



Comhairle Chontae na Gaillimhe
Galway County Council

Draft

Tuam Local Area Plan

2023-2029

August 2023

Chief Executive's Report on
Submissions Received on the
Material Alterations to the Draft
Tuam LAP 2023 - 2029

Draft Tuam Local Area Plan 2023-2029

Chief Executive's Report on Submissions Received on the Material
Alterations to the Draft Tuam Local Area Plan 2023-2029

CHIEF EXECUTIVE'S REPORT

Forward Planning Policy Unit

Galway County Council

Áras an Chontae

Prospect Hill

Galway



Comhairle Chontae na Gaillimhe
Galway County Council

1. Chief Executive's Report Introduction

1.1 Legislative Requirements Relating to the Local Area Plan

This report forms part of the statutory procedure for the making of a Local Area Plan and has been prepared following the receipt of submissions and observations with respect to the proposed Material Alterations to the Tuam Local Area Plan 2023-2029 received pursuant to a notice required by Section 20(3)(k) of the Planning and Development Act 2000 (as amended).

In accordance with Section 20 of the Planning and Development Act, 2000 (as amended) this report shall include the following:

- (i) list the persons or bodies who made submissions or observations,
- (ii) summarise the following from the submissions or observation made under this section:
 - (I) issues raised by the Minister, and
 - (II) thereafter issues raised by other bodies or persons
- (iii) give the response of the Chief Executive to the issues raised, 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 policy objectives for the time being of the Government or of any Minister of the Government.

Under Section 20(3)(f) of the Planning and Development Act 2000 (as amended) Galway County Council has determined that a Strategic Environmental Assessment (SEA) is required with respect to certain Proposed Material Alterations; and Stage 2 Appropriate Assessment (AA) is not required for any Proposed Material Alteration.

A copy of the proposed Material Alterations, the SEA and AA Screening Reports, were available for public inspection during normal opening hours from Tuesday 27th June 2023 to Wednesday 26th July 2023, (both dates inclusive).

1.2 Compliance with Environmental Legislation

In compliance with Section 20 (3)(f) of the Planning and Development Act 2000 (as amended), both Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) screening determinations were made by Galway County Council with regard to Material Alterations (MA) proposed after the public display of the Proposed Draft Plan.

It was determined that the Material Alterations (MA 1 to MA 62) did not require a Stage 2 AA and the following Material Alterations require SEA and consideration in a SEA Environmental Report:

- MA9
- MA38
- MA39
- MA49
- MA50
- MA51
- MA55
- MA56

1.3 Chief Executive's Report to the Elected Members

The report of the Chief Executive must be prepared and submitted to the Members of the Planning Authority. This report is being distributed to the Tuam Municipal District Members in August 2023. In accordance with Section 20 of the Planning and Development Acts, 2000 as amended, the Members of the Planning Authority shall consider the proposed Material Alterations and the report of the Chief Executive. Following this, the Members may resolve to make the Local Area Plan, either with or without the proposed Material Alterations. A further modification to the Local Area Plan –

- (i) may be made where it is minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site;
- (ii) shall not be made where it refers to an increase in the area of land zoned for any purpose, or an addition to or deletion from the Record of Protected Structures.

In making the Local Area Plan, the Members shall be restricted to considering the proper planning and sustainable development of the area to which the Local Area Plan relates, the statutory obligations of any Local Authority in the area and any relevant policies or objectives for the time being of the Government or any Minister of the Government.

A Local Area Plan once made shall have effect 6 weeks from the day it is made.

1.4 Structure and Content of the Chief Executive's Report

1.4.1 Issues, Responses and Recommendations

The Draft Tuam Local Area Plan 2023-2029 was placed on public display for 6 weeks, from Wednesday 8th February 2023 until Thursday 23th March 2023 (inclusive).

The Chief Executive's Report was circulated to the Elected Members on 8th May 2023. The Elected Members of the Tuam Municipal District held a Special meeting on the 6th June 2023 and agreed to Material Alterations to the Local Area Plan, thereby necessitating a further public display period.

A copy of the proposed Material Alterations to the Draft Tuam Local Area Plan 2023-2029, the associated environmental reports, were available for inspection during normal opening hours from Tuesday 27th June 2023 until Wednesday 26th July 2023 (both dates inclusive).

During the public consultation period, submissions were received in relation to the proposed Material Alterations to the Draft Tuam LAP. In this regard a total of 11 submissions were received. 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 submissions received have been divided into groupings comprised of the following:

- Prescribed Authorities
- Members of the General Public

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 2006 and the Planning and Development (SEA) Regulations 2004 as amended. 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 the proposed material alterations to the Draft Tuam Local Area Plan 2023-2029:

- Existing Text of Local Area Plan – Shown in black text
- Proposed Addition – Shown in red text highlighted yellow
- Proposed Deletion – Shown with a strikethrough

Once the Elected Members have made their decisions regarding the proposed Material Alterations, all agreed deletions will be removed, and any agreed additions and consequential changes will be inserted into the Final Tuam Local Area Plan 2023-2029.

1.4.2 List of Submissions Received

This includes a list of all submissions received on the Material Alterations to the Draft Tuam Local Area Plan 2023-2029:

Submissions received – 11

	Name	Date Received
1	Office of Planning Regulator	26/07/2023
2	Northern and Western Regional Assembly	26/07/2023
3	Dept of Housing, Local Government and Heritage	26/07/2023
4	Environmental Protection Agency (EPA)	13/07/2023
5	Transport Infrastructure Ireland (TII)	13/07/2023
6	National Transport Authority (NTA)	25/07/2023
7	Uisce Éirann	26/07/2023
8	Office of Public Works (OPW)	26/07/2023
9	Dept of Education, Forward Planning & Site Acquisition Section	18/07/2023
10	Denis C. Higgins	06/07/2023
11	Brock McClure Planning and Development Consultants	25/07/2023

2. Submissions

Office of Planning Regulator

GLW-62-11

The Office of the Planning Regulator (OPR) considers the Draft Local Area Plan (LAP) to be generally consistent with the NPF, the RSES and the core strategy of the Development Plan. The Office commends the Planning Authority for the presentation of amendments to ensure alignment with national and regional policies and associated section 28 guidelines concerning compact, growth, flood risk management and employment zoned land.

It is within this context that the submission sets out three Recommendations and two Observations under five themes:

1. Core Strategy and Land Use Zoning for Residential Use

The Office has concerns regarding, MA32, MA38, MA49, MA40, MA58. The proposed Material Amendments include a further 11ha representing an increase of approx. 26% of Residential Phase 1 lands. Several material amendments are poorly located and are not necessary to ensure a sufficient supply of zoned land consistent with the core strategy of the Development Plan.

MA32 is a sizable parcel of land in the context of the core strategy. It adjoins land within a Flood Zone A which would have implications for any potential access arrangements. The rezoning of land would not represent a sequential approach to zoning, and as such would be inconsistent with section 6.2.3 of the *Development Plans, Guidelines for Planning Authorities (2022)*.

MA38 and MA49 are removed from the town centre. There is undeveloped zoned residential land that is serviced and preferably located closer to services and amenities to the town centre. The Appendix III of the SEA Environmental Report also notes that *'...development at these locations would conflict with established higher-level objectives relating to compact growth, sustainable mobility and transition to a low carbon and climate resilient society.'*

MA40 and MA58 and the zoning to Residential Phase 2 from outside Plan Boundary and Agriculture zoned land would undermine national and regional policy objectives to achieve compact growth and development in a sequential manner. It would result in leapfrogging zoned land, removed from services and inconsistent with the Development Plan Guidelines. The Office further notes proposed amendments are unjustified given that there are sufficient serviced lands zoned which are more suitably located to provide for consolidated plan-led growth in Tuam in accordance with national and regional policy objectives. Moreover, it is stated that TII in its submission has raised concerns, in relation to MA58, which adjoins the N17 national primary road, as the rezoning would compromise future potential upgrade works and are not in the interests of proper planning and sustainable development.

MA Recommendation 1 – Land Use Zoning for Residential Use

Having regard to:

- national and regional policy objectives NPO 3, RPO 3.1 and RPO 3.2;
- the peripheral location of the lands and the policy and objective for the sequential approach to zoning in the *Development Plans, Guidelines for Planning Authorities (2022)*; and
- the core strategy of the Galway County Development Plan 2022-2028, the planning authority is required to make the LAP without the following amendments:
 - (i) MA32 – from Agriculture to Residential (Phase 1);
 - (ii) MA38 – from Residential (Phase 2) to Residential (Phase 1);
 - (iii) MA49 – from Residential (Phase 2) to Residential (Phase 1);
 - (iv) MA40 – from Outside Plan Boundary to Residential (Phase 2); and
 - (v) MA58 – from Agriculture to Residential (Phase 2)

Chief Executive's Response:

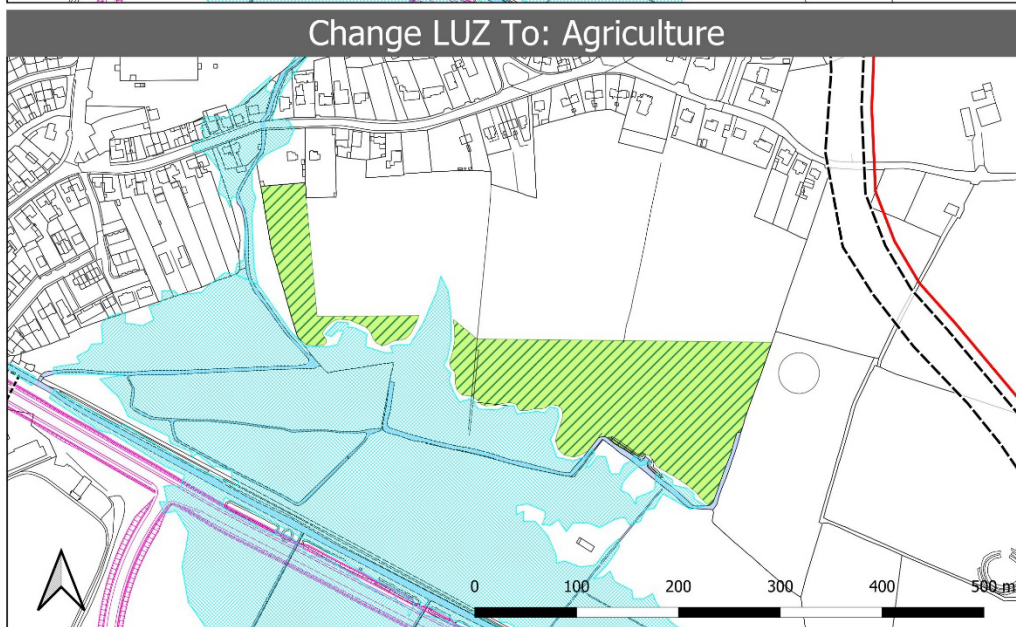
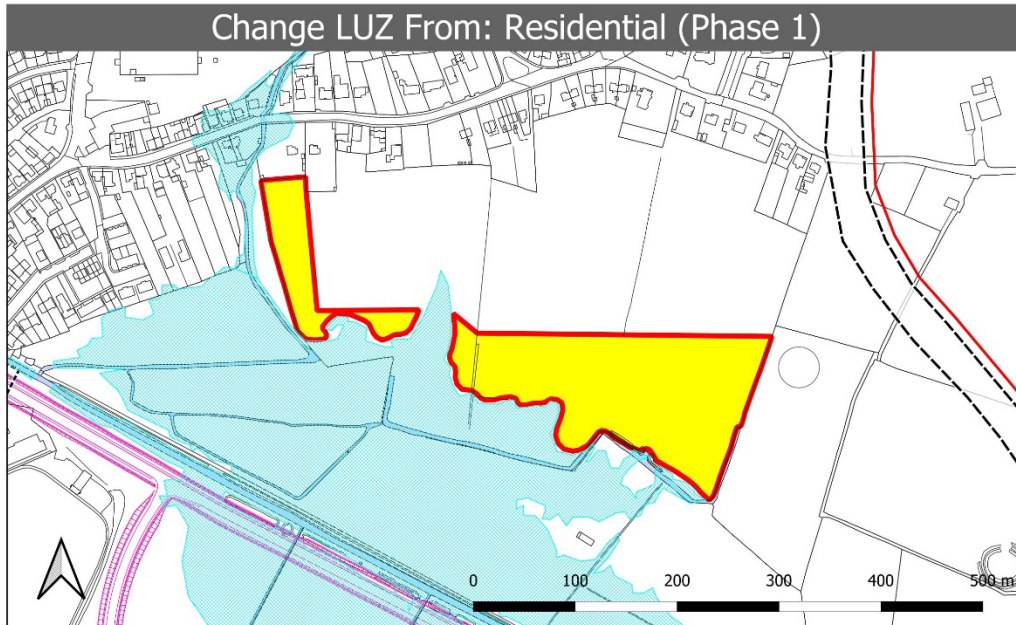
The contents of the submission are noted. The Planning Authority concurs with the view of the OPR with regards to Material Alterations MA32, MA38, MA49, MA40 and MA58 and the lands subject to these Material Alterations should revert as per the Draft Tuam LAP.

Chief Executive's Recommendation:

- i. **MA32:** Revert to the provisions of the Draft Tuam LAP where these lands were zoned Agriculture.

Land Use Zoning for Residential Use

Material Alteration: MA32
Change Zoning From: Residential (Phase 1)
Change Zoning to: Agriculture
Area: 3.64 Ha.



- ii. **MA38:** Revert to the provisions of the Draft Tuam LAP where these lands were zoned Residential Phase 2.

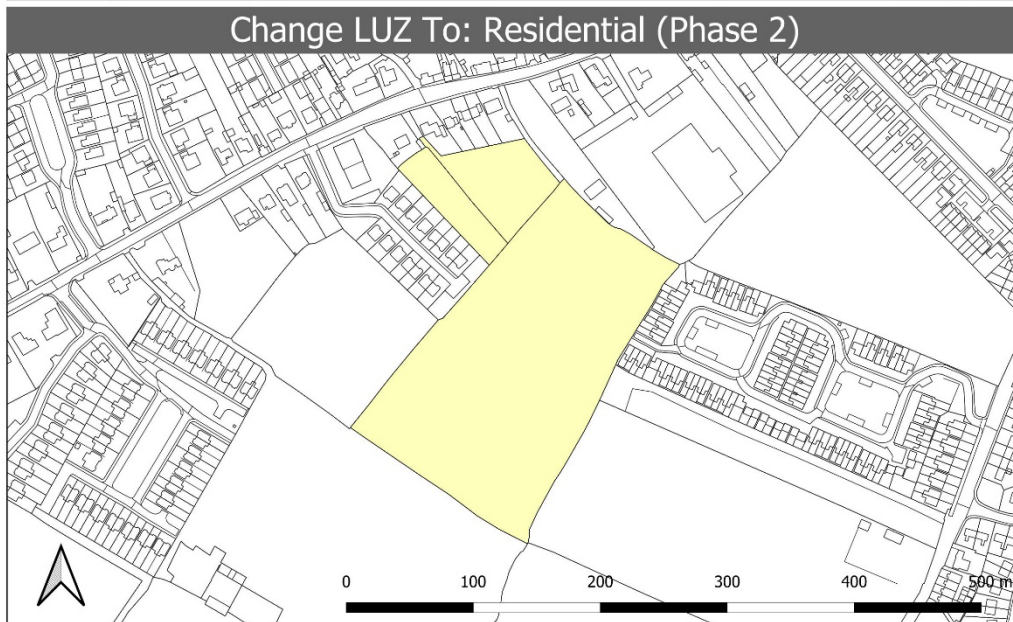
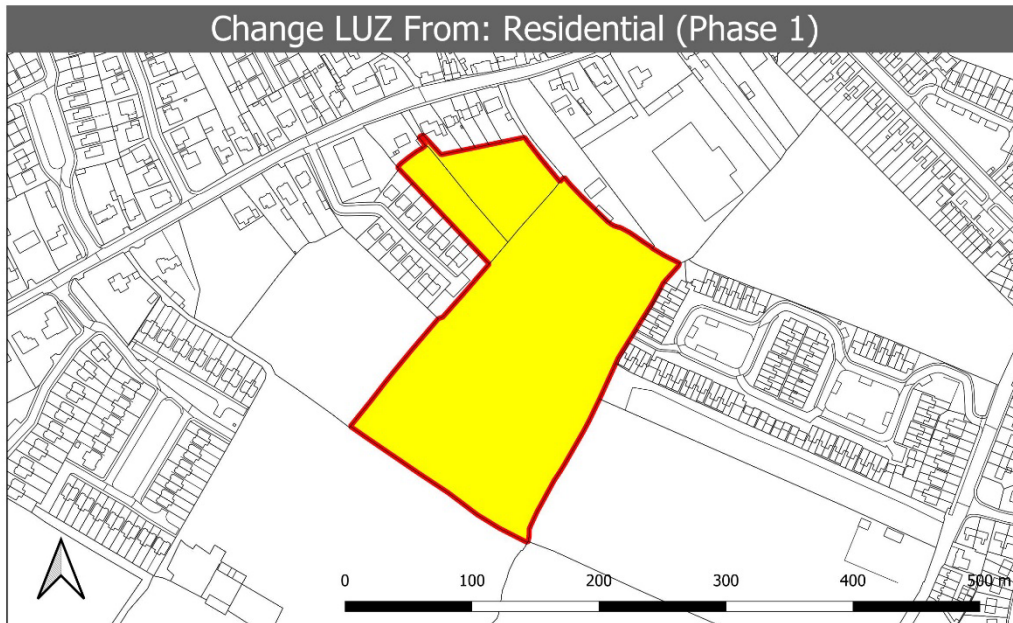
Land Use Zoning for Residential Use

Material Alteration: MA38

Change Zoning From: Residential (Phase 1)

Change Zoning to: Residential (Phase 2)

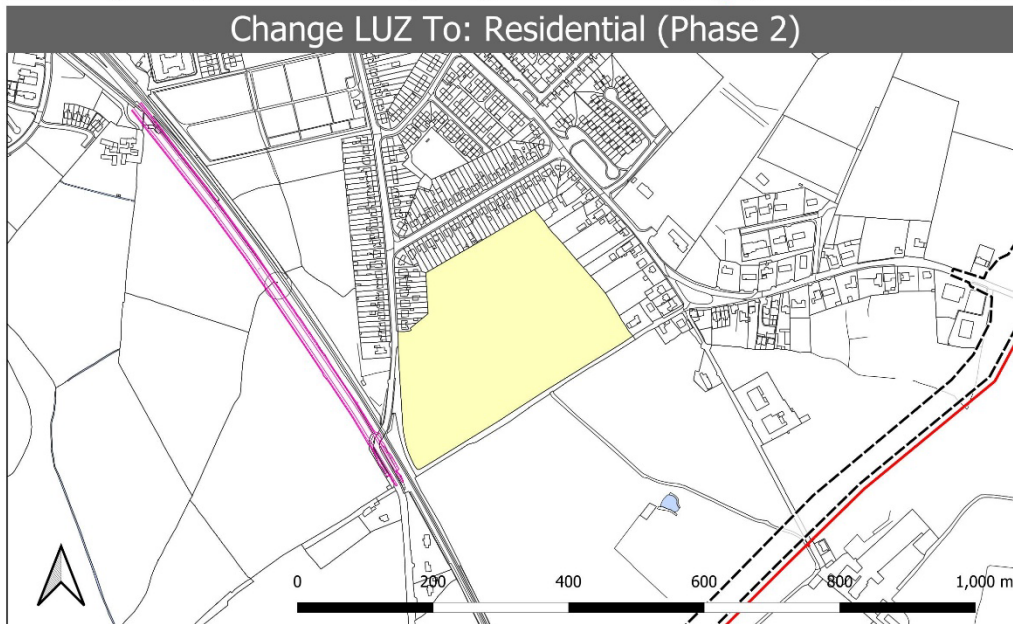
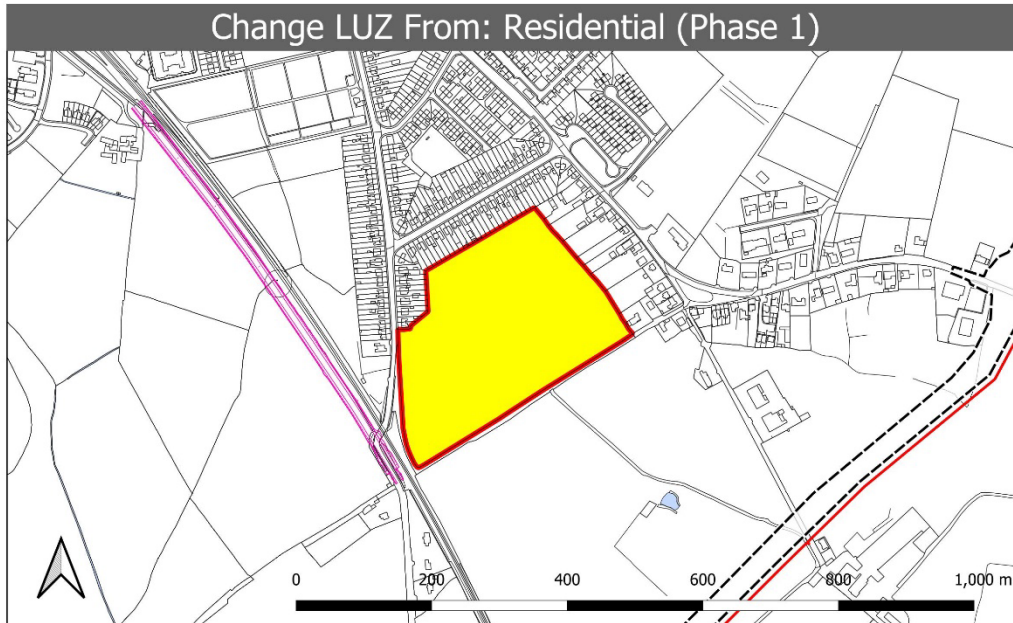
Area: 4.132 Ha.



- iii. **MA49:** Revert to the provisions of the Draft Tuam LAP where these lands were zoned Residential Phase 2.

Land Use Zoning for Residential Use

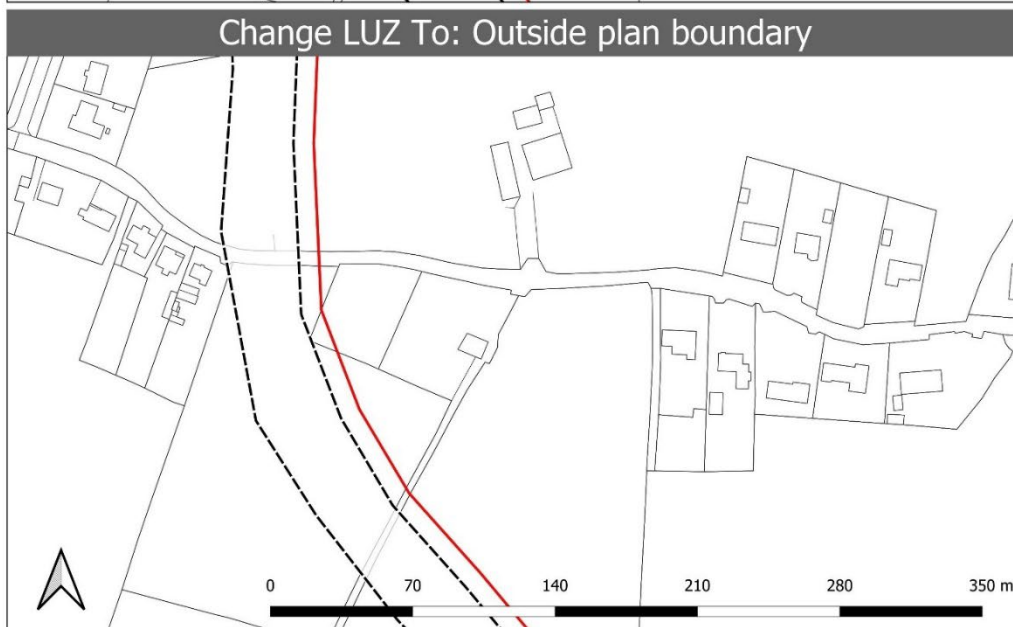
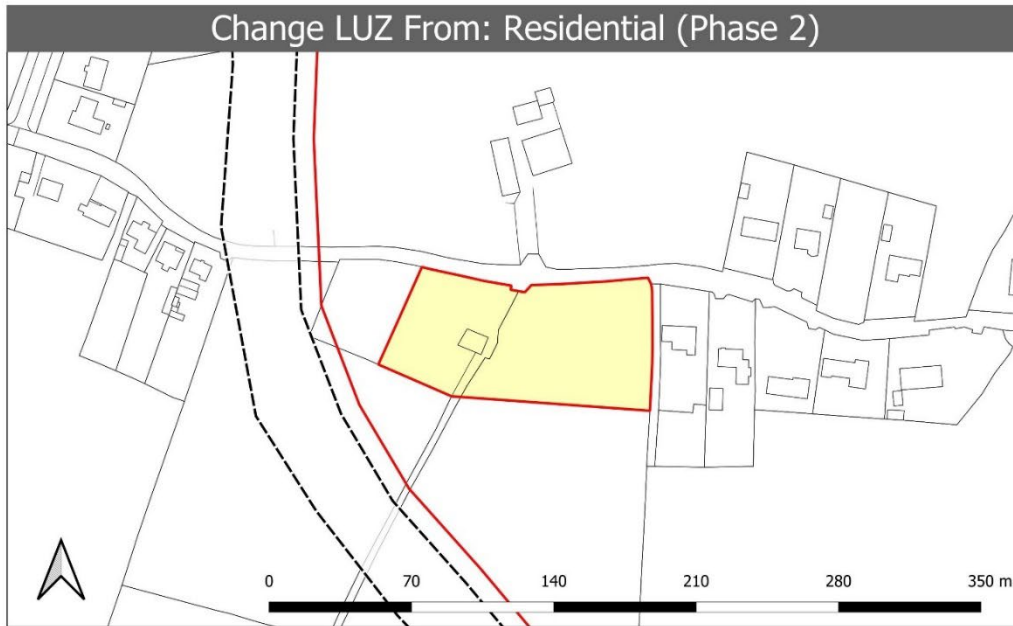
Material Alteration: MA49
Change Zoning From: Residential (Phase 1)
Change Zoning to: Residential (Phase 2)
Area: 7.322 Ha.



- iv. **MA40:** Revert to the provisions of the Draft Tuam LAP where these lands where not zoned.

Land Use Zoning for Residential Use

Material Alteration: MA40
Change Zoning From: Residential (Phase 2)
Change Zoning to: Outside plan boundary
Area: 0.734 Ha.



- v. **MA58:** Revert to the provisions of the Draft Tuam LAP where these lands were zoned Agriculture.

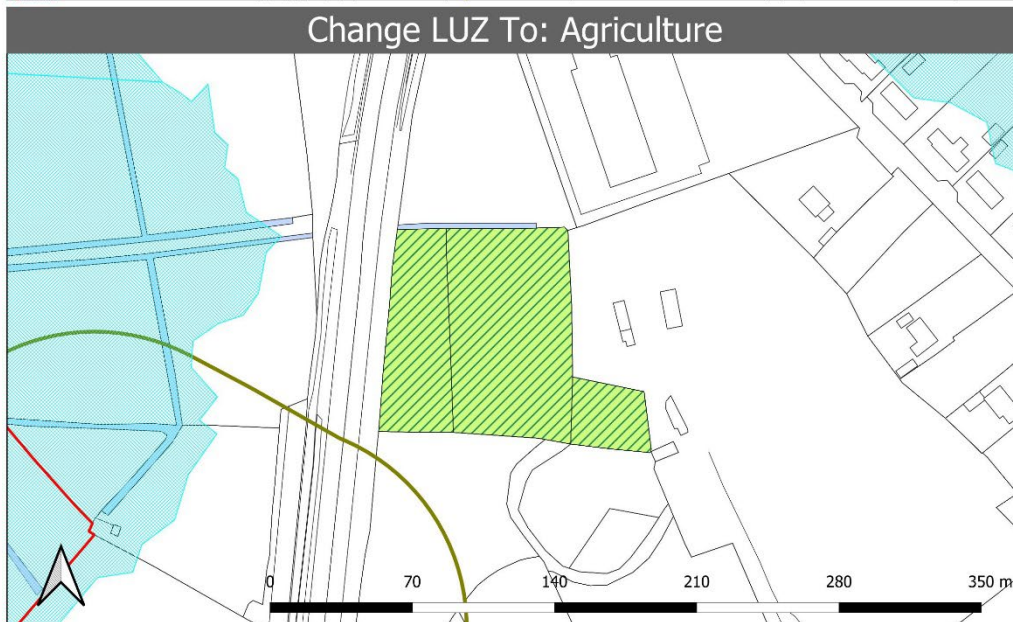
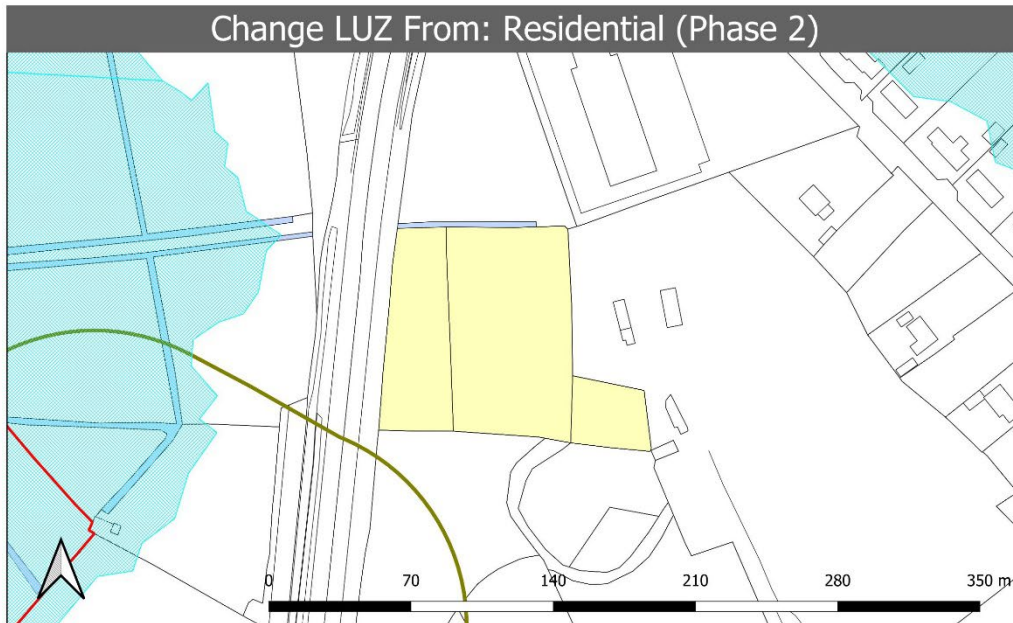
Land Use Zoning for Residential Use

Material Alteration: MA58

Change Zoning From: Residential (Phase 2)

Change Zoning to: Agriculture

Area: 1.04 Ha.



2. Regeneration

The OPR welcomes the inclusion of policy objectives to set out an approach to active land management in order to address town centre vacancy and to set out measurable targets for the reduction of vacancy for the plan period. The Office considers nonetheless important by a minor modification that the Draft Tuam LAP sets out measurable targets for the reduction of vacancy and identifies the critical measures and/or actions the planning authority will implement to address.

MA Observation 1 – 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, by minor modification, proposed material amendments policy objectives TKT 60 and/or TKT 61 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:

Following the OPR recommendation on their submission made to the Draft Tuam LAP, *Policy Objective TKT 60 Strategic sites* in Tuam and *Policy Objective TKT 61 Active Land Management* has been included. The establishment of a database of strategic brownfield and infill sites for Tuam will aid the Planning Authority in addressing vacancy within Tuam. The specifics in relation to measurable targets will be examined as part of implementing the policy objectives within all LAPs within the County and further analysis of census data will form the baseline for these measurable targets.

Chief Executive's Recommendation:

No Change.

3. Land Use Zoning for Employment

The Office states they sought an evidence-based rationale for the overall quantity and the spatial location of all employment generating land use zonings on their submission (GLW-C42-49) made to the Draft Tuam LAP. Specifically, the lands zoned Industry located on greenfield undeveloped land at the edge of Draft LAP boundary. The submission notes the Chief Executive's Response on the rationale for zoning the subject lands. It is not considered however to be a sufficient evidence-base to address the need for these lands to be zoned as per section 6.2.5 of the Development Plan Guidelines or NPO 72 of the NPF. The OPR states the decision of the local authority not to address Recommendation 3 of their submission (GLW-C42-49) made to the Draft Tuam LAP will be considered in the context of their final assessment of the adopted LAP. The submission outlines a number of Material Alterations which seek to change the lands zoned for employment uses. It is stated the Material Alterations do not include an Infrastructure Assessment in line with NPO 72(a-c) and it is not possible to determine if the additional employment lands are serviced or serviceable within the life of the LAP.

The submission states that the amended Local Transport Plan (LTP) does not include the extended Walking and Cycling Network Options to access the proposed employment lands, which would indicate an absence of coordination between the proposed additional zoning designation and the LTP. It is considered MA53 and MA54 situated north of the town, adjacent to a national primary road (N17) are less sequentially preferable compared to other employment zoned sites in the town. The OPR requests the rationale for MA54 proposing a zoning of land outside the settlement boundary and MA53 for the loss of Industrial zoned land.

The Office also notes TII's submission and concerns raised regarding MA54 which adjoins the N17, at a location where a 100kph speed limit applies. The Material Alteration does not include any evidence-base to demonstrate the proposed zoning of additional lands adhere to the requirements set out in Section 2.6 and/or Section 2.7 of the section 28 Ministerial *Guidelines Spatial Planning and National Roads Guidelines for Planning Authorities* (2012) (National Roads Guidelines).

Furthermore, the OPR considers that MA53 and MA54 and the proposed employment land use zonings, adjoining a national road is not of itself conducive to walking and cycling modes. This militates against the objectives of consolidation of the existing built urban footprint and conflicts with objectives in the Draft Tuam LAP to build a much stronger urban core and vibrant town centre.

The Office has raised concerns regarding Material Alterations MA42, MA50, MA51, MA52, MA55 and MA56 which are situated south-west of the town, in the vicinity of M17/N17/N83/R942. Section 2.7 of the National Roads Guidelines caution against the '...zoning of locations at or close to interchanges where such development could generate significant additional traffic with potential to impact on the national road.' It is considered that the overall approach in relation to employment zoned land has the potential to undermine and detract from the revitalisation of the town centre contrary to NPO 6 and RPO 3.1, and the requirement to implement a tiered approach to zoning under NPO 72a, NPO 72b and NPO 72c.

Recommendation 2 – 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;
- the absence of an Infrastructure Assessment in accordance with NPO72a-c;
- the National Strategic Objective for compact growth;
- the regeneration of towns under NPO 6 and RPO 3.1 and *Town Centre First: A Policy Approach for Irish Towns* (2022); and
- section 2.6 and Section 2.7 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012),

the planning authority is required to review the following proposed material amendments and appropriately reduce the quantity of land required to accommodate employment growth in Tuam;

- MA42 – from Agriculture to Business and Enterprise;
- MA50 – from Agriculture to Industrial;
- MA51 – from Commercial/Mixed Use to Industrial;
- MA52 – from Business and Enterprise to Commercial/Mixed Use;
- MA53 – from Industrial to Business & Technology;
- MA54 – from Outside Plan Boundary to Business & Technology;
- MA55 – from Open Space to Business and Enterprise; and
- MA56 – from Open Space to Business and Enterprise.

As part of this review, the planning authority is required to:

- (i) 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 the required infrastructure to the identified zoned lands at draft and final plan stages of the plan making process;
- (ii) provide an evidence-based rationale for the overall quantity and the spatial location of all employment generating land use zonings;
- (iii) consider all relevant infrastructural capacity in applying the tiered approach to zoning;
- (iv) provide an evidence-base to demonstrate the proposed zoning of the additional employment lands adhere to the requirements set out in section 2.6 and/or section 2.7 of the section 28 Ministerial Guidelines *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012);
- (v) omit any lands which cannot be justified under (i) to (iv) inclusive above;
- (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.

The planning authority's attention is also drawn to MA Recommendation 3 below (Flood Risk Management) in respect of proposed material amendments MA50, MA55 and MA56.

Chief Executive's Response:

- i. The contents of the submission are noted. The Chief Executive's Responses and Recommendation to the OPR submission (GLW-C42-49) is still relevant. Consultation and close collaboration with Uisce Éireann on the identification of employment lands took place as part of the preparation of the Draft Tuam LAP. The Planning Authority identified employment lands based on established uses and location of said lands. Consultation occurred with TII in relation to an appropriate policy objective in relation to access arrangements at Mountpotter. In addition, a Local Transport Plan was prepared with the Draft Local Area Plan.
- ii. See above.
- iii. See above.
- iv. See above.

- v. During the course of the Municipal District meeting, several motions were proposed by the Elected Members specifically relating to Material Alterations referenced above which were contrary to the Chief Executive advice and did not form part of the analysis of lands considered during the preparation of the Draft Tuam LAP. The Planning Authority concurs with the view of the OPR with regards to Material Alterations MA42, MA50, MA51, MA52, MA53, MA54, MA55 and MA56 and it is considered that these lands should revert as per the Draft Tuam LAP.
- vi. The measures included in the LTP and the new Policy Objective proposed on lands at Mountpotter is considered sufficient to address the concerns of the OPR. Where new development is proposed to take place on future zoned land in Tuam, 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 employment developments (including expansion of existing) in Tuam, 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 Tuam is developed into the future.

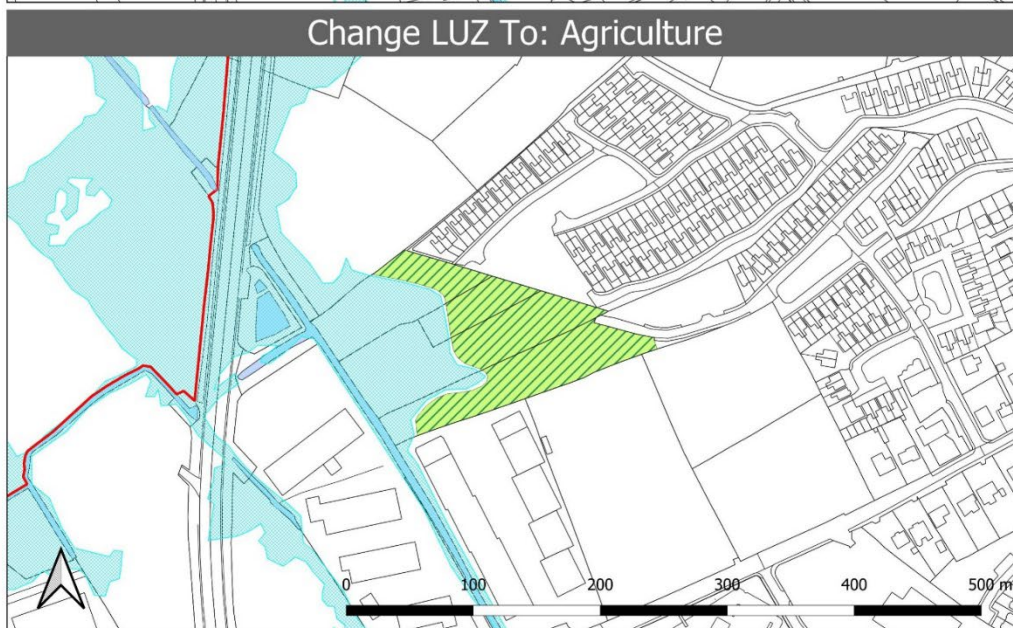
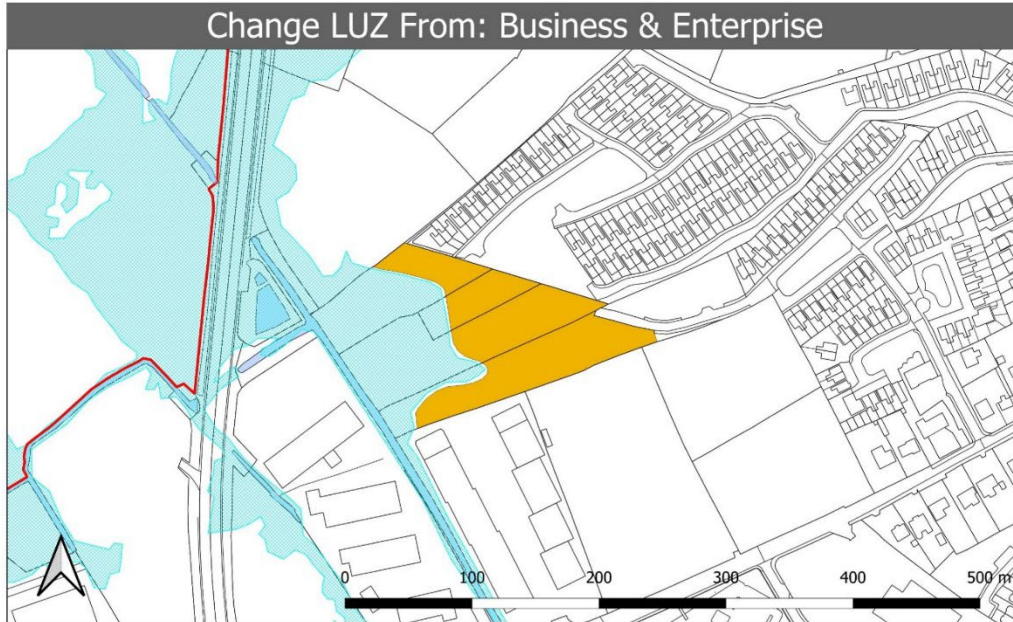
Chief Executive's Recommendation:

- i. No Change.
- ii. No Change.
- iii. No Change.
- iv. No Change.
- v. As per recommendation 2 – Land Zoned for Employment Uses, the following Material Alterations should revert as per the Draft Tuam LAP as follows:

MA42: Revert to the provisions of the Draft Tuam LAP where these lands were zoned Agriculture.

Lands Zoned for Employment Uses

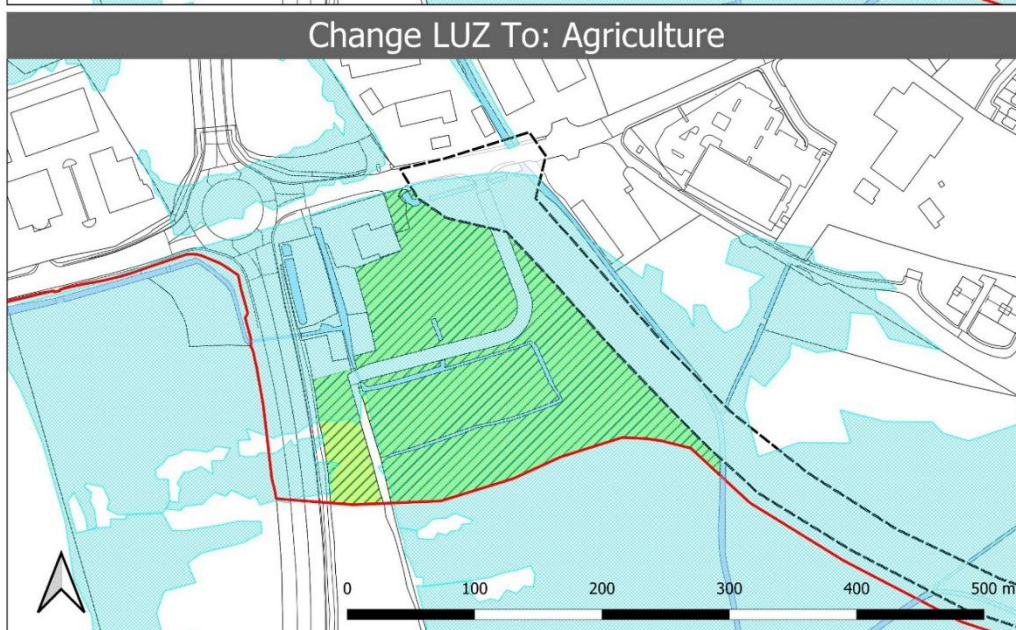
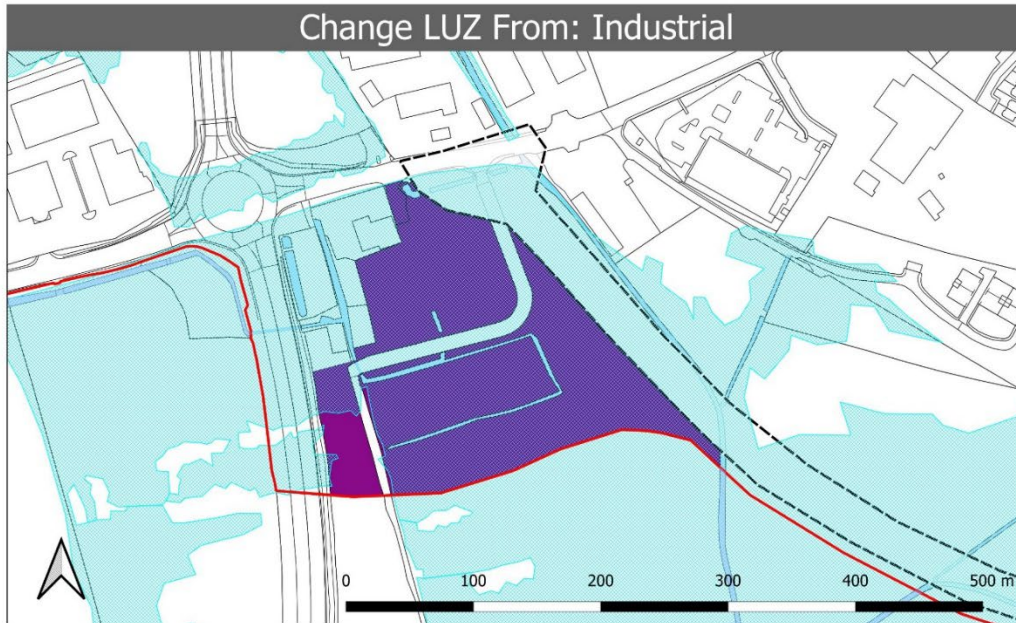
Material Alteration: MA42
Change Zoning From: Business & Enterprise
Change Zoning to: Agriculture
Area: 1.261 Ha.



MA50: Revert to the provisions of the Draft Tuam LAP where these lands were zoned Agriculture.

Lands Zoned for Employment Uses

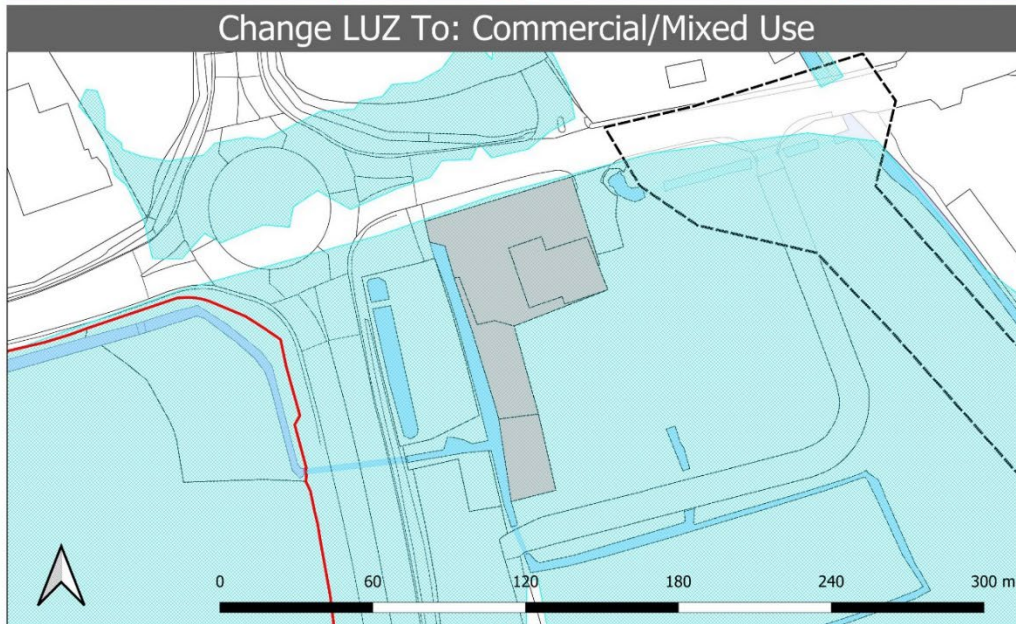
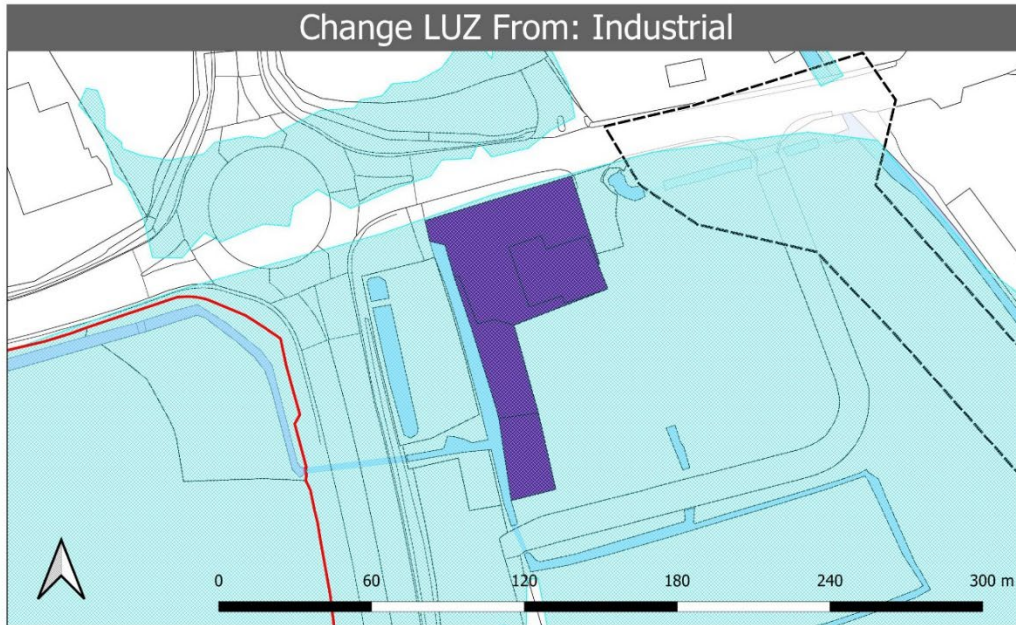
Material Alteration: MA50
Change Zoning From: Industrial
Change Zoning to: Agriculture
Area: 3.721 Ha.



MA51: Revert to the provisions of the Draft Tuam LAP where these lands were zoned Commercial/Mixed Use.

Lands Zoned for Employment Uses

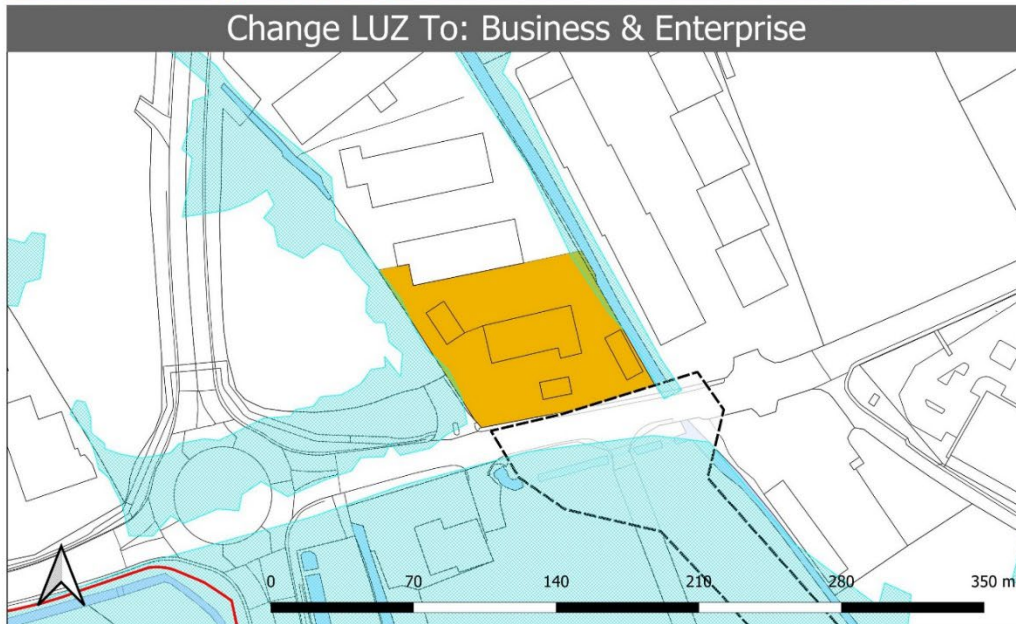
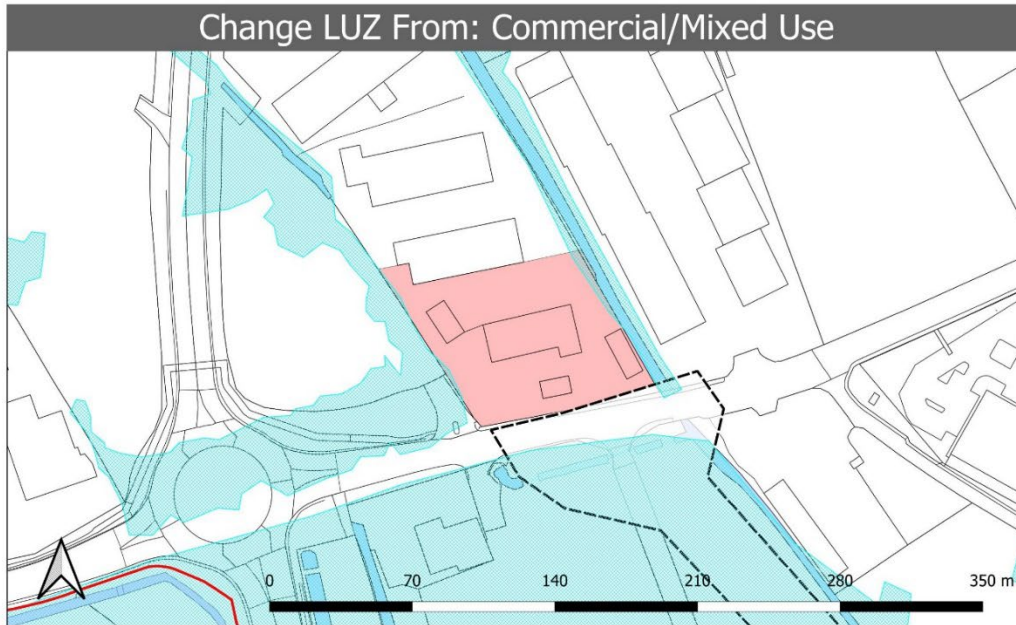
Material Alteration: MA51
Change Zoning From: Industrial
Change Zoning to: Commercial/Mixed Use
Area: 0.383 Ha.



MA52: Revert to the provisions of the Draft Tuam LAP where these lands were zoned Business and Enterprise.

Lands Zoned for Employment Uses

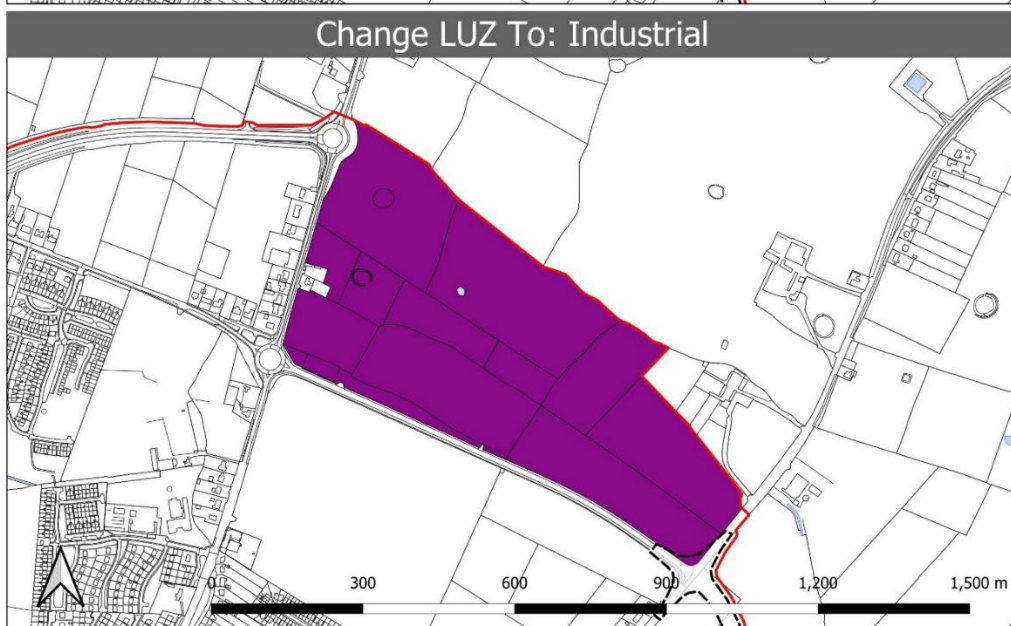
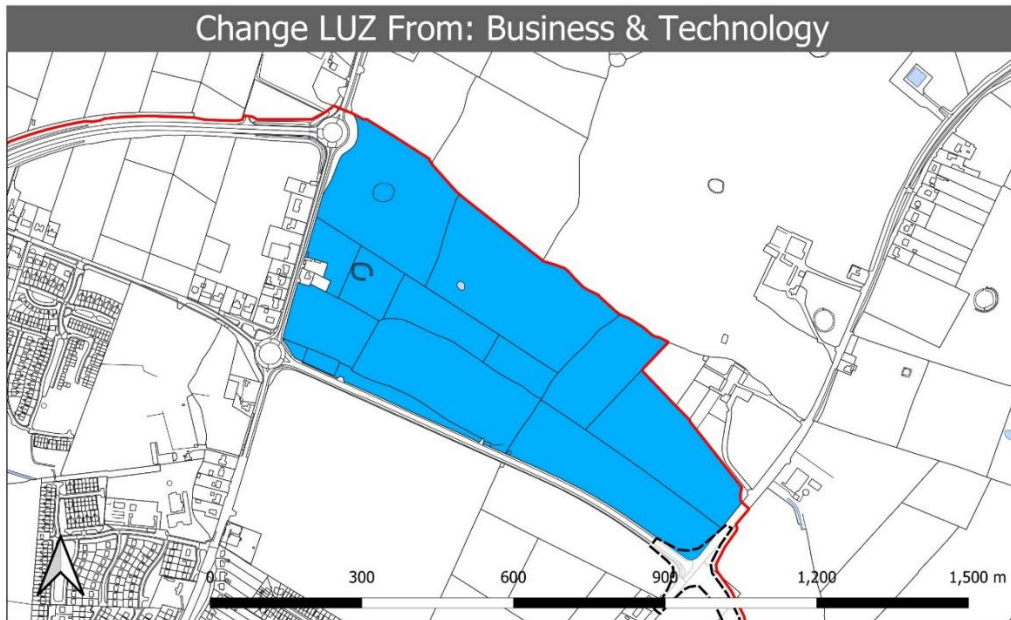
Material Alteration: MA52
Change Zoning From: Commercial/Mixed Use
Change Zoning to: Business & Enterprise
Area: 0.701 Ha.



MA53: Revert to the provisions of the Draft Tuam LAP where these lands were zoned Industrial.

Lands Zoned for Employment Uses

Material Alteration: MA53
Change Zoning From: Business & Technology
Change Zoning to: Industrial
Area: 34.454 Ha.



MA54: Revert to the provisions of the Draft Tuam LAP where these lands were not zoned.

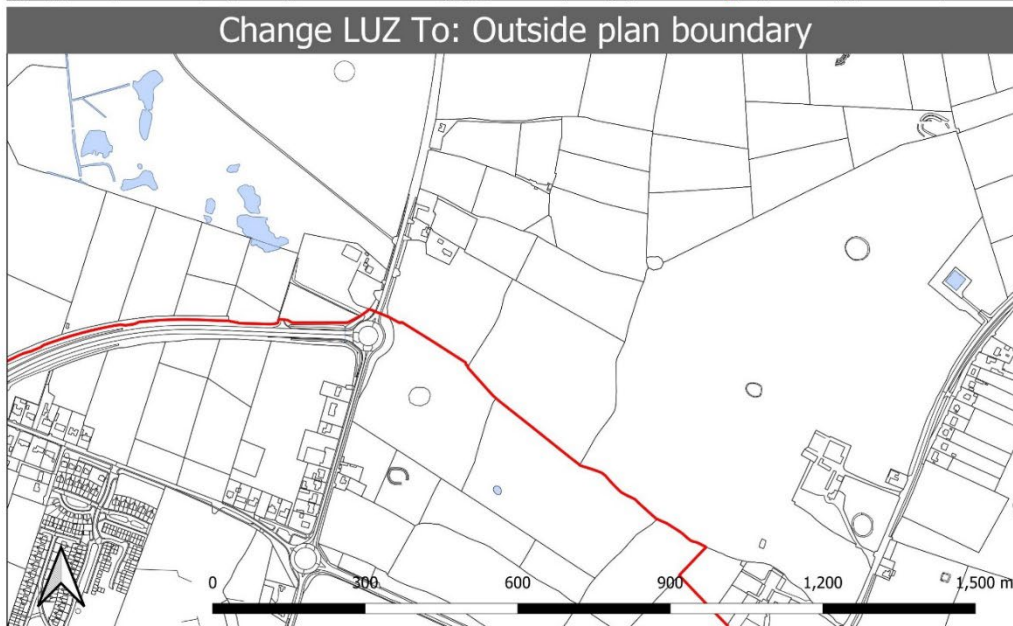
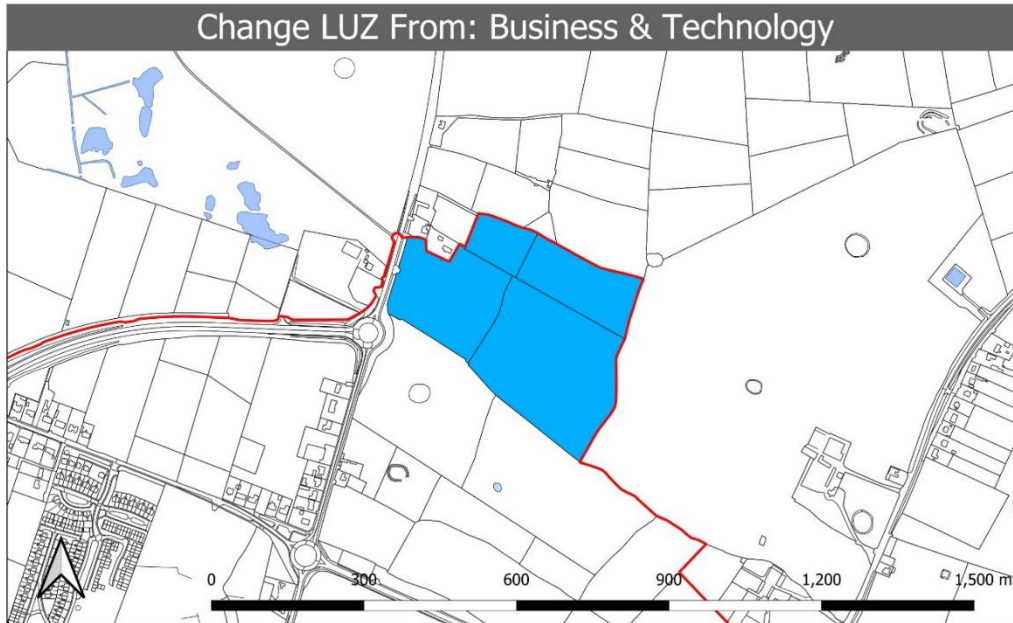
Lands Zoned for Employment Uses

Material Alteration: MA54

Change Zoning From: Business & Technology

Change Zoning to: Outside plan boundary

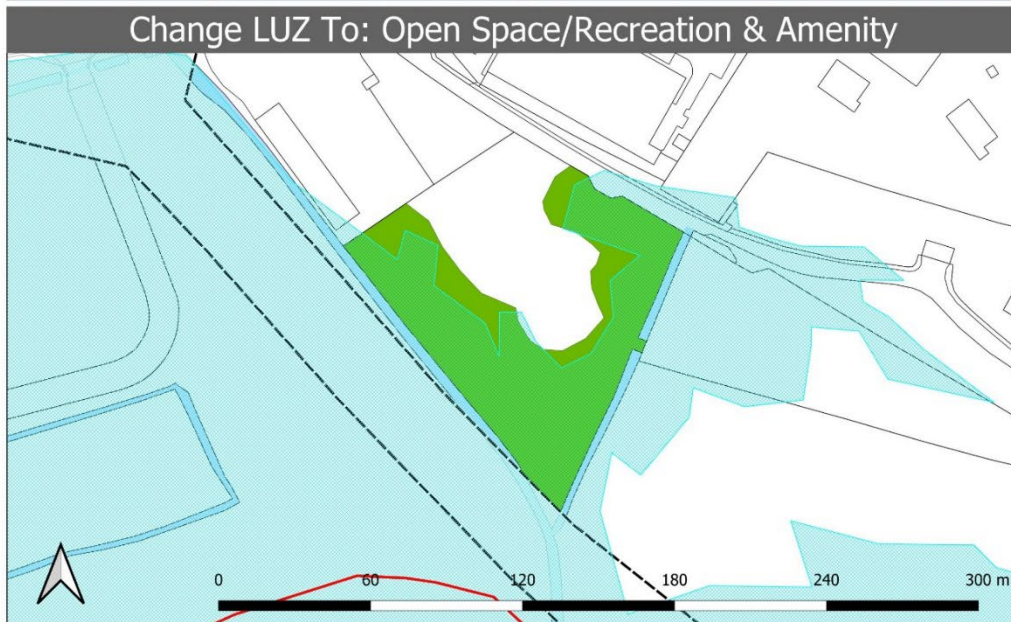
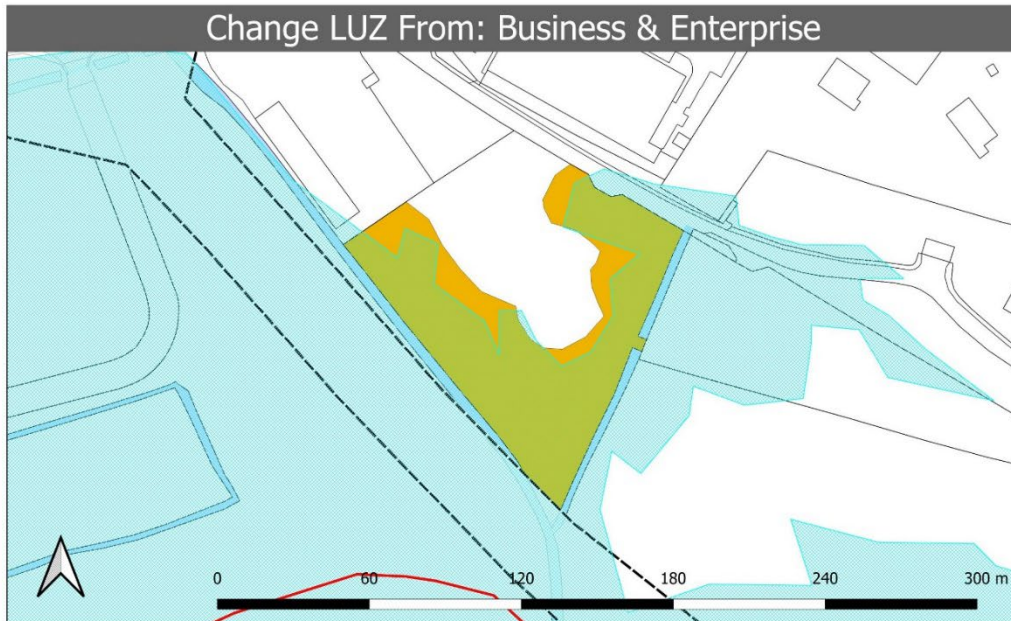
Area: 13.384 Ha.



MA55: Revert to the provisions of the Draft Tuam LAP where these lands were zoned Open Space/Recreation & Amenity.

Lands Zoned for Employment Uses

Material Alteration: MA55
Change Zoning From: Business & Enterprise
Change Zoning to: Open Space/Recreation & Amenity
Area: 0.674 Ha.



MA56: Revert to the provisions of the Draft Tuam LAP where these lands were zoned Open Space/Recreation & Amenity.

Lands Zoned for Employment Uses

Material Alteration: MA56
Change Zoning From: Business & Enterprise
Change Zoning to: Open Space/Recreation & Amenity
Area: 5.77 Ha.



vi. No Change.

4. Flood Risk Management

The Office notes the Flood Guidelines advise that lands within Flood Zone A or B should not be zoned for development/uses that are vulnerable or highly vulnerable, respectively, unless they follow the sequential approach and pass the plan-making Justification Test. It is considered that the planning authorities should overlay the extent of Flood Zones A and B on the land use zoning maps for greater transparency.

Concern is expressed regarding MA39, MA50, MA55 and MA56 which introduce employment zonings within Flood Zone B, and within area of greater risk of flooding in future scenarios. It is stated that this would not be consistent with NPO 57. The Office also notes that the amended SFRA concludes that these Material Alterations would result in an increase in flood risk, including to populations to human health and material assets. The SFRA also states that the proposed zonings 'would not be considered compatible to complying with the Flood Risk Management Guidelines'.

MA Recommendation 3 – Flood Risk Management

Having regard to NPO 57 of the NPF, and to the provisions of The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009), the planning authority is required to make the LAP without the following proposed material amendments:

- MA39 (Open Space/Recreation & Amenity to Business & Enterprise);
- MA50 (Agriculture to Industrial);
- MA55 (Open Space/Recreation & Amenity to Business & Enterprise); and
- MA56 (Open Space/Recreation & Amenity to Business & Enterprise).

Chief Executive's Response:

The contents of the submission are noted, and the Planning Authority concurs with the view of the OPR with regards to Material Alterations MA39, MA50, MA55 and MA56 and it is considered that the said Material Alterations are not compatible to complying with the Flood Risk Management Guidelines and therefore are not consistent with NPO 57.

Chief Executive's Recommendation:

MA39: Revert to the provisions of the Draft Tuam LAP where these lands were zoned Open Space/Recreation & Amenity.

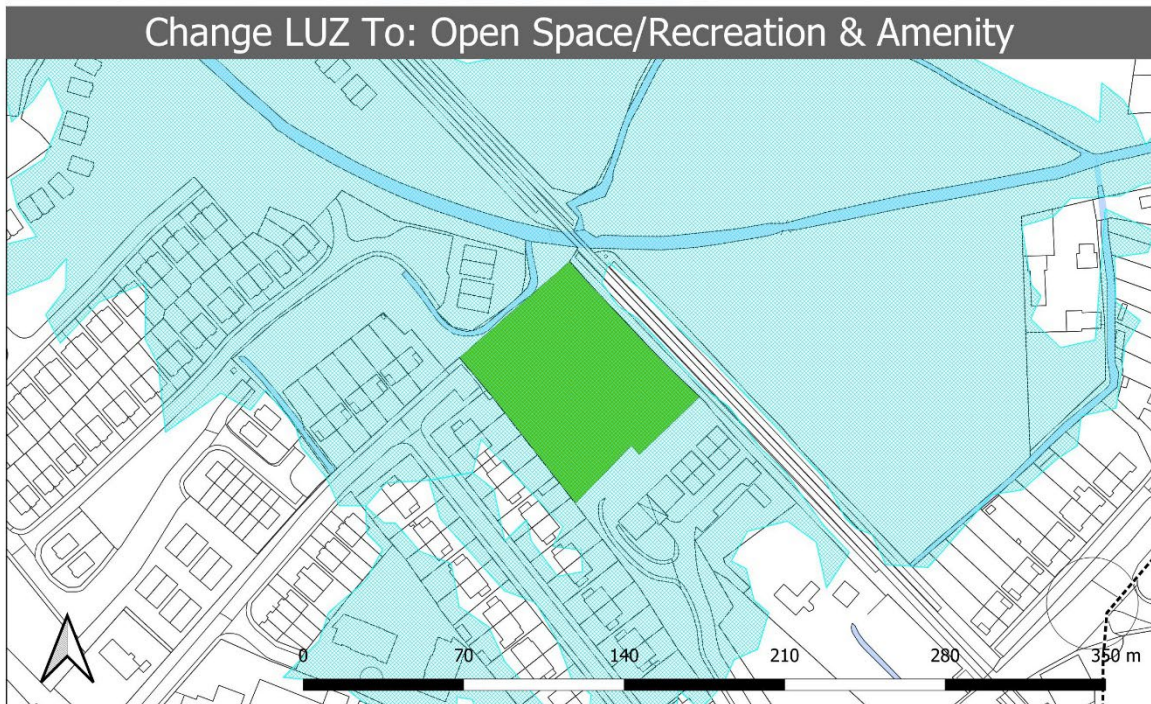
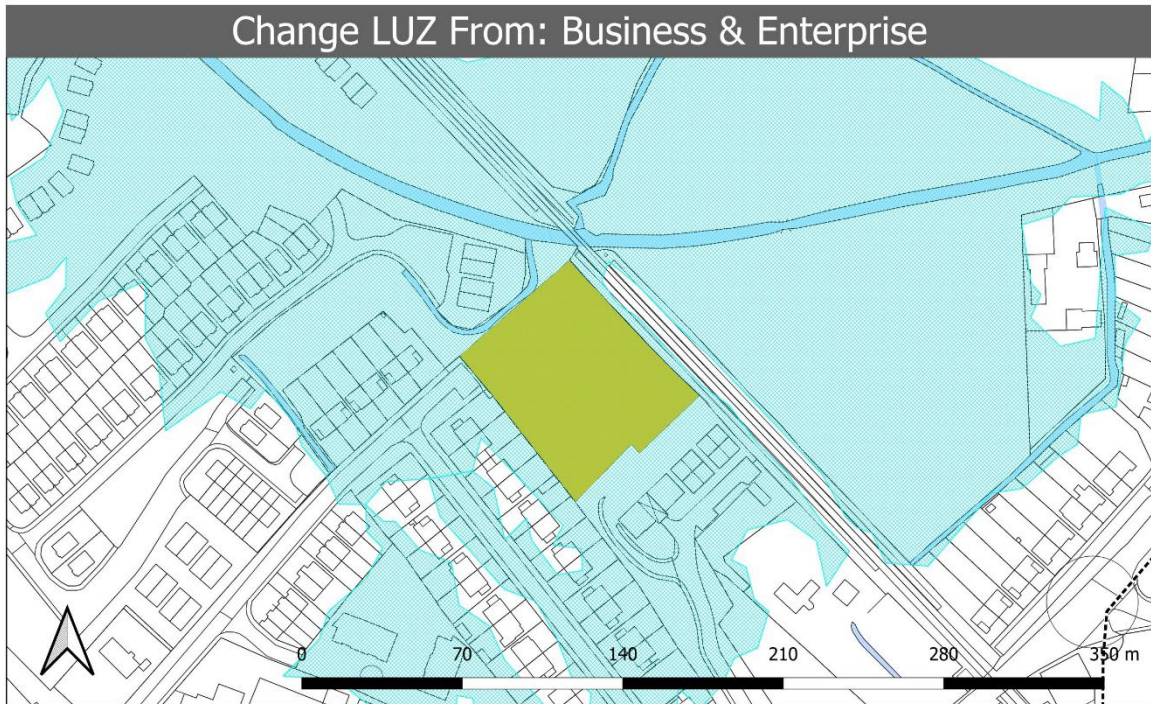
Flood Risk Management

Material Alteration: MA39

Change Zoning From: Business & Enterprise

Change Zoning to: Open Space/Recreation & Amenity

Area: 0.543 Ha.



MA50: See the Chief Executive's Recommendation to, MA Recommendation 2 - Land zoned for employment uses.

MA55: See the Chief Executive's Recommendation to, MA Recommendation 2 - Land zoned for employment uses.

MA56: See the Chief Executive's Recommendation to, MA Recommendation 2 - Land zoned for employment uses.

5. Implementation and Monitoring

The OPR welcomes MA5 and *Policy Objective TKT 63 Implementation and Monitoring* which provides monitoring of the core strategy. It is noted however that no other implementation and monitoring policy and objectives are included in the Draft Tuam LAP.

MA Observation 2 – Plan 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 requested to amend, by minor modification, proposed material amendments policy objective TKT 63 to commit to including more general plan implementation and monitoring.

Note: Chapter 10 of the *Development Plans, Guidelines for Planning Authorities (2022)* provides useful guidance in this regard.

Chief Executive's Response:

It is considered that the Draft Tuam LAP is consistent with local and national policy guidance. It supports the implementation of a monitoring programme. *Chapter 2 Core Strategy, Settlement Strategy and Housing Strategy* of the GCDP 2022 – 2028 contains a suite of policy objectives in relation to monitoring and adherence to national and regional Policy Objectives. Furthermore, the submission of received from the OPR (GLW-C42-49) on the Draft Tuam LAP a new policy objective, *TKT 63 Implementation and Monitoring* has been included as part of the Material Alteration (MA5) to support the Draft Tuam LAP. It is therefore not considered necessary to amend *Policy Objective TKT 63 Implementation and Monitoring*.

Chief Executive's Recommendation:

No Change.

Prescribed Authorities

Submission No.	Submission Name	Summary of Issues Raised in Submission	Chief Executive's Response
GLW-C62-10	NWRA (Northern and Western Regional Assembly)	<p>A comprehensive submission has been received by the NWRA.</p> <p>The submission notes the recommendations made on the Draft Tuam LAP submission which are considered in the proposed Material Alterations in particular:</p> <ul style="list-style-type: none"> • Recommendation 2 – Regeneration Masterplan become an integral part of the LAP; • Recommendation 4b – High level of Residential phase 2. <p>The NWRA welcomes a number of Material Alterations (MA) following recommendations from Prescribed Bodies specifically MA13 recommended by TII.</p> <p>It is noted that there have been extensive material alterations relating to land use zoning changes.</p> <p>The submission has made comments on the following Material Alterations which may have a regional significance:</p> <ul style="list-style-type: none"> • MA 32 	<p>Chief Executive's Response:The Council welcomes the submission received from the NWRA.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

		<p>It is stated that no rationale is given to the zoning change from Agriculture lands to Residential Phase 1 lands. It is also pointed out that these lands are located north to a flood zone.</p> <ul style="list-style-type: none"> • MA37, MA38, MA49 <p>It is requested that it would be informative if an infrastructure audit were provided to the zoning change from Residential Phase 2 to Residential Phase 1.</p> <ul style="list-style-type: none"> • MA40 <p>It is stated no justification is given for additional Residential Phase 2 lands and for the extension of the settlement boundary.</p> <ul style="list-style-type: none"> • MA 54 <p>It is queried as to the justification for the zoning of these additional Business and Technology lands and the subsequent extension of the settlement boundary to accommodate this Material Alteration. It is stated that there already is a significant amount of undeveloped Business and Technology lands. The access to these lands is unclear. It is specifically requested that the access does not interfere with the optimal use of the N17 as provided within RPO 6.5 of the RSES.</p> <ul style="list-style-type: none"> • MA60 	<p>Noted. See Chief Executive's Response to the OPR (GLW-C62-11) submission Recommendation 1 above.</p> <p>Noted. See Chief Executive's Response to the OPR (GLW-C62-11) submission Recommendation 1 in relation to MA38 and MA49. The land parcel (MA37) should be reverted as per MA38 as per the Draft Tuam LAP.</p> <p>Noted. See Chief Executive's Response to the OPR (GLW-C62-11) submission Recommendation 1 above.</p> <p>Noted. See Chief Executive's Response to the OPR (GLW-C62-11) submission Recommendation 2 above.</p>
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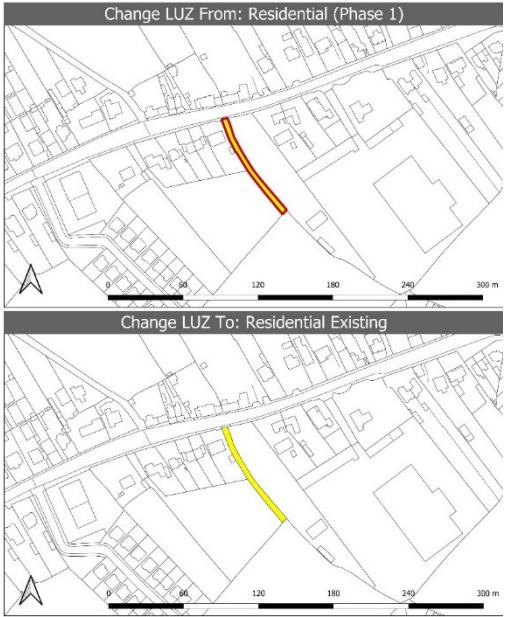
		<p>It is stated that there is no rationale given to extend the settlement boundary. This Material Alteration is not consistent with the RSES in terms of compact development and prioritisation of serviced land.</p> <p>MA9 MA38, MA39, MA49, MA50, MA51, MA55, MA56 Concern is expressed regarding these Material Alterations and the increase of probability of development in areas at greater risk of flooding which would not be consistent with the RSES.</p> <p>MA 50, 51 It is noted that these two Material Alterations may compromise the strategic capacity of the national roads network, contrary to RPO 6.5 of the RSES.</p> <p>In conclusion, the submission consider that the majority of Material Alterations do not create any consistency issues with the RSES. It is recommended that any inconsistency would not be accepted by the Council.</p> <p>It is noted there is no justification regarding Land use zoning changes, particularly the large increase of Business and Technology and Business and Enterprise lands. These would not be consistent with compact development or relate to the Jobs to Population Growth ratio espoused in the NPF and the RSES.</p>	<p>Noted. The Planning Authority concurs with the view of the NWRA in relation to the extension of the settlement boundary. See OPR (GLW-C62-11) Recommendations on the Material Alterations that have resulted on boundary extension.</p> <p>Noted. See Chief Executive's Responses to the OPR (GLW-C62-11) submission Recommendation 1, Recommendation 2 and the OPW (GLW-C62-7) submission.</p> <p>Noted. See Chief Executive's Response to the OPR (GLW-C62-11) submission Recommendation 2 above.</p> <p>Noted. See Chief Executive's Response to the OPR (GLW-C62-11) submission in relation to matters raised.</p> <p>Noted.</p>
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The submission also notes the increase of Residential Phase 1 lands would raise similar concerns and is contrary to the core strategy. The Assembly cannot conclude that these are consistent with the RSES.

Noted. The Planning Authority concurs with the view of the NWRA.

Chief Executive's Recommendation:

- See Chief Executive's Recommendation to the OPR (GLW-C62-11) submission on the following Material Alterations; MA32, MA38, MA49, MA40, MA54, MA39, MA50, MA51, MA55, MA56.
- See Chief Executive's Recommendation to the OPW (GLW-C62-7) submission for MA9.
- **MA37:** Revert to the provisions of the Draft Tuam LAP where these lands were zoned Residential Existing.



			<ul style="list-style-type: none"> • MA60: Amendment of map Illustrating Settlement Boundary as a result of recommendations of individual Material Alterations (changed consequent). • MA13: Erratum: Amendment of MA13 as follows: Policy Objective TL7 – TKT 64 Noise <p>Require all new proposed development, which is considered to be noise sensitive within 300m of existing, new or planned national roads, or roadways with traffic volumes greater than 8,220 Annual Average Daily Traffic (AADT), to include a noise assessment and mitigation measures if necessary with their planning application documentation. The cost of mitigation measures shall be borne by the developer. Mitigation measures in order to protect the noise environment of Residential Existing development will be facilitated or enforced as necessary.</p>
GLW-C62-9	Dept of Housing, Local Government and Heritage	<p>The Department has raised a number of points in their submission.</p> <p><u>Nature Conservation</u></p> <p>The submission notes Material Alterations MA32, MA39, MA42, MA55 and MA56 propose Land Use Zoning Change but no assessment of the environmental effects is given.</p>	<p>Chief Executive’s Response:</p> <p>The Council welcomes the submission received from the Department.</p> <p>Noted. Please refer to the Strategic Environmental Assessment (SEA) and Screening for Appropriate Assessment (AA) documentation that accompanied the Proposed Material Alterations on display and the SEA Environmental Report and AA Natura Impact Report that accompanied the Draft Tuam LAP on display. All Proposed</p>

		<p>It is stated in relation to biodiversity that no consideration is provided whether the land use zoning change and any future development would be consistent with objectives and policies of the GCDP 2022 – 2028.</p> <p>The Department suggests that information about the present natural habitats and wetlands should be available to inform the change in land use zoning, to examine whether the change is consistent with Galway County Council policies and objectives for natural heritage and biodiversity, and to assist in devising any plan-level mitigation or necessary measures.</p> <p>The submission notes that the plan area incorporates parts of the European site, Lough Corrib Special Area of Conservation (SAC) and there is direct hydrological connectivity between the plan area and Annex I lake habitats within the SAC where conservation objectives are to restore their favourable conservation condition within the site.</p> <p><u>Archaeology</u></p>	<p>Material Alterations have been considered, as required, as part of the SEA and AA processes being undertaken alongside the preparation and adoption of the Plan. No change required to SEA or AA documentation on foot of this submission.</p> <p>The GCDP 2022 – 2028 contains a suite of policy objectives which support the provision of biodiversity, natural and archaeological heritage. Therefore, it is not considered pertinent to duplicate such references in the Draft Tuam LAP.</p> <p>Noted.</p> <p>Noted.</p>
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		<p>MA40 It is considered that the proposed lands for zoning change incorporate a plot that is adjacent to a Recorded Monument and the boundary of it may not represent the full extent of the site. Thus, it is stated there is a potential for disturbing human remains during any proposed works associated with residential development of the area.</p> <p>MA41 The Department welcomes the inclusion of the Recorded Monument within the settlement boundary and the proposed zoning change. It is noted this will increase public awareness and appreciation of the site and may assist with future conservation of the site.</p> <p>MA53, MA54, MA58 The submission considers that the lands incorporate multiple Recorded Monuments which are subject to statutory protection.</p> <p>MA57 It is noted that the lands are adjacent to multiple Recorded Monuments which may have a sub-surface expression that extends within the proposed development lands.</p> <p>The submission suggests that Section 3.4 of the <i>Framework and Principles for the Protection of the Archaeological Heritage</i> must be considered in development proposals (and overarching Land Use Zoning proposals).</p>	<p>Noted. See Chief Executive's Response to the OPR (GLW-C62-11) submission Recommendation 1 above.</p> <p>Noted.</p> <p>Noted. See Chief Executive's Response to the OPR (GLW-C62-11) submission Recommendation 1 and Recommendation 2 above.</p> <p>Noted.</p> <p>Noted.</p>
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		<p>The Department requests to take cognisance of the location of recorded archaeological sites and monuments when proposing Land Use Zoning changes and ensure that there are compatible with national policies.</p> <p>It is additionally noted when proposing of Land Use Zoning changes that potential impacts of developments to the setting and amenity of Recorded Monuments should be considered. Furthermore, it is requested that appropriate methods of assessments, visual impact assessments and non-intrusive survey should be employed.</p>	<p>Noted.</p> <p>Noted. The GCDP 2022 – 2028 contains a suite of policy objectives which support the architectural and archaeological heritage. Therefore, it is not considered pertinent to duplicate such references in the Draft Tuam LAP.</p> <p>Chief Executive’s Recommendation See Chief Executive’s Recommendation to the OPW (GLW-C62-7) submission for MA9 and the amendment of the General Notes on Land Use Zoning Matrix.</p> <p>See Chief Executive’s Recommendation to the OPR (GLW-C62-11) submission on the following Material Alterations; MA39, MA40, MA50, MA51, MA53, MA54, MA55, MA56 and MA58.</p>
GLW-C62-2	Environmental Protection Agency (EPA)	<p>The Environmental Protection Agency (EPA) has raised several points in their submission.</p> <p>Proposed SEA Determination</p>	<p>Chief Executive’s Response: The Council welcomes the submission received from the EPA. The SEA process will consider these issues and ensure all requirements are met until and following the adoption of the Plan.</p>

		<p>The EPA notes the proposed determination regarding the need for SEA of the Material Alterations (MA).</p> <p>The submission observes their '<i>SEA of Local Authority Land Use Plans – EPA Recommendations and Resources</i>' guidance sets out key recommendations for integrating environmental consideration into Local Authority land-use plans. The guidance should be considered as appropriate and relevant to the Material Alterations.</p> <p>Sustainable Development</p> <p>The EPA notes the Material Alterations should be consistent with proper planning and sustainable development. Adequate and appropriate critical service infrastructure should be put in place or required to be put in place, to service any development proposed and authorised during the lifetime of the LAP.</p> <p>It is also noted the MA needs to align with national commitments on climate change mitigation and adaptation, as well as incorporating any relevant recommendations in sectoral, regional and local climate adaptation plans.</p> <p>The submission further notes that the Draft Tuam LAP should be consistent with key relevant higher-level plans and programmes.</p> <p>Specific Comments to be considered</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
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		<p>The EPA outlines key aspects below to be taken into account in preparing Material Alterations.</p> <p>Clear justification should be given when proceeding with Material Alterations having likely significant environmental effects or which conflict with national environmental or planning policy.</p> <p>The Draft Tuam LAP should also consider and integrate recommendation of the SEA prior to its adoption.</p> <p>Future Modifications to the Draft Plan</p> <p>The submission notes further changes to the Draft Tuam LAP should be screened for likely significant effect in accordance with SEA Regulations and should be assessed as the “environmental assessment” of the Draft Tuam LAP.</p> <p>SEA Statement – “Information on the Decision”</p> <p>The EPA suggests once the Final LAP is adopted to prepare an SEA Statement that summarises the following:</p> <ul style="list-style-type: none"> • How environmental considerations have been integrated into the LAP; • How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the LAP; • The reasons for choosing the LAP adopted in the light of other reasonable alternatives dealt with; and, • The measures decided upon to monitor the significant environmental effects of implementation of the LAP. 	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
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		<p>The submission notes a copy of the SEA Statement should be sent to any environmental authority consulted during the SEA process and suggests their guidance on preparing SEA Statements.</p> <p>Environmental Authorities</p> <p>The EPA observes under the SEA Regulations, the following authorities should be consulted:</p> <ul style="list-style-type: none"> • Environmental Protection Agency; • Minister for Housing, Local Government and Heritage; • Minister for Environment, Climate and Communications; and • Minister for Agriculture, Food and the Marine. • any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan. 	<p>Noted.</p> <p>Chief Executive’s Recommendation: No Change.</p>
GLW-C62-3	Transport Infrastructure Ireland (TII)	<p>Transport Infrastructure Ireland (TII) has raised several points in their submission.</p> <p>1. Proposed Material Amendments in the Vicinity of N17/N83 (Mountpotter)</p> <p>TII welcomes the proposed MA10 which addresses the requirement for a co-ordinated access strategy to the designated Business and Technology lands at Mountpotter.</p>	<p>Chief Executive’s Response: Submission noted.</p> <p>Noted.</p>

		<p>TII notes MA53 and MA54 and the land use zoning change from Industrial to Business and Technology.</p> <p>It is requested that MA54 should be reviewed by the Council prior to its incorporation to the Draft Tuam LAP to ensure conformance with:</p> <ul style="list-style-type: none"> • Government policy included in the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012); • Official policy provisions included in NPO 74/NSO 1 and NSO 2, RPO 6.5 and RPO 6.28. <p>It is also noted that the amended Draft Local Transport Plan (LTP) does not appear to include these proposed extended employment zoning in Figure 24 (page 59). This indicates a lack of coordination between the proposed additional zoning designation and the Draft LTP.</p> <p>2. Proposed Material Alterations in the Vicinity of M17/N17/N83/R942</p> <p>TII notes a number of proposed Material Alterations and land use zoning changes in the vicinity of M17 Junction 20 comprising MA42, MA50, MA 51, MA52, MA55, MA56.</p> <p>The submission requests that MA42, MA50, MA51 and MA52 should be reviewed by the Council prior to its</p>	<p>Noted.</p> <p>Noted. See Chief Executive’s Response to the OPR (GLW-C62-11) submission Recommendation 2 above.</p> <p>Noted. See Chief Executive’s Response to the OPR (GLW-C62-11) submission Recommendation 2 above. Please note, the motions proposed by Municipal District Members did not form part of the Chief Executive’s Recommendation to amend the Draft Tuam LAP. Therefore, the additional Material Alterations did not form part of the LTP.</p> <p>Noted. See Chief Executive’s Response to the OPR (GLW-C62-11) submission Recommendation 2 above.</p> <p>Noted. See Chief Executive’s Response to the OPR (GLW-C62-11) submission Recommendation 2 above.</p>
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		<p>incorporation to the Draft Tuam LAP to ensure conformance with:</p> <ul style="list-style-type: none"> • Government policy included in the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012); • Official policy provisions included in NPO 74/NSO 1 and NSO 2, RPO 6.5 and RPO 6.28. <p>It is noted that the amended Draft LTP does not appear to include these proposed extended employment zoning in Figure 24 (page 59).</p> <p>3. Proposed Material Alteration no.13</p> <p>TII welcomes the proposed Material Alteration which addresses a requirement for noise sensitive uses in the vicinity of an existing, new or planned national road to include a noise assessment and, where necessary, noise mitigation measures.</p> <p>It is requested however to review the land use zoning change associated with MA58 to ensure conformance with official policy provisions included in NPO 74/NSO 2 and RPO 6.5.</p>	<p>Noted. See Chief Executive’s Response to the OPR (GLW-C62-11) submission above. Please note, the motions proposed by Municipal District Members did not form part of the Chief Executive’s Recommendation to amend the Draft Tuam LAP. Therefore, the additional Material Alterations did not form part of the LTP.</p> <p>Noted.</p> <p>Noted. See Chief Executive’s Response to the OPR (GLW-C62-11) submission Recommendation 1 above.</p>
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		<p>TII requests to conclude that the foregoing observations are taken into consideration prior to the adoption of the Draft LAP. The submission notes it is in the interests of giving effect to the objective to maintain the strategic capacity and safety of the national road network included in the National Planning Framework (NPF) and the National Development Plan (NDP), the Northern and Western Regional Assembly, the Regional Spatial and Economic Strategy, the National Investment Framework for Transport in Ireland (NIFTI) and the National Sustainable Mobility Policy as well as existing Statutory Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).</p>	<p>Noted.</p> <p>Chief Executive's Recommendation: See Chief Executive's Recommendation to the OPR (GLW-C62-11) submission on the following Material Alterations; MA53, MA 54, MA42, MA50, MA 51, MA52, MA55, MA56.</p>
GLW-C62-6	National Transport Authority (NTA)	<p>The NTA welcomes the opportunity to comment on the Draft LAP and Draft LTP and have raised the following observations and recommendations:</p> <p>1. Policy Context</p> <p>The submission notes they have based these observations on the Draft LAP and Draft LTP dated on the 22nd March 2023 and the following policy and guidance documentation:</p> <ul style="list-style-type: none"> • National Investment Framework for Transport in Ireland (NIFTI); • National Sustainable Mobility Policy; • Climate Action Plan 2023; • National Planning Framework (NPF); 	<p>Chief Executive's Response: The Council welcomes the submission received from the NTA.</p> <p>Noted.</p>

		<ul style="list-style-type: none"> Northern and Western Regional Assembly – Regional Spatial and Economic Strategy (RSES). <p>2. Support for Material Alterations</p> <p>The NTA supports the following Material Alterations to the Draft LAP which serve to further support compact development and sustainable transport as well as protecting strategic transport infrastructure:</p> <ul style="list-style-type: none"> MA2 for the inclusion of <i>Policy Objective TKT 60 Strategic Sites in Tuam</i>; MA 10 and the inclusion of <i>Policy Objective TKT 12 (b) Business and Technology</i>; MA 13 to include ‘cycle parking’ under <i>Policy Objective TKT 33 Sustainable Transportation</i>; MA 15 to include reference to the NTA Permeability Best Practice Guide under <i>Policy Objective TKT 34 Pedestrian and Cycle Network</i>. <p>The submission also supports the following proposed amendments in the Draft LTP:</p> <ul style="list-style-type: none"> The inclusion of a commitment for further investigation and consultation with the NTA in relation to the specific nature of the improvements to the bus stops and to the proposed transport hub (Section 7.4); The inclusion of a commitment that ‘<i>A Parking Management Strategy will be developed, which will further consider the capacity and social and</i> 	<p>Noted.</p> <p>Noted.</p>
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		<p><i>economic cost of parking in Tuam long-term.'</i> (Section 7.5);</p> <p>It is requested that the commitment above included in Section 7.5 of the Draft LTP is also included in the Draft LAP.</p> <p>3. Observations on Specific Material Amendments</p> <p>MA32:</p> <p>The NTA requests to not accept the proposed Material Alteration 32. It is noted the land use zoning change to Residential Phase 1 is not appropriate with its location. There should be appropriate level of access to public transport and walking and cycling networks so that such developments would not be largely car dependent.</p> <p>MA42, MA50, MA51, MA53, MA54, MA55 and MA56:</p> <p>The submission requests the following:</p> <ul style="list-style-type: none"> • In finalising the Draft LAP and the Draft LTP, the plans should clearly set out the proposed transport networks and access arrangements to serve the Business & Technology zoned lands to the north of Tuam in their entirety; • As noted in their submission (GLW-C42-37) to the Draft Tuam LAP, the LAP should state that development in this area should be contingent on the provision of sustainable transport networks and should be designated to ensure accessibility 	<p>Noted. There are a number of policies and objectives in the LAP that supports the measures outlined in the LTP and as such it is considered that this is sufficient.</p> <p>Noted. See Chief Executive's Response to the OPR (GLW-C62-11) submission Recommendation 1 above.</p> <p>Noted. See Chief Executive's Response to the OPR (GLW-C62-11) submission regarding the Material Alterations referenced.</p> <p>As noted in the Draft Tuam LAP Chief Executive's Report, the Plan was amended to address the points raised. It was also noted that a specific policy objective was formulated in relation to access arrangements on lands zoned Industrial at Mountpotter.</p>
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		<p>and permeability by walking and cycling in line with RPO 6.31 of the RSES;</p> <ul style="list-style-type: none"> The zoning of the lands concerned should be in accordance with the principles included in Section 2.5 of the DoECLG Spatial Planning and National Roads Guidelines. <p>4. Suggested Material Amendments</p> <p>The NTA requests the following observations and recommendations made in the Draft Tuam LAP submission to consider the following:</p> <ul style="list-style-type: none"> The exemptions to allow for the development of Phase 2 lands should be conditional on the appropriate level of access to public transport and walking and cycling networks so that such developments would not be largely car dependent; Amend <i>Policy Objective TKT 9 Town Centre Management</i> to reflect that the Draft LAP should build on the findings of the Draft LTP and demonstrate consistency with its objectives. <p>5. Conclusion</p>	<p>However, an Elected Member’s motion rezoned the lands from Industrial to Business and Technology. Additional lands were also proposed by the Elected Members which increased the quantum of Business and Technology lands which also extended the settlement boundary. See Chief Executive’s Response (GLW-C62-11) to the OPR submission Recommendation 2.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted. <i>Policy Objective TKT 33 Sustainable Transportation</i> has been amended and it is considered that no further amendments are required.</p>
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		<p>The NTA trusts their views will be taken into consideration in the finalisation of the Draft LAP and Draft LTP and they would be available to discuss issues arising from the comments made.</p>	<p>Noted.</p> <p>Chief Executive's Recommendation: See Chief Executive's Response to the OPR (GLW-C62-11) submission Recommendation 1 above.</p>
GLW-C62-8	Uisce Éireann	<p>A detailed submission was received from Uisce Éireann. There is agreement with the inclusion of proposed Material Alteration arising from the consideration of the initial submission (GLW-C42-47) on the Draft Tuam LAP.</p> <p>Material Alterations amending Land Use Zonings: Available network information indicates short network extensions maybe required to service zoned lands. Depending on the extent of development realised, localised network upgrades may also be required particularly in areas served by 150mm or watermains with a diameter of 80mm or less.</p> <p>Overall, there is an increase in the amount of residential lands zoned, including Residential Phase 1 lands. It is stated that the need for this level of zoned land is unclear, a more focussed approach would assist in the planning for future infrastructure needs.</p>	<p>Chief Executive's Response: The contents of the submission are welcomed and noted. Galway County Council will continue to engage with Uisce Éireann on all matters relating to the plan making process and with relevant planning applications as necessary.</p> <p>Noted.</p> <p>Noted. The Planning Authority concurs with the view of Uisce Éireann.</p>

		<p>It is stated that several phase 1 lands have increased in size significantly increasing the likelihood that strategic upgrades will be required if developed fully.</p> <p>It is considered that sequential phased development is recommended to optimize existing infrastructure and minimize investment required.</p> <p>Additional site-specific comments are provided below:</p> <ul style="list-style-type: none"> • MA 29 300mm diameter sewer and critical trunk watermain transverses through the site. It is stated that these assets must be protected/diverted. Site layout should account of the existing sewer location; • MA 30 Available GIS indicates that the site unserved by sewer, an extension of 400m to 700m may be required to connect to the network which is suggested that this may not be feasible for small scale development; • MA 32 A stream crossing and/or localised upgrades maybe required; • MA36 Connect via private watermain, subject to agreement. Alternatively, extension of approx. 340m required to 	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted. See Chief Executive's Response to the OPR (GLW-C62-11) submission Recommendation 1 above.</p> <p>Noted.</p>
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		<p>watermain on Barrack Street. It is stated that the closest public sewer is approx. 440m away on Barrack Street;</p> <ul style="list-style-type: none"> • MA38 Sewer and watermain available on Galway Road, localised upgrades maybe required; • MA40 Sewer extension is required; • MA49 225mm sewer crosses the site, while a critical trunk may pass along the southern perimeter. Site layout should take account of those assets and provision is made to protect/divert these assets; • MA 50, MA51 and MA52 available GIS indicates a stream crossing and extension maybe required to connect to the newest sewer; • MA54 Long extension and national road crossing required to connect to the nearest sewer 500m away, network upgrades maybe required. Sequential phased development should be considered, connection requirements maybe less onerous with adjacent Business and Technology (MA53) 	<p>Noted. See Chief Executive's Response to the OPR (GLW-C62-11) submission Recommendation 1 above.</p> <p>Noted. See Chief Executive's Response to the OPR (GLW-C62-11) submission Recommendation 1 above.</p> <p>Noted. See Chief Executive's Response to the OPR (GLW-C62-11) submission Recommendation 1 above.</p> <p>Noted. See Chief Executive's Response to the OPR (GLW-C62-11) submission Recommendation 2 above.</p> <p>Noted. See Chief Executive's Response to the OPR (GLW-C62-11) submission recommendation 2 above.</p>
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		<p>site is developed. A critical trunk main passes along eastern perimeter of site;</p> <ul style="list-style-type: none"> • Industrial, Commercial, Business and Technology lands-depending on the extent of development realised, upgrades maybe required • Several sites are within/adjacent to flood zones eg MA45, MA32, MA50, MA51, MA56. Development on sites at risk of flooding may increase the level of complexity and in turn costs servicing these sites. <p>MA59 It is referenced that one of the sites included in this proposal relates to changes of multiple sites from Agriculture to Open Space and Recreation Amenity is within 100m of the Tuam Watewater treatment plant (WWTP). It is requested that the potential operational impacts for existing wastewater treatment facilities should be considered when assessing planning applications for the development of sensitive receptors in the vicinity of WWTPs. It is referenced that <i>Policy Objective TKT 17 Public Utilities</i> is applicable in this instance.</p> <p>Environmental Reports It is requested that that the contents of this submission should be taken into account in the Environmental Reports.</p>	<p>Noted.</p> <p>Noted. Lands relating to MA45 are not identified as Flood Zone A and B as per stage 2 Flood Risk Assessment. See Chief Executive’s Response to the OPR (GLW-C62-11) submission on Material Alteration MA32, MA50, MA51 and MA56.</p> <p>Noted.</p> <p>The contents of the submission have been considered in the context of the SEA and there are no issues or implications pertaining to the SEA.</p>
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			<p>Chief Executive’s Recommendation: See Chief Executive’s Response to the OPR (GLW-C62-11) submission for the related Material Alterations.</p>
GLW-C62-7	Office of Public Works (OPW)	<p>The OPW as lead agency for flood risk management in Ireland welcomes the opportunity to comment on the proposed Material Alterations of the Draft Tuam LAP.</p> <p>The submission welcomes the following Material Alterations:</p> <ul style="list-style-type: none"> • MA4 which add <i>Policy objective TKT 61 Active Land Management in Tuam</i> “ensuring development proposals demonstrate sustainable design principles including SuDS measures: • MA59; rezoning lands within the settlement boundary from Agriculture to Open Space/Recreation & Amenity; • MA61 removing PFRA Pluvial Mapping. <p>Flood Zone Mapping, the Sequential Approach and Constrained Land Use Zoning.</p> <p>The OPW requests in relation to MA7 to amend <i>Policy Objective TKT41 Constrained Land Use</i> and requires that all new development is limited to water compatible in Flood Zone A and less vulnerable or water compatible in Flood Zone B, and that to facilitate this, Flood Zone A and B mapping should be included overlaid on the Land Use Zoning Mapping in addition to Constrained Land Use Zoning Mapping.</p>	<p>Chief Executive’s Response:</p> <p>Noted.</p> <p>Noted. The requested wording amendment in relation to MA7 and <i>Policy Objective TKT 41 Constrained Land Use</i> would not be in compliance with the Flood Risk Management Guidelines. The requested amendment would not allow for instances where the Justification Test has been passed - therefore it is not considered appropriate to accommodate the wording as requested. However, as part of the publication of the Plan, the land use zoning map will identify Constrained Land Use (Zone A</p>

		<p>Errata</p> <p>The submission requests in relation to MA8 to amend <i>Policy Objective TKT52 Flood Risk Management</i> to reflect that the Climate Change Sectoral Adaptation Plan was produced by the OPW.</p> <p><u>Preliminary Flood Risk Assessment (PFRA)</u></p> <p>The OPW states while the superseded PFRA layer was removed from the Flood Risk Management Map, the superseded PFRA datasets are still listed on the Table 3 – Predictive Flood Risk Indicators.</p> <p><u>(SuDS) and Nature-based Solutions</u></p> <p>The submission outlines in the Draft Tuam LAP submission that the Guidelines reference recommendations regarding guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites, and the identification of where integrated and area based provision of SuDS and green infrastructure are appropriate.</p> <p>The OPW welcomes that the updated SFRA have referenced these recommendations.</p> <p>However, it is noted that the recommendations have been included in a generalised manner. There has been no identification of specific areas where integrated or area</p>	<p>and Zone B) in greater transparency and detail for the end user to clearly see the flood zones.</p> <p>Noted. MA8 will be modified to correct this error.</p> <p>Noted. References to PFRA mapping from Table 3 in the SFRA will be removed.</p> <p>Noted. The SFRA provides an appropriate level of guidance in relation to SuDS that is commensurate with the strategic nature of the LAP. For detailed discussion and guidance refer to Section 3.5 of the SFRA document that formed part of the SEA documentation that accompanied the Proposed Material Alterations on public display.</p>
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		<p>based provision of SuDS might be appropriate for specific development sites.</p> <p><u>Consideration of Climate Change Impacts</u></p> <p>The submission welcomes that all references to ‘OPW Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management (2009)’ have been removed. It should be noted that equivalent, updated information, including an update to the now deleted Table 4 are included in the Sectorial Adaptation Plan.</p> <p><u>Justification Test</u></p> <p>The OPW outlines in the Draft Tuam LAP submission that undeveloped sites;</p> <ul style="list-style-type: none"> • Community Facilities which can allow highly vulnerable development east of the Parkmore estate; • An area of partially undeveloped land zoned less vulnerable Industrial adjacent to Larkin Engineering between the River Clare and the N17 which overlaps with Flood Zones A and B. <p>The submission notes the Chief Executive’s response regarding undeveloped sites that development would be limited in areas at elevated risk of flooding.</p> <p>It is stated as in the Draft Tuam LAP submission that “Any lands that are undeveloped within Flood Zones A and B, where inappropriate development is proposed, should be</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted. The Draft Tuam LAP will be amended to reflect this.</p>
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		<p>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><u>MA9</u></p> <p>The submission notes the amendment of the land use matrix table on Industrial and Business and Enterprise zonings regarding the Plan Making Justification Test. The OPW states that the Plan Making Justification Test is suitable for assessing such land uses. Any undeveloped BE or I zoned lands located in Flood Zone A which do not satisfy all criteria of the Plan Making Justification Test should be rezoned for water compatible usage. For any previously developed lands it should be noted that the Justification Test has not been passed. Any future development should be limited to that which would not require a Plan Making Justification Test, as defined in section 5.28 of the Guidelines and in Circular PL2/2014.</p> <p><u>MA39, MA55 and MA56</u></p> <p>The OPW requests that Planning Authorities consider climate change impacts in the Plan-making Stage, such as by avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences, and setting specific development management objectives.</p>	<p>Noted. The Draft Tuam LAP will be amended to reflect this.</p> <p>Noted. See the Chief Executive’s Response to the OPR (GLW-C62-11) submission Recommendation 1, Recommendation 2 and Recommendation 3 above.</p> <p>Chief Executive’s Recommendation:</p> <ul style="list-style-type: none"> • MA8: Amend the <i>Policy Objective TKT 52 Flood Risk Management</i> as follows:
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			<p>TKT 52 Flood Risk Management</p> <p>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> <ul style="list-style-type: none">• MA8: Amend the General Notes on Land Use Zoning Matrix as follows: "11. Insert Asterix under all uses for Industrial Zoning where the matrix indicates "Permitted in Principle" and "Open to Consideration". This is applicable on the lands: adjacent and including the existing commercial/industrial development between the River Clare and the N83; and lands to the south east of the N17/M17 and N83/Galway Road roundabout. This shall be limited in areas at elevated risk of flooding, as per the Flood Risk Management Guidelines, as follows:<ul style="list-style-type: none">○ 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."
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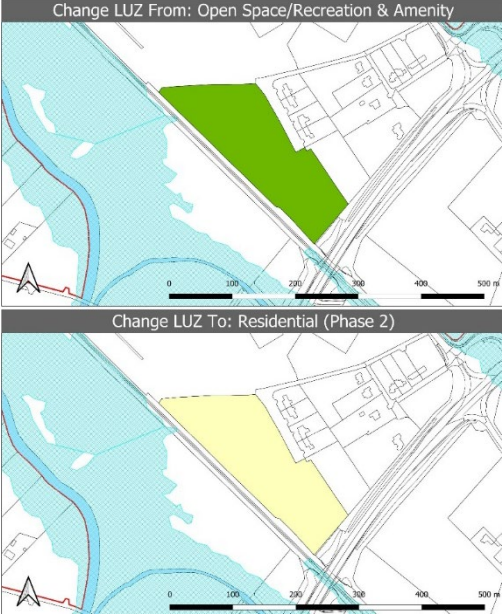
			<p>MA9: Amend the General Notes on Land Use Zoning Matrix as follows:</p> <ul style="list-style-type: none"> To update the meaning of the “BE – Business and Enterprise” land use zoning objective by adding the following to the “General Notes on Land Use Zoning Matrix” under Table 1.6.1 “Land Use Matrix”: <p>12. Uses “Permitted in Principle” and “Open to Consideration” for Lands zoned “BE – Business and Enterprise” shall be limited in areas, as per the Flood Risk Management Guidelines, as follows:</p> <ul style="list-style-type: none"> 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 <p>would not pass the Plan Making Justification Test. Furthermore, the Plan Making Justification Test is unsuitable for assessing Business and Enterprise zoned lands, which are not consistent with the condition that any lands justified are essential in achieving compact and sustainable urban growth. Consequently, developments on lands zoned “BE Business and Enterprise” shall be limited as per the requirements of Policy Objective V Constrained Land Use.</p> <p>These This limitations shall take primacy over any related provision relating to the land use zoning matrix.</p> <ul style="list-style-type: none"> To update the meaning of the “I – Industrial” land use zoning objective by adding the following to the
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			<p>“General Notes on Land Use Zoning Matrix” under Table 1.6.1 “Land Use Matrix” of the Plan</p> <p>13. Lands zoned “I Industrial” would not pass the Plan Making Justification Test.</p> <p>Furthermore, the Plan Making Justification Test is unsuitable for assessing Industrial-zoned lands, which are not consistent with the condition that any lands justified are essential in achieving compact and sustainable urban growth. Consequently, developments on lands zoned “I Industrial” shall be limited as per the requirements of Policy Objective TKT 41 Constrained Land Use.</p> <p>This limitation shall take primacy over any related provision relating to the land use zoning matrix</p> <ul style="list-style-type: none"> • Map Illustrating Constrained Land Use will reflect the final plan • Amend the Strategic Flood Risk Assessment Attached as Appendix B with references to PFRA mapping from Table 3 in the SFRA removed.
GLW-C62-4	Dept of Education	The submission refers to the population growth identified for Tuam in the GCDP 2022 – 2028 and the Draft Tuam LAP. It is noted there are no amendments to the population projection as outlined in the Draft Tuam LAP and therefore re-confirms the projected school requirements as per their submission made on the Draft Tuam LAP on the 23 rd March 2023 (<i>Submission no. GLW-C42-51</i>).	<p>Chief Executive’s Response: Submission Noted.</p> <p>Chief Executive’s Recommendation: No Change.</p>

		The Department welcomes MA15 which seeks to amend <i>Policy Objective TKT 34 Pedestrian and Cycle Network</i> to facilitate the improvement of the pedestrian and cycling environment and network.	
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General Submissions

Submission No.	Submission No.	Submission No.	Submission No.
GLW-C62-1	Denis C. Higgins	<p>The submission relates to the zoning of land in Airglooney. </p> <p>The submission objects the zoning of land from Residential Phase 2 to Open Space/Recreation and Amenity for the following reasons:</p> <ul style="list-style-type: none"> • Land zoned residential since c. 2000; • Planning application lodged but was withdrawn, pending the location of the Tuam Bypass; • Final location of the Bypass overlay the access to the proposed development. • A request was sent to Galway County Council and the National Roads Authority on the 27/09/2021 to move slightly the Bypass eastwards but this was not accepted; • It is stated that these lands would be developed by now if it wasn't for the Tuam ByPass; • It is stated that the lands should be developed with LDH (Low Development Housing) where housing is required and that 	<p>Chief Executive's Response:</p> <p>Submission Noted. As part of the preparation of the Draft Tuam Local Area Plan 2023-2029, the lands were zoned appropriately. There is a requirement for 30.3 ha Residential Phase 1 lands in Tuam. The request to rezone from Residential Phase 2 to Residential Phase 1 was considered in the Chief Executive's report in the Draft Plan. However, there were sufficient Residential Phase 1 lands zoned.</p> <p>During the deliberation of the Chief Executive Report on submissions received on the Draft Tuam Local Area Plan the Elected Members proposed to zone the subject lands Open Space/Recreation and Amenity. This was contrary to the recommendation of the Chief Executive.</p> <p>In accordance with section 20 (3) (q) of the Planning and Development Act (2000) as amended at this stage of the Plan making process, only minor modification can be made and no increase of zoning of lands.</p> <p>Therefore, it is considered that the subject lands should revert back to Residential Phase 2 as per the Draft Tuam LAP.</p>

		<p>the development will conform to Government policy;</p> <ul style="list-style-type: none"> • Due to the urgency of housing and Government policy, it has already been requested that these lands would be zoned Residential Phase 1 as part of the Draft Tuam Local Area Plan ; • It is stated that the lands are fully serviceable with public water, sewerage, roads etc. 	<p>Chief Executive’s Recommendation: MA34: Revert the zoning to Residential Phase 2 as per the Draft Tuam Local Area Plan 2023-2029.</p> 
GLW-C62-5	Brock McClure Planning and Development Consultants (On behalf of Valeo, submitted by Linda McEllin)	<p>The submission refers to Material Alterations (MA 11 and MA12) and the previous submission (<i>no. GLW-C42-52 of the Draft Tuam LAP</i>).</p> <p>MA12 In relation to this material alteration, the amendment of the land use matrix table for the two uses of ‘Small Scale Manufacturing’ and ‘Industrial Light Use’ to be “Open to Consideration on Business and Technology lands is welcomed. However, it is</p>	<p>Chief Executive’s Response: Submission Noted.</p> <p>As part of the review of the submissions received on the Draft Tuam Local Area Plan 2023-2029, it was considered appropriate to amend the land use matrix table and that both uses should be (Open to Consideration with an appropriate Footnote to be</p>

		<p>requested that these uses would be recategorized to “Permitted in Principle”, as originally requested at the Draft Plan stage.</p> <p>Clarity is sought in relation to the asterix identified in the land use zoning matrix table under the “Open to Consideration” category. This is referenced as “O*” against ‘Small Scale Manufacturing’ and ‘Industrial Light Use’. There is no explanation for this with the Material Alterations published as to what this asterix references.</p> <p>MA11</p> <p>This material alteration is welcomed with reference to manufacturing opportunities on Business and Technology land use zone.</p>	<p>inserted). It is not considered warranted to further amend these uses as requested.</p> <p>In relation to the asterix, it references a footnote that should have been inserted as follows “<i>Each application will be assessed within the principles of sustainable planning and the policy objectives of Business and Technology lands</i>”.</p> <p>Noted.</p> <p>Chief Executive’s Recommendation: Insert the following footnote as follows: <i>8. Each application will be assessed within the principles of sustainable planning and the policy objectives of Business and Technology lands.</i></p>
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