>Chief Executive's Response See response to Chief Executives Response to GLW-C60-11.</p> <p>Chief Executive's Recommendation See response to Chief Executives Recommendation to GLW-C60-11.</p>
GLW-C60-24	James Cunniffe	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised several points as follows:</p> <ul style="list-style-type: none"> The green space is a safe area used by children daily; 	<p>Chief Executive's Response See response to Chief Executives Response to GLW-C60-11.</p> <p>Chief Executive's Recommendation See response to Chief Executives Recommendation to GLW-C60-11.</p>

		<ul style="list-style-type: none"> • The loss of this green space will have a significant impact and leave the residents in the estate without the 15% of open space to which they are entitled to; • Extensive work has gone to maintain the green area by the residents with the help of Athenry Tidy Town; • It is contended the area north of the railway is overpopulated and most of the amenities are located to the south; • It is stated that the estate has 70 dwellings with one entrance/exit and suggests the road infrastructure would not be able to cope with construction traffic; • Concern is expressed in relation to the health and safety for the residents during the construction phase. 	
GLW-C60-28	David and Malgorzata Kelly	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised several points as follows:</p> <ul style="list-style-type: none"> • Cullairbaun Estate is the only council estate in Athenry which has a green area used by both non-residential and residential; • It is contended that the town north of the railway is overpopulated and most of the amenities are located south of the railway; • It is suggested that the rezoning should occur south of the railway. It is noted that the green area is used daily by children and is a safe distance from the main road; • It is stated that the roads within the estate are busy as well as the busy Tuam Road from which the estate emerges; 	<p>Chief Executive's Response See response to Chief Executives Response to GLW-C60-11.</p> <p>Chief Executive's Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-11.</i></p>

		<ul style="list-style-type: none"> Concern is expressed in relation to the health and safety for the residents during the construction phase. 	
GLW-C60-30	Justyna Szymanska	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised several points as follows:</p> <ul style="list-style-type: none"> Overlooking and loss of privacy; Proposed development would affect view; Loss of property value; Concerns with height, overshadowing and reduction of natural light; Impact on the community during the construction process and; Damage to road infrastructure. 	<p>Chief Executive’s Response See response to Chief Executives Response to GLW-C60-11.</p> <p>Chief Executive’s Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-11.</i></p>
GLW-C60-31	Naomi Kelly	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised several points as follows:</p> <ul style="list-style-type: none"> The green space is used daily by children and many people across Atherry town. It is pointed out that the area was critically important during COVID-19 Pandemic and was a massive contributor to the health and welling being of the children in the estate; It is stated that a lot of work has gone into maintaining the green space by residents and Atherry Tidy Town; It is outlined that north of the railway line is overpopulated and development should be focused to the south of the railway where amenities are located; Concern is raised in relation to how the estate has only one entrance/exit and during the construction phase, 	<p>Chief Executive’s Response See response to Chief Executives Response to GLW-C60-11.</p> <p>Chief Executive’s Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-11.</i></p>

		the estate would be unsafe for residents and their children.	
GLW-C60-34	Jaclyn Glynn	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised several points as follows:</p> <ul style="list-style-type: none"> • The green space is used daily by children, playing away from the main road in the only safe place in the estate; • The submission raised concerns about the removal of the green area and the increased risk of accidents. • Concern is raised in relation to how the estate has only one entrance/exit and during the construction phase and on a daily basis the estate would be unsafe for residents and their children. 	<p>Chief Executive’s Response See response to Chief Executives Response to GLW-C60-11.</p> <p>Chief Executive’s Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-11.</i></p>
GLW-C60-41	Eoin Mc Donagh	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised several points as follows:</p> <ul style="list-style-type: none"> • The green area is used by children with special needs; • It is considered that no proper consultation with residents took place; • No alternative plots/play areas have been considered; • The area is used by all residents in Athenry; • The area is used daily by children and teenagers, and; • Additional housing will add to existing traffic issues. 	<p>Chief Executive’s Response See response to Chief Executives Response to GLW-C60-11.</p> <p>Chief Executive’s Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-11.</i></p>
GLW-C60-42	Jacek Szymanski	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised several points as follows:</p> <ul style="list-style-type: none"> • Overlooking and loss of privacy; 	<p>Chief Executive’s Response See response Chief Executives Response to GLW-C60-11.</p> <p>Chief Executive’s Recommendation</p>

		<ul style="list-style-type: none"> • Proposed development would affect view; • Loss of property value; • Concerns with height, overshadowing and reduction of natural light; • Impact on the community during the construction process and; • Damage to road infrastructure. 	<p><i>See response to Chief Executives Recommendation to GLW-C60-11.</i></p>
GLW-C60-43	Michael Flannery	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised several points as follows:</p> <ul style="list-style-type: none"> • It is stated that children of the estate have played safely in the area for over 40 years; • It is contended that the estate has 70 dwellings with one entrance/exit and outlined that the road infrastructure would not be able to cope with construction traffic and additional daily traffic; • It is outlined that the green area has been looked after by residents with the help of Athenry Tidy Towns; • It is considered that adding more dwellings will have a long-term impact, leaving no safe area for children to play, leading to anti-social behaviour. 	<p>Chief Executive’s Response See response to Chief Executives Response to GLW-C60-11.</p> <p>Chief Executive’s Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-11.</i></p>
GLW-C60-46	Joanne Cullen	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised several points as follows:</p> <ul style="list-style-type: none"> • It is contended that the estate has 70 dwellings with one entrance/exit and outlined that the road infrastructure would not be able to cope with construction traffic and additional daily traffic; 	<p>Chief Executive’s Response See response to Chief Executives Response to GLW-C60-11.</p> <p>Chief Executive’s Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-11.</i></p>

		<ul style="list-style-type: none"> • It is outlined that there are significant health benefits for the outdoor space; • It is outlined that north of the railway line is overpopulated and development should be focused to the south of the railway where amenities are located; • Further pressure to the dangerous junctions on the Tuam Road. 	
GLW-C60-49	Elaine Cunniffe	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised several points as follows:</p> <ul style="list-style-type: none"> • Extensive work has gone to maintain the green area by the residents with the help of Athenry Tidy Town; • The green space is a safe area used by children daily; • The loss of this green space will have a significant impact and leave the residents in the estate without the 15% of open space to which they are entitled to; • It is contended the area north of the railway is overpopulated and most of the amenities are located to the south; • Concern is raised in relation to how the estate has only one entrance/exit and during the construction phase and on a daily basis the estate would be unsafe for residents and their children. • Concern is expressed in relation to the health and safety for the residents during the construction phase. 	<p>Chief Executive’s Response See response to Chief Executives Response to GLW-C60-11.</p> <p>Chief Executive’s Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-11.</i></p>
GLW-C60-59	Breda Kelly	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised several points as follows:</p>	<p>Chief Executive’s Response See response to Chief Executives Response to GLW-C60-11.</p>

		<ul style="list-style-type: none"> • It is stated that a lot of work has gone into maintaining the green space by residents and Athenry Tidy Town; • The green space is used daily by children as a safe place to play; • It is stated that the long term impact on the residents needs to be considered. 	<p>Chief Executive's Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-11.</i></p>
GLW-C60-60	Jessica Tear	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised several points as follows:</p> <ul style="list-style-type: none"> • It is stated that that green area is a significant asset for the residents and surrounding estates, and; • Concerns are raised in relation to noise pollution and that the road infrastructure not being able to withstand pressures during the construction phase. 	<p>Chief Executive's Response <i>See response to Chief Executives Response to GLW-C60-11.</i></p> <p>Chief Executive's Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-11.</i></p>
GLW-C60-61	Elaine Connolly	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised several points as follows:</p> <ul style="list-style-type: none"> • It is stated that that green area is a significant asset for the residents and surrounding estates; • It is outlined that the roads are in poor condition; • It is stated that the estate has only one entrance/exit and outlined that the road infrastructure would not be able to cope with construction traffic and additional daily traffic; • Concern is expressed in relation to the health and safety for the residents, and; • This area is the only area of open space in Athenry. 	<p>Chief Executive's Response <i>See response to Chief Executives Response to GLW-C60-11.</i></p> <p>Chief Executive's Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-11.</i></p>

GLW-C60-62	Martin Cullen	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised several points as follows:</p> <ul style="list-style-type: none"> • Concern is expressed in relation to the health and safety for the residents; • It is stated that the road infrastructure is in poor condition would not be able to cope with construction traffic and additional daily traffic, and; • It is outlined that north of the railway line is overpopulated and development should be focused to the south of the railway where amenities are located. 	<p>Chief Executive’s Response See response to Chief Executives Response to GLW-C60-11.</p> <p>Chief Executive’s Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-11.</i></p>
GLW-C60-63	Jimmy Connolly	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised several points as follows:</p> <ul style="list-style-type: none"> • It is stated that no prior notification was given or open meeting held; • It is outlined that there are small committee which maintains the estate and green space, enabling a safe recreational area for the children and grandchildren to play in the estate; • Concern is expressed in relation to new housing developments erected north of the Tuam Road, where the road infrastructure (entrance & exit of estates) cannot withstand another major housing development. 	<p>Chief Executive’s Response See response to Chief Executives Response to GLW-C60-11.</p> <p>Chief Executive’s Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-11.</i></p>
GLW-C60-65	Eileen Caulfield	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised several points as follows:</p>	<p>Chief Executive’s Response See response to Chief Executives Response to GLW-C60-11.</p> <p>Chief Executive’s Recommendation</p>

		<ul style="list-style-type: none"> • The green space is used daily by children as a safe place to play; • The rezoning results in the loss of the only recreational area in Athenry, and; • It is stated that the estate has only one entrance/exit and outlined that the road infrastructure would not be able to cope with construction traffic and additional daily traffic. 	<i>See response to Chief Executives Recommendation to GLW-C60-11.</i>
GLW-C60-67	Anna Zukower	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised several points as follows:</p> <ul style="list-style-type: none"> • Overlooking and loss of privacy; • Proposed development would affect view; • Loss of property value; • Concerns with height, overshadowing and reduction of natural light; • Impact on the community during the construction process, and; • Damage to road infrastructure. 	<p>Chief Executive's Response See response to Chief Executives Response to GLW-C60-11.</p> <p>Chief Executive's Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-11.</i></p>
GLW-C60-109	Louise Devine	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised the follows:</p> <ul style="list-style-type: none"> • It is stated that there are enough houses constructed in the estate and the green space is used daily by children. 	<p>Chief Executive's Response See response to Chief Executives Response to GLW-C60-11.</p> <p>Chief Executive's Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-11.</i></p>
GLW-C60-126	Grace Cullen	<p>This submission relates to the zoning of land in Cullairbaun estate. The submission is opposed to the new zoning of residential lands and has raised the follows:</p>	<p>Chief Executive's Response See response to Chief Executives Response to GLW-C60-11.</p>

		<ul style="list-style-type: none"> • It is stated that the green space is used daily by children daily, and; • Concern is expressed regarding the noise and safety of the roads during the construction phase. 	<p>Chief Executive’s Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-11.</i></p>
Dezoning Residential Phase 1 (Abbey Glen)			
GLW-C60-48	Caitriona Griffin	<p>This submission relates to an area of land to the rear of Abbey Glenn Estate. The submission is opposed to the new zoning of residential lands and has raised several points as follows:</p> <ul style="list-style-type: none"> • It is requested that the lands zoned Residential Phase 1 in the Draft Athenry LAP 2023 – 2029 would be rezoned to Open Space/Recreation and Amenity as the area is known to flood regularly; • Several photos have been included illustrating the extent of the flooding in the Residential Phase 1 area; • It is requested that if the lands are zoned “Open Space” they should be used for sports pitches. The submission noted a separate entrance should be incorporated into the plans as the road into Abbey Glen cannot facilitate large volumes of traffic to access the space. 	<p>Chief Executive’s Response</p> <p>Submission Noted. As part of the preparation of the Draft Athenry LAP 2023 – 2029 a Stage 2 Flood Risk Assessment was prepared which was placed on public display with all documents relating to the plan. The Stage 2 Flood Risk Assessment did not identify the subject lands in Flood Zone A and or B. In addition, the Office of Public Works did not identify these lands at risk from fluvial flooding.</p> <p>In the extant Athenry LAP 2012 - 2022, there was a greater area of lands zoned Residential which extended to the rear of the residential units at Abbey Glen. As outlined above a Stage 2 Flood Risk Assessment accompanied the Draft Athenry LAP 2023 – 2029 which identified the land to the rear of the Abbey Glen estate at risk of fluvial flooding and accordingly this area was zoned Open Space/Recreation and Amenity.</p> <p>Upon receiving the submission on the Draft Athenry LAP 2023 - 2029, a further analysis of this area was undertaken, with an examination of LIDAR data, future scenario flood mapping and another site visit on the 11th of August 2023. It was noted that during the course of this inspection that the lands subject to the Residential Phase 1 zoning is on</p>

			<p>higher ground and the drainage and visual appearance of these lands would suggest that the flooding issues at this location are pluvial. It is noted the concerns raised in the submissions regarding the potential of these lands to flood, but it is considered from a plan making purpose that the lands can be zoned Residential Phase 1 in accordance with <i>The Planning System and Flood Risk Management (2009)</i> guidelines.</p> <p>Chief Executive’s Recommendation No Change</p>
GLW-C60-50	Conor Hurley	<p>This submission relates to an area of land to the rear of Abbey Glenn Estate. The submission is opposed to the zoning of a parcel of Residential Phase 1 and has raised several points as follows:</p> <ul style="list-style-type: none"> • It is requested that the Open Space/Recreation and Amenity lands would be extended into the lands that are zoned Residential Phase 1 in the Draft Athenry LAP 2023 – 2029; • It is contended that this would protect several dwellings in the estate from flooding. Several photos and map illustrating the flooding in the estate. 	<p>Chief Executive’s Response See response to Chief Executives Response to GLW-C60-48.</p> <p>Chief Executive’s Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-48.</i></p>
GLW-C60-74	Peter Sullivan	<p>This submission relates to an area of land to the rear of Abbey Glenn Estate. The submission is opposed to the zoning of a parcel of Residential Phase 1 and has raised several points as follows:</p>	<p>Chief Executive’s Response See response to Chief Executives Response to GLW-C60-48.</p> <p>Chief Executive’s Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-48.</i></p>

		<ul style="list-style-type: none"> • The lands zoned Residential Phase 1 are subject to persistent flooding and should be zoned Open Space/Recreation and Amenity; • Reference to a current planning and layouts is made. Queries the two access routes illustrated on the drawings to access “future” Community Facilities and Agriculture lands; • Due to the close location to the historic town of Athenry, it is requested that the area is preserved until a full Archaeological Impact Assessment can be conducted; • Two maps and photos illustrating the persistent flooding in the subject area. 	
GLW-C60-121	Kevin Mc Coy	This submission relates to an area of land to the rear of Abbey Glen Estate. There is broad agreement in relation to the lands that have been zoned Open Space/Recreation and Amenity to the rear of Abbey Glen. It is queried as to why this zoning did not extend to the section of Residential Phase 1 lands as it is stated that this area is also liable to flooding. Several photos have been submitted.	<p>Chief Executive’s Response See response to Chief Executives Response to GLW-C60-48.</p> <p>Chief Executive’s Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-48.</i></p>
GLW-C60-105	Sharon Crowe	This submission relates to an area of land to the rear of Abbey Glenn Estate. The submission is opposed to the zoning of a parcel of Residential Phase 1 and has raised several points as follows: <ul style="list-style-type: none"> • It is requested that these lands would be rezoned to Open Space/Recreation and Amenity or Community Facilities; 	<p>Chief Executive’s Response See response to Chief Executives Response to GLW-C60-48.</p> <p>Chief Executive’s Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-48.</i></p>

		<ul style="list-style-type: none">• It is contended that this area floods regularly after a period of heavy rainfall;• Concern regarding access arrangements are also raised through the Abbey Glen Estate;• It is stated that development of subject lands will negatively impact the properties;• The planning history of the lands adjacent is outlined;• If development proceeds on the lands the level of the area would be raised, it is stated that this would result in the movement of flood water into both gardens and houses within the estate;• It is suggested that the Environmental Protection Agency would be engaged to carry out an Environmental Impact Assessment;• The proposed development will cause overshadowing, thus reducing the value of existing Abbey Glen properties;• It is considered that there would be an impact on existing Sewerage System in Abbey Glen;• Health and safety concerns are raised with additional traffic;• Entrance and exit are narrow emerging onto the R347, and;• The development will affect the resident's quality of life.	
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Residential Phase 1			
GLW-C60-77	MKO (on behalf of Kiera Hanney)	<p>A comprehensive submission has been received in relation to lands at Cullairbaun, Athenry. It is requested that the lands would be rezoned from Agriculture to Residential Phase 1, several points have been raised:</p> <ul style="list-style-type: none"> • High level policy context and review of the 2016 Census and 2022 Census. It is outlined that the 2016 Census is now out of date with a population increase of 5,765 people. It is noted that ultimately the predicted growth rate up to 2029 has already been met and queried should the 2016 figures remain in the Draft Athenry LAP; • It is stated that the plan fails to provide adequate zoning and planning for residential development within its lifetime and how it is a missed opportunity to guide the development of Athenry in a planned and controlled way, stipulating the Draft Athenry LAP is likely out of alignment with its housing targets. • It is stated that there will be a significant shortfall in housing supply versus demand and downzoning of lands in Athenry from residential will create significant problems in providing lands for housing development; • It is requested that the core strategy projections are revised to align with changing housing demand to support positive growth and development in Athenry; • A rationale for the rezoning request has been outlined. It is outlined that the lands are located within close 	<p>Chief Executive's Response</p> <p>Submission Noted. Reference to the 2016 and 2022 Census population figures are noted. The core strategy allocation for Athenry was adopted in the GCDP 2022-2028 which came into effect in June 2022. It is acknowledged that the preliminary figures for the Census 2022 have been released however there is no provision to immediately increase the population allocation for towns such as Athenry. This mechanism would be considered under the GCDP 2022 - 2028. It is considered that a more complete picture in relation to Census results/movement in and out of towns will become clearer in the next number of months.</p> <p>There are lands identified as Residential Phase 1 within Athenry and these are green field sites. As part of the midterm review of the GCDP 2022-2028 a clearer analysis will become apparent which may warrant a revised core strategy allocation for towns and villages. If this is the case additional lands in Athenry will be examined.</p> <p>As per the <i>OPR Recommendation 1</i> a review of Residential Phase 1 lands occurred, and it was considered that a reallocation of two parcels of lands would occur. The reallocation of these lands has been partially allocated to the subject lands pertaining to this submission on the basis of connectivity and accessibility to the town centre. The</p>

		<p>proximity to educational facilities, local amenities, and connectivity to the town centre;</p> <ul style="list-style-type: none"> Reference to the presence of the Esker is made and the Policy Objective ASP 63 Biodiversity and Ecological Networks. It is outlined that the policy objective does permit development to be undertaken on the site and future applications will recognise this policy objective to ensure that the environmental and ecological considerations associated with the Esker are respected appropriately. 	<p>zoning of these lands is still within the core strategy allocation of 21.8 ha.</p> <p>Chief Executive’s Recommendation <i>See Chief Executives Recommendation to GLW-C60-101 in relation to Recommendation 1 of the OPR Submission.</i></p>
<p>GLW-C60-99</p>	<p>MKO on behalf of Highgate Ltd.)</p>	<p>A comprehensive submission has been received in relation to lands at Cullairbaun, Athenry. It is requested that the lands would be rezoned from Agriculture to Residential Phase 1</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> High level policy context and review of the household figures and 2016 Census and 2022 Census. It is outlined that the 2016 Census is now out of date with a population increase of 5,765 people. It is noted that ultimately the predicted growth rate up to 2029 has already been met and queried should the 2016 figures remain in the Draft Athenry LAP; It is stated that the plan fails to provide adequate zoning and planning for residential development within its lifetime and how it is a missed opportunity to guide the development of Athenry in a planned and controlled way, stipulating the Draft Athenry LAP is likely out of alignment with its housing targets; 	<p>Chief Executive’s Response Submission Noted. This submission relates to the same parcel of lands identified in submission GLW-C60-77.</p> <p>Chief Executive’s Recommendation <i>See Chief Executives Recommendation to GLW-C60-77</i></p>

		<ul style="list-style-type: none"> • It is stated that the lands are serviced and that they are in close proximity to amenities to support the development of these lands; • The zoning of these lands to Agriculture in the Draft Athenry LAP 2023 – 2029 would result in a significant shortfall in housing supply versus demand; • It is requested that the core strategy projections are revised to align with changing housing demand to support positive growth and development in Athenry; • A rationale for the rezoning request has been outlined. It is outlined that the lands are located within close proximity to educational facilities, local amenities, and connectivity to the town centre; • Reference to the presence of the Esker is made and the Policy Objective ASP 63 Biodiversity and Ecological Networks. It is outlined that the policy objective does permit development to be undertaken on the site and future applications will recognise this policy objective to ensure that the environmental and ecological considerations associated with the Esker are respected appropriately. 	
GLW-C60-37	Eamon Madden	<p>The submission relates to two parcels of land at Ballygurrane South (Parcel A) and Gorteenacra (Parcel B1 and B2).</p> <p>The following zoning change is requested:</p> <ul style="list-style-type: none"> • Parcel B2 (1.69ha) from Residential Phase 1 to Tourism and; 	<p>Chief Executive’s Response</p> <p>Submission Noted. It is considered that the lands subject to Parcel B2 as per the Draft Athenry LAP 2023 – 2029 is appropriate with a mix of Residential Phase 1 and Tourism lands to the rear. The zoning of these lands as Residential Phase 1 lands is considered justified at this location, due to accessibility and connectivity with the town centre. It is</p>

		<ul style="list-style-type: none"> Parcel A (1.05ha) from Residential Phase 2 to Residential Phase 1. <p>The submission outlined a justification to rezone Parcel A, retaining the status quo from the Athenry LAP 2012 – 2022.</p>	<p>considered that the Residential Phase 1 lands would complement the Tourism lands to the rear.</p> <p>The lands identified in Parcel A do not have the same pedestrian connectivity as lands identified in Parcel B2 and therefore the zoning of Residential Phase 2 lands should remain in this instance.</p> <p>Chief Executive’s Recommendation No Change</p>
GLW-C60-79	MKO (on behalf of Bellerin 3A Limited)	<p>A comprehensive submission has been received in relation to lands at Prospect, Athenry. It is requested that lands would be rezoned from Residential Phase 2 and Agriculture to Residential Phase 1 in their entirety as in the extant Athenry LAP 2012- 2022</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> High level policy context and review of the 2016 Census and 2022 Census. It is outlined that the 2016 Census is now out of date with a population increase of 5,765 people. It is noted that ultimately the predicted growth rate up to 2029 has already been met and queried should the 2016 figures remain in the Draft Athenry LAP; It is stated that the plan fails to provide adequate zoning and planning for residential development within its lifetime and how it is a missed opportunity to guide the development of Athenry in a planned and controlled way, stipulating the Draft Athenry LAP is likely out of alignment with its housing targets: 	<p>Chief Executive’s Response</p> <p>Submission noted. The Draft Athenry LAP 2023 – 2029 was prepared in accordance with the core strategy of the GCDP 2022-2028. As part of the review of the Athenry LAP 2023 – 2029 the quantum of Residential Phase 1 lands were examined. There is a requirement of 21.8 hectares of Residential Phase 1 lands. The Planning Authority has zoned accordingly. It is considered that the subject lands have several constraints, especially concerning pedestrian connectivity and accessibility to the town. Notwithstanding the proposals outlined in the submission to improve connectivity, it is considered these measures are a medium term and therefore, it is considered that zoning of Residential Phase 2 is considered appropriate in this instance.</p> <p>Chief Executive’s Recommendation No Change</p>

		<ul style="list-style-type: none"> • It is referenced that the lands are located adjacent to services, amenities and supporting infrastructure which are all are conducive to population growth and sustainable development; • A detailed rationale (Infrastructure & Facilities, Physical Suitability and Sequential Approach) for the rezoning and referred to the extensive planning history on the site; • Reference to a live planning application for 72no. residential units and construction of footpaths which will improve the connectivity of the site and surrounding areas of Athenry. 	
GLW-C60-38	Mary Rabbitte	<p>The submission relates to lands at Newford, Athenry. It is requested that lands would be rezoned from Agriculture to Residential Phase 1.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • Small infill site inside Athenry Ring Road; • Access onto old Athenry/Galway Road, inside the 50kmph speed limit; • Proximity to sewers which are under construction at present; • Located 100m from Dexcom site with footpath access; • Strong demand for housing in Athenry and; • Pedestrian access between site and town to be improved. 	<p>Chief Executive’s Response</p> <p>Submission Noted. It is considered that the subject lands are a residual area of land and as such is not appropriate for Residential Phase 1 lands. The lands are immediately adjacent to the R348 link road and roundabouts. The access to these lands would appear to be from the L-3123-0 which is currently deficient in terms of pedestrian connectivity to the town. The location of these lands adjacent to the R348 would result in poor residential amenity for future occupiers of these lands.</p> <p>As part of the review of the Athenry LAP 2023 – 2029 the quantum of Residential Phase 1 lands was examined. There is a requirement of 21.8 hectares of Residential Phase 1 lands. The Planning Authority has zoned accordingly.</p> <p>Chief Executive’s Recommendation</p> <p>No Change</p>

<p>GLW-C60-114</p>	<p>A Marten (on behalf of Coffey Group)</p>	<p>A comprehensive submission was received in relation to lands at Parklands, Caheroyn, Athenry. It is requested that the lands would be rezoned from Residential Phase 2 to Residential Phase 1.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • High level policy context, location and planning history of the subject lands was outlined; • It is stated that the lands are largely undeveloped and surrounded on three sides by existing housing developments including adjoining Parklands estate built as the first phase of a larger residential development; • The strategic location of Athenry was outlined and location adjacent to the rail infrastructure; • Reference to the GCDP 2022 – 2028 core strategy and how it has been embedded in the Athenry LAP. It is stated that there is potential for population growth to exceed the targets set out in national, regional, and local planning policy; • It is requested that the core strategy and housing allocation would be reviewed and increased to reflect the expected growth in population; • A rationale for the rezoning of these lands has been outlined with the referencing of sequential development, close proximity to a large variety of community facilities, amenities and services located near the subject site; 	<p>Chief Executive’s Response</p> <p>Submission noted. The Draft Athenry LAP 2023 – 2029 was prepared in accordance with the core strategy of the GCDP 2022 – 2028. As part of the review of the Athenry LAP 2023 – 2029 the quantum of Residential Phase 1 lands were examined. There is a requirement of 21.8 hectares of Residential Phase 1 lands. The Planning Authority has zoned accordingly. In relation to these Residential Phase 2 lands and in light of the comments from the Office of Planning Regulator under Recommendation 1, it is considered that an Urban Framework Plan would be prepared for a large tract of Residential Phase 2 lands within this area (see Map Attached as Appendix B). It is a priority of the Planning Authority to prepare a Urban Framework Plan within the lifetime of the LAP.</p> <p>It is acknowledged that the preliminary figures for the Census 2022 have been released however, there is no provision immediately to increase the population allocation for towns such as Athenry. This mechanism would have to be commenced under the GCDP 2022 - 2028.</p> <p>There are lands identified as Residential Phase 1 within Athenry and these are green field sites. As part of the midterm review of the GCDP 2022 – 2028 a clearer analysis will become apparent which may warrant a revised core strategy allocation for towns and villages. In addition, the Urban Framework Plan will allow a more detailed analysis of the lands, which would include infrastructural requirements and improved pedestrian connectivity from</p>
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	<ul style="list-style-type: none"> • Reference to the access arrangements and connectivity have also been made; • The subject lands are located within the area outlined by Policy Objective ASP 6 Access Arrangements on Residential Phase 2 Lands. Reference to the Draft Athenry LAP and LTP which aims to improve dedicated cycle and pedestrian corridors to connect the subject lands and the R347 (Tuam Road); • A Traffic Impact Assessment (TIA) Report and Compliance Statement with the Design Manual for Urban Roads and Streets have been submitted as part of the submission (attached as Appendix 1). Proposals in relation to construction phase, access arrangements have also been made. A mobility Management Plan within the subject lands is referenced. The submission also states all necessary infrastructural connections can be provided to the subject lands via the Caislean Oir estate and the existing on-site mains at the Parklands estate; • It is contended that a desktop review indicates that the subject lands are not subject to any environmental, ecological, archaeological, hydrological, or flooding constraints or designations. • It is stated that the lands are relatively flat and are generally considered suitable for residential development; • A site layout and design for the proposed Parklands Residential Development has been submitted and 	<p>the northern side of the railway within the town. Therefore, it is considered because of the subject lands should remain Residential Phase 2.</p> <p>See response to Chief Executives Response GLW-C60-101 above.</p> <p>Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C60-101 in relation to Recommendation 1 of the OPR Submission.</i></p>
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		<p>illustrates a high-quality, contextually sensitive design in accordance with the relevant design-related policy objectives and guidelines;</p> <ul style="list-style-type: none"> • An extract from the site layout plan for the proposed development has been submitted and indicates the proposed site access and arrangement of residential sites and units and public and private open spaces. 	
GLW-C60-53	Grady Architects (on behalf of Roonith Properties)	<p>A comprehensive submission was received in relation to lands at Ballydavid South, Athenry. It is requested that the lands would be rezoned from Residential Phase 2 to Residential Phase 1.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • It is considered that the lands in question would be an extension of the existing Garraí Glas Estate (Phase two) of which is substantially complete; • It stated that a public Amenity Park for Athenry has been constructed in conjunction with Phase two of Garraí Glas Estate along with the Phase one creche facility; • It is outlined that the adjoining lands contain a large wastewater pipeline from Garraí Glas Estate (Phase Two) to the Uisce Éireann mains which have been installed by Roonith Properties; • Two maps have been included illustrating access, connectivity, phasing and overall masterplan of the site. 	<p>Chief Executive’s Response</p> <p>Submission noted. The Draft Athenry LAP 2023 – 2029 was prepared in accordance with the core strategy of the GCDP 2022 – 2028. As part of the review of the Athenry LAP 2023 – 2029 the quantum of Residential Phase 1 lands were examined. There is a requirement of 21.8 hectares of Residential Phase 1 lands. The Planning Authority has zoned accordingly. In relation to these Residential Phase 2 lands and in light of the comments from the Office of Planning Regulator under Recommendation 1, it is considered that an Urban Framework Plan would be prepared for a large tract of Residential Phase 2 lands within this area (see Map Attached as Appendix B). It is a priority of the Planning Authority to prepare a Urban Framework Plan within the lifetime of the LAP.</p> <p>The Urban Framework Plan will allow a more detailed analysis of the lands, which would include infrastructural requirements and improved pedestrian connectivity from the northern side of the railway within the town. Therefore, it is considered because of the above reasons the subject lands should remain Residential Phase 2.</p>

		<p>A justification for the rezoning request has been included;</p> <ul style="list-style-type: none"> • Lands are fully serviced; • Acute shortage of serviced Residential Phase 1 lands; • 4-acre Public Amenity Park; • Historically lands have been zoned Residential Phase 2 and there is a precedent for Residential zoning on the subject lands, and; • Access via the Athenry Northern Relief Road 	<p>See response to Chief Executives Response GLW-C60-101 above.</p> <p>Chief Executive’s Recommendation <i>See Chief Executives Recommendation to GLW-C60-101 in relation to Recommendation 1 of the OPR Submission.</i></p>
GLW-C60-81	MKO (on behalf of Caheroyn MB Developments Ltd.)	<p>A comprehensive submission was received in relation to lands at Prospect, Athenry. It is requested that the lands would be rezoned from Residential Phase 2 to Residential Phase 1.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • High level policy context and review of the 2016 Census and 2022 Census. It is outlined that the 2016 Census is now out of date with a population increase of 5,765 people. It is noted that ultimately the predicted growth rate up to 2029 has already been met and queried should the 2016 figures remain in the Draft Athenry LAP; • It is stated that the plan fails to provide adequate zoning and planning for residential development within its lifetime and that this will restrict the development potential of Athenry. It is requested that the population projections are revised and how it is a missed opportunity to guide the development of Athenry in a planned and controlled way, stipulating the Draft 	<p>Chief Executive’s Response Submission noted. The Draft Athenry LAP 2023 – 2029 was prepared in accordance with the core strategy of the GCDP 2022 – 2028. As part of the review of the Athenry LAP 2023 – 2029 the quantum of Residential Phase 1 lands were examined. There is a requirement of 21.8 hectares of Residential Phase 1 lands.</p> <p>The Planning Authority has zoned accordingly. In relation to these Residential Phase 2 lands and in light of the comments from the Office of Planning Regulator under Recommendation 1, it is considered that an Urban Framework Plan would be prepared for a large tract of Residential Phase 2 lands within this area (see Map Attached as Appendix B). It is a priority of the Planning Authority to prepare a Urban Framework Plan within the lifetime of the LAP.</p> <p>The Urban Framework Plan will allow a more detailed analysis of the lands, which would include infrastructural requirements and improved pedestrian connectivity from</p>

		<p>Athenry LAP is likely out of alignment with its housing targets;</p> <ul style="list-style-type: none"> • It is referenced that the lands are located adjacent to services, amenities and supporting infrastructure which are all conducive to population growth and sustainable development; • The planning history of the lands has been outlined. 	<p>the northern side of the railway within the town. Therefore, it is considered because of the above reasons the subject lands should remain Residential Phase 2.</p> <p>See response to Chief Executives Response GLW-C60-101 above.</p> <p>Chief Executive’s Recommendation <i>See Chief Executives Recommendation to GLW-C60-101 in relation to Recommendation 1 of the OPR Submission.</i></p>
<p>GLW-C60-82</p>	<p>MKO (on behalf of Joe Hoade)</p>	<p>A comprehensive submission was received in relation to lands at Carrowntober West, Athenry Prospect, Athenry. It is requested that the lands would be rezoned from Agriculture and Open Space/Recreational Amenity to Residential Phase 1.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • High level policy and spatial context has been outlined; • The strategic potential of Athenry has been outlined. Reference to the 2016 Census and 2022 Census. It is outlined that the 2016 Census is now out of date with a population increase of 5,765 people. It is noted that ultimately the predicted growth rate up to 2029 has already been met and queried should the 2016 figures remain in the Draft Athenry LAP; • It is referenced that the residential requirements for Athenry are based upon 2016 figures resulting in a significant shortfall in housing supply versus demand and downzoning of lands from residential will create 	<p>Chief Executive’s Response Submission noted. The Draft Athenry LAP 2023 – 2029 was prepared in accordance with the core strategy of the GCDP 2022 – 2028. As part of the review of the Athenry LAP 2023 – 2029 the quantum of Residential Phase 1 lands were examined. There is a requirement of 21.8 hectares of Residential Phase 1 lands. The Planning Authority has zoned accordingly.</p> <p>The subject lands are removed and located on the extremity of the settlement boundary and as such would not contribute to sequential residential development. Therefore, it is considered that the lands should remain Agriculture and Open Space/Recreational Amenity.</p> <p>Chief Executive’s Recommendation No Change</p>

		<p>significant problems in providing land for housing development to meet growing population needs. The submission states it is, therefore, crucial the core strategy projections are revised to align with changing housing demand to support positive growth and development in Athenry.</p>	
GLW-C60-83	MKO (on behalf of Coffey Off-Site Ltd.)	<p>A comprehensive submission was received in relation to lands at Ballydavid, Athenry. It is requested that the lands would be rezoned from Industrial to Residential Phase 1.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • High level policy context and review of the 2016 Census and 2022 Census. It is outlined that the 2016 Census is now out of date with a population increase of 5,765 people. It is noted that ultimately the predicted growth rate up to 2029 has already been met and queried should the 2016 figures remain in the Draft Athenry LAP; • It is stated that the plan fails to provide adequate zoning and planning for residential development within its lifetime and that this will restrict the development potential of Athenry. It is requested that the population projections are revised and how it is a missed opportunity to guide the development of Athenry in a planned and controlled way, stipulating the Draft Athenry LAP is likely out of alignment with its housing targets; • It is referenced that the lands are located adjacent to services, amenities and supporting infrastructure 	<p>Chief Executive’s Response</p> <p>Submission noted. The Draft Athenry LAP 2023 – 2029 was prepared in accordance with the core strategy of the GCDP 2022 – 2028. As part of the review of the Athenry LAP 2023 – 2029 the quantum of Residential Phase 1 lands were examined. There is a requirement of 21.8 hectares of Residential Phase 1 lands. The Planning Authority has zoned accordingly.</p> <p>The reference to the hectares of industrial lands and residential lands is noted. There is also a quantum of town centre lands and infill residential lands that have been identified which can accommodate significant residential development.</p> <p>It is acknowledged that the preliminary figures for the Census 2022 have been released however it there is no provision immediately to increase the population allocation for towns such as Athenry. This mechanism would have to be commenced under the GCDP 2022 -2028.</p> <p>There are lands identified as Residential Phase 1 within Athenry and these are green field sites. As part of the midterm review of the GCDP 2022 – 2028 a clearer analysis</p>

		<p>which are all are conducive to population growth and sustainable development;</p> <ul style="list-style-type: none"> • It is stated that there is a commitment to developing the lands for affordable housing subject to planning permission; • It is outlined that 24.8ha have been zoned Agriculture (industrial) whereas only 21.8ha have been zoned Residential Phase 1; • It is stated that the rezoning of these lands would facilitate imminent residential development within the town and successfully promote the delivery of adequate housing provisions to meet socio-economic targets. • It is referenced that the land is a greenfield site and could also be considered infill development, taking into account that the surrounding lands are primarily residential. • It is suggested that the residential density in Athenry should be increased from 25dph to 35dph which is more conducive to sustainable growth and limits the risk of settlement sprawl. 	<p>will become apparent which may warrant a revised core strategy allocation for towns and villages.</p> <p>In light of the above it is considered that the lands should remain Industrial.</p> <p>Chief Executive’s Recommendation No Change</p>
GLW-C60-40	John Coyne	<p>The submission relates to land at Caheroyn, Athenry. It is requested that the lands would be rezoned from Residential Phase 2 to Residential Phase 1 and the corridor of the relief road amended to facilitate residential development on the subject lands.</p>	<p>Chief Executive’s Response Submission Noted. The Draft Athenry LAP 2023 – 2029 was prepared in accordance with the core strategy of the GCDP 2022 – 2028. As part of the review of the Athenry LAP 2023 – 2029 the quantum of Residential Phase 1 lands were examined. There is a requirement of 21.8 hectares of</p>

		<p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • The Athenry Relief Road directly divides the farmland into three sections. It is suggested that the proposed location of Relief Road will destroy the newly restored lime kiln and would negatively effect their property; • It is suggested a realignment of the Relief Road 180m south (outlined proposed location in a map attached) to alleviate the issues raised above; • In relation to the rezoning request, it is stated that the zoning should be retained (Residential Phase 1) from the Athenry LAP 2012 – 2022 and that the land is fully serviced. 	<p>Residential Phase 1 lands. The Planning Authority has zoned accordingly.</p> <p>In relation to the Athenry Relief Road and the request to realign this road, it is not for LAP to propose such a realignment. A Part 8 for this road has been permitted and the LAP reflects this alignment.</p> <p>Chief Executive’s Recommendation No Change.</p>
<p>GLW-C60-133</p>	<p>Alan Kelly</p>	<p>A comprehensive submission was received in relation to lands at Slí An Chlairin, Caheroyn, Athenry. It is requested that the lands would be rezoned from Open Space/Recreation and Amenity to Residential Phase 1.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • An overview and context of the subject lands has been provided. Reference to a 2004, Galway County Council granted planning permission for 62 residential units on the site. As part of this process a number of factors were taken into consideration. • Hydrogeological Report; 	<p>Chief Executive’s Response</p> <p>Submission Noted. The Draft Athenry LAP 2023 – 2029 was prepared in accordance with the core strategy of the GCDP 2022-2028. As part of the review of the Athenry LAP 2023 – 2029 the quantum of Residential Phase 1 lands were examined. There is a requirement of 21.8 hectares of Residential Phase 1 lands. The Planning Authority has zoned accordingly.</p> <p>A section of the lands is located in the flood zone A and B and therefore these would fail the plan level justification test outlined in The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) Flood Guidelines.</p> <p>Upon review and based on the LIDAR Data and Flood Mapping referenced above, it is considered appropriate to</p>

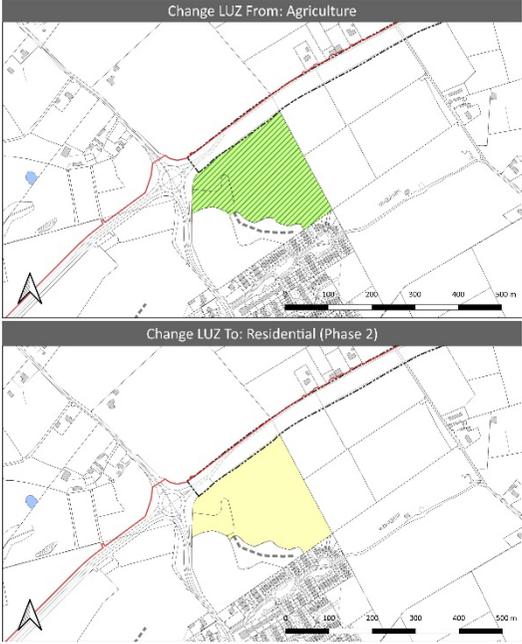
		<ul style="list-style-type: none"> • Highest expected river levels adjacent to development and impact of the development on the Clarin River; • Surface Water Discharge and Foul Water Treatment; • Agreement reached with Galway County Council for the provision of 6 affordable houses. <p>Due to the lack of capacity in the Athenry Sewage Scheme at the time, a temporary treatment plant was installed. It is stated that this resulted in 19 units not being developed at the time.</p> <p>A rationale for the rezoning request outlining sequential development;</p> <ul style="list-style-type: none"> • Brownfield site with substantial works completed; • No Flood Risk; • Upgraded Sewage scheme now completed with capacity; • Housing Shortage in Athenry and; Completed Slí An Chlairin Estate. 	<p>zone the land outside Flood Zone A and B for Residential Infill, which is for limited residential development of one to two residential units.</p> <p>Chief Executive’s Recommendation Rezone from Open Space /Recreation and Amenity to Residential Infill</p> 
<p>GLW-C60-98</p>	<p>MKO (on behalf of CLS Recruitment Group Ltd.)</p>	<p>A comprehensive submission was received in relation to lands at Gorteenacra, Athenry. It is requested that the lands would be rezoned from Open Space/Recreation and Amenity and Agriculture to Residential Phase 1</p>	<p>Chief Executive’s Response Submission Noted. The Draft Athenry LAP 2023 – 2029 was prepared in accordance with the core strategy of the GCDP 2022 – 2028. As part of the review of the Athenry LAP 2023 – 2029 the quantum of Residential Phase 1 lands were</p>

		<p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • High level policy context and review of the 2016 Census and 2022 Census. It is outlined that the 2016 Census is now out of date with a population increase of 5,765 people. It is noted that ultimately the predicted growth rate up to 2029 has already been met and queried should the 2016 figures remain in the Draft Athenry LAP; • It is stated that the plan fails to provide adequate zoning and planning for residential development within its lifetime and that this will restrict the development potential of Athenry. It is requested that the population projections are revised and how it is a missed opportunity to guide the development of Athenry in a planned and controlled way, stipulating the Draft Athenry LAP is likely out of alignment with its housing targets; • It is referenced that the lands are located adjacent to services, amenities and supporting infrastructure which are all conducive to population growth and sustainable development; • A rationale has been provided (Need, Policy Context Infrastructure & Facilities, Physical Suitability and Sequential Approach); 	<p>examined. There is a requirement of 21.8 hectares of Residential Phase 1 lands. The Planning Authority has zoned accordingly.</p> <p>It is acknowledged that the preliminary figures for the Census 2022 have been released however it there is no provision immediately to increase the population allocation for towns such as Athenry. This mechanism would have to be commenced under the GCDP 2022 - 2028.</p> <p>There are lands identified as Residential Phase 1 within Athenry and these are greenfield sites. As part of the midterm review of the GCDP 2022 - 2028 a clearer analysis will become apparent which may warrant a revised core strategy allocation for towns and villages.</p> <p>The Flood Risk Assessment has been reviewed, with a justification test referenced and it is stated that these lands would pass this test. A section of the lands is in the flood zone B and therefore it is the view point of the Planning Authority that the zoning of this section of lands would fail the plan level justification test outlined in The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines as there are alternative lands available for residential development outside a flood zone. In addition, the lands are removed from the town of Athenry where the pedestrian</p>
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		<ul style="list-style-type: none"> • The planning history of the lands has also been referenced; • A Flood Risk Assessment has also been included. 	<p>connectivity and accessibility is deficient, and the principles of sequential development would not be attributed to these lands.</p> <p>In light of the above it is considered that the lands should remain Industrial.</p> <p>Chief Executive’s Recommendation No Change.</p>
GLW-C60-76	FDG Engineering and design (on behalf of R Brady)	<p>A comprehensive submission was received in relation to lands at Raheen and Prospect, Athenry. It is requested that the lands would be rezoned from Commercial Mixed Use to Town Centre, Residential Phase 1 and Open Space/Recreation and Amenity.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • The subject lands are located within close proximity to Athenry town centre, railway station, existing road network and pedestrian connectivity. • It is stated that the lands are well located to provide a mix of commercial opportunities and development to complement the existing town centre with high-density and quality residential development; • Maps illustrating connectivity, access, phasing and the overall masterplan of the site. 	<p>Chief Executive’s Response Submission Noted. The Draft Athenry LAP 2023 - 2029 was prepared in accordance with the core strategy of the GCDP 2022 - 2028. As part of the review of the Athenry LAP 2023 – 2029 the quantum of Residential Phase 1 lands were examined. There is a requirement of 21.8 hectares of Residential Phase 1 lands. The Planning Authority has zoned accordingly.</p> <p>The strategic location of these lands is noted and it was considered appropriate to zone these lands in the Draft Athenry LAP 2023 - 2029, Commercial/Mix Use and Open Space/Recreation and Amenity (to take account of the Athenry Town Wall). The land use matrix table (1.7.1) allows for several uses in principle on these lands in terms of residential use. It is considered that the policy objective for Commercial /Mixed Use would be amended in table 1.7 to include the reference to residential as follows:</p>

		<p>A rationale for the rezoning request has been outlined as follows;</p> <ul style="list-style-type: none"> • Development centrally located; • Lands are Fully Serviced; • Athenry's Strategic Location; • Aid the Current Housing Shortage; • Smaller Scale and Neighbourhood type commercial entities such as café and creches are envisaged, and; • Green Belt surrounding the Athenry Town Wall safeguarding local heritage. 	<p>To provide for the development of commercial and complementary mixed uses on suitable lands that can provide focal points for the provision of services to surrounding neighbourhoods/areas and opportunities for commercial enterprises, retail developments, residential developments and employment creation and which do not undermine the vitality and viability of the town centre.</p> <p>The master plan submitted with indicative layout would be applicable in principle in relation to the commercial mixed-use zoning. It is considered appropriate that the lands would remain zoned Commercial Mixed Use and Open Space/Recreation and Amenity.</p> <p>Chief Executive's Recommendation Amendment to Table 1.7 To provide for the development of commercial and complementary mixed uses on suitable lands that can provide focal points for the provision of services to surrounding neighbourhoods/areas and opportunities for commercial enterprises, retail developments, residential developments, and employment creation and which do not undermine the vitality and viability of the town centre.</p>
GLW-C60-87	Tourlecan Development Ltd.	<p>A submission relates to lands at Cluain An Cathrach, Caheroyn, Athenry.</p> <p>Several points are raised as follows:</p>	<p>Chief Executive's Response Submission Noted.</p> <p>Chief Executive's Recommendation No Change</p>

		<ul style="list-style-type: none"> • Support for the rezoning of the remaining lands Residential Phase 1; • The rezoning will see the completion of the estate for its residents. 	
Residential Phase 2			
GLW-C60-95	Planning Consultancy Services (on behalf of T.J Divilly)	<p>A comprehensive submission was received in relation to lands at Ballydavid South, Athenry. It is requested that the lands would be rezoned from Agriculture to Residential Phase 2.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • Strategic Infrastructure Links; • Vehicular Access to M17/18; • Availability to sewerage and water infrastructure; • Centrally located to Education Facilities; • Pedestrian Connectivity with public lighting between the subject site and settlement; • Lands are located within proximity to the proposed Dexcom employment proposed in the IDA lands; • The requested Residential Phase 2 zoning will integrate the neighbouring lands; • Located within walking distance from Commercial, Employment and Community Facility zones; • The subject lands have the potential to integrate the remnants of the Esker Riada as part of the future layout design; • No flooding or environmental designations, and; 	<p>Chief Executive’s Response</p> <p>Submission Noted. In relation to the request for rezoning to Residential Phase 2 lands and in light of the comments from the Office of Planning Regulator under Recommendation 1, it is considered that an Urban Framework Plan would be prepared for a large tract of Residential Phase 2 lands within this area (see Map Attached as Appendix B). It is a priority of the Planning Authority to prepare a Urban Framework Plan within the lifetime of the LAP.</p> <p>The Urban Framework Plan will allow a more detailed analysis of the lands, which would include infrastructural requirements and improved pedestrian connectivity from the northern side of the railway within the town. Therefore, it is considered because of the above and to allow a more cohesive analysis, it is considered appropriate to rezone these lands Residential Phase 2, and these are now proposed to be included within the Urban Framework Plan extent also.</p> <p>See response to Chief Executives Response GLW-C60-101 above for the rationale of the Urban Framework Plan.</p>

		<ul style="list-style-type: none"> • Potential to deliver high-quality urban edge to the northwest of the settlement. <p>The submission outlined the planning history of the lands and included details of a live planning application on the site. Furthermore, the submission noted compliance with regional and local planning policy and demonstrated how the subject lands are spatially less central. In addition, the submission outlined the subject site is bounded by routes where ‘cycle tracks and footpath upgrades’ are proposed, benefitting the requested residential zoning. The submission makes reference to the development potential of the lands that were previously acknowledged by the Planning Authority and the requested rezoning is consistent with the long established zoning pattern at this location.</p>	<p>Chief Executive’s Recommendation Rezone lands from Agriculture to Residential Phase 2.</p>  <p><i>See Chief Executives Recommendation to GLW-C60-101 in relation to Recommendation 1 of the OPR Submission.</i></p>
GLW-C60-20	Matthew Kidney	<p>A submission was received in relation to lands at Caheroyn, Athenry, and outlines the support for the rezoning of these lands to Residential phase 2.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • The rezoning of these lands will allow for adequate infrastructure planning to happen to provide small-scale residential developments that are sustainably 	<p>Chief Executive’s Response</p> <p>The support for the rezoning of these lands is noted. In addition, it is considered appropriate that an Urban Framework Plan would be prepared for the large tract of Residential Phase 2 lands within this area (see Map Attached as Appendix B). It is a priority of the Planning Authority to prepare a Urban Framework Plan within the lifetime of the LAP.</p>

		<p>developed with proper planning and good design principles;</p> <ul style="list-style-type: none"> Concerns regarding the access arrangements to the Tuam Road (R347) and outlined zoning these lands Residential Phase 2 will enable access to be created in a coordinated manner where active travel measures are the focal points; It is stated that the rezoning of these lands will protect existing residential communities whilst having consideration for future communities. 	<p>The Urban Framework Plan will allow a more detailed analysis of the lands, which would include infrastructural requirements and improved pedestrian connectivity from the northern side of the railway within the town.</p> <p>See Response to Chief Executives Response GLW-C60-101 above.</p> <p>Chief Executive’s Recommendation <i>See Response to Chief Executives Recommendation GLW-C60-101 above.</i></p>
GLW-C60-21	Lisa Bailey	<p>A submission was received in relation to lands at Caheroyn, Athenry, and outlines the support for the rezoning of these lands to Residential phase 2.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> The rezoning of these lands will allow for adequate infrastructure planning to happen to provide small-scale residential developments that are sustainably developed with proper planning and good design principles; Concerns regarding the access arrangements to the Tuam Road (R347) and outlined zoning these lands Residential Phase 2 will enable access to be created in a coordinated manner where active travel measures are the focal points; It is stated that the rezoning of these lands will protect existing residential communities whilst having consideration for future communities. 	<p>Chief Executive’s Response See Response to Chief Executives Response GLW-C60-20 above.</p> <p>Chief Executive’s Recommendation <i>See Response to Chief Executives Recommendation GLW-C60-20 above.</i></p>

GLW-C60-32	Elizabeth Conneely	<p>A submission was received in relation to lands at Caheroyn, Athenry, and outlines the support for the rezoning of these lands to Residential phase 2.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • The rezoning of these lands will allow for adequate infrastructure planning to happen to provide small-scale residential developments that are sustainably developed with proper planning and good design principles; • Concerns regarding the access arrangements to the Tuam Road (R347) and outlined zoning these lands Residential Phase 2 will enable access to be created in a coordinated manner where active travel measures are the focal points; • It is stated that the rezoning of these lands will protect existing residential communities whilst having consideration for future communities. 	<p>Chief Executive’s Response See Response to Chief Executives Response GLW-C60-20 above.</p> <p>Chief Executive’s Recommendation <i>See Response to Chief Executives Recommendation GLW-C60-20 above.</i></p>
GLW-C60-72	Yvonne Leonard	<p>A submission was received in relation to lands at Caheroyn, Athenry, and outlines the support for the rezoning of these lands to Residential phase 2.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • The rezoning of these lands will allow for adequate infrastructure planning to happen to provide small-scale residential developments that are sustainably developed with proper planning and good design principles; 	<p>Chief Executive’s Response See Response to Chief Executives Response GLW-C60-20 above.</p> <p>Chief Executive’s Recommendation <i>See Response to Chief Executives Recommendation GLW-C60-20 above.</i></p>

		<ul style="list-style-type: none"> Concerns regarding the access arrangements to the Tuam Road (R347) and outlined zoning these lands Residential Phase 2 will enable access to be created in a coordinated manner where active travel measures are the focal points; It is stated that the rezoning of these lands will protect existing residential communities whilst having consideration for future communities. 	
GLW-C60-86	Patrick Carthy	<p>A submission was received in relation to lands at Caheroyn, Athenry, and outlines the support for the rezoning of these lands to Residential phase 2.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> The rezoning of these lands will allow for adequate infrastructure planning to happen to provide small-scale residential developments that are sustainably developed with proper planning and good design principles; Concerns regarding the access arrangements to the Tuam Road (R347) and outlined zoning these lands Residential Phase 2 will enable access to be created in a coordinated manner where active travel measures are the focal points; It is stated that the rezoning of these lands will protect existing residential communities whilst having consideration for future communities. 	<p>Chief Executive's Response See Response to Chief Executives Response GLW-C60-20.</p> <p>Chief Executive's Recommendation <i>See Response to Chief Executives Recommendation GLW-C60-20.</i></p>

GLW-C60-111	Tracey Moriarty	<p>A submission was received in relation to lands at Caheroyn, Athenry, and outlines the support for the rezoning of these lands to Residential phase 2.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • The rezoning of these lands will allow for adequate infrastructure planning to happen to provide small-scale residential developments that are sustainably developed with proper planning and good design principles; • Concerns regarding the access arrangements to the Tuam Road (R347) and outlined zoning these lands Residential Phase 2 will enable access to be created in a coordinated manner where active travel measures are the focal points; • It is stated that the rezoning of these lands will protect existing residential communities whilst having consideration for future communities. 	<p>Chief Executive’s Response See Response to Chief Executives Response GLW-C60-20.</p> <p>Chief Executive’s Recommendation <i>See Response to Chief Executives Recommendation GLW-C60-20.</i></p>
GLW-C60-117	Anna Falkenau	<p>A submission was received in relation to lands at Caheroyn, Athenry, and outlines the support for the rezoning of these lands to Residential phase 2.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • Reference to previous planning applications on the subject lands which have been refused for a variety of reasons by the Planning Authority and An Bord Pleanála; 	<p>Chief Executive’s Response The support for the rezoning of these lands is noted. In addition, it is considered appropriate that an Urban Framework Plan would be prepared for the large tract of Residential Phase 2 lands within this area (see Map Attached as Appendix B). It is a priority of the Planning Authority to prepare a Urban Framework Plan within the lifetime of the LAP.</p> <p>The Urban Framework Plan will allow a more detailed analysis of the lands, which would include infrastructural</p>

		<ul style="list-style-type: none"> • There is acknowledgement for the need for residential units, but it is considered that the development of the subject lands would be premature, over-development in terms of urban density and would constitute leapfrogging; • Concern is expressed in relation to the wording in policy objective under ASP 5 Residential Development Phasing to allow consideration of Residential Phase 1 development of lands at Caheroyn. It is considered that this wording is not fully clear; • It is requested that policy objective ASP 5 Residential Development Phasing to be amended to clarify the linkages and possible interaction with ASP 6 Access arrangements on Residential Phase 2. 	<p>requirements and improved pedestrian connectivity from the northern side of the railway within the town.</p> <p>It is considered that by inserting a new policy objective in relation to this Urban Framework Plan, that this will ensure that development proposals will be guided by an overall detailed plan that will consider accessibility and transport arrangements.</p> <p>See Response to Chief Executives Response GLW-C60-20.</p> <p>Chief Executive’s Recommendation <i>See Response to Chief Executives Recommendation GLW-C60-20.</i></p>
GLW-C60-118	Niamh Mc Elwaine	<p>A submission was received in relation to lands at Caheroyn, Athenry, and outlines the support for the rezoning of these lands to Residential phase 2.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • Reference to previous planning applications on the subject lands which have been refused for a variety of reasons by the Planning Authority and An Bord Pleanála; • There is acknowledgement for the need for residential units, but it is considered that the development of the subject lands would be premature, over-development in terms of urban density and would constitute leapfrogging; 	<p>Chief Executive’s Response See Response to Chief Executives Response GLW-C60-117.</p> <p>Chief Executive’s Recommendation <i>See response to Chief Executives Recommendation GLW-C60-117.</i></p>

		<ul style="list-style-type: none"> • Concern is expressed in relation to the wording in policy objective under ASP 5 Residential Development Phasing to allow consideration of Residential Phase 1 development of lands at Caheroyn. It is considered that this wording is not fully clear; • It is requested that policy objective ASP 5 Residential Development Phasing to be amended to clarify the linkages and possible interaction with ASP 6 Access arrangements on Residential Phase 2. 	
GLW-C60-119	Christina Caulfield	<p>A submission was received in relation to lands at Caheroyn, Athenry, and outlines the support for the rezoning of these lands to Residential phase 2.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • Reference to previous planning applications on the subject lands which have been refused for a variety of reasons by the Planning Authority and An Bord Pleanála; • There is acknowledgement for the need for residential units, but it is considered that the development of the subject lands would be premature, over-development in terms of urban density and would constitute leapfrogging; • Concern is expressed in relation to the wording in policy objective under ASP 5 Residential Development Phasing to allow consideration of Residential Phase 1 development of lands at Caheroyn. It is considered that this wording is not fully clear; 	<p>Chief Executive’s Response See Response to Chief Executives Response GLW-C60-117.</p> <p>Chief Executive’s Recommendation <i>See response to Chief Executives Recommendation GLW-C60-117.</i></p>

		<ul style="list-style-type: none"> It is requested that policy objective ASP 5 Residential Development Phasing to be amended to clarify the linkages and possible interaction with ASP 6 Access arrangements on Residential Phase 2. 	
GLW-C60-120	Patrick Creed	<p>A submission was received in relation to lands at Caheroyn, Athenry, and outlines the support for the rezoning of these lands to Residential phase 2.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> Reference to previous planning applications on the subject lands which have been refused for a variety of reasons by the Planning Authority and An Bord Pleanála; There is acknowledgement for the need for residential units, but it is considered that the development of the subject lands would be premature, over-development in terms of urban density and would constitute leapfrogging; Concern is expressed in relation to the wording in policy objective under ASP 5 Residential Development Phasing to allow consideration of Residential Phase 1 development of lands at Caheroyn. It is considered that this wording is not fully clear; It is requested that policy objective ASP 5 Residential Development Phasing to be amended to clarify the linkages and possible interaction with ASP 6 Access arrangements on Residential Phase 2. 	<p>Chief Executive’s Response See Response to Chief Executives Response GLW-C60-117.</p> <p>Chief Executive’s Recommendation <i>See response to Chief Executives Recommendation GLW-C60-117.</i></p>

<p>GLW-C60-125</p>	<p>Audrey O'Connor</p>	<p>A submission was received in relation to lands at Caheroyn, Athenry, and outlines the support for the rezoning of these lands to Residential phase 2.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • Reference to previous planning applications on the subject lands which have been refused for a variety of reasons by the Planning Authority and An Bord Pleanála; • There is acknowledgement for the need for residential units, but it is considered that the development of the subject lands would be premature, over-development in terms of urban density and would constitute leapfrogging; • Concern is expressed in relation to the wording in policy objective under ASP 5 Residential Development Phasing to allow consideration of Residential Phase 1 development of lands at Caheroyn. It is considered that this wording is not fully clear; • It is requested that policy objective ASP 5 Residential Development Phasing to be amended to clarify the linkages and possible interaction with ASP 6 Access arrangements on Residential Phase 2. 	<p>Chief Executive's Response See Response to Chief Executives Response GLW-C60-117 above.</p> <p>Chief Executive's Recommendation <i>See response to Chief Executives Recommendation GLW-C60-117.</i></p>
<p>GLW-C60-128</p>	<p>Shirely Lambourn</p>	<p>A submission was received in relation to lands at Caheroyn, Athenry, and outlines the support for the rezoning of these lands to Residential phase 2.</p>	<p>Chief Executive's Response See Response to Chief Executives Response GLW-C60-117.</p>

		<p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • Reference to previous planning applications on the subject lands which have been refused for a variety of reasons by the Planning Authority and An Bord Pleanála; • There is acknowledgement for the need for residential units, but it is considered that the development of the subject lands would be premature, over-development in terms of urban density and would constitute leapfrogging; • Concern is expressed in relation to the wording in policy objective under ASP 5 Residential Development Phasing to allow consideration of Residential Phase 1 development of lands at Caheroyn. It is considered that this wording is not fully clear; • It is requested that policy objective ASP 5 Residential Development Phasing to be amended to clarify the linkages and possible interaction with ASP 6 Access arrangements on Residential Phase 2. 	<p>Chief Executive’s Recommendation</p> <p><i>See response to Chief Executives Recommendation GLW-C60-117.</i></p>
GLW-C60-56	Agnieszka Kudlacik	<p>A submission was received in relation to lands at Caheroyn, Athenry, and outlines several points in objection to the rezoning of these lands to Residential phase 2. It is considered that these lands should remain Residential Phase 1 as per the 2012-2022 LAP.</p>	<p>Chief Executive’s Response</p> <p>Submission Noted. The Draft Athenry LAP 2023 – 2029 was prepared in accordance with the core strategy of the GCDP 2022 – 2028. As part of the review of the Athenry LAP 2023 – 2029 the quantum of Residential Phase 1 lands were examined. There is a requirement of 21.8 hectares of Residential Phase 1 lands. The Planning Authority has zoned accordingly.</p>

		<p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • Reference to a Planning Application for 91 Units with amenities, on the subject lands and stated this development will help address the need for residential housing and much needed amenities in Athenry; • An outline of the property market in Athenry and noted zoning the subject lands Residential Phase 2 is counterproductive with the announcement of 1,000 jobs by Dexcom Inc, coupled with the lack of residential units on offer to buy or rent in the town. 	<p>The concerns regarding the delivery of housing are noted, however it is considered that an Urban Framework Plan would be prepared for these lands in the lifetime of the LAP which would allow a more comprehensive analysis of the lands to take place. It is considered that it is justified to retain the zoning Residential Phase 2 on the lands.</p> <p>Chief Executive’s Recommendation No Change</p>
<p>GLW-C60-75</p>	<p>Matthew and Rachel Piggott</p>	<p>A submission was received in relation to lands at Caheroyn, Athenry, and outlines several points in objection to the rezoning of these lands to Residential phase 2. It is considered that these lands should remain Residential Phase 1 as per the 2012-2022 LAP.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • Reference to the wording of policy objective for Residential Phase 1; • Reference to a Planning Application for 91 Units with amenities, on the subject lands and stated this development will help address the need for residential housing and much needed amenities in Athenry; • Reference to the wording of policy objective for Residential Phase 2; 	<p>Chief Executive’s Response Submission Noted. The Draft Athenry LAP 2023 – 2029 was prepared in accordance with the core strategy of the GCDP 2022 – 2028. As part of the review of the Athenry LAP 2023 – 2029 the quantum of Residential Phase 1 lands were examined. There is a requirement of 21.8 hectares of Residential Phase 1 lands. The Planning Authority has zoned accordingly.</p> <p>The concerns regarding the delivery of housing is noted, however it is considered that an Urban Framework Plan would be prepared for these lands in the lifetime of the LAP which would allow a more comprehensive analysis of the lands to take place.</p> <p>It is considered that it is justified to retain the zoning Residential Phase 2 on the lands.</p>

		<ul style="list-style-type: none"> • It is stated that the zoning of these lands as Residential Phase 2 is a further loss for Athenry; • An outline of the property market in Athenry and noted zoning the subject lands Residential Phase 2 is counterproductive with the announcement of 1,000 jobs by Dexcom Inc, coupled with the lack of residential units on offer to buy or rent in the town. 	<p>Chief Executive’s Recommendation No Change</p>
Residential Outside Settlement Boundary			
GLW-C60-71	Grealish Glynn & Associates (on behalf of Noel and Sharon Lally)	<p>A comprehensive submission was received in relation to lands at Kingsland, Athenry. It is requested that the lands would be included in the settlement boundary and zoned Residential Phase 1.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • An outline was given in relation to the current housing situation with a particular focus on the strategic location of Athenry; • Site history and analysis of the previous refusal reasons has now been addressed as the route of the link road is now finalised and the sewer has been upgraded and extended to within meters of the lands; • Propose boundary follows the line of the proposed Athenry Relief Road and the NTA has advised in their submission that the delivery of the eastern section of the Athenry Relief Road is likely to be beyond the lifetime of this LTP, meaning this zoning will not affect the future development of the link road; 	<p>Chief Executive’s Response Submission Noted. The Draft Athenry LAP 2023 – 2029 was prepared in accordance with the core strategy of the GCDP 2022 – 2028. As part of the review of the Athenry LAP 2023 – 2029 the quantum of Residential Phase 1 lands were examined. There is a requirement of 21.8 hectares of Residential Phase 1 lands. The Planning Authority has zoned accordingly. The subject lands are outside the settlement boundary as per the Draft Athenry LAP 2023-2029. It is noted the reference to the construction of the wastewater infrastructure near the lands, however from a connectivity and sequential development perspective the lands are regarded as removed from the envelope of the town. The lack of footpath connectivity to these lands is of concern and therefore in this instance it is considered that the lands should remain unzoned and outside the settlement boundary.</p> <p>Chief Executive’s Recommendation</p>

		<ul style="list-style-type: none"> • Connectivity to Town Centre (750m), Athenry Railway Station (800m) and Primary School (500m); • Access to Educational Facilities; • Access to new Sewer Line; • It is stated that there is an imbalance of development in the Town Centre, and the subject lands are shovel ready to aid the shortage of housing in the area. 	No Change
GLW-C60-89	Planning Consultancy Services (on behalf of Laurem Construction Ltd.)	<p>A comprehensive submission was received in relation to lands at Farranablake East, Athenry. It is requested that the lands would be included in the settlement boundary and zoned Existing Residential and Residential Phase 1 as per the extant LAP 2012-2022.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • The planning history of the subject lands have been outlined and compliance with regional and local planning policy and it is stated that the subject lands are spatially and sequentially located in comparison to other Residential Phase 1 zonings; • It is indicated that the lands are greenfield however there are elements of brownfield characteristics; • The lands have strategic infrastructure links with vehicular Access to M17/18; • There is sewerage and water infrastructure availability; • The lands are centrally located to Education Facilities; • Located within walking distance from Commercial, Employment and Community Facility zones; 	<p>Chief Executive’s Response</p> <p>The Draft Athenry LAP 2023 – 2029 was prepared in accordance with the core strategy of the GCDP 2022 – 2028. As part of the review of the Athenry LAP 2023 – 2029 the quantum of Residential Phase 1 lands were examined. There is a requirement of 21.8 hectares of Residential Phase 1 lands. The Planning Authority has zoned accordingly. The planning history and previous zonings of these lands are noted. However, it is considered that to zone these lands Residential Phase 1 and Residential Existing as requested would be contrary to sequential development and would lead to greater car based journeys.</p> <p>The Walking and Cycling Measures on <i>Figure 6.1 Emerging Preferred Strategy Walking and Cycling Measures</i> of the submission is noted, however this map (which is extracted</p>

		<ul style="list-style-type: none"> • Footpath connectivity can be provided to the remainder of the settlement as outlined in proposals in live planning applications; • Lands are located within proximity to the proposed Dexcom employment proposed in the IDA lands; • Development of lands will complement the adjoining Pairc Na hAbhainn housing estate, and; • No flooding or environmental designations; • Reference to 'cycle tracks and footpath upgrades' are outlined which complements the proposed, residential zoning; • Reference is made to the development potential of the lands that were previously acknowledged by the Planning Authority and the requested rezoning is consistent with the long established zoning pattern at this location. 	<p>from the LTP) is at slight variance to the map illustrating these measures in the LAP, which is identified as Figure 5: Emerging Preferred Strategy Walking and Cycling Measures. It is the map in the LAP that reflects the measures that the Local Authority are proposing in conjunction with the Infrastructure and Operations section of the Local Authority.</p> <p>Therefore, in light of the above it is considered that the lands should remain un-zoned and outside settlement boundary.</p> <p>Chief Executive's Recommendation Figure 6.1 Emerging Preferred Strategy Walking and Cycling Measures is updated to reflect measure on LTP Page. 56</p>
GLW-C60-47	Patrick Hanley	<p>A comprehensive submission was received in relation to lands at Kingsland, Athenry. Reference is made to the 2012-2022 LAP and that the lands were zoned Residential Phase 2. It is requested that the lands would be included in the settlement boundary and zoned Residential.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • Availability to services, 100m from new wastewater mains addressing previous concerns; • Accessibility, the lands are located suitable for sustainably active travel to the town centre, railway station and industrial zones; <ul style="list-style-type: none"> ○ 600m from Town Centre 	<p>Chief Executive's Response</p> <p>The Draft Athenry LAP 2023-2029 was prepared in accordance with the core strategy of the GCDP 2022-2028. As part of the review of the Athenry LAP the quantum of Residential Phase 1 lands were examined. There is a requirement of 21.8 hectares of Residential Phase 1 lands. The Planning Authority has zoned accordingly.</p> <p>It is acknowledged that the preliminary figures for the Census 2022 have been released however it there is no provision immediately to increase the population allocation</p>

		<ul style="list-style-type: none"> ○ 800m from Railway Station • Lands surrounded by two sides of Residential Development and is approximately 500m from Primary School; • It is referenced that the shortage of housing in Athenry and given the increased population and announcement of Dexcom, it is critical that good quality housing is available in the area; • Reference to the Census and the population density of Athenry; • Reference to the objections received on submissions on the Residential Phase 1 zoning from residents in Cullairbaun and Fern Hill estate. It is suggested that a swap would take place that would allow these residential areas retain the green space and the reallocation of these lands to the lands as per this submission; • Reference is made to the overdevelopment north of the railway line and underdevelopment south of the line, creating a north/south divide; • The proposed Athenry Relief Road as a boundary prevents equitable and balanced development of the area and the land in question is outside the proposed Relief Road but has all the benefits of services and access which are required. 	<p>for towns such as Athenry. This mechanism would have to be commenced under the GCDP 2022 - 2028.</p> <p>There are lands identified as Residential Phase 1 within Athenry and these are green field sites. As part of the midterm review of the GCDP 2022 – 2028 a clearer analysis will become apparent which may warrant a revised core strategy allocation for towns and villages.</p> <p>The previous zonings of these lands are noted, however it is considered that to zone these lands Residential as requested would be contrary to sequential development and would lead to greater car based journeys.</p> <p>Chief Executive’s Recommendation No Change</p>
GLW-C60-69	Paddy Kennedy (on behalf of	A submission was received in relation to lands at Kingsland, Athenry. Reference is made to the 2012-2022 LAP and that the lands were zoned Residential. It is requested that the	<p>Chief Executive’s Response</p> <p>The Draft Athenry LAP 2023 - 2029 was prepared in accordance with the core strategy of the GCDP 2022-2028.</p>

	Mattie Kennedy)	<p>lands would be included in the settlement boundary and zoned Residential.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • It is stated that there is no apparent reason as to why the lands have been unzoned. The lands are located adjoining the Relief Road and the lands are fronting onto the public road; • It is requested the lands would revert to the Residential Zoning that was originally put in place in the Athenry LAP 2012- 2022. 	<p>As part of the review of the Athenry LAP the quantum of Residential Phase 1 lands were examined. There is a requirement of 21.8 hectares of Residential Phase 1 lands. The Planning Authority has zoned accordingly. It is noted that in the 2012-2022 LAP the lands were zoned a mixture of Residential Phase 2 and Agriculture. The previous zoning of these lands is noted, however it is considered that to zone these lands Residential as requested would be contrary to sequential development and would lead to greater car based journeys. There is a deficiency in footpaths at this location.</p> <p>Chief Executive’s Recommendation No Change.</p>
Residential Existing			
GLW-C60-3	JG Quirke Associates	<p>The submission is in relation to lands located in Pairc Na Ri, Athenry. The submission is objecting to the proposed partial rezoning of lands. An area to the rear of the development has been zoned Open Space/ Recreation and Amenity, which was previously zoned Residential Existing. The submission stipulated development was granted planning permission for 3 no. apartments, 3 no. duplex units and 64 no. dwelling houses. In December 2022, Pairc Na Ri was practically completed with 60 units constructed. Nonetheless, the submission states the final commencement was contingent on decommissioning the temporary treatment plant and connection to the Uisce Éireann network. The submission outlines a pre-connection</p>	<p>Chief Executive’s Response Submission noted. The Planning Authority acknowledge the subject land is zoned Open Space/Recreational and Amenity in the Draft Athenry LAP 2023 – 2029. A review of the land was undertaken on the 11th August 2023 which indicated the lands demonstrate brownfield characteristics coupled with the decommissioning of a temporary treatment plant and connection to Uisce Éireann’s network. Based on this assessment it is considered appropriate to change the zoning of subject land to Residential Existing.</p> <p>Chief Executive’s Recommendation</p>

		<p>enquiry has been submitted to Uisce Éireann and groundworks are being finalised to connect to the network.</p>	<p>Zone lands from Open Space/Recreation and Amenity to Residential Existing.</p> 
<p>GLW-C60-6</p>	<p>JG Quirke Associates</p>	<p>The submission is in relation to lands located in the development known as “An Saileachain”, Athenry. It is requested for the lands to be rezoned Open Space/ Recreation and Amenity to Residential.</p> <p>Several points have been raised as follows;</p> <ul style="list-style-type: none"> • Reference to planning history 06/1213, and; • Decommissioning of temporary treatment plant and connect to Uisce Éireann network, these lands are requested to be rezoned to address the housing need in the area. 	<p>Chief Executive’s Response</p> <p>Submission noted. The Planning Authority acknowledge the subject land is zoned Open Space/Recreational and Amenity. The allocation of these lands reflects the granted permission under PI Ref 22/141. A review of the land was undertaken on the 11th August 2023 which indicated the lands demonstrate brownfield characteristics coupled with the decommissioning of a temporary treatment plant and connection to Uisce Éireann’s network. Based on this assessment it is considered appropriate to change the zoning of the subject land to Residential Existing. It should</p>

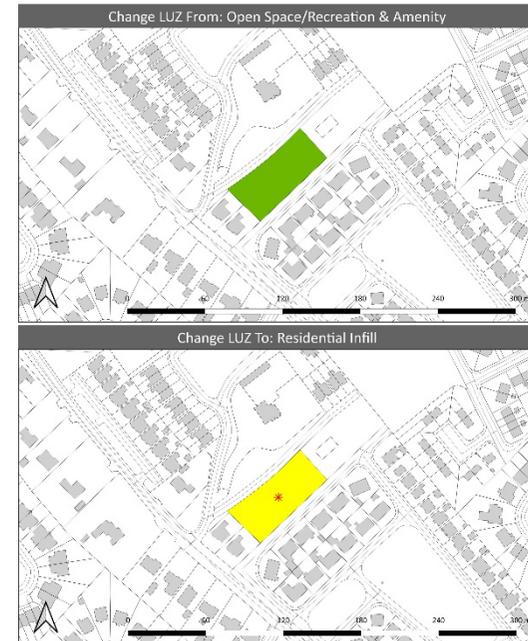
			<p>also be noted that within the subject lands there is a parcel of land to be retained Open Space/Recreational and Amenity as per the Draft Athenry LAP.</p> <p>Chief Executive’s Recommendation Zone lands from Open Space/Recreation and Amenity to Residential Existing.</p> 
<p>GLW-C60-7</p>	<p>Ryehill Planning and Design (on behalf of Belville Construction)</p>	<p>This submission is in relation to land located in Cluain Lara, Athenry. It is requested that the lands would be rezoned from Open Space/Recreation and Amenity to Residential Infill.</p> <p>Several points have been raised as follows;</p>	<p>Chief Executive’s Response Submission noted. The Planning Authority acknowledge the subject land is zoned Open Space/Recreational and Amenity in the Draft Athenry LAP 2023 – 2029. A review of the land was undertaken on the 11th August 2023 which indicated the lands demonstrate greenfield characteristics</p>

- It is stated that the lands were zoned Residential Phase 2 in the Athenry LAP 2012 – 2022;
- Reference to a previous planning permission and an outline of how the estate Cluain Lara was developed. It is also stated a new planning application will be submitted to complete the estate;
- It is referenced that the treatment plant has since been decommissioned and the estate is now connected to the public wastewater network;
- It is stated that it is the developer’s intention to now complete the estate upon the completion of the upgrade works to the Athenry Wastewater Treatment Plant and associated sewerage network in Athenry;
- A justification has been submitted and the need for additional housing in Athenry.

coupled with the decommissioning of a temporary treatment plant and connection to Uisce Éireann’s network. Based on this assessment it is considered appropriate to change the zoning of subject land to Residential Infill. It should also be noted that within the subject lands there is a parcel of land to be retained Open Space/Recreational and Amenity as per the Draft Athenry LAP.

Chief Executive’s Recommendation

Rezone section of land from Open Space/Recreational and Amenity to Residential Infill.



<p>GLW-C60-91</p>	<p>Planning Consultancy Services (on behalf of Leadlane Ltd)</p>	<p>This submission is in relation to land located at Cullairbaun and in front of An Cheathrú Bhán housing estate which is partially occupied and partly under construction. It is requested that the lands would be rezoned from Open Space/Recreation and Amenity to Residential Existing. Several points have been raised as follows;</p> <ul style="list-style-type: none"> • Reference to national, regional and local planning context has been outlined; • It is referenced that the lands have clear infill and brownfield characteristics, and the planning history shows that houses were previously indicated on this site as part of a masterplan; • The northern part of the site has consisted of a construction compound for the estate and the solid concrete foundation of the former Council water tank is located at the southern section of the site; • It is stated that the subject lands would complete the existing estate; • It is stated that the lands are bounded by routes where 'cycle tracks and footpath upgrades' are proposed, benefitting the requested residential zoning; • It is requested that the “water feature” symbol would be removed. 	<p>Chief Executive’s Response</p> <p>Submission noted. A review of the current land use was undertaken on the 11th August 2023 and details from the submission indicated the lands demonstrate brownfield characteristics. Based on this assessment it is considered appropriate to change the subject lands to Residential Existing. In addition, reference to the Water feature is noted and the symbol has been removed.</p> <p>Chief Executive’s Recommendation</p> <p>Zone lands from Open Space/Recreation and Amenity to Residential Existing.</p> 
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			<p>Remove water symbol and zone lands from Open Space/Recreation and Amenity to Residential Existing.</p> 
<p>GLW-C60-96</p>	<p>MKO (on behalf of Kathleen Coffey)</p>	<p>This submission is in relation to land located at An Raheen House, Raheen, Athenry. It is requested that the lands would be rezoned from Open Space/Recreation and Amenity to Residential Existing Several points have been raised as follows;</p> <ul style="list-style-type: none"> • It is stated that the lands were zoned Residential Existing in the Athenry LAP 2012 – 2022; 	<p>Chief Executive’s Response Submission Noted. Upon review it is deemed appropriate to amend the zoning as requested to reflect the curtilage of Raheen House.</p> <p>Chief Executive’s Recommendation Zone lands from Open Space/Recreation and Amenity to Residential Existing.</p>

		<ul style="list-style-type: none"> It is outlined that the lands are privately owned and the zoning would reflect the current use associated with An Raheen House. 	
<p>GLW-C60-104</p>	<p>Ruth and Joe Maloney</p>	<p>This submission is in relation to land located in Farranablake East, Athenry.</p> <p>It is requested that the lands would be included in the settlement boundary and zoned Existing Residential.</p> <p>Several points have been raised as follows;</p> <ul style="list-style-type: none"> Concern is expressed because their existing houses have been removed from the settlement boundary; It is stated that the lands are serviceable and are located within easy reach of the shopping centre, the town centre, local schools, and the IDA lands where Dexcom intend to develop. 	<p>Chief Executive’s Response</p> <p>The previous zoning of these lands is noted. The lands are not being proposed to be included based on a number of limitations i.e connectivity and reliance on greater car based journeys.</p> <p>As these properties are proposed to be outside the settlement boundary, and future development proposals will be examined under Policy Objectives in Chapter 4 Rural Living and Development and Chapter 15 Development Management Standards in the GCDP 2022 – 2028.</p>

			Chief Executive's Recommendation No change.
General Residential			
GLW-C60-29	Colin Parr	<p>The submission has raised concerns regarding the development especially to the North of Athenry Railway Line.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • It is stated that north of the railway (Tuam Road) is densely populated; • It is suggested that lands to the south of Athenry (Kingsland) should be zoned Residential Phase 1 as they are closer to schools, amenities, and access to M6 Motorway; • It is stated that the Athenry Ring Road to the south should not act as an invisible barrier to the town and the Ring Road should be pushed further east to allow for the expansion of the Town. 	<p>Chief Executive's Response</p> <p>Submission Noted. The concerns regarding the overpopulation to the lands north of the railway line are noted. The Draft Athenry LAP 2023 – 2029 was prepared in accordance with the core strategy of the GCDP 2022 – 2028. As part of the review of the Athenry LAP 2023 – 2029 the quantum of Residential Phase 1 lands were examined. There is a requirement of 21.8 hectares of Residential Phase 1 lands. The Planning Authority has zoned accordingly.</p> <p>The reference to the north of the railway is noted. There are several constraints to the south of the railway line and south of the Part 8 Athenry Relief Road. There is extensive flooding that has been indicated and these lands have been zoned Open Space/Recreation and Amenity and there are areas identified in the submission that has limited accessibility in terms of pedestrian and cycling connectivity. However, the measures in the LTP will in the next number of years help alleviate these constraints.</p> <p>Chief Executive's Recommendation No Change</p>
GLW-C60-58	Norman Walsh	This submission has raised three observations;	Chief Executive's Response

		<p>Lack of Balance in Zoning The submission outlines that Residential areas will be concentrated to the North of the Town Centre, similar to Open Space Recreation & Amenity areas;</p> <p>Overdevelopment of the Tuam Road (R347) It is stated that most of the housing in Athenry has been built on the Tuam Road. This has resulted in the Tuam Road now becoming a busy and dangerous road for locals despite recent traffic calming initiatives. It is considered that the draft plan proposes further residential development behind estates which will result in increased traffic and impact the safety of residents, and;</p> <p>Proposed rezoning of Cullairbaun Estate The rezoning of the green area in Cullairbaun is referenced stating the space is very much loved and valued amenity by its residents. The submission noted the space as an important oasis of nature and biodiversity in an urbanised area. Reference to Policy Objective ASP 23 Open Space, Recreation and Amenity and stated that Cullairbaun is not surplus to the local community nor are there any proposals to replace or provide a better provision.</p>	<p>Submission noted.</p> <p>The reference to the north of the railway is noted. There are several constraints to the south of the railway line and south of the Part 8 Athenry Relief Road. There is extensive flooding that has been indicated and these lands have been zoned Open Space/Recreation and Amenity and there are areas identified in the submission that has limited accessibility in terms of pedestrian and cycling connectivity.</p> <p>See response to GLW-C60-11 above.</p> <p>Chief Executive’s Recommendation See response to Chief Executives Recommendation to GLW-C60-11 above.</p>
GLW-C60-102	Sara Walls	<p>This submission has raised four observations;</p> <p>Garraí Glas Estate The submission welcomes the rezoning of lands to the rear of Garraí Glas Estate. The submission references GLW-C60-53 and has raised a query regarding access routes to subject lands. The submission expressed its concern regarding the</p>	<p>Chief Executive’s Response</p> <p>Submission Noted. As part of the Draft Athenry LAP 2023 – 2029 these lands have been zoned Residential Phase 1. Specifics in relation to access arrangements will be addressed at planning applications stage. In addition, there</p>

		<p>right of way through Garraí Glas Estate from Tuam Road to Cúirt Ard and requested clarity on the matter. The submission noted ideally access would emerge onto Cúirt Ard with a bollard-type barrier to prevent a 'rat run' whilst also allowing pedestrian flow.</p> <p>Tuam Road The submission has concerns regarding future developments on Tuam Road. The submission stated planning permission has been given to a field at the Tuam Road/Ring Road Roundabout and the lands zoned industrial. The submission stated owing to the high volume of walking school children using the Tuam Road, that special consideration needed to be given to future development at this location.</p> <p>The junction of the Newline, Tuam Road, Railway Bridge and Station Road The submission outlined health and safety concerns for school children at this junction with narrow footpaths. The submission requests junction improvement be made.</p> <p>Cullairbaun The submission objects to the zoning of land in the Cullairbaun estate and the removal of the green space.</p>	<p>are several measures identified in the LTP that addresses connectivity within the residential areas within the town.</p> <p>The LAP is accompanied with a LTP which has several measures identified. There are also several policy objectives contained in the plan to improve connectivity measures.</p> <p>The LTP aims to address these issues.</p> <p>See response to GLW-C60-11 above.</p> <p>Chief Executive's Recommendation See response to Chief Executives Recommendation to GLW-C60-11 above.</p>
GLW-C60-132	Kevin McLoughlin	The submission has concerns regarding the safety and extra volume of traffic on the Tuam Road. The submission notes planning permission was previously granted to the rear of	<p>Chief Executive's Response Submission Noted. The LAP is accompanied with a LTP which has several measures identified. There are also</p>

		<p>the estate that they live in and expressed concern regarding further development proposals and access arrangements. It is suggested that an alternative access route via Monivea Road would be proposed.</p>	<p>several policy objectives contained in the plan to improve connectivity measures.</p> <p>Access arrangements will be addressed at the planning application stage which is required to be accompanied by several transport assessments which will examine transport issues.</p> <p>Chief Executive’s Recommendation No Change</p>
Commercial Mixed Use			
GLW-C60-39	RMLA (on behalf of Tesco Ireland)	<p>A comprehensive submission was received. It is outlined that there has been amendments made to the land use matrix table, ‘Commercial/Mixed Use’ land use zoning in which ‘Shops -Large Scale Convenience/Comparison Centre’ will now be considered ‘Not Normally Permitted’.</p> <p>A definition of “Not normally Permitted” is referenced as follows: <i>“except in exceptional circumstances, will not be permitted by the Local Authority ‘due to the perceived effect on existing and permitted uses, incompatibility with the policy objectives, standards and requirements contained in this plan or the fact that it may be inconsistent with the proper planning and sustainable development of the area.”</i></p> <p>It is stated that there is a risk that existing retail maybe considered a non-conforming use and this would result in stagnation within the retail market.</p>	<p>Chief Executive’s Response</p> <p>Submission noted. In the Draft Athenry LAP 2023 -2029 the lands are zoned Commercial Mixed Use. In specific reference to the categories under Commercial Mixed Use the comment is noted in relation to <i>Large Scale Convenience/Comparison Centre</i>. It is considered appropriate that in this instance to include a new Policy Objective ASP 85 Non-Conforming Uses is proposed;</p> <p>Policy Objective ASP 85 Non-Conforming Uses Generally, permit reasonable intensification of, extensions to and improvement of premises accommodating non-conforming uses, subject to normal planning criteria.</p> <p>Chief Executive’s Recommendation Policy Objective ASP 85 Non-Conforming Uses Generally, permit reasonable intensification of, extensions to and improvement of premises accommodating non-conforming uses, subject to normal planning criteria.</p>

		<p>It is requested that provision would be made to provide for non-conforming uses as follows: <i>“provision for reasonable intensification of extensions to and improvement of premises, accommodating these uses to be permitted subject to normal planning criteria.”</i></p>	
GLW-C60-85	<p>Genesis Planning and Urban Design on of Ghost Zapper Ltd (as part of Comer Group)</p>	<p>A comprehensive submission has been received in relation to lands located immediately adjacent to Athenry Town Centre.</p> <p>It is requested that the lands would be rezoned from Open Space/Recreational and Amenity to Commercial Mixed Use. In addition, it is stated that a policy objective can be included with reference to a buffer zone along the Athenry Walls and Clarin River.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • High level spatial policy context has been outlined; • Reference to the sequential development; • Reference to the Tier 1 serviced site (and serviceable lands to the east of the Clarin River) which is a central location. It is stated that the planning rationale is to deliver a high-quality mixed-use development in Athenry; • Concept design has been submitted in relation to the proposed lands; • With the rezoning of the lands it is considered that the following can be achieved: 	<p>Chief Executive’s Response</p> <p>Submission Noted. The lands are zoned Commercial -Mixed Use and Open Space/Recreation and Amenity. The reference and content of the master plan for these lands has been noted. As part of the preparation of the LAP a Flood Risk Assessment has been prepared in accordance with <i>The Planning System and Flood Risk Management (2009)</i> guidelines.</p> <p>A parcel of the lands zoned Open Space/Recreation and Amenity are in Flood Zone A and B and have failed the Plan-level justification test outlined in the Guidelines. Therefore, the proposed zoning at such in Flood Zone A and B lands would not follow the Guidelines. This submission includes a Flood Risk Assessment that considers the Project-level justification outlined in the Guidelines - which cannot be considered at a LAP level.</p> <p>There is an area of land zoned Open Space/Recreation and Amenity outside the flood zone however due to the location of these lands it is considered appropriate that this land is retained as per the zoning in the Draft LAP. These lands are regarded as strategic within Athenry and would complement the adjacent Commercial Mixed Use Zoning.</p>

		<ul style="list-style-type: none"> i. Restore Athenry House as a focal point for the Town; ii. Connectivity to the eastern side of Clarin River; iii. High-quality public realm and new public park and walkway alongside the Clarin River; iv. Respond to locational context (density, scale efficient use of land and opportunity); v. Medium-density development, and; vi. Healthcare and Retirement Housing. <p>Reference to the flood risk identified in the Draft Athenry LAP 2023 – 2029 is made and the following points are applicable:</p> <ul style="list-style-type: none"> • An overview of the flood risk area has been outlined and the flood risk that the flood maps carried out under the CFRAM study between 2009-2011 remain applicable; • It is stated that the current SFRA (Athenry LAP 2012 - 2022) identified the land as suitable for the commercial mixed-use zoning. In this context, there is no change in terms of the flood risk affecting the lands and therefore no basis for the lands not to be zoned for Mixed Use again in the Draft Athenry LAP 2023 – 2029; • It is referenced that the that both the current planning application and the Masterplan layout have been designed to report to and incorporate the floodplain and detailed site-specific flood modelling carried out by industry experts. It is 	<p>In reference to the buffer wall around Athenry Town Wall, it is considered warranted that additional wording to Policy Objective ASP 43 would be proposed. Policy Objective ASP 43 would be proposed as follows;</p> <p>Policy Objective ASP 43 (b) It is a policy objective of the Council to safeguard Athenry Town Wall by ensuring any development proposed has due recognition of this unique heritage asset within the town. Any potential proposals shall be accompanied by a visual impact assessment, archaeological assessment and architectural conservation assessment/statement in addition to relevant and applicable planning criteria.</p> <p>Chief Executive’s Recommendation Additional wording to Policy Objective Policy Objective ASP 43</p> <p>Policy Objective ASP 43 (b) It is a policy objective of the Council to safeguard Athenry Town Wall by ensuring any development proposed has due recognition of this unique heritage asset within the town. Any potential proposals shall be accompanied by a visual impact assessment, archaeological assessment and architectural conservation assessment/statement in addition to relevant and applicable planning criteria.</p>
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		<p>stated that there are no constraints from a flood risk perspective to justify a change in zoning from what was previously assessed under the Athenry LAP 2012 - 2022. The Justification Test has been passed both under the Development Plan Test and Development Management Justification Test; so, policy compliance is achieved for the Masterplan;</p> <ul style="list-style-type: none"> • It is stated that a site-specific design response can be addressed via planning applications and will ultimately be informed by a Flood Risk Assessment, Archaeology Assessments and Landscape Assessments. A Flood Risk Assessment has been submitted. 	
<p>GLW-C60-123</p>	<p>Genesis Planning and Urban Design on of Ghost Zapper Ltd (as part of Comer Group)</p>	<p>A comprehensive submission has been received in relation to lands located immediately adjacent to Athenry Town Centre.</p> <p>It is requested that the lands would be rezoned from Open Space/Recreational and Amenity to Commercial Mixed Use. In addition, it is stated that a policy objective can be included with reference to a buffer zone along the Athenry Walls and Clarin River.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • High level spatial policy context has been outlined; • Reference to the sequential development; • Reference to the Tier 1 serviced site (and serviceable lands to the east of the Clarin River) which is a central location. It is stated that the 	<p>Chief Executive’s Response See Chief Executives Response to GLW-C60-85</p> <p>Chief Executive’s Recommendation <i>See Chief Executives Recommendation to GLW-C60-85</i></p>

		<p>planning rationale is to deliver a high-quality mixed-use development in Athenry;</p> <ul style="list-style-type: none"> • Concept design has been submitted in relation to the proposed lands; • With the rezoning of the lands it is considered that the following can be achieved: <ul style="list-style-type: none"> i. Restore Athenry House as a focal point for the Town; ii. Connectivity to the eastern side of Clarin River; iii. High-quality public realm and new public park and walkway alongside the Clarin River; iv. Respond to locational context (density, scale efficient use of land and opportunity); v. Medium-density development, and; vi. Healthcare and Retirement Housing. <p>Reference to the flood risk identified in the Draft Athenry LAP 2023 – 2029 is made and the following points are applicable:</p> <ul style="list-style-type: none"> • An overview of the flood risk area has been outlined and the flood risk that the flood maps carried out under the CFRAM study between 2009-2011 remain applicable; • It is stated that the current SFRA (Athenry LAP 2012 - 2022) identified the land as suitable for the commercial mixed-use zoning. In this context, there is no change in terms of the flood risk affecting the lands and therefore no basis for the lands not to be 	
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		<p>zoned for Mixed Use again in the Draft Athenry LAP 2023 – 2029;</p> <ul style="list-style-type: none"> • It is referenced that the that both the current planning application and the Masterplan layout have been designed to report to and incorporate the floodplain and detailed site-specific flood modelling carried out by industry experts. It is stated that there are no constraints from a flood risk perspective to justify a change in zoning from what was previously assessed under the Athenry LAP 2012 - 2022. The Justification Test has been passed both under the Development Plan Test and Development Management Justification Test; so, policy compliance is achieved for the Masterplan; • It is stated that a site-specific design response can be addressed via planning applications and will ultimately be informed by a Flood Risk Assessment, Archaeology Assessments and Landscape Assessments. A Flood Risk Assessment has been submitted 	
GLW-C60-94	<p>Planning Consultancy Services on behalf of RHOC (Athenry) Ltd</p>	<p>A comprehensive submission(with maps outlining the lands) has been received in relation to lands in Caherroyn, Athenry.</p> <p>It is requested that the lands would be rezoned as follows:</p> <ol style="list-style-type: none"> From Open Space/Recreation & Amenity to Commercial/Mixed Use and From Residential Existing to Commercial/Mixed Use. 	<p>Chief Executive’s Response</p> <p>Submission noted.</p> <p>The lands are zoned Existing Residential and Open Space/Recreation and Amenity. The reference to the live planning application is noted, however the process of preparing a LAP is carried out under the statutory process of the Planning and Development Act 2000 (as amended) .</p>

		<p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • High level review of strategic planning policy context; • Reference to a live planning application on this site, consisting of a mixed-use office and residential development proposal; • Concern is expressed regarding the proposal to replace the Commercial Mixed Use zoning on the lands with a mixture of Residential Existing and Open Space/Recreation and Amenity. It is referenced that if the zoning was adopted as per the Draft Plan, the Board would have no option but to refuse the planning permission on the basis of material contravention with the LAP zoning objectives; • It is specifically requested that Commercial Mixed-Use zoning is reinstated as per the Athenry LAP 2012 – 2022 to safeguard the development potential of the lands and the live planning application. <p>Several reasons have been outlined to support the rezoning;</p> <ul style="list-style-type: none"> • Strategic Infrastructure Links; • Vehicular Access to M17/18; • Availability to sewerage and water infrastructure; • Centrally located to Education Facilities; • Located within walking distance from Commercial, Employment and Community Facility zones; 	<p>As part of the preparation of the Draft Athenry LAP 2023 - 2029 a full review of land uses in Athenry was undertaken. A Flood Risk Assessment was prepared which informed the lands use zonings and the zoning of the lands was carried out in accordance with <i>The Planning System and Flood Risk Management (2009) Guidelines</i>.</p> <p>The subject lands zoned Open Space/Recreation and Amenity are in Flood Zone B and have failed the Plan-level justification test outlined in the Guidelines. Therefore, the proposed zoning as such in Flood Zone B lands would not be in accordance with the Guidelines. This submission includes a Flood Risk Assessment that considers the Project-level justification outlined in the Guidelines - which cannot be considered at a LAP level.</p> <p>The subject lands outside the Flood Zone B are zoned Existing Residential which reflects the established residential area and therefore it is considered that this zoning is appropriate.</p> <p>As outlined above it is considered that the lands should be retained as Open Space/Recreation and Amenity and Existing Residential.</p> <p>Chief Executive’s Recommendation No Change</p>
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		<ul style="list-style-type: none"> • Footpath connectivity can be provided to the remainder of the settlement as outlined in proposals in live planning applications; • Lands are located within proximity to the proposed Dexcom employment proposed in the IDA lands; • No Built Heritage or Environmental designations; • Site Specific Flood Risk Assessment identified the future fluvial flood risk associated with the Clarin River, and confirmed that commercial use within Flood Risk Zone B is appropriate at this location, and; • The development would not adversely affect the environment or local ecology, and; • It is stated that the lands are bounded by routes where 'Traffic Calming and Footpath upgrades' are proposed, benefitting the requested Commercial Mixed Use zoning. 	
GLW-C60-92	<p>Planning Consultancy Services on behalf of RHOC (Athenry) Ltd</p>	<p>A comprehensive submission(with maps outlining the lands) has been received in relation to lands in Caherroyn, Athenry.</p> <p>It is requested that the lands would be rezoned as follows:</p> <p>iii. From Open Space/Recreation & Amenity to Commercial/Mixed Use and</p> <p>iv. From Residential Existing to Commercial/Mixed Use.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • High level review of strategic planning policy context; 	<p>Chief Executive's Response</p> <p>See Chief Executives Response to GLW-C60-94 above. (Same submission but different maps attached-This would appear to be in error).</p> <p>Chief Executive's Recommendation</p> <p><i>See Chief Executives Recommendation GLW-C60-94.</i></p>

		<ul style="list-style-type: none"> • Reference to a live planning application on this site, consisting of a mixed-use office and residential development proposal; • Concern is expressed regarding the proposal to replace the Commercial Mixed Use zoning on the lands with a mixture of Residential Existing and Open Space/Recreation and Amenity. It is referenced that if the zoning was adopted as per the Draft Plan, the Board would have no option but to refuse the planning permission on the basis of material contravention with the LAP zoning objectives; • It is specifically requested that Commercial Mixed-Use zoning is reinstated as per the Athenry LAP 2012 – 2022 to safeguard the development potential of the lands and the live planning application. <p>Several reasons have been outlined to support the rezoning;</p> <ul style="list-style-type: none"> • Strategic Infrastructure Links; • Vehicular Access to M17/18; • Availability to sewerage and water infrastructure; • Centrally located to Education Facilities; • Located within walking distance from Commercial, Employment and Community Facility zones; • Footpath connectivity can be provided to the remainder of the settlement as outlined in proposals in live planning applications; 	
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		<ul style="list-style-type: none"> • Lands are located within proximity to the proposed Dexcom employment proposed in the IDA lands; • No Built Heritage or Environmental designations; • Site Specific Flood Risk Assessment identified the future fluvial flood risk associated with the Clarin River, and confirmed that commercial use within Flood Risk Zone B is appropriate at this location, and; • The development would not adversely affect the environment or local ecology, and; <p>It is stated that the lands are bounded by routes where 'Traffic Calming and Footpath upgrades' are proposed, benefitting the requested Commercial Mixed Use zoning.</p>	
Business and Enterprise			
GLW-C60-107	Paul and Deirdre Whelan	<p>This submission is in relation to land at Ballygarraun, Athenry. The submission is requesting a zoning change from Agricultural to Business and Enterprise.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • The site will have access to Northern Road and Ballygarraun Road. • Lands are adjoining Residential Phase 1 lands which will have access to the sewer network. • The subject lands are opposite the zoned Business and Technology and IDA lands. 	<p>Chief Executive's Response</p> <p>Submission noted. In the Athenry LAP 2012 – 2022 the land is zoned Agriculture. In the Draft Athenry LAP 2023 – 2029 Agriculture zoning has been retained. It is therefore considered appropriate and justified to retain this land as Agriculture in the Draft Athenry LAP 2023 – 2029. The subject land has limited access and land is located to the rear of existing residential dwellings. In addition, there is no merit in zoning the land Business and Enterprise. It is considered that there are sufficient Business and Enterprise lands zoned within the settlement boundary.</p> <p>Chief Executive's Recommendation</p> <p>No change.</p>

Business and Technology

GLW-C60-90

MKO on behalf of IDA Ireland

This submission is in relation to lands in Newford, Athenry. The submission is seeking an amendment to the Land Use Zoning map and a zoning change at the edge of the subject site from Open Space/Recreation and Amenity to Business and Technology. The submission has provided a rationale for the rezoning stating the current zoning is not conducive to the development strategy of the subject site. The submission outlined the land use zoning could prejudice the delivery of the Dexcom Project as the primary access point is via the existing roundabout which adjoins the northern boundary of the site. The submission expressed concern that the vehicular access for the proposed Dexcom development or any other built element of the project that encroaches into the Open Space/ Recreation and Amenity around the perimeter of the site would represent a material contravention of the development plan and could present a challenge/obstacle to any subsequent planning application.

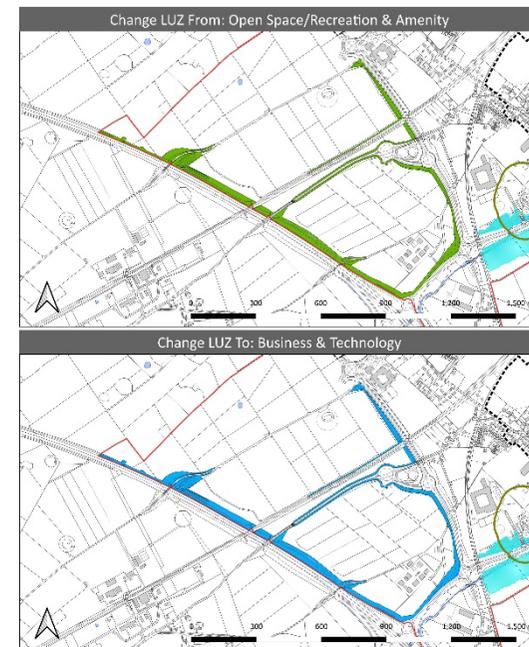
Furthermore, the submission highlights the need for adequately zoned residential lands in the strategic town of Athenry is of paramount importance to the future development of the IDA Ireland Athenry Strategic Site, the Oranmore strategic site and other key development locations within the Galway Strategic Economic Corridor.

Chief Executive's Response

Submission Noted. Upon review it is deemed appropriate to amend the zoning as requested to reflect the land banks ownership.

Chief Executive's Recommendation

Zone lands from Open Space/Recreation and Amenity to Business and Technology.



Industrial

GLW-C60-68

Paddy Kennedy on behalf of Kevin Burke

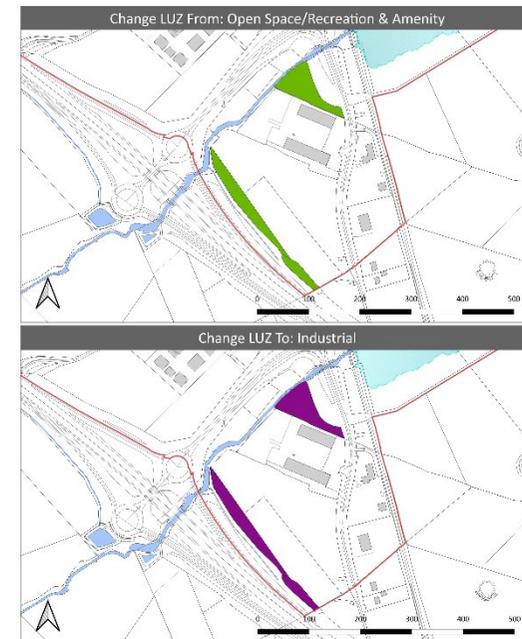
This submission relates to lands in Furzypark, Athenry. The submission is seeking an amendment to the land use zoning map and a zoning change at the edge of the subject site from Open Space/Recreation and Amenity to Industrial. The submission stated this rezoning will assist in completing the overall development of these lands which are currently under development.

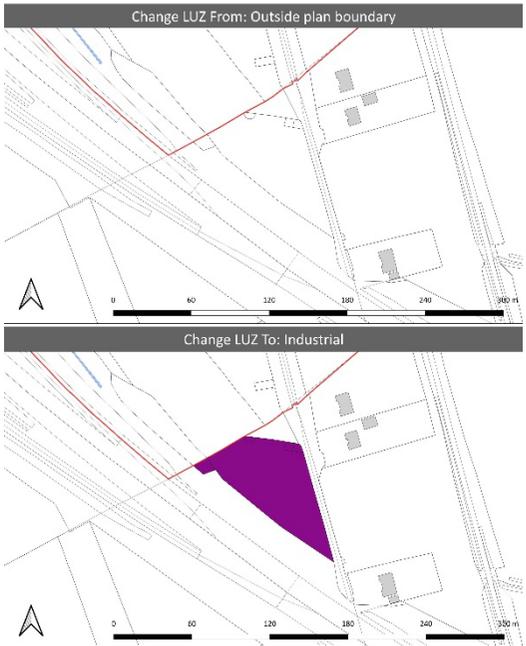
Chief Executive's Response

Submission Noted. Upon review it is deemed appropriate to amend the zoning as requested to reflect the existing industrial enterprise.

Chief Executive's Recommendation

Zone lands from Open Space/Recreation and Amenity to Industrial.



			<p>Zone lands from Outside Settlement Boundary to Industrial.</p> 
<p>GLW-C60-44</p>	<p>Oliver and Geraldine Whelan</p>	<p>This submission relates to land in Moanbaun, Athenry. The submission is requesting to extend the settlement boundary and zone lands Industrial. The submission has provided a rationale for the rezoning request as outlined below;</p> <ul style="list-style-type: none"> • The land is located on the Northern Ring Road; • Adjacent to industrial zoned land subject to a planning application; 	<p>Chief Executive’s Response</p> <p>Submission noted. The subject lands are unzoned as they are located outside the settlement boundary. Upon review it is not considered warranted or appropriate to extend the settlement boundary and zone the subject land Industrial. The GCDP 2022–2028 has policy objectives for rural-related development in <i>Chapter 4 Rural Living and Development</i> and <i>Chapter 5 Economic Development, Enterprise, and Retail Development</i>.</p>

		<ul style="list-style-type: none"> • Plans and funding to complete the Northern Ring Road (Ballygurrane section) enabling access to M6/M17/M18; • Close proximity to IDA lands; • A marked decrease in the amount of Industrial zoned lands in the Draft Athenry LAP 2023 -2029, and; • Athenry Sewerage Plant upgrade enable additional capacity for both residential units and employment in Athenry. 	<p>Chief Executive’s Recommendation</p> <p>No change.</p>
GLW-C60-84	MKO on behalf of Production Equipment UC	A comprehensive submission has been received in relation to land in Ballydavid South, Athenry. The submission outlines the spatial planning context of their request, specifically referencing the GCDP 2022 – 2028 and the Draft Athenry LAP 2023 - 2029. The submission is requesting to extend the settlement boundary and zone lands Industrial. The submission has provided a rationale (Infrastructure & Facilities and Physical Suitability) for the rezoning and referred to the planning history on the site. The submission stipulated the site currently has a live planning application for a large industrial development.	<p>Chief Executive’s Response</p> <p>Submission noted. The subject lands are unzoned as they are located outside the settlement boundary. Upon review it is not considered warranted or appropriate to extend the settlement boundary and zone the subject land Industrial. The GCDP 2022–2028 has policy objectives for rural-related development in <i>Chapter 4 Rural Living and Development and Chapter 5 Economic Development, Enterprise, and Retail Development</i>.</p> <p>Chief Executive’s Recommendation</p> <p>No change.</p>
GLW-C60-93	Planning Consultancy Service on behalf of T.J Divilly	A comprehensive submission has been received in relation to lands in Ballydavid South, Athenry. The submission provided an overview of the site location and context. The submission is requesting to extend the settlement boundary and zone lands Industrial. Several points are raised as follows:	<p>Chief Executive’s Response</p> <p>Submission noted. The subject lands are unzoned as they are located outside the settlement boundary. Upon review it is not considered warranted or appropriate to extend the settlement boundary and zone the subject land Industrial. The GCDP 2022–2028 has policy objectives for rural-related development in <i>Chapter 4 Rural Living and Development</i></p>

		<ul style="list-style-type: none"> • Strategic Infrastructure Links; • Vehicular Access to M17/18; • Availability to sewerage and water infrastructure; • Pedestrian connectivity with public lighting between the subject site and settlement; • Lands are located within close proximity to the proposed Dexcom development on the IDA lands; • Located within walking distance from Commercial, Employment and Community Facility zones; • The subject lands have the potential to integrate the remnants of the Esker Riada as part of the future layout design, and; • No flooding or environmental designations. <p>The submission noted compliance with regional and local planning policy and discussed the strategic potential of the site being situated in the Strategic Economic Corridor. In addition, the submission outlined the subject site is bounded by routes where 'cycle tracks and footpath upgrades' are proposed, benefitting the requested industrial zoning.</p>	<p><i>and Chapter 5 Economic Development, Enterprise, and Retail Development.</i></p> <p>Chief Executive's Recommendation No change.</p>
Community Facilities			
GLW-C60-18	Galway and Roscommon Education and Training Board	This submission relates to lands at Athenry Co-operative Livestock Mart, Prospect, Athenry. The submission requests the rezoning of the lands from Business & Enterprise to Community Facilities. The submission outlined significant growth in pupil numbers in the Athenry Area, particularly Clarin College which has been identified in a demographic	<p>Chief Executive's Response</p> <p>Submission noted. The Planning Authority acknowledges the requirement to accommodate growth and expansion of educational facilities in Athenry. A full review of Business and Enterprise lands within the Draft Athenry LAP 2023 - 2029 was undertaken. The lands have been zoned to reflect</p>

		<p>analysis carried out by the Department of Education & Skills. The submission states to facilitate growth, space for expansion will be required and this land is the only area adjacent to Clarin College site to facilitate school expansion.</p>	<p>the established use at this location. In Table 1.7.1 the use Education – Primary/Secondary is “Not Normally Permitted” on Business and Enterprise lands. However, upon review it is considered appropriate to amend the Land Use Matrix Table to “Open for Consideration” to facilitate growth of educational facilities in Athenry.</p> <p>Chief Executive’s Recommendation Amend Land Use Matrix Table 1.7.1 as follows: Education – Primary/Secondary on Business and Enterprise Lands</p> <p>From:</p> <table border="1" data-bbox="1346 710 2033 778"> <tr> <td>Public, Community and Institutional Uses</td> <td>C1</td> <td>C2</td> <td>R</td> <td>I</td> <td>BT</td> <td>BE</td> <td>T</td> <td>CF</td> <td>OS</td> <td>A</td> <td>PU</td> <td>TI</td> </tr> <tr> <td>Education – Primary/Secondary</td> <td>O</td> <td>*O</td> <td>O</td> <td>O</td> <td>O</td> <td>N</td> <td>N</td> <td>*P</td> <td>*O</td> <td>O</td> <td>N</td> <td>N</td> </tr> </table> <p>To:</p> <table border="1" data-bbox="1346 815 2033 884"> <tr> <td>Public, Community and Institutional Uses</td> <td>C1</td> <td>C2</td> <td>R</td> <td>I</td> <td>BT</td> <td>BE</td> <td>T</td> <td>CF</td> <td>OS</td> <td>A</td> <td>PU</td> <td>TI</td> </tr> <tr> <td>Education – Primary/Secondary</td> <td>O</td> <td>*O</td> <td>O</td> <td>O</td> <td>O</td> <td>O</td> <td>N</td> <td>*P</td> <td>*O</td> <td>O</td> <td>N</td> <td>N</td> </tr> </table>	Public, Community and Institutional Uses	C1	C2	R	I	BT	BE	T	CF	OS	A	PU	TI	Education – Primary/Secondary	O	*O	O	O	O	N	N	*P	*O	O	N	N	Public, Community and Institutional Uses	C1	C2	R	I	BT	BE	T	CF	OS	A	PU	TI	Education – Primary/Secondary	O	*O	O	O	O	O	N	*P	*O	O	N	N
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Education – Primary/Secondary	O	*O	O	O	O	O	N	*P	*O	O	N	N																																											

Environmental and Flooding Concerns

<p>GLW-C60-88</p>	<p>Planning Consultancy Service on behalf of Pat Joyce</p>	<p>This submission is in relation to the WWTP (Waste Water Treatment Plant) Buffer 100m, located within Athenry Shopping Centre at Prospect, Athenry. It is requested that the WWTP Buffer 100m would be removed from the Land Use Zoning Map at Prospect.</p>	<p>Chief Executive’s Response Submission Noted. A review of the parameters of the buffer zone was re-examined. Policy Objective <i>ASP 27 Public Utilities</i> is contained in Section 4 of the Draft Athenry LAP 2023 – 2029 and is also reflect in a similar Policy Objective in Volume 2 of the GCDP 2022 – 2028. It is considered that the buffer zone would be removed however it should be noted that Policy Objective <i>ASP 27 Public Utilities</i> would be referenced and any planning</p>
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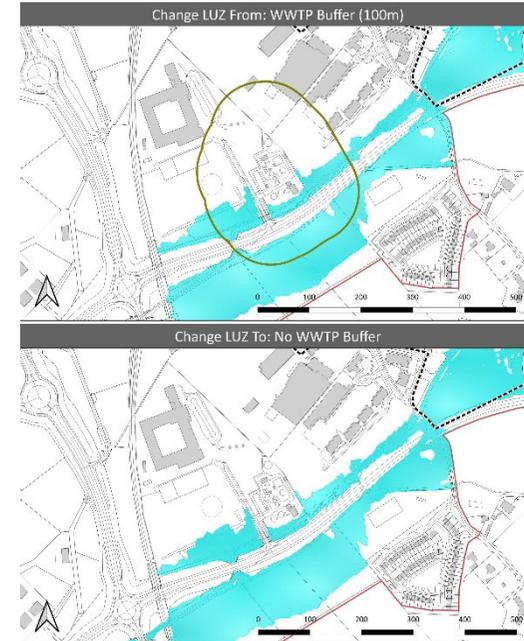
Several points are raised as follows:

- A review of Town and Village zoning maps from the GCDP 2022 – 2028 was undertaken and no mapped WWTP Buffer were identified for any of the zoned settlements. It is stated the inclusion of a WWTP Buffer in Athenry is inconsistent with other adopted zoning plans and is unwarranted;
- Reference to Ministerial confirmation of no statutory requirement for WWTP Buffer Zone. In 2018, The Minister for Housing, Planning and Local Government confirmed that “There are no statutory minimum buffer zones set for wastewater treatment plants”;
- Reference to a Confirmation of Feasibility (COF) from Uisce Éireann for wastewater connection at Prospect, Athenry. The COF did not mention a wastewater buffer constraint, as illustrated in the LAP and would run contrary to an established COF from Irish water;
- Reference to the Chief Executives Report from the GCDP 2022 – 2028 which confirmed it is not appropriate to have a standard buffer zone of 100m for all WWTP. An extract of the Chief Executives Report accompanies the submission;
- Reference to the absence of Policy Objectives to support a WWTP Buffer Zone in the Written Statement of the Draft LAP;
- It is contended that there is direct conflict with the “C2- Commercial Mixed Use” Zoning Objective under the provisions of the Draft LAP Zoning Map. In the event

applications near the WWTP would be assessed on an individual basis against this policy objectives and the proper planning and development of the area.

Chief Executive’s Recommendation

Removal of WWTP Buffer from Land Use Zoning Map



		<p>that the WWTP Buffer Zone were to remain, it runs the risk of sterilizing the development of 1.18 Hectares of serviced “C2” zoned lands. In this circumstance, the WWTP Buffer Zone would directly conflict with the “C2” zoning objective in this area;</p> <ul style="list-style-type: none"> • It is stated that the imposition of a WWTP buffer on strategically important zoned and serviced lands, will unnecessarily impair the growth, function, and designated “Strategic Potential” of Athenry. 	
GLW-C60-26	Joseph Kileen	<p>The submission relates to land at Caherroy, Athenry. Concern has been expressed in relation to flooding which has occurred on numerous occasions at the rear of properties.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • The Flood Risk Management Map the area in question is located in Flood Zone C; • Inadequate drainage, and the drains are regularly filled during normal rainfall and has resulted in gardens flooding frequently; • Several photographs illustrate the extent of flooding on these lands. 	<p>Chief Executive’s Response</p> <p>Submission noted.</p> <p>The CFRAMS mapping from the OPW indicates that adjacent and nearby lands to the south/south-east are at risk from fluvial flooding. The Industrial lands are a similar elevation as the south/south-east lands. The lands to the north-east, north, west and south-west of the Industrial lands are at higher elevation than the Industrial lands and are likely to be draining to some degree into the Industrial site.</p> <p>Based on the above, it is considered that the site is at elevated risk from pluvial flooding and may be at elevated risk from fluvial flooding to a similar degree as the lands to the south/south-east, which are at similar elevation. The visual inspection of these lands with rushes present etc would also demonstrate poor drainage.</p>

			<p>Based on planning history (22/119) and the analysis above it is considered that the lands should be rezoned from Industrial to Open Space/Recreation and Amenity.</p> <p>Chief Executive’s Recommendation Rezoned land from Industrial to Open Space/Recreation and Amenity.</p> 
<p>GLW-C60-80</p>	<p>Rory Mc Carthy</p>	<p>The submission relates to Clarin Crescent, Caherroyn, Athenry. The submission has referred to the industrial lands on Monivea Road. Concern has been expressed in relation to flooding.</p>	<p>Chief Executive’s Response Submission Noted. See Chief Executives Response on GLW-C60-26 to the flooding issues raised.</p>

		<p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • Concern regarding the level and increase of flooding due to the proposed development of the site which serves as a flood plain; • It is stated that the lands flood during periods of heavy rain, however the water does not enter the properties on all occasions; • It is referenced that in the past 12 years, the houses have flooded on 4 occasions when the floodwater has encroached on the back doors of some houses. • It is stated that a major concern for the residents of Clarin Crescent is whether there will be adequate provision included in this proposed industrial site to protect the dwellings from flooding which has happened in the past and is expected to happen again. • It is queried that if the flood plain was filled, the house nearest the site would be subject to an increased level of flooding in the future. An outline is given of the measures completed by Clarin Crescent residents to protect their houses from experiencing flooding. <p>A number of other points have been raised:</p> <ul style="list-style-type: none"> • Risk of surface water flooding from the industrial site and all new proposed housing in the area; • Requesting a Hydrology Report be compiled including a Flood Risk Assessment for the areas; 	<p>As part of the preparation of the Athenry LAP, a number of additional strategies/reports have been prepared which informs the zoning and policy objectives of the plan. A LTP was prepared which accompanies the plan with measures outlined to address traffic and connectivity issues within</p>
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		<ul style="list-style-type: none"> • Querying why is Industrial development being carried out in a predominantly residential area; • Querying if an Environmental Assessment has been carried out and outlining the impacts to the immediate area; • The new Athenry Link Road intersection to the Monivea Road will generate additional surface water to the Clarin River; • Are the lands serviced with Uisce Éireann Infrastructure; • No maintenance to the Clarin River; • Traffic Calming measures on Monivea Road are inadequate and need to be addressed, and; • The completion of Athenry Relief Road needs to be a priority. 	<p>the town. A Strategic Environmental Assessment, Natural Impact Report and Strategic Flood Risk Assessment have been prepared which also informs the land use plan.</p> <p>Noted. The LTP has been prepared with the LAP and is a strategic document, to guide future transport investment with specific focus on sustainable and active travel. Traffic calming measures, if investigated and deemed to be merited, can be addressed at a granular or operational level, or can also be considered holistically in line with the more strategic measures in the LTP - as a supporting element of delivering more sustainable modes of travel.</p> <p>Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C60-26</i></p>
GLW-C60-73	John and Nadine Martin	<p>The submission has raised three observations.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • Concern expressed in relation to the Industrial zonings to the rear of dwellings at Clarin Crescent, Caherroyne, Athenry. It is referenced that the lands are in the Flood Zone C. It is noted that the lands 	<p>Chief Executive's Response</p> <p>As per the Chief Executives Response on GLW-C60-26 to the flooding issues raised.</p>

		<p>flood and neighbours within the estate have been affected. The submission added the proposed development to the north of the town will result increased flooding;</p> <ul style="list-style-type: none"> It is outlined that to the north of Athenry is regarded as a bottleneck from the Monivea Road, through Ballydavid Cottages and onto Caheroy Road. It is stated that there are already significant traffic problems that will be exacerbated with the proposed new developments in the locality with no apparent plan for relief or redirection evidenced. It is suggested that changing the one-way system of the New Line and urgently installing proper traffic calming measures; It is suggested that lands to the south Kingsland) have been omitted from the plan which is deemed more suitable. 	<p>The reference to the north of the railway is noted. There are several constraints to the south of the railway line and south of the Part 8 Athenry Relief Road. There is extensive flooding that has been indicated and these lands have been zoned Open Space/Recreation and Amenity and there are areas identified in the submission that has limited accessibility in terms of pedestrian and cycling connectivity.</p> <p>Noted. The LTP has been prepared with the LAP and is a strategic document, to guide future transport investment with specific focus on sustainable and active travel. Traffic calming measures, if investigated and deemed to be merited, can be addressed at a granular or operational level, or can also be considered holistically in line with the more strategic measures in the LTP - as a supporting element of delivering more sustainable modes of travel.</p> <p>Noted. See point above.</p> <p>Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C60-80</i></p>
GLW-C60-108	Joe and Eileen Glynn	The submission relates to Clarin Crescent and the Captains Pond, Caherroyn, Athenry. The submission has referred to	Chief Executive's Response

		<p>the industrial lands on Monivea Road. Concern has been expressed in relation to flooding.</p> <p>Several points are raised as follows:</p> <ul style="list-style-type: none"> • It is stated that with the increases in building works in the general area, it is expected the water levels to increase in times of heavy rainfall; • It is stated that there are no provisions for any works to be completed on the Clarin River; • It is stated that the flooding may lead to damage to residents' homes which has happened in the past. <p>In addition to the flooding issues, there is reference to how traffic calming measures have not been addressed properly on the Monivea Road into Athenry.</p>	<p>See Chief Executives Response on GLW-C60-26 to the flooding issues raised.</p> <p>Noted. The LTP has been prepared with the LAP, and as such this has identified measures for improvements in traffic flow, connectivity and accessibility. The delivery of the LTP measures are operational issues and such the Planning Section will liaise with the Infrastructure and Operations Section of the Local Authority on the delivery of these measures.</p> <p>Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C60-26</i></p>
Local Transport Plan			
GLW-C60-4	Brenden Mc Guinness	The submission is concerning the Draft Athenry LTP - Section 3.8.1 Walking Network. The submission noted the walkway did not go through the proper planning process and residents were advised that this was merely a temporary solution to allow pedestrian access to Clarin	<p>Chief Executive's Response</p> <p>Submission noted. A central tenet of the LTP is the accessibility and permeability of neighbourhoods with the town centre and community uses. WC64 is identified as one such measure which connects neighbourhoods to adjacent education facilities. The LTP's implementation of all</p>

		College. The submission outlined several issues and expressed concern and frustration for Lorro Gate Residents.	measures will be closely examined and delivered in consultation with all relevant stakeholders. Chief Executive's Recommendation No Change.
GLW-C60-115	Gerry Burke	<p>The submission has raised several themes regarding the LTP and LAP. The submission referred to 2.3.3.3 Market Square Public Realm Enhancement Project and the emerging Option 5. The submission stated in Option 5, Burkes Lane will be pedestrianised and parking removed from Market Square. The submission noted all options have not addressed the preservation of the Market Cross, and suggests the Cross is moved indoors for its preservation. The submission also recommended the restoration of the Dovecote in the grounds of the new Aldi Car Park.</p> <p>The submission discusses section 3.8.1 Walking Network from the LTP, outlining that Lorro Gate Walkway does not have Planning Permission and was presented to residents as a temporary walkway to enable Clarin College to open in 2020. The submission noted the residents have been inconvenienced by the walkway. The submission added there is no road markings, traffic management plan, or litter management. Residents are confined to their homes during school drop-offs/pickup times. The submission states this route (WC64) should be removed.</p> <p>The submission included an extract (3.8.4 Road Network) from the LTP regarding traffic building up around the new</p>	<p>Chief Executive's Response Submission noted. The LTP is a high-level strategy document focusing on network planning, specific detail on the implementation of measures will be defined at a project level. The delivery of the LTP measures are operational issues and such the Planning Section will liaise with the Infrastructure and Operations Section of the Local Authority on the delivery of these measures.</p> <p>A central tenet of the LTP is the accessibility and permeability of neighbourhoods with the town centre and community uses. WC64 is identified as one such measure which connects neighbourhoods to adjacent education facilities. The implementation of the LTP measures will be closely examined and delivered in consultation with all relevant stakeholders.</p> <p>Submission noted. This will be examined at an operation level by the Local Authority.</p>

		<p>Presentation College. The submission noted in its Planning Application the Presentation College proposed an “in” and “out” gate to alleviate congestion and the submission has queried why this was not included when the college was built.</p> <p>The submission supports ASP 44 Protection of Athenry House. The submission commended the zoning of lands to the east of Athenry House Open Space/ Recreation & Amenity. The submission recommends considering zoning all of the lands around Athenry House Open Space/ Recreation & Amenity.</p>	<p>Submission noted. It is considered appropriate that the land around the Flood Risk area is zoned Open Space/Recreation and Amenity. It is considered the Policy Objectives <i>ASP 44 Protection of Athenry House</i> is sufficient to protect Athenry House.</p> <p>Chief Executive’s Recommendation No Change.</p>
<p>GLW-C60-103</p>	<p>The Wheels of Athenry</p>	<p>The submission has raised a number of themes regarding the LAP and LTP;</p> <p>The submission discussed how Athenry is a compact town with a vast majority of its population living within 10 minutes cycle from the Town and many of its services. However, the reality is despite the growing cycling culture, more of the population access those services via car. The submission stated there is a real opportunity to develop intra-urban cycling infrastructure to unlock the demand. The submission noted the LAP is significant because Athenry has not been included in the NTA Cycle Connects Plan due to the population not meeting the criteria. The submission outlined the existing cycling infrastructure, lack of permeability within existing development, planned population growth, and generally well below modal share</p>	<p>Chief Executive’s Response Submission noted.</p> <p>The preparation of the LTP prioritised proposals for a comprehensive network of safe active travel routes within the study area. The support for safe cycling infrastructure is noted. The roll-out of LTP measures will occur in line with NTA policies and funding resources, and in accordance with statutory planning procedures.</p> <p>Interurban Active Travel routes are outside the scope of the study area, but an Athenry to Oranmore interurban route is included in the NTA's Cycle Connects Plan and the LTP is consistent with the build-out of this route via WC01.</p>

		<p>for cycling, it is therefore imperative that the aspirations outlined in <i>ASP 52 Pedestrian and Cycle Network</i> and the emerging preferred strategy for Walking and Cycling – Figure 4 of LTP is fully implemented. Having regard to the proposed measures the submission recommended the following items to be included in The Athenry LAP 2023 - 2029;</p> <ul style="list-style-type: none"> • Town Wall Walk; • Connectivity to Pairc Na hAbhainn; • Clarin College Connectivity; 	<ul style="list-style-type: none"> • The Town Wall Walk forms a core part of the proposed Active Travel Network in the LTP, and the potential for the route to form a complete active travel loop of the town is noted and will be considered as the LTP is amended following the LAP public consultation process. The LTP proposes for the Town Wall Walk to be an Active Travel route suitable for both walking and cycling, but design details will be decided at a project level; • An active travel crossing of the R348 from Páirc na hAbhainn towards Athenry Shopping Centre is proposed in the Draft LTP as part of WC06; • Proposed measure WC03 involves the provision of segregated footpaths and cycle tracks along both sides of the R348 for the entire length between the Relief Road and the R347, passing Athenry Shopping Centre. This is not entirely clear on the map while showing the existing one-way cycle track added on the Clarin College side of the road. The maps will be amended to clarify in the Final LTP;
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		<ul style="list-style-type: none"> • Caherroyn Road and Rail Bridge; • Housing Estate Permeability; • Safe Routes to School; 	<ul style="list-style-type: none"> • In relation to Caherroyn Road, there are existing engineering constraints at the railway bridge that pose an impediment to the provision of active travel infrastructure. However, the requirement for safe active travel facilities along the corridor is noted, and footpath upgrades are proposed along Caherroyn Road as part of measure WC25. Measures have been proposed in the plan to improve access across the rail line to enable residents along Caherroyn Road to safely travel north-south along the road. Specific design details would be defined at a project level and delivery, as with all measures, is subject to NTA approval and funding; • The need for improved permeability between housing estates is recognised within the LTP and a number of short but impactful links are proposed to improve permeability such as WC50, WC57 and WC59; • The provision of safe pedestrian and cycling routes to school was a core focus during the development of the LTP. The consideration of multiple options over the rail line from the Tuam Road/Raheen Road to the school campus off the Tuam Road, linking into a network of proposed segregated cycle tracks from residential areas on the northern side of the rail line, can be seen in Appendix C. In combination with the suggested new
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		<ul style="list-style-type: none"> • Traffic Calming and Crossing Points; • Bike/Rail Integration; • Athenry/Oranmore Cycleway; • National Cycle Manual; 	<p>active travel bridge at the rail station, cycle facilities proposed on the Tuam Road, Raheen Road, Station Road, Raheen Woods Road, L3103, outside Presentation College, L3112, Bridge Street, Prospect and as part of the Town Wall and River Clarin Walks all of which, in combination with existing cycle infrastructure, link together the schools in the town;</p> <ul style="list-style-type: none"> • The LTP is a strategic plan focused on network planning, however at a project level when LTP active travel measures of different categories are being advanced, appropriate measures to calm traffic and install pedestrian crossings will be included in the design proposals; • The LTP proposes measures for the provision of cycle facilities to the train station and the development of a cycle parking strategy which would be expected to include cycle parking at major destinations such as the train station. Text highlighting the potential of bike/rail integration will be added to the Final LTP; • Submission noted. The extent of the Athenry/Oranmore Cycleway is outside the Plan Area; • The LTP included the published National Cycle Manual in its consideration of policy, as per section 2.2. This informed the network planning approach within the LTP. All projects designed during the implementation
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		<ul style="list-style-type: none"> • Proposed Cycle/Pedestrian Bridge, and; • Active Travel Plan 	<p>phase of the LTP will be in line with the appropriate version of the National Cycle Manual;</p> <ul style="list-style-type: none"> • As per Appendix C of the Draft LTP, the location of the active travel bridge (WC40) was considered during the Options Selection Stage of the LTP process, with the published option chosen as the preferred location for this bridge at a strategic level. If this measure was to implementation, further detailed consideration of design would be required; • The LTP is a high-level strategy document focusing on network planning, specific detail on the implementation of measures will be defined at a project level. The Planning Authority is examining certain measures for the delivery in the short term, but the availability of resources, including funding and design personnel, will be a significant consideration in respect of the delivery of any or all measures. <p>Chief Executive’s Recommendation: No Change.</p>
GLW-C60-51	Conor Hurley	This submission has raised issues regarding the transportation and movement from Abbey Glen Estate to Athenry Town Centre. The submission noted there is poor access to the Town due to the narrow and unsafe pathway along the R347. The submission stated the need for a raised zebra crossing to allow children and elderly residents to access the town from Abbey Glen Estate. The crossing	<p>Chief Executive’s Response Submission noted. The Draft LTP contains proposed measure WC21 to address the issues raised in the submission. This will support the provision of pedestrian upgrades along the R347 to improve accessibility and permeability within the confines of the Settlement</p>

		needs to be raised to reduce the speed of vehicular traffic. The submission has suggested the area inside the wall which runs along the R347, and old town walls be utilised to construct a new safe pedestrian and cycleway as outlined in the figures attached in the submission.	Boundary. There are Policy Objectives within the Draft LAP and LTP to support the implementation of these measures. Chief Executive's Recommendation No Change.
GLW-C60-52	Conor Hurley	This submission outlined the need for The Quiet Man Greenway to be prioritised to increase tourism in Athenry. The submission stated if reopened, it would allow a safe, family-friendly route for young and old to exercise while stimulating local businesses.	Chief Executive's Response Submission noted. There is a suite of Policy Objectives contained within the GCDP 2022 - 2028 (Chapter 6 Transport and Movement and Chapter 10 Natural Heritage Biodiversity and Green/Blue Infrastructure) and Draft LAP that support the provision of greenways such as The Quiet Man Greenway. Chief Executive's Recommendation No Change.
General Comments			
GLW-C60-54	Gareth Mc Elhinney & Mary McGill	A comprehensive submission has been received on several themes; Vision & Strategic Context The submission notes Policy Objectives <i>ASP 4 Proliferation of Individual Uses, ASP 11 Town Centre and ASP 12 Town Centre Management</i> seek to focus on primary retail areas in the town centre. The submission suggested a number of underutilised, unoccupied and derelict buildings in the town centre that should be repurposed, regenerated and reoccupied in advance of permitting new developments in a compact and confined town centre. The submission outlines the introduction of new retail and commercial	Chief Executive's Response Submission noted. Submission noted. There are a suite of Policy Objectives contained within the GCDP 2022 – 2028 (<i>Chapter 3 Place - making, Regeneration and Urban Living and Chapter 5 Economic Development, Enterprise and Retail Development</i>) and the Draft Athenry LAP 2023 -2029 (<i>ASP 12 Town Centre Management, ASP 31 High Quality, Contextually Sensitive Design, ASP 38 Architectural Heritage and ASP 39 Architectural Conservation Areas</i>) which support the redevelopment and regeneration of buildings

		<p>development in the town will increase car transport, making it unsafe for pedestrians and cyclists and impacts options to regenerate Market Square and Cross Street.</p> <p>Land Use Zoning</p> <p>The submission has outlined that Residential development seems to be focused primarily to the north of the railway line with only one parcel of land zoned Commercial Mixed Use which is already occupied by a local shop. The submission adds the development of only residential areas on the periphery of Athenry will generate increased traffic flow adding to the congestion of the town. The submission states large tracts of land are zoned for a single purpose. The area between the Tuam Road and Western Rail Corridor is solely zoned Residential Phase 2. The submission suggests a spread of Residential and Commercial Mixed Use development would be more attractive, creating vibrant neighbourhoods where people can live, shop and enjoy recreational activities.</p> <p>The submission outlines the rezoning of lands east of Clarin River at Athenry House to Open Space/Recreation and Amenity creating a cycleway/ walkway. The creation of a larger public park in Athenry would provide an attractive and enjoyable focus for the town centre.</p>	<p>with the aim to alleviate the dereliction within Athenry Town Centre.</p> <p>Submission noted. In relation to Residential Phase 2 lands (between the Tuam Road and Western Rail Corridor) and in light of the comments from the Office of Planning Regulator under Recommendation 1, it is considered that an Urban Framework Plan would be prepared for a large tract of Residential Phase 2 lands within this area (see Map Attached as Appendix B). It is a priority of the Planning Authority to prepare a Urban Framework Plan within the lifetime of the LAP. The Urban Framework Plan will allow a more detailed analysis of the lands, which would include infrastructural requirements and improved pedestrian connectivity from the northern side of the railway within the town. Therefore, as a result of the above this will enable a more cohesive analysis it is considered appropriate to rezone these lands Residential Phase 2, and these are now proposed to be included within the Urban Framework Plan extent also. <i>See Chief Executives Response to GLW-C60-101 in relation to Recommendation 1 of the OPR Submission.</i></p> <p>Submission noted. In the Athenry LAP 2012 - 2022 the land surrounding Athenry House is zoned Commercial Mixed Use. Likewise, land adjacent to the Clarin River (east of Athenry House) is zoned Commercial Mixed Use. In the Draft Athenry LAP 2023 – 2029, the Commercial Mixed Use</p>
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		<p>Transport and Movement</p> <p>The submission notes the TII’s observation regarding the LTP and Draft Athenry LAP specifically the measures required to support compact growth by providing active travel measures and public transport improvements. The submission indicated formal bus stops should be created to provide safe stopping areas. The submission notes the completion of the Athenry Relief Road should be a priority.</p> <p>Residential Phase 1 in Ballydavid South/Fern Hill</p> <p>The submission queries the proposal to zone lands in Ballydavid South Residential Phase 1, stating the zoning of these lands is leapfrogging other undeveloped lands. The submission notes access to subject lands via the existing estate are not adequate and development will negatively</p>	<p>zoning surrounding Athenry House has been retained. As part of the preparation of the LAP a Flood Risk Assessment was completed. It is noted the request for all of the subject lands to be zoned Open Space /Recreation and Amenity. However, this would not reflect the strategic location of the lands within the town. In order to address the future requirement in terms of commercial mixed use and residential is considered the land should be retained for those purposes in addition with the large tract of Open Space /Recreation and Amenity lands. It is therefore considered that as a result of the above the lands should remain Commercial Mixed Use and Open Space/Recreation and Amenity.</p> <p>The LTP is accompanying the LAP and as such the measures are reflected in Policy Objectives. This is a land use plan, and the specific allocation/identification of bus stop is an operational issue for the relevant statutory agencies.</p> <p>See Chief Executives Response to GLW-C60-101.</p> <p>Chief Executive’s Recommendation</p> <p><i>See Chief Executives Recommendation to GLW-C60-101 in relation to Recommendation 1 of the OPR Submission.</i></p>
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		<p>impact the amenity for the residents. The submission outlined the poor connectivity from Fern Hill, particularly for walking and cycling, and no public transport. The submission adds the consequence of increased housing density on the northeastern side of Athenry needs to be considered as further development will increase traffic volumes on the L3107, especially in the absence of the Athenry Relief Road and active travel provisions.</p>	
GLW-C60-97	Michael Scott	<p>A comprehensive submission has been received on number of themes;</p> <p>Low-rise Medium Density Housing Athenry has experienced the development of low density (under 35 units/ha) over the last two decades but has remained compact whilst preserving its medieval character. The submission suggested a Low-Rise Medium-Density Housing Model is incorporated within the LAP.</p> <p>Cycling Infrastructure The submission outlines car travel as the preferred mode of transport in Athenry. The submission stated Athenry's urban form suits active travel and indicates the implementation of active travel measures should be a priority and proposes the following to be included in the Draft LAP</p> <ul style="list-style-type: none"> • Proposed Town Walk to be open for cycling; • Pedestrian/cycle path/crossing point to Páirc Na hAbhann across the R348; 	<p>Chief Executive's Response Submission noted.</p> <p>The housing density for Athenry was adopted in the Galway GCDP 2022 - 2028 which came into effect in June 2022. As part of the midterm review of the GCDP 2022 -2028 a clearer analysis will become apparent which may warrant a revised density for Athenry</p> <p>The LTP aims to address these issues.</p>

		<ul style="list-style-type: none"> • Pedestrian/cycle bridge at the Monivea Road rail bridge; • Introduction of pedestrian/cycling permeability between estates to the north of the town, and; • Roll out of measures in line with the Safe Routes to School Initiative. <p>Lands adjacent to the Dominican Priory/Town Wall The submission welcomes the zoning of Open Space/Recreation & Amenity lands bounding the Dominican Priory. The submission notes the zoning reflects the nature of the lands (large areas within a flood zone, the 30m Zone of Archeological Potential, high-quality habitat, etc.) and the opportunity to provide a high-quality park and a green public space within the town.</p> <p>Traffic Measures The submission outlines the traffic congestion and visual impact of parking. The submission suggests a traffic and parking strategy.</p> <p>Athenry House The submission welcomes Policy Objective <i>ASP 44 Protection of Athenry House</i>.</p> <p>Town Wall Walk The submission welcomes the proposed Town Wall Walk and recommended it should be designed to accommodate cycling infrastructure.</p>	<p>See Chief Executives Response to GLW-C60-54</p> <p>Submission noted.</p> <p>Submission noted.</p> <p>Submission noted.</p>
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		<p>Building Vacancy - Collaborative Town Centre Health Check Programme (CTCHCP)</p> <p>The submission welcomes this programme to survey and establish vacancy rates in Athenry. The submission adds Athenry is on the waiting list for this initiative. The submission suggests a Policy Objective is included in the LAP to ensure this initiative is completed in the lifetime of the plan.</p>	<p>Submission noted.</p> <p>Chief Executives Recommendation <i>See Chief Executives Recommendation to GLW-C60-54.</i></p>
GLW-C60-124	Dr Ellis Ward	<p>The submission has raised two concerns regarding the Athenry LAP.</p> <p>Rezoning of Green Space at Cullairbaun</p> <p>The submission states the zoning needs to be reconsidered as the green space is used daily for recreational and functional uses. The submission notes this space is the only green area which proves connectivity between estates, schools and health centre. The green space is used by both residents and non-residents of the estate, especially children. The open space is critical to the physical and mental health of the population and the impact of its loss cannot be overestimated. The submission suggests the green area be assessed by the County Biodiversity Officer.</p> <p>Restoration and Preservation of Town Centre</p> <p>The submission notes future developments should prioritise the refurbishment of existing derelict and empty buildings in the town in advance of commercial development elsewhere. The submission adds priority</p>	<p>Chief Executive's Response</p> <p>Submission noted.</p> <p>See response to Chief Executives Response to GLW-C60-11.</p> <p>Submission noted. There are a suite of Policy Objectives contained within the GCDP 2022 – 2028 (<i>Chapter 3 Place - making, Regeneration and Urban Living and Chapter 5 Economic Development, Enterprise and Retail Development</i>) and the Draft Athenry LAP 2023 -2029 (<i>ASP</i></p>

		<p>should be given to pedestrians and cyclists in the town centre.</p>	<p><i>12 Town Centre Management, ASP 31 High Quality, Contextually Sensitive Design, ASP 38 Architectural Heritage and ASP 39 Architectural Conservation Areas</i>) which support the redevelopment and regeneration of buildings with the aim to alleviate the dereliction within Athenry Town Centre.</p> <p>Chief Executive's Recommendation <i>See response to Chief Executives Recommendation to GLW-C60-11.</i></p>
GLW-C60-100	<p>John Carroll (on behalf of Athenry Tidy Towns Committee)</p>	<p>A submission has been received by Athenry Tidy Towns Secretary discussing several themes.</p> <ul style="list-style-type: none"> • The submission has expressed concerns regarding the zoning of land in Cullairbaun estate and the loss of the green space area. The submission notes notwithstanding the need for housing in Athenry, but requests a review is conducted to outline the long-term ramifications of this proposal, looking at mitigating factors and options to minimise the loss of vital open space. • The Athenry Tidy Towns committee welcome the zoning of land from River Clarin towards the town walls to Open Space/Recreation & Amenity. The submission notes the zoning is justified due to its flood risk and development restrictions with the Town Wall's Zone of Notification. 	<p>Chief Executive's Response Submission noted.</p> <ul style="list-style-type: none"> • See response to Chief Executives Response to GLW-C60-11 above. • Submission noted.

		<ul style="list-style-type: none"> • The submission outlines explicit references that should be made in the Draft Athenry LAP 2023 – 2029 on how sustainability and biodiversity can be guarded and expanded within the town. The committee suggests a biodiversity plan should be undertaken alongside the Draft LAP. The submission suggests green areas under the control of the Council should be managed to enhance biodiversity. • The submission indicated the Draft Athenry LAP 2023 – 2029 should focus on pedestrian and cycle permeability and provides a list of current town infrastructure issues; <ul style="list-style-type: none"> i. No accessibility between Parc na hAbhainn across the R348 ii. No safe access along Caheroyn Road across the railway tracks (WC 25) iii. Provision for a safe walking path along a section of L3112 to Lady Well (WC 20) iv. Extend the Cycle Tracks & Footpath Upgrades along the Clarin River (Figure 5. WC03) to encompass a section of the river northwards, towards WC24. 	<ul style="list-style-type: none"> • Submission noted. The Local Heritage and Biodiversity Plan are currently under review with the anticipation of a new plan in the coming months. The policy objectives in the GCDP 2022-2028 supports the preparation of a Biodiversity plan. <ul style="list-style-type: none"> i. An active travel crossing of the R348 from Páirc na hAbhainn towards Athenry Shopping Centre is proposed in the Draft LTP as part of WC06; ii. Traffic calming measures and footpath upgrades on the Caheroyn Road are proposed in the Draft LTP as part of WC25; iii. Cycle tracks and footpath upgrades on the L3112 are proposed in the Draft LTP as part of WC20. Lady Well is located outside the Settlement Boundary. iv. The measures identified in the LTP are the initial proposals in relation to connectivity and permeability in the town. As this stage evolves there
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		<ul style="list-style-type: none"> The submission notes that in line with the commitment towards the development of the Strategic Economic Corridor and development of the Bia Innovator Campus, provision for safe pedestrian and cycling access to campus from town should be a priority for staff and visitors. The submission notes the use of the R348 beyond WC01 is wholly unsafe and unsuitable for this purpose. The extension of WC37 westwards on public lands would feed into the tourism potential of Athenry and open up access to the 'Field of Athenry.' 	<p>will be further opportunities to examine such as those referenced in the submission.</p> <ul style="list-style-type: none"> The Draft LTP contains proposed measure WC01 to address the issues in the submission. This will support the provision of cycleway and footway linking the Bia Innovator to existing cycling infrastructure along the relief road. There are Policy Objectives within Draft LAP and LTP to support the implementation of these measures. <p>Chief Executive's Recommendation See <i>Chief Executives Recommendation to GLW-C60-11.</i></p>
GLW-C60-10	Jim Reidy (on behalf of Athenry Tidy Towns)	<p>A comprehensive submission has been received by Athenry Tidy Towns Vice-Chair who raised a number of observations;</p> <ul style="list-style-type: none"> The submission states the boundaries of the Athenry Draft LAP coincide within the proposed Ring Road. The submission expressed concerns regarding the forecasted population growth and the future issues facing planners. The submission has suggested relocating the Ring Road to the south to include Lady's Well Road, Carnakelly Road and Monivea Road. The submission adds due to the flooding and other constraints further expansion of the town outside the ring road is required. Similar to previous plans, areas to the south of the proposed Ring Road have been zoned Residential and should be given consideration. The submission outlined most of the amenity areas are 	<p>Chief Executive's Response Submission noted.</p> <ul style="list-style-type: none"> In relation to the Athenry Relief Road and the request to realign this road, there is no mechanism for the LAP to propose its realignment. A Part 8 for this road has been permitted and the LAP reflects this alignment.

		<p>located to the south whereas most of the housing estates are to the north.</p> <ul style="list-style-type: none"> • The submission outlined their frustration with the unfinished section of the Ring Road between Tuam Road Roundabout and Monivea Road • The submission indicated the area zoned for housing in Cullairbaun should be zoned amenity with the retention of pitches and biodiversity areas. • The submission adds the area surrounding Fern Hill (Ballast Pit) is rich in biodiversity and should be retained as per Chapter 10 Natural Heritage, Biodiversity and Green/Blue Infrastructure of the GCDP 2022 – 2028. • The submission stated a Clarin River Walk should have public access for walkers and cyclists, which would help achieve the sustainability objectives of the Draft Plan. • The submission stated climate change is the most pressing issue of our generation and declares the draft plan is deficient in its approach to climate change indicating there are no innovative mitigation measures included to reduce inhabitant carbon footprint. • The submission indicated Parc na hAbhainn residents must use a car to access the town centre whilst most 	<ul style="list-style-type: none"> • Submission noted. • See Chief Executives Response to GLW-C60-11. • See Chief Executives Response to GLW-C60-101. • See Chief Executives Response to GLW-C60-54 • See Chief Executives response to GLW-C60-8.
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		housing estates have high walls around them which excludes connectivity adding to car dependency.	<ul style="list-style-type: none"> An active travel crossing of the R348 from Páirc na hAbhainn towards Athenry Shopping Centre is proposed in the Draft LTP as part of WC06; <p>Chief Executive’s Recommendation <i>See Chief Executives Recommendation to GLW-C60-11.</i> <i>See Chief Executives Recommendation to GLW-C60-8.</i> <i>See Chief Executives Recommendation to GLW-C60-54</i> <i>See Chief Executives Recommendation to GLW-C60-101 in relation to Recommendation 1 of the OPR Submission.</i></p>
GLW-C60-134	Brian Reidy	<p>This submission welcomed the publication of the Draft Athenry LAP 2023 – 2029. The submission has raised several topics to discuss.</p> <ul style="list-style-type: none"> Land zoned at Fern Hill should not be developed due to unique and sensitive biodiversity area; Requests to protect lands surround Athenry House and western Bank of Clarin River; Cullairbaun green space is rich in biodiversity. Residents have planted various native trees on the northern margin, and; Expressed concerns regarding the reduction of green space throughout the many estates north of Athenry. 	<p>Chief Executive’s Response Submission noted.</p> <ul style="list-style-type: none"> See Chief Executives Response to GLW-C60-8. See Chief Executives Response to GLW-C60-54. See Chief Executives Response to GLW-C60-101. Submission noted. <p>Chief Executive’s Recommendation <i>See Chief Executives Recommendation to GLW-C60-8.</i> <i>See Chief Executives Recommendation to GLW-C60-54.</i> <i>See Chief Executives Recommendation to GLW-C60-101 in relation to Recommendation 1 of the OPR Submission.</i></p>

<p>GLW-C60-1</p>	<p>Martin Lavelle</p>	<p>The submission raised a number of points and recommendations in relation the Draft Athenry LAP;</p> <ul style="list-style-type: none"> • Walking and Cycling Crossings; • Pedestrianisation of Town Centre; • 10m pedestrian way at burbage plots inside Town Wall, and; • Higher Densities within Town Centre, and; • Integration of heritage assets into the public realm. 	<p>Chief Executive’s Response Submission noted.</p> <ul style="list-style-type: none"> • The LAP is accompanied by an LTP. There is a suite of policy objectives both in the LTP and GCDP measures referenced in principle. • Submission noted. • Submission noted. • Chief Executives Response to GLW-C60-97 • Submission noted. <p>Chief Executive’s Recommendation <i>Chief Executives Recommendation to GLW-C60-97</i></p>
<p>GLW-C60-55</p>	<p>Gareth Mc Elhinney (on behalf of Friends of Athenry House)</p>	<p>This submission was submitted on behalf of Friends of Athenry House and raised a number of topics to discuss;</p> <ul style="list-style-type: none"> • The submission welcomes the inclusion of <i>ASP 44 Protection of Athenry House</i> which seeks to protect Athenry House while supporting its reuse. The submission also noted due to the close proximity of lands to the Clarin River, all lands around Priory and Town Walls would be more appropriately zoned Open Space/Recreation and Amenity. • The submission suggested zoning the lands around Athenry House and inside the town walls for very limited mixed-use development and/or for community 	<p>Chief Executive’s Response</p> <ul style="list-style-type: none"> • See Chief Executives Response to GLW-C60-54 <p>Submission noted. It is considered there is a suite of Policy Objectives in the Draft Athenry LAP 2023 - 2029 and the GCDP 2022 – 2028 (Chapter 12 Architectural,</p>

		<p>facilities/open space, for example creating a larger public park with supporting facilities such as a café, art gallery, museum, etc. The submission was accompanied with a map illustrating the area around Athenry House, the flood zone, and the 30m buffer from the Town Walls as the site is within the Zone of Notification. The submission stated the area west of Clarin River around Athenry House, including the National Monument (dovecote) should hopefully demonstrate just how unsuitable this area is for commercial mixed/use development.</p> <ul style="list-style-type: none"> The submission noted ASP 40 Development/Works relating to Protected Structures and Architectural Conservation Area is critical to protecting the setting and context of Athenry House. 	<p>Archaeological and Cultural Heritage) that takes cognizance of the preservation of buffer zones. However, the concerns in regard to the Town Walls is noted, and it is considered warranted that additional wording to Policy Objective ASP 43 would be proposed. See Chief Executive Response to GLW-C60-110 in relation to new policy objective.</p> <ul style="list-style-type: none"> Submission noted. <p>Chief Executive’s Recommendation <i>See Chief Executive Recommendation to GLW-C60-110 in relation to new Policy objective.</i></p>
<p>GLW-C60-110</p>	<p>Athenry Historical Society</p>	<p>This submission is in relation to the historic Town Walls in Athenry. The submission applauded how that Draft Athenry LAP 2023 – 2029 draws upon the delicate balance between sustainable 21st century urban development within what is internationally recognised as one of the finest medieval walled towns in Western Europe. The submission requested a 30m protection zone both inside and outside the town walls and a dedicated map detailing the circuit of the town wall with the 30m protection zone marked on both sides of the National Monument. The submission stated no zoning definition or zoning matrix should be included in the 30m protection zone as the purpose of this</p>	<p>Chief Executive’s Response Submission noted. It is considered there is a suite of Policy Objectives in the Draft Athenry LAP 2023 - 2029 and the GCDP 2022 – 2028 (Chapter 12 Architectural, Archaeological and Cultural Heritage) that takes cognizance of the preservation of buffer zones. However, the concerns of the Athenry Historical Society are noted, and it is considered warranted that additional wording to Policy Objective ASP 43 would be proposed as follows;</p> <p>Policy Objective ASP 43 (b) It is a policy objective of the Council to safeguard Athenry Town Wall by ensuring any development proposed</p>

		<p>strip is to preserve the wall's integrity. The submission stated that the ubiquitous term 'buffer zone' be removed in favour of the more descriptive term 'protection zone'.</p>	<p>has due recognition of this unique heritage asset within the town. Any potential proposals shall be accompanied by a visual impact assessment, archaeological assessment and architectural conservation assessment/statement in addition to relevant and applicable planning criteria.</p> <p>Chief Executive's Recommendation Additional wording to Policy Objective Policy Objective ASP 43</p> <p>Policy Objective ASP 43 (b) It is a policy objective of the Council to safeguard Athenry Town Wall by ensuring any development proposed has due recognition of this unique heritage asset within the town. Any potential proposals shall be accompanied by a visual impact assessment, archaeological assessment and architectural conservation assessment/statement in addition to relevant and applicable planning criteria.</p>
<p>GLW-C60-33</p>	<p>Nick and Maria Hitchcox</p>	<p>The submission welcomes the zoning of land Open Space/Recreation and Amenity along the Clarin River. The submission notes there is now an opportunity to develop a circular walled town trail and have a national attraction located in Athenry.</p>	<p>Chief Executive's Response Submission noted. The Town Wall Walk forms a core part of the proposed Active Travel Network in the LTP, and the potential for the route to form a complete active travel loop of the town is noted and will be considered as the LTP is amended following the LAP public consultation process. The LTP proposes for the Town Wall Walk to be an Active Travel route suitable for both walking and cycling, but design details will be decided at a project level.</p> <p>Chief Executive's Recommendation No change.</p>

<p>GLW-C60-116</p>	<p>Galway Environmental Network</p>	<p>This submission welcomed the publication of the Draft Athenry LAP 2023 – 2029. The submission has raised a number of topics to discuss.</p> <p><u>Biodiversity Action Plan</u></p> <p>The submission welcomes <i>ASP 59 Climate Change, ASP 60 Climate Change and Local Renewable Energy Sources, ASP 62 Trees, Parkland/Woodland, and Hedgerows and ASP 63 Biodiversity & Ecological Networks</i>. The submission requests to have detailed guidance concerning biodiversity. The submission requests a policy objective to be included in the Draft Athenry LAP 2023 -2029 to prepare a Biodiversity and Heritage Action Plan as in the current LAP which:</p> <ul style="list-style-type: none"> • Reviews the current state of biodiversity in Athenry; • Provides development guidelines; • Sets out a strategy for habitat restoration. <p><u>Zoning</u></p> <p>The submission welcomes the zoning of land east of the Clarin River from Commercial Mixed Use to Open Space/Recreation & Amenity. The submission support recommendations by local communities to utilise the lands for recreational and amenity space in line with ASP 23 Open Space, Recreation and Amenity and ASP 34 Green Network and the Landscape.</p> <p><u>Active Travel</u></p> <p>The submission acknowledges <i>ASP 32 Public Spaces and Streets, ASP 52 Pedestrian and Cycle Network, ASP 53</i></p>	<p>Chief Executive’s Response</p> <p>Submission noted.</p> <p>Submission noted. The Local Heritage and Biodiversity Plan are currently under review with the anticipation of a new plan in the coming months. The policy objectives in the GCDP 2022-2028 supports the preparation of Biodiversity plan.</p> <p>Submission noted.</p> <p>The LTP aims to address these issues.</p>
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		<p><i>Pedestrian Crossings, ASP 59 Climate Change</i> and suggests the following;</p> <ul style="list-style-type: none"> • Examine the level of permeability in existing neighbourhoods and increase permeability; • Green areas and Clarin River are linked via pedestrian and cycle routes. • Include a policy objective to deliver a “15-minute city” equivalent for the town the scale of Athenry, ensuring services, amenities and employment are located within that area; • Include policy objectives to reduce car dependency in the town by 50%; • Set annual targets for modal shift from private cars to active travel modes reviewed annually; • Exclude minimum car parking provisions for new developments and allow zero parking provision (in exchange for enhanced public open space, cycle and pedestrian infrastructure or contributions to public transport investment); • Include provision for all developments to require sheltered and secure bicycle storage; • Include policy objective to reduce on-street parking. <p><u>Architectural Heritage</u></p> <p>The Galway Environmental Network welcomes policy objectives <i>ASP 31 High Quality, Contextually Sensitive Design, ASP 32 Public Spaces and Streets, ASP 35 Street-Oriented Development and Responsive Frontages, ASP 36</i></p>	<p>Submission noted.</p>
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		<p><i>Views and Prospects, ASP 38 Architectural Heritage, ASP39 Architectural Conservation Areas, ASP40 Development/Works relating to Protected Structures and Architectural Conservation Area, ASP 43 Athenry Walled Town and ASP 44 Protection of Athenry House and makes the following recommendation;</i></p> <ul style="list-style-type: none"> • A policy objective to produce a design guide within the Architectural Conservation Area (ACA); • Extension of the Architectural Conservation Area to include historic workers' cottages located on Caheroyn Road 	<p>Submission noted.</p> <p>Chief Executive's Recommendation No change.</p>
GLW-C60-129	Cyril Bowman	<p>This submission is in relation to the future planning of Athenry. The creation of an urban space through the old Presentation School and Convent/ Parish ground and to continue the development through Brady's field to continue this connectivity to Old Church Street. The purpose of this is to connect the urban spaces within the railway line which otherwise may become a development barrier in the future. The growth of Galway City is inevitable, so Athenry given its position with existing infrastructure advantages will grow considerably over the next 30 years. It is important to extend the urban area southeast of the railway line for the reason stated. Furthermore, the submission stated to facilitate development, it is necessary to provide for bridge(s) over the railway which will probably become a double line from Athenry to Galway with the consequent increase in rail traffic.</p>	<p>Chief Executive's Response Submission noted. The lands surrounding the old Presentation School and Convent/ Parish grounds in the Athenry LAP 2012 – 2022 are zoned Community Facilities and Town Centre. In the Draft Athenry LAP 2023 - 2029 the lands are zoned entirely Community Facilities reflecting the existing use on site. Brady's field is zoned Town Centre and designated as an Opportunity Site in the Draft Athenry LAP 2023 - 2029 which encourages the sustainable development of underutilised sites. The Planning Authority will continue to engage with relevant stakeholders.</p> <p>Chief Executive's Recommendation No change.</p>



Comhairle Chontae na Gaillimhe
Galway County Council

Draft **Athenry Local Area Plan** 2023-2029

August 2023

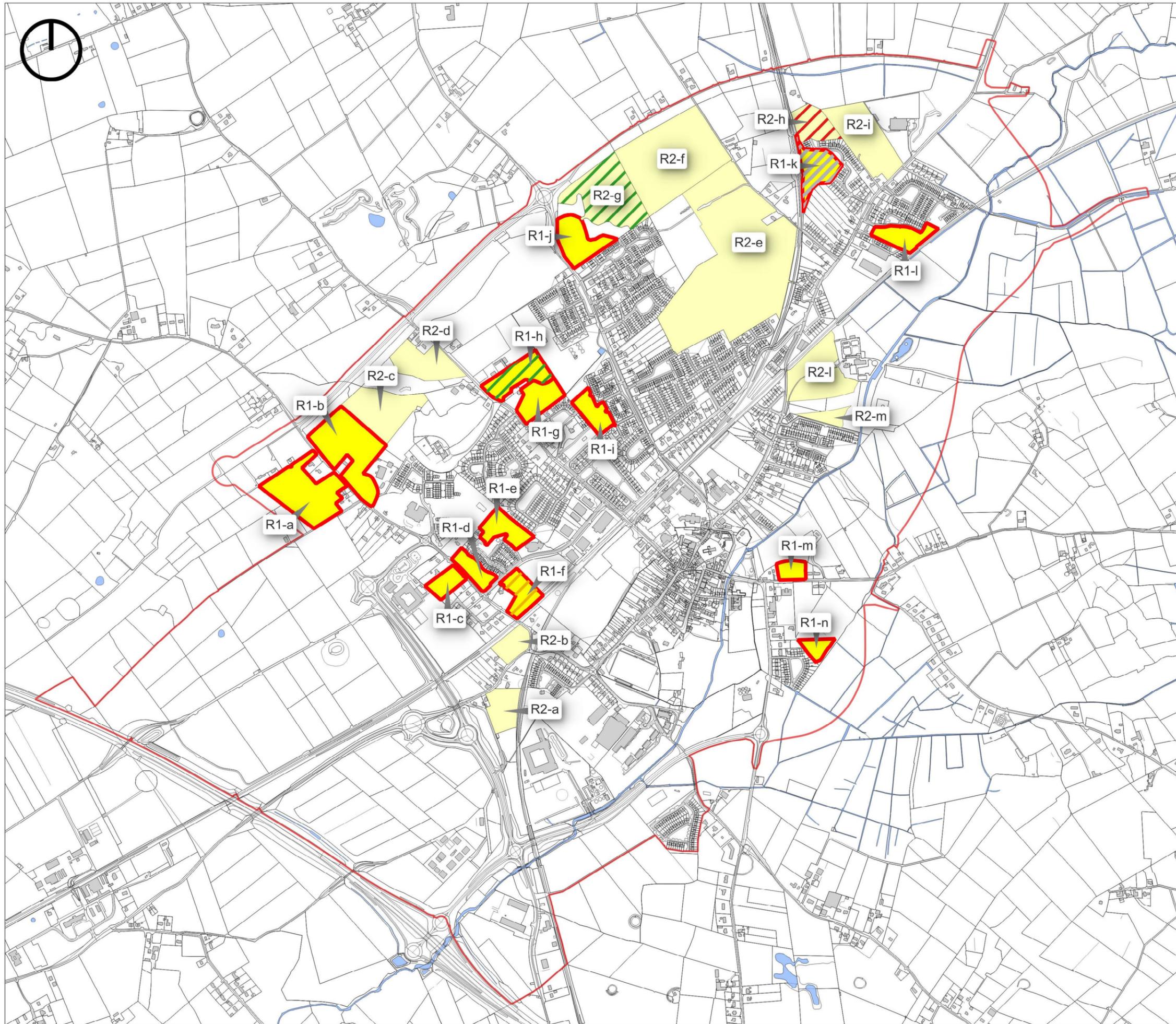
Chief Executive Report Appendices

Appendix A – Infrastructure Assessment Proposed Residential Lands

Appendix 3 of Project Ireland 2040; National Planning Framework (NPF) sets out a methodology for a two-tier approach for zoning of land which is informed by an Infrastructural Assessment, which must identify “the potential for delivery of the required services and/or capacity to support new development must be identified and specific details provided by the Planning Authority at the time of publication of both the draft and final development or local area plan”.

The NPF defines Tier 1 and 2 lands as follows; Tier 1: Serviced Zoned Land, comprising lands that are able to connect to existing development services for which there is service capacity available and can therefore accommodate new development; and Tier 2: Serviceable Zoned Land, comprising lands that are not currently sufficiently serviced to support new development but have the potential to become fully serviced within the life of the plan. It states that Tier 1 lands will generally be positioned within the existing built up footprint of the settlement or contiguous to existing developed lands and inclusion in Tier 1 will generally require the lands to be within the footprint or spatially sequential within the identified settlement. It should be noted that the NPF refers to ‘development services’ as “road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply for which there is capacity available and can therefore accommodate new development.” The NPF requires that where lands are identified as Tier 2 lands, the potential for delivery of the required services and/or capacity to support new development must be identified and specific details provided by the planning authority at the time of publication of the draft and final local area plan. This infrastructural assessment must be aligned with the approved infrastructural investment programme(s) of the relevant delivery agency(ies), or be based on a written commitment by the relevant delivery agency to provide the identified infrastructure within a specified timescale (i.e. within the lifetime of the plan). The Planning Authority may also commit to the delivery of the required and identified infrastructure in its own infrastructural investment programme (i.e. Budgeted Capital Programme) in order to support certain lands for zoning. The infrastructural assessment must include a reasonable estimate of the full cost of delivery of the required infrastructure to the identified zoned lands.).

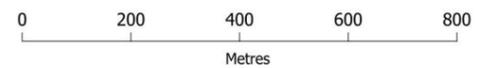
		Compact Growth	Infrastructure & Services	Physical Suitability		
		Within existing settlement Infill/consolidation Proximity to town centre Promotes sustainable mobility Access to health, education & childcare	Water Supply Wastewater Capacity Roads/Footpath/ Cycle, Surface Water	Topography Flood Risk Built & Natural Heritage	Note; This matrix has been prepared to assist the preparation of the Local Area Plan for Athenry Local Area Plan 2023-2029. The criteria listed are not considered to be exhaustive for all LAP areas.	Justification Rationale
Tier	MAP					
T2	R1A					Connection extension required for Sewer, but footpath and public lighting present
T2	R1B					Connection extension for Sewer, but footpath and public lighting present
T1	R1C					
T1	R1D					
T1	R1E					
T1	R1F					
T1	R1G					
T1	R1H					
T1	R1I					
T1	R1J					
	R1K					Proposed Change to Transport Infrastructure-CE Recommendation
T1	R1L					
T1	R1M					
T1	R1N					

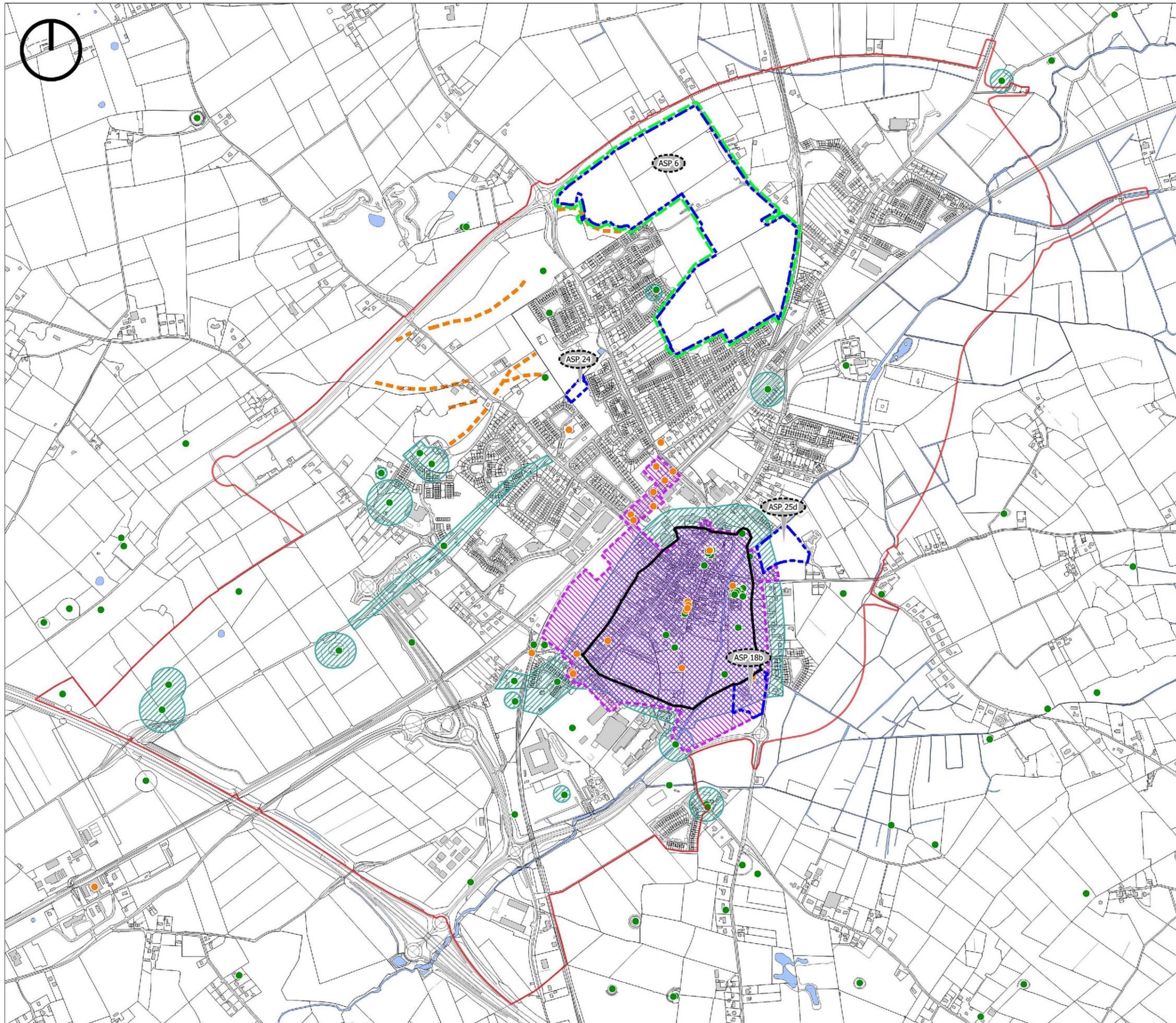


-  Settlement Boundary
-  Residential (Phase 1)
-  Residential (Phase 1) - Proposed change from Agriculture in CEs Report on Submissions to Draft Plan
-  Residential (Phase 1) - Proposed change to Transport Infrastructure in CEs Report on Submissions to Draft Plan
-  Residential (Phase 1) - Proposed change from Business & Enterprise in CEs Report on Submissions to Draft Plan
-  Residential (Phase 2)
-  Residential (Phase 2) - Proposed change from Agriculture in CEs Report on Submissions to Draft Plan
-  Residential (Phase 2) - Proposed change from Residential (Phase 1) in CEs Report on Submissions to Draft Plan

**Draft Athery Local Area Plan
2023-2029**

**Infrastructural Assessment
Proposed Residential Lands**





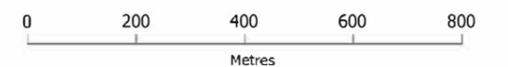
-  Settlement Boundary
-  Town Wall
-  Protected Structure
-  Architectural Conservation Area
-  National Monument
-  Archaeological Zone of Notification
-  Esker (Esker Riada)
-  Urban Framework Plan
- Policy Objectives**
-  Extent of Policy Object Area
-  Policy Objective (See below)

Objective Description

- ASP 6 Urban Framework Plan in Residential Phase 2 lands (Caheroyn).
 a) It is a policy objective of Galway County Council to prepare an Urban Framework Plan on Residential Phase 2 lands in the lifetime of the local area plan. These lands are identified on Map 2.
 b) Any proposals relating to development on lands zoned Residential Phase 2 at Caheroyn, Athenry (identified on Map 2) which are subject to compliance with Policy Objective ASP 5, shall consider as part of the Urban Framework Plan access arrangement to these lands in a co-ordinated manner, where active travel measures are the focus point for any future development.
- ASP 18b Any future development at the existing Arrabawn site on the R437 shall consider access arrangements to the Athenry Town Walls in order to facilitate permeability at this location.
- ASP 24 New Playground/Recreational Area - It is a policy objective of Galway County Council to support and encourage the development of new playgrounds/recreational areas in Athenry.

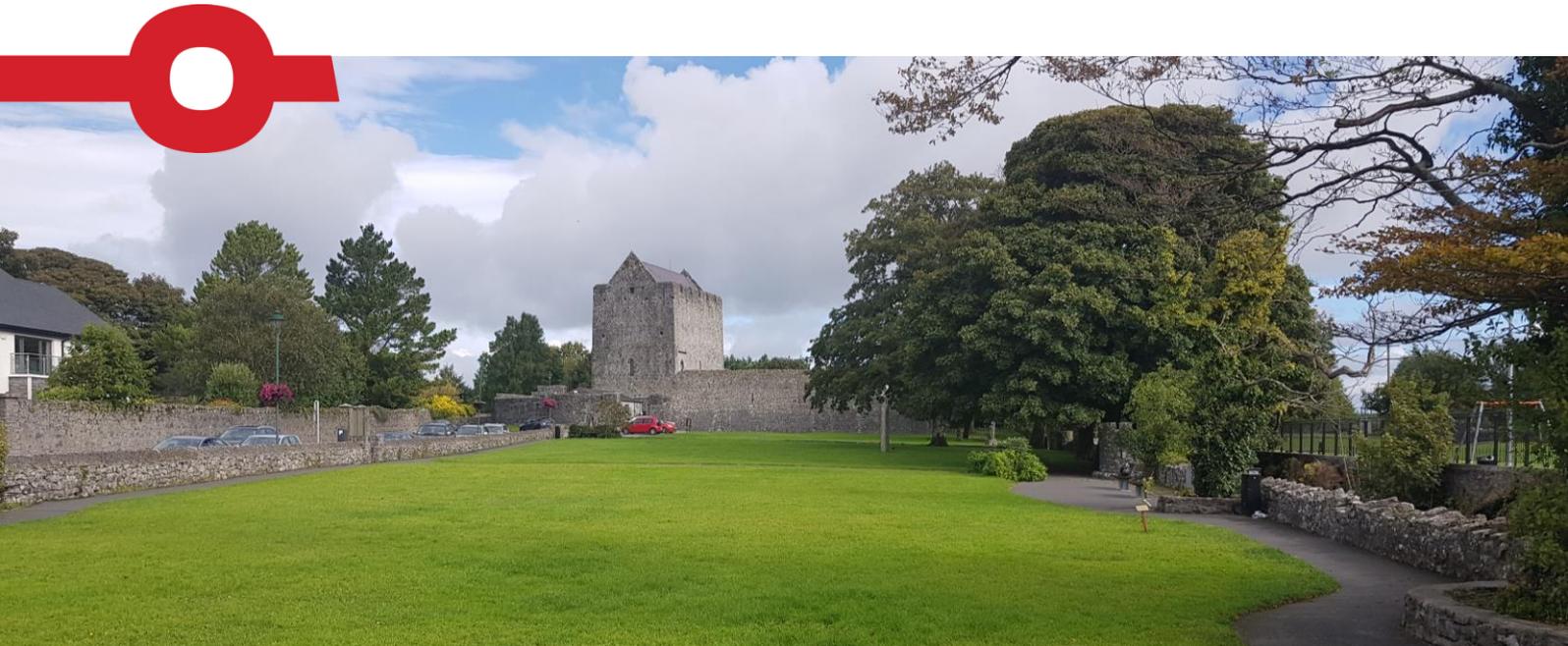
**Draft Athenry Local Area Plan
2023-2029**

**Appendix B - Map 2
Archaeological, Built, & Natural
Heritage /
Plans & Specific Policy Objectives**



**Comhairle Chontae na Gaillimhe
Galway County Council**

Appendix # – y Ó u h .
ATHENRY DRAFT LOCAL TRANSPORT PLAN



ATHENRY LOCAL AREA PLAN 2023-2029

Athenry Draft Local Transport Plan

IDENTIFICATION TABLE

Client/Project owner	Galway County Council
Project	Athenry Local Area Plan 2023-2029
Study	Athenry Draft Local Transport Plan
Date	15/08/2023
Reference number	300876
Number of pages	77

APPROVAL

Version	Name		Position	Date	Modifications
1	Authors	Ronan Fallon & Diarmuid Bailey	Consultant & Associate	07/03/2023	Draft for Client Review
	Checked by	Diarmuid Bailey	Associate	10/03/2023	
	Approved by	Andrew Archer	Director	10/03/2023	
2	Author	Ronan Fallon & Diarmuid Bailey	Consultant & Associate	15/05/2023	2 nd Version addressing client comments
	Checked by	Diarmuid Bailey	Associate	22/05/2023	
	Approved by	Andrew Archer	Director	22/05/2023	
3	Author	Ronan Fallon	Consultant	15/08/2023	3 rd Version incorporating Public Consultation Responses
	Checked by	Diarmuid Bailey	Associate Director	15/08/2023	
	Approved by	Andrew Archer	Director	15/08/2023	

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APPENDIX C – OPTION SELECTION REPORT

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1. INTRODUCTION

1.1 Overview of LTP

Galway County Council (GCC) has prepared a new Transport Study for the county alongside Local Transport Plans (LTPs) for the towns of Tuam and Ballinasloe. The Galway County Transport and Planning Study (GCTPS) has been adopted alongside the Galway County Development Plan (2022-2028).

SYSTRA Ltd (SYSTRA) has been commissioned by the Council to support the development of the GCTPS and the LTPs for Tuam and Ballinasloe. Through this work, SYSTRA has identified a range of sustainable transport measures and options suitable for the context of Galway County relating to the pedestrian, cycle, public transport and road networks. This LTP extends this process to the town of Athenry and seeks to determine how the transport needs of the town and its visitors can be met in a manner which reflects overarching national policy and builds upon the wider strategy set out in the GCTPS, as well as the Policy Objectives within the draft Athenry Local Area Plan 2023-2029 (LAP).

1.2 Study Methodology

The methodology for developing the Athenry LTP follows guidelines set out in TII/NTA’s ‘Area Based Transport Assessment (ABTA) Guidance Notes – December 2018’¹, as illustrated in Figure 1-1:

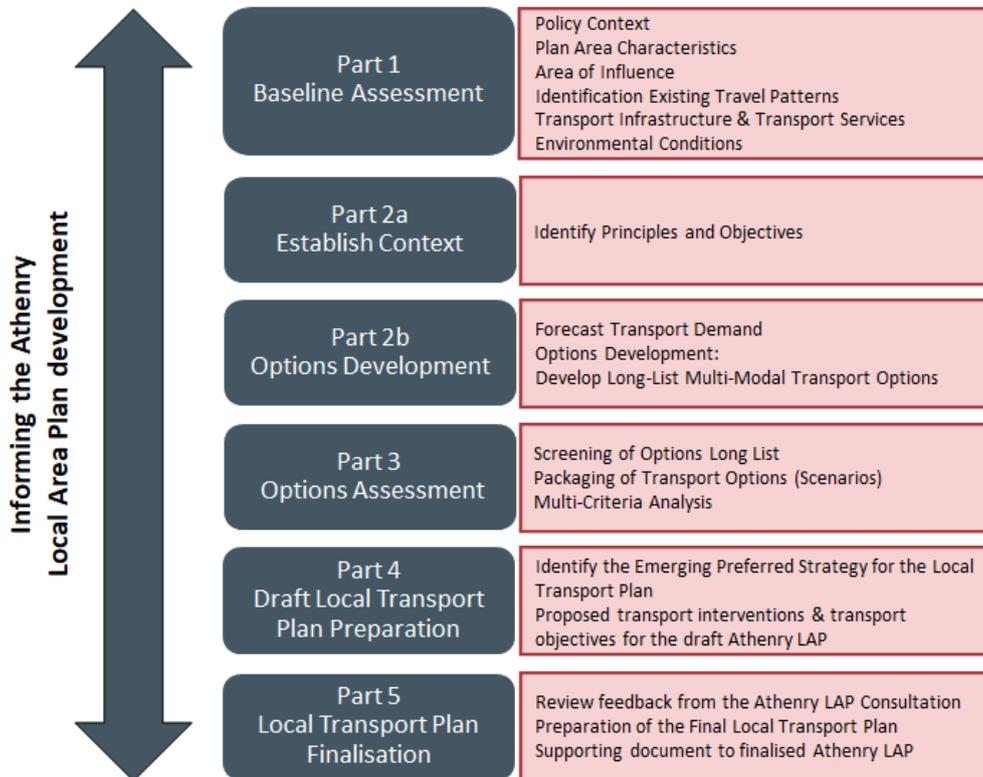


Figure 1-1: Athenry LTP Methodology

¹ Source: https://www.nationaltransport.ie/wp-content/uploads/2020/07/Area_Based_Transport_Assessment_LTP.pdf

This report covers parts 1-4 of the ABTA methodology, and provides an overview of all tasks undertaken to derive the emerging preferred strategy for the Athenry Local Transport Plan (LTP). The preferred strategy has fed transport interventions and Policy Objectives into the draft Athenry LAP for public consultation. Feedback from the consultation process will then be used to update and inform the finalised LTP for the Athenry study area.

1.3 Report Structure

The Athenry LTP report is structured as follows:

- **Chapter 2** provides an overview of existing local policies, plans and guidelines that are relevant to the study area. Background international, national, regional and county policies, plans and guidance can be found in Appendix A: Galway Policy Context Report;
- **Chapter 3** gives an overview of the Baseline Assessment phase of the ATBA, including a summary of the area characteristics, existing travel patterns and transport conditions;
- **Chapter 4** examines the objectives for the LTP which have been determined from consideration of policy, transport baseline and demand information;
- **Chapter 5** outlines the process for developing and assessing the long-list of transport options to overcome existing constraints within the study area and assist in achieving the overall study objectives;
- **Chapter 6** sets out recommendations with regard to the combination of transport measures which the LTP will seek to promote and implement (with engagement and assistance from other parties such as the NTA where appropriate);
- **Chapter 7** outlines the monitoring strategy for this LTP; and
- **Chapter 8** provides a summary and conclusion to the report.

2. POLICY CONTEXT

2.1 Introduction

The following chapter provides an overview of relevant local polices and plans, along with relevant international and national policies, plans and guidance relevant to the Athenry Local Transport Plan. The development of the LTP will be shaped by and reflect these policies

2.2 Policy Report

A technical note comprising a policy review of international, national, regional, and county level policies and plans relevant to the studies in the Galway Transport Support Programme has been compiled. This note will be used as a reference for the LTP development. An overview of the policies, plans and guidance documents reviewed for this note is presented in the table below. More detail can be found in Appendix A: Galway Policy Context Report.

Table 2-1: Background Planning and Policy Documents

International Policy
<ul style="list-style-type: none"> ○ European Union Green Deal (European Commission, 2020) and Fit For 55 Package (European Commission, 2021) ○ UN Convention for the Rights of People with Disabilities (2019)
National Policy
<ul style="list-style-type: none"> ○ Project Ireland 2040 <ul style="list-style-type: none"> ○ National Planning Framework (NPF) ○ National Development Plan 2021-2030 (NDP) ○ National Investment Framework for Transport in Ireland 2021 (NIFTI) ○ Climate Action Plan 2023 (2022) ○ National Sustainable Mobility Policy (2022) ○ Our Journey Towards Vision Zero: Road Safety Strategy 2021 – 2030 ○ Five Cities Demand Management Study (2021) ○ National Disability Inclusion Strategy (NDIS) 2017-2021 ○ Local Link Rural Transport Programme Strategic Plan 2018 to 2022 ○ Transport – Climate Change Sectoral Adaption Plan (2019) ○ Spatial Planning and National Roads - Guidelines for Planning Authorities (2012) ○ Irish Rail Strategy 2027 (2021) ○ Travelling in a Woman’s Shoes (2020) ○ Get Ireland Walking ○ Healthy Ireland: A Framework for Improved Health and Wellbeing 2019 – 2025 (2019) ○ Healthy Ireland: National Physical Activity Plan (2019) ○ Sport Ireland Participation Plan 2021 – 2024 (2021) ○ Housing for All – a New Housing Plan for Ireland (2021)

National Guidance
<ul style="list-style-type: none"> ○ Design Manual for Urban Roads and Streets (DMURS)² (2019) ○ Permeability Best Practice Guide (2015) ○ Universal Design Walkability Audit Tool for Roads and Streets ○ National Cycle Manual ○ Traffic Management Guidelines Manual (2019) ○ Greenways Guidelines & Rural Cycleway Design (Offline and Greenways) ○ TII/NTA Area Based Transport Assessment (ABTA) Guidance Notes (2018) & ABTA How to Guide, Pilot Methodology (2021) ○ Safe to School: An Ideas Document for Safe Access to School (2020) ○ NTA Safe Routes to School Design Guide (2022)
National Consultations
<ul style="list-style-type: none"> ○ Connecting Ireland Rural Mobility Plan ○ TII National Cycle Network ○ TII National Roads Strategy
Regional Policy
<ul style="list-style-type: none"> ○ Northern & Western Regional Assembly, Regional Spatial and Economic Strategy (RSES) 2020-2032 (2020) ○ Galway Transport Strategy (2017) ○ N6 Galway City Ring Road Project ○ Western Rail Corridor Financial and Economic Appraisal (2020) ○ JASPERS Project Screening Note: Western Rail Corridor Phase 2/3 (2020)
County Policy and Plans
<ul style="list-style-type: none"> ○ Galway County Development Plan 2022-2028 ○ Galway County Transport and Planning Study (GCTPS) (2022) ○ Galway County Walking & Cycling Strategy (2013) ○ County Galway Climate Change Adaptation Strategy 2019 – 2024 (2019) ○ Galway City and County Age Friendly Programme 2014 – 2019 ○ Galway County Integration & Diversity Strategy 2013- 2017

2.3 Local Policy and Plans for Athenry

2.3.1 Galway County Development Plan 2022-2028

Athenry is classified a town with strategic potential in the Galway County Development Plan 2022-2028 (GCDP 2022-2028). The development plan allocates population growth of 1,350 to Athenry over the lifetime of the plan, resulting in a target population of 5,795. This is an increase of 23% from the 2016 population stated in the CDP of 4,445.

² Works to national roads in urban areas are required to adhere to TII Publications (Standards) as well as DMURS. The TII Publication 'The Treatment of Transition Zones to Towns and Villages on National Roads' (TII Publications DN-GEO-03084) outlines design standards to be applied to national roads and national road junctions. A Design Report is required for works to national roads in accordance with TII Publications DN-GEO-03030 (Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes).

Specific infrastructural and other Policy Objectives for Athenry in the CDP are:

- To promote the upgrade of the capacity of the Athlone – Athenry – Galway rail line including the provision of a dual track and increased service stops between Galway and Athlone;
- To support the opening of the Western Rail Corridor route from Athenry to Collooney serving Tuam and Claremorris;
- Supporting active modes of travel and the implementation of infrastructure that will assist in the creation of a low carbon economy;
- Safeguarding the function of the strategic road network, ensuring the capacities are not overloaded and to include future capacities in all national road network developments; and
- In line with the Sustainable Residential Development in Urban Areas Guidelines (2009), with consideration given to pre-existing settlements, to promote in towns and villages the development of serviced lands.

2.3.2 Draft Athenry Local Area Plan 2023-2029

The draft Athenry Local Area Plan 2023 – 2029 (LAP) states its vision as:

“Athenry, a strategic potential town, which will continue to grow as a sustainable, dynamic, and inclusive community while retaining its distinct medieval character. Continued investment will enhance Athenry's potential to become an innovative growth hub within the Strategic Economic Corridor, while also providing a skilled workforce for the county. The town's growth will sustainably take place, using the sequential approach, to ensure high levels of connectivity and permeability throughout Athenry, which will, in turn, facilitate the creation of a healthy, safe, and age-friendly community”

The draft LAP document lists a number of strategic aims relevant to the Local Transport Plan, including:

- To achieve compact growth resulting in a critical mass within the Plan Area;
- To support investment in regeneration and other town centre improvement works to maintain Athenry as an attractive place to live, work and visit; and
- To encourage the promotion of sustainable mobility, including walking and cycling, under the aspirations of the LTP and support the continued provision of investment in public transport.

Among the key consideration in developing the LAP was that of the transport network: “limited availability of public transport services to date has resulted in traffic congestion in the town centre, therefore addressing deficiencies in the existing pedestrian/cycling network, promoting walk/cycling and broader Smart Travel initiatives, along with reducing car dependency, are other key considerations in the LAP process”. A specific reference to Universal Access in the design of future transport infrastructure is included in the LAP document.

In reference to the town centre, Galway County Council has a vision for:

“The plan will support a vibrant town centre that is a pleasant place for people to live, work and visit. It must be accessible to all, including those with impaired mobility. Sustainable modes of transport will be prioritised in the town centre, with good connectivity to the nearby residential and employment locations”

Specifically in relation to transport and the role of the LTP, the draft LAP highlights the GCTPS prepared as part of the GCDP 2022-2028 before outlining the vision for Athenry’s transport system. The document outlines the need to balance space allocation and the need for “greater emphasis placed on infrastructure in relation to walking, using buggies, wheelchairs or cycling”. The rebalancing of the transport system is to take place in tandem with land use planning, through the development within the existing town footprint.

2.3.2.1 Policy Objectives

To support these strategic aims, a number of Policy Objectives relevant to the LTP are outlined in Section 4 of the LAP. These policy objectives are as follows:

ASP 6 Access arrangements on Residential Phase 2 Lands Urban Framework Plan in Residential Phase 2 lands (Caheroyn):

- a) It is a policy objective of Galway County Council to prepare an Urban Framework Plan on Residential Phase 2 lands in the lifetime of the local area plan. These lands are identified on Map 2.
- b) Any proposals relating to development on lands zoned Residential Phase 2 at Caheroyn, Athenry (identified on Map 2) which are subject to compliance with Policy Objective ASP 5, shall consider as part of the Urban Framework Plan access arrangement to these lands in a co-ordinated manner, where active travel measures are the focus point for any future development.

ASP 12 Town Centre Management: “Subject to appropriate resources, noting and taking account of the Local Transport Plan, the Council in collaboration with local stakeholders shall prepare town centre management plans for Athenry.” This objectives includes consideration of connectivity, vehicular access, active travel links and car parking management.

ASP 14 Social Inclusion and Universal Design and Access: Proposals within the pan will align with the principles of social inclusion and universal design. Design decisions will give due consideration to “Disability Act 2005, the Council’s Disability Action Plan 2007-2015 (and any updates to this document), the Traffic Management Guidelines 2003, the Department of Arts, Heritage and the Gaeltacht (DAHG) and National Disability Authority (NDA) advice notes titled Access: Improving the Accessibility to Historic Buildings and Places 2011 (and any subsequent reviews/updates to these documents).”

ASP 49 Local Transport Plan: “Support the implementation of the Local Transport Plan as set out in Section 3 in accordance with proper planning and sustainable development”.

ASP 50 Transportation Infrastructure: “Facilitate the provision and maintenance of essential transportation infrastructure. This shall include the reservation of lands to facilitate public roads, footpaths, cycleways, bus stops and landscaping together with any necessarily associated works, as appropriate”.

ASP 51 Sustainable Transportation: “Facilitate any Smarter Travel initiatives that will improve sustainable transportation within the Plan Area and facilitate sustainable transportation options including public transportation, rail freight, electric vehicle rentals, car clubs, and public bike schemes, as appropriate”.

ASP 52 Pedestrian and Cycle Network: “Facilitate the improvement of the pedestrian and cycling environment and network so that it is safe and accessible to all, through the provision of the necessary infrastructure. New development shall promote and prioritise walking and cycling, shall be permeable, adequately linked and connected to neighbouring areas, the town centre, recreational, educational, residential and employment destinations and shall adhere to the principles contained within the national policy document Smarter Travel – A Sustainable Transport Future 2009-2020 and the Design Manual for Urban Roads and Streets (2013), as updated in 2019”.

ASP 53 Pedestrian Crossings: “Facilitate the provision of pedestrian crossings adjacent to schools and at other appropriate locations within the Plan Area, as required, specifically a pedestrian/cycle crossing from Athenry Rail Station and its existing parking facilities”.

ASP 54 Traffic and Transport Assessment and Road Safety Audits: “Require all significant development proposals to be accompanied by a Road Safety Audit and Traffic & Transport Assessment carried out by suitably competent consultants, which are assessed in association with their cumulative impact with neighbouring developments on the road network, in accordance with the requirements contained within the TII’s Traffic & Transport Assessment Guidelines (PE-PDV-02045) 2014 (including any updated/superseding document) and ‘Road Safety Audit’ (GE-STY-01024) December 2017”.

ASP 55 Preservation of Routes, Road Upgrades, and Infrastructure Provision: “Prohibit development on lands which are reserved for proposed road/street corridors and associated buffers and where development would affect a route, line, level or layout of any proposed new roadway or any junction required between a proposed and existing road”.

ASP 56 Reservation of Access Points: “Reserve access points for future development and the development of backlands that may be identified for reservation by the Planning Authority during the plan period, to ensure adequate vehicular, pedestrian and cycle access to backlands, to facilitate efficient development of these lands and to ensure connectivity and accessibility to lands with limited road frontage”.

ASP 57 Road Junction Improvements: “Continue to carry out road junction improvements where improvements to traffic flow and safety can be achieved, subject to normal planning and environmental considerations”.

ASP 58 Athenry Relief Road: “Facilitate the timely delivery of any improvements to the existing transportation network, including the development of new transport infrastructure and the implementation of traffic management measures subject to normal planning and environmental considerations. Where possible, there will be minimal hedgerow/stone wall removal and beneficial landscaping and planting to maintain wildlife corridors. The Athenry Relief Road has Part 8 Planning Permission and the remaining undeveloped section may be (or is likely to be) progressed during the lifetime of the Local Area Plan”.

2.3.2.2 Alignment with LTP

Proposals within this draft Local Area Plan have been integrated into the Options Development phase of the Athenry LTP, ensuring that transport options are aligned to any future changes in land use – draft LAP Land Use Zoning map outlined in Figure 4-1. Likewise, transport recommendations from the Athenry LTP have been incorporated within the draft LAP.

2.3.3 Other Relevant Local Studies

2.3.3.1 Regenerating Athenry

Regenerating Athenry is a strategy developed by Galway County Council, which aims to position Athenry as a food innovation town as well as creating liveable streets, a connected and inclusive community and maximising the town’s tourism offering.

It includes a list of projects to achieve these aims. The major project is the Bia Innovator Campus being built outside Athenry, just west of the M6, including co-working kitchens and a range of other food business related resources. To support the campus there are a number of smaller projects including an all-weather canopy in the town park for food events or markets.

A number of public realm projects are proposed, including for Market Square and Cross Street, active travel projects, and multiple projects to develop and promote Athenry’s heritage offering. In addition, there are projects to repurpose existing town centre buildings and small, community building projects.

2.3.3.2 Reimagine Athenry

Reimagine Athenry is a community led vision for Athenry’s town and its environs commissioned by Athenry Community Council and funded through a LEADER grant. It was undertaken by Dutch firm DMAU. The project sets out a future framework for the town based on the ambitions of the community, developed during public consultations and an online survey – with the final report published in January 2020.

The plan states that the “key challenge for Athenry is how to maintain its accessibility while simultaneously improving the public realm for its residents and visitors.” The plan includes a number of proposed projects, including public realm works to pedestrianise the immediate Market Square areas, a linear park/walk along the Clarin River, a Town Wall walk and a housing development on Brady’s Field.

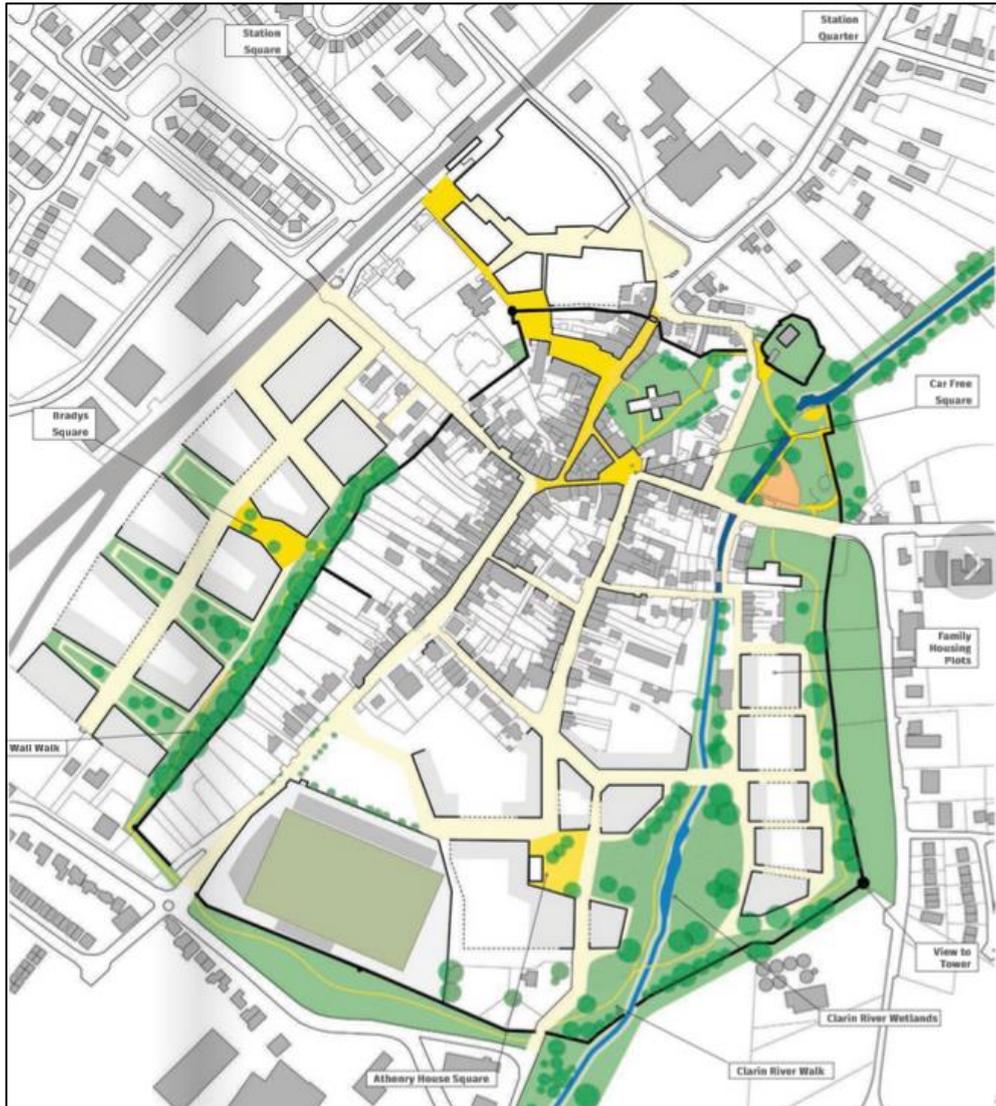


Figure 2-1: Reimagine Athenry Town Centre Vision

Further information on Reimagine Athenry can be found in the published document here: <https://www.studiodmau.com/reimagine-athenry>

2.3.3.3 Market Square Public Realm Enhancement Project

Galway County Council has embarked on a project to upgrade the public realm of Market Square, the focal point of Athenry town.

The scheme objectives are to:

- Reimagine the town centre by investing in quality of life and quality of experience;
- Improve the urban environment by creating public spaces for the community and visitors;
- Link the town centre heart to key tourist sites;
- Improve safety for vulnerable road users; and
- Improve the permeability of the town centre for greater pedestrian circulation.

Funding for the design stage of the project was secured through the Rural Regeneration and Development Fund. An options assessment process resulted in five shortlisted options presented for public consultation, ranging in ambition from maintenance of the parking bays and footpaths to pedestrianisation of the entire square as well as Davis Street and Burkes Lane. Various options for levels of parking and pedestrianisation of either Davis Street or Burkes Lane were included.



Figure 2-2: Market Square Option 5

Option 5 was identified as the emerging preferred option and is currently at preliminary design stage and scheduled for the commencement of Part 8 planning application approvals in the near future. Under this Option, Burkes Lane would be pedestrianised, parking on the square would be removed, bar a drop-off/pick-up point and a pedestrian plaza created on Market Square.

2.3.3.4 Cross Street Proposals

Proposals to upgrade Cross Street are also in preparation for a Part 8 application. It is planned to align the design with the Market Square proposals. The current design option involves the expansion of the northern footpath through narrowing of the vehicular carriageway and removal of some on-street parking spaces.

2.3.3.5 Athenry Urban Improvement Proposals

Cunnane Stratton Reynolds (CSR) Landscape Architects & Town Planners were appointed by Galway County Council to undertake a review of Athenry Town following an allocation of some funding received intended for small to medium scale urban realm improvement projects.

Interventions that largely maintained the existing street layout but with upgraded public realm and materials were recommended for Old Church Street, Market Square, North Gate Street, Tuam Road, Athenry Castle, Community Park, Cross Street and Backlawn Car Park. While these projects would improve the public realm in Athenry, they would have minimal effect on the transport network. The current proposals for Market Square and Cross Street go further in reducing car parking and reallocating space to pedestrians and urban realm improvements.

2.3.3.6 Safe Routes to School Draft Delivery Plan

A draft outline delivery plan for Safe Routes to School (SRTS) interventions in Athenry was developed by the SRTS team in An Taisce during 2022, in partnership with the schools, the NTA and Galway County Council. Two schools are included in the plan: Scoil Chroí Naofa and Athenry Boys National School.

The plans contain concept designs of interventions to improve infrastructure both directly outside and on the routes to the schools, with the aim of increasing the number of children who walk, cycle or scoot to school. The proposed interventions will require further work including detailed design, and input from stakeholders such as landowners and the local community. Some interventions may require planning permission.

Proposed interventions for Scoil Chroí Naofa include an improved walkway through the school campus, front of school School Zone treatment on Court Lane and Church Street, as well as a junction upgrade on Tuam Road and the provision of new pedestrian crossings.

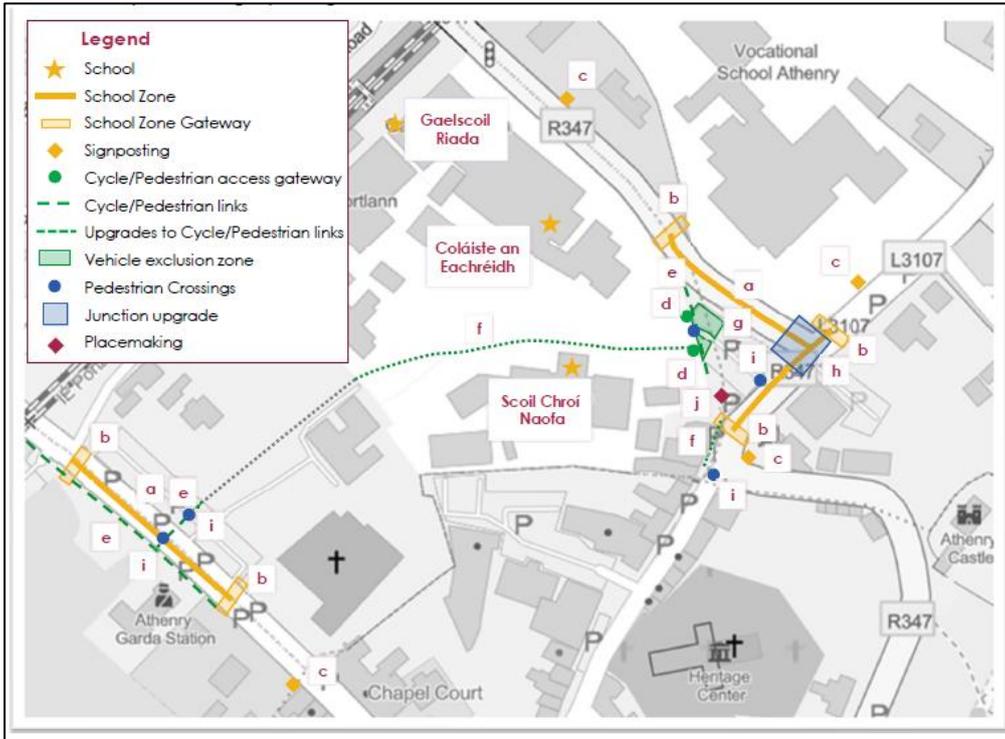


Figure 2-3: Proposed Safe Routes to School Interventions for Scoil Chroí Naofa

Proposed interventions at Athenry National School include a junction upgrade at Bridge Street, School Zone treatment and improved footpath provision outside the school.

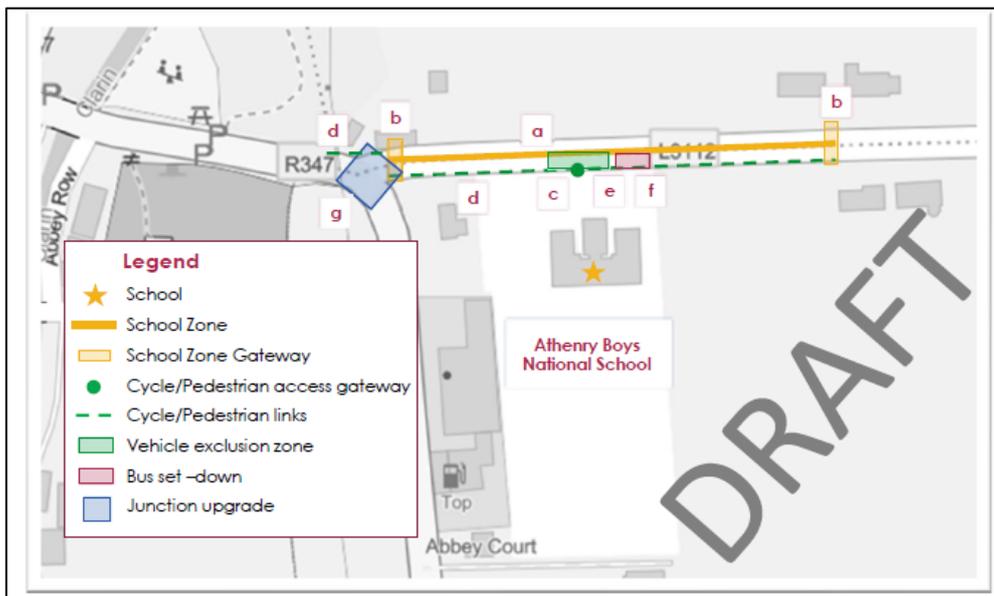


Figure 2-4: Proposed Safe Routes to School Interventions for Athenry Boys National School

There are a number of other proposed interventions across Athenry focused on providing Safe Routes to School for students in the town. These include a number of new permeability links from housing estates, a pedestrian crossing of the railway line on Church Street, the provision of “park & stride” sites

for school drop-offs and making Court Lane one-way for motor traffic to provide pedestrian improvements at this pinch point.

2.4 NTA's Rapid Build Active Travel Facilities Advice Note

In response to the tension between increasing construction costs and the Climate Action Plan requirement for 1,000km of new active travel infrastructure to be built by 2025, the NTA issued an advice note in February 2023. This note outlines that Cost Effective Rapid Build construction approaches, including road space reallocation, are now required to be the initial options to be considered in new active travel infrastructure.

Rapid Build active travel facilities are schemes that utilise cost-effective measures to deliver walking and cycling infrastructure quicker than traditional (full build) construction methods. They do not typically involve major construction works such as full road reconstruction or significant changes to drainage systems or relocation of utilities etc., however they may involve changes to kerb lines and minor drainage works. The works will also be typically within the boundaries of the existing roadway which can simplify the planning process, which positively effects project programme and delivery.

Rapid Build Schemes do not have to mean bollards, although using bollards to reserve road space for walking and cycling can be a useful interim measure. There are design options available for rapid build projects which use robust materials, with a quality finish, that produces schemes that can remain in place for many years.

2.5 Summary

- A technical note comprising a policy review of international, national, regional, and county level policies and plans relevant to the studies in the Galway Transport Support Programme has been compiled and is available in Appendix A.
- Athenry is classified a town with strategic potential in the GCDP 2022-2028, and allocated population growth of 1,350 people or 23% on 2016 levels.
- The GCDP 2022-2028 includes a number of specific infrastructural Policy Objectives related to the rail line through Athenry, including policy to support dual-tracking of the line between Galway and Athenry, and the reopening of the Western Rail Corridor between Athenry and Collooney serving Tuam and Claremorris.
- The GCDP 2022-2028 includes a number of specific infrastructural Policy Objectives related to transport including the completion of the Athenry Relief Road, provision of an integrated public transportation hub close to the railway station, an “amenity cycleway/pathway” along Cashla Road, a River Clarin Walkway and long stay car parking an Backlawn and Knockaunglass.
- Both the GCDP 2022-2028 and draft Local Area Plan include Policy Objectives to promote the use of sustainable transport in place of the private car in the town including the provision of active travel infrastructure and facilities, appropriate traffic management and compact growth.
- A number of other local plans for Athenry were also examined, including the council's Regenerating Athenry plan, the community developed Reimagine Athenry plan, plans for public realm enhancements for Market Square and Cross Street, and the draft Safe Routes to School Delivery Plans developed for Scoil Chroí Naofa and Athenry Boys National School.

3. BASELINE ASSESSMENT

The following chapter provides an overview of the Baseline Assessment undertaken for the Athenry LTP. The aim of the Baseline Assessment was to gain a clear understanding of the existing spatial characteristics, land uses, transport conditions and constraints relating to the Plan area. Further detail is provided in the full Baseline Assessment Report in Appendix B.

3.1 Description of Study Area

The study area boundary for the Athenry LTP has been identified in collaboration with Galway County Council. It broadly aligns with the LAP boundary, containing the established town and surrounding areas earmarked for development and buffer zones. A ‘best-fit’ selection of Census Small Areas (CSAs) has been identified to form the study area for the purpose of undertaking baseline analyses of census data.

Located approximately 20km to the east of Galway City, Athenry constitutes Galway’s sixth largest town with a population of 5,023 persons as of 2016 (Census 2016). The previous census in 2011 put the population at 4,570, representing an increase of 9%.

Athenry hosts 1,631 jobs and is a strategically located urban centre benefitting from a well-established road network. The M6 links Athenry to Galway City westward and eastward toward Ballinasloe, Athlone and Dublin. The town is served by the regional roads R348, R347 and R346 connecting to Tuam, Craughwell, Oranmore and Ballinasloe. Athenry railway station is located on Church Street in the town centre, providing accessibility to the Dublin–Galway and Galway-Limerick lines with onward connections to Cork and Belfast.

Athenry town serves a rural hinterland as a market town and service centre. It serves a particularly large education catchment, with over 2,000 school places in Athenry. The main attraction of the town is Market Square and the commercial core of Church Street, Old Church Street, Cross Street and North Gate Street. There are several structures of historical importance including the Dominican Priory, Athenry Castle, the St Mary’s Collegiate Church ruins, the market cross and the historic walls that encompass the town.

3.1.1 Trip Generators and Attractors

To present the concentration of local trip generators and attractors in Athenry, maps of the town’s distribution of population and employment density by 2016 Census Small Area have been generated and are shown below in Figure 3-1 and Figure 3-2.

The analysis has been derived from Census Small Area Population Statistics (SAPS) data along with 2016 Place of Work, School or College - Census of Anonymised Records (POWSCAR) data. The POWSCAR database includes a range of information on travel patterns for trips to work and school as recorded in the Census³. This data was used to identify the total number of destination work trips for each of the Census Small Areas (CSAs) within the Athenry LTP study area.

Population

Figure 3-1, below, illustrates the population density for CSAs within the Athenry study area (represented as population per square kilometre). The results indicate that the most densely

³ Further information on POWSCAR is available on the CSO website at:

<https://www.cso.ie/en/census/census2016reports/powscar/>

populated areas of Athenry are the residential estates along the R347 and in Ballydauid to the north. There are also highly populated (but not as dense) residential areas surrounding the train station and the town centre.

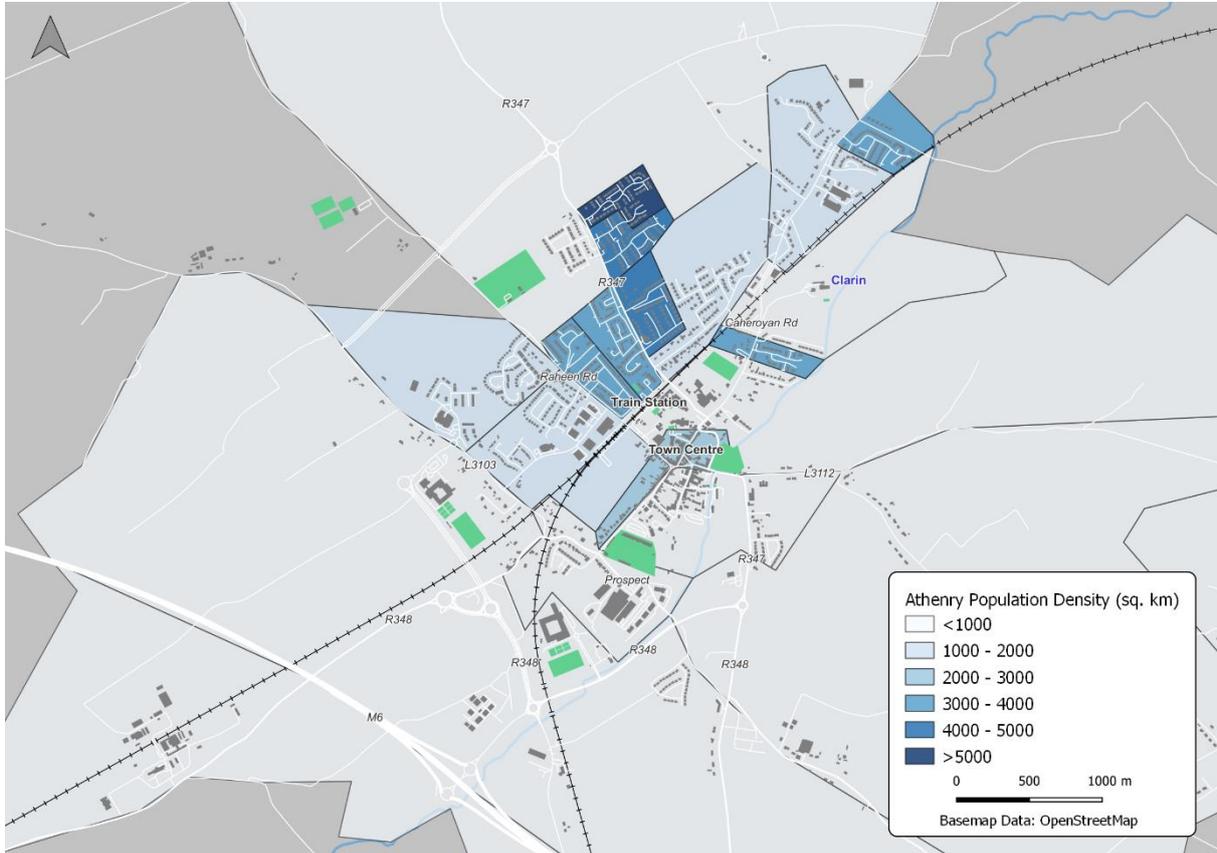


Figure 3-1: Athenry Population Density

Employment

Figure 3-2 illustrates the employment density for CSAs within the Athenry study area (represented as jobs per square kilometre). The results indicate that the town centre is the largest attractor of employment trips within the study area.

The northeast of the study area attracts a large number of work trips, an area featuring Galway and Roscommon Education Training Board (GRET B) and the railway station. Other key employment destinations in the town include Arrabawn, Mullins Construction and Raheen Industrial Estate.

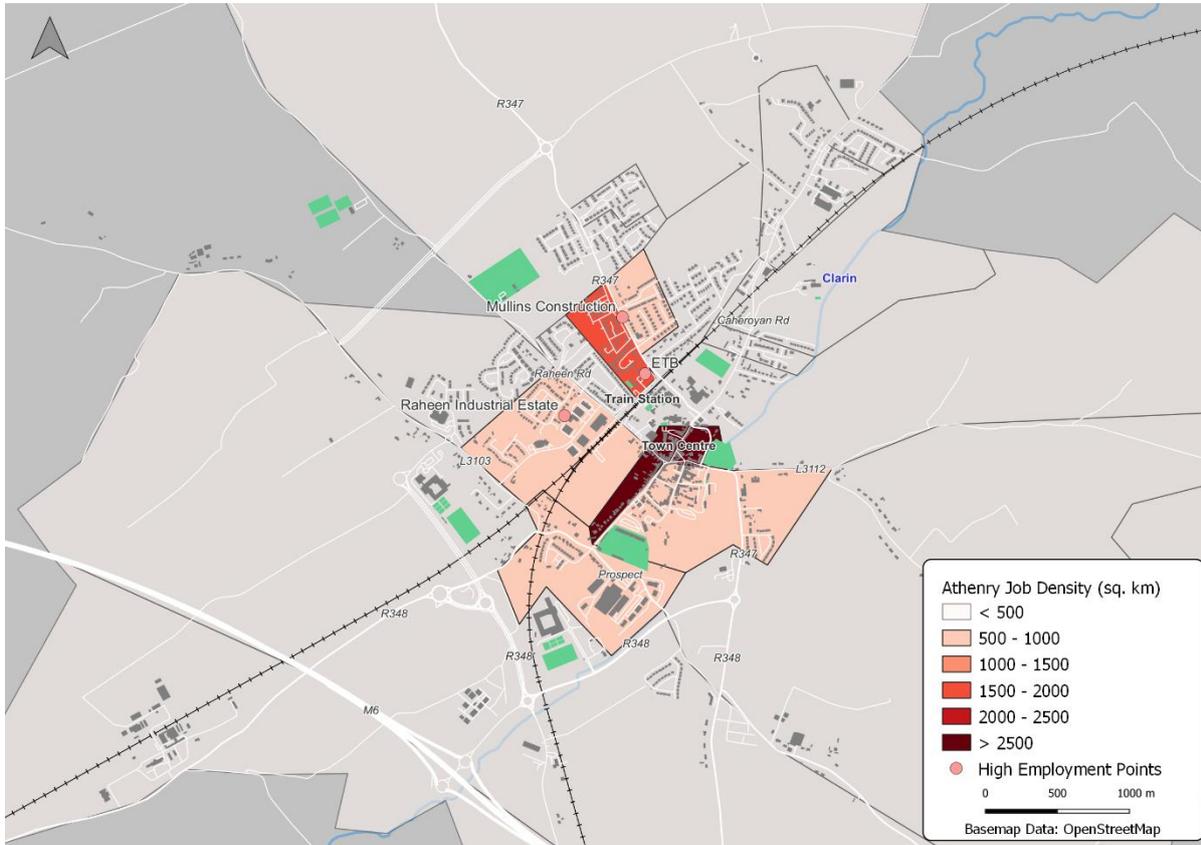


Figure 3-2: Athenry Employment Density

3.1.2 Services and Amenities

The location of key services and amenities within Athenry are presented in figure 3-3:

- Within Athenry, there is a clear concentration of services within the town centre including multiple schools, the Church of the Assumption and main shopping streets.
- The rail station is located on Station Road, just to the north-west of the town centre.
- The main primary schools in Athenry are located in the town centre on Court Lane/Tuam Road. A third primary school, the Boys National School is located close to Community Park on the L3112. The recently developed new campuses for both Clarin College and Presentation College post-primary schools, catering for nearly 2,000 pupils between them, are located in the South-West of the study area near the M6.
- Athenry Primary Care Centre is located in the centre of the study area, west of the town centre on Raheen Woods Road.
- The main supermarket in Athenry is Tesco (recently Joyce's) in the Athenry Shopping Centre complex to the south of the study area, which has buildings centred on a large amount of parking. The complex has a number of other shops and services. Other shops and services in the town are located in the town centre in the area stretching from Kenny Park to the North Gate. In addition, Aldi are currently building a supermarket off Cross Street/Clarke Street.

- The main car parks in Athenry are located around the town centre, at Backlawn, Tuam Road, North Gate Street and at the train station. Additional public parking facilities are available on-street on many streets within the town centre and in Market Square.



Figure 3-3: Athenry Services and Amenities

3.2 Demographic Profile

To better understand the profile of residents in the Athenry LTP study area, and their travel patterns, this section presents data extracted from the 2016 Census Small Area Population Statistics (SAPS) dataset. It summarises information on the proportion of residents travelling to work and school, as well as high level information on age, gender, and car ownership.

Total Population

As shown in Table 3-1 below, the Study area has an estimated population of 5,023 according to the 2016 Census⁴. This represents a population growth of 9% compared to the 2011 Census (4,570), which is a higher growth rate than seen nationally (3.8%). The GCDP 2022-2028 targets a population increase of 1,350 persons for Athenry during the plan period.

Table 3-1 also outlines the age profile of residents in Athenry. The results indicate that the Athenry LTP study area has a lower proportion of residents over the age of 65 than both the Galway County Area

⁴ As outlined in Section 3.1, the Athenry LTP study area broadly aligns with the LAP boundary but has been derived from a 'best-fit' selection of Census Small Areas to facilitate ease of analysis of baseline Census data.

and the national average. Approximately 28.3% of the study area population are under the age of 18, a higher proportion than both the County Area and the national average.

Table 3-1: Athenry Population Structure by Age

LOCATION	POPULATION 2016	0-15	16-64	65+
Athenry	5,023	28.3%	61.6%	10.0%
Galway County	179,390	24.0%	61.4%	14.5%
National	4,761,865	22.4%	64.2%	13.4%

Employment & Education

Table 3-2 outlines the number of employed people and number of jobs within the study area. As can be seen below, the number of jobs is lower than the number of employed people, resulting in a Job Attraction/Employed ratio of 0.66.

This compares to a ratio of 1.2 for Galway City and 0.5 for the rest of Galway County, highlighting the attractiveness of the city as an employment destination. The ratio in the study area results in a net flow of employed people leaving the study area for work.

Table 3-2 also outlines the number of education attractions within Athenry. With 2,321 students commuting to schools within the study area, compared to 1,428 workers and a study area population of 5,023, it shows the prevalence of school trips entering the area.

Table 3-2: Athenry Employment Opportunities

LOCATION	EMPLOYED PEOPLE LIVING IN THE AREA	JOB ATTRACTION OF THE AREA	RATIO (JOB ATT/EMPLOYED)	PUPILS / STUDENTS
Athenry	2,161	1,428	0.66	2,321
Galway City	34,951	42,062	1.20	25,494
Rest of Galway County	75,116	37,325	0.50	33,068
National	2,006,641	1,468,093	0.73	982,185

3.3 Environmental Conditions & Physical Constraints

The following environmental conditions are of note within the study area:

- The town is generally quite flat, although it rises towards the relief road, while the surrounding greenfield land within the study area is generally hillier, rising again towards Monvia and Attymon. The flat nature of the town core is beneficial for active travel.
- Part of Esker Riada ('the Great Way' a strategic early route-way on a gravel esker that once stretched from Dublin to Galway) is located on the south eastern and northern fringes of the study area boundary.
- The River Clarin runs south-easterly through the town, continuing onwards before running into Galway Bay at Clarinbridge.
- A review of the Archaeological Survey of Ireland shows that there are a large number of entries in Athenry on the Sites and Monuments Record and the National Inventory of Architectural Heritage in Athenry, as would be expected given its Medieval history. A number of structures at the railway station are listed and the site of the Dominican Friary and St Mary's Church also feature heavily. Also recorded are Athenry Castle, the corn mill, market cross and a number of buildings on Cross Street and surrounding Market Square.

There are also a number of physical constraints to transport in the study area, in particular the railway line and the River Clarin.

The railway line passes through the centre of the study area, causing considerable severance. There are only two railway crossings in the centre of the town, on the Tuam Road (railway bridge) and Church Street (level crossing). There are also four additional railway crossings on the outskirts of the town traversing the Galway rail line (comprising two railway bridges and two level crossings), three crossings of the Limerick line (two bridges, one level crossing) and three crossings of the Tuam line (one road overbridge, one road underbridge and one level crossing). Given most of the residential areas in the study area are north of the railway and most attractors (schools and shops) are to the south, the railway line causes considerable barriers to movement within the town aligned to desire lines.

The River Clarin runs south-easterly through the town, to the east of the town centre. The main central river crossing is on the R347. Given the river's easterly location, it is less of barrier to movement than the railway line, with the vast majority of development in the study area located to the west of it. There are two major crossings of the River, on Bridge Street and Prospect as well as multiple crossings by new M6 link roads. It does however require people travelling from or along the Caheroyan Road to come through the town centre or circle around the town via the relief road in order to access Athenry Boys National School and other trip attractors located along the R347 due to the lack of river crossings north of the R347. Any future development east of the river will require consideration of this barrier.

3.4 Existing Travel Patterns

3.4.1 Trip Distribution Profile

The POWSCAR database was analysed to identify the distribution of employment trips travelling to/from the study area in the AM period. Results are presented in Table 3-3, 3-4 and 3-5 below.

Table 3-3: Trip Pattern Summary

TRIP TYPE	TRIP PURPOSE	NUMBER OF TRIPS
Internal trips within the Study Area	Work	506
	School	800
	All	1,306
Inbound trips from outside towards the Study Area	Work	2,172
	School	1,639
	All	3,811
Outbound trips from the study area	Work	2,123
	School	419
	All	2,542

The Tables below show the trip distribution for AM employment trips to and from the study area. There are 1,306 trips that both start and end within the study area, which represents 34% of all trips originating in the study area, and 26% of trips travelling to the study area.

For more detailed results of the geographic distribution of trips to/from the study area, surrounding areas have been grouped into sectors. Insofar as possible, these sectors have been designed to align with the main transport corridors to/from Athenry. For example, trips to/from the “West” sector will mainly be along either the M6 or the Galway-Dublin rail line, and trips to/from the “North” sector will mainly be via the M17. The results of the sector distribution analysis are illustrated in the figures below.

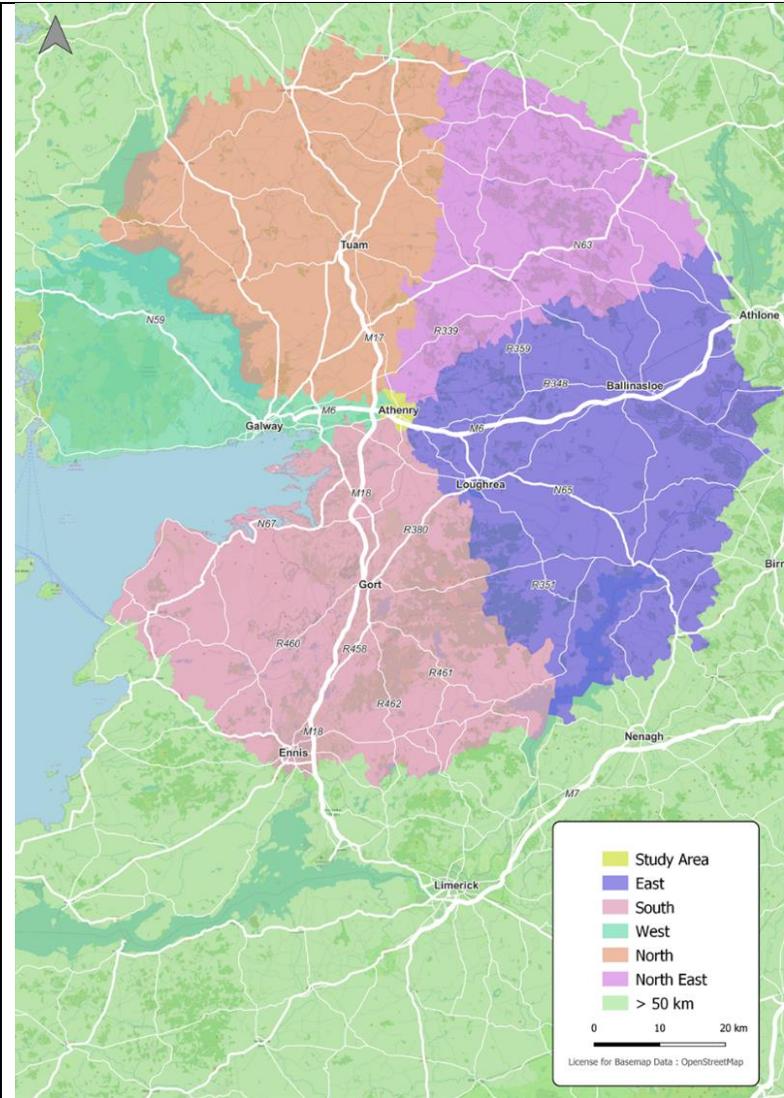


Figure 3-4: POWSCAR Sector map

Table 3-4: Destination of Athenry Origin Trips

DESTINATION	WORK	EDUCATION	TOTAL	%
Study Area	506	800	1,306	34%
East	138	37	175	5%
South	118	16	134	3%
West	1,371	262	1,633	42%
North	228	40	268	7%
North East	56	12	68	2%
> 50 km	212	52	264	7%
Total	2,629	1,219	3,848	100%

Table 3-5: Origin of Athenry Destination Trips

ORIGIN	WORK	EDUCATION	TOTAL	%
Study Area	506	800	1,306	26%
East	442	264	706	14%
South	336	476	812	16%
West	462	161	623	12%
North	424	482	906	18%
North East	298	244	542	11%
> 50 km	210	12	222	4%
Total	2,678	2,439	5,117	100%

Key findings

As can be seen in the tables above, while 34% of combined work/education trips start and end in the study area, this breaks down to 65% of education trips and only 19% of work trips.

Over 80% of work trips originating in the study area have external destinations. The most significant external destination for trips from the study area is the western sector which encompass Galway City, with 1,633 trips. A majority of work related trips, 56%, and 42% of combined work/education trips from the study area are in the direction of Galway City.

86% of education trips either stay in the study area or head towards Galway City. Therefore, the M6 and Galway-Dublin rail line are the most important outbound routes for Athenry commuters.

The second most significant external sector for outbound trips from Athenry is the Northern sector towards Tuam along the M17, with 268 trips. These three sectors (Study Area, West and North) account for 83% of trips from the study area, the remaining trips are spread between the south, east and north east. Trips greater than 50km account for 7% of trips.

For trips travelling to the Study Area, the travel patterns are more varied. Internal trips within the Study Area represent 26% of work and school related travel to Athenry. Roughly equal numbers of trips come from the surrounding East, South, West, North and North-East sectors, between 11% and 18%.

Flows towards Galway are mainly tidal with the West sector accounting for 42% of outbound AM trips but only 12% of inbound trips. The effect of the large secondary schools in particular in Athenry is apparent in the figures, with only 33% of education trips originating within the study area. Over 1,600 education trips to Athenry begin outside the study area. Few trips greater than 50km in length are made to Athenry for work/education, at only 4% of trips.

3.5 Mode Share

SAPS data provides information from the census on the typical mode of transport used for travelling to work and education. This data was used to identify the proportion of trips originating within the study area which are made by walking, cycling, public transport and car.

3.5.1 Employment Trips

The figure below illustrates the mode share for trips to work originating within the study area by walk, cycle, public transport and car (including drivers, passengers, vans and lorries), and also compares the study area mode share to the Galway County average as a whole, Galway city and nationally.

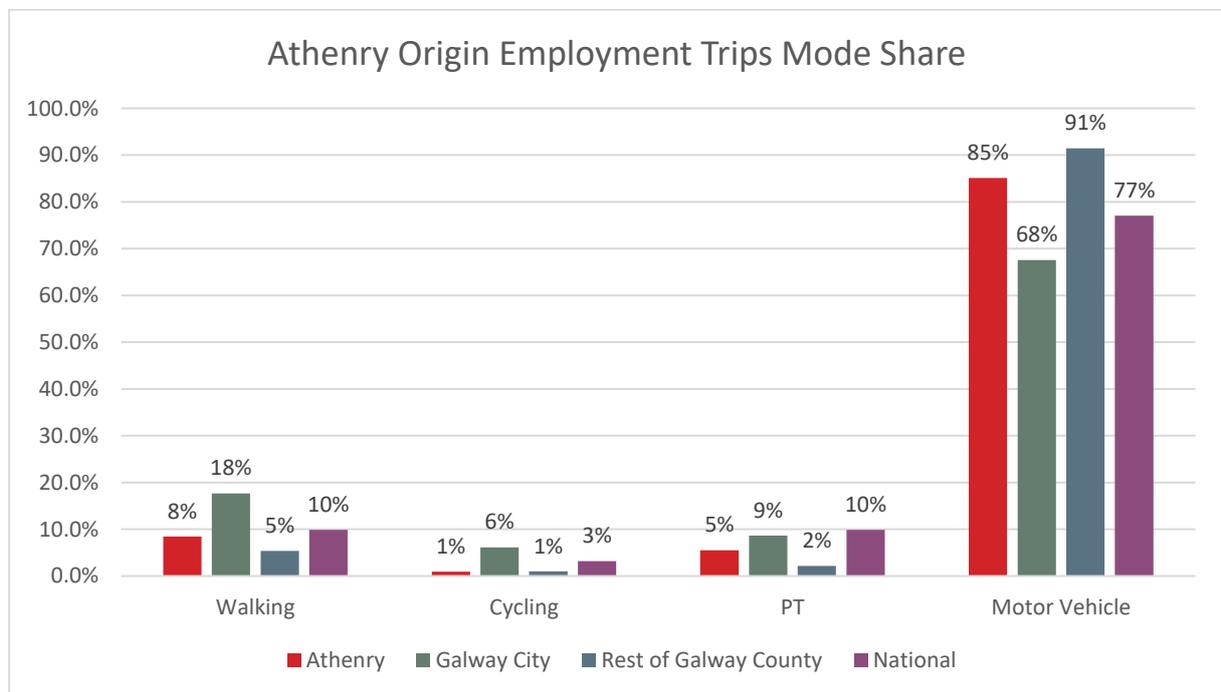


Figure 3-5: Employment Mode Share

Key findings observed from the mode share data for employment trips in the study area include:

- Approximately 9.5% of commute trips originating in the study area are undertaken by active modes. Walking trips form the majority of these and are lower than the national average. Cycling accounts for just 1%, far less than the national average but on par with the County average (with Galway City excluded).
- Public transport represents only 5.5% of commute trips, just over half of the national average, but more than twice the County average (with Galway City excluded).
- The private car is the dominant mode of transport for work trips from the study area at 85.1%, compared to the national average of 77.0%. Despite its urban form, the commute car mode share is only slightly lower than the county average of 91.5

3.5.2 Education Trips

Figure 3-6 below illustrates the mode share for trips to education originating within the study area.

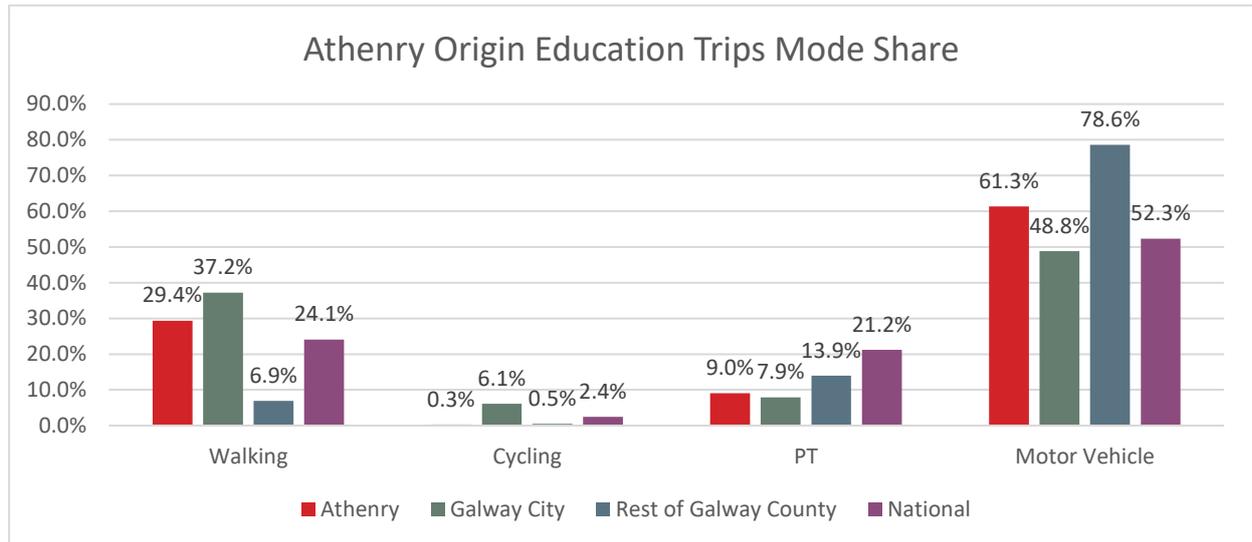


Figure 3-6: Education Mode Share

The key findings for education trips include:

- The overall mode share for active travel (walking and cycling) to education is 29.7%, slightly higher than the national average (26.5%), and significantly higher than the county average of 7.4% (excluding Galway City) showing the advantages of the study area's urban form.
- Cycling mode share is well below the national average (0.3% vs 2.4%)
- Public transport mode share is 9%, significantly below the county average of 13.9% (excluding Galway City).
- Overall, car is still the dominant mode of transport for education-related trips, accounting for 61.3% of all journeys, compared to a national average of 52.3%.
- Car trips are predominantly concentrated in areas further from Athenry schools, however, there are still a sizeable number of car trips within the study area that are within a reasonable walk or cycle.

3.6 Trip Length Distribution

Analysis was undertaken to determine the trip length distribution by mode for education purposes from 2016 POWSCAR data. This was used to establish the typical trip lengths, and modes used, for journeys by residents of the study area and help identify where opportunities might exist to further support a shift away from the private car and onto sustainable modes.

Figure 3-7 below outlines the trip length distribution by mode for all education trips travelling to schools within the study area.

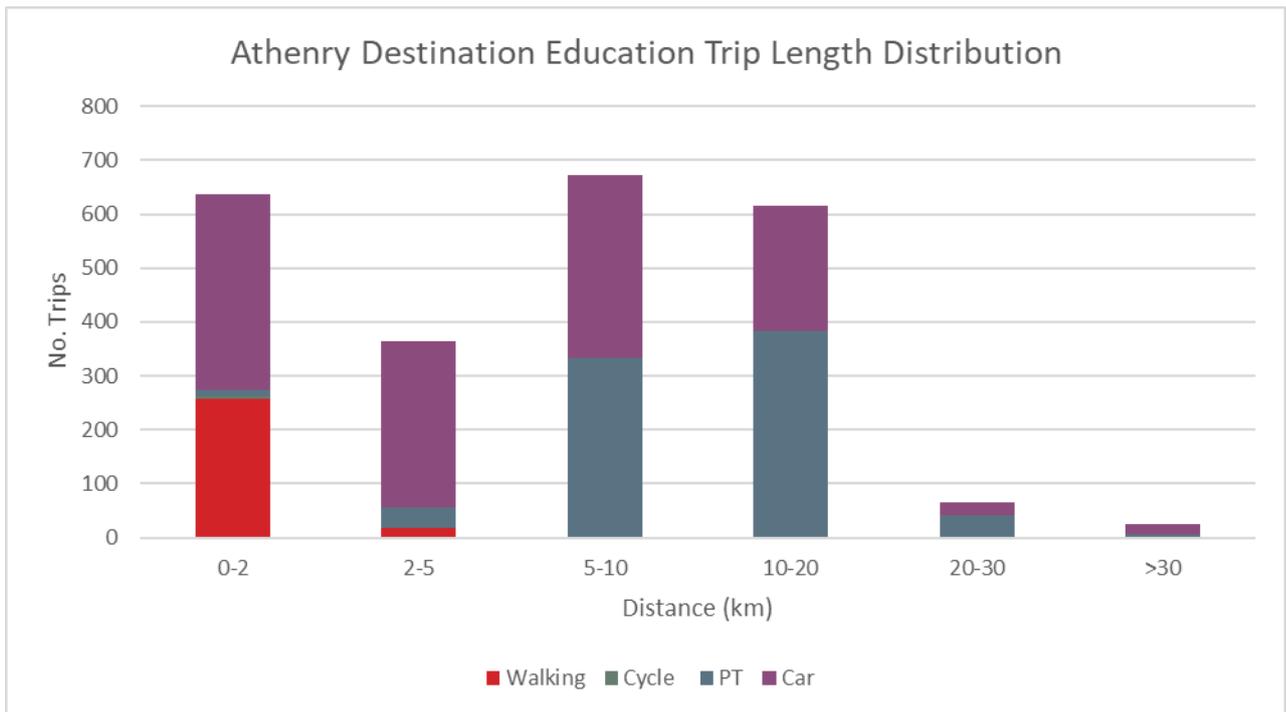


Figure 3-7: Education Trip Length Distribution (Trips to work in Athenry), by Mode [POWSCAR, 2016]

Key findings:

- A majority (55%) of longer distance (>5km) education trips are made by public transport.
- There are a significant number (707) education trips longer than 10km coming to Athenry.
- A majority of trips to school under 2km (57%) are undertaken by car.
- Trips to education in Athenry are generally shorter and therefore more suited to active travel than employment trips.

There is a general association between trip length and mode choice. For example, at shorter distances the average person may be willing to walk or cycle to access goods, services or employment. However, as trip lengths increase, these modes become less attractive.

Similarly, short distance trips by public transport may be unattractive compared to alternative modes as the wait time would be a significant proportion of overall journey time.

In terms of distance, trips can be broken down into:

- Short – generally serviceable by walking or cycling
- Medium – generally serviceable by cycling (including eBikes), public transport or car; and
- Long – generally serviceable by public transport or car.

The significant proportion of education trips in Athenry under 10km, and particularly under 5km and 2km, provides an opportunity to shift car trips to active travel given the right package of measures. For trips over 10km, public transport options may be competitive to the car for certain trips patterns. Insofar as is practicable, a public transport option should be provided for these longer trips for social equity reasons even where journey time competitiveness is challenging.

3.7 Access to Education (ATOS Tool)

3.7.1 Introduction to ATOS

Access to Opportunities and Services (ATOS) is a measure of how easy it is to access key services and employment by walking and cycling. In developing the ATOS tool, the National Transport Authority (NTA) have followed a methodology established by Transport for London and adapted it to make it more suitable for use outside of large metropolitan areas.

The ATOS tool has been run for access to primary and post-primary schools within the study area by walking and cycling. For this analysis, the defined criteria was the ability to access any primary school (at least one) and any post-primary school within a 15 minute walk and 15 minute cycle. The scoring for each grid is then determined by how the travel time compares to the average travel time for all squares that have access to a primary/post-primary school within the specified timeframes.

It should be noted again that the score is calculated based on how travel times to the nearest relevant destinations (for the specific type of service) compared to the average travel time across all locations in the study area. The score is comparative, measuring where accessibility is higher and lower than the mean in the study area, rather than an objective score of the levels of accessibility.

The figures below present the ATOS results for accessibility to schools in Athenry by walking, with analysis, first and then cycling. ATOS maps for access to other services including employment, healthcare and shops is provided in the full Baseline Report included in Appendix B.

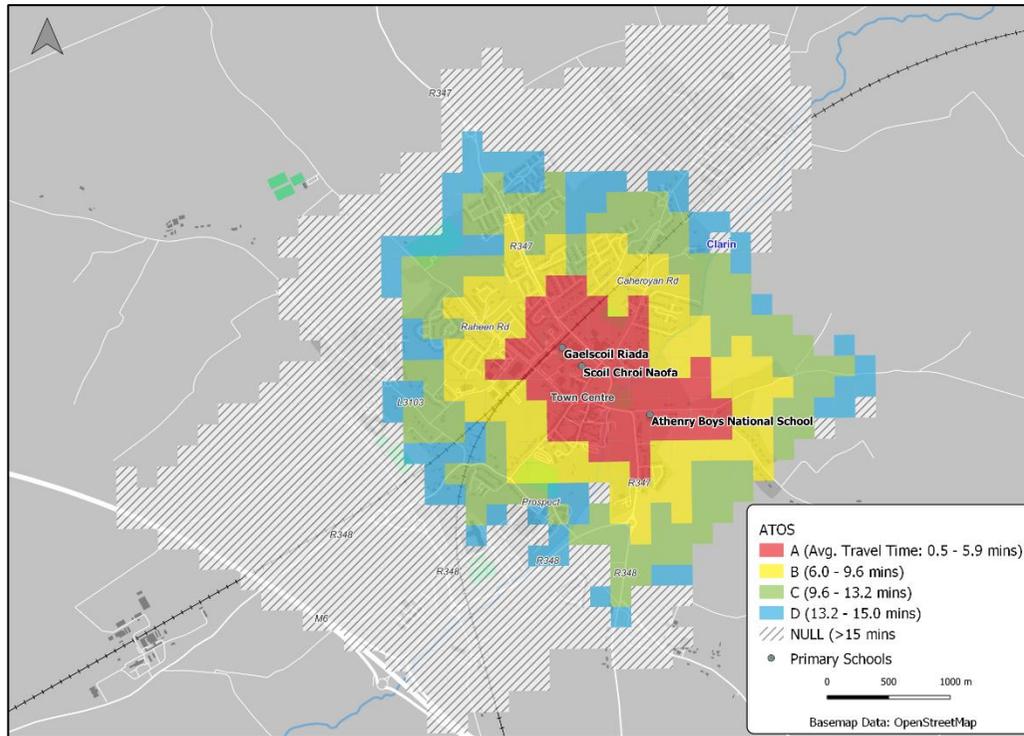


Figure 3-8: Access to Primary Schools (Walk)

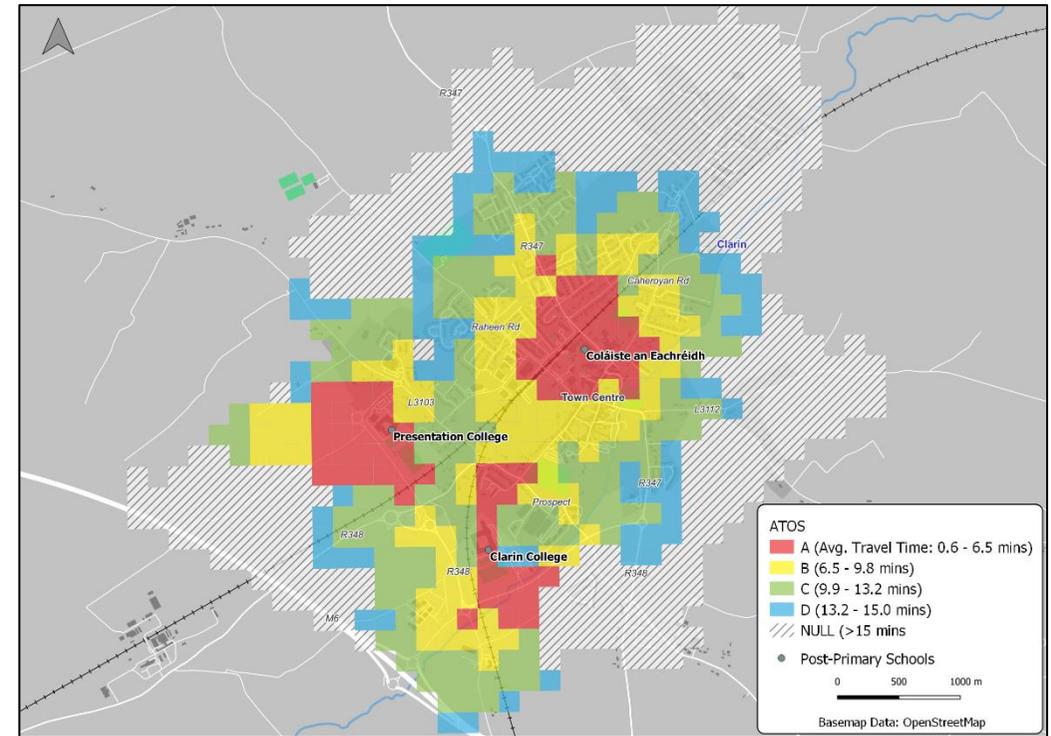


Figure 3-9: Access to Post Primary Schools (Walk)

The ATOS results for walking to schools in Athenry shows very high levels of accessibility in the town centre for both primary and secondary schools. The denser street network around the town centre enables a high level of access to the schools from the centre. The relatively poor level of permeability between housing estates and between the Tuam Road and Raheen Road is evident once again however, with a relatively quick transition from areas with A ratings to areas with C or D ratings moving north and west of the town centre. For primary schools, housing in the south and north-east of the study area are too far from the centrally located primary schools to reach in a 15-minute walk.

For Presentation College and Clarin College located in the west and south of the study area, the lack of a dense street network and development between these sites and the M6 is evident in the relatively small walking catchment of the two schools. Presentation College in particular suffers from poor east-west permeability between housing estates along the Tuam Road and Raheen Road. The lack of connection between Páirc na hAbhainn and the R348 severs this housing area from Clarin College's 15-minute walking catchment.

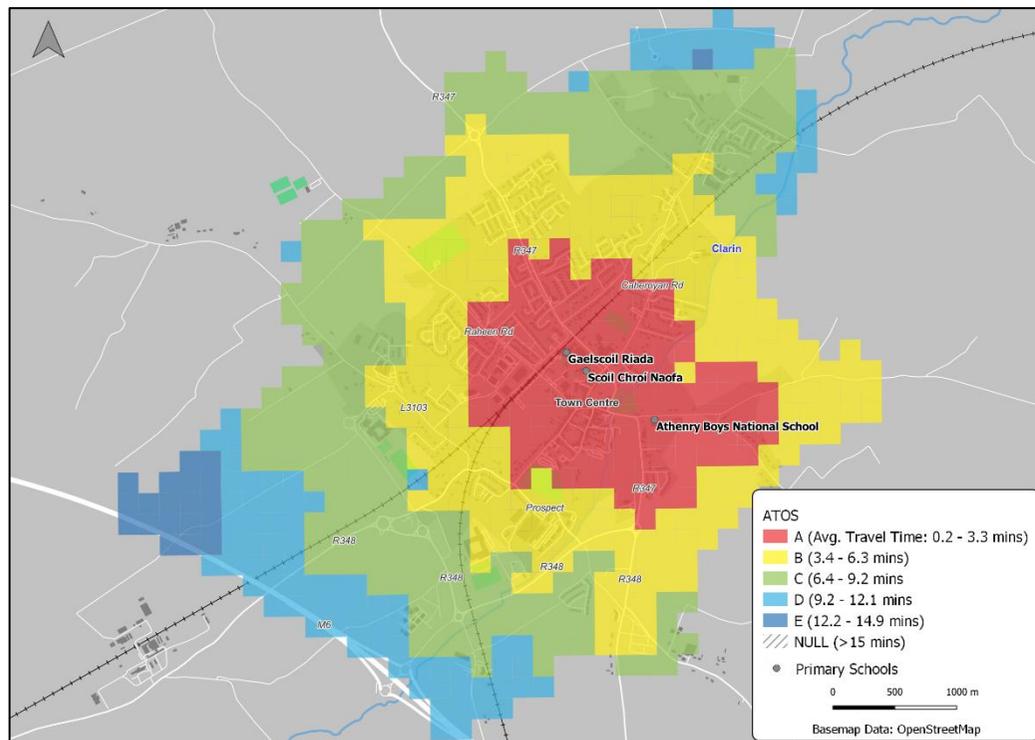


Figure 3-10: Access to Primary Schools (Cycle)

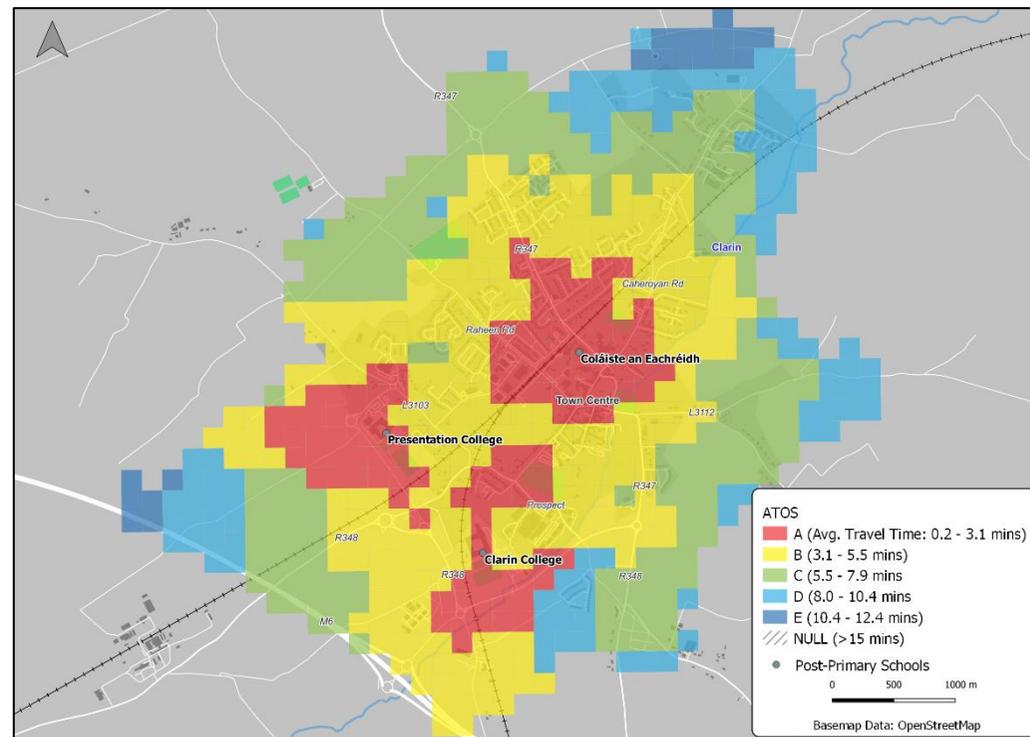


Figure 3-11: Access to Post-Primary Schools (Cycle)

The increased distances that can be covered by cycling are again evident in the much greater area that gets achieves a B or C rating for access to both primary and secondary schools compared to walking. As in access to employment, housing around Ballydavid towards Monivea has relatively poor levels of access to schools by both walking and cycling due to its increased distance from the town centre. The lack of access between Páirc na hAbhainn and the R348 by Clarin College is visible by the estate’s better access to primary school (Athery Boys National School) than Clarin College which it is much closer to as the crow flies.

The much higher levels of access by cycling than walking to schools and employment in the study area shows the potential of cycling in Athery to provide great levels of access without the need to drive.

3.8 Existing Transport Infrastructure and Services

3.8.1 Walking Network

An analysis of the walking network in Athenry has been undertaken involving both a desktop review and site visit. Key areas, including both strengths and weaknesses are highlighted in Figure 3-12 below.



Figure 3-12: Highlighted Sections of Walking Infrastructure in Athenry

The quality of pedestrian infrastructure in Athenry is quite varied. While most of the approach roads to the town centre have footpaths of acceptable width on at least one side of the road, and often both sides such as on Tuam Road in Figure 3-12, footpaths tend to narrow or disappear completely at pinch points in the town centre. As shown in the figure above, pinch points such as on Court Lane and Barrack Street have limited or no pedestrian infrastructure, a pattern that is replicated along most side streets in the town centre.

A notable exception is at the Railway overbridge on the Tuam Road (right), where restrictions are in place for motor traffic in the form of a stop-go shuttle system, and continuous footpaths are maintained at this location close to multiple schools. High quality walking infrastructure is also evident on the eastern end of Cross Street where the public realm and footpath widths have been enhanced.



Outside of main roads and streets, the residential areas north of the railway line in Athenry suffer from poor permeability in places, particularly in an east-west direction – see example in Figure 3-13 below. This can significantly increase walking distances to key services for residents in the town.

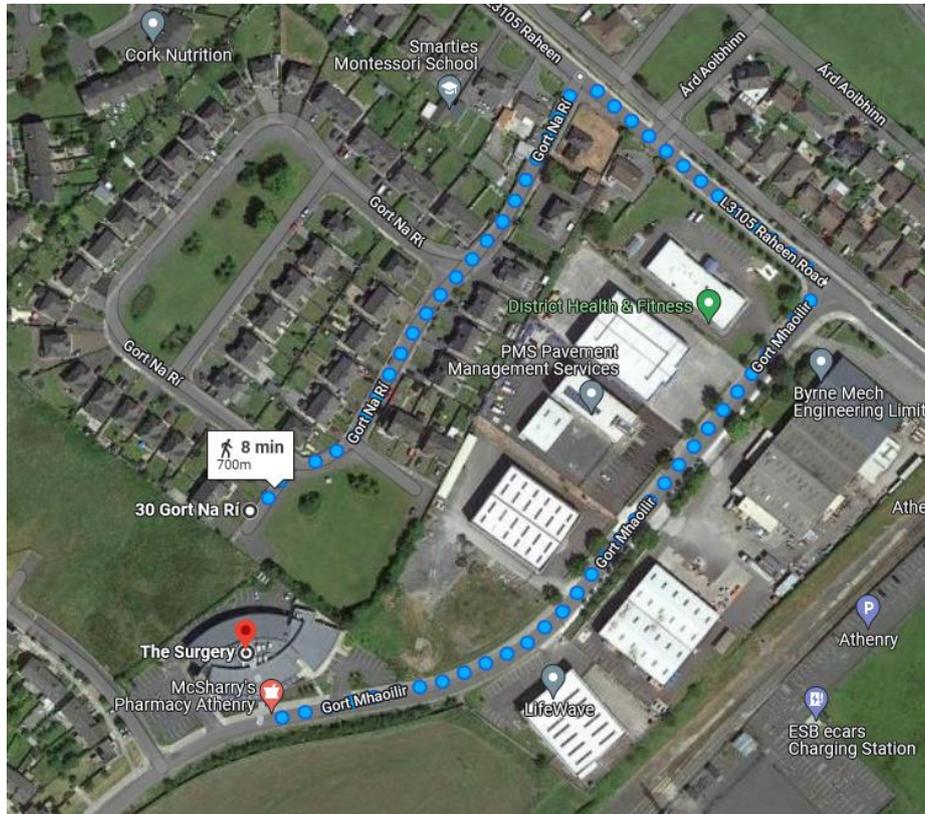


Figure 3-13: Permeability block in Athenry (700m walk for 50m crow fly distance)

A positive piece of walking permeability however is the footpath from Lorro Gate to the new Clarin College site which greatly increases the walking accessibility of the new school site from the town and local residential areas, as well as removing the need for pupils to walk along the busy R348.

Throughout the study area there are limited formal crossing facilities, apart from a small number of zebra crossings at schools in the town centre, leading to a low level of service for pedestrians with mobility or visual impairments.



3.8.2 Cycling Network

Figure 3-14 below illustrates the existing cycling infrastructure in Athenry. There are grade separated cycle tracks on the completed sections of the Athenry Relief Road to the north of the town and along the newly completed section of road at Presentation College, however there are no cycle tracks along the section at the school gate. These cycle tracks have a version of a cycle friendly roundabout at junctions, featuring shared space, but no raised crossings resulting in priority for vehicular traffic and reduced safety for cyclists and pedestrians.

In addition, there is a new section of one-way cycle track along the R348 between Clarin College and the Baunmore Roundabout, stopping short of the roundabout itself.

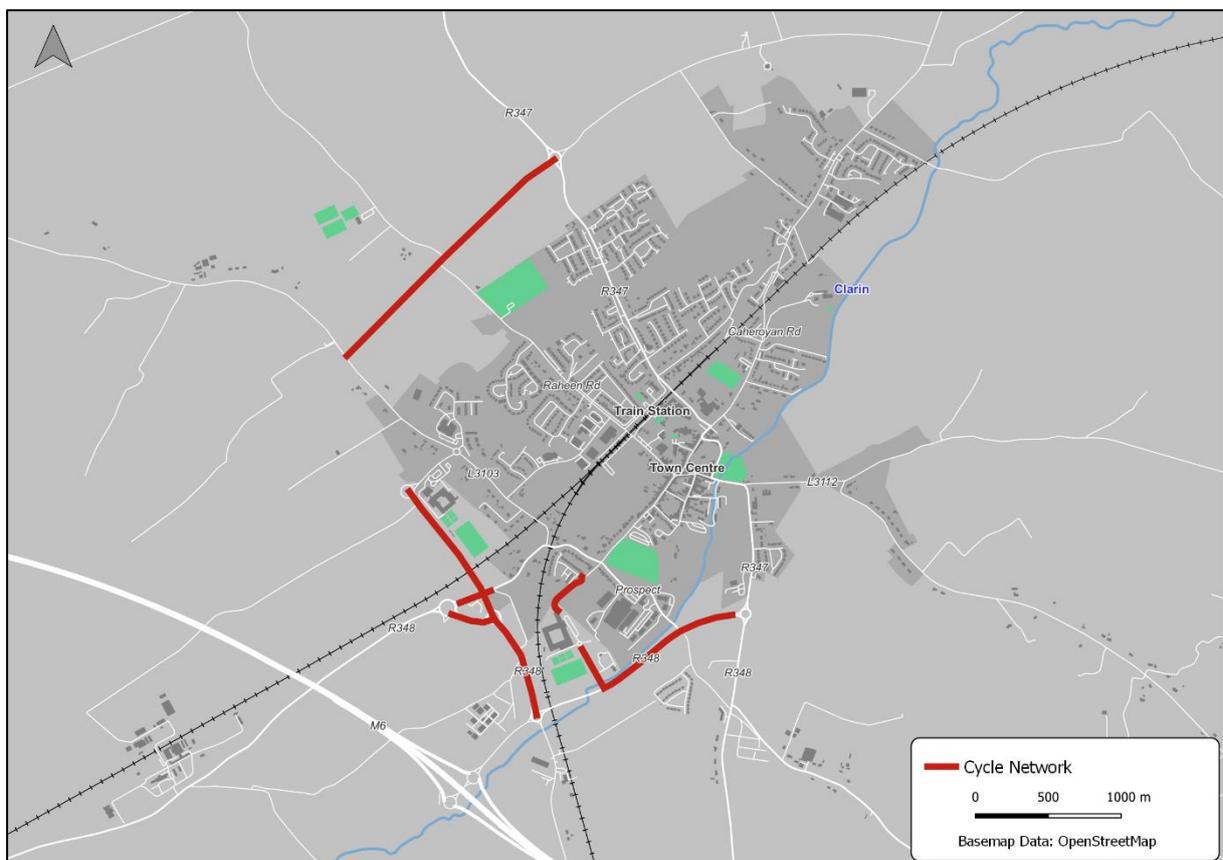


Figure 3-14: Cycle Infrastructure in Athenry

Existing proposals for cycling infrastructure investment in Athenry have been analysed, along with the development of potential new cycling options, during the Options Development and Assessment stages of the LTP.

3.8.3 Public Transport

Rail Network

Athenry rail station is located on the Galway to Dublin rail line and is also the current terminus of the Western Rail Corridor providing connections to Ennis and Limerick. Athenry therefore has direct rail connections to Galway, Limerick and Dublin.

The table below outlines the daily services to/from Athenry:

Table 3-6: Athenry Rail Services

ROUTE	MAX NUMBER OF SERVICES (MONDAY – FRIDAY)	MAX NUMBER OF WEEKEND SERVICES (SATURDAY)
Athenry - Galway	17	15
Galway - Athenry	18	15
Limerick - Athenry	9	9
Athenry - Limerick	8	8
Athenry - Dublin	10	9
Dublin - Athenry	9	8

The station is located in the centre of the town, with access via Station Road and Church Street. Active travel links to the rail station are poor for cycling, with no dedicated cycling infrastructure and front of station treatment aiming to maximise ease of car drop offs and parking.

Bus Network

Figure 3-15 illustrates the bus services currently operating in Athenry. There are no town bus services, with the main service being a commuter route to Galway City operated by commercial operator Farrells focused on the AM and PM peaks. This route is complemented by a once-weekly return service to Loughrea on Thursday operated by Local Link Galway/Bealach na Gallaimhe Teo., leaving at 09:30 and returning at 13:30. This is a door to door, advance booking service and times vary depending on pick-ups. The bus routes and frequencies serving Athenry are presented in the table below:

Table 3-7: Athenry Bus Routes

ROUTE	OPERATOR	MAX NUMBER OF WEEKDAY SERVICES	MAX NUMBER OF WEEKDAY SERVICES
418 (Athenry – Galway)	Philip Farrell	7	7
Athenry – Loughrea (Door to Door Service)	Local Link Galway/Bealach na Gallaimhe Teo.	1	1

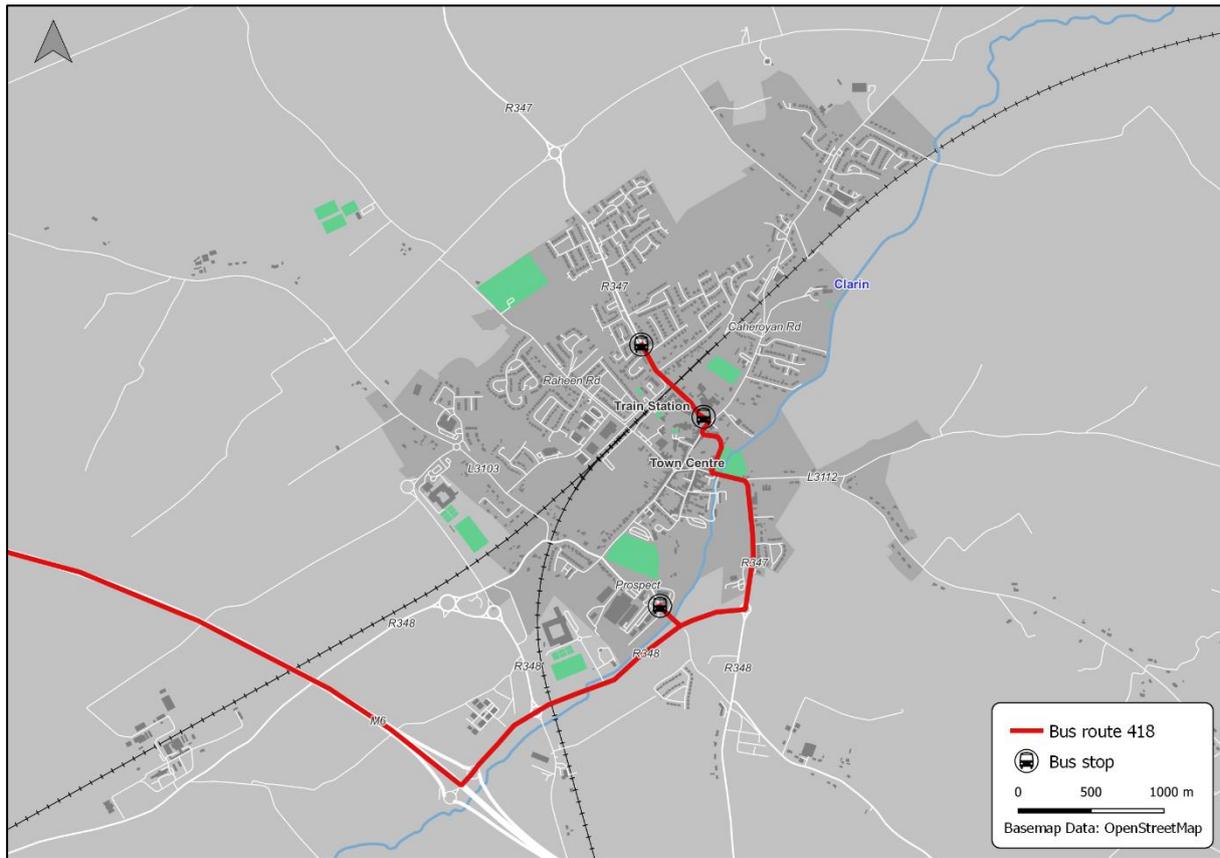


Figure 3-15: Athenry Bus Network

The Farrells bus serves three stops in Athenry – Londis on Tuam Road, the Arch Car Park and Athenry Shopping Centre. There is no formal bus stopping infrastructure at any of these locations. All existing bus stopping locations lack any dedicated facilities such as bus stop poles or shelters, benches, tactile paving, timetable information or real-time information.

The Connecting Ireland Rural Mobility Plan⁵ is a major national public transport initiative developed by the National Transport Authority (NTA), with the aim of increasing connectivity, particularly for people living outside our major cities and towns. Consultation on the proposed network took place during 2022, with the feedback currently being assessed by the NTA. For Athenry, there are no new services proposed, with the existing 418 route retained.

School buses also serve the local educational institutions in Athenry. The School Transport Scheme provides transport to and from school for children who live remote from their nearest school. The scheme is operated by Bus Éireann on behalf of the Department of Education.

⁵ Source: <https://www.nationaltransport.ie/connecting-ireland/proposals/>

3.8.4 Road Network

Strategic Road Network

The primary road serving Athenry is the M6 which bypasses the town and provides links to Galway and Dublin. The M6/M17/M18 junction lies roughly 3km west of Athenry, linking to Ennis/Limerick and Tuam and onwards to Claremorris and Sligo.

Access to the town road network from the M6 is via Junction 17 and the R348.



Figure 3-16: Athenry Strategic Road Network

In addition to this national route, two main regional roads serve the town. The R347 connecting to Tuam and Craughwell and the R348 connecting to Oranmore and Ballinasloe act as main arterial routes towards the town. The L3107 towards Monivea, and the L3112 from the east also act as arterial routes to the town.

Local Road Network

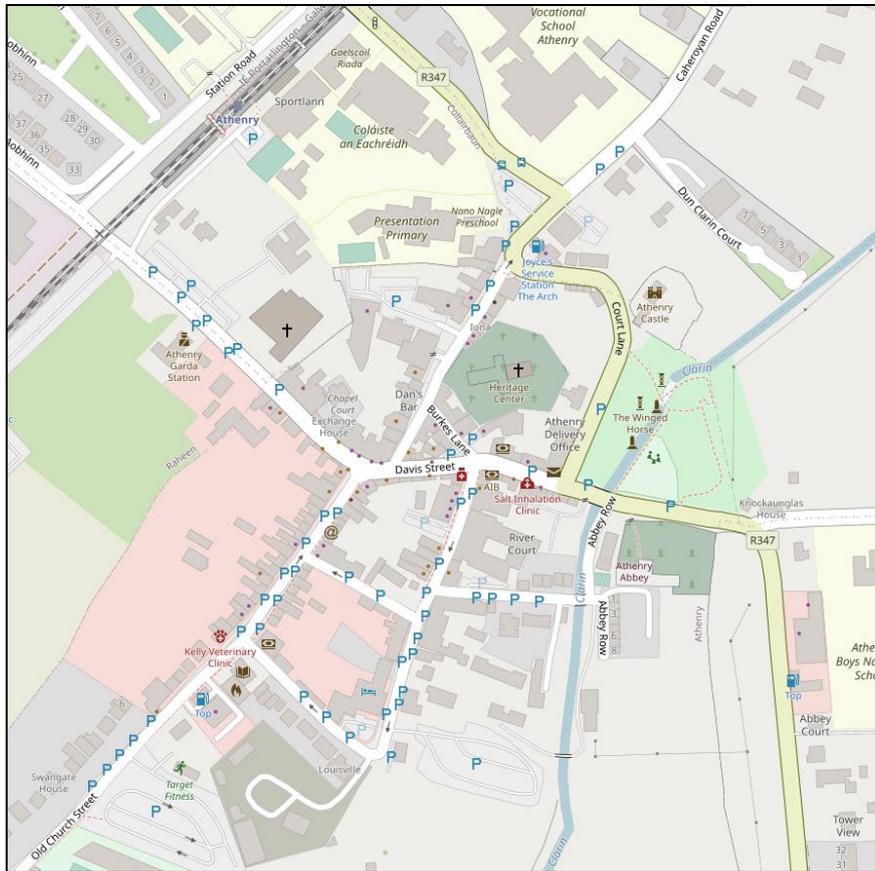


Figure 3-17: Athenry Town Centre Local Road Network

In the town centre, the L3107 connects with the R347 and flows into North Gate Street, meeting with Davis Street towards Cross Street and Old Church Street. The R347 becomes Bridge Street then Court Lane, passing Athenry Castle before crossing over the railway lane and onwards to the Athenry Relief Road.

Outside the school campus on Court Lane, there is an unsignalised junction with Caheroyan Road where north/south traffic meets east/west traffic through the town. There are two raised zebra crossings which provide pedestrian priority and traffic calming, but there is no formal pedestrian crossing on the Caheroyan Road arm and no cycle lanes/tracks.

The Relief Road also connects with the L3103 and L3105 which links residential areas north of the railway line with the town centre on the southern side.



Figure 3-18: Zebra Crossings at Court Lane/Caheroyan Road junction

There is an effective gyratory in place in the town centre, up Old Church Street and down Cross Street via Davis Street and Clarke Street. There is minimal carriageway width along much of this route due to parking on both sides of Old Church Street and Cross Street.



Figure 3-19: Main Railway Line Road Crossings in Athenry, Railway Overbridge (left) and Level Crossing (right)

Given the existing land uses in the town, with residential development concentrated on the northern side of the rail line and the town centre to the south, there is an element of severance with a large amount of traffic to the town centre required to cross the rail line at either the railway overbridge on the Tuam Road or the level crossing on Church Street (see Figure 3-19).



Figure 3-20: Congestion During Pick-Up at Presentation College

Congestion in the town is mostly associated with school traffic, with traffic building up around the new Presentation College site in particular. This is despite many school bus services running. Footpath parking on both sides of the road outside the school exacerbates issues with congestion.

The Raheen Woods Roundabout by Presentation College does not have raised pedestrian crossings despite proximity to the large school, and the footpath can be too narrow to cater for the number of pupils at peak times. There are no cycle lanes/tracks at the roundabout. These congestion issues have been taken into account during the Options Development and Assessment stages of the LTP.

3.9 SWOT Assessment

The findings summarised above from the Baseline Assessment have been used to inform a Strengths, Weaknesses, Opportunities and Threats (SWOT) analysis for the study area. The results are outlined in Table 3-8 below. This has been used to inform subsequent stages of the LTP, in particular the objectives setting and options development.

Table 3-8: SWOT Assessment of Athenry

Strengths	Weaknesses
<p>Key Points:</p> <ul style="list-style-type: none"> ○ Athenry is classified a town with strategic potential in the GCDP 2022-2028. ○ Strategic traffic to Galway, Dublin and Limerick is well served by the nearby M6 and onward connection to the M18. ○ There are public transport services provided to Galway City by bus and train. ○ Athenry town centre is the largest attractor of employment trips (1,428 attractions) within the study area. Other key employment areas include the train station environs and Raheen Industrial Estate. ○ The town is generally quite flat, although it rises towards the relief road, while the surrounding greenfield land within the study area is generally hillier, rising again towards Monivea and Attymon. The flat nature of the town core is beneficial for active travel. 	<p>Key Points:</p> <ul style="list-style-type: none"> ○ Very limited public transport connections to surrounding towns. ○ There is severance caused by the rail line, limiting access from northern residential areas to southern destinations. ○ There is an absence of cycle infrastructure in the town, bar some disconnected links on the town edge, although cycle parking is present in a few locations. ○ Pedestrian facilities (pavement widths and pedestrian crossings) are poor or lacking at a number of links and key junctions within the town centre. ○ Car remains the dominant mode of transport, even for shorter distance commute trips. ○ A number of key junctions are unattractive to pedestrians and cyclists due to design prioritising motor vehicles. ○ Public transport represents just 5.5% of commute trips and active travel just 9.5%.

Opportunities

Key Points:

- Most of the study area is accessible within a 15-minute cycle. The provision of safe and attractive active travel links provides a potential opportunity for modal shift from car.
- Footpaths and crossing points for pedestrians in the town centre could be greatly improved within existing street widths, improving the attractiveness of the town.
- The large number of school places within the study area compared to the study area population shows the large catchment of the town that could potentially be better attracted to shop and spend time in the town through improvements to the urban realm.
- Approximately one-third of work and education combined trips from Athenry remain within the study area, and due to the local nature of these trips, there may be an opportunity to support this demand via active travel.
- The relatively flat topography of the study area would be beneficial for potential trips shifted to active travel.
- Significant improvements to public transport between Athenry and Galway City will be enabled by the passing loop to be installed at Oranmore station, and further improvements could be made possible via double tracking between Galway and Athenry as proposed in regional and local policy.
- The very low cycling mode share for education trips, despite high levels of cycling accessibility to schools from the study area in the ATOS assessment and large number of shorter trips, provides an opportunity to see large growth in numbers cycling to school through active travel measures

Threats / Constraints

Key Points:

- School traffic is the major cause of congestion in the town, exacerbated by footpath parking on key links.
- There are a very large number of school trips destined for the study area originating within the surrounding rural hinterland. It will be difficult for these trips to be served by active travel.
- The LTP study area is constrained by the physical barrier of the rail line which causes severance.
- Car ownership is quite high within the study area with 90% of households owning at least one car, and 42% owning 2 or more. If this pattern continues for new developments, it will likely lead to additional vehicular traffic on the road network.

4. LTP OBJECTIVES & FUTURE DEMAND FOR TRAVEL

4.1 Overview

Part 2 of the ABTA process focuses on applying the information gathered from the baseline assessment (including the SWOT analysis) to determine the principles and objectives that guide the development of the Local Transport Plan (LTP). The following sections provide an overview of the methodology used to derive the objectives for the Athenry, along with the Key Performance Indicators (KPIs) used to assess the performance of the strategy options in meeting the study objectives.

4.2 Developing the Objectives and KPIs

The development of the principles and objectives for the Athenry LTP were informed by:

- The opportunities and constraints identified in the Part 1 Baseline Assessment SWOT Analysis;
- Existing local policies and objectives; and
- National level policy guiding the delivery of sustainable development.

In order to ensure a robust assessment of transport options, the objectives were broadly aligned with the key categories outlined in the Department of Transport’s Common Appraisal Framework (CAF) with common themes identified:

- Accessibility & Social Inclusion: supporting local accessibility by walking and cycling within Athenry for all users;
- Environmental: supporting climate change initiatives and a general switch to more sustainable modes of travel;
- Economic: supporting the vibrancy and connectivity to Athenry Town Centre enhancing its economic competitiveness;
- Integration: supporting the integration of land use and transport planning in a manner that can affect significant modal shift to walking, cycling, and public transport; and
- Safety & Physical Activity: promote walking and cycling, and provide a safe environment for vulnerable users.



A detailed review was then undertaken of Local and National Policy to identify existing objectives under each of the CAF headings and themes outlined above. In particular, strategic outcomes and policies from the GCDP 2022-2028 were identified which could inform the principles and objectives for the Athenry LTP. The SWOT analysis from the Baseline Assessment was also reviewed to identify specific constraints and issues currently within the study area which should be addressed by the Athenry LTP objectives. **Whilst the objectives developed for the LTP focus on the need to improve travel by sustainable modes in Athenry, in accordance with DoECLG Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’, an overarching aim in the development of all LTP transport measures is the need to safeguard the strategic function, capacity and safety of the existing national road network in the Plan area.**

Performance measurement is used to determine if the full set of recommendations proposed under the Athenry LTP achieve the desired outcomes. Key Performance Indicators (KPI's) have been identified and were used to measure the performance of the LTP strategies under the various objectives. Table 4-1 below outlines the objectives and associated KPIs developed for the Athenry LTP.

Table 4-1: Athenry LTP Objectives and KPIs

HEADING	OBJECTIVE	KPI
Accessibility & Social Inclusion	Support and implement transport measures which reduce car dependency and improve access to local services by sustainable modes	Access to key services (ATOS Analysis)
		Qualitative (Rating scale) access to PT opportunities
Integration	To align and integrate with existing and emerging national, regional, and local planning policy	Compatibility of transport measures with local, regional and national policy - Rating Scale
Safety & Physical Activity	Provide safe access to schools for vulnerable road users and ensure a safe front of school environment	Qualitative assessment of walking and cycling infrastructure to schools - Rating Scale
		Reduction in walking/cycling distances to school sites (GIS/ATOS assessment)
Environment	Contribute to achieving Climate Action Plan targets through the creation of an environment which encourages a modal shift from the private car to more sustainable modes	Anticipated change on sustainable mode shares - rating scale
		Length of additional / improved walk and cycle infrastructure
Economy	Contribute to Athenry's economic vitality through improved connectivity and enhanced public realm	Access to Town Centre for each mode - Comparison of change in journey length (can be measured back to Do Min) and quality of route to town centre by mode
		Quality of Town centre streetscape /public realm – Rating Scale
		Deliverability Rating Scale- (With consideration to cost, engineering constraints e.g. topography / flooding constraints, third party support/acceptability e.g. does the measures require land acquisition from a single or multiple bodies)

4.3 Future Demand for Travel

In addition to the review of present-day conditions in Athenry, the project team examined the Draft Athenry Land Use Zoning Map. In collaboration with Galway County Council, an assessment of appropriate lands for future potential development was completed. The existing development patterns in Athenry were taken into account during this process. Access to existing, and planned, development sites was taken into consideration when determining the transport options for the LTP.

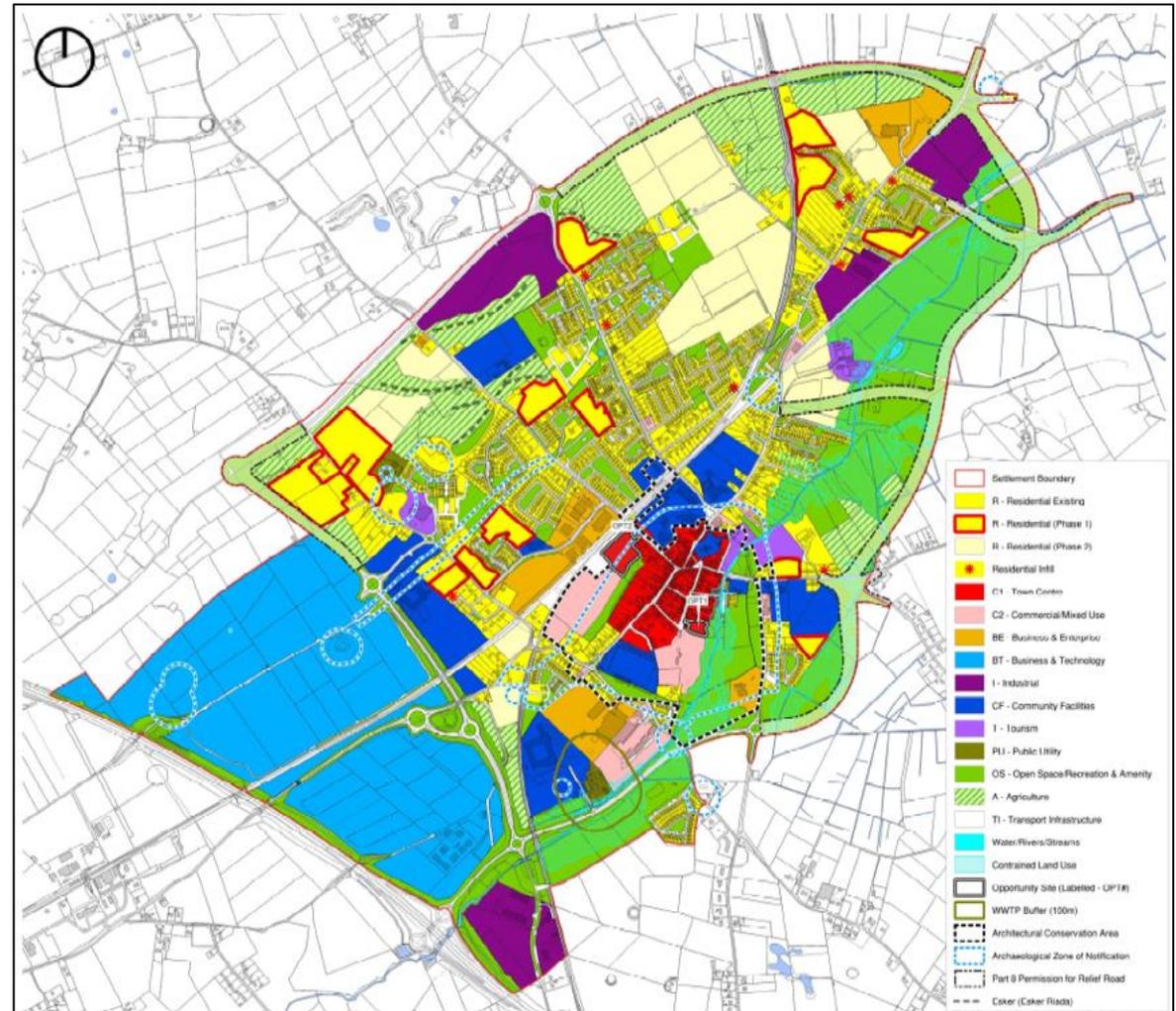


Figure 4-1 Draft Athenry Land Use Zoning Map

5. OPTIONS DEVELOPMENT & ASSESSMENT PROCESS

5.1 Options Development

An initial long-list of transport options were developed to address some of the weaknesses and constraints identified in the baseline assessment, and achieve the defined objectives for the LTP. The options list was developed in collaboration with the wider project working group including members from GCC and the NTA, through the following:

- **Data review** to identify proposals from wider policy/strategies for the study area;
- **Site visits** to review issues identified in the baseline assessment and opportunities for improvement; and
- **Workshops** between the project working group to discuss and agree potential options.

The options development process followed the Department of Transport’s National Investment Framework for Transport in Ireland (NIFTI) modal and intervention hierarchies (Figure 5-1). As such, options for applicable measures were first considered in relation to active modes (walking and cycling), followed by public transport and finally vehicular traffic. Options were also initially focused on maintaining, optimising and improving existing facilities before considering the construction of new infrastructure.



Figure 5-1: NIFTI Modal and Intervention Hierarchy

The following sections provide a brief overview of the options considered across active modes, public transport, vehicular traffic and supporting measures identified to assist in achieving the overarching Athenry LTP objectives. Full details on the long list of options, including maps and descriptions can be found in Appendix C.

5.1.1 Active Travel – Walking and Cycling

The development of the walking and cycling options built on the existing proposals of the NTA’s Cycle Connects inter-urban network and planned network improvements identified by Galway County Council.

The key aim in developing Active Travel Options is to provide Athenry with a safe, comfortable and integrated walking and cycling network enabling trips to school, work, shopping and all other purposes to be made using active travel. Options focused on improving connectivity and permeability from residential areas to main trip attractors, including the town centre, key employment and education

sites and leisure opportunities. Of particular focus was connecting residential areas north of the rail line with schools south of the rail line, building on the work underway with An Taisce’s Safe Routes to School programme.

Where feasible, fully segregated cycle facilities are proposed to improve safety for cyclists. Where segregation was not possible given space constraints, particularly within the town centre, measures have been proposed to provide a safe, low speed, traffic calmed environment for sections of cycle trips which must be made on-road.



Figure 5-2: Example of a Segregated Cycle Track

The town centre’s medieval streets are often very narrow, creating difficulties for the provision of segregated cycle infrastructure. Footpath widths are generally below minimum standards with a lack of formal road crossings creating an unattractive environment for pedestrians and cyclists. Given these spatial constraints and existing conditions, improving pedestrian safety and comfort was the priority in central areas. In addition, a number of contra-flow cycle tracks are proposed to increase cycling safety and permeability on the town centre’s one-way streets.

A number of leisure and amenity routes have also been proposed. This includes the proposed town wall walk and a pedestrian/cycle route along the Clarinbridge River connecting Clarin College to the town centre.

5.1.2 Public Transport Options

While active travel investment focuses on encouraging people to switch from car to cycling or walking for short distance journeys, public transport has the potential to encourage mode shift from car journeys for medium and longer distance trips.

The development of public transport options has incorporated insight from the Baseline Assessment and engagement with the NTA, with the aim of encouraging increase in use. As such, the options within the LTP seek to:

- Enhance accessibility for active modes from residential areas to bus stops and the rail station;
- Improve facilities at public transport nodes, through the provision of sheltered waiting areas, cycle parking, passenger information etc; and
- Work alongside the NTA to deliver enhanced bus and rail services to villages and towns in the wider region.

5.1.3 Road & Traffic Management Options

Options for the Road Network strategy were identified in order to improve safety for all road users. The priority in the development of the road network options (as per NIFTI) is to maintain, renew, manage and operate the existing road infrastructure in a more efficient manner, and any new road schemes must demonstrate that public transport, traffic management or demand management measures can’t effectively address the problem prompting the road proposal or are not applicable/appropriate.

Therefore, road options that would unduly induce car trips that could otherwise be made by active travel would not be appropriate. However, road options that facilitate the reallocation of road space in the town centre by enabling traffic to bypass the town centre streets are more in line with the LTP objectives and current national policy.

Given these considerations, the main road options are associated with the Athenry Relief Road as defined in the LAP, and included as a Policy Objective in the GCDP 2022-2028. The sections yet to be completed of this scheme have been separated out for assessment. No further new road infrastructure options are proposed as part of the long list.

In addition to options concerning upgraded and new road infrastructure, a number of traffic management options were developed in combination with associated Walking & Cycling proposals. These traffic management options are mainly located in the town centre where streets are narrow and active travel facilities are presently poor. These options and their associated Walking & Cycling measures aim to improve the public realm in key areas and provide a safer environment within the town.

5.1.4 Supporting Measures

In line with the Five Cities Demand Management Study Avoid-Shift-Reduce-Manage Transport Demand Management (TDM) Toolkit to reduce carbon, improve air quality and the urban environment, and manage congestion, a range of TDM Measures have been identified to support the switch to sustainable modes across the Study Area.

In line with Safe Routes to School measures proposed by An Taisce in Athenry, a number of potential Park & Stride⁶ sites have been identified which would reduce congestion at school gates. Schools in Ireland which have implemented park and stride have found that children are more alert in the morning, having had some fresh air and exercise⁷.

Supporting measures include those to promote Active Travel, Public Transport and School Travel. A number of behavioural change measures are identified, including the role that Mobility Management can play in both avoiding the need to travel and supporting a switch from car travel to sustainable modes on a site by site basis.

⁶ The concept of 'Park & Stride' means parking the car a short distance from your destination and making the last leg of the journey on foot. This can have health benefits in terms of promoting physical exercise, whilst also removing traffic from heavily congested areas e.g. outside school gates.

⁷ Fingal School Streets: Pilot Review 1 <https://www.fingal.ie/sites/default/files/2020-03/20200302-300548-school-streets-pilot-review-1-issue-1.pdf>

5.2 Options Assessment Methodology

Having developed a long list of options, an assessment process was undertaken to determine which of these options are to be included in the Emerging Preferred Strategy for the Athenry LTP. The long list of options were passed through a four-stage assessment process as outlined in Figure 5-3, including:

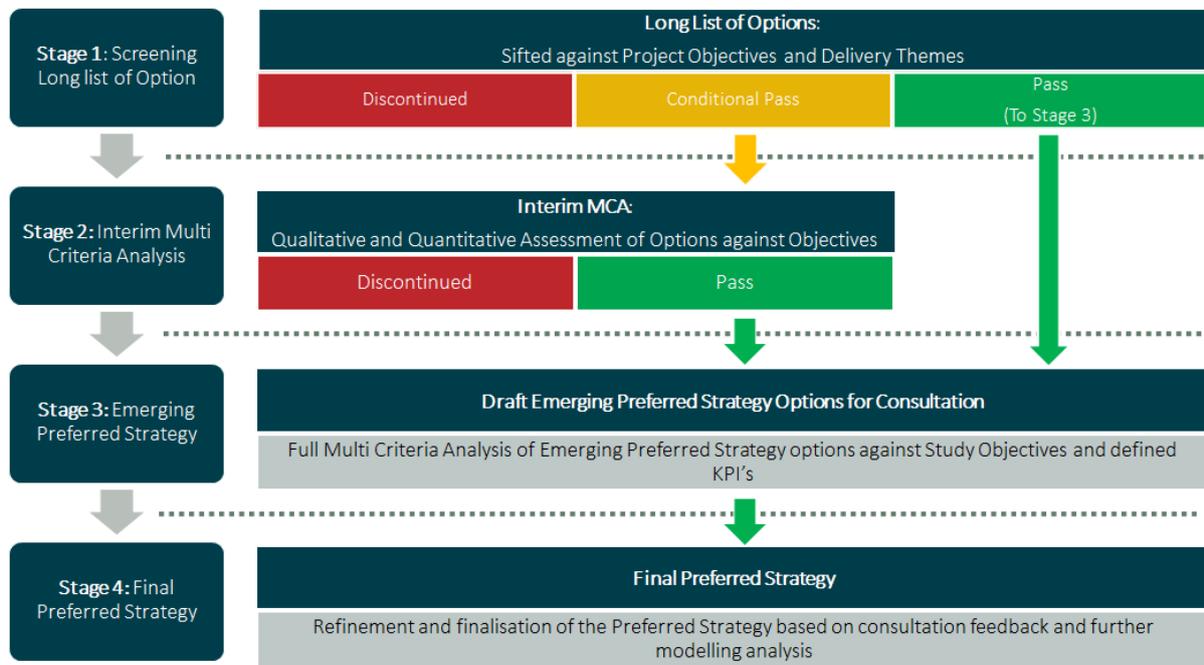


Figure 5-3: Options Assessment Methodology

- **Stage 1 Options Screening:** The long-list of options were screened against the overall project objectives and core delivery themes to identify which ones should be discontinued, which could pass directly to the final strategy, and which required further assessment;
- **Stage 2 Interim Multi-Criteria Analysis (MCA):** Options requiring further analysis were passed through a MCA with qualitative indicators used to score each option against the study objectives;
- **Stage 3 Draft Emerging Preferred Strategy Options for Consultation:** Options passing Stage 1 and Stage 2 form the initial draft Emerging Preferred Strategy for the LTP.
- **Stage 4 Final Preferred Strategy (Post LAP Consultation):** Feedback from the project steering group and public consultation as part of the Athenry LAP process, will be used to refine the preferred strategy for the LTP.

The following sections provide a more detailed description of Stages 1 and 2 outlined above, full details of the process along with the assessment results for the long-list of options are available in Appendix C.

5.2.1 Stage 1: Options Screening

Stage 1 of the Options Assessment examined each of the long list of measures against the LTP objectives. The options were also assessed against the following core delivery themes:

- Engineering feasibility;
- Acceptability;
- Funding potential; and
- Value for money

Based on this initial screening, options were classed as follows:

- **Discontinued:** the option did not align with the LTP objectives and therefore is not included in the Emerging Preferred Strategy;
- **Pass:** the option satisfied the project objectives and the core delivery themes, and no alternative proposals were identified in the options development process. These options passed directly into the Emerging Preferred Strategy without the need for an interim assessment.
- **Conditional Pass:** the option aligned with the LTP objectives, however, either didn't fully meet all of the core delivery themes or had a number of alternative proposals identified. In these instances, the options were assessed in further detail as part of the interim MCA described in Section 5.2.2.

5.2.2 Stage 2: Interim MCA

The Interim MCA stage was used to evaluate alternatives based on their performance in achieving the overarching study objectives outlined in Table 4-1. This assessment was predominantly qualitative in nature. A five-point scoring system, outlined in Table 5-1, was used to assess the options across the various objectives. This produced a performance matrix which was reviewed to rank the scenarios and identify which ones performed best in terms of achieving the defined objectives of the study, and therefore, passed into the Emerging Preferred Strategy.

To ensure that the options that had advanced to the interim MCA stage were assessed holistically, and that mutually exclusive options were assessed at the same time, where possible/reasonable options were packaged together for the MCA process. Detailed work was undertaken to balance the positive and negative outcomes of each option to assess whether it would be included in the Emerging Preferred Strategy.

Table 5-1: Interim MCA Scoring System

Scoring	
Major Benefit: The proposal is expected to have a clear and considerable benefit or positive impact when compared to existing conditions.	
Minor Benefit: The proposal is expected to have a minor benefit or positive impact when compared to existing conditions.	
Neutral: Overall, the proposal is expected to have neither a positive nor negative impact when compared to existing conditions.	
Minor Disbenefit: The proposal is only expected to result in a minor negative impact when compared to existing conditions.	
Major Disbenefit: The proposal is expected to have a clear and considerable negative impact when compared to existing conditions.	

5.3 Summary

This section has outlined the process followed in developing a longlist of options for active travel, public transport, road & traffic management and supporting measures for Athenry as well as the assessment process followed to determine which options would be included in the LTP's Emerging Preferred Strategy. The full details and results of this process are available to view in Appendix C.

The following chapter outlines the Emerging Preferred Strategy arising from this Options Development and Assessment process.

6. EMERGING PREFERRED STRATEGY

6.1 Overview

The previous chapters in this report have detailed the process followed in identifying the Emerging Preferred Strategy for the Athenry LTP. The following sections provide a summary of the proposed measures which have passed through the assessment process and now form part of the Draft Local Transport Plan for Public Consultation.

6.2 Walking & Cycling

The overall proposed walking and cycling measures in the Emerging Preferred Strategy for Athenry are illustrated in Figure 6-1 and Figure 6-2. These measures will deliver radically improved connectivity and permeability from residential areas to main trip attractors including the town centre, key employment and education sites and leisure opportunities.

Where feasible, segregated cycle infrastructure has been proposed to improve safety and comfort for cyclists across the network. In addition to these significant measures, a number of permeability links are proposed which will increase the walking catchment of schools and the town centre. Also included are new and improved footpaths and traffic calming on roads and streets with insufficient width for segregated cycle infrastructure. A full description of the proposed measures included in the Emerging Preferred Strategy are provided in Appendix C. The key elements of the active travel strategy are summarised in the remainder of this section with the following terminology used to describe proposed interventions:

- **Cycle Tracks** = cycle lanes separated from vehicular traffic with a physical barrier.
- **Contra-Flow** = segregated cycle tracks running in the opposite direction to traffic on a 1-way road. This facilitates safe 2-way cycling on 1-way streets.
- **Traffic Calming** = measures to reduce vehicle speeds and create a safer environment for pedestrians and cyclists. Typical measures include:
 - Narrowing of the traffic lanes to minimum recommended widths;
 - Raised pedestrian crossings to provide priority for pedestrians;
 - Tightening of corner radii at residential estates to reduce crossing distances and improve safety;
 - Reduced speed limits; and
 - surface treatments, streetscape and landscaping enhancements.
- **Quietway** = low-trafficked street (typically <2,000 Annual Average Daily Traffic (AADT)) and low-speeds meaning cyclists can safely share the carriageway. Typical measures include:
 - Traffic calming to enforce low-speeds;
 - Improved public realm to encourage active travel;
 - Improved signage and way-finding to encourage use; and
 - surface treatments and landscaping.
- **Permeability links** = walking and cycling links connecting neighbourhoods and providing greater accessibility along desire lines.
- **Traffic Filter** = interventions that allow through access for pedestrians and cyclists but local access only for vehicles.
- **School Zone** = front of school works to prioritise safe pedestrian and cycle access to the school, improving school visibility through signposting & placemaking, reducing vehicle congestion & preventing illegal parking in the area.

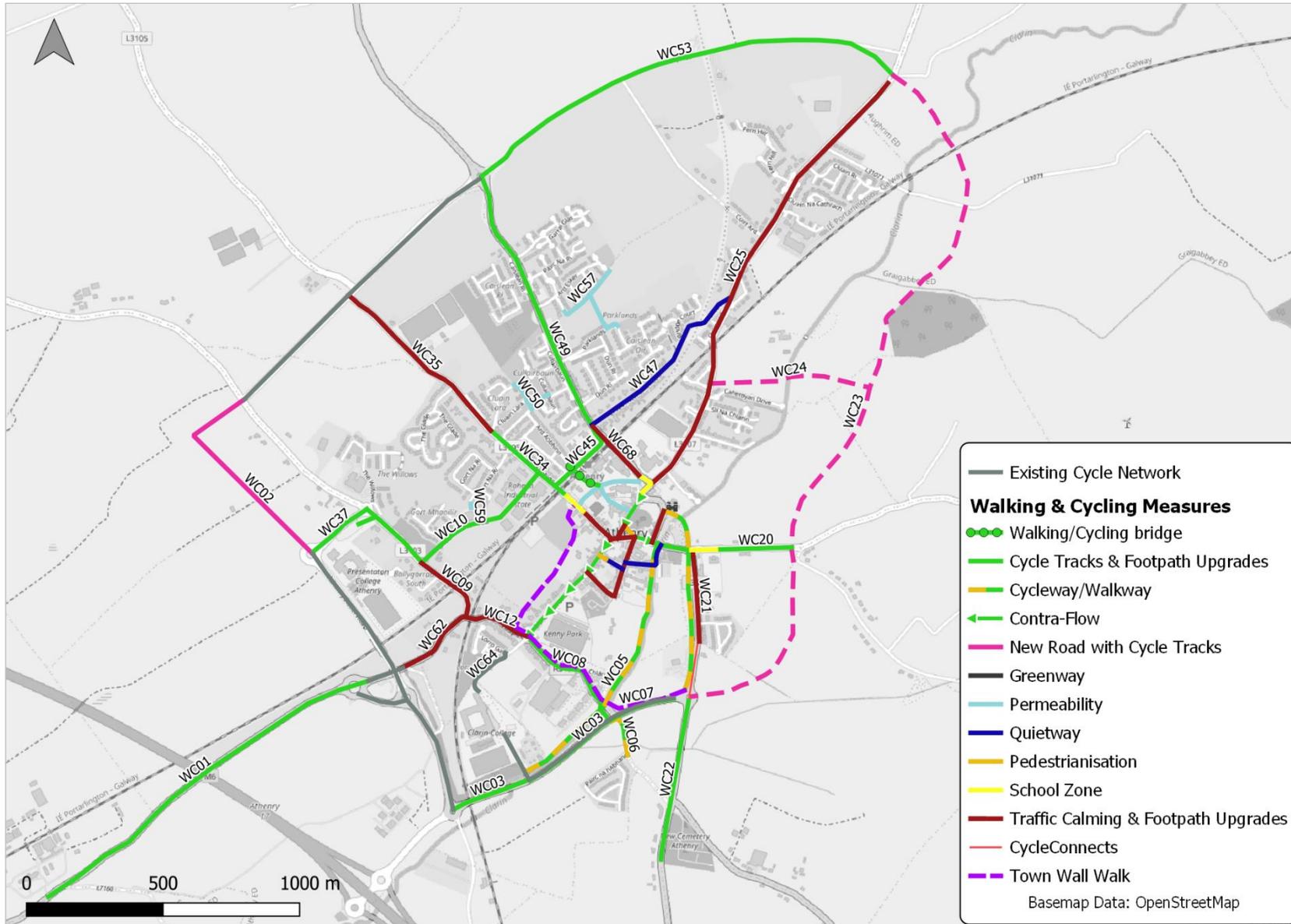


Figure 6-1: Emerging Preferred Strategy Walking & Cycling Measures

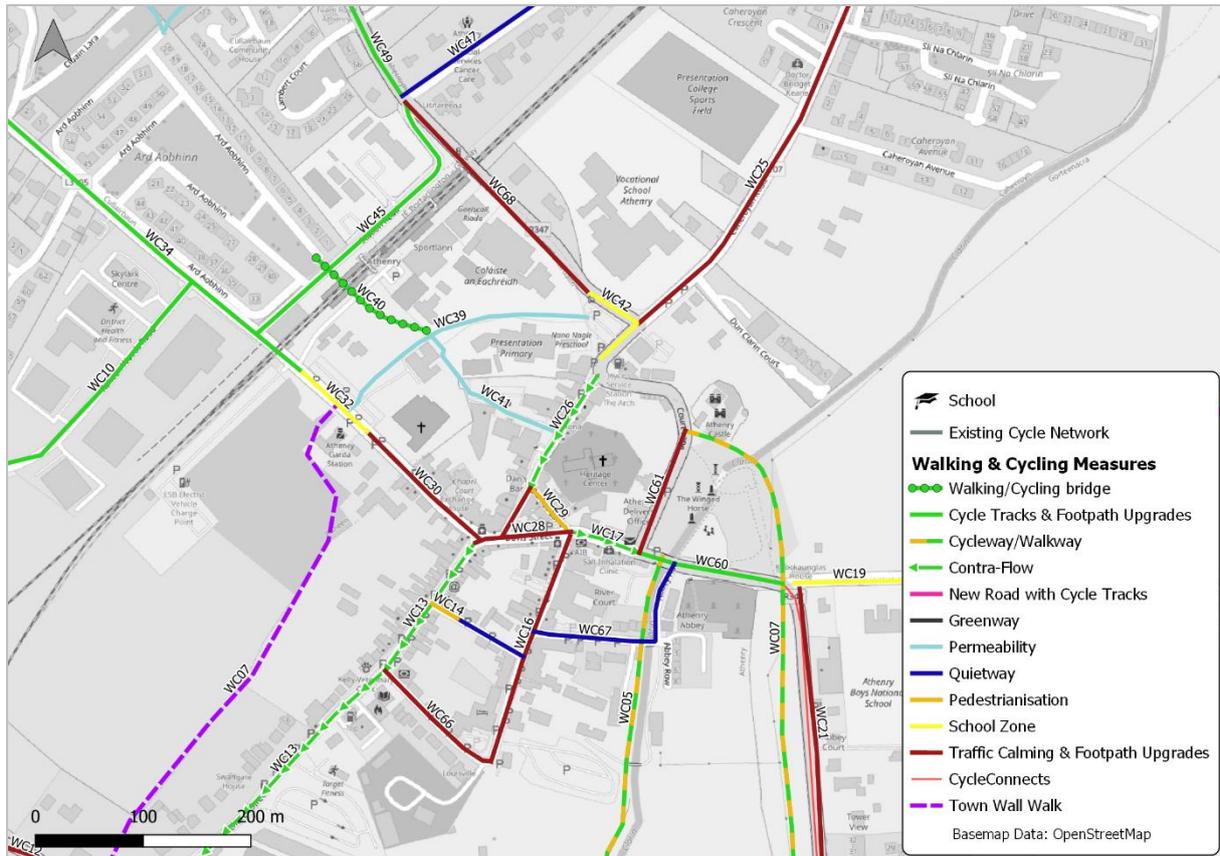


Figure 6-2: Emerging Preferred Strategy Walking & Cycling Measures (Town Centre)

6.2.1 Railway Crossings

The Baseline Assessment for Athenry highlighted the severance caused by the rail line with a significant population living to the north of the railway and a number of key destinations to the south including the town centre and schools. The majority of education trips in the town are under 2km, however travel by car makes up the largest share of journeys. The provision of safe routes to school will help achieve a shift to sustainable modes thereby contributing towards achieving climate action plan targets and helping to create an enhanced quality of life for the town's residents.

The current railway crossing points in the town centre are quite constrained with a level crossing along the L3105 and a narrow bridge on the R347. There is a strong desire line between the residential areas and the schools and town centre, and connecting these via safe and attractive pedestrian and cycle facilities is key to encouraging sustainable travel within Athenry.

A detailed optioneering process was undertaken (see Appendix C) to determine the optimal package of measures for supporting active travel across the rail line. In summary, the following is proposed as part of the Athenry LTP:

Upgrade of the existing level crossing on the L3105 Church Street

This short term solution includes widening of the rail crossing to enable separate, segregated entry points for pedestrians and cyclists away from vehicular traffic. This connection is important as it provides a link into the train station as well as the school zone proposed as part of the Scoil Croí Naofa Safe Routes to School delivery plan.

Construction of a new active travel bridge

This longer term proposal includes the delivery of a new active travel bridge (indicative alignment illustrated in Figure 6-3) providing a safe, segregated walking and cycling connection over the rail line. This combined with permeability links through the Church lands could provide an attractive route for pedestrians and cyclists to the school campus and town centre via North Gate Street. Completely segregated from traffic traversing the town, the route would encourage substantially greater levels of walking and cycling to the town centre and surrounding schools. The delivery of this connection would help alleviate current severance issues due to the rail line and provide significantly improved accessibility for local residents via safe walking and cycling infrastructure.

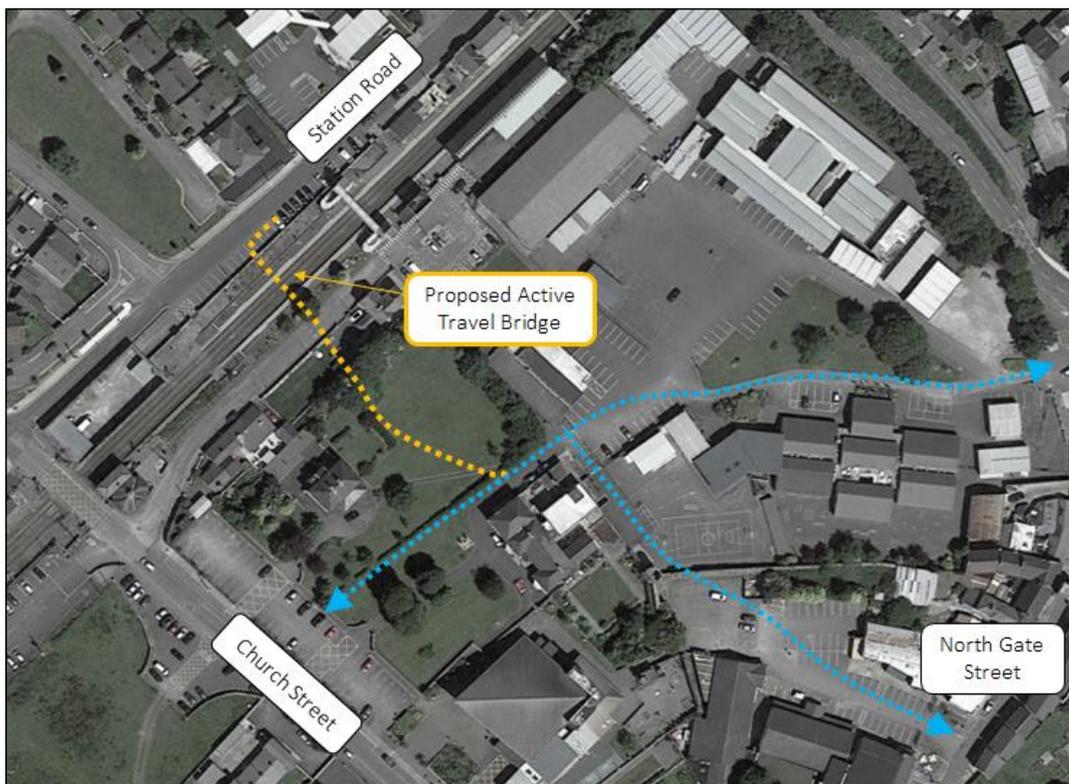


Figure 6-3: Proposed New Active Travel Bridge

However, it is acknowledged that the construction of a new bridge would be a longer-term measure given the cost of delivery and land-ownership. In the short/medium-term, it is proposed to upgrade footpaths along the R347 providing a strong pedestrian link to the schools south of the rail line. Traffic calming measures will be proposed to reduce vehicle speeds and increase safety along this route.

An alternative safe route for cyclists will be provided as part of the wider Emerging Preferred Strategy of measures with segregated cycle infrastructure along Station Road and connecting to the Safe Routes to School scheme on Church Street. Station Road is a critical link in the wider Athenry network, and the upgrade of pedestrian and cyclist facilities along this route will:

- Facilitate safe access by walking and cycling to Athenry Train Station from residential areas along the R347 and L3105 encouraging **interchange-bike/rail integration** and sustainable travel;
- Provide a connection for large residential areas to the school campus south of the rail line and the town centre – linking to the bridge crossing option described previously and proposed upgrades to the existing level crossing;

- Connect with cycle infrastructure proposed on Raheen Woods Road and the L3103 providing a safe pedestrian and cycle route to Presentation College. This should help encourage active travel for local school trips.

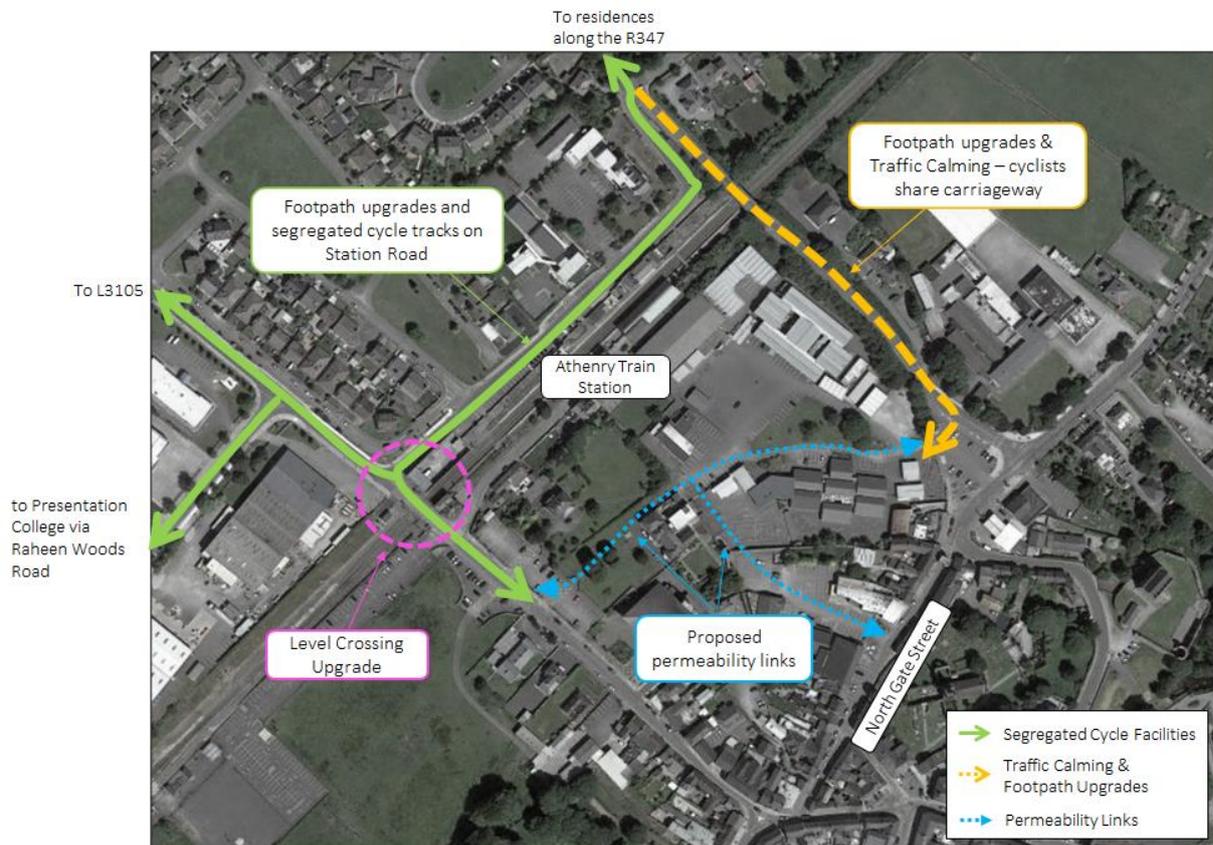


Figure 6-4: Short/Medium Term Active Travel Connections Across the Rail Line – Athenry Town Centre

6.2.2 Town Centre Improvements

Athenry is a historic town which is characterised by meandering and irregular width streets within its centre. The constrained widths result in narrow footpaths at a number of key locations which severely impedes safe access for pedestrians, particularly those with mobility impairments. This, combined with a general lack of formalised pedestrian crossing points, create an unwelcoming environment for visitors arriving on foot or by bike.

In order to improve the attractiveness of the town centre environment, and alleviate safety concerns, a series of traffic management and active travel measures have been proposed as illustrated in Figure 6-5. The goal of the town centre measures is to create a more pleasant environment for people to spend time in Athenry, adding to footfall and supporting the economic growth of the town.

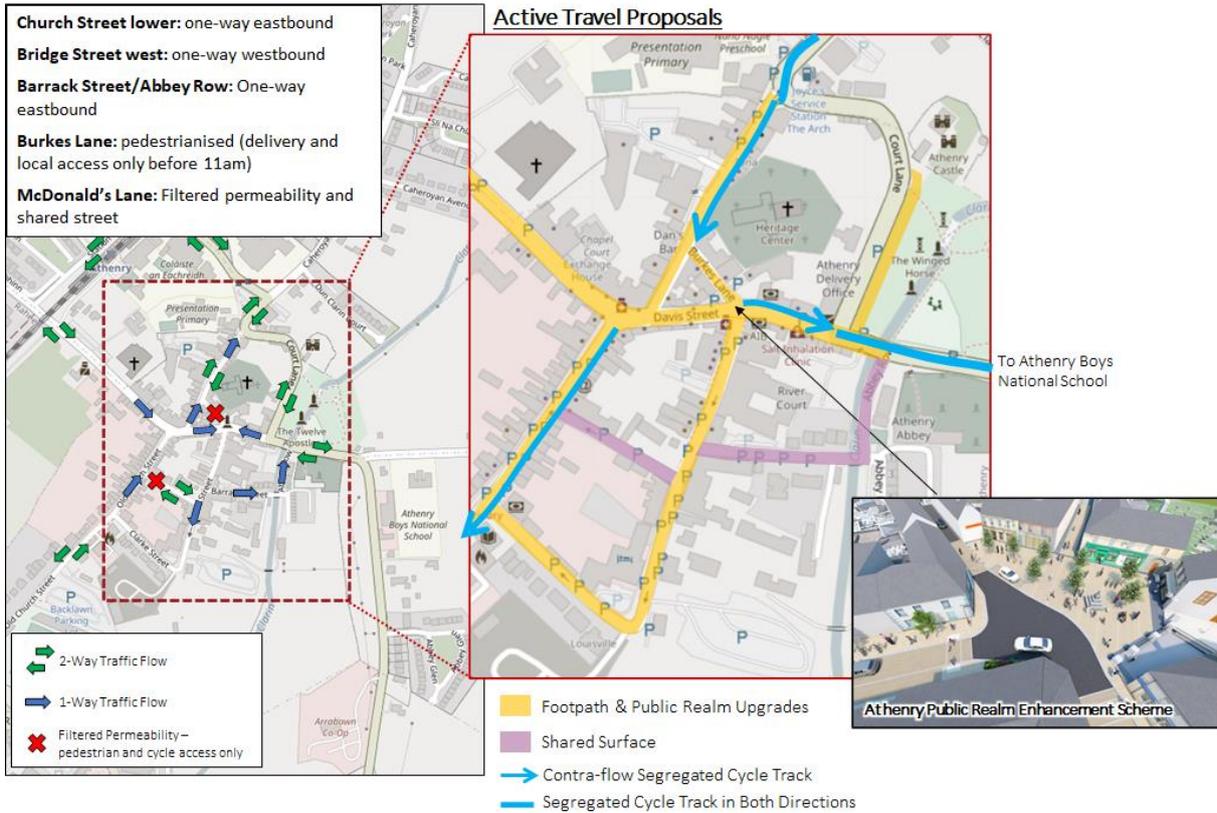


Figure 6-5: Town Centre Circulation and Active Travel Proposals

Market Square & Cross Street

A first step towards improved public realm in Athenry's Town Centre is being taken as part of the upcoming Athenry Public Realm Enhancement Scheme. As part of the scheme, Burkes Lane will be pedestrianised (with access for deliveries before 11am). Parking on the square will be removed bar a drop-off/pick-up point and a pedestrian plaza created on Market Square. It is intended that the public realm scheme will be submitted for planning early in the near future and, subject to approval, will begin construction in 2024.



Figure 6-6: Market Square Proposals as part of the Athenry Public Realm Enhancement Scheme

GCC are also progressing upgrades on Cross Street. This includes more formalised parking arrangements along with footpath upgrades and public realm enhancements.

Bridge Street

Bridge Street is the main connection from the east of the town into the proposed Market Square plaza. It currently operates two-way for vehicular traffic, however, there is insufficient space for vehicles to pass each other safely due to the narrow carriageway widths and on-street parking and loading bays. Footpaths are also extremely narrow in places creating an unattractive environment for pedestrians.

As part of the future delivery of active travel infrastructure connecting from Market Square to Athenry Boys National School, it is proposed that Bridge Street be converted to 1-way westbound for vehicular traffic entering the town centre.

This will allow for reallocation of road space to provide improved footpaths and an eastbound contra-flow segregated cycle lane. This will help provide a safe walking and cycling connection to the planned Market Square plaza. Combined with wider measures on Bridge Street and the Safe Route to School proposals, this will facilitate a continuous safe connection between the Athenry Boys National School and the town centre.



Figure 6-7: Bridge Street Existing Layout

Church Street

Figure 6-8 illustrates the existing layout of Church Street at the connection with Davis Street and Old Church Street. Currently, it accommodates traffic movements in both directions. However, the narrow carriageway results in both carriageway and footpath widths considerably below the standards set out within the Design Manual for Urban Roads and Streets (DMURS) guidance. This leads to vehicles mounting the footpaths to pass each other creating a safety hazard for pedestrians. The footpaths along this section of road on access to the town centre are also extremely narrow with insufficient space for pedestrians to pass each other safely or to facilitate safe access for pedestrians with mobility impairments.



Figure 6-8: Church Street Existing Layout

In order to overcome these issues, it is proposed that Church Street be converted to 1-way at its eastern end for traffic heading eastbound towards the town centre. This will remove the dangerous manoeuvre for vehicles attempting to pass each other on this narrow stretch of road, whilst providing additional space to significantly upgrade the footpaths for pedestrians accessing the town centre.

North Gate Street

North Gate Street is an important link in the Athenry town centre network connecting from the school campus and the R347 to the heart of the town on Market Square where public realm upgrades are planned. It is currently lined with local businesses and framed at the northern end by the old medieval town wall. However, currently North Gate Street is dominated by on-street parking with very narrow footpaths in places creating a generally unattractive environment for pedestrians and cyclists.

The proposed option for North Gate Street is illustrated in Figure 6-9 and includes the improvement of the public realm and active travel environment along the street through widened pedestrian areas and public realm works, as well as provision of a contra-flow cycle track to the junction with Burkes Lane, facilitating onwards travel to Market Square.

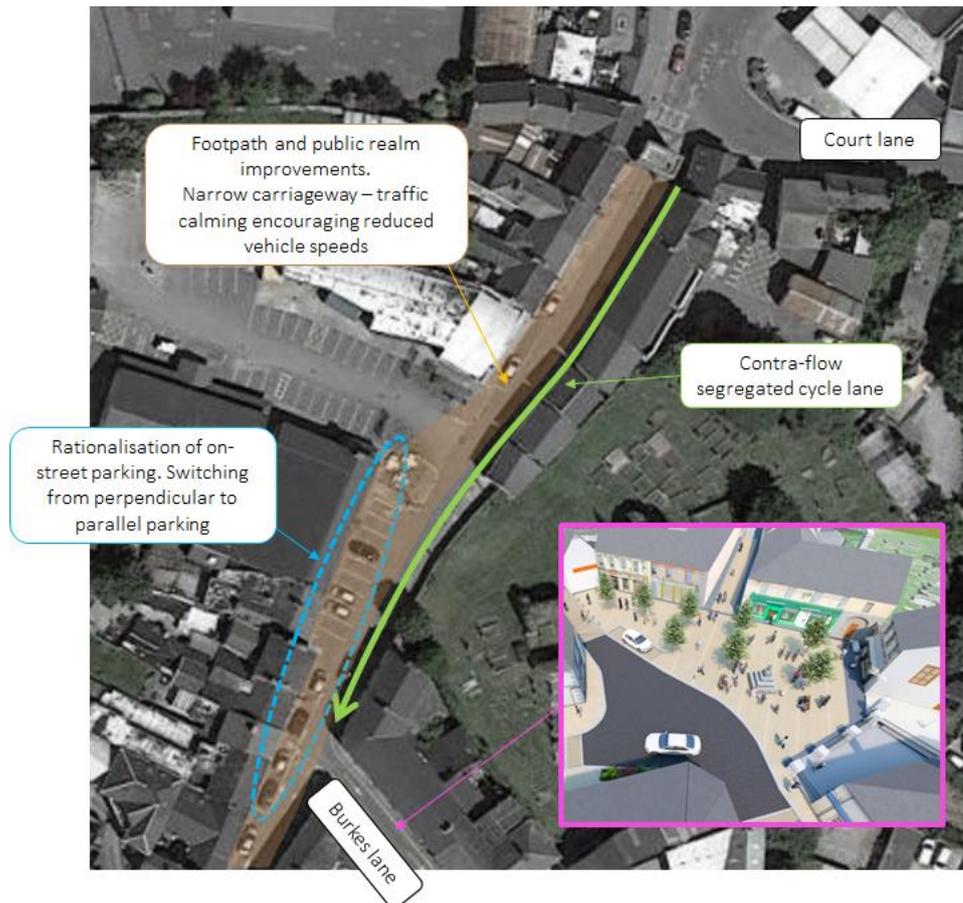


Figure 6-9: North Gate Street Proposals

The proposals for North Gate Street should transform this area into an attractive and vibrant location framed by the old town gate. Footpath upgrades with public realm enhancements will create a nicer environment for pedestrians and for people to spend time on North Gate Street. The introduction of a contra-flow cycle lane will provide safe access for cyclists towards the town centre and the planned upgrades to Market Square and Burkes Lane. Overall, this should encourage increased walking and cycling to the town centre via North Gate Street, and support local businesses along the route. Whilst the proposals may require some rationalisation of parking, there is a large off-street car park available along North Gate Street where any parking removed could potentially be reallocated.

Old Church Street

The proposals for Old Church Street include the reallocation of road space to deliver:

- A contra-flow cycle track from the junction with Church Street to Clarke Street continuing down to the R348 (Prospect); and
- Footpath and public realm upgrades along Old Church Street.

The proposed upgrades for Old Church Street will provide a significant improvement in the public realm and walking environment on the street as a result of the wider, more comfortable footpaths, meeting national policy on promotion of active travel, improved urban public realm and a reduction in car dominance in town centres.

The delivery of a segregated contra-flow cycle track will facilitate safe cycle movements in both directions along Church Street resulting in reduced travel distances and journey times for cyclists. The

reduction in carriageway widths, along with cycle infrastructure provision, will help to reduce traffic speeds along the street improving general safety for pedestrians and cyclists and creating an improved town centre environment.

The provision of upgraded active travel infrastructure along Old Church Street will improve connectivity for pedestrians and cyclists from the town centre further south to Kenny Park as well as shops and businesses along the R348 (Prospect) via the proposed town wall walk. It will also improve access from the town centre to Clarin College via the permeability link through Lorro Gate residential estate.

The space for this improved walking and cycling infrastructure will mostly come from a reduction in carriageway width (including removal of the left filter lane at the Church Street junction which would no longer be required due to the 1-way system proposed). Where reducing carriageway widths is not sufficient to deliver these measures, localised reductions in on-street parking may be required. It is envisaged that any spaces removed could be reallocated to the large Backlawn Car Park located nearby to the south. It is assumed that high-quality disabled parking bays will be prioritised for Old-Church Street in any designs.

McDonald’s Lane

McDonald’s Lane is a narrow one-way street connecting Cross Street to Old Church Street within the town centre. At the western end of the lane, existing building layouts create an unsafe environment for pedestrians. There is very poor visibility for pedestrians on Old Church Street to see traffic exiting from McDonald’s Lane onto Old Church Street. There are also no footpaths provided at this pinch point for pedestrians using McDonald’s Lane to access Old Church Street as illustrated in Figure 6-10.



Figure 6-10: McDonald’s Lane Existing Layout

It is proposed that McDonald’s Lane is closed for vehicular traffic at the western end on access to Old Church Street, with two way access retained for residents on the street. This will allow for the creation of a shared street on McDonald’s Lane which will be very low-trafficked and provide a safe connection for pedestrians and cyclists from Cross Street to Old Church Street. It is envisaged that two-way local access will be provided for vehicles along McDonald’s Lane to off-street residential parking which will be prioritised for mobility impaired residents. There may be some reallocation of existing on-street parking required to nearby streets.

Barrack Street & Abbey Row

Barrack Street and Abbey Row are narrow residential streets in the heart of Athenry town centre. These roads currently operates with traffic in both directions, however, with parking on street, it often acts as an informal 1-way as it is not feasible for two cars to pass each other on certain sections.



Figure 6-11: Abbey Row Existing Layout

Pedestrian facilities are also poor. There are no footpaths on either side of Abbey Row. On Barrack

Street there are footpaths along some sections but these are well below minimum width standards.

In order to improve the environment for pedestrians and cyclists, it is proposed to convert Barrack Street and Abbey Row to 1-way traffic only in an eastbound direction. Public realm upgrades are proposed along the route including elements such as pavement treatments and traffic calming measures to promote its function as a residential street rather than a through route for vehicular traffic.

Traffic survey data and modelling analysis indicates that the volume of traffic using Barrack Street and Abbey Row is very low, mainly providing access to local residences and businesses. These low traffic volumes along with slow speeds would allow for the creation of a shared space environment where pedestrians, cyclists and vehicles could share the carriageway. This would provide a safe route for active travel providing a connection to the town centre and also Athenry Community Park and playground off Bridget Street. This has the potential to be an extremely attractive route with the Clarin river running along Abbey Street and the historic Church also located along the route.

6.2.3 Other Key Proposed Active Travel Links

Figure 6-12 illustrates some additional key active travel routes proposed as part of the Athenry LTP. These links, combined with the railway crossings and town centre improvements detailed above, will provide the backbone of a network of safe active travel facilities in Athenry.

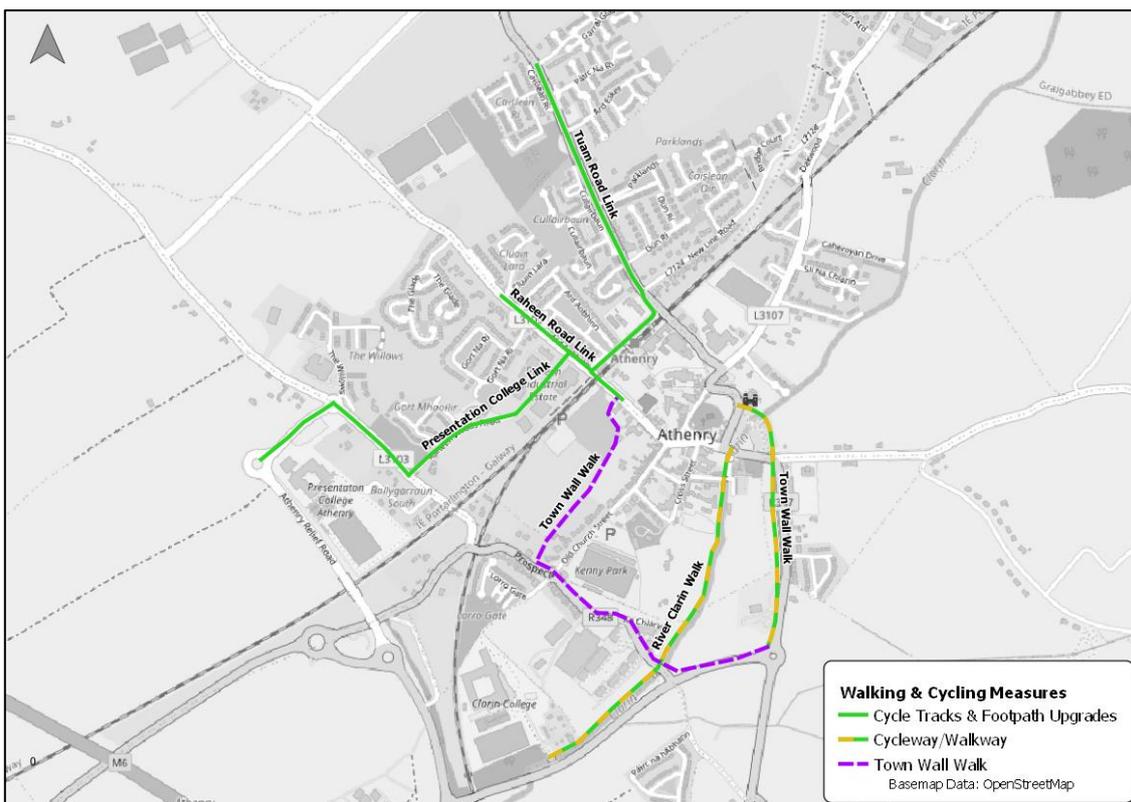


Figure 6-12: Key Active Travel Links

The Presentation College Link provides segregated cycle tracks and upgraded footpaths between Presentation College and the railway station via the L3103, Raheen Woods Road and Raheen Road. Junctions along the link will also be upgraded to provide safe crossings for people walking and cycling. Similar upgrades are proposed for the Tuam Road, Raheen Road and Station Road. As can be seen in the figure above, these routes combine together to form a network of safe links providing connections

from the residential areas to the north of Athenry to the train station and Presentation College for children walking and cycling to school. When combined with other proposals within the LTP including the active travel bridge on Station Road and potential onward connections through the school campus, they will create an attractive walk and cycle network linking residential areas to schools and the town centre. This will help support a shift towards active travel and away from the car for shorter distance trips within the town.

Two other key active travel and leisure routes proposed are the Town Wall Walk, leveraging Athenry's Medieval History, and the River Clarin Walk. Both of these routes will provide high-quality leisure facilities for residents of Athenry, as well as transport links on desire lines that couldn't otherwise be provided. The map in Figure 6-12 above shows the proposed route for these links.

The River Clarin Walk provides a safe, segregated walking and cycling link from the town centre directly to both Athenry Shopping Centre and Clarin College, two major destinations. The Town Wall Walk provides safe walking and cycling facilities along the R347 into town, as well as along Prospect and potentially bypassing the narrow Old Church Street towards the railway station. It should be noted that the mapped routes are indicative only and would require detailed feasibility assessment prior to being delivered.

6.2.4 Connections to Future Zoned Land

As outlined previously in Section 4.3, the proposed LTP measures considered access to existing development but also took cognisance of the draft Athenry land use zoning illustrated in Figure 6-13. This was to ensure that all future zoned land are served by strong active travel infrastructure to support the sustainable growth of Athenry.

Where new development is proposed to take place on future zoned land in Athenry, active travel and public transport measures proposed within the LTP serving the relevant lands will be delivered in a timely fashion to support the sustainable development of these areas. Through the planning process, all new major residential or employment developments (including expansion of existing) in Athenry, will be required to provide active travel infrastructure throughout the proposed developments, integrated with the wider active travel network and the proposed set of measures outlined in this LTP. This is to ensure future residents/employees are provided with a choice of sustainable transport modes at the outset, and that connectivity across the network is maintained as Athenry is developed into the future.

Residential Lands

The majority of the zoned Residential Phase 1 lands will be served by proposed segregated cycle facilities and footpath upgrades along the R347 Tuam Road, L3105, Raheen Woods Road and the L3103. As outlined earlier in this chapter, these routes provide a connection to the wider active travel network linking to Presentation College, Athenry Train Station, schools south of the rail line and the town centre.

The largest bank of Residential Phase 2 land is located to the north of the town between the R347 and Cúirt Ard. If this land is developed, it is recommended that access is provided onto the R347 Tuam Road to connect to the safe walk and cycle infrastructure along this road. This would provide an onward connection to schools and the town centre.

It is also recommended that active travel connections are permitted through existing residential areas to the south to provide a link on the New Line. As part of the LTP, New Line is being promoted as a safe, quiet residential street for active travel. Any access to the east of the Phase 2 lands would require an upgrade of Cúirt Ard including the crossing of the rail line.

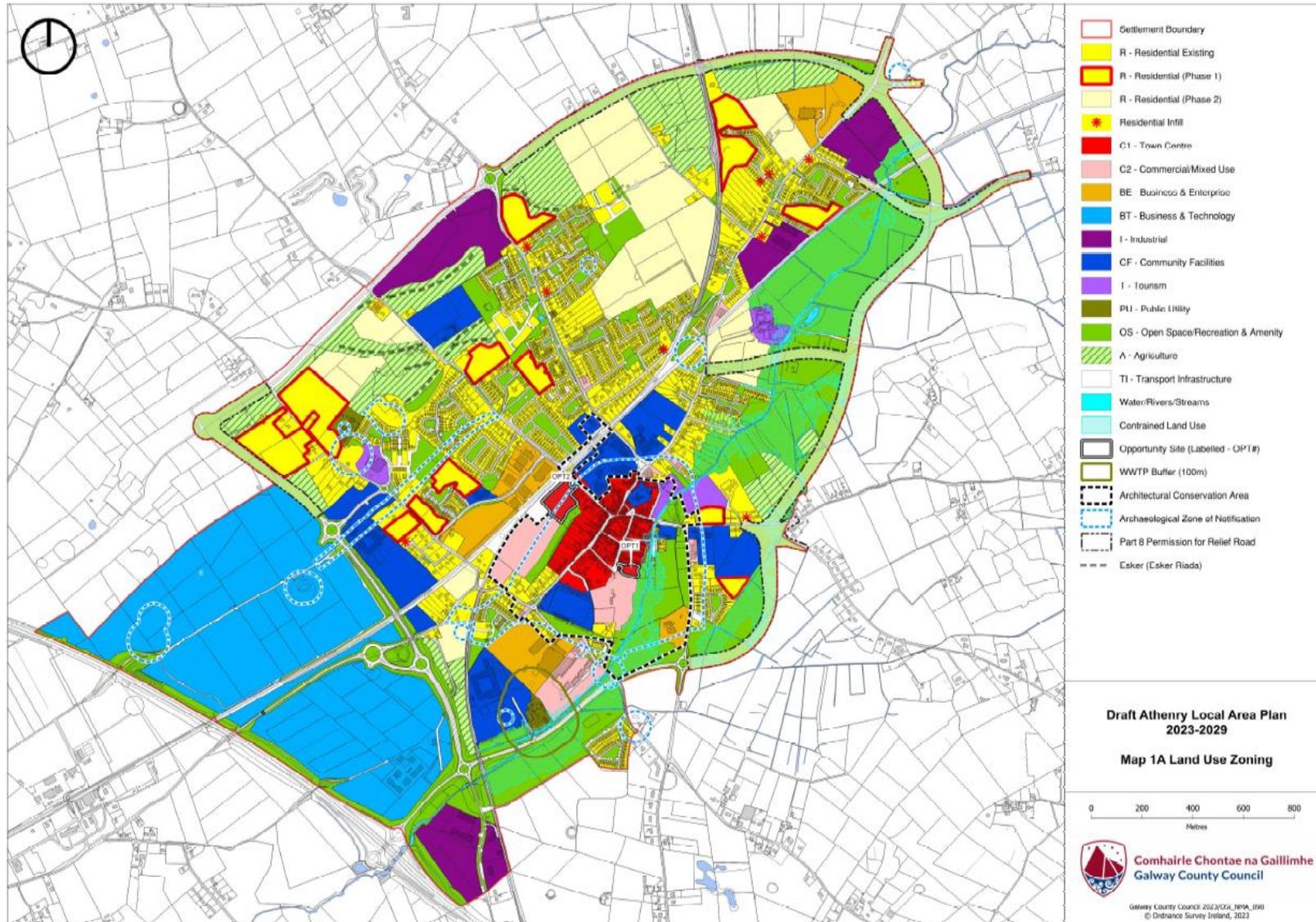


Figure 6-13: Draft Athenry Land Use Zoning Map

Employment Lands

The largest bank of zoned employment land is located to the southwest of the town close to the M6 interchange and the R348. As illustrated in Figure 6-1, these lands will be served by proposed footpath upgrades and segregated cycle facilities along the R348. Combined with the wider active travel network, the LTP proposes a strong walk and cycle network connecting these lands to residential areas along with the town centre.

To the north of the town near Ballydavid there are also lands zoned for ‘Industrial’ and ‘Business & Enterprise’. These lands are served by the L3107 Caheroyan Road which is proposed for traffic calming and footpath upgrades as part of the LTP. This will help to improve the safety for access to these lands by walking and cycling. They would also benefit from the proposed completion of the western bypass of the town with associated segregated walk and cycle facilities.

6.3 Public Transport

The public transport measures proposed in the plan are focused on medium and longer distance trips to and from the study area. The town was considered too small for the provision of a town bus services, with these shorter distance trips better served by active travel.

Athenry is strategically located in terms of rail transport, at the junction of the Galway-Dublin line and the Western Rail Corridor. This provides the most significant opportunity for the development of public transport services in Athenry, building on the projects ongoing to improve capacity on the Athenry-Galway line.

The main public transport measures for rail included in the Athenry LTP are aligned with the following GCDP 2022-2028 Policy Objectives:

- To secure in co-operation with relevant stakeholders (e.g. Iarnród Éireann & NTA) improved rail infrastructure and services between Galway and Athlone, which includes a dual railway track and additional improvement works to include an additional platform and passing loop at Garraun, Oranmore to ensure enhanced capacity and frequency of service;
- To support the opening of the Western Rail Corridor route from Athenry, Tuam, Claremorris to Collooney as an option for passenger and cargo transportation; and
- To support the addition of Loughrea to the Western Rail Corridor and to plan for the addition of a commuter route from Loughrea to Galway by linking Loughrea to either Attymon or Athenry train station to create a commuter tributary to Galway.

The proposed LTP active travel network has also been developed to provide better access for residents of Athenry to the train station by walking and cycling. This should be combined with additional safe cycle parking facilities at the station to support cycle and rail trips.

From a bus perspective, the LTP proposes engagement with the NTA on the provision of bus services through their ‘Connecting Ireland’ and ‘Local Link’ programmes connecting to surrounding towns not currently served by rail. The Athenry LTP also proposes the upgrade of waiting infrastructure and passenger information at all bus stops within the town.

6.4 Road & Traffic Management Options

As outlined in Section 6.2.2, a number of traffic management arrangements have been proposed within Athenry town centre to support walking, cycling and public realm improvements. These include one-way systems on Bridge Street, Church Street, Barrack Street and Abbey Row along with the closure of certain streets for non-local vehicular traffic.

The completion of the Athenry Relief Road, as illustrated in Figure 6-14, is a Policy Objective in the GCDP 2022-2028. **The entirety of the Athenry Relief Road has Part 8 Planning Permission already and this Local Transport Plan, and the associated Athenry Local Area Plan, merely recognises that permission.** The Athenry Relief Road Phase 2 (R01) is currently being delivered by GCC. Priority is **likely to be given by Galway County Council** to completion of the western section of the Athenry Relief Road (R02) as a longer term measure to provide a full bypass of the town. This includes the upgrade of the existing L7125 which is a sub-standard road along with the delivery of segregated pedestrian and cycle facilities. In addition to reducing town centre traffic, this would provide an orbital active mode connection for residents to employment lands and schools to the northeast and southwest of the town.

The delivery of the eastern section of the Athenry Relief Road (R03) is likely to be beyond the lifetime of this LTP. As such, it is a recommendation of the plan that this corridor is preserved and the need for the road is reassessed as Athenry continues to grow beyond the current draft LAP.

The LTP also proposes the upgrade of a number of junctions throughout the town to improve safety for all road users. The current transport network in Athenry is often difficult to traverse for pedestrians and cyclists, with few formal crossings provided in the town and most junctions featuring wide, splayed turns for cars leaving long crossing distances for pedestrians and hazards for cyclists from turning vehicles. As the active travel measures illustrated in Figure 6-1 are delivered, all junctions along the routes will need to be reviewed and upgraded to provide safe access for pedestrians and cyclists. Exact details on proposed upgrade works will be defined at the individual project level.

6.5 Supporting Measures

A number of supporting measures have been proposed in the LTP to compliment the transport network improvements and support modal shift. These measures include a number of park and stride sites on the periphery of the town centre to reduce congestion at the school gate, the roll out of cycle parking, provision of improved bus stop infrastructure, and a range of behavioural change measures including mobility management plans. A full list of supporting measures included in the Emerging Preferred Strategy can be found in Appendix C.

- Church Street lower: One-way eastbound
- Bridge Street west: One-way westbound
- Barrack Street/Abbey Row: One-way eastbound
- Burkes Lane: Pedestrianised (local delivery access)
- McDonald's Lane: Filtered permeability and shared street

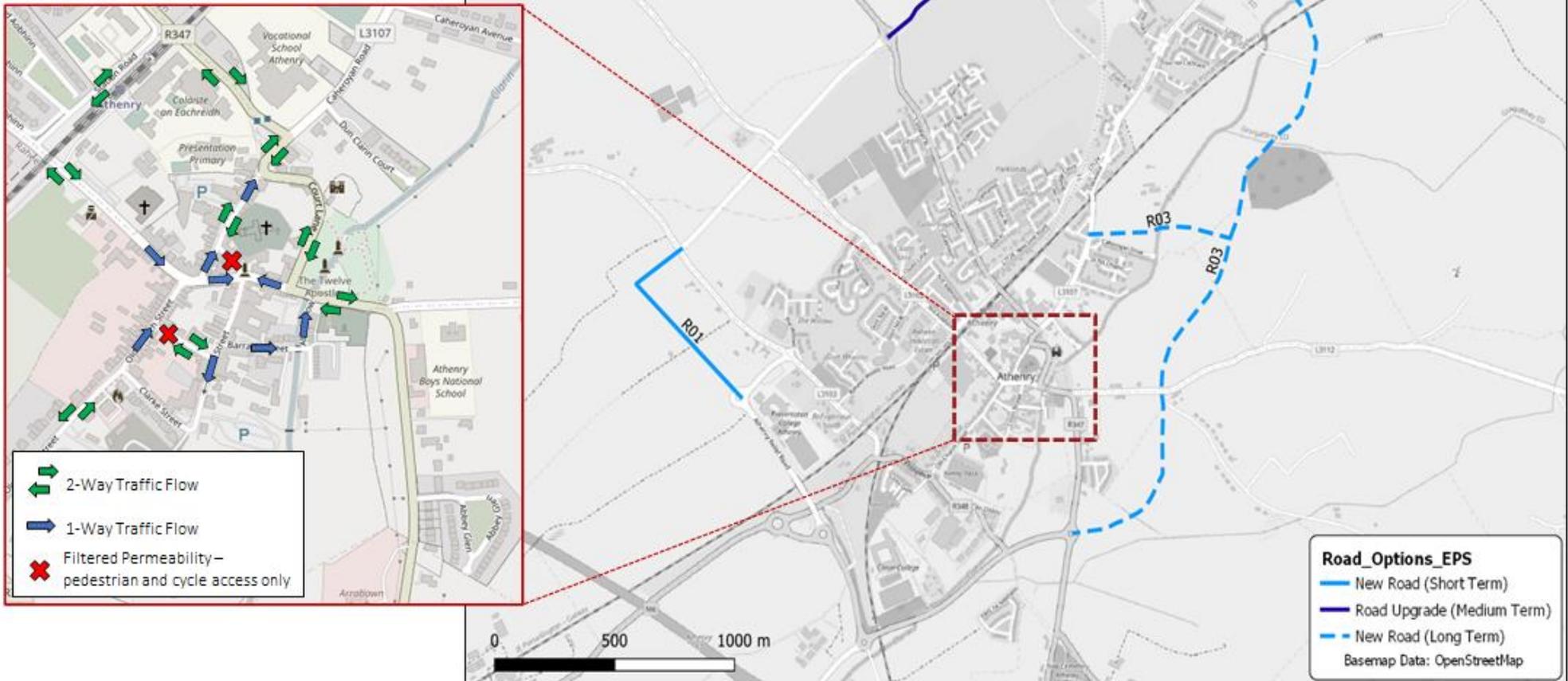


Figure 6-14: Emerging Preferred Strategy Road Infrastructure Measures

6.6 KPI Assessment

The draft Emerging Transport Strategy as a whole has been assessed against the objectives and KPIs listed in Table 4-1. The strategy has been assessed against an existing ‘Do Nothing’ scenario using the 5-point rating scale outlined in Table 5-1. The following sections provide an overview of the performance of the draft Emerging Preferred Strategy in meeting the overarching study objectives.

6.6.1 Accessibility & Social Inclusion

Table 6-1: Emerging Preferred Strategy Accessibility & Social Inclusion Outcomes

OBJECTIVE	KPI	SCORE
Support and implement transport measures which reduce car dependency and improve access to local services by sustainable modes	Access to key services (ATOS Analysis)	
	Access to Public Transport	

As outlined in Figure 6-1, the Emerging Preferred Strategy for Athenry includes the creation of an integrated active travel network providing improved accessibility to key services including the town centre and local schools. Strong pedestrian and cycle linkages are proposed to existing, as well as future planned employment locations within the town to support sustainable travel to work. Local permeability improvements have been identified, providing connectivity particularly for residential areas to the north of the rail line substantially reducing access times to key services by walking and cycling. The NTA’s ATOS tool was re-run for the future Emerging Preferred network proposed as part of the LTP. These maps are provided in Appendix D and illustrate the improvement in accessibility to services within Athenry as a result of the LTP measures.

The Emerging Preferred Strategy includes significant improvement to public transport such as frequency increases on existing services, the reopening of northern sections of the Western Rail Corridor and exploration of new bus services. Active Travel measures in the strategy will improve walking and cycling accessibility to rail and bus stops. It also includes supporting measures which will improve the quality of bus stop infrastructure in the town and the quantum of cycle parking at public transport stops/stations.

6.6.2 Integration

Table 6-2: Emerging Preferred Strategy Integration Outcomes

OBJECTIVE	KPI	SCORE
To align and integrate with existing and emerging national, regional, and local planning policy	Compatibility of transport measures with local, regional and national policy - Rating Scale	

The focus of the Emerging Preferred Strategy on active modes and urban realm enhancements is deemed to comply with national and regional policy as covered in Chapter 2. In particular, the town centre improvements align with the Town Centre First policy and active travel improvements align with the focus by the Department of Transport on Safe Routes to School. The overall rebalancing of the transport network towards sustainable modes aligns with the National Planning Framework, National Sustainable Mobility Policy, the Climate Action Plan 2023, the Regional Spatial and Economic Strategy and the GCDP 2022-2028.

6.6.3 Safety & Physical Activity

Table 6-3: Emerging Preferred Strategy Safety & Physical Activity Outcomes

OBJECTIVE	KPI	SCORE
Provide safe access to schools for vulnerable road users and ensure a safe front of school environment	Qualitative assessment of walking and cycling infrastructure to schools - Rating Scale	
	Reduction in walking/cycling distances to school sites (GIS/ATOS assessment)	

The Emerging Preferred Strategy has a significant focus on providing safe routes to school by active modes. Examples of this include new or improved walking and cycle infrastructure on the Tuam Road, Raheen Road, Raheen Woods Road, R348 and the River Clarin Walk as well as the significant provision of an active travel railway crossing in the vicinity of the Tuam Road.

In addition, a number of streets in the town centre currently feature dangerously narrow, or even no footpaths. The Emerging Preferred Strategy proposes reallocation of road space and traffic management measures to provide continuous and safe walking and cycling facilities. These measures will provide a step-change in the quality and safety of active travel infrastructure for all trips through the town, including school trips.

The ATOS tool was re-run with the future LTP active travel network to illustrate the impact of the proposed measures on access to schools. Figure 6-15 outlines the results for walk access⁸ to post-primary schools within Athenry. The results highlight a significant increase in accessibility due to the proposed LTP active travel network with substantially more areas within the town scoring A or B.

⁸ Results for walk and cycle access to primary schools is provided in Appendix D

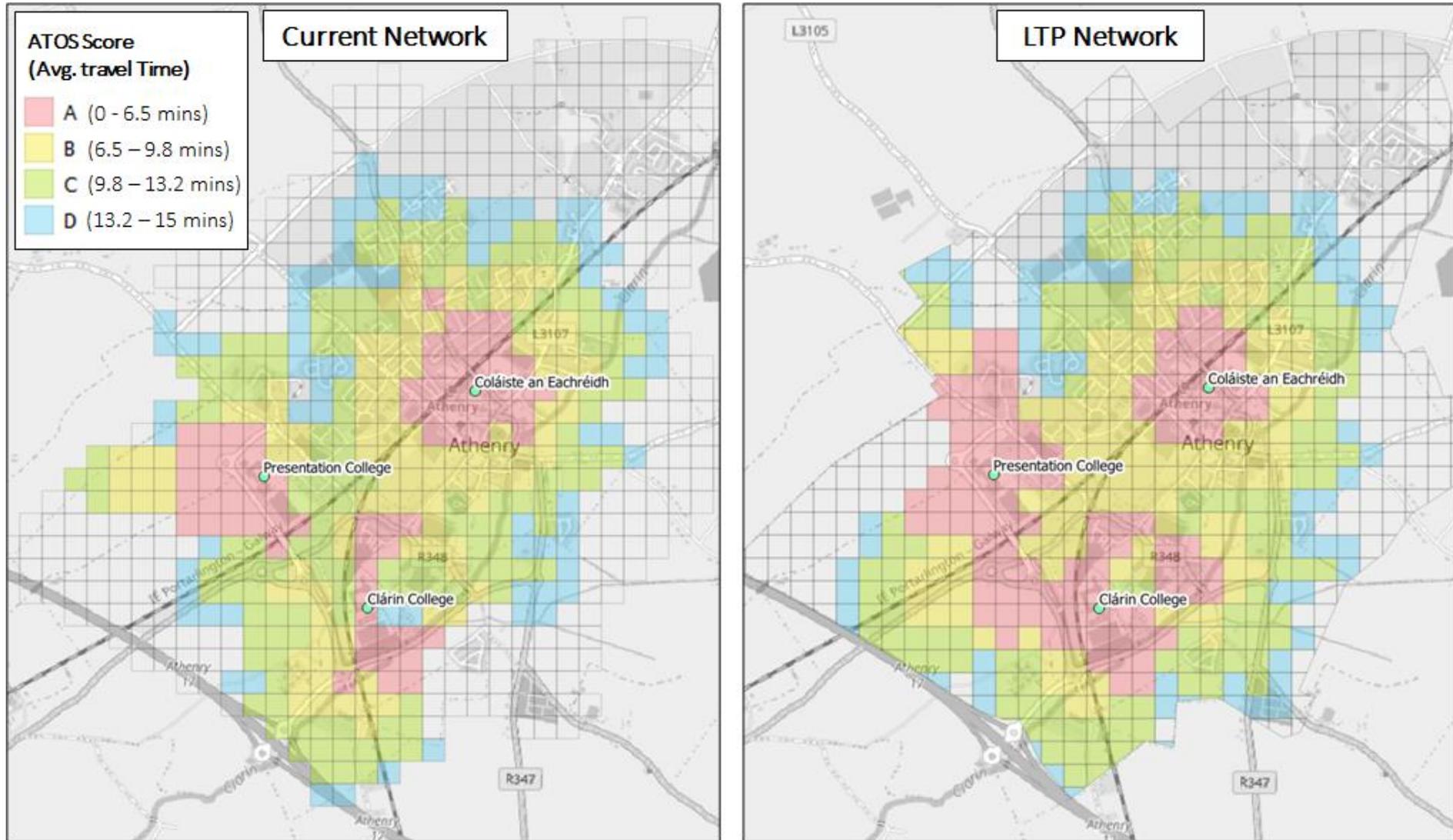


Figure 6-15: ATOS Walk Access to Post-Primary Schools Results (existing vs LTP network)

6.6.4 Environment

Table 6-4: Emerging Preferred Strategy Environment Outcomes

OBJECTIVE	KPI	SCORE
Contribute to achieving Climate Action Plan targets through the creation of an environment which encourages a modal shift from the private car to more sustainable modes	Anticipated change on sustainable mode shares - Rating Scale	
	Length of additional / improved walk and cycle infrastructure	

The Emerging Preferred Strategy will deliver enhanced sustainable connectivity across Athenry, supporting environmental improvements through reductions in carbon emissions, improving local air quality and enhancing the public realm to support active travel. The provision of a wider network of safe pedestrian and cycle infrastructure should help encourage a modal shift to active travel, particularly for short distance trips within Athenry.

The Emerging Preferred Strategy includes over 22km of new and upgraded walking and cycling infrastructure, delivering a considerable increase in the potential for safe active travel trips in Athenry. The increase is most notable in cycling infrastructure, with over 19km of new cycling infrastructure provided against a current network of 3.5km.

6.6.5 Economy

Table 6-5: Emerging Preferred Strategy Economy Outcomes

OBJECTIVE	KPI	SCORE
Contribute to Athenry's economic vitality through improved connectivity and enhanced public realm	Access to Town Centre	
	Quality of Town centre streetscape and public realm – Rating Scale	
	Deliverability Rating Scale	

While the Emerging Preferred Strategy does involve changes to the town centre circulation patterns for motor traffic and requirements for rerouting to complete some trips, this is compensated by a step change in accessibility to the town centre by sustainable modes, cycling in particular. The reallocation of road space enabled by these traffic management changes results in an improved walking environment on a number of streets where footpath provision was substandard or even non-existent.

The delivery of the Market Square plaza, along with wider improvements to footpaths throughout the town centre will result in a significant improvement to the town centre's public realm. This will make

Athenry a more attractive place to spend time, increasing footfall within the town centre and supporting local businesses.

The vast majority of measures in the Emerging Preferred Strategy involve reallocation of existing road space to active travel measures and are therefore cost effective and can be delivered in a short timeframe. These short term measures are focussed on providing strong connections from residential areas to key attractions in the town, notably the town centre, schools and employment sites.

Some longer term proposals will require significant resources in terms of both design and construction. This would include elements such as the proposed new active travel bridge over the rail line along with the delivery of the Clarinbridge River walk. There are also a number of options proposed for traffic management within the town centre which need to be investigated in further detail to determine their acceptability and overall deliverability.

7. MONITORING STRATEGY & LTP REVIEW

A Monitoring and Evaluation Plan will be developed and implemented as part of the delivery process for the Athenry LTP. This will monitor mode share ambitions and benchmark performance during the plan period.

The NTA guidance recommends undertaking reviews during defined timeframes (e.g. short term 1-2 years; medium 2-5 years; long term 5 to 10 years; future-term 10 to 15 years). At the end of each timeframe, monitoring can be conducted to establish the following:

- Progress on the implementation of all infrastructure measures for each mode of transport.
- Progress on the implementation of all public transport service measures for each mode of transport.
- Progress on the implementation of all demand management and supporting smarter travel measures.
- Cross-checking of assumptions in the ABTA against current transport patterns and population at the time of monitoring.
- Assessment of actual development and land use outcomes within the ABTA Study Area at the time of monitoring against the original ABTA assumptions related to land use.

Evaluation of the outcomes of the ABTA can also be undertaken within similar timeframes including evaluating the following:

- Sustainable Travel Mode Share – for example via updated Census POWSCAR data, Employment and School Mobility Management Plan data, local residents' surveys, cycling and walking counts and bus patronage data.
- Economic Benefits – for example via town centre footfall and spend surveys, distinguishing between those who travelled to the town centre by car and by sustainable means.
- Health and Safety Benefits – for example via analysis of available local road safety statistics.
- Environmental Benefits – for example via Air Quality and Noise monitors at key locations within the Town Centre and usage of public Electric Vehicle car charging and eBike parking facilities. User surveys can also be conducted to determine user satisfaction levels with new active travel infrastructure and public transport services and waiting environments.
- Accessibility and Social Inclusion – updated catchment analysis for access into and within town centre, including for those without access to a car.

8. SUMMARY

8.1 Overview

This report outlines the process undertaken to develop the draft Athenry Local Transport Plan (LTP) for consultation. The key purpose of the LTP is to guide the future transport and mobility needs of Athenry, taking into account the transport demand arising from existing and projected development both within the study area and the wider area of influence.

In developing the LTP, SYSTRA have followed guidelines set out in TII/NTA's 'Area Based Transport Assessment (ABTA) Guidance Notes. A detailed Baseline Assessment was undertaken to understand existing conditions within Athenry along with potential opportunities and constraints. Core study objectives were identified for the Athenry LTP grounded in National, Regional and Local policy.

Through site visits, and a review of existing conditions and relevant policies and plans, a long-list of proposed measures were identified to support the future transport needs of Athenry. These options were passed through a detail options assessment process to determine the package of measures that would form the draft Athenry LTP for consultation. The full set of draft strategy measures were assessed against the study objectives using identified Key Performance Indicators.

The results indicate that the draft LTP measures score very positively in meeting the overarching LTP objectives. The delivery of a safe, integrated walk and cycle network will improve accessibility across Athenry encouraging an increase in sustainable travel. A number of measures have focused on improving safety for access to local schools, supporting active travel and improving the health and wellbeing of children within the town. Measures within the town centre are focused on improving public realm and the pedestrian environment with footpath and junction upgrades. This will make Athenry a nicer place to be and spend time, increasing footfall within the town centre. In terms of wider accessibility, the draft LTP includes upgrades to existing public transport services and facilities, including improved frequencies of trains to Galway along with a potential wider expansion of the rail network.

SYSTRA provides advice on transport, to central, regional and local government, agencies, developers, operators and financiers.

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Madrid, Rabat, Rome, Sofia, Tunis

Middle East:

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Asia Pacific:

Bangkok, Beijing, Brisbane, Delhi, Hanoi, Hong Kong, Manila,
Seoul, Shanghai, Singapore, Shenzhen, Taipei

Africa:

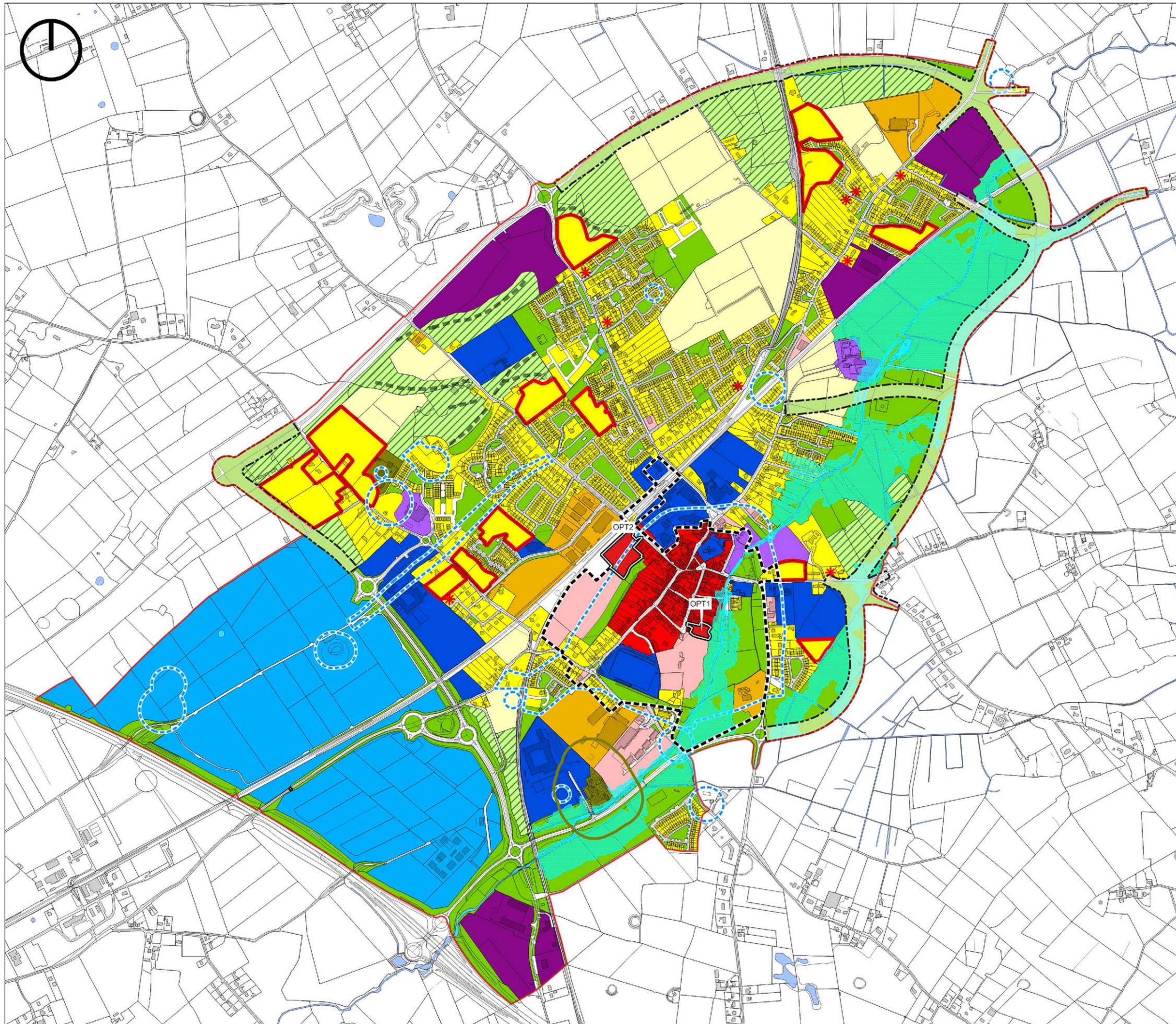
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Latin America:

Lima, Mexico, Rio de Janeiro, Santiago, São Paulo

North America:

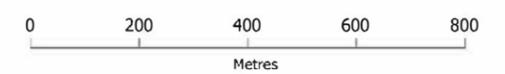
Little Falls, Los Angeles, Montreal, New-York, Philadelphia,
Washington

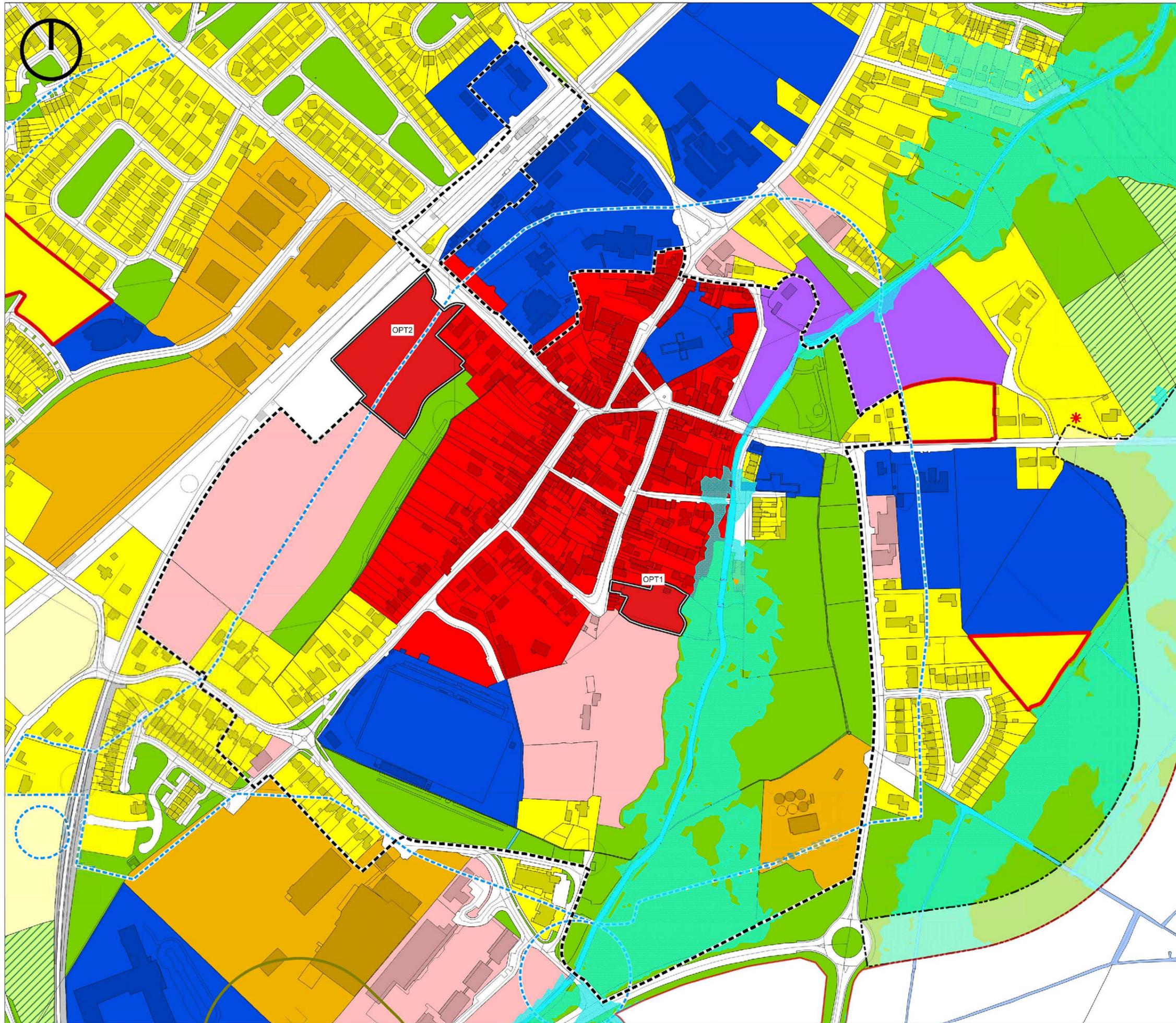


- Settlement Boundary
- R - Residential Existing
- R - Residential (Phase 1)
- R - Residential (Phase 2)
- * Residential Infill
- C1 - Town Centre
- C2 - Commercial/Mixed Use
- BE - Business & Enterprise
- BT - Business & Technology
- I - Industrial
- CF - Community Facilities
- T - Tourism
- PU - Public Utility
- OS - Open Space/Recreation & Amenity
- A - Agriculture
- TI - Transport Infrastructure
- Water/Rivers/Streams
- Constrained Land Use (Flood Zones A & B)
- Opportunity Site (Labelled - OPT#)
- WWTP Buffer (100m)
- Architectural Conservation Area
- Archaeological Zone of Notification
- Part 8 Permission for Relief Road
- Esker (Esker Riada)

**Draft Athenry Local Area Plan
2023-2029**

Appendix D Flood Zone A and B

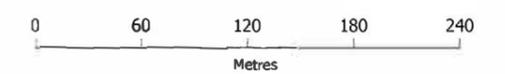




-  Settlement Boundary
-  R - Residential Existing
-  R - Residential (Phase 1)
-  R - Residential (Phase 2)
-  Residential Infill
-  C1 - Town Centre
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**Draft Athenry Local Area Plan
2023-2029**

Appendix D Flood Zone A and B

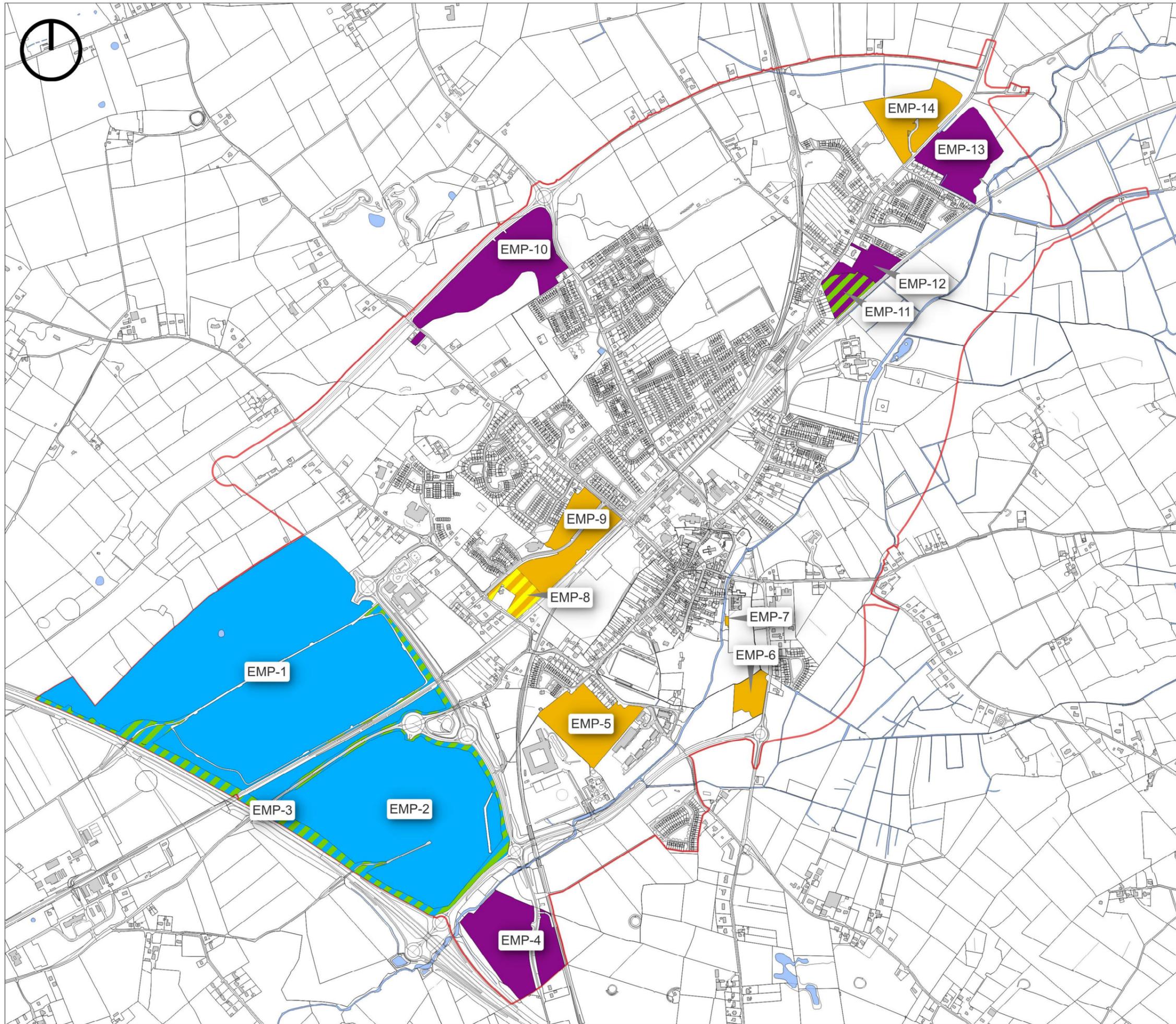


Appendix E – Infrastructure Assessment-Proposed Employment Lands

Appendix 3 of Project Ireland 2040; National Planning Framework (NPF) sets out a methodology for a two-tier approach for zoning of land which is informed by an Infrastructural Assessment, which must identify “the potential for delivery of the required services and/or capacity to support new development must be identified and specific details provided by the Planning Authority at the time of publication of both the draft and final development or local area plan”.

The NPF defines Tier 1 and 2 lands as follows; Tier 1: Serviced Zoned Land, comprising lands that are able to connect to existing development services for which there is service capacity available and can therefore accommodate new development; and Tier 2: Serviceable Zoned Land, comprising lands that are not currently sufficiently serviced to support new development but have the potential to become fully serviced within the life of the plan. It states that Tier 1 lands will generally be positioned within the existing built up footprint of the settlement or contiguous to existing developed lands and inclusion in Tier 1 will generally require the lands to be within the footprint or spatially sequential within the identified settlement. It should be noted that the NPF refers to ‘development services’ as “road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply for which there is capacity available and can therefore accommodate new development.” The NPF requires that where lands are identified as Tier 2 lands, the potential for delivery of the required services and/or capacity to support new development must be identified and specific details provided by the planning authority at the time of publication of the draft and final local area plan. This infrastructural assessment must be aligned with the approved infrastructural investment programme(s) of the relevant delivery agency(ies), or be based on a written commitment by the relevant delivery agency to provide the identified infrastructure within a specified timescale (i.e. within the lifetime of the plan). The Planning Authority may also commit to the delivery of the required and identified infrastructure in its own infrastructural investment programme (i.e. Budgeted Capital Programme) in order to support certain lands for zoning. The infrastructural assessment must include a reasonable estimate of the full cost of delivery of the required infrastructure to the identified zoned lands.).

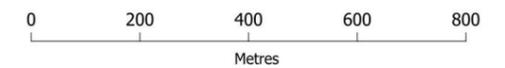
		Compact Growth	Infrastructure & Services	Physical Suitability		
		Within existing settlement Infill/consolidation Proximity to town centre Promotes sustainable mobility Access to health, education & childcare	Water Supply Wastewater Capacity Roads/Footpath/ Cycle, Surface Water	Topography Flood Risk Built & Natural Heritage	Note; This matrix has been prepared to assist the preparation of the Local Area Plan for Athenry Local Area Plan 2023-2029. The criteria listed are not considered to be exhaustive for all LAP areas.	Justification Rationale
Tier	MAP					
T2	R1A					Connection extension required for Sewer, but footpath and public lighting present
T2	R1B					Connection extension for Sewer, but footpath and public lighting present
T1	R1C					
T1	R1D					
T1	R1E					
T1	R1F					
T1	R1G					
T1	R1H					
T1	R1I					
T1	R1J					
	R1K					Proposed Change to Transport Infrastructure-CE Recommendation
T1	R1L					
T1	R1M					
T1	R1N					



- Settlement Boundary
- Business & Enterprise
- Business & Technology
- Industrial
- Industrial - Proposed change to Open Space in CE's Report on Submissions to Draft Plan
- Open Space/Recreation & Amenity - Proposed change to Business & Technology in CE's Report on Submissions to Draft Plan
- Business & Enterprise - Proposed change to Residential (Phase 1) in CE's Report on Submissions to Draft Plan

**Draft Athery Local Area Plan
2023-2029**

**Infrastructural Assessment
Employment Lands**



STRATEGIC FLOOD RISK ASSESSMENT

ADDENDUM

AMENDED FOLLOWING PUBLIC DISPLAY OF THE DRAFT PLAN AND ASSOCIATED DOCUMENTS

TEXT TO BE ADDED IS IN RED: LIKE THIS
TEXT TO BE DELETED IS IN RED STRIKETHROUGH: ~~LIKE THIS~~

FOR THE

DRAFT ATHENRY LOCAL AREA PLAN 2023-2029

for: Galway County Council

Áras an Chontae
Prospect Hill
Galway



Comhairle Chontae na Gaillimhe
Galway County Council

by: CAAS Ltd.

1st Floor
24-26 Ormond Quay Upper
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MAY-AUGUST 2023

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Appendix I

Summary of the requirements of the Flood Guidelines for land uses in Flood Zones

Appendix II

Selection of Flood Risk Indicator Mapping and Flood Zone Mapping

Section 1 Introduction and Policy Background

1.1 Introduction

Galway County Council has prepared a new Draft Local Area Plan (LAP) for Athenry under the Planning and Development Act 2000 (as amended). The Plan sets out an overall strategy for the proper planning and sustainable development over the years 2023-2029.

This Strategic Flood Risk Assessment (SFRA) document has been prepared alongside the LAP taking into account *The Planning System and Flood Risk Management - Guidelines for Planning Authorities* (Department of the Environment, Heritage and Local Government and Office of Public Works, 2009) and Department of the Environment, Community and Local Government Circular PL 2/2014.

1.2 The Draft Local Area Plan

LAPs are required to be consistent with the policies and objectives of the County Development Plan and its Core Strategy, as well as the National Planning Framework and Regional Spatial Economic Strategies.

The LAP should be read in conjunction with the Galway County Development Plan 2022-2028, which sets out the overarching development strategy for the County. Where conflicting objectives arise between the County Development Plan and the LAP, the objectives of the relevant County Development Plan shall take precedence.

The general development management standards, zoning matrix/descriptions and policies and objectives in the County Development Plan (including provisions relating to flood risk management and drainage) can be applied to the Plan area, while additional policies and objectives that are specific to Athenry are included in the LAP.

In addition, land use zoning contained within the Draft Plan has been informed by the SFRA process and associated delineation of flood risk zones. The detailed Plan preparation process undertaken by the Planning Department combined with specialist input from the SFRA process facilitated zoning that helps to avoid inappropriate development being permitted in areas of high flood risk.

1.3 Flood Risk and its Relevance as an Issue to the Plan

1.3.1 Flood Risk

Flooding is an environmental phenomenon and can pose a risk to human health as well as causing economic and social effects. Some of the effects of flooding are identified on Table 1.

Certain lands within the Plan area have the potential to be vulnerable to flooding and this vulnerability could be exacerbated by changes in both the occurrence of severe rainfall events and associated flooding. Local conditions such as low-lying lands and slow surface water drainage can increase the risk of flooding.

Table 1 Potential effects that may occur as a result of flooding

Tangible Effects	Intangible Human and Other Effects
Damage to buildings (houses)	Loss of life
Damage to contents of buildings	Physical injury
Damage to new infrastructure e.g. roads	Increased stress
Loss of income	Physical and psychological trauma
Disruption of flow of employees to work causing knock on effects	Increase in flood related suicide
Enhanced rate of property deterioration and decay	Increase in ill health
Long term rot and damp	Homelessness
	Loss of uninsured possessions

1.4 Flood Risk Management Policy

1.4.1 EU Floods Directive

The European Directive 2007/60/EC on the assessment and management of flood risk aims to reduce and manage the risks that floods pose to human health, the environment, cultural heritage and economic activity. The Directive applies to inland waters as well as all coastal waters across the whole territory of the EU. The Directive requires Member States to:

- Carry out a preliminary assessment by 2011 in order to identify the river basins and associated coastal areas where potential significant flood risk exists (preliminary mapping was prepared and a list of Areas for Further Assessment finalised in 2012).
- Prepare flood extent maps for the identified areas (finalised in 2016 for inclusion in Flood Risk Management Plans – see below).
- Prepare flood risk management plans focused on prevention, protection and preparedness. These plans are to include measures to reduce the probability of flooding and its potential consequences. These Plans were adopted in 2018.

Implementation of the EU Floods Directive is required to be coordinated with the requirements of the EU Water Framework Directive and the current National River Basin Management Plan.

1.4.2 National Flood Policy

Historically, flood risk management focused on land drainage for the benefit of agricultural improvement. With increasing urbanisation, the Arterial Drainage Act, 1945, was amended in 1995 to permit the Office of Public Works (OPW) to implement localised flood relief schemes to provide flood protection for cities, towns and villages.

In line with changing national and international paradigms on how to manage flood risk most effectively and efficiently, a review of national flood policy was undertaken in 2003-2004. The review was undertaken by an Inter-Departmental Review Group, led by the Minister of State at the Department of Finance with special responsibility for the OPW. The Review Group prepared a report that was put to Government, and subsequently approved and published in September 2004 (Report of the Flood Policy Review Group, OPW, 2004).

The scope of the review included a review of the roles and responsibilities of the different bodies with responsibilities for managing flood risk, and to set a new policy for flood risk management in Ireland into the future. The adopted policy was accompanied by many specific recommendations, including:

- Focus on managing flood risk, rather than relying only flood protection measures aimed at reducing flooding;

- Taking a catchment-based approach to assess and manage risks within the whole-catchment context; and
- Being proactive in assessing and managing flood risks, including the preparation of flood maps and flood risk management plans.

1.4.3 National CFRAM Programme

The national Catchment Flood Risk Assessment and Management (CFRAM) programme commenced in Ireland in 2011. The CFRAM Programme is intended to deliver on core components of the National Flood Policy, adopted in 2004, and on the requirements of the EU Floods Directive. The Programme has been implemented through CFRAM studies that have been undertaken for each of the river basin districts in Ireland.

The CFRAM Programme comprises three phases as follows:

- The Preliminary Flood Risk Assessment¹ (PFRA) mapping exercise, which was completed in 2012;
- The CFRAM Studies and parallel activities, with Flood Risk Management Plans finalised in 2018; and
- Implementation and Review.

The Programme provides for three main consultative stages as follows:

- Consultation for the PFRA mapping that was adopted in 2012;
- Consultation for Flood Extent mapping, that was finalised in 2016 for inclusion in Flood Risk Management Plans; and
- Consultation for Flood Risk Management Plans, that were adopted in 2018.

The OPW is the lead agency for flood risk management in Ireland. The coordination and implementation of Government policy on the management of flood risk in Ireland is part of its responsibility. The European Communities (Assessment and Management of Flood Risks) Regulations 2010 (S.I. No. 122) identifies the Commissioners of Public Works as the 'competent authority' with overall responsibility for implementation of the Floods Directive 2007/60/EC. The OPW is the principal agency involved in the preparation of CFRAM Studies.

1.4.4 Flood Risk Management Guidelines

1.4.4.1 Introduction

In 2009, the OPW and the then Department of the Environment and Local Government (DEHLG) published Guidelines on flood risk management for planning authorities entitled *The Planning System and Flood Risk Management - Guidelines for Planning Authorities*. The Guidelines introduce mechanisms for the incorporation of flood risk identification, assessment and management into the planning process. Implementation of the Guidelines is intended to be achieved through actions at the national, regional, local authority and site-specific levels. Planning authorities and An Bord Pleanála are required to have regard to the Guidelines in carrying out their functions under the Planning Acts.

The core objectives of the Guidelines are to:

- Avoid inappropriate development in areas at risk of flooding;
- Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off;
- Ensure effective management of residual risks for development permitted in floodplains;
- Avoid unnecessary restriction of national, regional or local economic and social growth;
- Improve the understanding of flood risk among relevant stakeholders; and

¹ The PFRAs identified areas at risk of significant flooding and includes maps showing areas deemed to be at risk. The areas deemed to be most significant risk, where the flood risk that is of particular concern nationally, are identified as Areas for Further Assessment (AFAs). Tuam was identified as an AFA. The OPW has undertaken a detailed assessment on the extent and degree of fluvial flood risk for various areas in County Galway, including these AFAs, producing Flood Extent Mapping.

- Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management.

1.4.4.2 Principles of Flood Risk Management

The key principles of flood risk management set out in the flood Guidelines are to:

- Avoid development that will be at risk of flooding or that will increase the flooding risk elsewhere, where possible;
- Substitute less vulnerable uses, where avoidance is not possible; and
- Mitigate and manage the risk, where avoidance and substitution are not possible.

The Guidelines follow the principle that development should not be permitted in flood risk areas, particularly floodplains, except where there are no alternative and appropriate sites available in lower risk areas that are consistent with the objectives of proper planning and sustainable development.

Development in areas that have the highest flood risk should be avoided and/or only considered in exceptional circumstances (through a prescribed *Justification Test*) if adequate land or sites are not available in areas that have lower flood risk. Most types of development would be considered inappropriate in areas that have the highest flood risk. Only water-compatible development such as docks and marinas, dockside activities that require a waterside location, amenity open space, outdoor sports and recreation and essential transport infrastructure that cannot be located elsewhere would be considered appropriate in these areas.

1.4.4.3 Stages of SFRA

The Flood Risk Management Guidelines recommend a staged approach to flood risk assessment that covers both the likelihood of flooding and the potential consequences. The stages of appraisal and assessment are:

Stage 1 Flood risk identification – to identify whether there may be any flooding or surface water management issues related to either the area of Regional Spatial and Economic Strategies, Development Plans and LAP's or a proposed development site that may warrant further investigation at the appropriate lower level plan or planning application levels.

Stage 2 Initial flood risk assessment – to confirm sources of flooding that may affect a Plan area or proposed development site, to appraise the adequacy of existing information and to scope the extent of the risk of flooding which may involve preparing flood zone maps. Where hydraulic models exist the potential impact of a development on flooding elsewhere and of the scope of possible mitigation measures can be assessed. In addition, the requirements of the detailed assessment are scoped.

Stage 3 Detailed flood risk assessment – to assess flood risk issues in sufficient detail and to provide a quantitative appraisal of potential flood risk to a proposed or existing development or land to be zoned, of its potential impact on flood risk elsewhere and of the effectiveness of any proposed mitigation measures.

1.4.4.4 Flood Zones

Flood risk is an expression of the combination of the flood probability or likelihood and the magnitude of the potential consequences of the flood event. It is normally expressed in terms of the following relationship:

$$\text{Flood risk} = \text{Likelihood of flooding} \times \text{Consequences of flooding}$$

Likelihood of flooding is normally defined as the percentage probability of a flood of a given magnitude or severity occurring or being exceeded in any given year. For example, a 1% Annual Exceedance Probability (AEP) indicates the severity of a flood that is expected to be exceeded on average once in 100 years, i.e. it has a 1 in 100 (1%) chance of occurring in any one year.

Consequences of flooding depend on the hazards associated with the flooding (e.g. depth of water, speed of flow, rate of onset, duration, wave-action effects, water quality) and the vulnerability of people, property and the environment potentially affected by a flood (e.g. the age profile of the population, the type of development and the presence and reliability of mitigation measures).

Flood zones are geographical areas within which the likelihood of flooding is in a particular range and they are a key tool in flood risk management within the planning process as well as in flood warning and emergency planning.

There are three types of flood zones defined for the purposes of the Flood Guidelines:

- **Flood Zone A** – where the probability of flooding from rivers and the sea is highest (greater than 1% or 1 in 100 for river flooding or 0.5% or 1 in 200 for coastal flooding²);
- **Flood Zone B** – where the probability of flooding from rivers and the sea is moderate (between 0.1% or 1 in 1000 and 1% or 1 in 100 for river flooding and between 0.1% or 1 in 1000 year and 0.5% or 1 in 200 for coastal flooding); and
- **Flood Zone C** – where the probability of flooding from rivers and the sea is low (less than 0.1% or 1 in 1000 for both river and coastal flooding). Flood Zone C covers all other areas that are not in zones A or B.

A summary of the requirements of the Flood Guidelines for land uses across each of the above flood zones is provided at Appendix I.

1.5 Emerging Information and Disclaimer

It is important to note that compliance with the requirements of the Flood Risk Management Guidelines is currently based on emerging and best available data at the time of preparing the assessment, including Flood Risk Management Plans, which will be updated on a cyclical basis. The SFRA process for the Draft Plan is ongoing and will be updated as relevant, including to take account of any submissions made and any Material Alterations that arise during the Plan-preparation process.

Following adoption of the Plan, information in relation to flood risk may be altered in light of future data and analysis, by, for example, the OPW, or future flood events. As a result, all landowners and developers are advised that Galway County Council and their agents can accept no responsibility for losses or damages arising due to assessments of the vulnerability to flooding of lands, uses and developments. Owners, users and developers are advised to take all reasonable measures to assess the vulnerability to flooding of lands and buildings (including basements) in which they have an interest prior to making planning or development decisions.

Any future SFRA for the Plan area or for the County will integrate other new and emerging data.

² Coastal flooding is not relevant to the LAP

Section 2 Stage 1 SFRA - Flood Risk Identification

2.1 Introduction

Stage 1 SFRA (flood risk identification) has been undertaken in order to identify whether there may be any flooding or surface water management issues within or adjacent to zoned lands and consequently whether Stage 2 SFRA (flood risk assessment) should be proceeded to. It is reproduced in part this document.

Athenry is located within the Corrib River Basin for which the Flood Risk Management Plan for the Galway Bay South East River Basin (UOM29) has been prepared. Stage 1 SFRA is based on existing information on flood risk indicators based on historical evidence and computational models. A selection of key indicators is mapped for Athenry in Appendix II.

2.2 Drainage, Defences and Early Warning Systems

With regard to areas benefitting from drainage and defences (flood relief scheme works), there are various measures that have been implemented in County Galway that will contribute towards flood risk management. These include the culverting of various streams and rivers in many urban areas and embankments.

Arterial Drainage Schemes were carried out by the Office of Public Works under the Arterial Drainage Act 1945 to improve land for agricultural purposes and to mitigate flooding. Arterial drainage maintenance and monitoring of these schemes is still carried out by OPW on rivers, lakes, weirs, bridges and embankments to maintain adequate conveyance and ensure that flood waters (of varying magnitude but typically the 3-year flood) are retained in bank by lowering water levels during the growing season thus reducing waterlogging on the adjacent land during wetter periods. Various channels within the Athenry LAP area benefit from the Arterial Drainage Schemes (see Appendix II mapping).

The 2018 Flood Risk Management Plan (FRMP) for the Galway Bay South East River Basin (UOM29) identifies various general measures applicable to the catchment under "Measures Applicable for all Areas"³. The Plan identifies the following existing measures for the Galway Bay South East catchment in particular: Maintenance of Arterial Drainage Schemes; Maintenance of Drainage Districts; and Development of a Flood Forecasting System. For Athenry specifically, the Flood Risk Management Plan identifies that there is a relatively low level of flood risk to this community from rivers and/or the sea, and no structural flood relief measures are therefore proposed at this time. The current level of risk will be reviewed, along with all areas, on a regular basis into the future.

The provision of flood protection measures can significantly reduce flood risk. However, the Ministerial Guidelines require that the presence of flood protection structures should be ignored in determining flood zones. This is because of risks relating to failure and severe flood events that exceed design capacity (the risk of severe events is exacerbated with climate change). Notwithstanding this, new development can proceed in areas that are at elevated levels of flood risk

³ Under the headings of:

- Prevention: Sustainable Planning and Development Management
- Prevention: Sustainable Urban Drainage Systems
- Prevention: Voluntary Home Relocation
- Prevention: Adaptation Planning
- Prevention: Land Use Management and Natural Flood Risk Management Measures
- Protection: Maintenance of Channels Not Part of a Scheme
- Preparedness: Promotion of Individual and Community Resilience
- Preparedness: Flood Forecasting and Warning
- Preparedness: Emergency Response Planning
- Preparedness: Individual Property Protection
- Preparedness: Flood-Related Data Collection

subject to the Justification Test provided for by the Guidelines being passed, which takes into account proposals to manage flood risk, such as the development of defences. Although insurance can be challenging to attain in these instances.

As provided for under Plan Objective FRM 07 from the County Development Plan, it is Council policy to "Protect waterbodies and watercourses within the County from inappropriate development, including rivers, streams, associated undeveloped riparian strips, wetlands and natural floodplains. This will include protection buffers in riverine, wetland and coastal areas as appropriate". Such protection will, in combination with the direction of development within the existing footprints of settlements, safeguard flood plains from development throughout the County.

Various rivers and their banks and culverts in the area are maintained by the Office of Public Works and Galway County Council. New developments should ensure that access is preserved for the maintenance of Drainage Districts ~~and the OPW will be consulted with in the consideration of applications for developments in the vicinity of the Drainage District in this regard~~. Applications for development on land identified as benefiting land may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas.

Met Éireann currently issues flood warnings for County Galway. Met Éireann, in collaboration with the OPW, is currently engaged in the establishment of a National Flood Forecasting and Warnings Service to forecast for fluvial and coastal flood events.

2.3 Other Flood Studies

Other Flood Studies considered in the preparation of this assessment include:

- Flood Risk Management Plan (Galway Bay South East Basin), 2018;
- Previous SFRA in County Galway; and
- Regional Flood Risk Assessment for the Northern and Western Regional Spatial and Economic Strategy, 2020.

2.4 Flood Risk Indicators

Indicators of flood risk that are based on historical flooding events are identified and described on Table 2. Indicators of flood risk that are based on computational models – predictive flood risk indicators – are identified and described on Table 3. A selection of the historical and predictive flood risk indicators that were considered by the SFRA are mapped at settlement level for Athenry in Appendix II.

Table 2 Historical Flood Risk Indicators

Information Source	Description	Strategic Limitations
Recorded Flood Events from the OPW	A flood event is the occurrence of recorded flooding at a given location on a given date. The flood event is derived from different types of information (reports, photographs etc.).	This dataset only provides a spot location
Recurring Flood Events	A flood event that has occurred more than once at a certain area is named a recurring flood event.	This dataset only provides a spot location
OPW Flood Extent	A flood extent is an inundated area as recorded at a certain moment in time. This layer of information includes floods recorded in 1999/2000 and 1954.	Coverage limited
Alluvium Soils	Mineral alluvial soil mapping is indicative of recurrent or significant fluvial flooding at some point in the past and was generated by Teagasc with co-operation of the Forest Service, EPA and GSI. This project was completed May 2006.	Drainage may have changed significantly since these soils were deposited.
Benefitting lands (OPW)	Benefitting lands mapping is a dataset identifying land that might benefit from the implementation of Arterial (Major) Drainage Schemes (under the Arterial Drainage Act 1945) and indicating areas of land estimated or reported to be subject to flooding or poor drainage.	Identifies broad areas - low resolution for flood risk management

Information Source	Description	Strategic Limitations
Drainage Districts (OPW)	This drainage scheme mapping dataset was prepared on behalf of the Drainage Districts (Local Authorities with statutory responsibility for maintenance under the Arterial Drainage Act, 1925). These maps identify land that might benefit from the implementation of Arterial (Major) Drainage Schemes and indicate areas of land subject to flooding or poor drainage.	Identifies large broad areas - very low resolution for flood risk management
Land Commission (OPW)	This dataset indicates areas of land defended to some degree against flooding that were formerly the responsibility of the Land Commission.	Identifies broad areas - low resolution for flood risk management
Geological Survey of Ireland (GSI) Flood Event	Probabilistic and historic groundwater flood maps available on the GSI's Groundwater Flooding Data Viewer have been prepared by Geological Survey Ireland through the 2016-2019 GWFlooding Project. The Groundwater Flood Probability Maps show the probabilistic flood extent of groundwater flooding in limestone regions and are focused primarily (but not entirely) on flooding at seasonally flooded wetlands known as turloughs. The Historic Groundwater Flood Map shows the observed peak flood extents caused by groundwater in Ireland and are largely based on the winter 2015 / 2016 flood event which was the largest flood on record in many areas.	This 2015-2016 data shows surface water flooding and does not distinguish between fluvial and pluvial flooding. There is no GSI Flood Event mapping available within the Plan area, although it indicates areas of potential surface water risk beyond the Plan area.

Table 3 Predictive Flood Risk Indicators

Information Source	Description	Strategic Limitations
CFRAM Study, Flood Extent Mapping, 2016	Following the undertaking of the PFRA, the OPW, through its engineering consultants and working with local authorities and other stakeholders, conducted extensive engineering assessments to better understand and detail the actual risk from flooding for areas that were at highest levels of risk. This was the subject of public consultation. The outcome of that work includes Predicted Flood Extent maps that were finalised in 2016. For fluvial flood levels, calibration and verification of the models make use of the best available data including hydrometric records, photographs, videos, press articles and anecdotal information.	Spatial spread is limited, including to the areas that are considered to be at most risk of flooding.
National Indicative Fluvial Mapping (NIFM) 2021	The PFRA indicative flood maps have now been superseded by the recently published NIFM. The OPW NIFM project has produced second generation indicative fluvial flood spatial data that are of a higher quality and accuracy to those produced for the first cycle PFRA. This project has covered 27,000 km of river reaches, separated into 37 drainage areas, consisting of 509 sub-catchments.	Does not cover smaller sized catchments. There is no NIFM available within the Plan area, although it indicates areas of potential risk beyond the Plan area.
GSI Predictive groundwater flood map	The predictive groundwater flood map presents the probabilistic flood extents for locations of recurrent karst groundwater flooding. It consists of a series of stacked polygons at each site representing the flood extent for specific AEP's mapping floods that are expected to occur every 10, 100 and 1000 years (AEP of 0.1, 0.01, and 0.001 respectively). The map is focussed primarily (but not entirely) on flooding at seasonally inundated wetlands known as turloughs. Sites were chosen for inclusion in the predictive map based on existing turlough databases as well as manual interpretation of SAR imagery. The mapping process tied together the observed and SAR-derived hydrograph data, hydrological modelling, stochastic weather generation and extreme value analysis to generate predictive groundwater flood maps for over 400 qualifying sites.	Not all turloughs are included in the predictive map as some sites could not be successfully monitored with SAR and/or modelled.

Information Source	Description	Strategic Limitations
<p>OPW Preliminary Flood Risk Assessment (PFRA) Fluvial, Groundwater and Pluvial flood maps, 2012</p>	<p>The OPW PFRA mapping dataset has been arrived at by:</p> <ul style="list-style-type: none"> • Reviewing records of floods that have happened in the past; • Undertaking analysis to determine which areas might flood in the future, and what the impacts might be; and • Extensive consultation with each local authorities and other Government departments and agencies. <p>This assessment has considered all types of flooding, including that which can occur from rivers, the sea and estuaries, heavy rain, groundwater, the failure of infrastructure, and so on. It has also considered the impacts flooding can have on people, property, businesses, the environment and cultural assets. Further information on the purpose and development of the OPW PFRA Maps are available on www.floodinfoefram.ie.</p>	<p>The PFRA is only a preliminary assessment, based on available or readily derivable information. Analysis has been undertaken to identify areas prone to flooding, and the risks associated with such flooding, but this analysis is purely indicative and undertaken for the purpose of completing the PFRA. The mapping has been developed using simple and cost-effective methods and is based on broad-scale simple analysis and may not be accurate for a specific location/use.</p> <p>Pluvial flood risk is likely to be present in local areas, however; it is not taken into account in the delineation of flood zones. Furthermore, PFRA indicative pluvial maps (2012) are not considered to be reliable for the purposes of zoning or decision-making.</p>

2.5 Conclusion

The information detailed above indicates elevated levels of flood risk in various locations across the town; therefore, a Stage 2 SFRA was proceeded to.

Section 3 Stage 2 SFRA - Flood Risk Assessment

3.1 Introduction

Stage 2 SFRA (flood risk assessment) has been undertaken in order to:

- Confirm the sources of flooding that may affect zoned and adjacent areas;
- Appraise the adequacy of existing information as identified by the Stage 1 SFRA; and
- Scope the extent of the risk of flooding through the preparation of flood zone maps.

3.2 Findings and Adequacy of Existing Information and Delineation of Flood Zones

Desk and in-field studies were undertaken taking into account the following factors:

- OPW's CFRAMS fluvial flood extent mapping (2016) and other predictive indicators;
- Historical indicators of flood risk;
- Documented Council knowledge of lands;
- The potential source and direction of flood paths from rivers and streams;
- Vegetation indicative of flood risk; and
- The locations of topographic/built features that coincide with the flood indicator related boundaries/topographical survey.

Within the annual exceedance probabilities specified by the Flood Guidelines for Flood Zones A and B, there are elevated levels of flood risk at certain areas in Athenry, as shown in Appendix II.

3.3 Flood Risk Zone Mapping

Flood Risk Zone maps have been produced taking into account the findings of the Stage 1 and Stage 2 SFRA desk and in field studies as identified above⁴.

The Flood Risk Zone map for Athenry is provided in Appendix II and identifies Flood Zone A (darker blue) and Flood Zone B⁵ (lighter blue). All other areas fall within Flood Zone C. As per the Guidelines, the flood zones are as follows:

- Flood Zone A – where the probability of flooding from rivers is highest (greater than 1% or 1 in 100 for river flooding);
- Flood Zone B – where the probability of flooding from rivers is moderate (between 0.1% or 1 in 1000 and 1% or 1 in 100 for river flooding); and
- Flood Zone C – where the probability of flooding from rivers is low (less than 0.1% or 1 in 1000 for river flooding).

3.4 Sensitivity to Climate Change

'The Planning System and Flood Risk Management Guidelines for Planning Authorities and Technical Appendices, 2009' recommends that a precautionary approach to climate change is adopted due to the level of uncertainty involved in the potential effects. In this regard, the Guidelines recommends:

- Recognising that significant changes in the flood extent may result from an increase in rainfall or tide events and accordingly adopting a cautious approach to zoning land in these potential transitional areas;

⁴ Including taking into account predictive and historical indicators of flood risk, documented Council knowledge of lands, Council Engineer review and input into indicators and flood zones (local knowledge), the potential source and direction of flood paths from rivers and streams, vegetation indicative of flood risk and the locations of topographic/built features that coincide with the flood indicator related boundaries/topographical survey.

⁵ As identified by the Guidelines, in rivers with a well-defined floodplain or where the coastal plain is well defined at its rear, the limits of Zones A and B will virtually coincide. Zone B will only be significantly different in spatial extent from Zone A where there is extensive land with a gentle gradient away from the river or the sea.

- Ensuring that the levels of structures designed to protect against flooding such as flood defences⁶, land raising or raised floor levels are sufficient to cope with the effects of climate change over the lifetime of the development they are designed to protect (normally 85-100 years); and
- Ensuring that structures to protect against flooding and the development protected are capable of adaptation to the effects of climate change when there is more certainty about the effects and still time for such adaptation to be effective.

The CFRAM Programme include maps for two potential future scenarios taking account of different degrees of climate impact, the Mid-Range Future Scenario (more likely to occur over the coming decades) and the High-Range Future Scenario (less likely to occur over the coming decades). A selection of Future Scenario Mapping is provided under Appendix II of this SFRA report ([including overlays with land use zoning](#)). In compliance with the Guidelines, the Flood Zones identified by the SFRA are defined on the basis of current flood risk. The CFRAMS potential future scenarios mapping and the potential impacts of climate change, including increased rainfall intensities and increased fluvial flood flows, are required to be further taken into account at lower tiers of decision making concerning individual projects.

Flood Risk Assessments shall apply the precautionary approach recommended in the Guidelines and shall be informed by the advice on the expected impacts of climate change and the allowances to be provided for future flood risk management provided in the OPW's (2019) Flood Risk Management Climate Change Sectoral Adaptation Plan and the guidance on potential future scenarios contained therein.

3.5 Sustainable Drainage Systems and Surface Water Guidance and Strategy

As provided for by measures integrated into both the existing, already in force, Galway County Development Plan and the Draft Local Area Plan (including the measures reproduced at Section 4 of this report), new developments will be required to incorporate the requirement for Sustainable Urban Drainage Systems (SuDS) where appropriate. In combination, these provisions contribute towards a sustainable drainage strategy for the Plan area.

It is likely that some or all of the following SuDS techniques will be applicable to key development sites⁷ within Athenry, including to manage surface water run-off:

- Rainwater harvesting
- Green roofs
- Infiltration systems
- Proprietary treatment systems
- Filter strips
- Filter drains
- Swales
- Bioretention systems
- Trees
- Pervious pavements
- Attenuation storage tanks
- Detention basins
- Ponds and wetlands

Each land use zoning objective, including those for opportunity sites, allows for a range of possible uses and the Local Area Plan, and associated County Development Plan, allow for a range of scales, heights, densities configurations/layouts and designs. The application of different SuDS techniques will be dependent on a combination of the site's characteristics and the development (when known) being considered.

⁶ Defended areas are highly sensitive to climate change as the likelihood of defence failure and resulting flooding increases.

⁷ Opportunity Site 1 – Cross Street, Opportunity Site 2 – Church Street and Opportunity Site 3 – Corner of Bridge Street and Abbey Row.

Because of the infinite range of land use types and associated developments and designs that could occur on sites within the Plan area under this type of Plan⁸, the guidance from this SFRA is to consider the full range of SuDS available, taking into account the recommendations and information provided above and below. On key development/opportunity sites, in particular, integrated and area-based provision of SuDS and green infrastructure may be appropriate in order to avoid reliance on individual site by site solutions.

Some sites, such as those for which guidance is provided for below, will pose particular challenges for SuDS. The best practice manuals cited at the end of this sub-section should be considered in determining solutions at these and other development sites.

At sites with high groundwater levels:

- Infiltration techniques may be particularly challenging and shallow infiltration basins or permeable pavements, may be most appropriate.
- Storage and conveyance systems need to be kept above maximum groundwater levels and membranes of appropriate robustness should be used to line any tanks
- Locating storage tanks or lined sub-base systems below the maximum likely groundwater level can cause result in flotation and structural risks

At sites that are steeply sloping:

- Effective utilisation of SuDS storage capacity should be considered, which can benefit from aligning with contours of roads and other structures, where these sites are terraced. Terraced car-parking areas can allow for storage of water through pervious pavements. Basins on terraces can provide open space. The runoff catchment on these sites can also be divided into smaller sub catchments.
- Velocities in swales and basins due to the steep slope can be managed by using check dams in swales or in storage layers, such as below permeable pavements.
- The possibility of infiltrating water resurfacing downslope or to increase pressure on downslope structures, such as walls, causing them to fail should be considered.

At sites that are very flat:

- On very flat sites, it is often not possible to construct piped drainage systems with sufficient falls to achieve minimum self-cleansing velocities. The solution can involve the use of shallow SuDS components such as swales, pervious pavements or high-capacity linear drainage channels, often dividing the site into small sub-catchments and providing local combined storage and conveyance components.
- A slight fall on any subgrade exposed to water is preferred in order to avoid ponding of water and reduction in strength in the soil due to waterlogging. If this is not possible then reduction in strength should be taken into account in the structural design of tanks or pervious pavements.
- Pumping should be a last resort and only allowable in situations where guaranteed maintenance of the pumps can be ensured.

At sites that include areas of floodplain:

- Notwithstanding that all storage volume should normally be provided within the development footprint, outside of the floodplain, SuDS on floodplains can be effective in managing routine rainfall/treatment for frequent events.
- SuDS should be selected and designed taking account of the likely high groundwater table and vulnerability to erosion during periods of high flows/water levels and SuDS should not reduce floodplain storage or conveyance.
- Conveyance routes should limit grading and the creation of surface features that could either reduce floodplain capacity or be washed out in a flood.
- Surface discharge from SuDS should be dispersed with point discharges minimised or eliminated.

⁸ Refer to Plan "Table 1.7.1 Land Use Matrix Table", for example, for the wide range of land uses possible at sites zoned with single land use zoning objectives.

- All SuDS within or crossing a floodplain should take full consideration of the likely influence of river water levels on the design performance. Combined probability assessments may be required.
- Siltation and subsequent clearance after a flood event has subsided should also be taken into account in the design.

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. The integration of nature-based solutions, such as amenity areas, ecological corridors and attenuation ponds, into public and private development initiatives, is applicable within the provisions of the Plan and should be encouraged. Applications for development should take into account, as appropriate, the Department of Housing, Local Government and Heritage's (2022) "Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas - Water Sensitive Urban Design - Best Practice Interim Guidance Document".

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.

Urban developments, both within developments and within the public realm, should seek to minimise and limit the extent of hard surfacing and paving and require the use of sustainable drainage techniques for new development or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flood risk. Development proposals should 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.

For larger sites (i.e. multiple dwellings or commercial units) master planning should ensure that existing flow routes are maintained, through the use of green infrastructure. In addition, where multiple individual proposals are being made SUDS should be integrated where appropriate and relevant.

All proposed development, should consider the impact of surface water flood risks on drainage design e.g. in the form of a section within the flood risk assessment (for sites in Flood Zone A or B) or part of a surface water management plan.

Pluvial flood risk is likely to be present in local areas, however; it is not taken into account in the delineation of flood zones. Furthermore, PFRA indicative pluvial maps (2012) are not considered to be reliable for the purposes of zoning or decision-making. Particular attention should be given to development in low-lying areas which may act as natural ponds for collection of run-off. The drainage design should ensure no increase in flood risk to the site, or the downstream catchment. Where possible, and particularly in areas of new development, floor levels should be at an appropriate height above adjacent roads and hard standing areas to reduce the consequences of any localised flooding. Where this is not possible, an alternative design appropriate to the location may be prepared.

Further to the above, proposals for development should consider the Construction Industry Research and Information Association (CIRIA) SuDS Manual 2015 and any future update of this guidance and Greater Dublin Strategic Drainage Study documents in designing SUDS solutions, including the New Development Policy, the Final Strategy Report, the Code of Practice and "Irish SuDS: guidance on applying the GSDSDS surface water drainage criteria".

Section 4 Flood and Drainage Provisions

4.1 Introduction

In order to comply with *The Planning System and Flood Risk Management - Guidelines for Planning Authorities* (Department of the Environment, Heritage and Local Government and Office of Public Works, 2009) and Department of the Environment, Community and Local Government Circular (*PL 2/2014*) and in order to contribute towards flood risk management within the Plan area, the measures below have been integrated into the Draft Athenry Local Area Plan and the existing, already in force, Galway County Development Plan 2022-2028.

4.2 Land Use Zoning

That Flood Zones identified by the SFRA were used in line with the requirements provided for by the Flood Guidelines for land uses in Flood Zones A and B.

With respect to lands which have already been developed, the potential conflict between zonings and *highly* and *less vulnerable* development (see Tables 7 and 8 in Appendix I) were avoided by applying the constrained land use approach, with blue hatched shaded zone, 'Constrained Land Use', applied on the land use zone mapping in order to differentiate that there is a flood risk issue.

To this effect, the following provisions have been integrated into the Local Area Plan:

DM Guideline 1

Minimum Finished Floor Levels (FFL's)

In areas of limited flood depth, the specification of the threshold and floor levels of new structures shall be raised above expected flood levels to reduce the risk of flood losses to a building, by raising floor heights within the building structure using a suspended floor arrangement or raised internal concrete platforms.

When designing an extension or modification to an existing building, an appropriate flood risk reduction measure shall be specified to ensure the threshold levels into the building are above the design flood level. However, care must also be taken to ensure access for all is provided in compliance with Part M of the Building Regulations.

Where threshold levels cannot be raised to the street for streetscape, conservation or other reasons, the design shall specify a mixing of uses vertically in buildings - with less vulnerable uses located at ground floor level, along with other measures for dealing with residual flood risk.

Surface Water Drainage and Flooding

DM Standard 2: 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, soakaways 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 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).

Refer also to DM Standard 68 of the Galway County Development Plan 2022 – 2028.

**DM Standard 3: Flooding
Flood Zones and Appropriate Uses**

The table below indicates the types of land uses that are appropriate in each of the Flood Zones identified within the Plan area, in accordance with the 2009 Flood Risk Management Guidelines for Planning Authorities and Departmental Circular PL2/2014 (or any updated/superseding legislation or policy guidance).

Where developments/land uses are proposed that are inappropriate to the Flood Zone, then a Development Management Justification Test and site-specific Flood Risk Assessment will be required per The Planning System and Flood Risk Management Guidelines 2009 (and as updated).

Flood Zones	Overall probability	Planning implications for land uses		
		Highly Vulnerable Development	Less Vulnerable Development	Water Compatible Development
Flood Zone A	Highest	Inappropriate – if proposed, then Justification Test and detailed Flood Risk Assessment are required	Inappropriate – if proposed, then Justification Test and detailed Flood Risk Assessment are required	Appropriate – screen for flood risk
Flood zone B	Moderate	Inappropriate – if proposed, then Justification Test and detailed Flood Risk Assessment are required	Inappropriate due to climate change – if proposed, then Justification Test and detailed Flood Risk Assessment are required	Appropriate – screen for flood risk
Flood Zone C	Lowest	Appropriate - detailed Flood Risk Assessment may be required	Appropriate - detailed Flood Risk Assessment may be required	Appropriate – screen for flood risk

Table 3 Flood Zones Planning Implications

Refer to Flood Risk Management Guidelines 2009 and 'SFRA for the Athenry Local Area Plan 2023-2029' for additional detail:

- Highly Vulnerable Development - Houses, schools, hospitals, residential institutions, emergency services, essential infrastructure, etc.
- Less Vulnerable Development - Economic uses (retail, leisure, warehousing, commercial, industrial, non-residential institutions, etc.), land and buildings used for agriculture or forestry, local transport infrastructure, etc.
- Water Compatible Development - Docks, marinas, wharves, water-based recreation and tourism (excluding sleeping accommodation), amenity open space, sports and recreation, flood control infrastructure, etc.

Refer also to DM Standard 68 in the Galway County Development Plan 2022 – 2028.

Further to the above, following public display of the Draft Plan and associated documents, the following clarifications to the meanings of Land Use Zoning Objectives were proposed to be added to the "General Notes on Land Use Zoning Matrix" under Table 1.7.1 "Land Use Matrix" of the Plan:

6. *I T, OS, CF and C2 – See also *Flood Risk Management*, Policy Objectives below and DM Standard 68 of the GCDP 2022 - 2028.
Notwithstanding the Open Space/Recreation and Amenity zoning, this zone's proposed uses must comply with *The Planning System & Flood Risk Guidelines* (2009) (or updated). A Justification Test may be required as set out in said guidelines.
- I. Uses for lands to the west and north of Athenry Castle zoned "T Tourism" shall be limited in areas at elevated risk of flooding, as per the Flood Risk Management Guidelines, as follows;
 - a. In Flood Zone A, uses shall be limited to water compatible uses;
 - b. In Flood Zone B, uses shall be limited to less-vulnerable and water compatible uses (as per the Flood Risk Management Guidelines);
 These limitations shall take primacy over any related provision relating to the land use zoning matrix.
- II. Use for land to north of R348 zoned "CF Community Facilities" shall be limited in areas at elevated risk of flooding, as per the Flood Risk Management Guidelines, as follows:

- In Flood Zone B, uses shall be limited to less vulnerable and water compatible uses (as per the Flood Risk Management Guidelines);
These limitations shall take primacy over any related provision relating to the land use zoning matrix.

III. Uses for lands to north of R348 zoned “C2 Commercial/Mixed Uses” shall be limited in areas at elevated risk of flooding, as per the Flood Risk Management Guidelines, as follows:

- In Flood Zone A, uses shall be limited to water compatible uses;
- In Flood Zone B, uses shall be limited to less vulnerable and water compatible uses (as per the Flood Risk Management Guidelines);
These limitations shall take primacy over any related provision relating to the land use zoning matrix.

7. No specific land uses are attributed to the Constrained Land Use zone as this zone reflects existing development within Flood Zones A/B. For guidance on uses/development appropriate in this zone, please refer to Policy Objective ASP 64 below and DM Standard 68 of the GCDP 2022 – 2028, associated flood maps and *The Planning System & Flood Risk Guidelines*, including Departmental *Circular PL2/2014*.

4.3 Integration of provisions relating to flood risk management into the existing, already in force, Galway County Development Plan

Provisions relating to flood risk management, including the following, have also been integrated into the Galway County Development Plan 2022-2028:

Table 4 County Development Plan Provisions relating to Flood Risk Management

Provision
<p>Policy Objectives Flood Risk Management</p> <p>FL 1 Flood Risk Management Guidelines It is the policy objective of Galway County Council to support, in co-operation with the OPW, the implementation of the EU Flood Risk Directive (2007/60/EC), the Flood Risk Regulations (SI No. 122 of 2010) and the DEHLG/OPW publication <i>The Planning System and Flood Risk Management Guidelines (2009)</i> (and any updated/superseding legislation or policy guidance) and Department Circular PL2/2014 or any updated / superseding version.</p> <p>FL 2 Flood Risk Management and Assessment Comply with the requirements of the DoEHLG/OPW <i>The Planning System and Flood Risk Management Guidelines for Planning Authorities</i> and its accompanying Technical Appendices Document 2009 (including any updated/superseding documents). This will include the following: (a) Avoid, reduce and/or mitigate, as appropriate in accordance with the Guidelines; (b) Development proposals in areas where there is an identified or potential risk of flooding or that could give rise to a risk of flooding elsewhere will be required to carry out a Site-Specific Flood Risk Assessment, and justification test where appropriate, in accordance with the provisions of <i>The Planning System and Flood Risk Management Guidelines 2009</i> (or any superseding document); Any flood risk assessment should include an assessment of the potential impacts of climate change, such as an increase in the extent or probability of flooding, and any associated measures necessary to address these impacts; (c) Development that would be subject to an inappropriate risk of flooding or that would cause or exacerbate such a risk at other locations shall not normally be permitted; (d) Galway County Council shall work with other bodies and organisations, as appropriate, to help protect critical infrastructure, including water and wastewater, within the County, from risk of flooding.</p> <p>FL 3 Principles of the Flood Risk Management Guidelines The Planning Authority shall implement the key principles of flood risk management set out in the <i>Flood Risk Management Guidelines</i> as follows: (a) Avoid development that will be at risk of flooding or that will increase the flooding risk elsewhere, where possible; (b) Substitute less vulnerable uses, where avoidance is not possible; and (c) Mitigate and manage the risk, where avoidance and substitution are not possible. Development should only be permitted in areas at risk of flooding when there are no alternative, reasonable sites available in areas at lower risk that also meet the objectives of proper planning and sustainable development. Vulnerable development in areas which have the highest flood risk should be avoided and/or only considered in exceptional circumstances (through a prescribed Justification Test) if adequate land or sites are not available in areas which have lower flood risk</p> <p>FL 4 Flood Relief Schemes The Planning Authority shall support and co-operate with the Office of Public Works (OPW) in the delivery of Flood Relief Schemes.</p> <p>FL 5 Catchment Planning The Planning Authority will support the OPW'S CFRAM Programme and catchment-based Flood Planning Groups, especially where catchments go beyond the Council's administrative boundary, in the development and implementation of catchment-based strategies for the management of flood risk - including those relating to storage and conveyance.</p> <p>FL 6 Surface Water Drainage and Sustainable Drainage Systems (SuDs)</p>

Provision

Maintain and enhance, as appropriate, the existing surface water drainage system in the County. Ensure that new developments are adequately serviced with surface water drainage infrastructure and promote the use of Sustainable Drainage Systems in all new developments. Surface water run-off from development sites will be limited to pre-development levels and planning applications for new developments will be required to provide details of surface water drainage and sustainable drainage systems proposals.

FL 7 Protection of Waterbodies and Watercourses

Protect waterbodies and watercourses within the County from inappropriate development, including rivers, streams, associated undeveloped riparian strips, wetlands and natural floodplains. This will include protection buffers in riverine, wetland and coastal areas as appropriate.

FL 8 Flood Risk Assessment for Planning Applications and CFRAMS

"Protect Flood Zone A and Flood Zone B from inappropriate development and direct developments/land uses into the appropriate Flood Zone in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 (or any superseding document) and the guidance contained in Development Management Standard 69.

Site-specific Flood Risk Assessment (FRA) is required for all planning applications in areas at elevated risk of flooding, even for developments appropriate to the particular flood zone. The detail of these site-specific FRAs will depend on the level of risk and scale of development. A detailed site-specific FRA should quantify the risks, the effects of selected mitigation and the management of any residual risks. The Planning Authority shall have regard to the results of any CFRAM Studies in the assessment of planning applications.

Development proposal will need to be accompanied by a Development Management Justification Test in addition to the site-specific Flood Risk Assessment.

Where only a small proportion of a site is at risk of flooding, the sequential approach shall be applied in site planning, in order to seek to ensure that no encroachment onto or loss of the flood plain occurs and/or that only water compatible development such as Open Space would be permitted for the lands which are identified as being at risk of flooding within that site.

In Flood Zone C, where the probability of flooding is low (less than 0.1%, Flood Zone C), site-specific Flood Risk Assessment may be required and the developer should satisfy themselves that the probability of flooding is appropriate to the development being proposed.

In addition to the County Plan SFRA datasets (including the Flood Zones, CFRAMS mapping, historical and predictive groundwater mapping, predictive pluvial mapping and historical flood risk indicator mapping, such as the Benefitting Lands mapping), new and emerging datasets (such as the OPW's National Fluvial Mapping that will supersede existing PFRA fluvial mapping for catchments greater than 5km²) must be consulted by prospective applicants for developments and will be made available to lower-tier Development Management processed in the Council. Applications for developments in coastal areas and associated assessments shall also consider wave overtopping and coastal erosion.

FL 9 SFRA of Lower Tier Plans

Lower tier plans shall undertake SFRA (Strategic Flood Risk Assessment) in compliance with the Flood Risk Management Guidelines.

FL 10 SFRA/FRA and Climate Change

SFRAs and site-specific FRAs shall provide information on the implications of climate change with regard to flood risk in relevant locations. The 2009 OPW Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management (or any superseding document) shall be consulted with to this effect.

FL 11 FRA and Environmental Impact Assessment (EIA)

Flood risk may constitute a significant environmental effect of a development proposal that in certain circumstances may trigger a sub-threshold EIA. FRA should therefore be an integral part of any EIA undertaken for projects within the County.

FL 12 Inland Fisheries

It is a policy objective of the Planning Authority to consult, where necessary, with Inland Fisheries Ireland, the National Parks and Wildlife Service and other relevant agencies in the construction of flood alleviation measures in County Galway.

FL 13 CFRAM

It is a policy objective of the Planning Authority to take account of and incorporate into local planning policy and decision making, including possible future variations to this plan, CFRAM measures that may be published in the future, including planned investment measures for managing and reducing flood risk.

FL 14 Flood Vulnerable Zones

It is a policy objective of the Planning Authority to ensure that applications pertaining to existing developments in flood vulnerable zones provide details of structural and non-structural risk management measures to include, but not be limited to specifications of the following - floor levels, internal layout, flood resilient construction, flood resistant construction, emergency response planning, access and egress during flood events.

FL 15 Flood Risk Management

Ensure each flood risk management activity is examined to determine actions required to embed and provide for effective climate change adaptation as set out in the OPW Climate Change Sectoral Adaptation Plan for Flood Risk Management applicable at the time.

FL 16 Benefitting Land

Applications for development on land identified as benefitting land may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas.

FL 17 Consultation with OPW

Consult with the OPW in relation to proposed developments in the vicinity of drainage channels and rivers for which the OPW are responsible and retain a strip on either side of such channels where required, to facilitate maintenance access thereto. In addition, promote the sustainable management and uses of water bodies and avoid culverting or realignment of these features.

FL 18 Inappropriate Development on Flood Zones

Where a development/land use is proposed within any area subject to this objective the development proposal will need to be accompanied by a detailed hydrological assessment and robust SUDS design which demonstrates the capacity to withstand potential flood events to maintain water quality and avoid potential effects to ecological features.

- Any development proposals should be considered with caution and will be required to comply with The Planning System and Flood Risk Management Guidelines for Planning Authorities/Circular PL2/2014 & the associated Development Management Justification Test.
- Climate Change should be duly considered in any development proposal.
- Protect the riparian zones of watercourse systems throughout the plan area through a general 10 metre protection buffer from rivers within the plan area as measured from the near riverbank, (this distance may be increased and decreased on a site by site basis, as appropriate).
- Any development proposals submitted for this site will require a detailed ecological report (s), carried out by suitably qualified personnel for the purposes of informing Appropriate Assessment Screening by Galway County Council, the competent authority.
- The relevant lands will be outlined and flagged with a symbol on the land use zoning map and on the GIS system of Galway County Council so that staff and the public are aware of the special conditions/constraints attached.
- A briefing will be provided to relevant staff within Galway County Council on the special conditions and constraints on relevant lands.

4.4 Integration of other provisions relating to flood risk management into the Draft Local Area Plan

Further to the measures relating to land use zoning integrated into the LAP (see Section 4.2 above) and those already in force through the Galway County Development Plan 2022-2028 (see Section 4.3 above), a number of other measures relating to flood risk and drainage have been integrated into the Draft Local Area plan as detailed on Table 5 below. In combination, these provisions contribute towards a sustainable drainage strategy for the Plan area (see also Section 3.5 of this document).

Table 5 Draft Local Area Plan Provisions relating to Flood Risk Management

Provision
<p>ASP 3 Environmental Assessment To require the preparation and assessment of all planning applications in the plan area to have regard to the information, data and requirements of the Appropriate Assessment Natura Impact Report, SEA Environmental Report and Strategic Flood Risk Assessment Report that accompany this LAP.</p> <p>ASP 23 Open Space, Recreation and Amenity Promote the sustainable management, use and/or development, as appropriate, of open space/recreation and amenity lands. This will include:</p> <ul style="list-style-type: none"> a) Development of open spaces and recreational activities, in accordance with best practice and on suitable lands with adequate access to the local community; b) Existing open space, sports and recreational facilities should be retained unless it can be demonstrated to the satisfaction of Galway County Council that these uses are surplus to requirements of the local community or are to be replaced by an equivalent or better provision; c) Appropriate management and use of any flood risk areas within the OS zone to avoid, reduce and/or mitigate, as appropriate, the risk and potential impact of flooding; d) Appropriate management and use of any areas of high biodiversity value; e) Tourism; f) Encourage and assist the development of the tourist potential within Athenry in a manner that protects the architectural, archaeological and cultural significance of the town and its environs in a sustainable manner. <p>ASP 34 Green Network and the Landscape Support the development of a network of amenities, open spaces and natural areas that support biodiversity, that incorporate existing landscape features such as local rivers, streams, trees, stone walls and hedgerows, that provide pedestrian and cycling linkages and active and passive recreation opportunities, that help to structure and provide relief from the built environment and that can provide areas for surface water attenuation and flood risk management.</p> <p>ASP 60 Climate Change and Local Renewable Energy Sources Promote and encourage development which is resilient to climate change by ensuring that development proposals demonstrate sustainable design principles for new buildings/ services/site including:</p> <ul style="list-style-type: none"> a) Measures such as green roofs and green walls to reduce internal overheating and the urban heat island effect; b) Ensuring the efficient use of natural resources (including water) and making the most of natural systems both within and around buildings; c) Minimising pollution by reducing surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems (SuDS); d) Reducing flood risk, damage to property from extreme events—residential, public and commercial; e) Reducing risks from temperature extremes and extreme weather events to critical infrastructure such as roads, communication networks, the water/drainage network, and energy supply; f) Promoting and protecting biodiversity and green infrastructure. <p>ASP 64 Constrained Land Use To facilitate the appropriate management and sustainable use of Flood Risk within the zoning plan area. This zoning indicates where the Plan Making Justification Test may need to be applied and as such can limit new development, while recognising that existing development uses within these zones may require small scale development, as outlined below, over the life of the Local Area Plan, which would contribute towards the compact and sustainable urban development of the town. New development will generally be limited to water-compatible uses in Flood Zone A, and less vulnerable or water compatible uses in Flood Zone B, and a detailed site-specific Flood Risk Assessment will be required in these areas. The underlying zoning or the existing permitted uses may be deemed to be acceptable in principle, however within Flood Zone A/B development is typically limited to extensions, renovations and change of use. Infill highly vulnerable development and demolition and reconstruction can only take place in Flood Zone C. Less vulnerable development in Flood Zone B will also need to be considered carefully. These aspects are assessed on a case by case basis under the application of the Plan Making Justification Test and as supported by specific objectives in the written statement. Where the Justification Test is passed there is also a requirement for a detailed Flood Risk Assessment at Development Management stage. The FRA should be carried out in accordance with The Planning System and Flood Risk</p> <p>ASP 65 Flood Risk Management Guidelines It is the policy objective of Galway County Council to support, in cooperation with the OPW, the implementation of the EU Flood Risk Directive (2007/60/EC), the Flood Risk Regulations (SI No. 122 of 2010) and the DEHLG/OPW publication The Planning System and Flood Risk Management Guidelines (2009) (and any updated/superseding legislation or policy guidance) and Department Circular PL2/2014 or any updated / superseding version.</p> <p>ASP 66 Flood Risk Management and Assessment It is a Policy Objective of the Council to comply with the requirements of the DoEHLG/OPW The Planning System and Flood Risk Management Guidelines for Planning Authorities and its accompanying Technical Appendices Document 2009 (including any updated/superseding documents). This will include the following:</p> <ul style="list-style-type: none"> a) Avoid, reduce and/or mitigate, as appropriate in accordance with the Guidelines; b) Development proposals in areas where there is an identified or potential risk of flooding or that could give rise to a risk of flooding elsewhere will be required to carry out a Site-Specific Flood Risk Assessment, and justification test where appropriate, in accordance with the provisions of The Planning System and Flood Risk Management Guidelines 2009 (or any superseding document); Any flood risk assessment should include an assessment of the potential impacts of climate change, such as an increase in the extent or probability of

Provision

flooding, and any associated measures necessary to address these impacts;

c) Development that would be subject to an inappropriate risk of flooding or that would cause or exacerbate such a risk at other locations shall not normally be permitted;

d) Galway County Council shall work with other bodies and organisations, as appropriate, to help protect critical infrastructure, including water and wastewater, within the County, from the risk of flooding.

ASP 67 Principles of Flood Risk Management Guidelines

The Council shall implement the key principles of flood risk management set out in the Flood Risk Management Guidelines as follows:

a) Avoid development that will be at risk of flooding or that will increase the flooding risk elsewhere, where possible;

b) Substitute less vulnerable uses, where avoidance is not possible; and,

c) Mitigate and manage the risk, where avoidance and substitution are not possible.

Development should only be permitted in areas at risk of flooding when there are no alternative reasonable sites available in areas at lower risk that also meet the objectives of proper planning and sustainable development. Vulnerable development in areas which have the highest flood risk should be avoided and/or only considered in exceptional circumstances (through a prescribed Justification Test) if adequate land or sites are not available in areas which have a lower flood risk.

ASP 69 Surface Water Drainage and Sustainable Drainage Systems (SuDs)

Maintain and enhance, as appropriate, the existing surface water drainage system in Athenry. Ensure that new developments are adequately serviced with surface water drainage infrastructure and promote the use of Sustainable Drainage Systems in all new developments. Surface water runoff from development sites will be limited to pre-development levels and planning applications for new developments will be required to provide details of surface water drainage and Sustainable Drainage Systems proposals. To maximise the capacity of existing collection systems for foul water, the discharge of additional surface water to combined (foul and surface water) sewers is not permitted. Refer also to Section 3.5 of the accompanying SFRA, "Sustainable Urban Drainage Systems and Surface Water Guidance and Strategy"

ASP 70 Protection of Waterbodies and Watercourses

Protect waterbodies and watercourses within the County from inappropriate development, including rivers, streams, associated undeveloped riparian strips, wetlands and natural floodplains. This will include protection buffers in the riverine, wetland and coastal areas as appropriate. To contribute towards the protection and improvement of the status of surface and ground waters in accordance with the Water Framework Directive.

Applications for development under the Plan must demonstrate that the development proposal would not adversely affect a water body's ability to meet its objectives under the Water Framework Directive, individually as a result of the proposed development or cumulatively, in combination with other developments.

ASP 72 Flood Risk Assessment for Planning Applications and CFRAMS

Protect Flood Zone A and Flood Zone B from inappropriate development and direct developments/land uses into the appropriate Flood Zone in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 (or any superseding document) and the guidance contained in Development Management Standards 2 and 3. Site-specific Flood Risk Assessment (FRA) is required for all planning applications in areas at elevated risk of flooding, even for developments appropriate to the particular flood zone. The detail of these site-specific FRAs will depend on the level of risk and scale of development. A detailed site specific FRA should quantify the risks, the effects of selected mitigation and the management of any residual risks. The Council shall have regard to the results of any CFRAM Studies in the assessment of planning applications. Where a development/land use is proposed that is inappropriate within the Flood Zone, then the development proposal will need to be accompanied by a Development Management Justification Test in addition to the site-specific Flood Risk Assessment. In Flood Zone C, where the probability of flooding is low (less than 0.1%, Flood Zone C), site-specific Flood Risk Assessment may be required, and the developer should satisfy themselves that the probability of flooding is appropriate to the development being proposed.

ASP 73 Flood Risk Assessment and Climate Change

Flood Risk Assessment in Athenry shall provide information on the implications of climate change with regard to flood risk in relevant locations. The [Flood Risk Management – Climate Change Sectoral Adaptation Plan 2019_2009-OPW-Draft-Guidance-on-Assessment-of-Potential-Future-Scenarios-for-Flood-Risk-Management-\(or-any-superseding-document\)](#) shall be consulted with to this effect.

ASP 74 Western River Basin District Management Plan and Protection of Waters

Support the implementation of the relevant recommendations and measures as outlined in the Western River Basin Management Plan 2009-2015 or any other plan that may supersede same during the lifetime of this Local Area Plan. The development shall only be permitted where it can be clearly demonstrated that the proposal would not have an unacceptable impact on the water environment, including surface water, groundwater quality and quantity, river corridors and associated wetlands.

Galway County Council is statutorily obliged to prevent any further deterioration in the quality status of the waters in Athenry (Clarín River and the Clare River Drainage Area) and to ensure good quality status by 2021.

ASP 75 Flood Risk Assessment and Environmental Impact Assessment (EIA)

Flood risk may constitute a significant environmental effect of a development proposal that in certain circumstances may trigger a sub-threshold EIA. FRA should therefore be an integral part of any EIA undertaken for projects within Athenry.

ASP 76 Flood Vulnerable Zones

It is a policy objective of the Council to ensure that applications pertaining to existing developments in flood vulnerable zones provide details of structural and non-structural risk management measures to include, but not be limited to specifications of the following – floor levels, internal layout, flood resilient construction, flood resistant construction, emergency response planning, access and egress during flood events.

ASP 77 Flood Risk Management

Ensure each flood risk management activity is examined to determine actions required to embed and provide for effective climate change adaptation as set out in the OPW Climate Change Sectoral Adaptation Plan for Flood Risk Management applicable at the time.

DM Guideline 1 Minimum Finished Floor Levels (FFL's)

DM Standard 2: Sustainable Drainage Systems (SuDS): Nature based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Best Practice Interim Guidance Document.

DM Standard 3: Flooding - Flood Zones and Appropriate Uses

4.5 Justification Test

The levels of flood risk identified by the SFRA were a key informant of land uses in undeveloped areas in Flood Zones A and B. The Justification Test (including its various criteria – see **Appendix I**) is required to be passed for uses that would be otherwise considered inappropriate.

Only appropriate land uses are being proposed for previously undeveloped lands within Flood Zones A and B.

Potential conflict between zonings and *highly* and *less vulnerable* development will be avoided by applying the measures which have been integrated into the Plan, including those detailed above under Section 4 of this report.

Although Stage 3 detailed flood risk assessment has not been required for the Plan-preparation process, it may be required for individual projects following adoption of the Plan.

Table 6 Justification Tests

Site and Zoning in Draft Plan Note that the meaning of zoning objectives has been influenced by the SFRA process and these meanings are explained in the Draft Plan	Justification Test (Fails, if one of the following fails; All must be passed for the test to be passed)			
	Is the settlement targeted for growth under the RSES, existing CDP and/or Draft CDP?	Is the zoning of the lands required to achieve the proper planning and sustainable development of the settlement? All sub-criteria ⁹ must be satisfied	SFRA recommendation integrated into the Plan for management of risk?	Overall Result
(Previously developed) T Tourism at Caheroyn House	Yes	This land use zoning proposal fulfils all sub-criteria and would contribute towards overall sustainable, compact and balanced regional development by inclusion as part of the Development Plan - as confirmed by the Planning Department.	Yes, see provisions repeated in Section 4 of this report	Pass
(Previously developed) R Residential Existing to the east of Caheroyn Road	Yes	This land use zoning proposal fulfils all sub-criteria and would contribute towards overall sustainable, compact and balanced regional development by inclusion as part of the Development Plan - as confirmed by the Planning Department.	Yes, see provisions repeated in Section 4 of this report	Pass
(Previously developed) C1 Town Centre to the west of Clarin River	Yes	This land use zoning proposal fulfils all sub-criteria and would contribute towards overall sustainable, compact and balanced regional development by inclusion as part of the Development Plan - as confirmed by the Planning Department.	Yes, see provisions repeated in Section 4 of this report	Pass
(Previously developed) CF Community Facilities to the east of Clarin River	Yes	This land use zoning proposal fulfils all sub-criteria and would contribute towards overall sustainable, compact and balanced regional development by inclusion as part of the Development Plan - as confirmed by the Planning Department.	Yes, see provisions repeated in Section 4 of this report	Pass
(Previously developed) PU Public Utilities to north of R348	Yes	This land use zoning proposal fulfils all sub-criteria and would contribute towards overall sustainable, compact and balanced regional development by inclusion as part of the Development Plan - as confirmed by the Planning Department.	Yes, see provisions repeated in Section 4 of this report	Pass
<u>Lands to the west and north of Athenry Castle zoned "T Tourism"</u>	<u>Yes</u>	<u>No</u>	<u>Yes, see provisions repeated in Section 4 of this report including Footnote No. 6 from the Draft Plan's "Land Use Matrix" (Table 1.7.1 of the Plan)</u>	<u>FAIL</u>
<u>Lands to north of R348 zoned "CF Community Facilities"</u>	<u>Yes</u>	<u>No</u>	<u>Yes, see provisions repeated in Section 4 of this report including Footnote No. 6 from the Draft Plan's "Land Use Matrix" (Table 1.7.1 of the Plan)</u>	<u>FAIL</u>
<u>Lands to north of R348 zoned "C2 Commercial/Mixed Uses"</u>	<u>Yes</u>	<u>No</u>	<u>Yes, see provisions repeated in Section 4 of this report including Footnote No. 6 from the Draft Plan's "Land Use Matrix" (Table 1.7.1 of the Plan)</u>	<u>FAIL</u>

⁹ (i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;

(ii) Comprises significant previously developed and/or under-utilised lands;

(iii) Is within or adjoining the core of an established or designated urban settlement;

(iv) Will be essential in achieving compact and sustainable urban growth; and

(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.

Section 5 Conclusion

Galway County Council has prepared a new Draft Local Area Plan (LAP) for Athenry under the Planning and Development Act 2000 (as amended). The Plan sets out an overall strategy for the proper planning and sustainable development over the years 2023-2029.

The LAP should be read in conjunction with the Galway County Development Plan 2022-2028, which sets out the overarching development strategy for the County. Where conflicting objectives arise between the County Development Plan and the LAP, the objectives of the relevant County Development Plan shall take precedence.

The general development management standards, zoning matrix/descriptions and policies and objectives in the County Development Plan (including provisions relating to flood risk management and drainage) can be applied to the Plan area, while additional policies and objectives that are specific to Athenry are included in the LAP.

In addition, land use zoning contained within the Draft Plan has been informed by the SFRA process and associated delineation of flood risk zones. The detailed Plan preparation process undertaken by the Planning Department combined with specialist input from the SFRA process facilitated zoning that helps to avoid inappropriate development being permitted in areas of high flood risk.

Appendix I: Summary of the requirements of the Flood Guidelines for land uses in Flood Zones

Requirements relating to land uses in Flood Zones as set out in the Department of Environment, Heritage and Local Government (DEHLG) and Office of Public Works (OPW) 2009 Flood Guidelines (including at Chapter 3 Principles and Key Mechanisms and Chapter 5 Flooding and Development Management) and Departmental Circular PL2/2014 should be adhered to.

- The Sequential Approach, including the Justification test -

The key principles of the Guidelines' risk-based sequential approach (see Figure 1) are:

- Avoid development in areas at risk of flooding. If this is not possible, consider substituting a land use that is less vulnerable to flooding. Only when both avoidance and substitution cannot take place should consideration be given to mitigation and management of risks.
- Inappropriate types of development that would create unacceptable risks from flooding should not be planned for or permitted.
- Exceptions to the restriction of development due to potential flood risks are provided for through the use of a Justification Test, where the planning need and the sustainable management of flood risk to an acceptable level must be demonstrated.

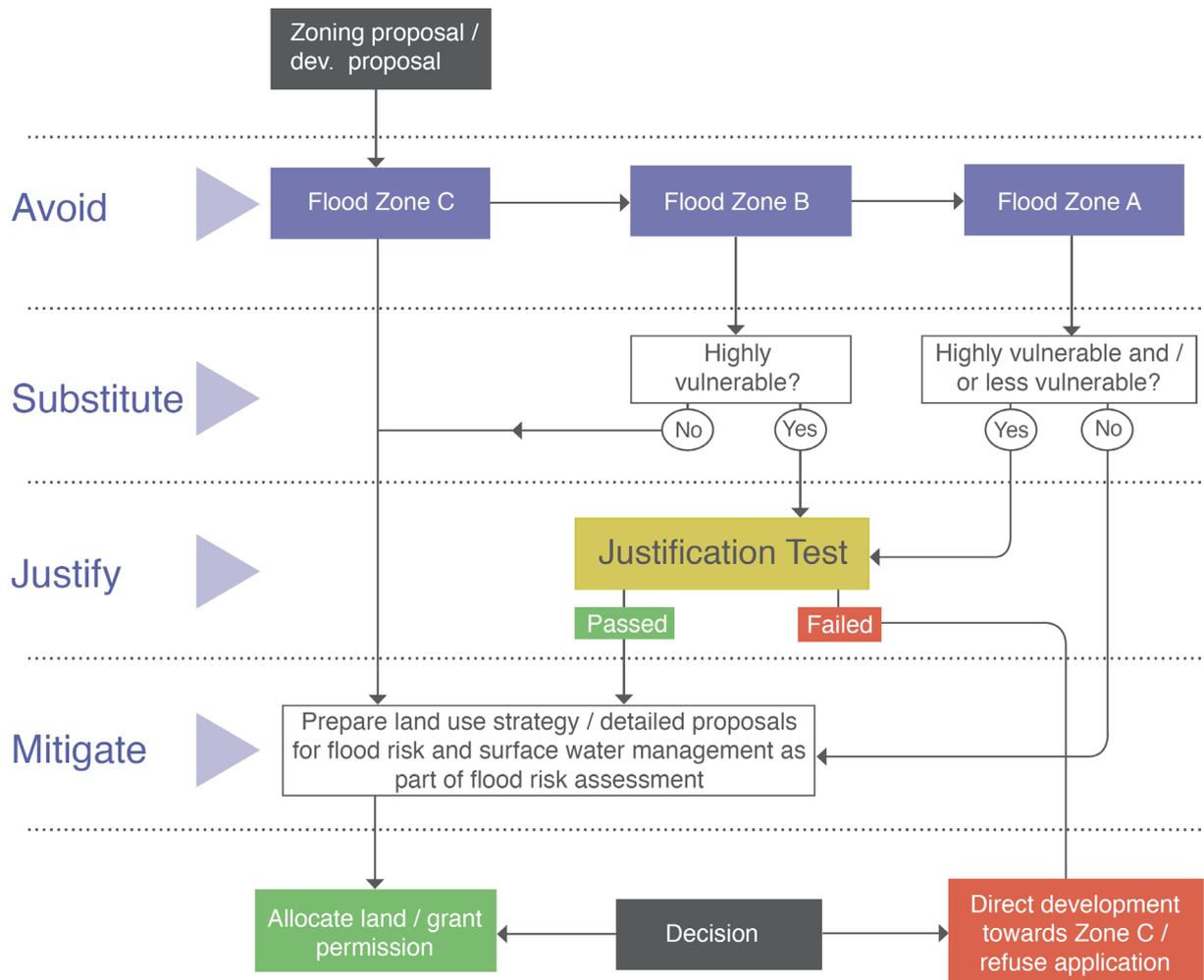


Figure 1 Sequential Approach Process¹⁰

In summary, the **planning implications** for each of the flood zones are:

Zone A - High probability of flooding. Most types of development would be considered inappropriate in this zone. Development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere, and where the Justification Test has been applied. Only water-compatible development, such as docks and marinas, dockside activities that require a waterside location, amenity open space, outdoor sports and recreation, would be considered appropriate in this zone.

Zone B - Moderate probability of flooding. Highly vulnerable development, such as hospitals, residential care homes, Garda, fire and ambulance stations, dwelling houses and primary strategic transport and utilities infrastructure, would generally be considered inappropriate in this zone, unless the requirements of the Justification Test can be met. Less vulnerable development, such as retail, commercial and industrial uses, sites used for short-let for caravans and camping and secondary strategic transport and utilities infrastructure, and water-compatible development might be considered appropriate in this zone. In general however, less vulnerable development should only be considered in this zone if adequate lands or sites are not available in Zone C and subject to a flood risk assessment to the appropriate level of detail to demonstrate that flood risk to and from the development can or will adequately be managed.

Zone C - Low probability of flooding. Development in this zone is appropriate from a flood risk perspective (subject to assessment of flood hazard from sources other than rivers and the coast) but

¹⁰ Flood Zone C covers all areas outside of Zones A and B

would need to meet the normal range of other proper planning and sustainable development considerations.

Table 7 overleaf classifies the vulnerability of different types of development while Table 7 identifies the appropriateness of development belonging to each vulnerability class within each of the flood zones as well as identifying what instances in which the Justification Test should be undertaken. Inappropriate development that does not meet the criteria of the Justification Test should not be considered at the plan-making stage or approved within the development management process.

Table 7 Classification of vulnerability of different types of development

Vulnerability class	Land uses and types of development which include*:
Highly vulnerable development (including essential infrastructure)	<p>Garda, ambulance and fire stations and command centres required to be operational during flooding;</p> <p>Hospitals;</p> <p>Emergency access and egress points;</p> <p>Schools;</p> <p>Dwelling houses, student halls of residence and hostels;</p> <p>Residential institutions such as residential care homes, children's homes and social services homes;</p> <p>Caravans and mobile home parks;</p> <p>Dwelling houses designed, constructed or adapted for the elderly or, other people with impaired mobility; and</p> <p>Essential infrastructure, such as primary transport and utilities distribution, including electricity generating power stations and sub-stations, water and sewage treatment, and potential significant sources of pollution (SEVESO sites, IPPC sites, etc.) in the event of flooding.</p>
Less vulnerable development	<p>Buildings used for: retail, leisure, warehousing, commercial, industrial and non-residential institutions;</p> <p>Land and buildings used for holiday or short-let caravans and camping, subject to specific warning and evacuation plans;</p> <p>Land and buildings used for agriculture and forestry;</p> <p>Waste treatment (except landfill and hazardous waste);</p> <p>Mineral working and processing; and</p> <p>Local transport infrastructure.</p>
Water-compatible development	<p>Flood control infrastructure;</p> <p>Docks, marinas and wharves;</p> <p>Navigation facilities;</p> <p>Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location;</p> <p>Water-based recreation and tourism (excluding sleeping accommodation);</p> <p>Lifeguard and coastguard stations;</p> <p>Amenity open space, outdoor sports and recreation and essential facilities such as changing rooms; and</p> <p>Essential ancillary sleeping or residential accommodation for staff required by uses in this category (subject to a specific warning and evacuation plan).</p>
*Uses not listed here should be considered on their own merits	

Table 8 Vulnerability Classes and Flood Zones

	Flood Zone A	Flood Zone B	Flood Zone C
Highly vulnerable development (including essential infrastructure)	Justification Test	Justification Test	Appropriate
Less vulnerable development	Justification Test	Appropriate	Appropriate
Water-compatible development	Appropriate	Appropriate	Appropriate

The **Justification Test** which is referred to as part of the Sequential Approach is an assessment of whether a development proposal within an area at risk of flooding meets specific criteria for proper planning and sustainable development and demonstrates that it will not be subject to unacceptable risk nor increase flood risk elsewhere. The Justification Test should be applied only where development is within flood risk areas that would be defined as inappropriate under the screening test of the sequential risk based approach outlined above. This Justification Test is shown below.

Where, as part of the preparation and adoption or variation and amendment of a development/local area plan¹, a planning authority is considering the future development of areas in an urban settlement that are at moderate or high risk of flooding, for uses or development vulnerable to flooding that would generally be inappropriate as set out in Table 3.2, all of the following criteria must be satisfied:

- 1 The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.
- 2 The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:
 - (i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement²;
 - (ii) Comprises significant previously developed and/or under-utilised lands;
 - (iii) Is within or adjoining the core³ of an established or designated urban settlement;
 - (iv) Will be essential in achieving compact and sustainable urban growth; and
 - (v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement⁴
- 3 A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.

N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment.

Figure 2 Justification Test ¹¹

¹¹ Footnotes: ¹ Including Strategic Development Zones and Section 25 Schemes in the area of the Dublin Docklands Development Authority ²In the case of Gateway planning authorities, where a number of strategic growth centres have been identified within the overall area of the authority, the Justification Test may be applied for vulnerable development within each centre. ³ See definition of the core of an urban settlement in Glossary of Terms. ⁴ This criterion may be set aside where section 4.27b applies.

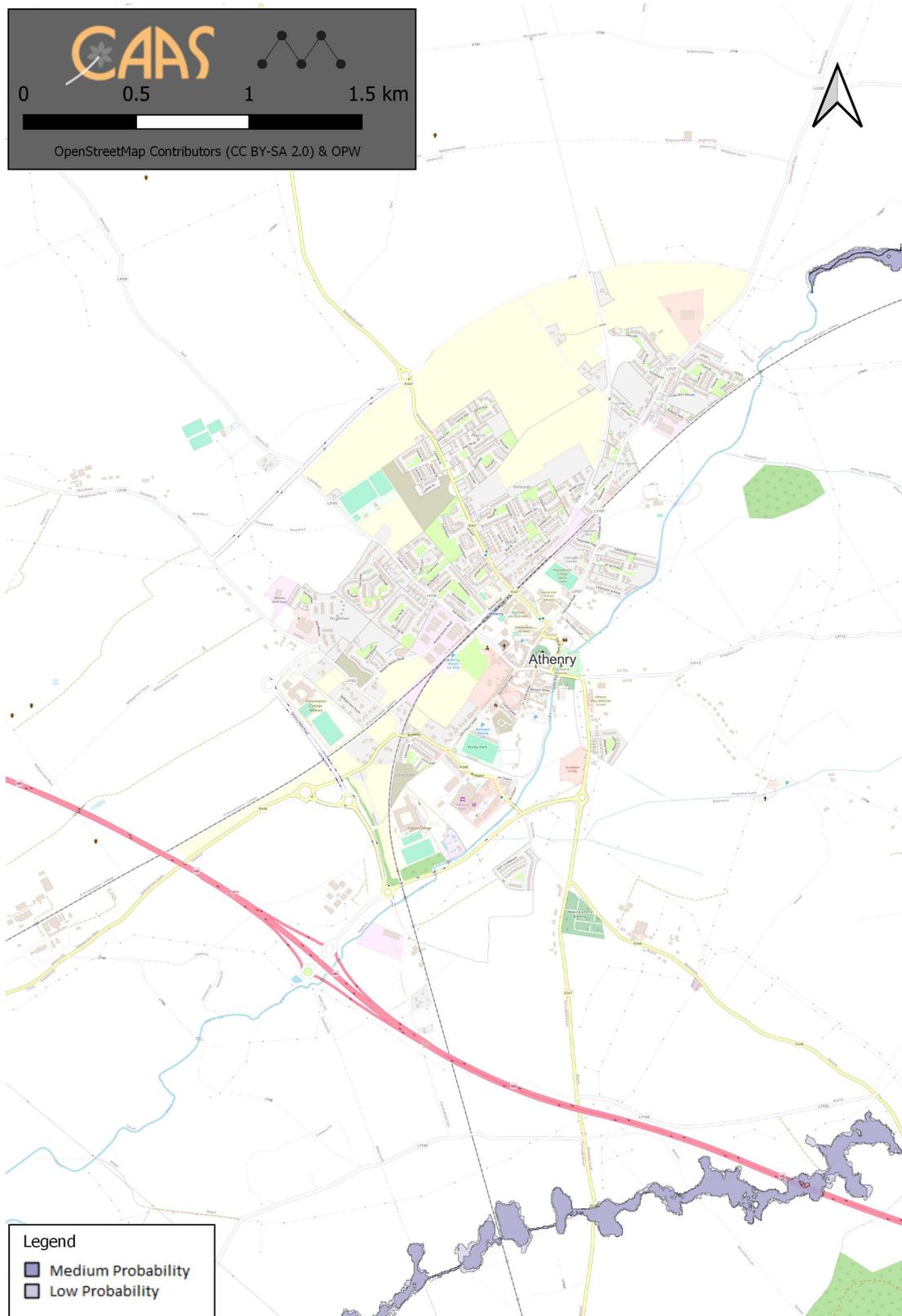
Appendix II: Selection of Flood Risk Indicator Mapping and Flood Zone Mapping



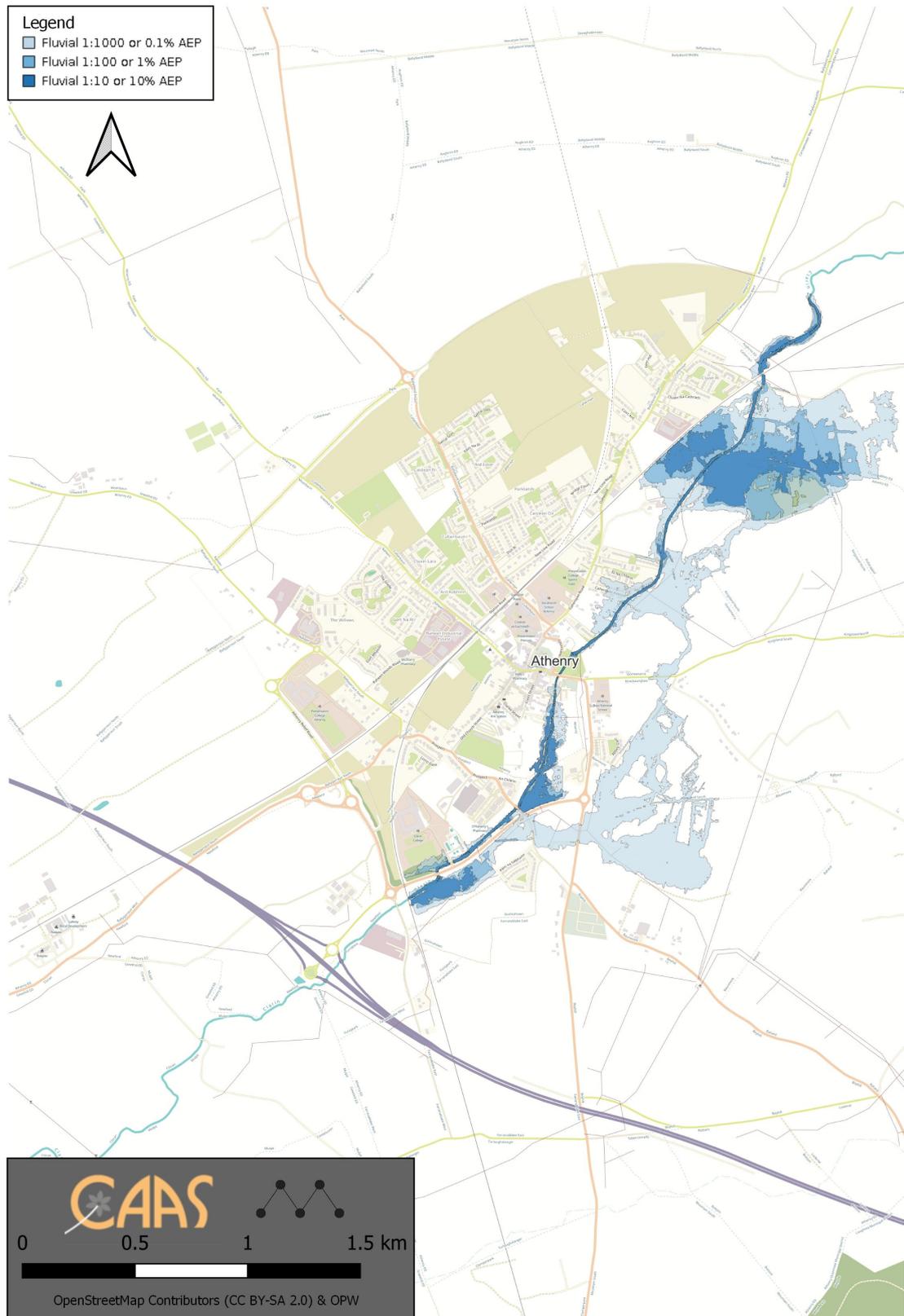
Selection of Indicators – NIFM Present Day



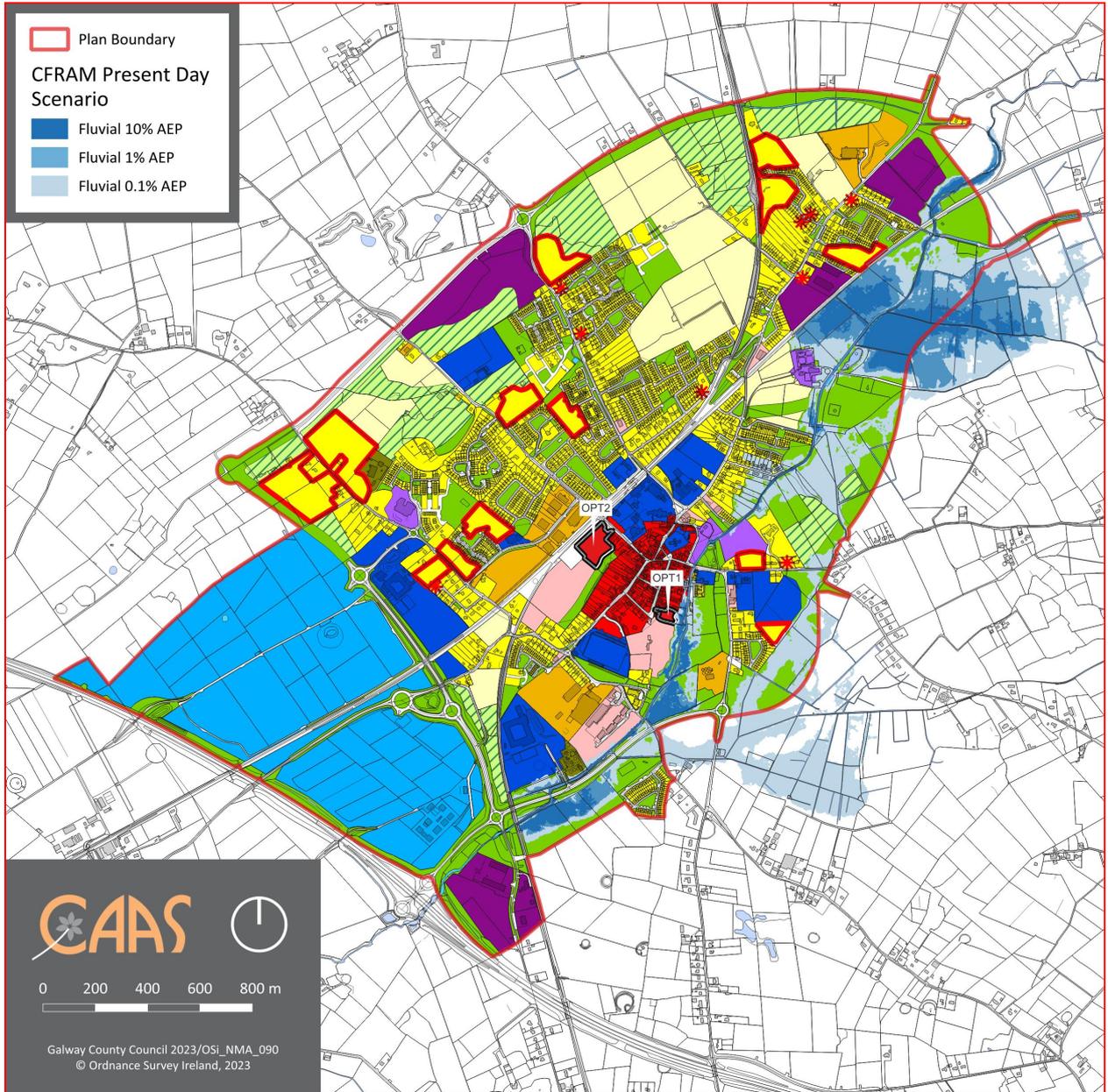
Selection of Indicators – NIFM Mid-Range Future Scenario



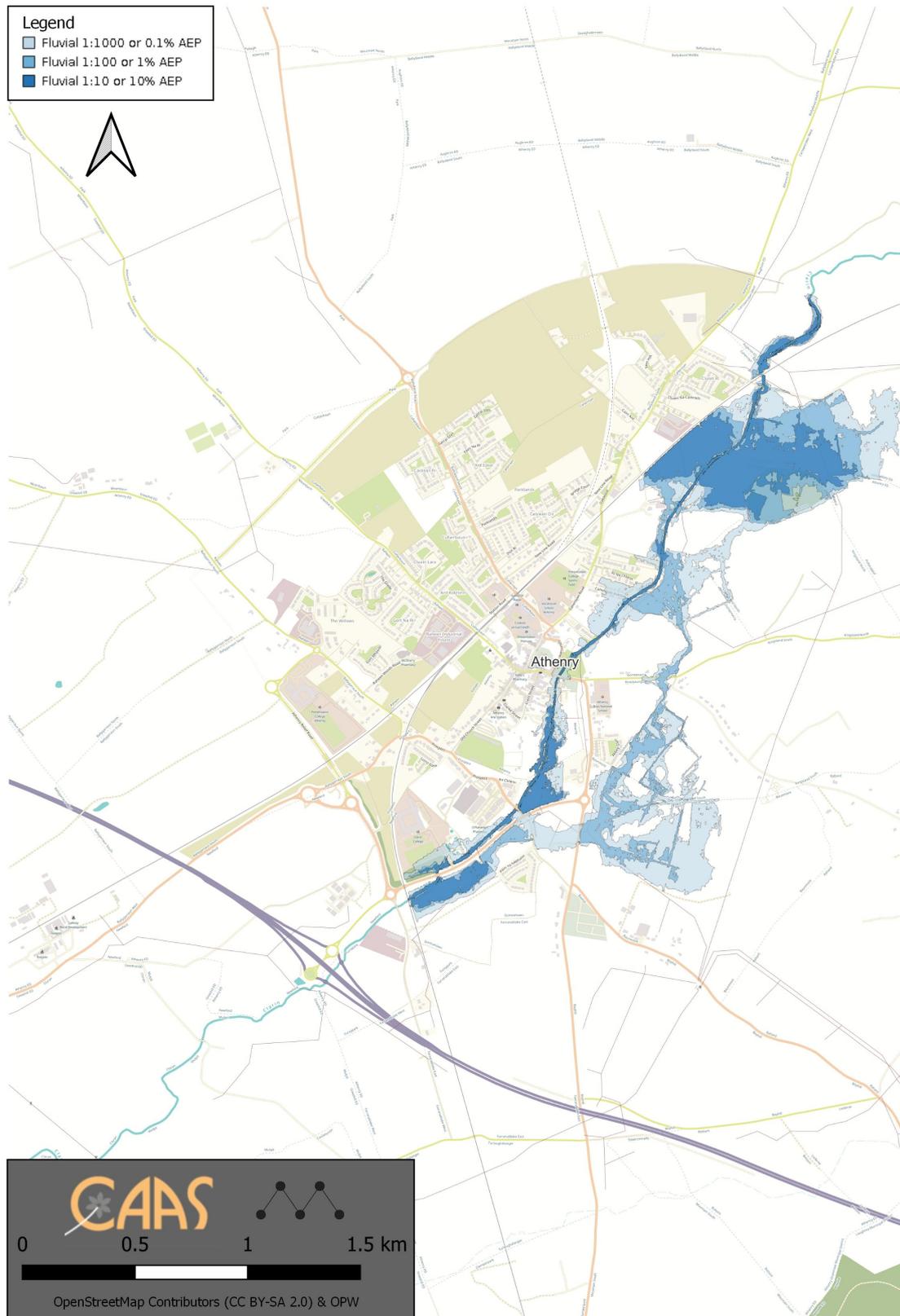
Selection of Indicators – NIFM High-End Future Scenario



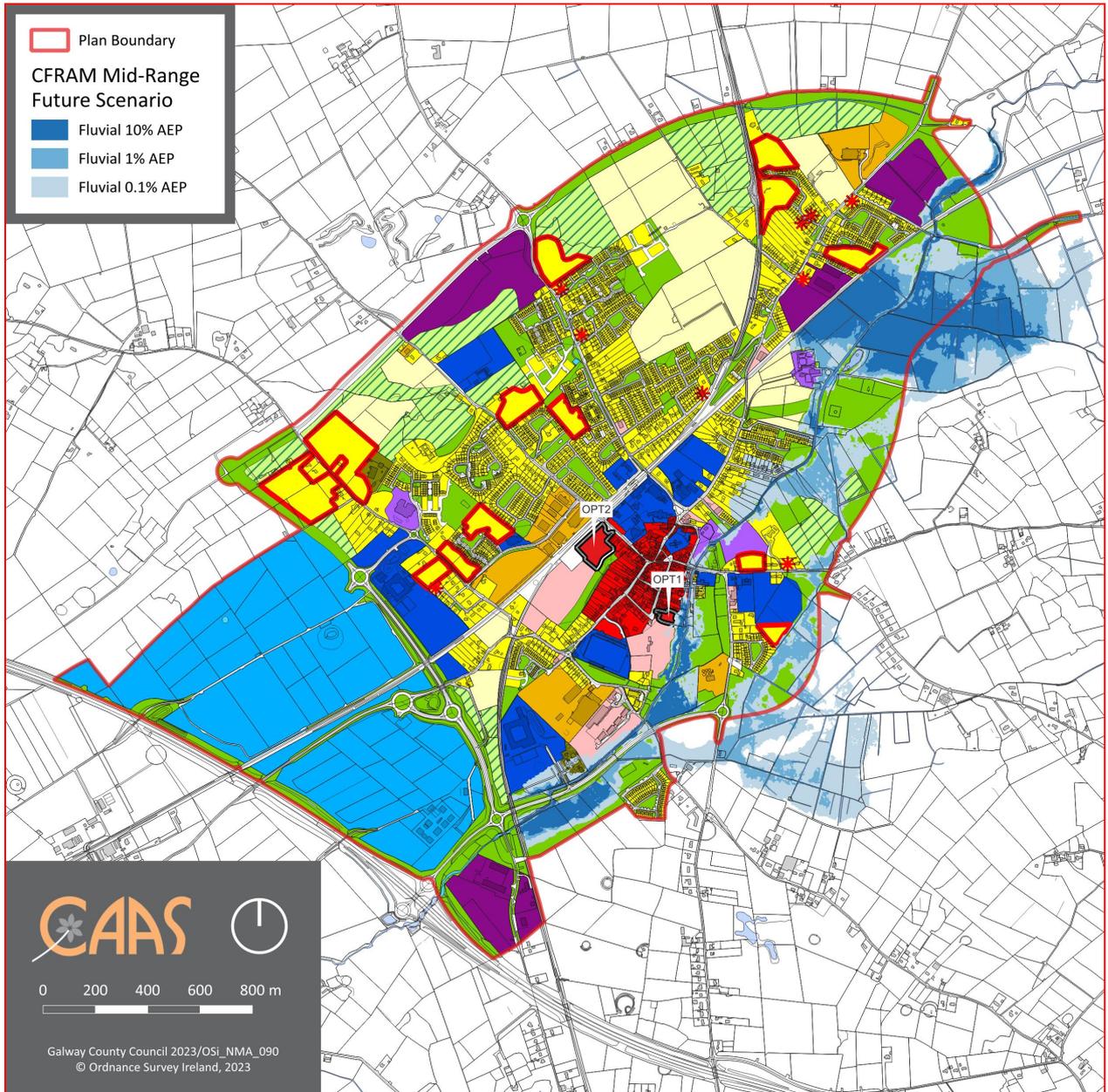
CFRAMS Present Day



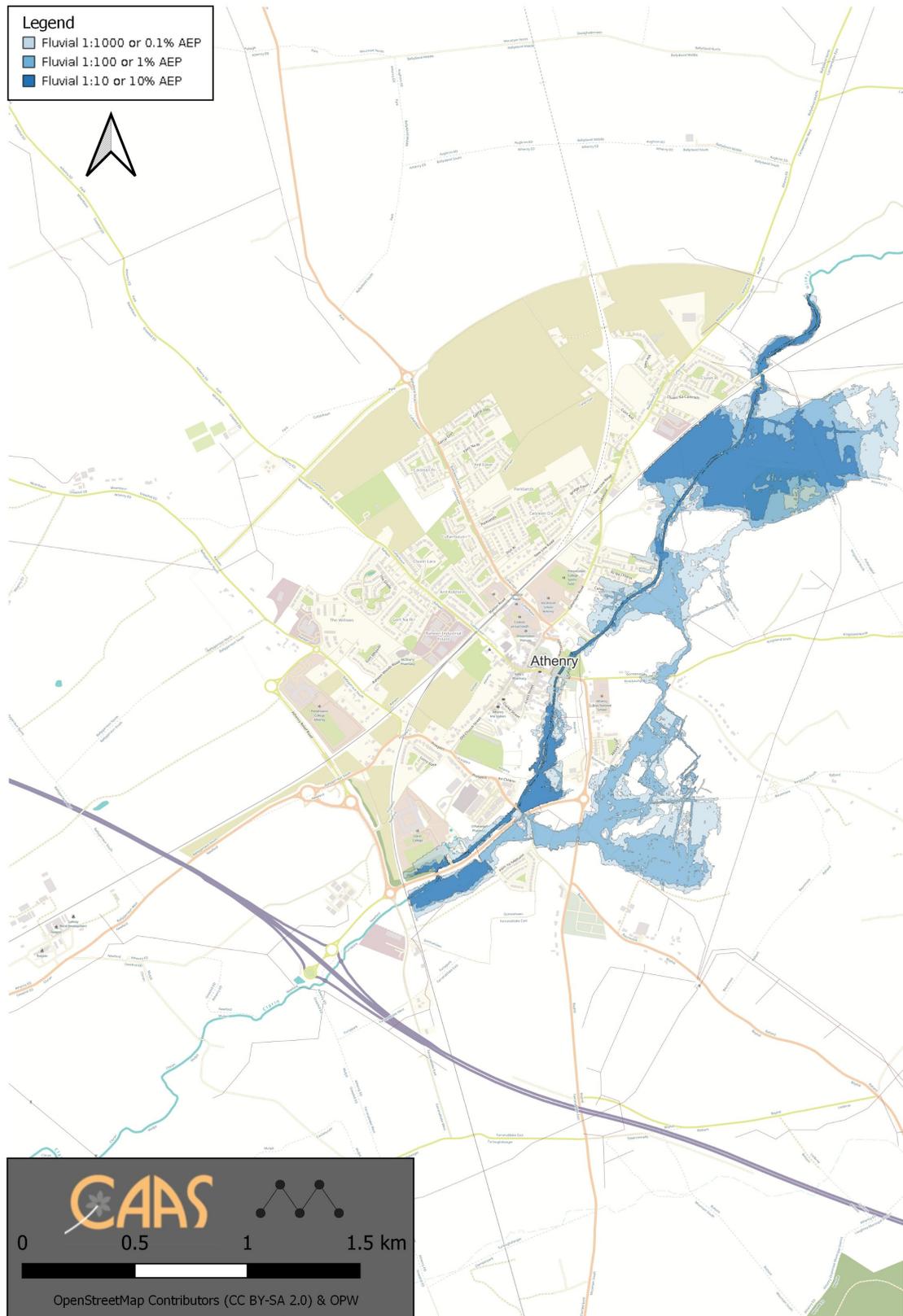
Map added following public display: CFRAMS Present Day overlain with Land Use Zoning from Draft Plan



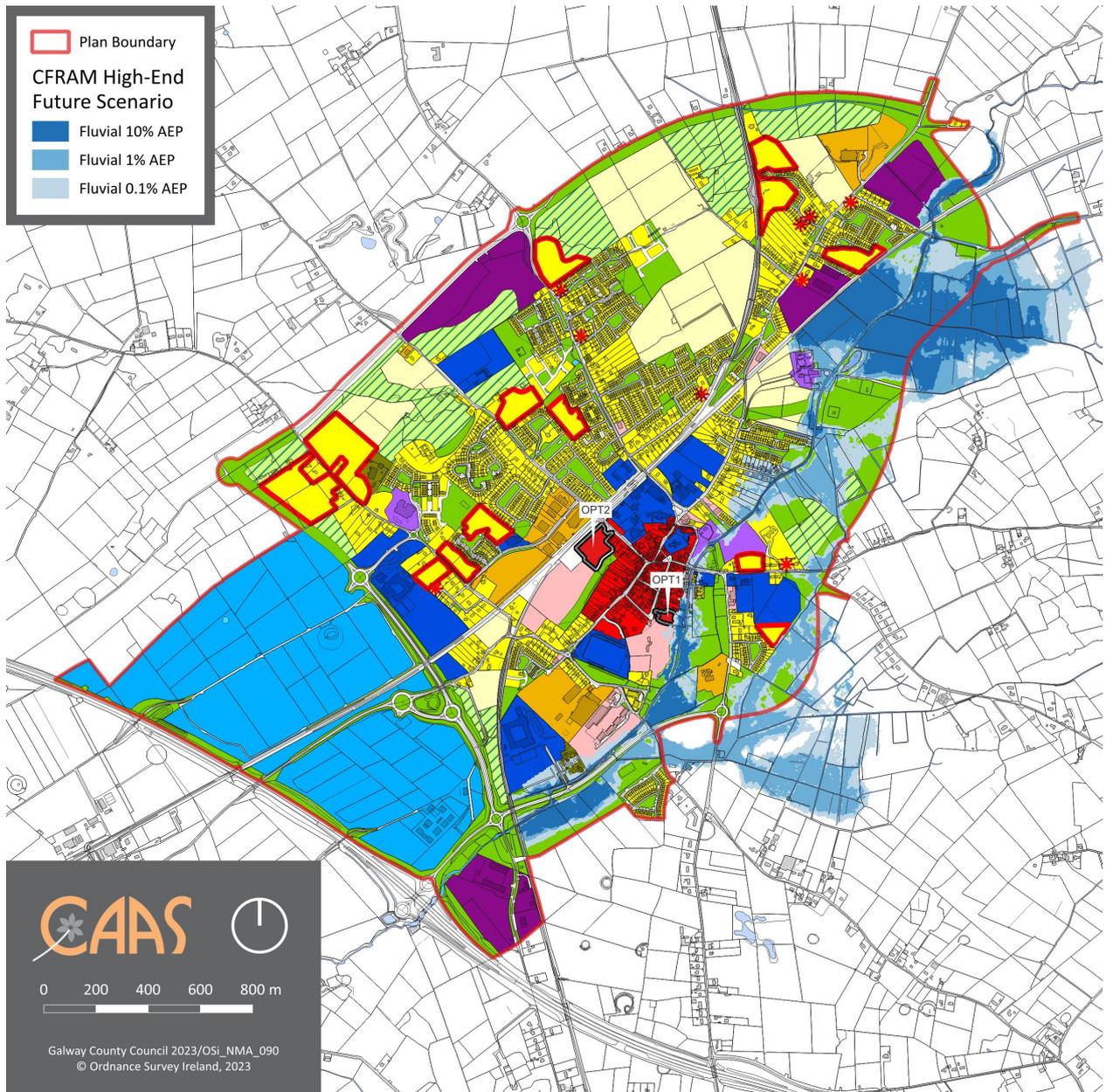
CFRAMS Mid-Range



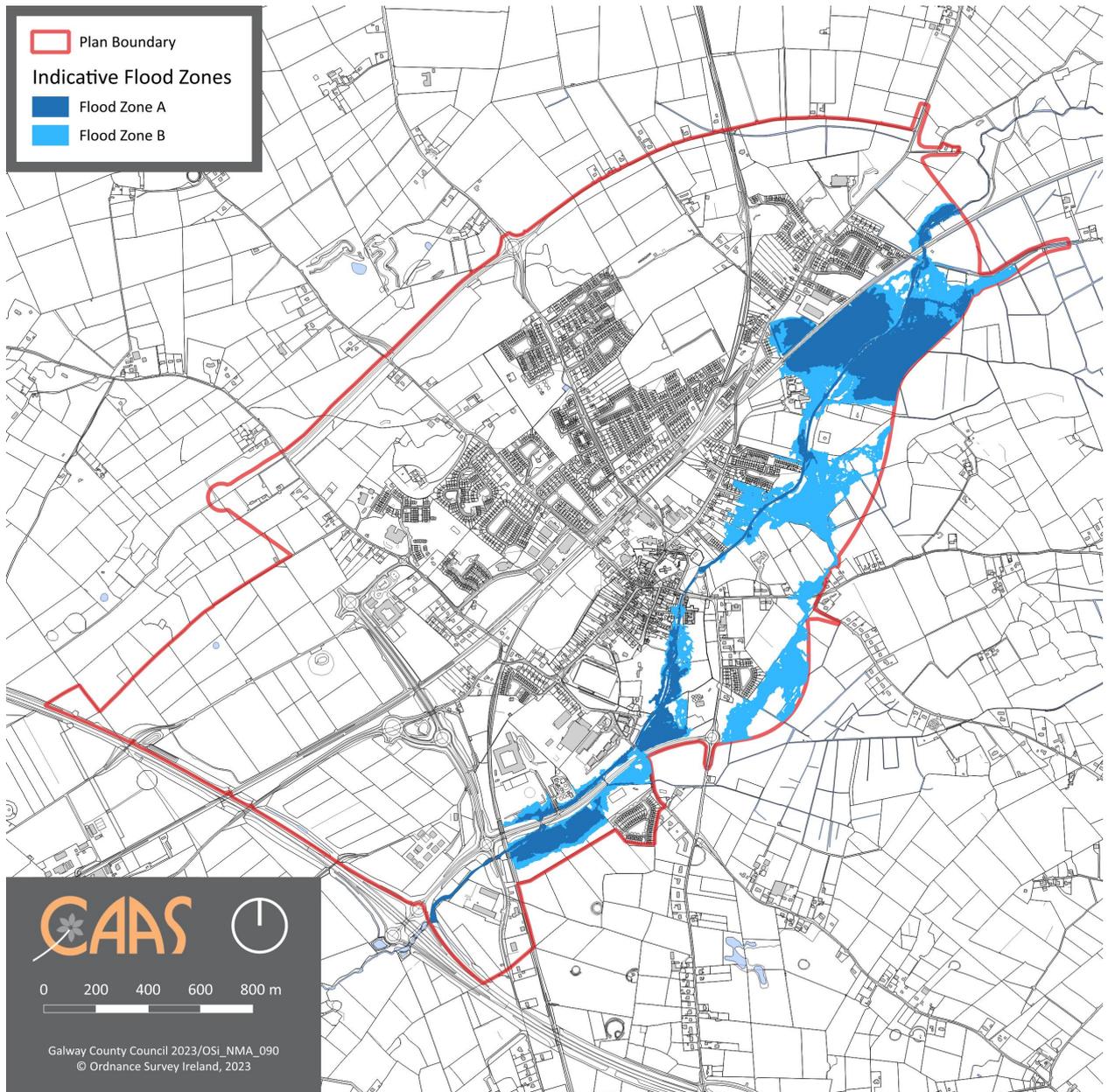
Map added following public display: CFRAMS Mid-Range overlain with Land Use Zoning from Draft Plan



CFRAMS High End



Map added following public display: CFRAMS High End overlain with Land Use Zoning from Draft Plan



Map Revised following public display: Flood Zones A and B

Appendix G – List of Submissions Received

Prescribed Authority			
	Submission No.	Name	Date Received
1	GLW-C60-101	Office of the Planning Regulator	01/01/2023
2	GLW-C60-25	North Western Regional Assembly	03/07/23
3	GLW-C60-127	Uisce Éireann	07/07/23
4	GLW-C60-112	Department of Housing, Local Government and Heritage	06/07/23
5	GLW-C60-70	Department of Environment, Climate Change and Communication	06/07/23
6	GLW-C60-57	Department of Agriculture, Food, and the Marine	06/07/23
7	GLW-C60-27	Department of Education	03/07/23
8	GLW-C60-45	Office of Public Works	05/07/23
9	GLW-C60-14	Transport Infrastructure Ireland	29/06/23
10	GLW-C60-64	National Transport Authority	06/07/23
11	GLW-C60-2	Environmental Protection Agency	31/05/23
12	GLW-C60-5	Tipperary County Council	14/06/23

General Submission			
	Submission No.	Name	Date Received
13	GLW-C60-8	Paul Johnston	22/06/23
14	GLW-C60-9	Nathalie Holian	23/06/23
15	GLW-C60-35	Aoife Lynch	04/07/23
16	GLW-C60-36	Pat Monaghan	04/07/23
17	GLW-C60-66	Nathalie Holian	06/07/23
18	GLW-C60-78	Fern Hill and Stonehaven Residents	07/07/23
19	GLW-C60-106	Patricia Foley	07/07/23
20	GLW-C60-113	Ronan Mc Carthy (on behalf of Fern Hill and Stonehaven Residents)	06/07/23
21	GLW-C60-122	Nicola Condon Egan & Alan Egan	07/07/23
22	GLW-C60-11	Simon Tear	28/06/23
23	GLW-C60-12	Mary Mannion	28/06/23
24	GLW-C60-13	Karen O'Hara	28/06/23
25	GLW-C60-15	Dominic Fallon	29/06/23
26	GLW-C60-16	Jonathan Ryan	29/06/23
27	GLW-C60-17	Barry Hynes	30/06/23
28	GLW-C60-19	Kieran Barrett	03/07/23
29	GLW-C60-22	B.Kelly and C.Flannery (on behalf of Cullairbaun Residents)	03/07/23
30	GLW-C60-23	Mary Cunniffe	03/07/23
31	GLW-C60-24	James Cunniffe	03/07/23
32	GLW-C60-28	David and Malgorzata Kelly	03/07/23

33	GLW-C60-30	Justyna Szymanska	30/06/23
34	GLW-C60-31	Naomi Kelly	03/07/23
35	GLW-C60-34	Jaclyn Glynn	04/07/23
36	GLW-C60-41	Eoin Mc Donagh	05/07/23
37	GLW-C60-42	Jacek Szymanski	05/07/23
38	GLW-C60-43	Michael Flannery	05/07/23
39	GLW-C60-46	Joanne Cullen	05/07/23
40	GLW-C60-49	Elaine Cunniffe	05/07/23
41	GLW-C60-59	Breda Kelly	05/07/23
42	GLW-C60-60	Jessica Tear	05/07/23
43	GLW-C60-61	Elaine Connolly	05/07/23
44	GLW-C60-62	Martin Cullen	05/07/23
45	GLW-C60-63	Jimmy Connolly	05/07/23
46	GLW-C60-65	Eileen Caulfield	06/07/23
47	GLW-C60-67	Anna Zukower	06/07/23
48	GLW-C60-109	Louise Devine	07/07/23
49	GLW-C60-126	Grace Cullen	07/07/23
50	GLW-C60-48	Caitriona Griffin	05/07/23
51	GLW-C60-50	Conor Hurley	05/07/23
52	GLW-C60-74	Peter Suillivan	06/07/23
53	GLW-C60-121	Kevin Mc Coy	07/07/23
54	GLW-C60-105	Sharon Crowe	07/07/23
55	GLW-C60-77	MKO (on behalf of Kiera Hanney)	07/07/23
56	GLW-C60-99	MKO on behalf of Highgate Ltd.)	07/07/23
57	GLW-C60-37	Eamon Madden	04/07/23
58	GLW-C60-79	MKO (on behalf of Bellerin 3A Limited)	07/07/23
59	GLW-C60-38	Mary Rabbitte	04/07/23
60	GLW-C60-114	A Marten (on behalf of Coffey Group)	07/07/23
61	GLW-C60-53	Grady Architects (on behalf of Roonith Properties)	05/07/23
62	GLW-C60-81	MKO (on behalf of Caheroyn MB Developments Ltd.)	07/07/23
63	GLW-C60-82	MKO (on behalf of Joe Hoade)	07/07/23
64	GLW-C60-83	MKO (on behalf of Coffey Off-Site Ltd.)	07/07/23
65	GLW-C60-40	John Coyne	04/07/23
66	GLW-C60-133	Alan Kelly	07/07/23
67	GLW-C60-98	MKO (on behalf of CLS Recruitment Group Ltd.)	07/07/23
68	GLW-C60-76	FDG Engineering and design (on behalf of R Brady)	07/07/23
69	GLW-C60-87	Tourlecan Development Ltd.	07/07/23
70	GLW-C60-95	Planning Consultancy Services (on behalf of T.J Divilly)	07/07/23
71	GLW-C60-20	Matthew Kidney	03/07/23
72	GLW-C60-21	Lisa Bailey	03/07/23
73	GLW-C60-32	Elizabeth Conneely	03/07/23
74	GLW-C60-72	Yvonne Leonard	06/07/23
75	GLW-C60-86	Patrick Carthy	07/07/23

76	GLW-C60-111	Tracey Moriarty	06/07/23
77	GLW-C60-117	Anna Falkenau	07/07/23
78	GLW-C60-118	Niamh Mc Elwaine	07/07/23
79	GLW-C60-119	Christina Caulfield	07/07/23
80	GLW-C60-120	Patrick Creed	07/07/23
81	GLW-C60-125	Audrey O'Connor	07/07/23
82	GLW-C60-128	Shirely Lambourn	07/07/23
83	GLW-C60-56	Agnieszka Kudlacik	06/07/23
84	GLW-C60-75	Matthew Piggott	06/07/23
85	GLW-C60-71	Grealish Glynn & Associates (on behalf of Noel and Sharon Lally)	06/07/23
86	GLW-C60-89	Planning Consultancy Services (on behalf of Laurem Construction Ltd.)	07/07/23
87	GLW-C60-47	Patrick Hanley	05/07/23
88	GLW-C60-69	Paddy Kennedy (on behalf of Mattie Kennedy)	06/07/23
89	GLW-C60-3	JG Quirke Associates	14/06/23
90	GLW-C60-6	JG Quirke Associates	21/06/23
91	GLW-C60-7	Ryehill Planning and Design (on behalf of Belville Construction)	22/06/23
92	GLW-C60-91	Planning Consultancy Services (on behalf of Leadlane Ltd)	07/07/23
93	GLW-C60-96	MKO (on behalf of Kathleen Coffey)	07/07/23
94	GLW-C60-104	Ruth and Joe Maloney	07/07/23
95	GLW-C60-29	Colin Parr	03/07/23
96	GLW-C60-58	Norman Walsh	05/07/23
97	GLW-C60-102	Sara Walls	07/07/23
98	GLW-C60-132	Kevin Mc Loughlin	06/07/23
99	GLW-C60-39	RMLA (on behalf of Tesco Ireland)	04/07/23
100	GLW-C60-85	Genesis Planning and Urban Design on of Ghost Zapper Ltd (as part of Comer Group)	07/07/23
101	GLW-C60-123	Genesis Planning and Urban Design on of Ghost Zapper Ltd (as part of Comer Group)	07/07/23
102	GLW-C60-94	Planning Consultancy Services on behalf of RHOC (Athenry) Ltd	07/07/23
103	GLW-C60-92	Planning Consultancy Services on behalf of RHOC (Athenry) Ltd	07/07/23
104	GLW-C60-107	Paul and Deirdre Whelan	07/07/23
105	GLW-C60-90	MKO on behalf of IDA Ireland	07/07/23
106	GLW-C60-68	Paddy Kennedy on behalf of Kevin Burke	06/07/23
107	GLW-C60-44	Oliver and Geraldine Whelan	05/07/23
108	GLW-C60-84	MKO on behalf of Production Equipment UC	07/07/23
109	GLW-C60-93	Planning Consultancy Service on behalf of T.J Divilly	07/07/23
110	GLW-C60-18	Galway and Roscommon Education and Training Board	30/06/23
111	GLW-C60-88	Planning Consultancy Service on behalf of Pat Joyce	07/07/23
112	GLW-C60-26	Joseph Killeen	03/07/23
113	GLW-C60-80	Rory Mc Carthy	07/07/23
114	GLW-C60-73	John and Nadine Martin	06/07/23
115	GLW-C60-108	Joe and Eileen Glynn	06/07/23

116	GLW-C60-4	Brendan McGuinness	15/06/23
117	GLW-C60-115	Gerry Burke	06/07/23
118	GLW-C60-103	The Wheels of Athenry	07/07/23
119	GLW-C60-51	Conor Hurley	05/07/23
120	GLW-C60-52	Conor Hurley	05/07/23
121	GLW-C60-54	Gareth Mc Elhinney	06/07/23
122	GLW-C60-97	Michael Scott	07/07/23
123	GLW-C60-124	Dr Ellis Ward	07/07/23
124	GLW-C60-100	John Carroll (on behalf of Athenry Tidy Towns Committee)	07/07/23
125	GLW-60-10	Jim Reidy (on behalf of Athenry Tidy Towns)	24/06/23
126	GLW-C60-134	Brian Reidy	07/07/23
127	GLW-60-1	Martin Lavelle	02/06/23
128	GLW-C60-55	Gareth Mc Elhinney (on behalf of Friends of Athenry House)	06/07/23
129	GLW-C60-110	Athenry Historical Society	07/07/23
130	GLW-C60-33	Nick and Maria Hitchcox	03/07/23
131	GLW-C60-116	Galway Environmental Network	06/07/23
132	GLW-C60-129	Cyril Bowman	07/07/23