



Comhairle Chontae na Gaillimhe
Galway County Council

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

November 2023

Chief Executive's Report on Submissions
Received on the Material Alterations

Draft Athenry Local Area Plan 2023-2029

Chief Executive's Report on Submissions Received on the Material
Alterations to the Draft Athenry 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 (LAP) and has been prepared following the receipt of submissions and observations with respect to the proposed Material Alterations to the Athenry 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 observations 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 and associated Environmental Report were available for public inspection during normal opening hours from Thursday, 5th October to Friday, 3rd November 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 MA70) did not require a Stage 2 AA and the following Material Alterations require SEA and consideration in a SEA Environmental Report:

- MA40
- MA41
- MA42
- MA43
- MA46
- MA47
- MA49

- MA51
- MA57
- MA65

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 Athenry and Oranmore Municipal District Members in November 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 Athenry Local Area Plan 2023-2029 was placed on public display for 6 weeks, from Thursday 25th May 2023 until Friday 7th July 2023 (inclusive).

The Chief Executive's Report was circulated to the Elected Members on 17th August 2023. The Elected Members of the Athenry and Oranmore Municipal District held a Special meeting on the 19th September 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 Athenry Local Area Plan 2023-2029 and the associated environmental reports, were available for inspection during normal opening hours from Thursday 5th October 2023 until Friday 3rd November 2023 (both dates inclusive).

During the public consultation period, submissions were received in relation to the proposed Material Alterations to the Draft Athenry LAP. In this regard, a total of 30 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 Athenry 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 Athenry 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 Athenry Local Area Plan 2023-2029:

Submissions Received - 30

	Submission No.	Name	Date Received
1	GLW-C72-25	Office of Planning Regulator	03/11/2023
2	GLW-C72-24	Uisce Éireann	03/11/2023
3	GLW-C72-9	Department of Housing, Local Government and Heritage	02/11/2023
4	GLW-C72-2	Department of Education, Forward Planning & Site Acquisition	19/10/2023
5	GLW-C72-8	Office of Public Works	02/11/2023
6	GLW-C72-3	Transport Infrastructure Ireland	27/10/2023
7	GLW-C72-19	National Transport Authority	03/11/2023
8	GLW-C72-1	Environmental Protection Agency	06/10/2023
9	GLW-C72-12	Bellerin 3A Ltd	02/11/2023
10	GLW-C72-20	A Martens (on behalf of Coffey Group)	03/11/2023
11	GLW-C72-21	Enviroplan Consulting Ltd (on behalf of Laurem Construction Ltd)	03/11/2023
12	GLW-C72-22	Grealish Glynn & Associates (on behalf of Sharon Lally)	03/11/2023
13	GLW-C72-23	Noel and Sharon Lally	03/11/2023
14	GLW-C72-26	MKO (on behalf of Highgate Ltd - AJ Deane)	03/11/2023
15	GLW-C72-27	MKO (on behalf of Highgate Ltd - Keira Ruane)	03/11/2023
16	GLW-C72-4	Jim Reidy	31/10/2023
17	GLW-C72-28	Fern Hill and Stonehaven Residents	03/11/2023

18	CLW-C72-5	Anton Tsernjavski	02/11/2023
19	CLW-C72-7	Anton Tsernjavski	01/11/2023
20	CLW-C72-30	Linda Crowe	03/11/2023
21	CLW-C72-6	Sharon Crowe	01/11/2023
22	CLW-C72-11	Peter Sullivan	02/11/2023
23	GLW-C72-10	Enviroplan Consulting Ltd (on behalf of RHOC Athenry Ltd)	02/11/2023
24	CLW-C72-17	MKO (on behalf of IDA Ireland)	03/11/2023
25	GLW-C72-13	John Moylan	02/11/2023
26	GLW-C72-14	Michael Quinn	03/11/2023
27	GLW-C72-15	Michael Quinn	03/11/2023
28	GLW-C72-16	MKO (on behalf of MJ Quinn and SIP Energy, Athenry)	03/11/2023
29	GLW-C72-18	Gareth Elhinney & Mary McGill	03/11/2023
30	GLW-C72-29	Noel and Sharon Lally	03/11/2023

2. Submissions

Office of Planning Regulator

GLW-72-25

The Office of Planning Regulator (OPR) acknowledged the considerable and evident work in preparing the proposed Material Alterations to the Draft Athenry Local Area Plan (LAP) 2023 – 2029. The OPR notes that the evaluation and assessment of the proposed Material Alterations have had regard to the Galway County Development Plan (GCDP) 2022 – 2028, the Regional Spatial and Economic Strategy (RSES) and relevant section 28 of guidelines.

The OPR welcome MA67 and MA68 which responded to Recommendation 1 and Recommendation 3 of the OPR's submission to the Draft LAP and addressed the requirement in relation to a tiered approach to zoning under NPO 72 (a-c).

The OPR expressed satisfaction with the approach in relation to residential development in the Draft LAP, in particular the general consistency with the core strategy of the Galway County Development Plan 2022-2028. The OPR have no objections to the majority of the Material Alterations that propose to zone land for residential development within the Settlement Boundary. However, there are a number of residential zonings, particular Residential Phase 1 zoning, which are located on the periphery of the town and are not consistent with the Core Strategy of the Galway County Development Plan 2022 – 2028 (GCDP). The Planning Authority notes the OPR's comments in this regard.

The OPR notes although an Infrastructure Assessment was submitted for Employment Use, however, it is stated that an adequate rationale for the lands zoned in the Draft LAP has not been provided. The proposed Material Alteration to zone additional land for employment generating uses, in peripheral location and in a piecemeal manner would not be consistent with a compact pattern of development. The OPR states these locations, in some cases are not adequately serviced; poorly connected to Town Centre First (2022) and are provided without an evidence-base for such zoning.

The OPR had concerns in relation to flooding for the Furzypark area. While the OPR welcomes proposed Material Alteration MA13 to address the flood risk concern in Furzypark, it is noted that the OPW are seeking further clarification in relation to the flood extents in the Furzypark area.

The OPR states, the proposed Material Alteration to zone additional land for Open Space/Recreation and Amenity is of concern as these lands are in a peripheral location and are poorly connected to town centre, particularly by walking and cycling, undermining the Draft LAP objectives to promote sustainable settlement and transport strategies.

It is within this context that the submission sets out **Three Recommendations** and **One Observation under Four Themes**.

1. Core Strategy and Land Use Zoning for Residential Use

The OPR has concerns regarding, MA5, MA40, MA41, MA43, MA46, MA47, MA49, MA65, MA48, MA50, MA51, MA59, MA60 and MA24. The proposed Material Amendments include a further 19ha representing an increase of approx. 88% Residential Phase 1 lands. The OPR acknowledges the need

to provide housing within settlements, however, the scale of the proposed increase raises concerns in this case. It is stated that several proposed Material Alterations are poorly located, lack the necessary infrastructure to be delivered in the lifetime of the LAP and are not necessary to ensure a sufficient supply of zoned land consistent with the core strategy of the Development Plan.

MA40, MA41 and MA43 are sizeable parcels of land in the context of the core strategy and are located to the south west of the town adjacent to the rail line. These sites are accessed from a local rural road with no footpath or cycle path infrastructure, as highlighted in the infrastructure assessment. The zoning of these sites would increase vehicular and pedestrian traffic along the main access route to the town centre and crossing the rail line at a bridge which has limited capacity to accommodate increased movements. The OPR notes no timeline for the delivery of infrastructure, including the widening of a bridge over a rail line, have been provided despite this being requested as part of Observation 3 of the Office's submission on the Draft LAP. The SEA undertaken to inform the decision-making process for the proposed Material Alterations indicates that these sites are unsuitable and could lead to a negative impact on the environment as well as being in excess of the core strategy requirement. The Appendix III of the SEA Environmental Report also notes that '*... development at this location would conflict with established higher-level objectives relating to compact growth, sustainable mobility and transition to a low carbon and climate resilient society.*'

MA46 and MA49 are zoned Residential Phase 1 from outside the settlement boundary. The scale of this zoning, relative to the core strategy requirements, is a concern and would be inconsistent with National and Development Plan's growth targets. The OPR notes that the Draft LAP provided sufficient land to meet anticipated development requirements set out in the Core Strategy in a sequential and coordinated manner. The OPR states that there are other lands which are zoned and serviced to meet demand. Therefore, there is no evidence-based rationale to support the proposed Material Alterations. The OPR further notes the lands are removed from the town and are located beyond the proposed Part 8 Relief Road, lack the required infrastructure and are less sequential preferable, compared to other lands in the town. Moreover, it is stated that Section 6.2.4 of the amended Athenry Draft Local Transport Plan notes the narrowness of parts of the road at these sites will require the acquisition of set-backs from the relevant landowner. The OPR references Appendix E (Infrastructure Assessment on Residential Lands) is consistent with this approach and notes a lack of lighting with significant intervention required for each site. The required upgrades to the access road and respective timelines are uncertain and the sites are not considered to be serviced or serviceable within the lifetime of the Plan. The rezoning of the lands 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). The Appendix III of the SEA Environmental Report also notes that 'These Proposed Material Alterations would zone more sensitive, less well serviced lands, further away from the established built envelope of the settlement (outside the draft plan boundary) with associated unnecessary potential significant adverse effect on a variety of environment components...'

MA5 and MA47 are of concern to the Office, as well as associated M48. The OPR notes these lands are outside the settlement boundary, outside the Relief Road, are not sequentially preferable to other serviced lands and are lacking infrastructure including pathways and cycling facilities. The concerns raised in the SEA as to the adverse environmental impact in relation to the proposed zoning alterations. The SEA concerns are the same as those raised for MA46 and MA49 '*... The zoning of these*

additional lands to the south would require significant analysis and measures to be proposed at a project level to improve connectivity to these lands and crossing of the R348. The OPR has raised concerns that safe and convenient pedestrian access to the town or local services is not available. The issues identified are also relevant to MA48 which is proposed to be zoned Residential Existing, while there is not an existing dwelling on site, therefore the zoning is not acceptable.

MA65, is located less sequentially preferable to other sites. As previously discussed, the Draft LAP provided sufficient land to meet anticipated development requirements set out in the core strategy in a sequential and coordinated manner. While the site is considered to be serviced, it is noted the lands were previously not zoned for residential use. Having regards to the environmental concerns raised in the SEA, and that the Draft LAP provided sufficient zoned land to meet the housing growth targets, it is considered that the proposed material amendment is unjustified given there are more suitably located zoned land available to provide for consolidated plan-led growth in Athenry in accordance with national and regional policy objectives.

The OPR notes a number of sites proposed to be zoned Residential Phase 2 that raise concerns. The zoning proposed by Material Alterations MA50, MA51, MA59, MA60 and MA24 are outside of the settlement boundary for the town, are less sequentially preferable to other Phase 2 lands and do not have appropriate access to public roads and footpath provision.

Reference has been made to several sites proposed to be zoned Residential Phase 2 that raise concerns for the Office. In relation to the zoning proposed in MA50 and MA51, it is noted that *Appendix E Infrastructure Assessment on Residential Lands* which indicates significant intervention required with regards to the provisions of services. The OPR notes the sites are in close proximity to the permitted Part 8 Relief Road and as such it is not considered that these lands are suitable for a Phase 2 zoning whilst there is already a sufficient quantity of Phase 2 zoned lands elsewhere. More favourably located lands to deliver a compact form of development are available. The Appendix III of the SEA Environmental Report has also specifically outlined MA51 that ‘these proposed material alterations would zone more sensitive, less well serviced lands, further away from the established built envelope of the settlement (outside the draft plan boundary) with associated unnecessary potential significant adverse effect on a variety of environment components...’

MA Recommendation 1 – Land Use Zoning for Residential Use

Having regard to the provision of new homes at that can support compact and sustainable development, and in particular to the following:

- the core strategy of the Galway County Development Plan 2022 - 2028;
- national and regional policy objectives NPO 3, RPO 3.1 and RPO 3.2 for compact growth;
- 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
- NPO 72a-c and Appendix 3 of the NPF for the co-ordination of land use zoning, infrastructure and services,

the planning authority is required to make the LAP without the following proposed Material Alterations:

- (i) MA5 – Outside the Settlement Boundary to Residential Phase 1;
- (ii) MA24 - Agriculture to Residential Phase 2;
- (iii) MA40 – Residential Phase 2 to Residential Phase 1;
- (iv) MA41 – Agriculture to Residential Phase 1;
- (v) MA43 – Agriculture to Residential Phase 1;
- (vi) MA46 – Outside the Settlement Boundary to Residential Phase 1;
- (vii) MA47 – Outside the Settlement Boundary to Residential Phase
- (viii) MA48 – Outside the Settlement Boundary to Residential Existing;
- (ix) MA49 – Outside the Settlement Boundary to Residential Phase 1;
- (x) MA50 – Open Space/Recreation & Amenity to Residential Phase 2;
- (xi) MA51 – Outside the Settlement Boundary to Residential Phase 2;
- (xii) MA59 – Open Space/Recreation & Amenity to Residential Phase 2;
- (xiii) MA60 – Agriculture to Residential Phase 2; and
- (xiv) MA65 – Agriculture to Residential Phase 1.

Chief Executive’s Response

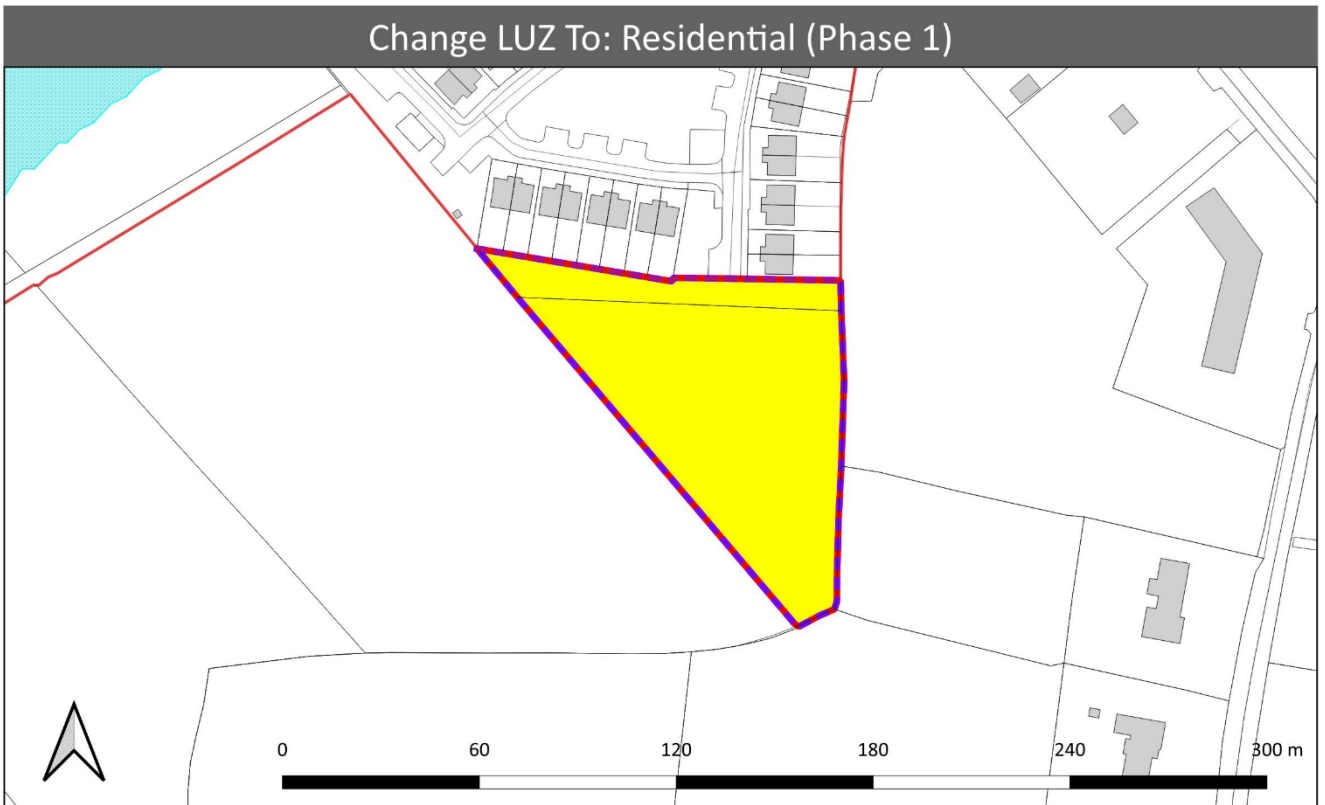
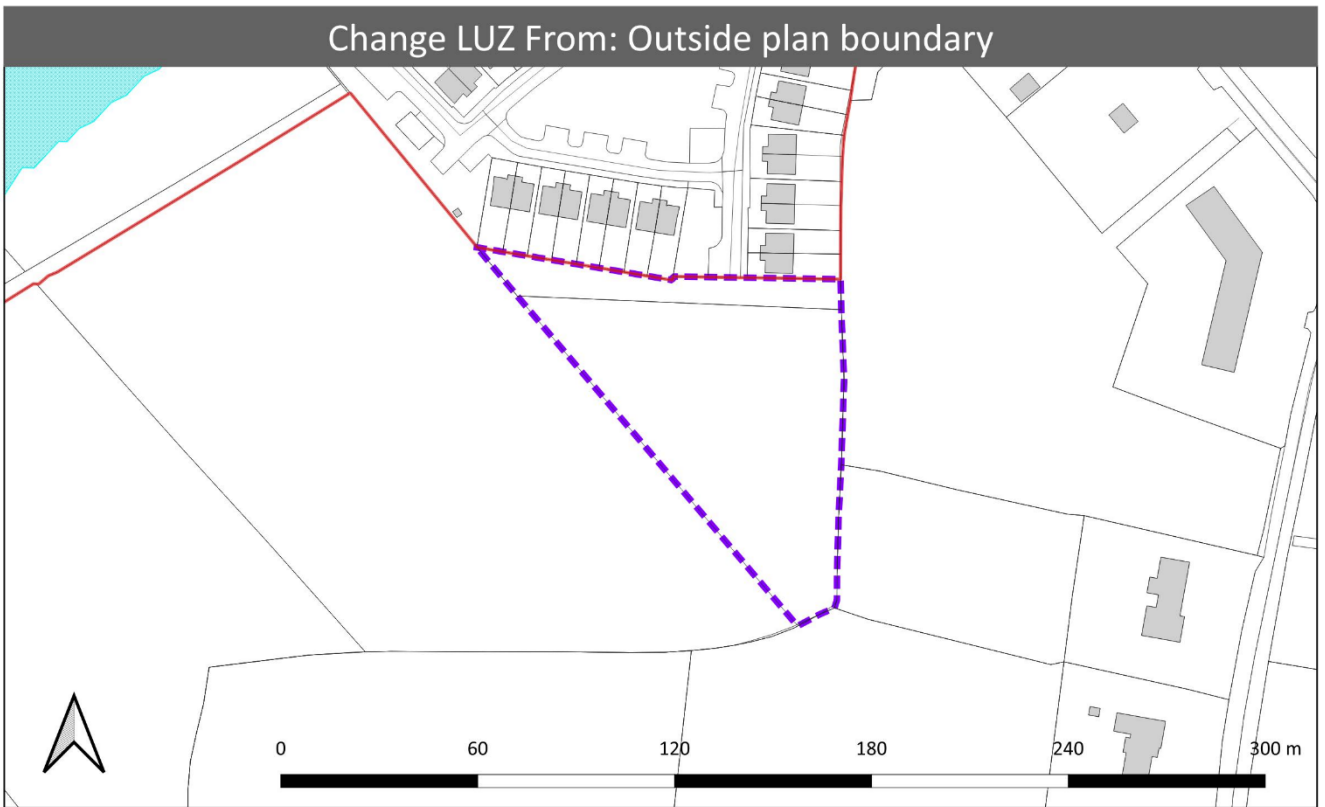
The content of the submission is noted. The Planning Authority notes the view of the OPR with regards to Material Alterations MA5, MA40, MA41, MA43, MA46, MA47, MA48, MA49, MA65, MA50, MA51, MA59 and MA60. The lands subject to these Material Alteration’s should revert as per the Draft Athenry LAP 2023 – 2029.

In relation to MA5, this Material Alteration was a consequence of the reallocation of Residential Phase 1 lands in accordance with the Core Strategy of the GCDP 2022 – 2028). It is considered appropriate to retain MA5 as Residential Phase 1.

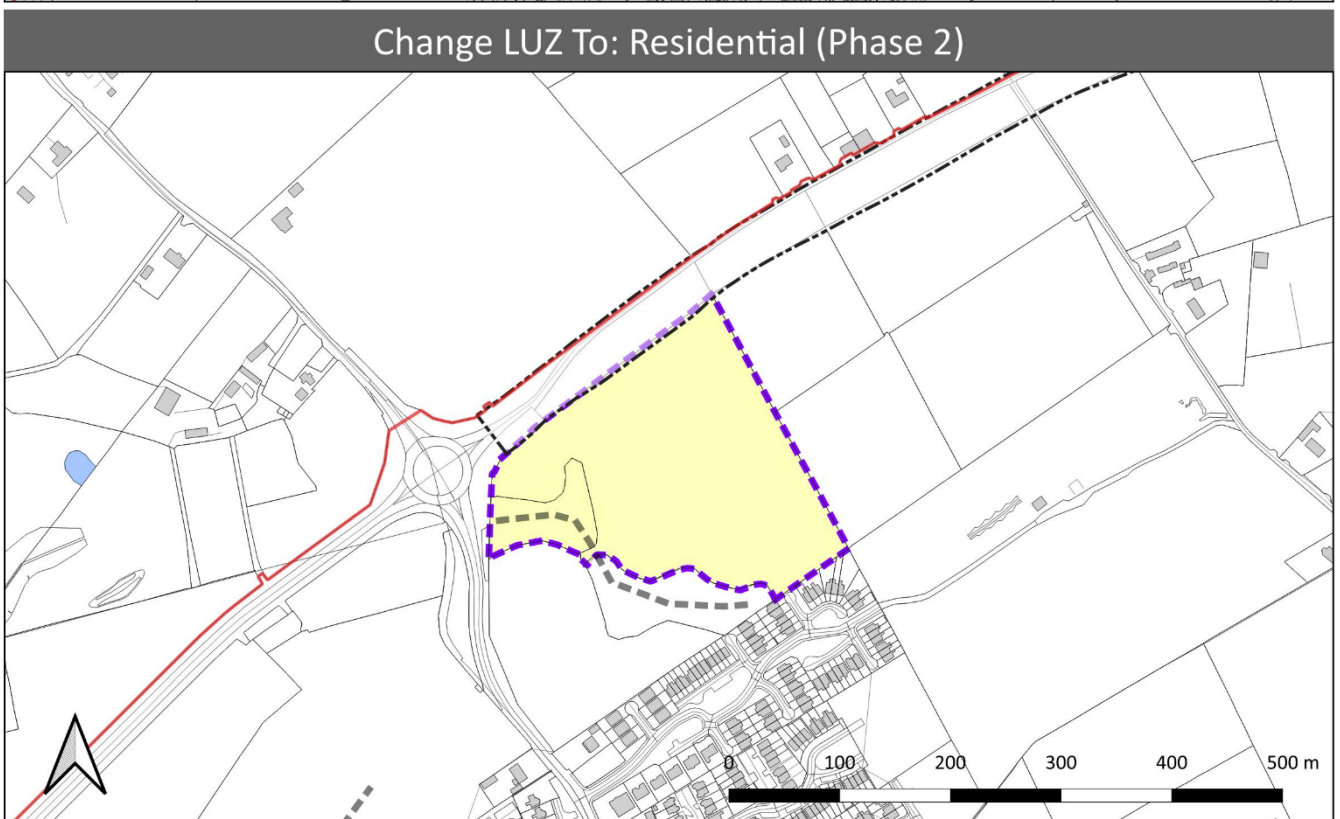
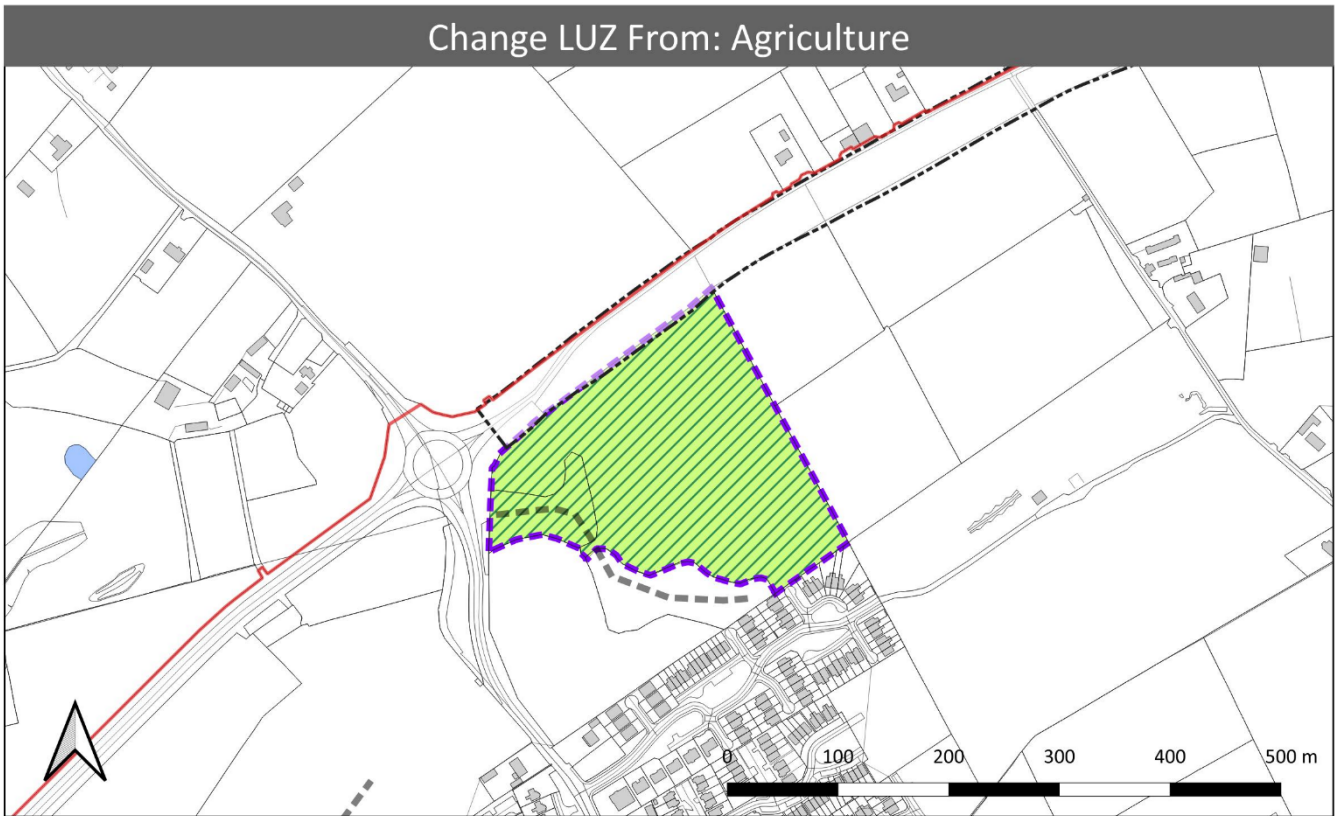
In regard to MA24 it is considered appropriate to rezone these lands Residential Phase 2 as a result of the commitment from the Planning Authority to prepare a Urban Framework Plan for all of the lands in this area. See Policy Objective ASP 6 Urban Framework Plan in Residential Phase 2 lands (Caheroyne).

Chief Executive’s Recommendation

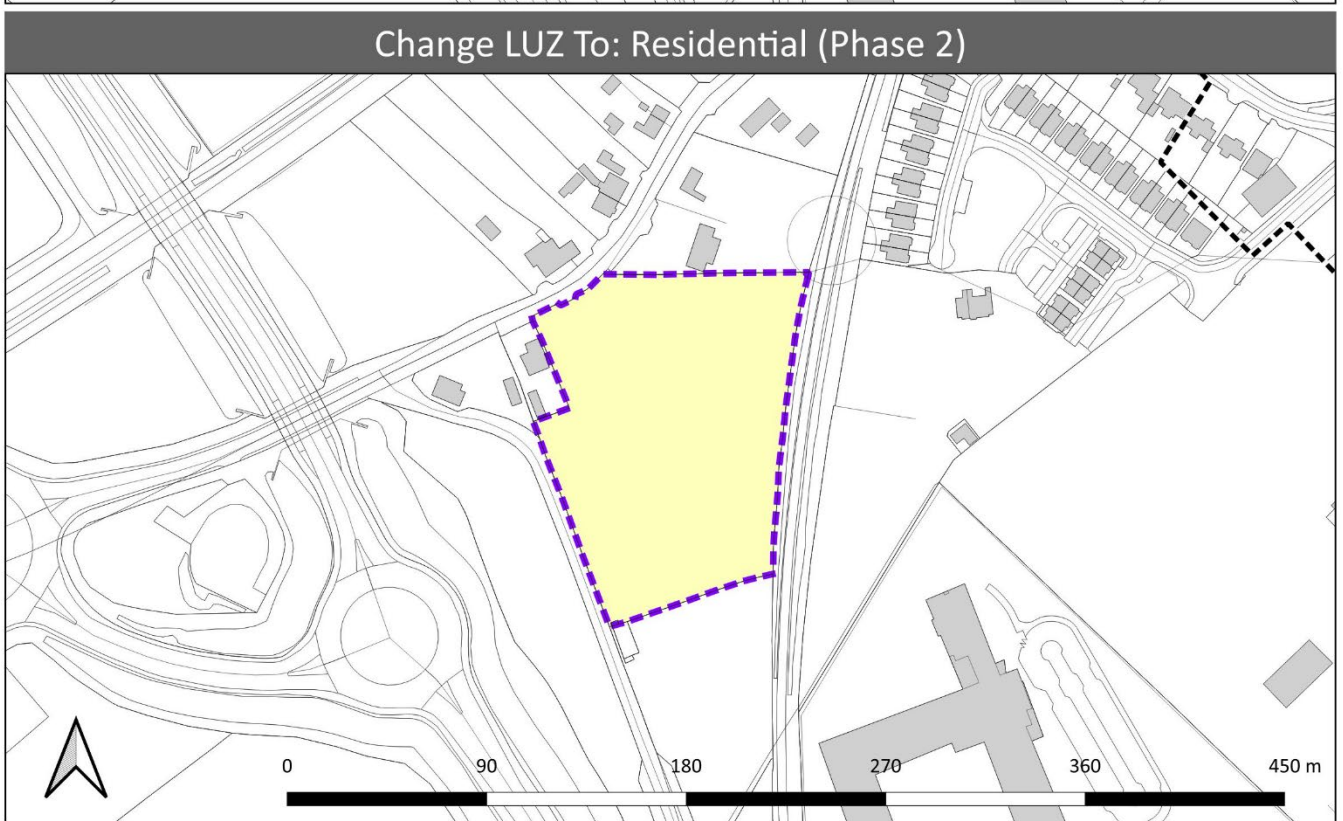
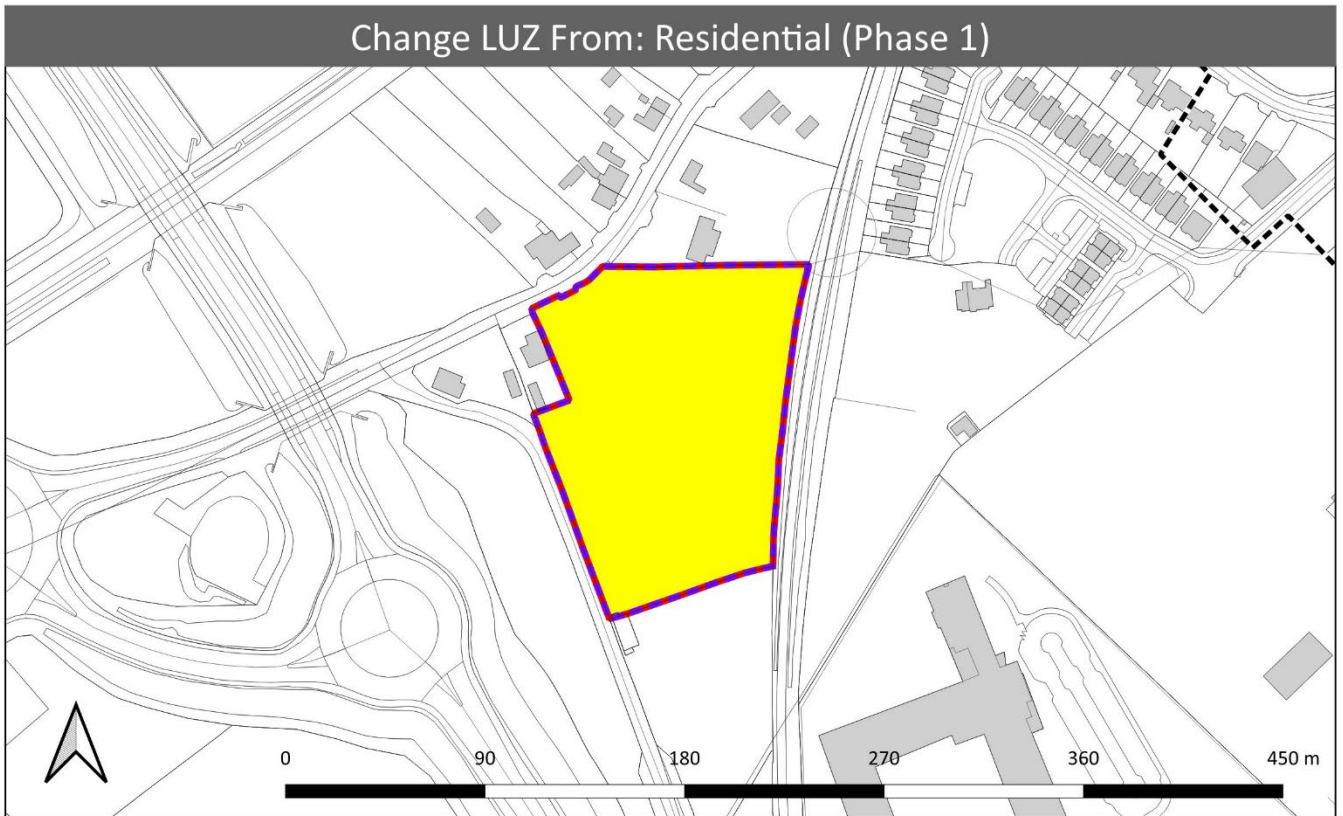
- i. **MA5:** Retain Residential Phase 1 zoning as per MA5.



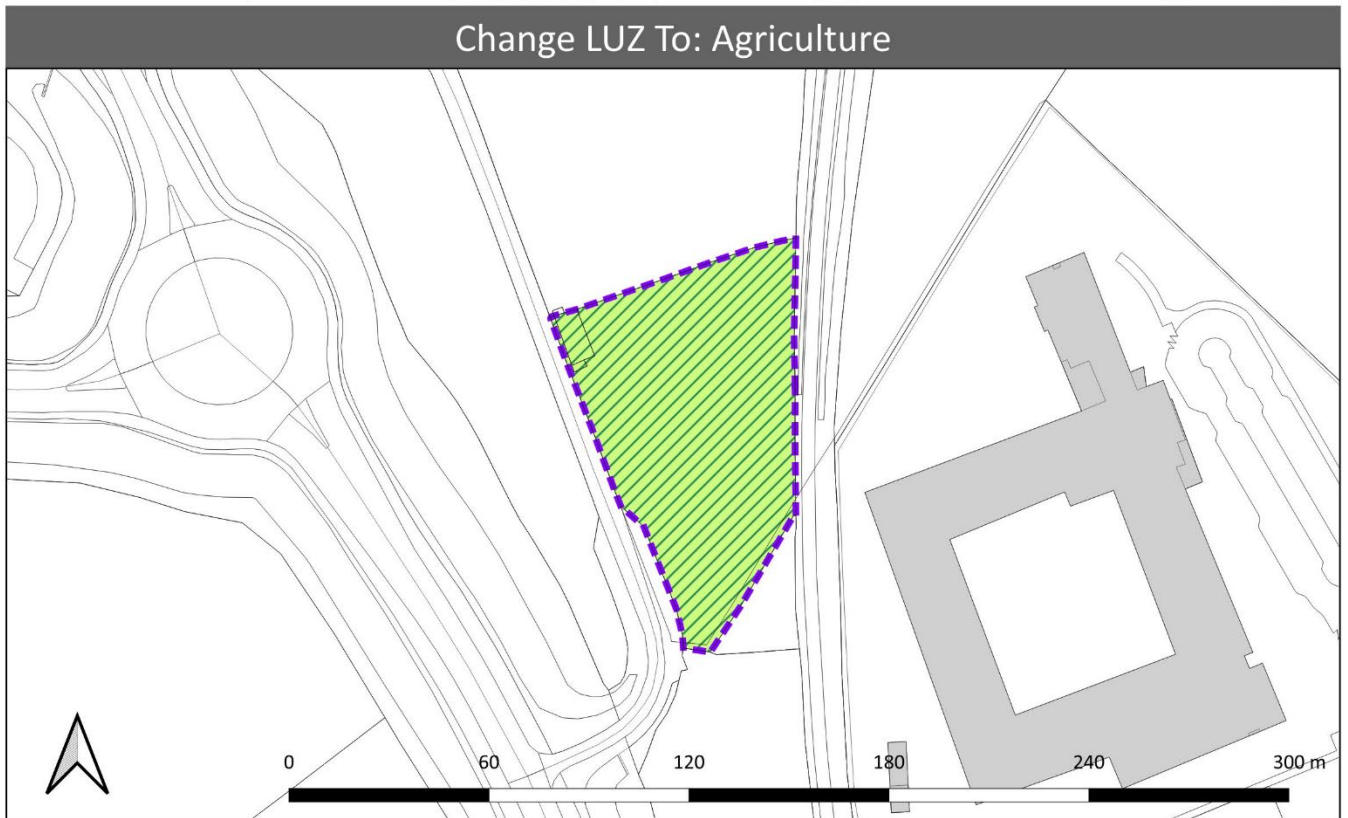
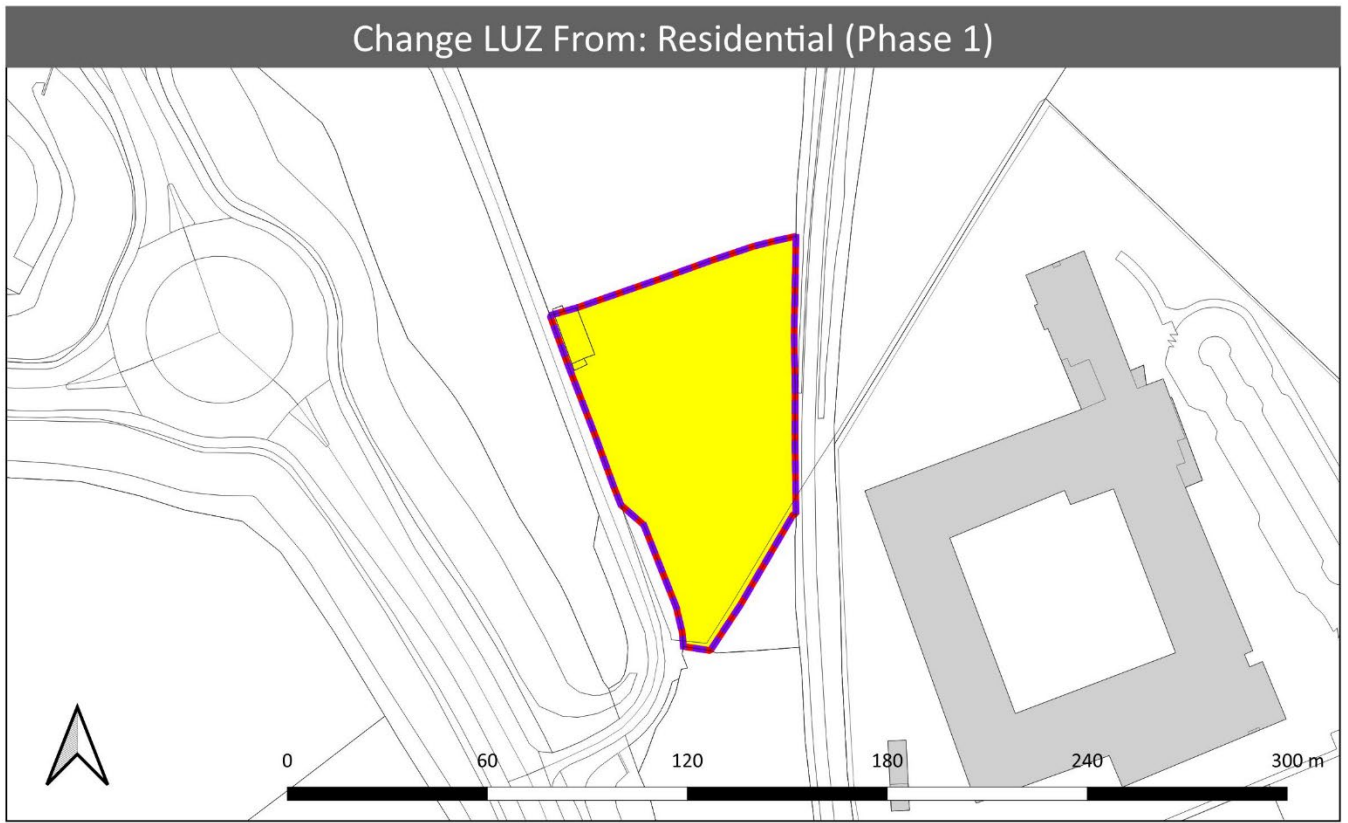
- ii. **MA24:** Retain Residential Phase 2 zoning as per MA24.



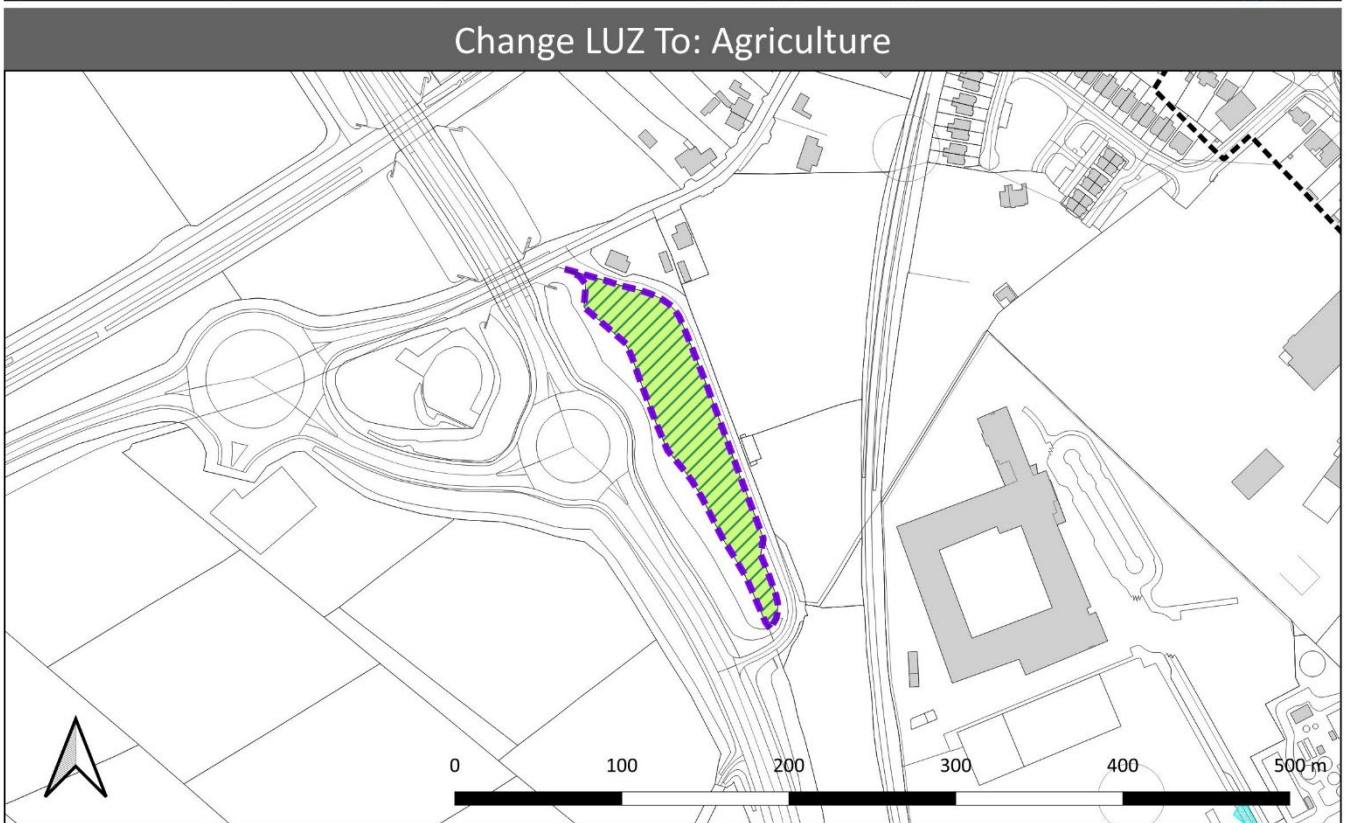
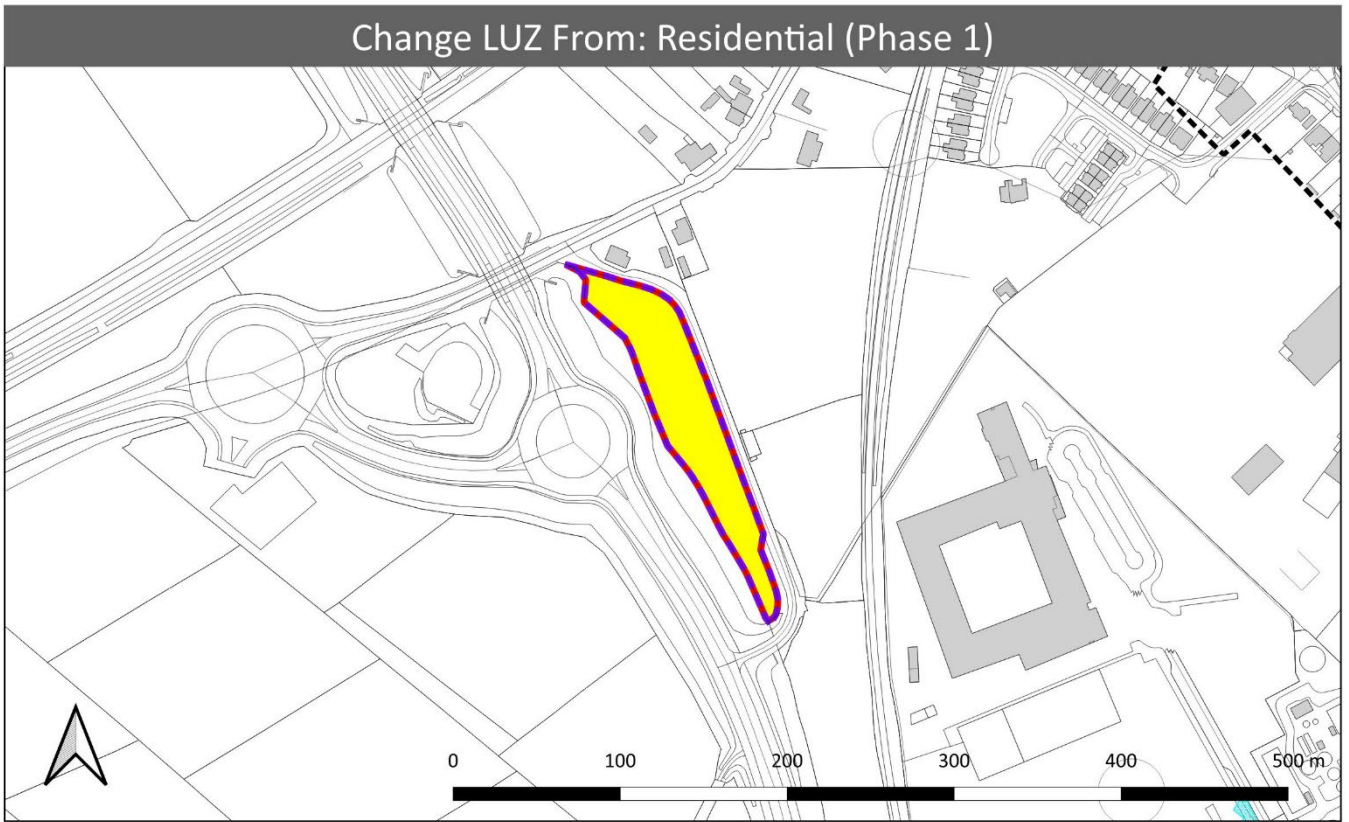
- iii. **MA40:** Revert to the provisions of the Draft Athenry LAP where this land was zoned Residential Phase 2.



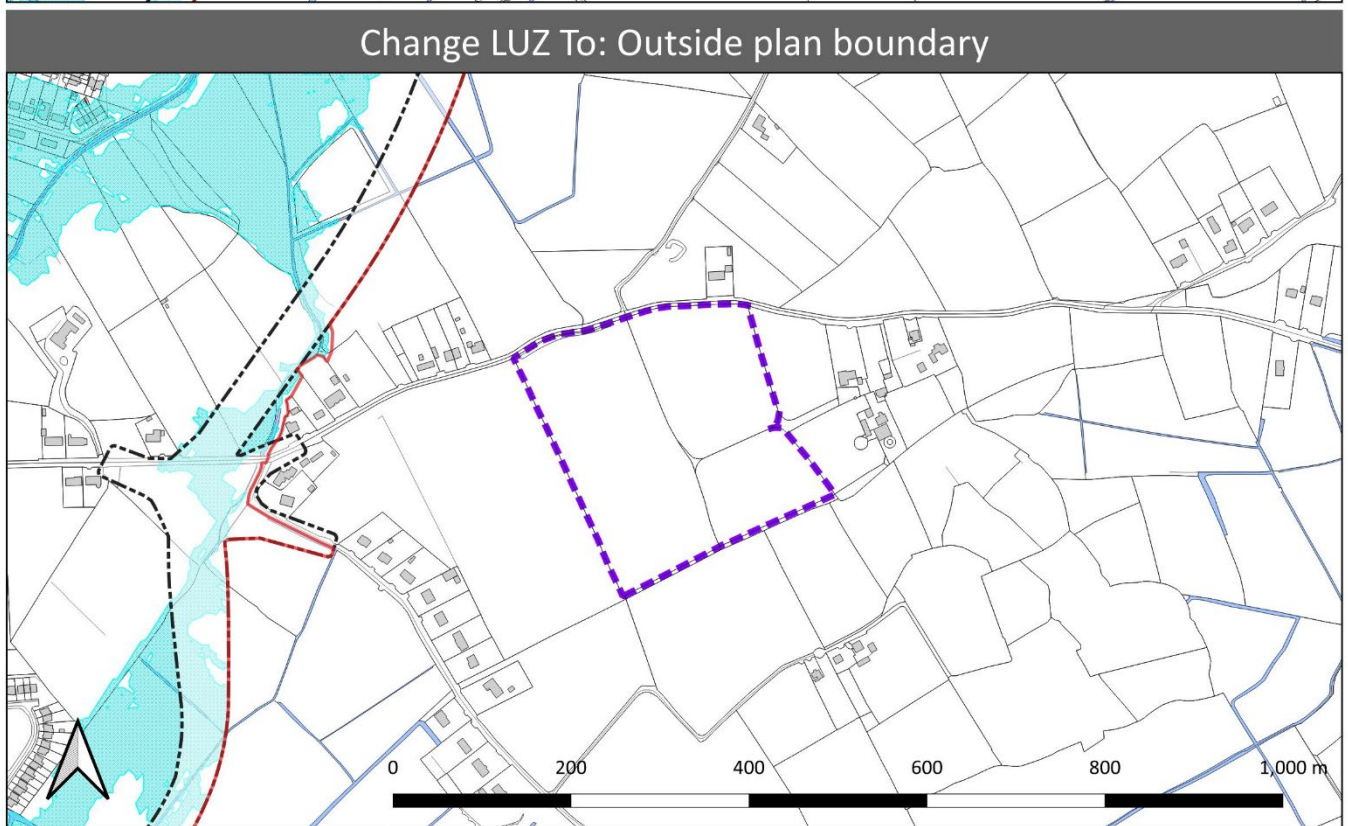
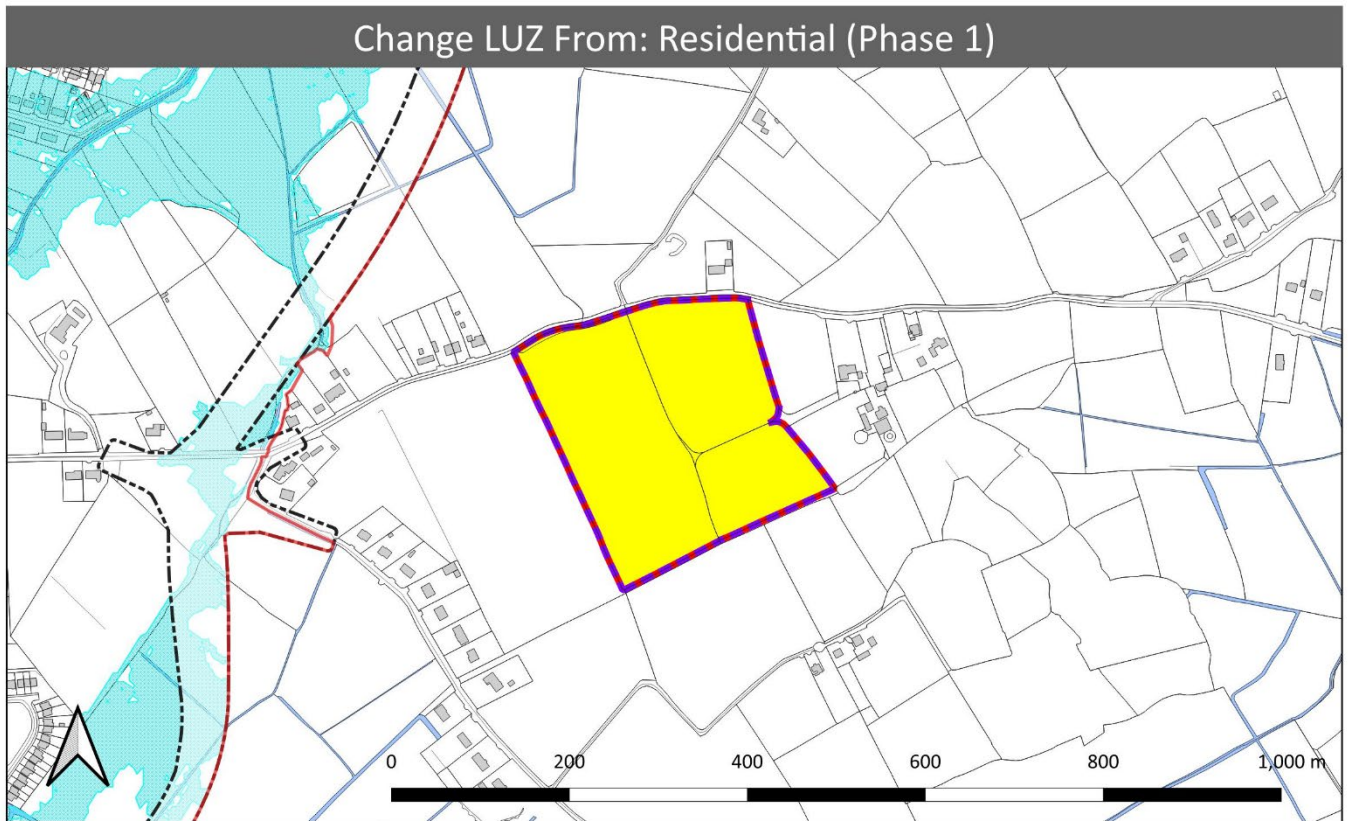
- iv. **MA41:** Revert to the provisions of the Draft Athenry LAP where this land was zoned Agriculture.



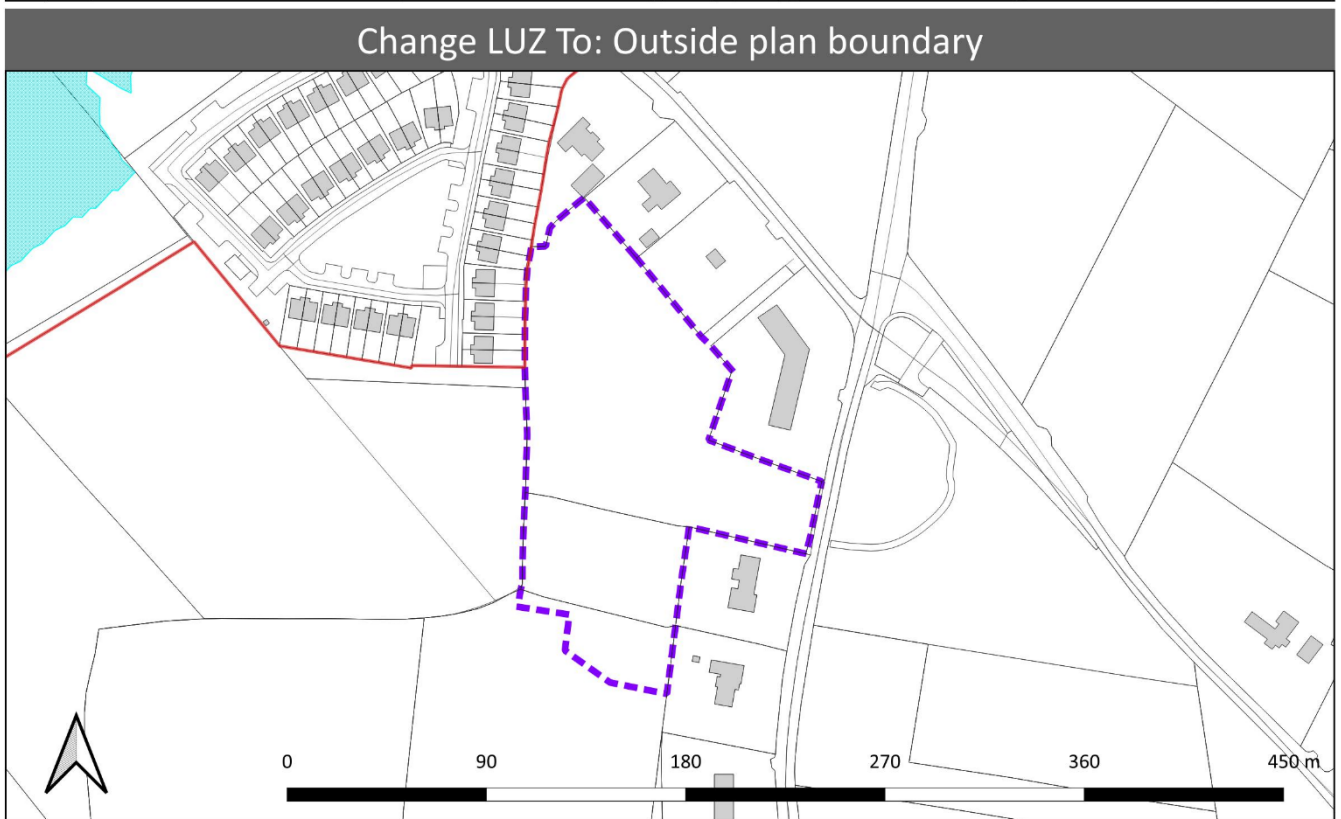
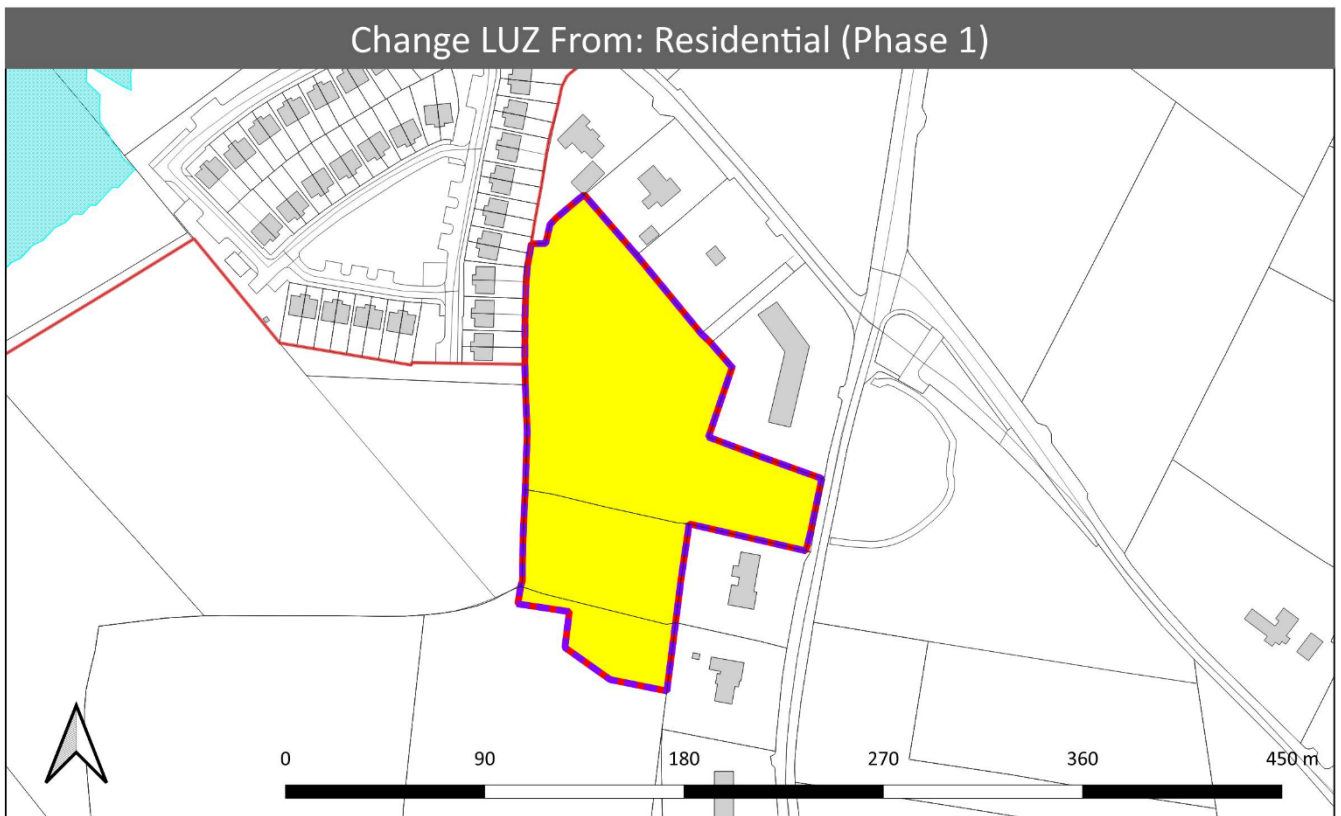
- v. **MA43:** Revert to the provisions of the Draft Athenry LAP where this land was zoned Agriculture.



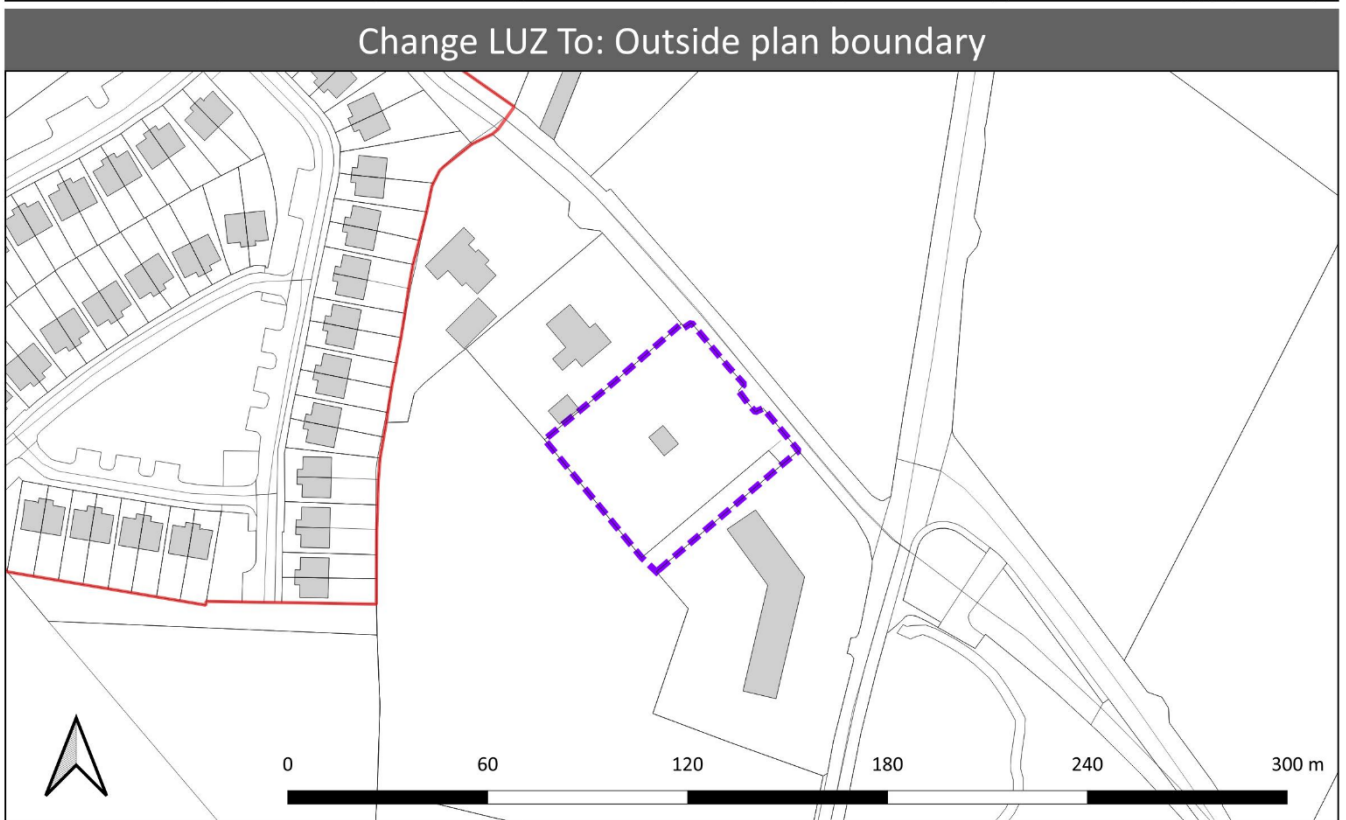
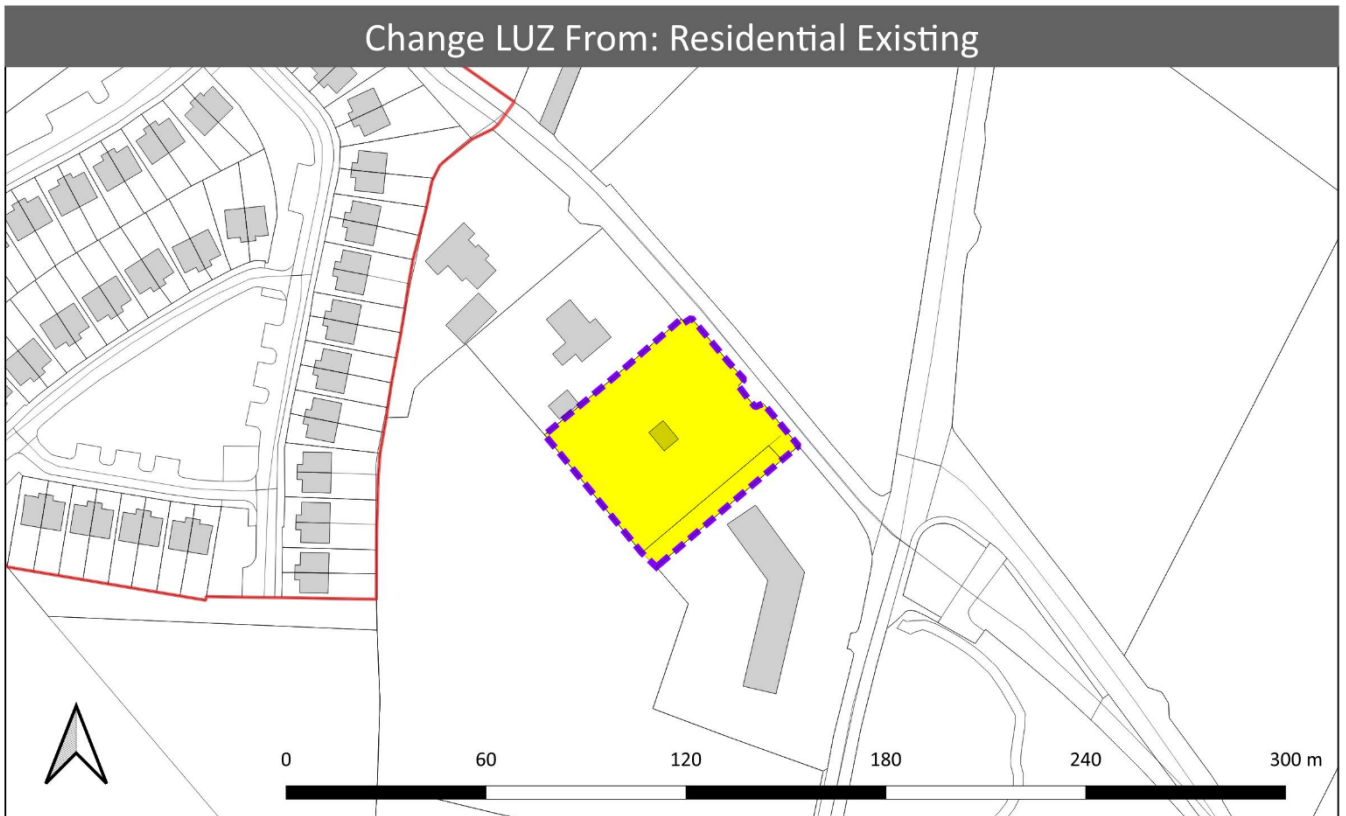
- vi. **MA46:** Revert to the provisions of the Draft Atherny LAP where these lands were not zoned.



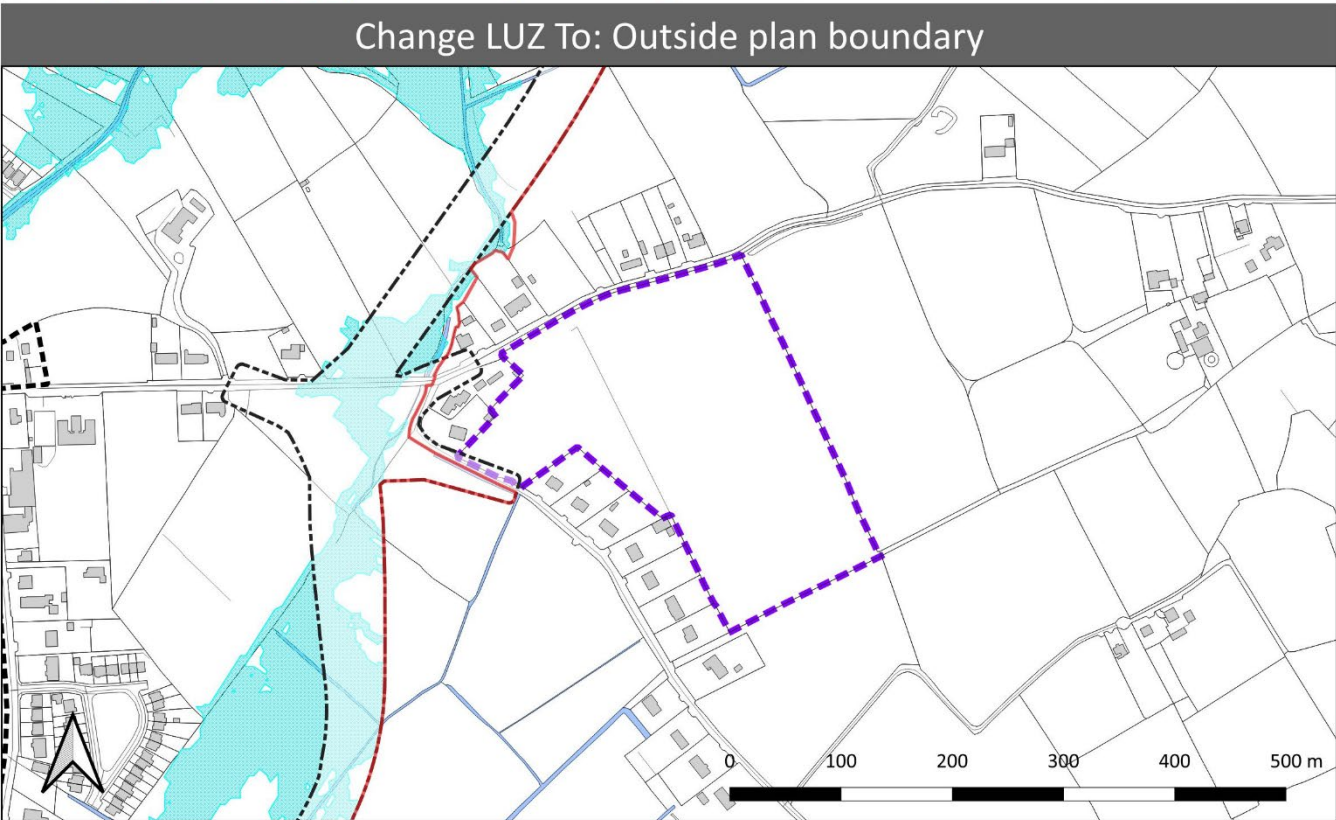
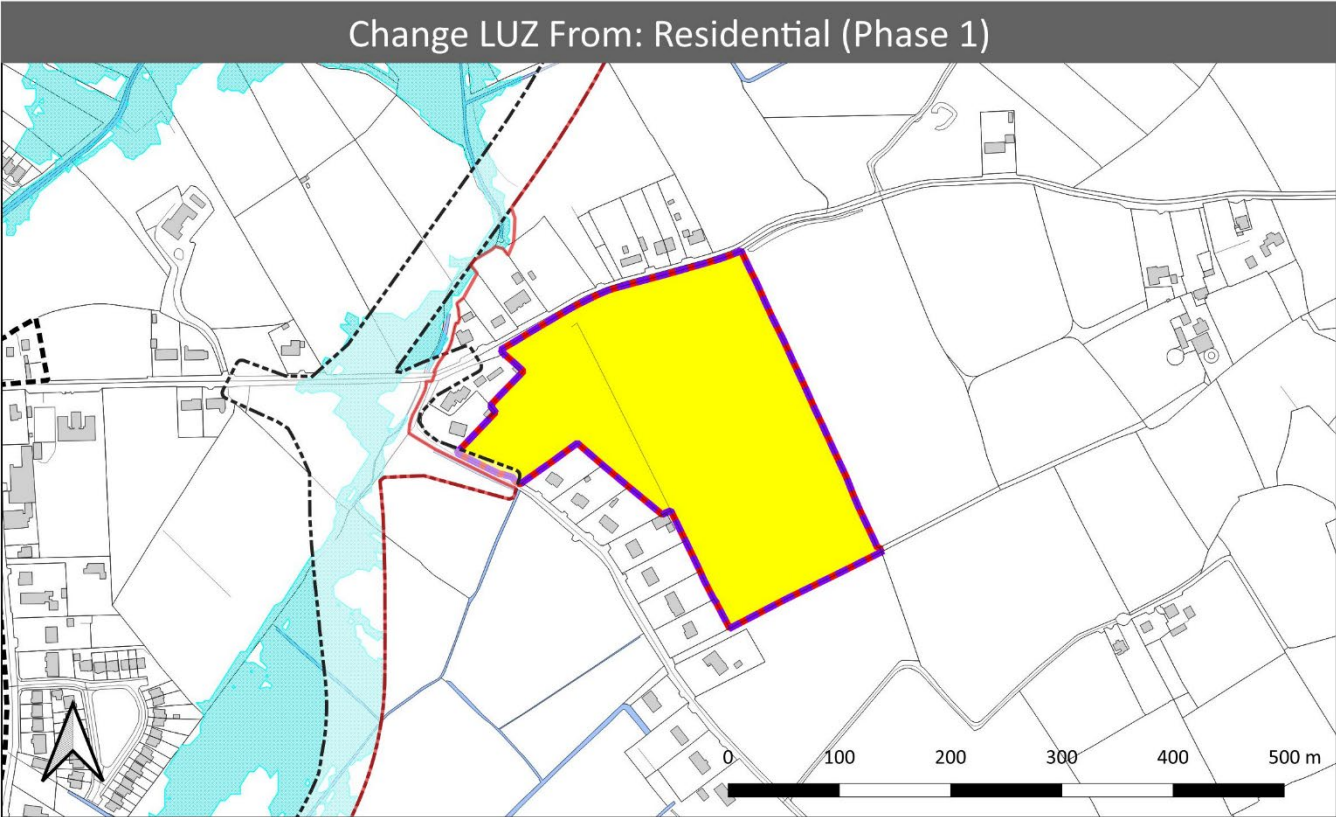
- vii. **MA47:** Revert to the provisions of the Draft Atherny LAP where these lands were not zoned.



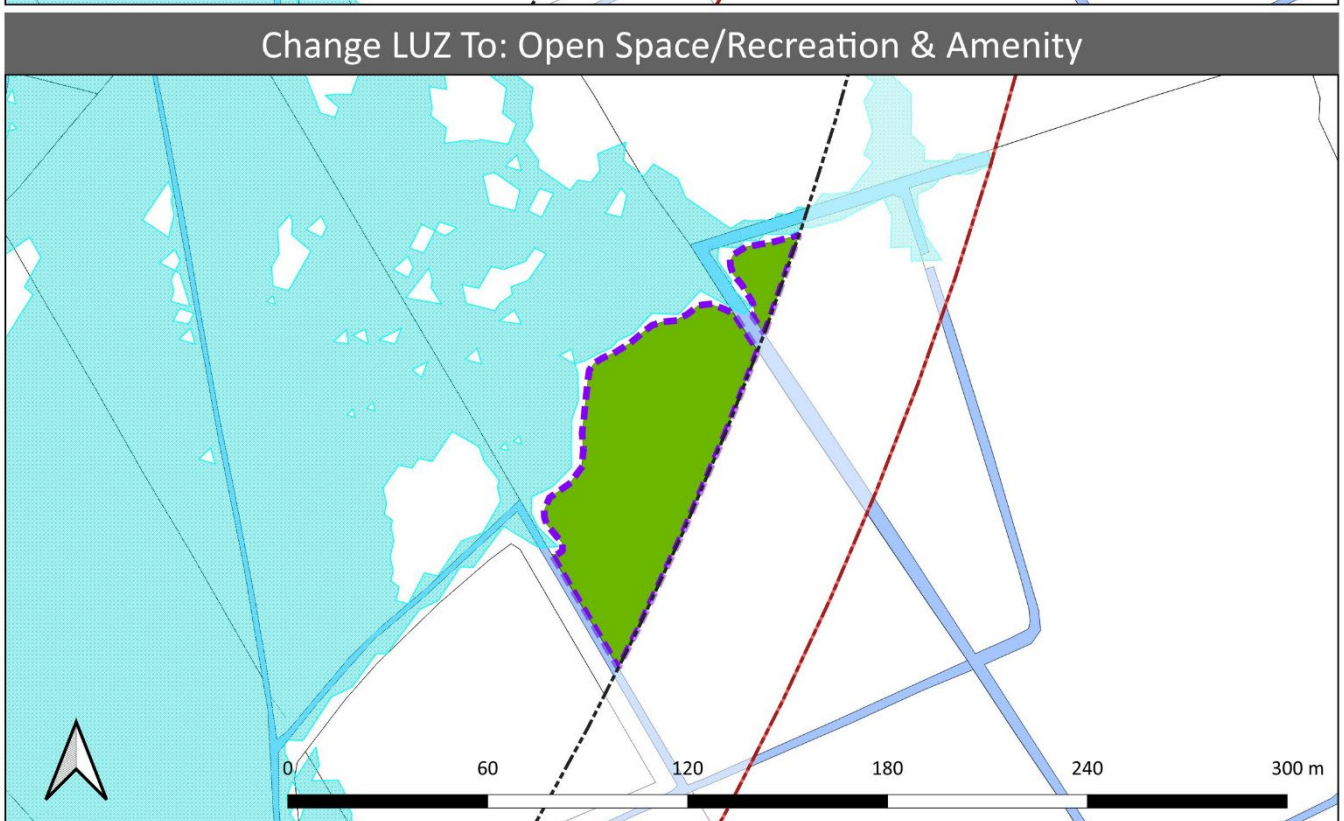
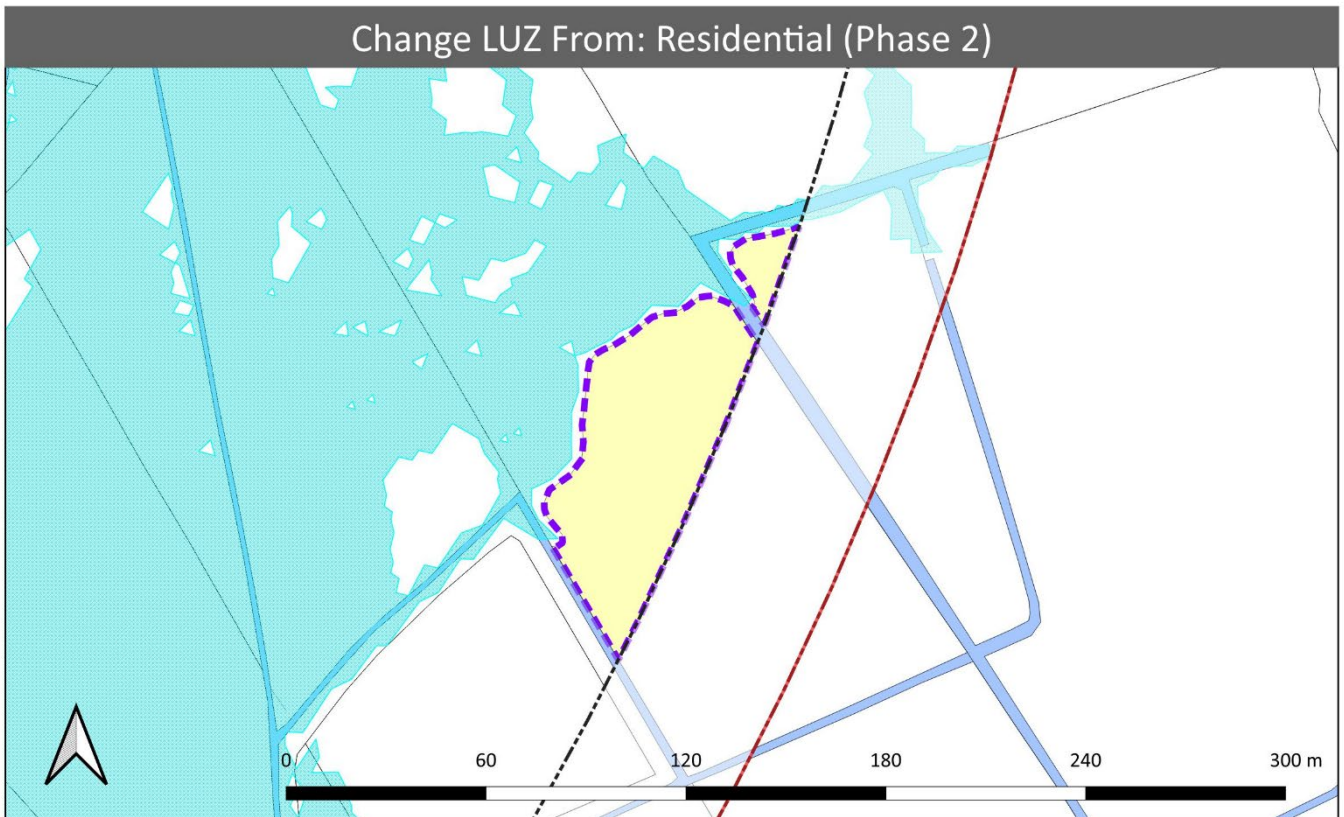
viii. **MA48:** Revert to the provisions of the Draft Athenry LAP where this land was not zoned.



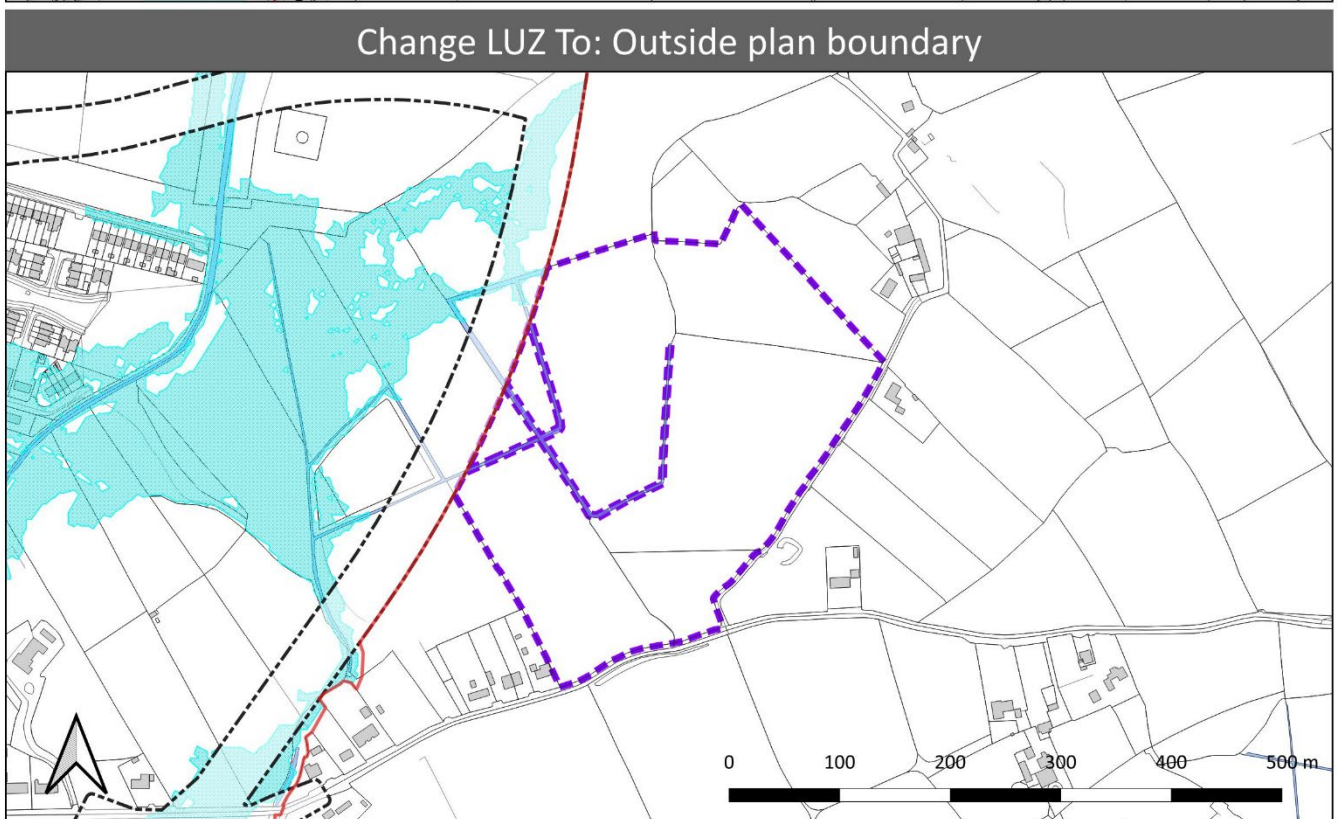
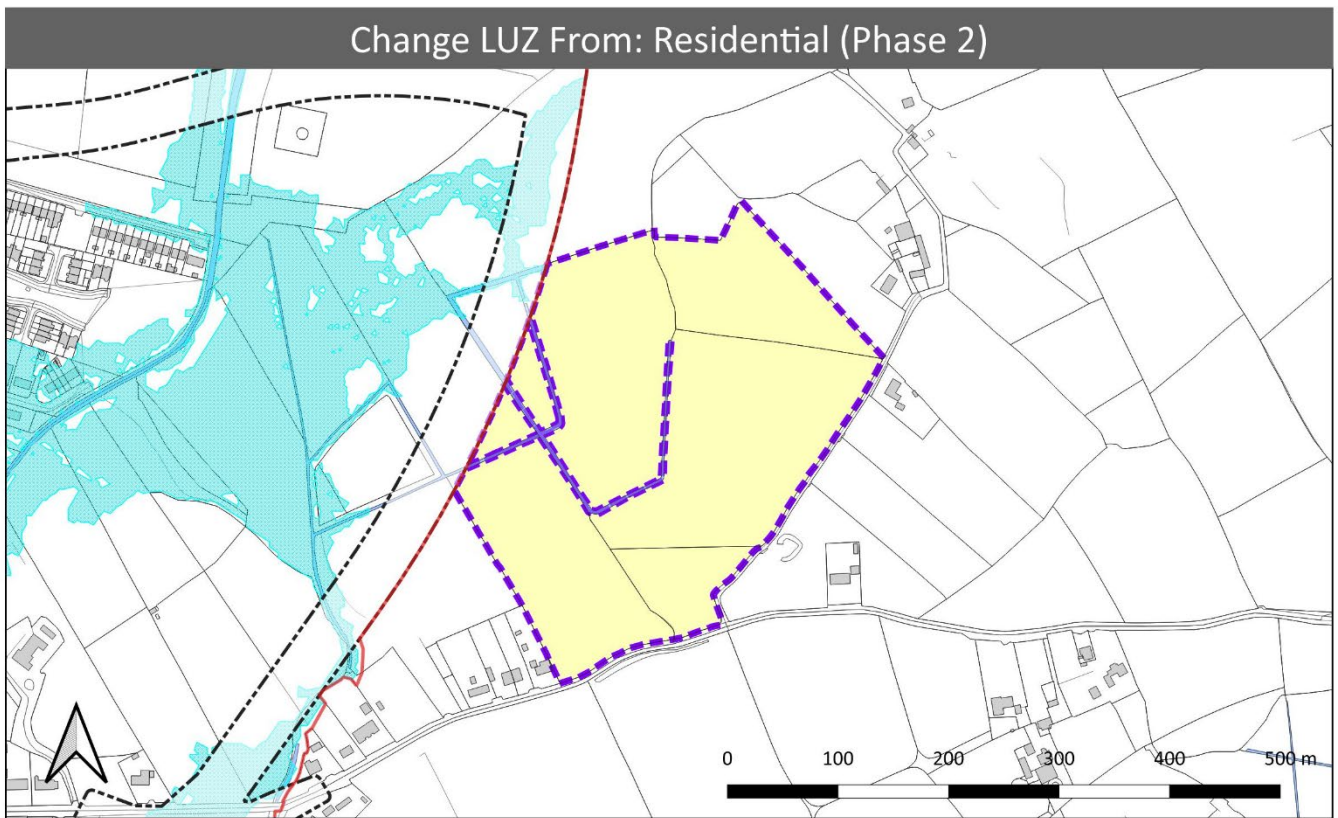
ix. **MA49:** Revert to the provisions of the Draft Athenry LAP where these lands were not zoned.



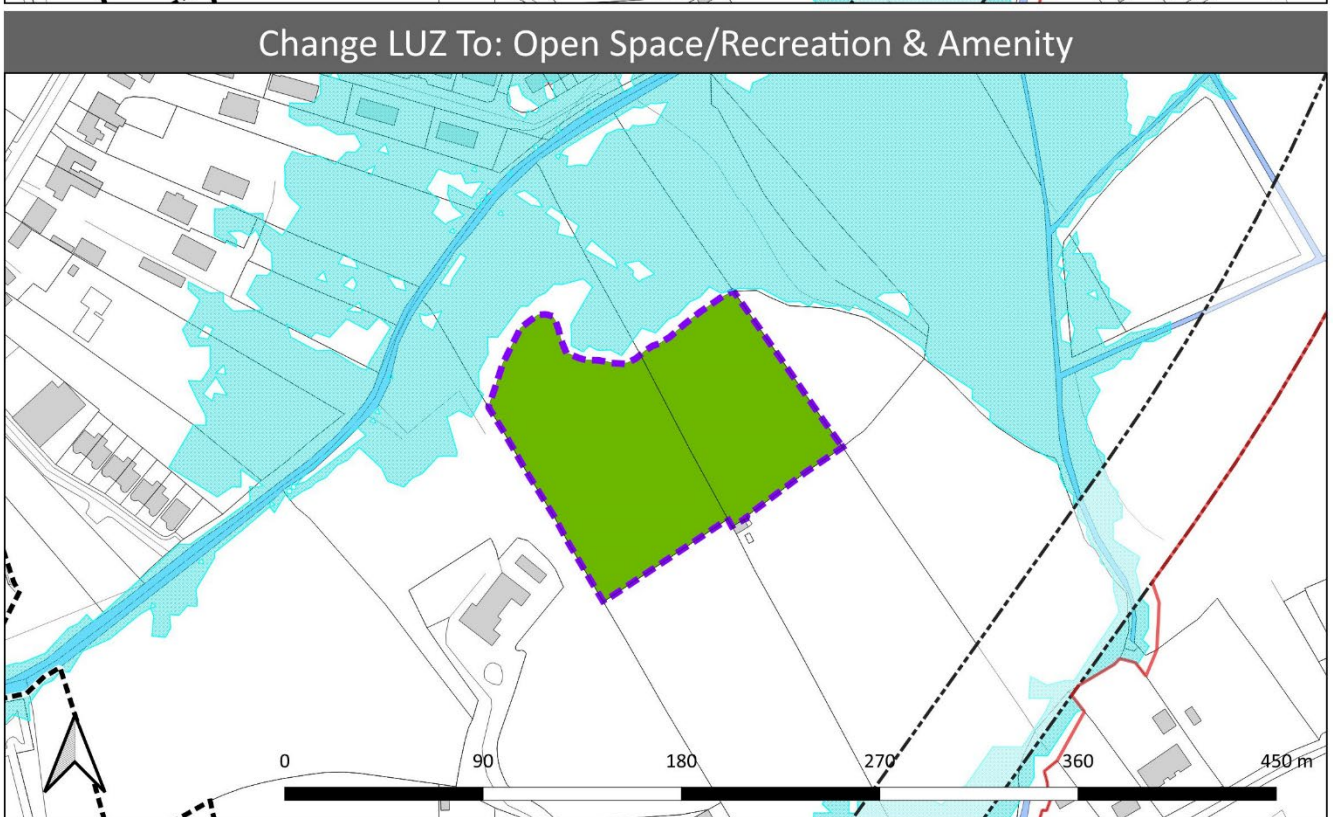
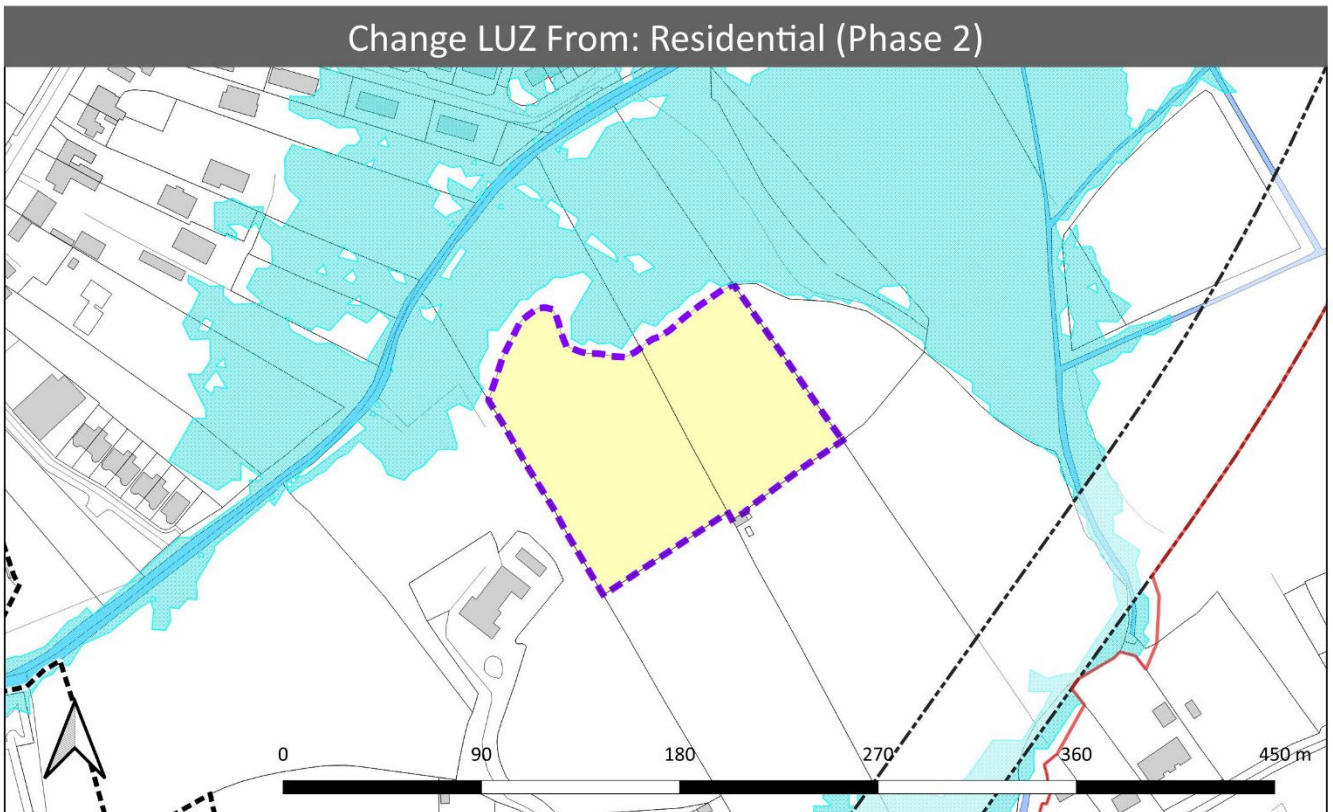
- x. **MA50:** Revert to the provisions of the Draft Athenry LAP where this land was zoned Open Space/Recreation and Amenity.



- xi. **MA51:** Revert to the provisions of the Draft Atherny LAP where these lands were not zoned.

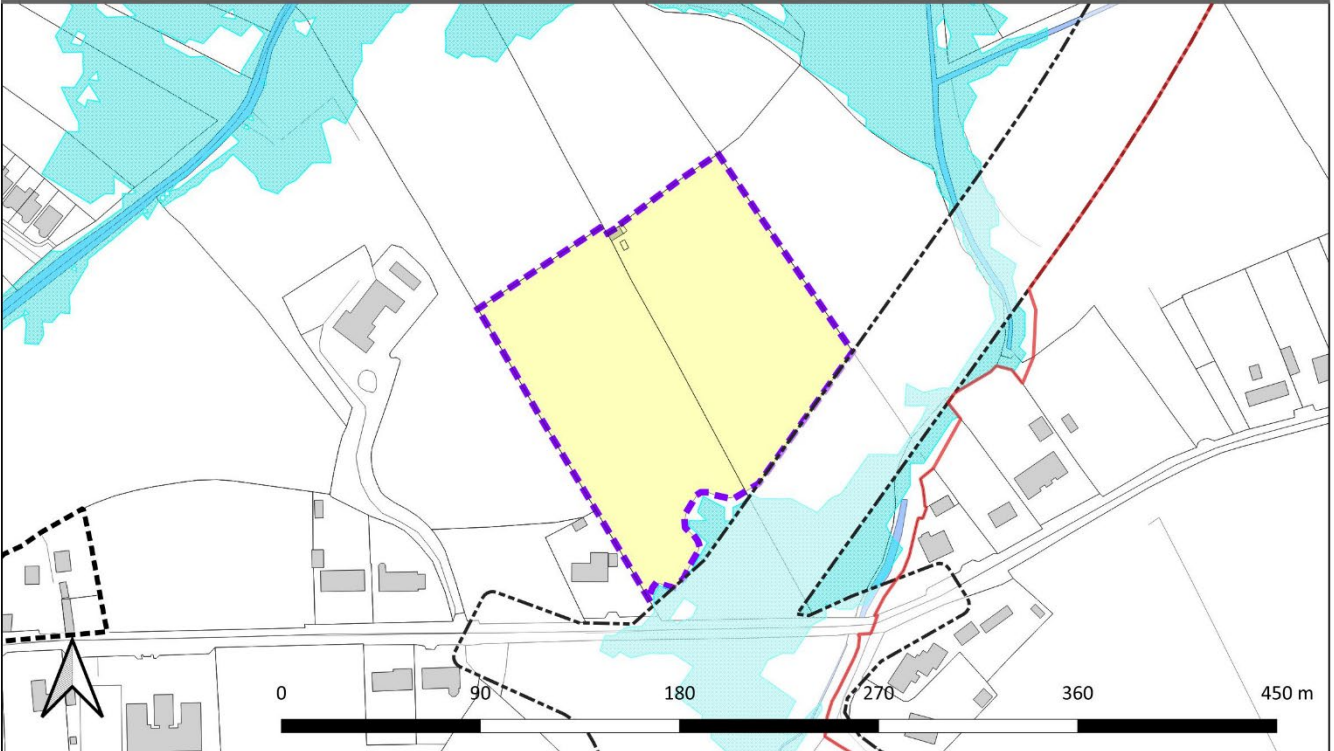


- xii. **MA59:** Revert to the provisions of the Draft Athenry LAP where these lands were zoned Open Space/Recreation and Amenity.

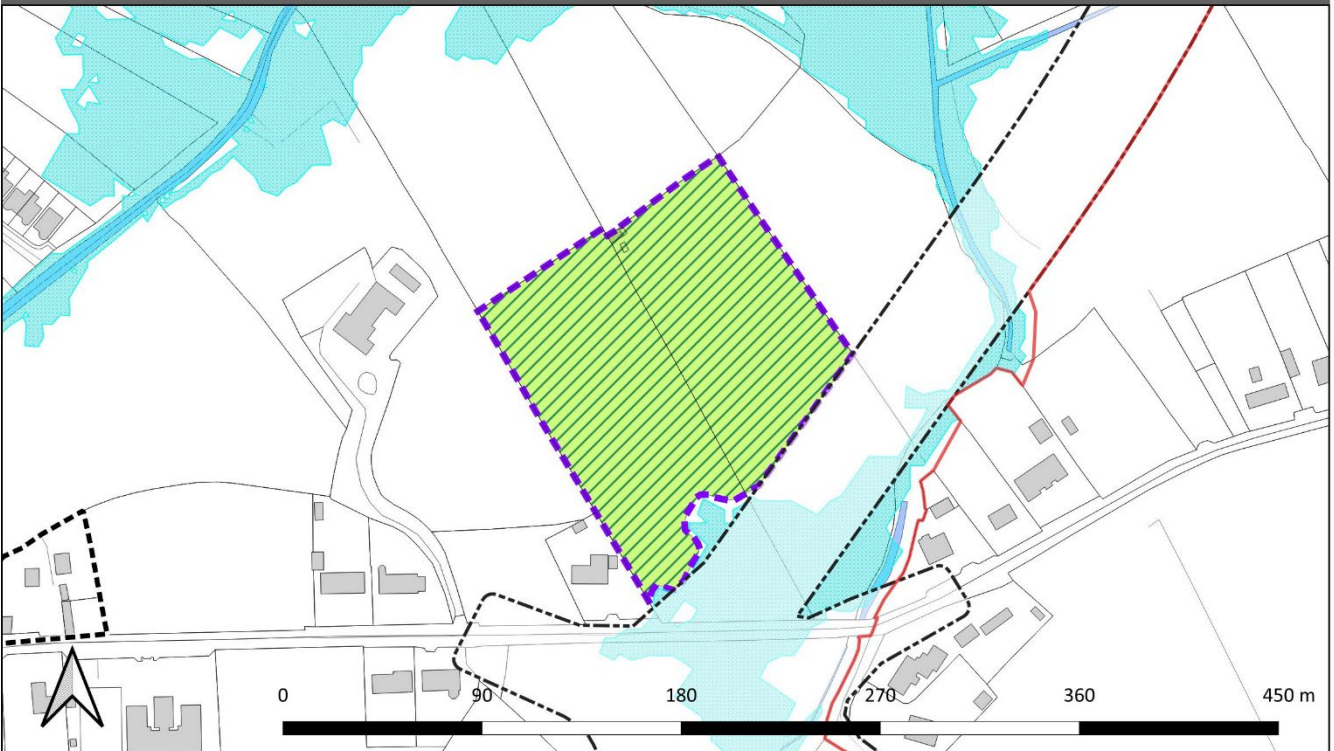


- xiii. **MA60:** Revert to the provisions of the Draft Athenry LAP where these lands were zoned Agriculture.

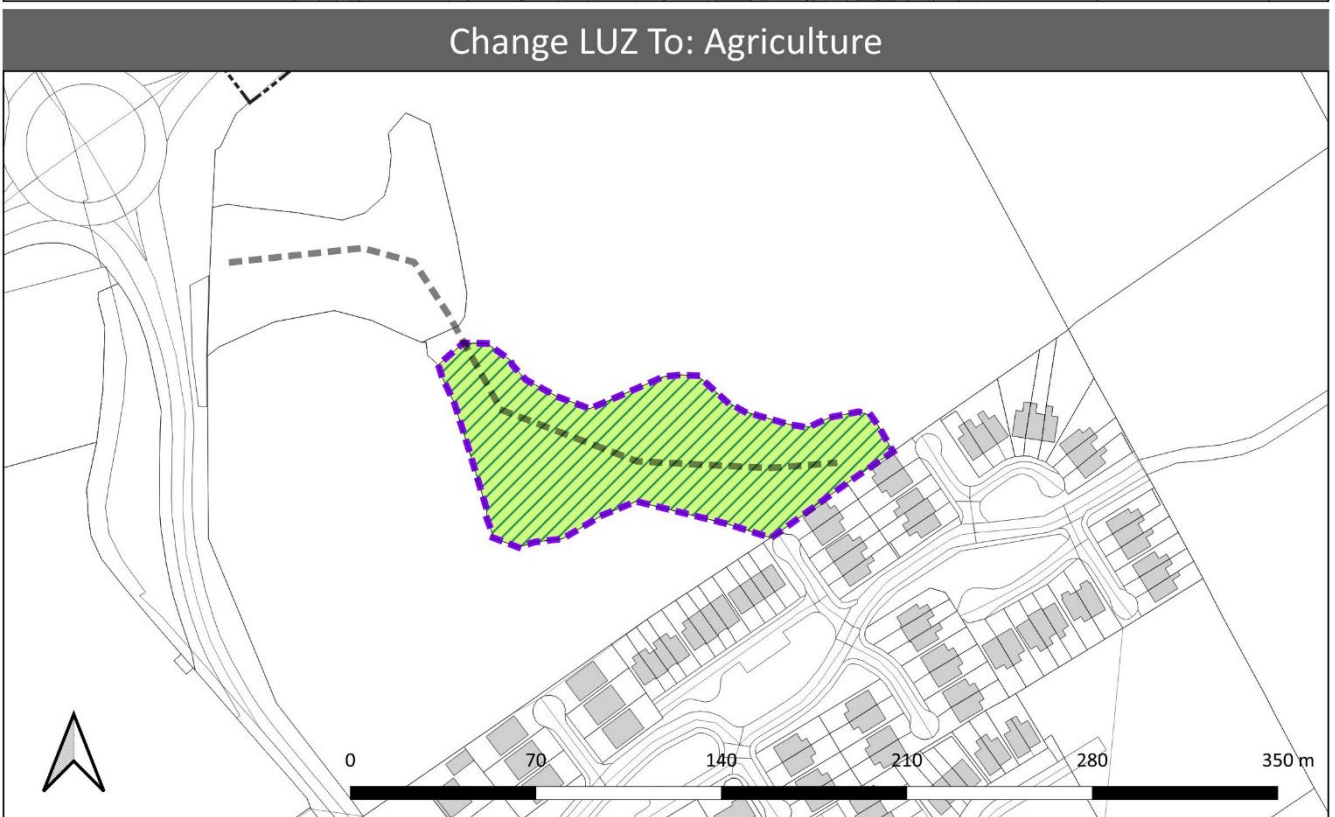
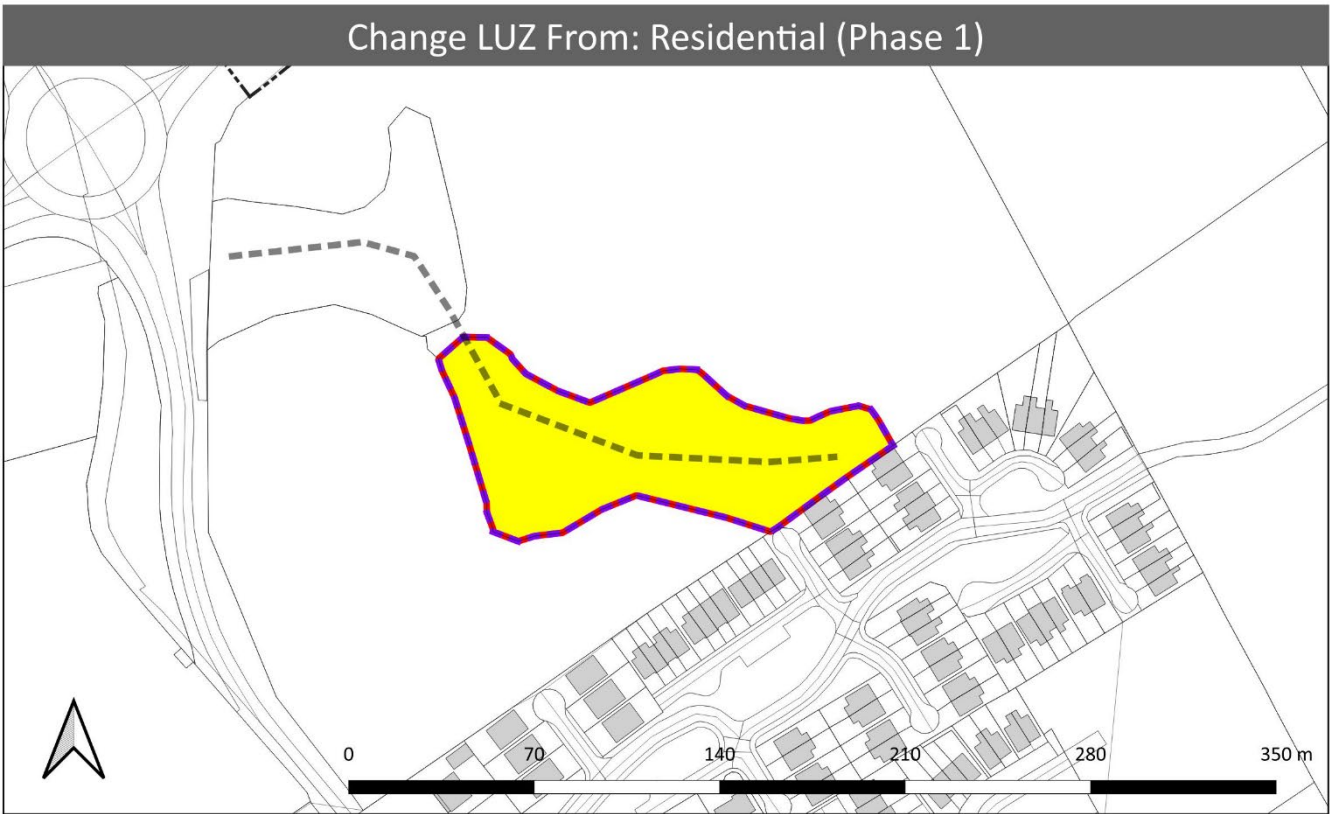
Change LUZ From: Residential (Phase 2)



Change LUZ To: Agriculture



- xiv. **MA65:** Revert to the provisions of the Draft Athenry LAP where this land was zoned Agriculture.



2. Land Use for Employment

The Office, in its submission to the Draft LAP, broadly welcomed the policy objectives with regard to economic development and employment. Furthermore, the OPR acknowledged the RSES and recognises the importance of Athenry as a town of Strategic Potential to be developed along the Economic Corridor identified in the GCDP 2022 - 2028. However, the OPR has concerns with the extensive scale of land zoned for employment uses without an evidence-based rationale to demonstrate the need for such extensive land in accordance with section 6.2.5 of the Development Plan Guidelines. The OPR expressed concern that a significant portion of lands zoned for industry are greenfield undeveloped lands located at the edge of the Draft LAP Settlement Boundary and outside the town CSO Boundary.

The OPR sought an evidence-based rationale for the overall quantity and the spatial location of all employment-generating land use zonings. In this regard, the OPR issued Recommendation 3 in its submission to the Draft LAP. The OPR welcomes the inclusion of MA68 but notes the local authority's decision does not address Recommendation 3.

The OPR notes there are several proposed Material Alterations which result in changes to the lands zoned for employment uses within the Draft LAP. These would further add to the quantum of employment-zoned lands, and the piecemeal nature of the lands zoned for industrial purposes in peripheral locations would not be consistent with a compact pattern of development in accordance with the NSO for compact growth of the NPF.

The OPR has concerns, in relation to the land's situation to the north-west of the town and outside of the relief road, which are subject to Material Alteration MA56, MA58, MA64 and MA55. These Material Alterations are located outside the Settlement Boundary and are identified as Tier 2 in Appendix F Infrastructure Assessment on Employment Lands of the Draft LAP, having regard to their location and need for network connection to wastewater infrastructure. These sites are less sequentially preferable compared to other employment zoned sites in the town. The Development Plans Guidelines advise that the '...proposed employment zonings must have a credible rationale, particularly with regard to location and type of employment'.

MA54 is zoned Business and Enterprise and removed from the town centre and is identified as Tier 2 in Appendix F Infrastructure Assessment on Employment Lands of the Draft LAP, given its inadequate footpath connectivity. It is stated that the lands have no access and are dependent on the delivery of the Part 8 permission for the Relief Road.

The proposed employment land uses zonings referenced above would facilitate new and more intensive employment development removed from the town centre, work against the objectives of consolidation of the existing built urban footprint; conflict with objectives in the Draft LAP to build a much stronger urban core and vibrant town centre; and is contrary to NPO 6, RPO 3.1 and Town Centre First. In this regard, it is not clear that the LAP, with the proposed Material Alterations, contains an overall evidence-based strategy for employment uses which is consistent with the proper planning and sustainable development of the area.

MA Recommendation 2 – Land Use Zoning for Employment Use

Having regard to the provision of an evidence-based strategy for employment uses which is consistent with the proper planning and sustainable development of the area, and in particular 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 National Strategic Objective for compact growth and NPO 74;
- the regeneration of towns under NPO 6 and RPO 3.1 and Town Centre First: A Policy Approach for Irish Towns (2022); and
- NPO 72a-c and Appendix 3 of the NPF for the co-ordination of land use zoning, infrastructure and services,

the planning authority is required to review the following proposed Material Alterations and appropriately reduce the quantity of land required to accommodate employment growth in Athenry:

- (i) MA54 - from Agriculture to Business and Enterprise;
- (ii) MA55 – from Outside the Settlement Boundary to Industrial;
- (iii) MA56 - from Outside the Settlement Boundary to Industrial;
- (iv) MA58 - from Outside the Settlement Boundary to Industrial; and
- (v) MA64 – from Outside the Settlement Boundary to Industrial.

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

- a) provide an evidence-based rationale for the overall quantity and the spatial location of all employment generating land use zonings;
- b) consider all relevant infrastructural capacity in applying the tiered approach to zoning as well as taking realistic account of the impediments to the delivery of infrastructure within the plan period;
- c) omit any lands which cannot be justified under (i) and (ii) above; and
- d) 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.

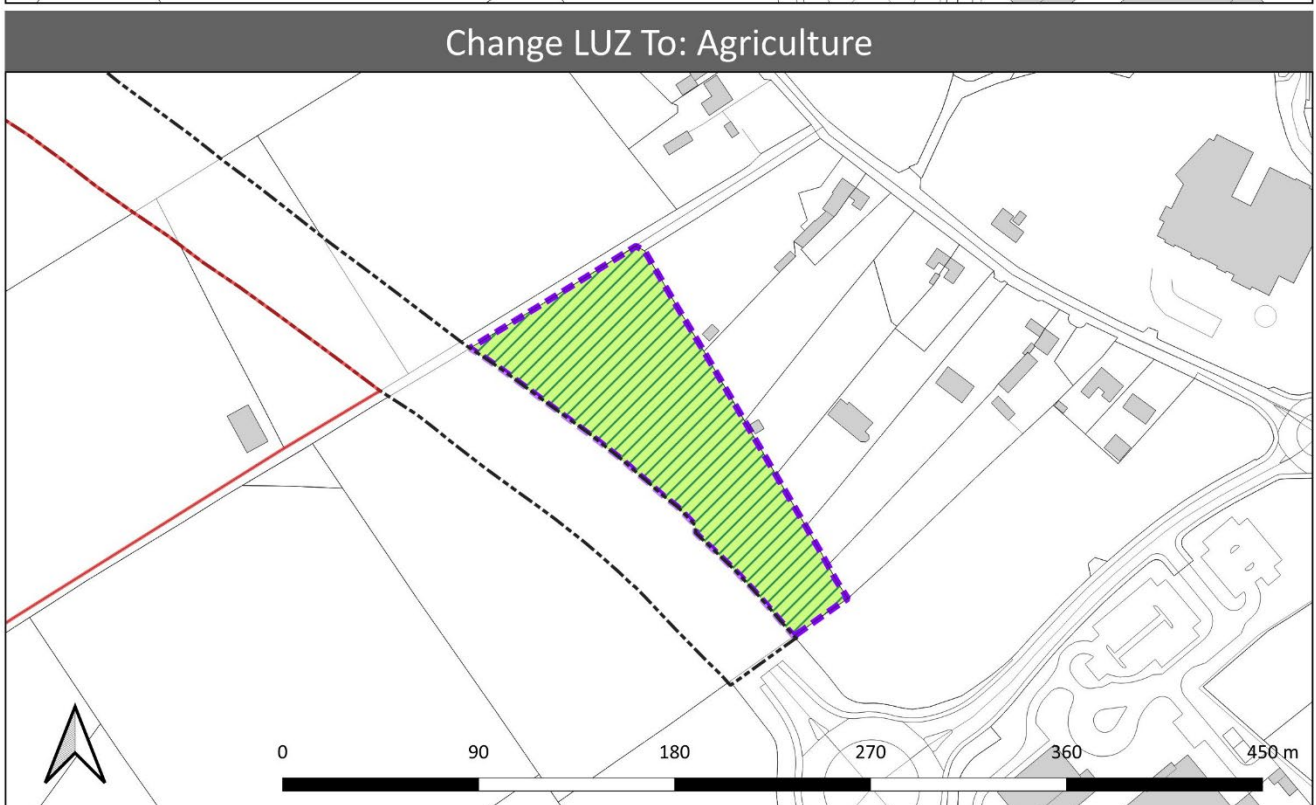
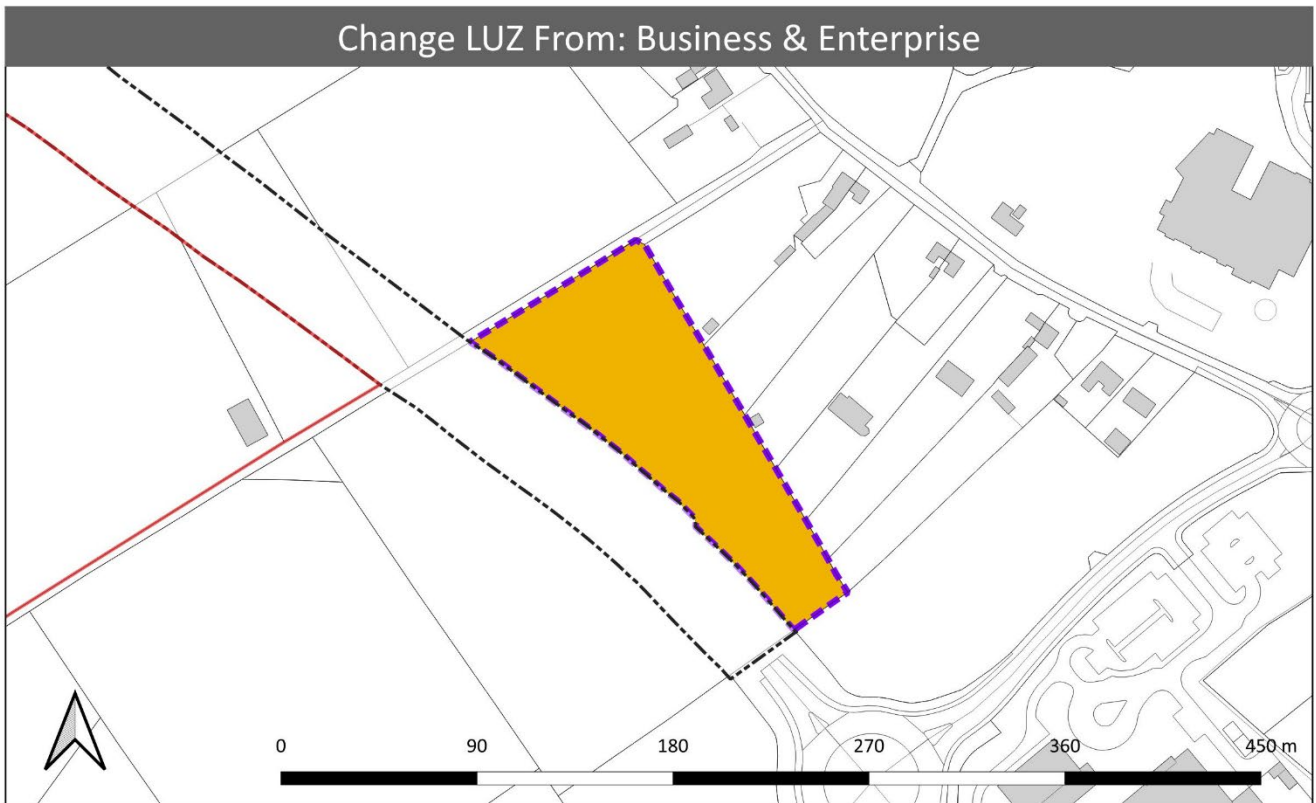
Chief Executive's Response

During the Municipal District meeting, several motions were proposed by the Elected Members specifically relating to Material Alterations referenced above which did not form part of the sequential analysis of lands considered during the preparation of the Draft Athenry LAP 2023 - 2029 due to their location.

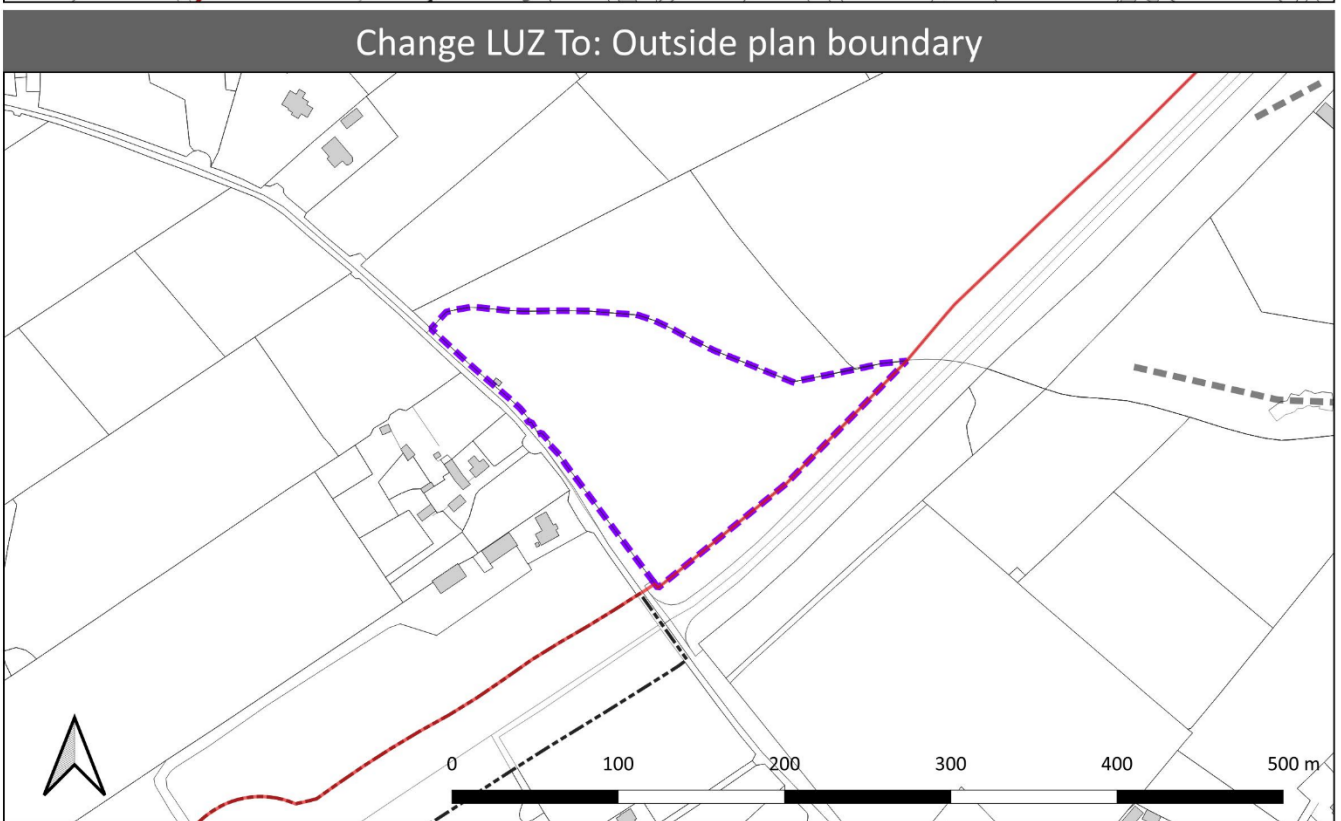
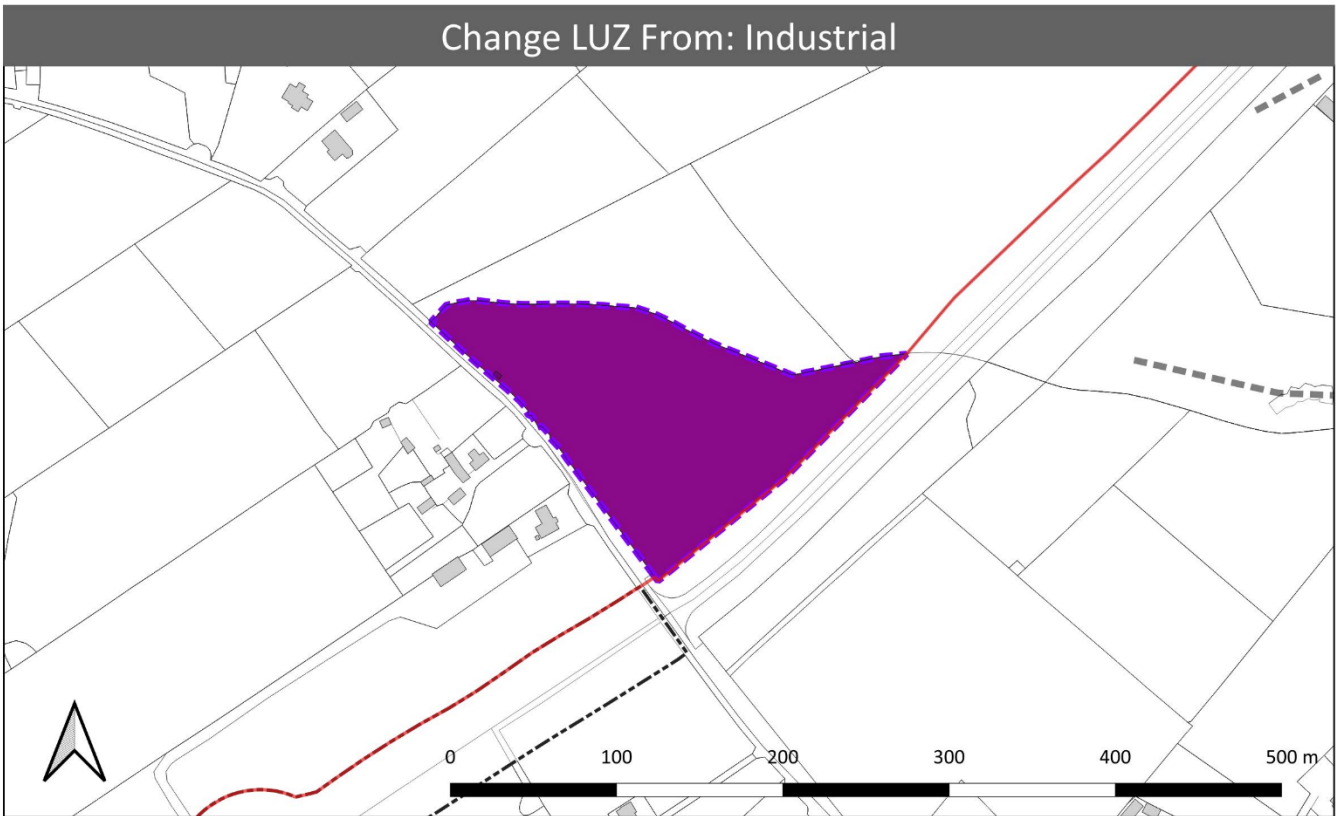
The Planning Authority acknowledge the view of the OPR with regards to Material Alterations MA54, MA55, MA56, MA58 and MA64 and therefore these lands should revert as per the Draft Athenry LAP 2023 - 2029.

Chief Executive's Recommendation

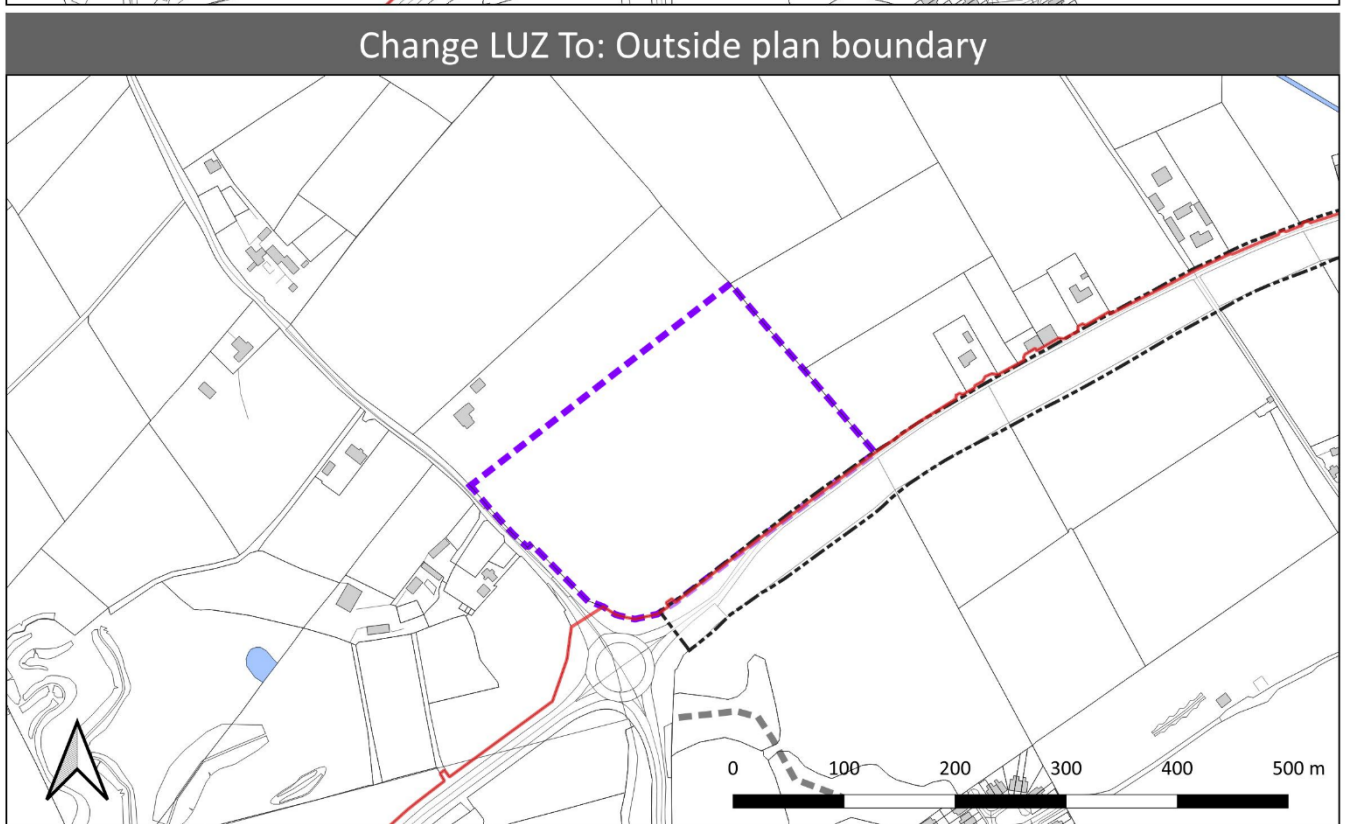
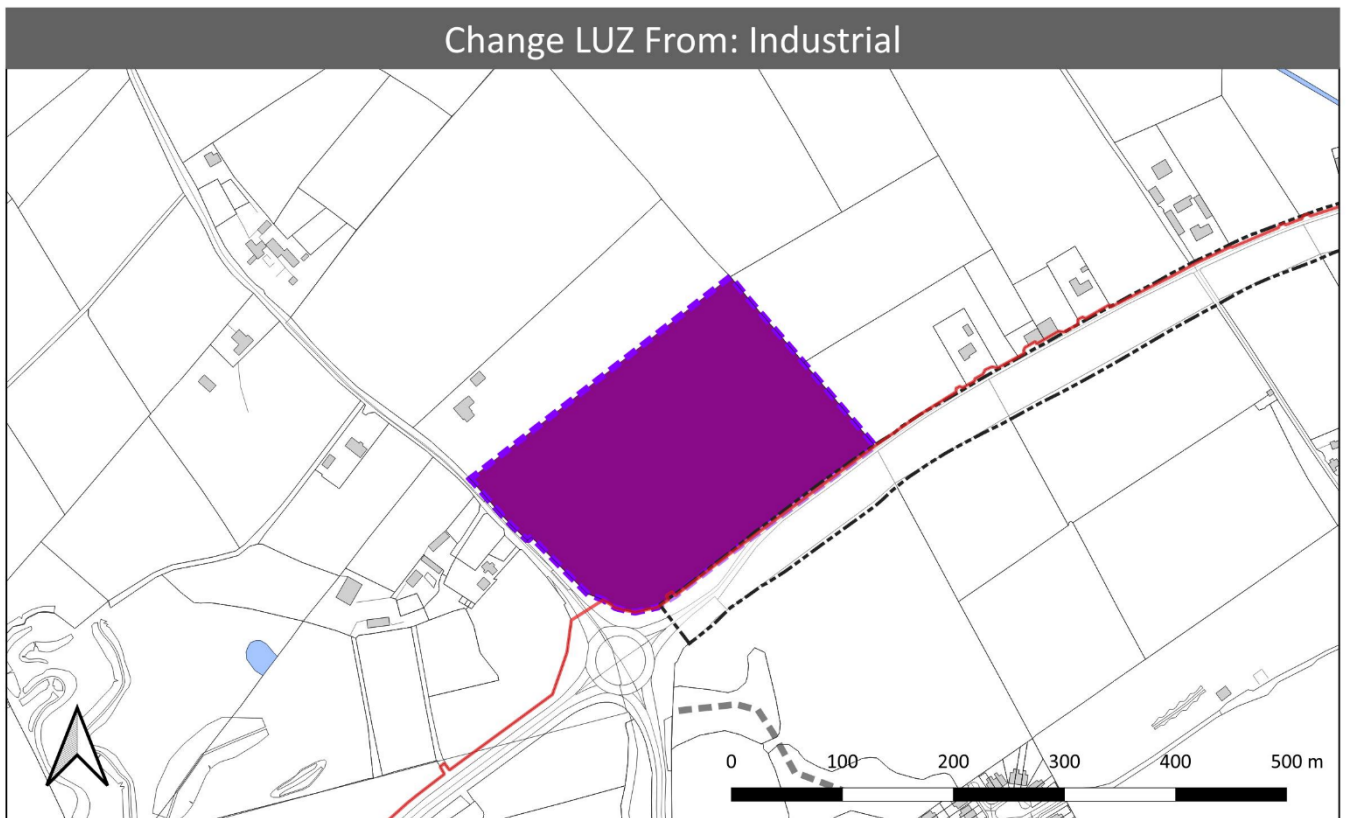
- i. **MA54:** Revert to the provisions of the Draft Athenry LAP where this land was zoned Agriculture.



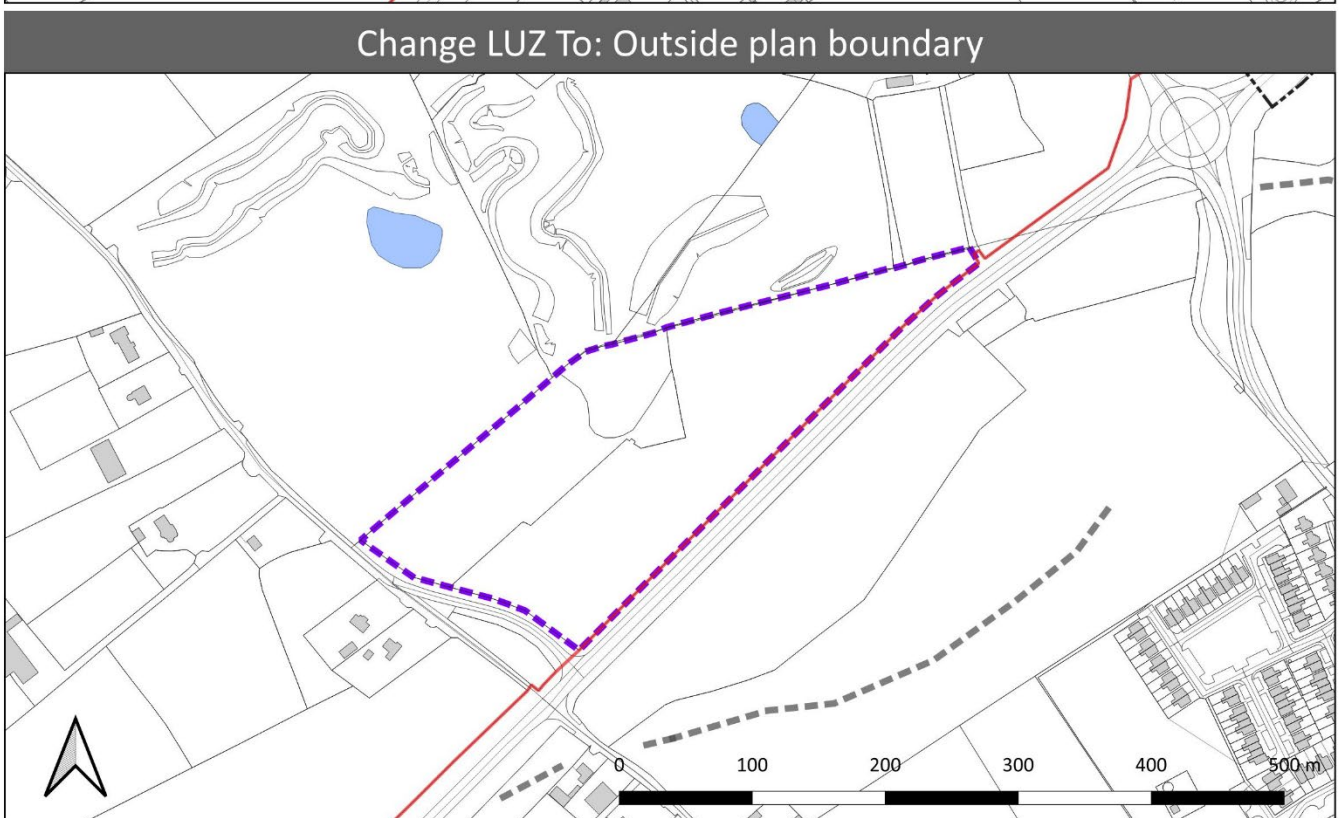
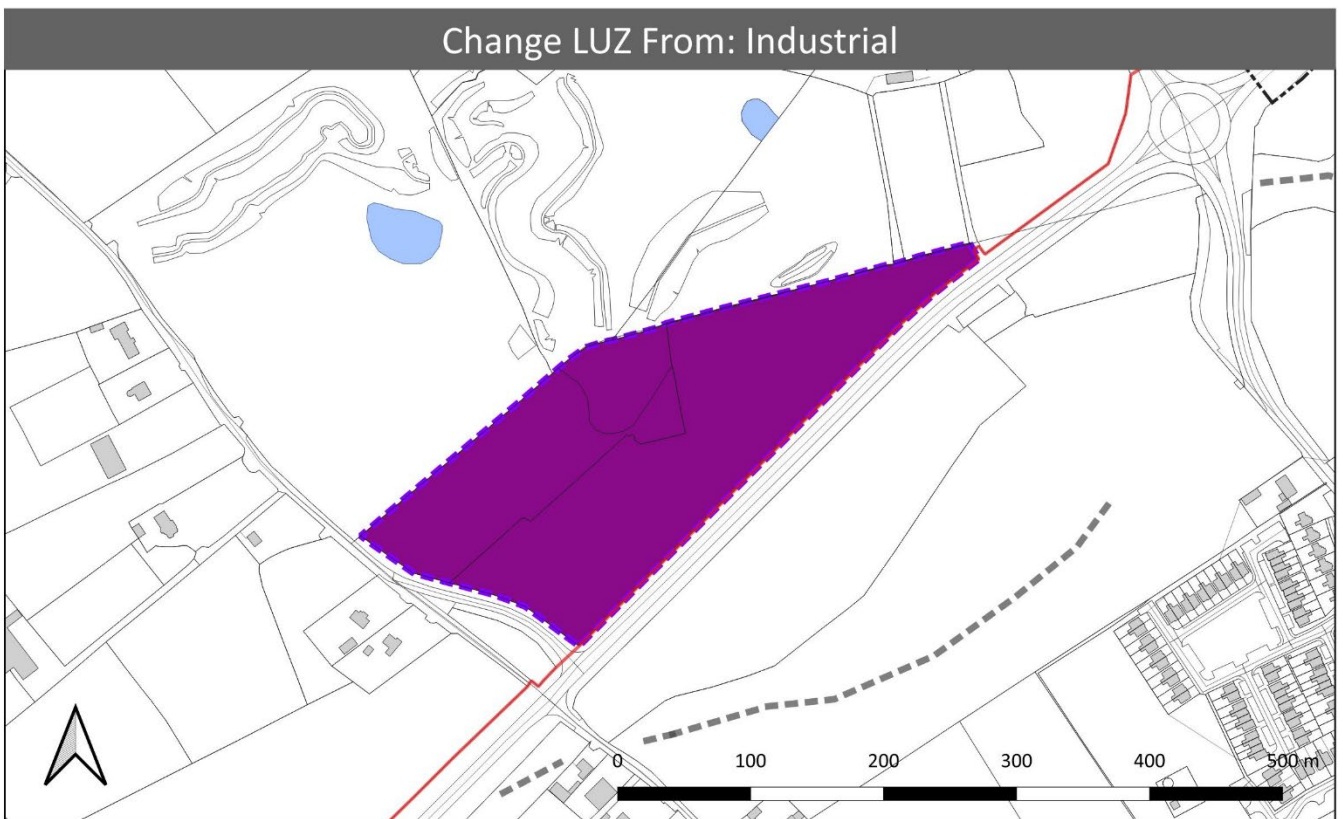
- ii. **MA55:** Revert to the provisions of the Draft Athenry LAP where this land was not zoned.



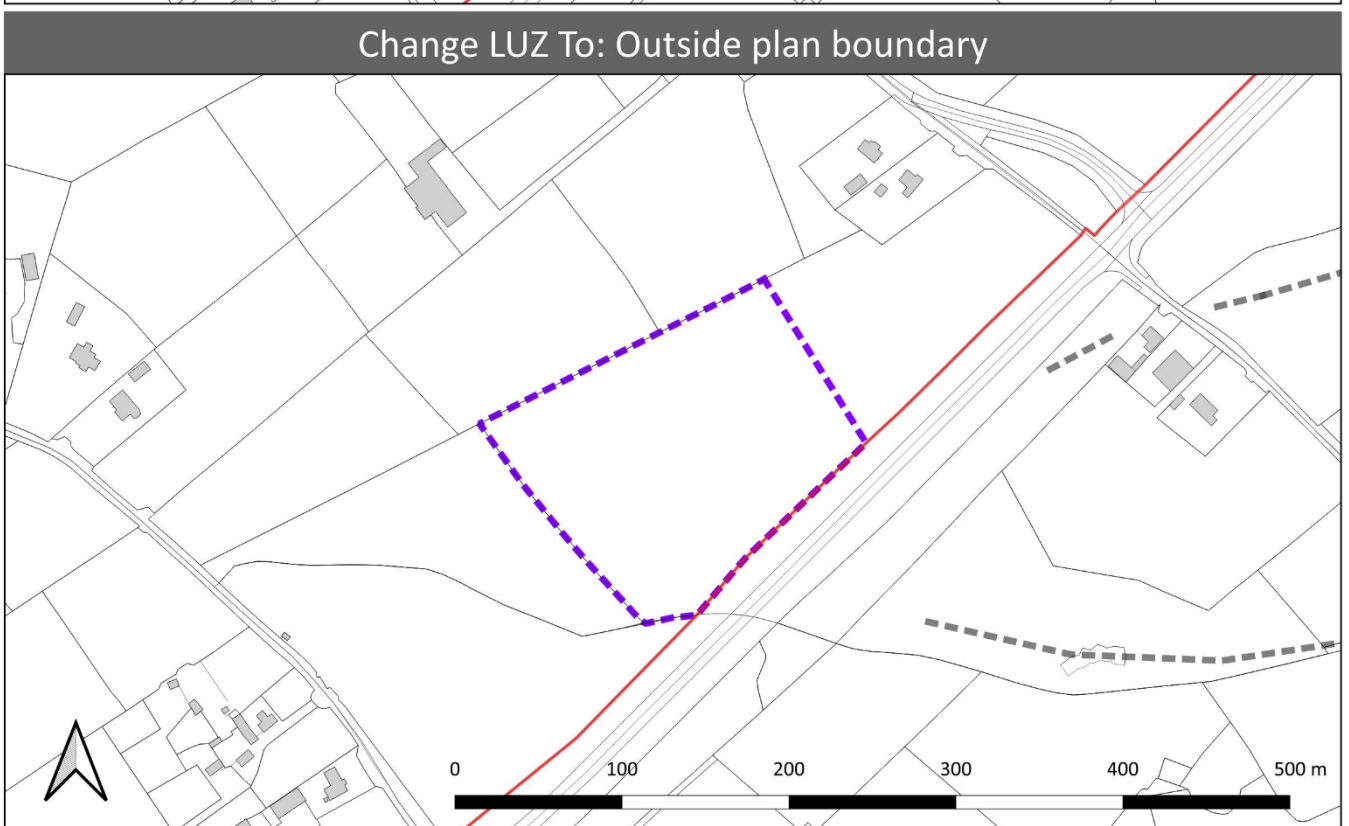
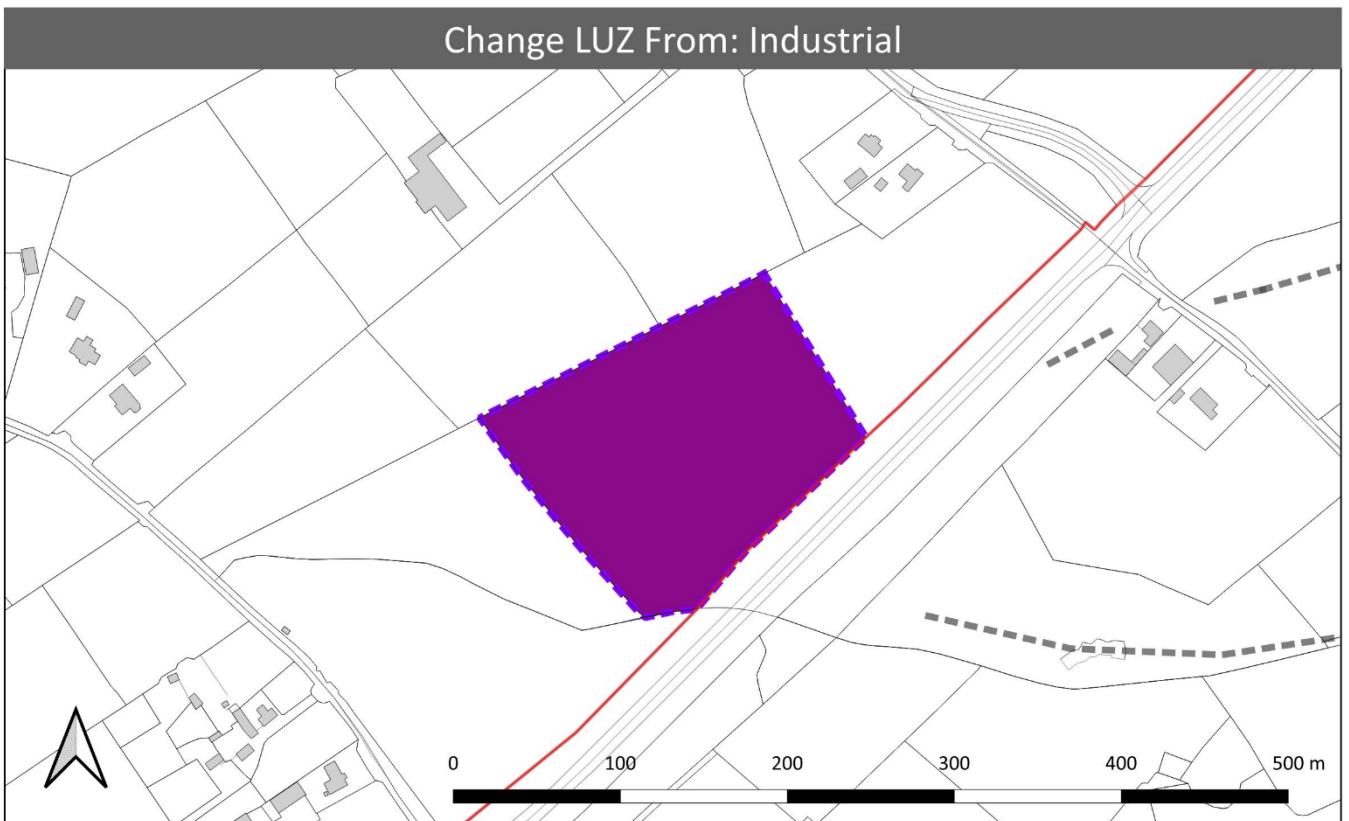
- iii. **MA56:** Revert to the provisions of the Draft Atherny LAP where this land was not zoned.



- iv. **MA58:** Revert to the provisions of the Draft Athenry LAP where these lands were not zoned.



- v. **MA64:** Revert to the provisions of the Draft Athenry LAP where this land was not zoned.



3. Open Space Provision

The OPR generally welcomes the provision of lands zoned Open Space/Recreation & Amenity and the approach taken to education, social and community amenities as part of the Draft LAP. Submission (GLW-C72-2) from the Department of Education is noted, welcoming MA35 to ensure sufficient and appropriate lands are zoned for educational needs.

The OPR notes, the proposed Material Alteration MA37 provides for the zoning of land to Open Space/Recreation & Amenity to the south of the town. However, the purpose or need for the proposed zoning is unclear. As previously discussed, in relation to proposed Material Alteration MA5, MA47 and MA48 there are several issues in this area of the town relating to access and pedestrian facilities. The OPR notes it is important that lands are open to the public and are accessible using walking and cycling infrastructure rather than facilitating a pattern of car-dependent development. Such an approach would be inconsistent with the Draft LAP objectives to promote sustainable settlement and transportation strategies and contrary to the intention of NSO 1 of the NPF for compact and connected settlements. The proposed Material Alteration including the amended LTP, provides no details as to how these lands will be accessed. Therefore, the OPR considers the Planning Authority should provide clarification as to the future uses of the land regarding, how it will be connected to the town in a sustainable manner and its suitability having regard to the issues raised above.

MA Observation 1 – Open Space Provision

The planning authority, in accordance with NSO 1 of the NPF, is requested to provide clarification as to the future intended use of the lands at proposed Material Alteration MA37, and to demonstrate how these lands will be accessible using active travel measures. If this is not possible, the planning authority is advised to consider making the LAP without Material Alteration MA37 (Outside Settlement Boundary to Open Space/Recreation & Amenity).

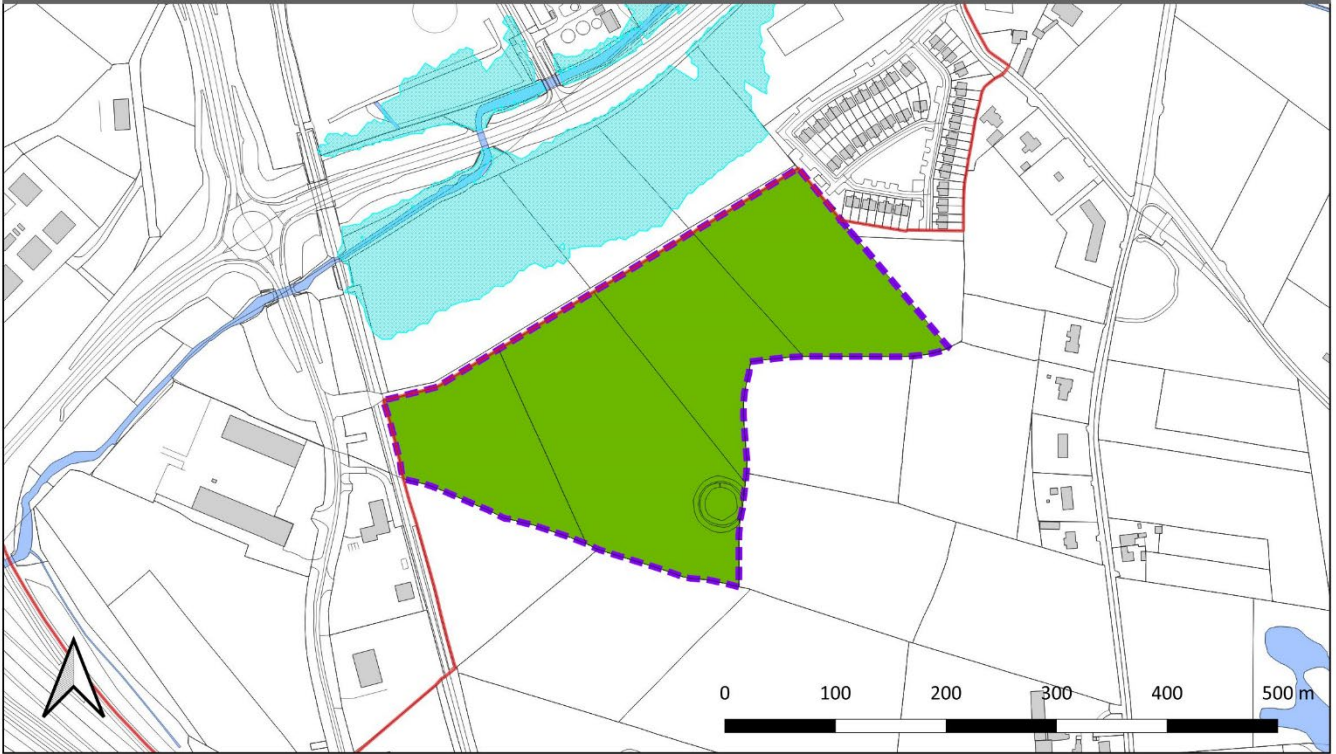
Chief Executive's Response

The contents of the submission are noted. The zoning of lands for Open Space/Recreation and Amenity are generally welcomed in settlement plans however in this instance there is limited access arrangements. The Planning Authority accepts the view of the OPR in regard to Material Alteration MA37 and it is considered that this Material Alteration does not comply with NSO 1 and is not consistent with the NPF.

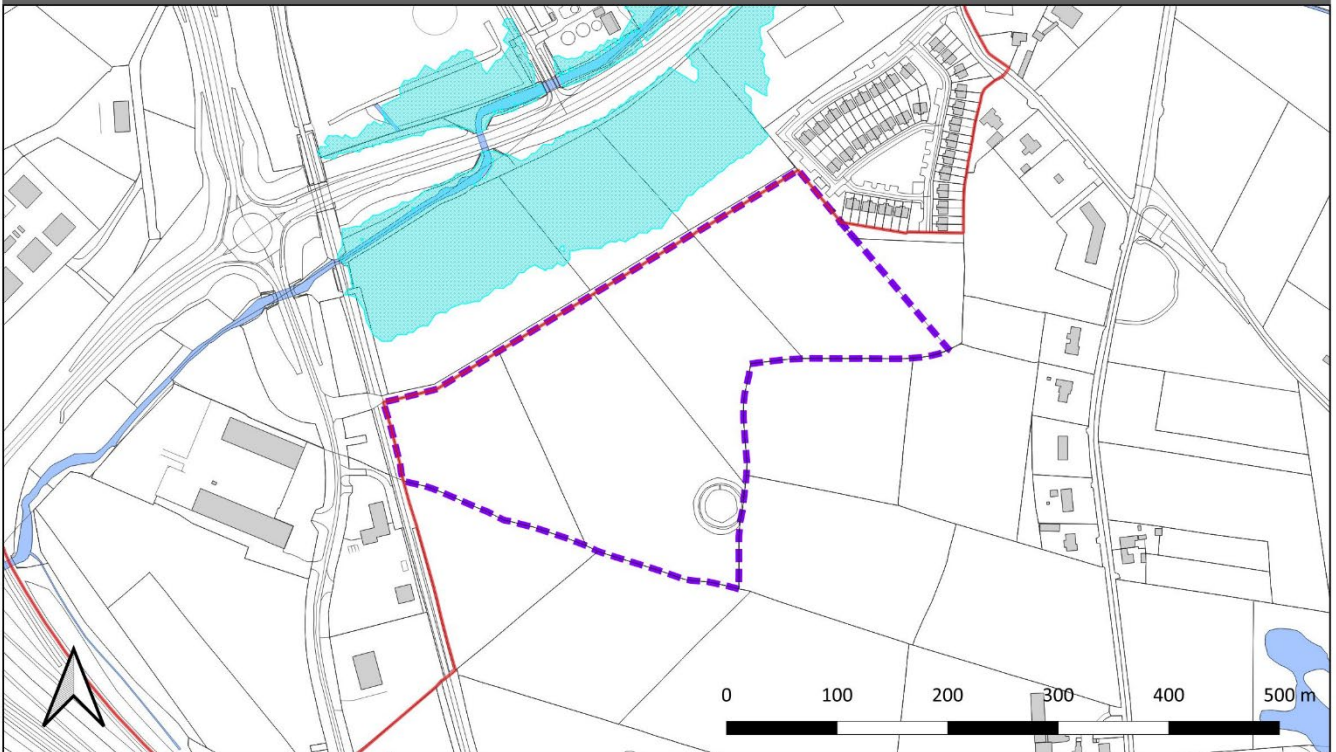
Chief Executive's Recommendation

- i. **MA37:** Revert to the provisions of the Draft Athenry LAP where these lands were not zoned.

Change LUZ From: Open Space/Recreation & Amenity



Change LUZ To: Outside plan boundary



4. Flood Risk Management

The OPR has expressed concern with regard to the extent of the Flood Risk in the Furzypark area. The OPW submission to the proposed Material Alteration expresses concern that while the inclusion of MA13 is welcomed, this Material Alteration does not account for the full extent of the flood risk area. The Planning Authority are therefore required to review this and take appropriate action. The OPR have concerns that this flood risk area could affect land zoned Industrial in the Draft LAP and adjacent lands which are proposed to be zoned as part of MA33.

The OPR notes former lands were subject to Recommendation 2 of the OPR submission to the Draft LAP to avoid inappropriate zoning of lands at risk of flooding and should be reviewed by the Planning Authority. In relation to the Material Alteration MA33 lands, the OPR is concerned that lands that are subject to flood risk have similarly been zoned contrary to the Flood Guidelines and NPO 57. The OPR considers that the Planning Authority should engage with the OPW to assess whether the flood risk extent at Furzy Park is correct and if any further changes are required.

MA Recommendation 3 – Flood Risk Management

Having regard to flood risk management, and in particular to the following:

- National Policy Objective 57; and
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines),

the planning authority is required to:

- (i) review the Strategic Flood Risk Assessment for the Furzypark area of Athenry to ensure that the flood risk extents proposed as part of Material Alteration MA13 are consistent with the relevant flood maps prepared by the OPW and other agencies;
- (ii) ensure that any flood risk associated with this area is assessed in accordance with the application of the sequential approach and the Justification Test where appropriate, and having regard to potential climate change effects and potential impact on adjoining vulnerable uses; and
- (iii) consider potential remedies for this matter at this stage of the local area plan making process which may include omitting or amending zonings that do not meet the Justification Test in accordance with the provisions of the aforementioned Flood Guidelines.

The planning authority should consult with the OPW regarding the Recommendation.

Chief Executive's Response

See Chief Executives Response to GLW-C72-8 in relation to the OPW Submission.

Chief Executive's Recommendation

See Chief Executives Recommendation to GLW-C72-8 in relation to the OPW Submission.

Prescribed Authorities

Submission No.	Submission Name	Summary of Issues Raised in Submission	Chief Executive's Response
GLW-C72-24	Uisce Éireann	<p>A comprehensive submission was received from Uisce Éireann. There is broad welcome for the inclusion of the proposed Material Alterations based on the consideration of the initial submission (GLW-C60-127).</p> <p>MA's amending Land Use Zonings:</p> <p>It is stated that available network information indicates that network extensions maybe required to service zoned sites.</p> <p>It is stated that depending on the extent of development realised localised networks upgrades may be required particularly in areas where areas served by 150mm diameter sewers or watermains with a diameter of 80mm or less. It is stated that third party agreement would be required where it is proposed to service new sites.</p> <p>It is stated that there is a significant increase in the amount of residential land including Residential Phase 1 and Phase 2 Lands.</p>	<p>Chief Executive's Response Submission noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

		<p>The following are site specific comments in relation to a number of Material Alterations</p> <p>MA3 This site is an extension to the north of an area that was already zoned for phase 1 residential. Foul sewer is available to the east of the site in the adjacent estate and in the Cluain Lara estate, third party permissions may be required. There is a 80 mm water supply pipe that could serve this site from Raheen Road, though this is likely to require an upgrade.</p> <p>MA5 and MA47 These two sites are adjacent to each other and are considered together. Uisce Éireann is in the process of upgrading the sewer system at Athenry and new rising main is being installed in Pairc na hAbhainn with an associated pumping station. Any new development in this area would connect into this new system, connection could be via the Páirc na hAbhainn estate or via the public road with a network extension. Connection to the water network could be via the adjacent estate or along the adjoining roads, localized upgrades may be required. Third party permissions may be required.</p> <p>MA22 Available GIS indicates a 100mm private water supply pipe runs within this site. Sewer and water network is available 50m west of this site.</p>	<p>The Material Alteration was proposed and is in accordance with the Core Strategy Allocation of the GCDP 2022 - 2028.</p> <p>Noted. See Chief Executives Response to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</p> <p>Noted.</p>
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		<p>MA24 and MA65</p> <p>This site connects on to the Garrai Glas estate which according to UÉ GIS mapping does not have a public sewer network, a developer may be able to connect into private networks within this estate, third party permissions and localized upgrades may be required. Local knowledge may provide greater clarity with regard to the extents of the public network. Alternatively, water supply and public sewer networks are available in Garrai Glas Park and via the adjoining Phase 1 zoned sites and extension to the public networks on the R347.</p> <p>MA25</p> <p>Estate is currently served by a private sewer network and Developer Provided Infrastructure, connection of the estate to the public network would be subject to connection agreement. Available GIS indicates public water and sewer networks are available in the adjacent Garrai Glas estate and in the public road at the entrance to the estate.</p> <p>MA32</p> <p>A 300mm trunk watermain is within/ immediately adjacent to the north-west stretch of land and must be protected.</p>	<p>Noted. See Chief Executives Response to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</p> <p>Noted.</p> <p>Noted.</p>
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		<p>MA39 There is a substantial amount of land that is designated as Residential Phase 1 and it is unclear why this site needs to be brought forward from Phase 2. An extension (ca. 250m) would be required to connect to the new sewer under construction to the west. Localised water network upgrades may be required.</p> <p>MA40, MA41 and MA42 (considered as one) There is a substantial amount of land that is designated as Residential Phase 1 and it is unclear why these sites need to be brought forward from Phase 2. New sewer under construction in the road adjoining the western boundary of the site. Watermains available in the road to the north, localized upgrades may be required.</p> <p>MA43 New sewer under construction in the road adjoining the eastern boundary. Extension of approx. 100m may be required to connect to the water distribution network.</p> <p>MA46 and MA49 Together these areas will extend residential development beyond the existing settlement boundary to the east of the new road. Water supply could be obtained from a</p>	<p>The Material Alteration was proposed due to a reconfiguration of Residential Phase 1 lands. However due to the connectivity issues at this location it is considered that these lands should revert to Residential Phase 2 as per the Draft Atherry LAP 2023 – 2029 and subsequently MA38 should revert to Residential Phase 1 as per the Draft Atherry LAP 2023 – 2029.</p> <p>Noted. See Chief Executives Response to GLW-C72-25 in relation to MA40 and MA41 and Recommendation 1 of the OPR Submission.</p> <p>In relation to MA42 and taken into account the OPR submission and Chief Response and Recommendation the Planning Authority considers it appropriate that MA42 revert to the zoning of the Draft Atherry LAP 2023 – 2029 (Existing Residential).</p> <p>Noted. See Chief Executives Response to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</p> <p>Noted. See Chief Executives Response to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</p>
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		<p>80mm pipe within the highway to the north of the site, though this would require an upgrade over an extended length (400m+). An extension of 150m to 350m would be required to connect to the new gravity sewer (under construction).</p> <p>MA 50 and MA51 There is a significant amount of land zoned for Phase 1 and Phase 2 Residential and it is unclear why these sites would be required during the plan period. MA50 is an isolated site with no road access or water services. A long extension (ca.350m) along the L3112 would be required to connect MA51 to the new sewer. Water supply could be served from the 80mm pipe on the L3112, though this would likely require an upgrade over an extended length (400m+)</p> <p>MA53 225mm sewer passing through site to be protected.</p> <p>MA54 There is a 150mm water supply pipe within the L3103. There are no sewers that serve this site. However, there is a 300mm sewer under construction from the junction of Gort Mhaoilir and the L3103, this appears to be the closest potential connection point for the developer, approx.450m away.</p>	<p>Noted. See Chief Executives Response to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</p> <p>Noted.</p> <p>Noted. See Chief Executives Response to GLW-C72-25 in relation to Recommendation 2 of the OPR Submission.</p>
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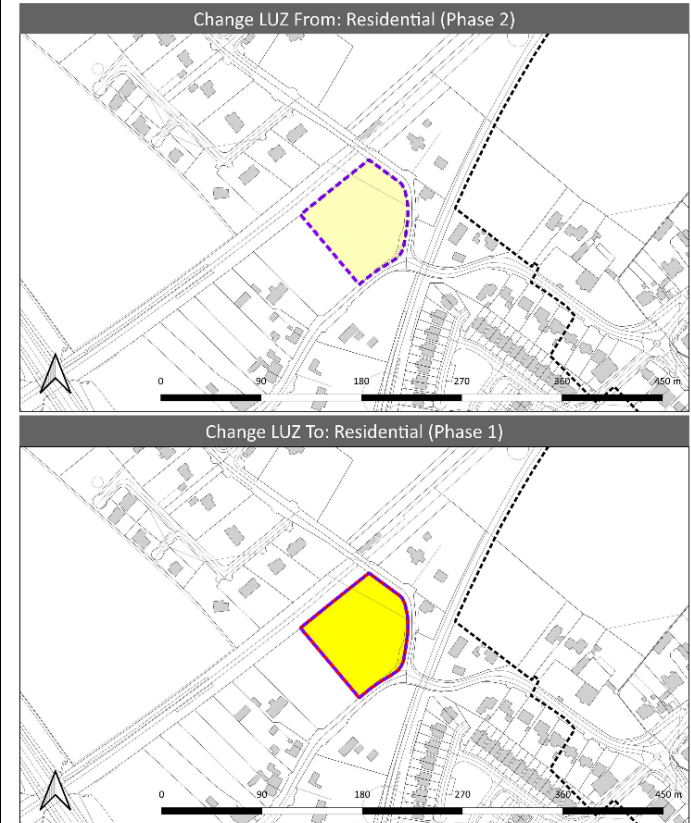
		<p>MA55 and MA64</p> <p>These areas are not served by the public sewer system, the closest sewer is 900m away to the south at the Gort Mhaoilir estate and would require a crossing of the ring road. The nearest distribution water supply is from the L3103.</p> <p>MA56</p> <p>This site is not served by the mains sewer system, available GIS indicates the nearest sewer is at least 400m away at the Pairc na Ri estate, ring road crossing would be required. There is a 80mm water supply pipe in the road to the west of the site and a 50mm water supply pipe in the road to the south, localized upgrades are likely to be required in order to service the site.</p> <p>MA58</p> <p>This site is not served by the public sewer system, the nearest sewer is approx. 700m away and would require a crossing of the ring road. Likely water supply connection would be via 200m network extension to the distribution network on the R347. There is a trunk water main that runs to the west of the site. However, connection to this asset may not be possible, further assessment would be required.</p>	<p>Noted. See Chief Executives Response to GLW-C72-25 in relation to Recommendation 2 of the OPR Submission.</p> <p>Noted. See Chief Executives Response to GLW-C72-25 in relation to Recommendation 2 of the OPR Submission.</p> <p>Noted. See Chief Executives Response to GLW-C72-25 in relation to Recommendation 2 of the OPR Submission.</p>
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		<p>MA59 and MA60 A water supply could be obtained from a 80mm pipe on the L3112, though this would require an upgrade and third party permissions may be required. UÉ's proposed upgrade of the sewer system in Athenry includes a new 375mm foul sewer which would run to the east of the proposed sites. Should this site be developed then suitable separation distances would need to be included to protect this asset.</p> <p>MA67 and MA68 The above should inform the Infrastructure Assessments</p> <p>MA36 The potential operational impacts for existing wastewater treatment facilities should be considered when assessing applications for the development of sensitive receptors in the vicinity of WWTPs. Land use policy objective ASP 27 Public Utilities will be applicable in this instance.</p> <p>The following are specific comments to text as follows: Uisce Éireann welcomes the amendments to DM Standard 2 (MA18), text within Section 2.10 (MA19) and the deletion of Policy Objective ASP 68 (MA20). The wastewater network upgrade project is well underway and due for completion in 2024.</p>	<p>Noted. See Chief Executives Response to GLW-C72-25 in relation to Recommendation 2 of the OPR Submission.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
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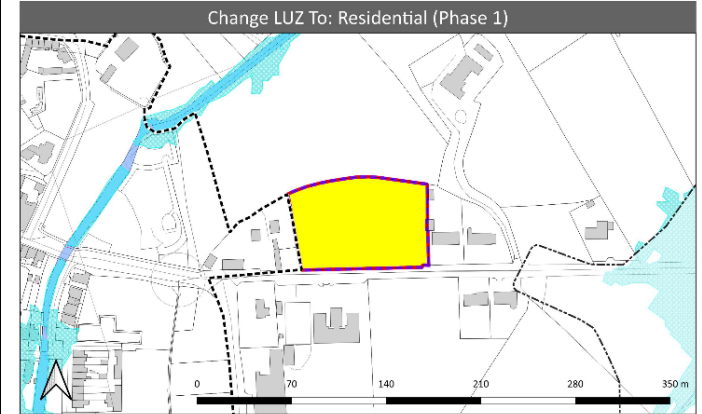
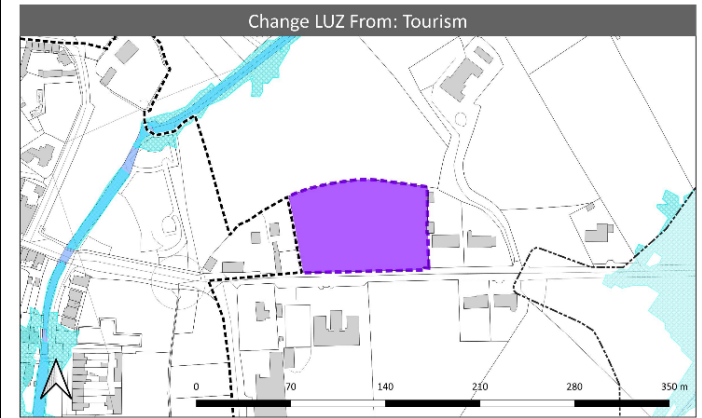
		<p>With regard to the proposed amendments on wastewater in MA19 and suggest the following:</p> <p>Retain: 'In recent years Uisce Éireann has.....and thereby protecting the Clarin River.</p> <p>'Delete: 'Ultimately these works have resulted in the plant operating beyond capacity'.</p> <p>Move to end of paragraph: 'A network project...to cater for the targeted growth in the town.'</p> <p>Reference to text in relation to the Wastewater Treatment and Water Supply that was submitted as part of the submission made to the Draft Athenry LAP 2023 – 2029.</p>	<p>Noted and as a result of the minor modification requested to wording that has already been included in the Draft Plan it is considered that the following is appropriate.</p> <p>In recent years Uisce Éireann has completed a €5 million upgrade to the Athenry Wastewater Treatment Plant to increase capacity and improve water quality in the Clarin River in partnership with Galway County Council. The work has resulted in a plant that will provide improved wastewater discharge standards, ensuring compliance with the requirements of the Urban Wastewater Treatment Directive and thereby protecting the Clarin River.</p> <p>It is considered appropriate to delete the following text as follows Ultimately these works have resulted in the plant operating beyond capacity.</p> <p>A network project to resolve capacity constraints, eliminate noncompliant 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> <p>Noted.</p> <p>Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</i></p>
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			<p><i>See Chief Executives Recommendation to GLW-C72-25 in relation to Recommendation 2 of the OPR Submission.</i></p> <p>Reinsert the text as follows in Section 2.10 Water Supply and Wastewater Treatment;</p> <p>In recent years Uisce Éireann has completed a €5 million upgrade to the Athenry Wastewater Treatment Plant to increase capacity and improve water quality in the Clarin River in partnership with Galway County Council. The work has resulted in a plant that will provide improved wastewater discharge standards, ensuring compliance with the requirements of the Urban Wastewater Treatment Directive and thereby protecting the Clarin River.</p> <p>Delete the text as follows in Section 2.10 Water Supply and Wastewater Treatment;</p> <p>Ultimately these works have resulted in the plant operating beyond capacity.</p>
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MA39 Revert the zoning to Residential Phase 2 as per Draft Athery LAP 2023-2029.



MA38 Revert the zoning to Residential Phase 1 as per Draft Athenry LAP 2023 – 2029.



			<p>MA42 Revert the zoning to Residential Existing as per Draft Athenry LAP 2023 – 2029.</p> 
GLW-C72-9	Dept of Housing, Local Government and Heritage	<p>The Department recommends some suggested changes to the wording of objectives (for accuracy):</p> <p><u>Nature Conservation</u></p>	<p>Chief Executive’s Response</p> <p>Submission Noted. See amended Policy Objectives ASP 61 European Sites</p>

		<p>(MA6) - ASP 61 European Sites</p> <p>“Protect European sites including Special Protection Areas (SPA) and Special Areas of Conservation (SAC) that form part of the Natura 2000 network.</p> <p>A further request is submitted on ASP 61 point 1;</p> <ol style="list-style-type: none"> 1. The plan or project will not give rise to adverse direct, indirect or secondary impacts on the integrity of any European Sites (either individually or in combination with other plans or projects) 	<p>Protect European sites including Special Protection Areas (SPA) and Special Areas of Conservation (SAC) that form part of the Natura 2000 network. 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,</p> <p>The request to further amend the wording of Policy Objective ASP 61 is noted however due to the statutory provisions of the LAP, only minor modification can take place at this stage. It should be noted that this wording was not subject to a Material Alteration, therefore cannot be amended at this stage.</p> <p>Chief Executive’s Recommendation</p> <p>Amend the text as follows in Policy Objective ASP 61 European Sites</p> <p>Protect European sites including Special Protection Areas (SPA) and Special Areas of Conservation (SAC) that form part of the Natura 2000 network. 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,</p>
GLW-C72-2	Dept of Education	The submission refers to the population growth identified for Athenry in the GCDP 2022 – 2028 and the Draft Athenry LAP. It is noted there are no amendments to the	<p>Chief Executive’s Response</p> <p>Submission Noted.</p>

		<p>population projection as outlined in the Draft Athenry LAP and therefore re-confirms the projected school requirements as per their submission made on the Draft Athenry LAP on the 3rd July 2023.</p> <p>The Department welcomes the amendments to Table 1.7.1 Land Use Matrix. The Department notes and welcomes the amendment to the land use matrix table-Education –Primary/Secondary from Not Normally Permitted (N) to Open for Consideration (O) to facilitate the potential future expansion of educational facilities in Athenry. The Department acknowledges the crucial importance of the ongoing work of the Council in ensuring sufficient and appropriate land is zoned for educational needs. The Department wishes to thank Galway County Council for the consideration given to the Department’s submission to the draft Development Plan.</p>	<p>Chief Executive’s Recommendation No Change.</p>
GLW-C72-8	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 Athenry LAP. A number of specific comments are made as follows and it is outlined that opportunities exist for the Draft Plan before it is finalised.</p> <p>Flood Zone Mapping</p> <p>It is outlined that the OPW have issued to Galway County Council the National CFRAM extents for Athenry to Galway Bay, however it does not appear that these extents have</p>	<p>Chief Executive’s Response Noted.</p> <p>The SFRA has considered various factors in the delineation of flood zones, including flood risk indicators, including CFRAM national extents and topographical mapping, and the potential source and direction of flood paths from the</p>

	<p>been used to update the flood risk and flood zone mapping.</p> <p>It is stated that the extent of the proposed MA 13 does not correspond with to the issued extents.</p> <p>In relation to MA33 the proposed rezoning of Open Space/Recreation & Amenity lands to Industrial also requires a review.</p> <p>It is recommended that a review of the extents around Furzypark area to ensure that inappropriate development is not being proposed in flood risk areas.</p> <p>In relation to MA57 it is referenced that there is an area zoned as Industrial which is shown to be located in flood zone A/B on the updated flood zone map. It is stated that this area is not shown at being at risk in the National CFRAM present day extents nor is at risk in the flood risk indicator maps contained in the SFRA. It requested that the Planning Authority confirm the dataset that has been used to establish that this area is within the flood zone.</p>	<p>Clarinbridge River. It is not clear the extent to which, if at all, the CFRAMS flood extent mapping has taken into account the construction of the M6 Motorway and associated works. Flood Zone A and B have been identified at these lands as per available information and the revision to the SFRA that accompanied Proposed Material Alterations on display. The proposed Industrial zoning does not overlap with Flood Zone A or B.</p> <p>The newly supplied CFRAMS National flood extent mapping (present day and future scenarios) covers areas beyond the core parts of Athenry area for which no CFRAMS flood extent data was previously made available. The CFRAMS flood extent mapping (present day and future scenarios) that was included in the original SFRA that accompanied the Draft Plan on display will be updated to include the newly supplied CFRAMS National flood extent mapping in areas where previously no data was provided.</p> <p>Various submissions made as part of the consultation on the Draft Plan included photographs of surface water across the subject site. The submissions identified that the subject site lands:</p> <ul style="list-style-type: none"> • Have flooded "on at least 3 times occasions in the last 10 years where heavy rainfall has caused the water from the nearby Clarin River to rise between 1 and 2 meters" and that "on the last date on which flooding occurred in 2019, part of the footbridge at Athenry
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			<p>Castle had to be removed to alleviate the flood waters upstream" in the Clarin Crescent estate;</p> <ul style="list-style-type: none">• Are flood prone and that drains are full even during periods of normal rainfall; and• Have flooded almost every year during periods of persistent heavy rain. <p>The CFRAMS has mapped present day fluvial flood risk from the Clarin River to the south of the subject site. This dataset does not indicate that the subject site is at risk of flooding.</p> <p>The CFRAMS has also mapped future (under both mid-range and high-end climate scenarios) fluvial flood risk from the Clarin River to the south of the subject site. These datasets do not indicate that the subject site is at risk of flooding.</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 subject site is at a similar elevation as the south/south-east lands. The lands to the north-east, north, west and south-west of the subject site are at higher elevation than the subject site and are likely to be draining to some degree into the subject site.</p> <p>Based on the above, it is considered that the subject site is at elevated risk from pluvial flooding and may be at elevated risk from fluvial flooding to a similar degree as</p>
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		<p>MA50, MA51, MA59 and MA60</p> <p>It is outlined that there are several Material Alterations where lands are to be rezoned from Open Space/Recreation and Amenity or Agriculture to Residential Phase 2. It is stated that there is a slight increase in the National CFRAM future scenario mapping at these sites. It is requested that the Planning Authority would ensure that a precautionary approach to climate change is being taken and that lands that might be at risk of flooding in the future are avoided.</p>	<p>the lands to the south/south-east, which are at similar elevation.</p> <p>A topographical map is provided below showing the Industrial lands at similar elevation as the lands to the south/south-east.</p> <p>The site visit confirmed the above findings, that the subject site is likely to be at significantly elevated risk of flooding from fluvial sources.</p> <p>The Flood Zones were amended to take account of the above information, aligned to relevant topographical data. Furthermore, documentation submitted in support of the Member’s Motion for MA57 acknowledges that the risk to the subject site is higher than indicated by the CFRAMS mapping and identifies a flood zone A and a flood zone B – the CFRAMS mapping indicates that this site would be flood zone C.</p> <p>Noted. See Chief Executives Response to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</p>
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		<p>Supplied Justification Tests</p> <p>Specific reference to the previous comments made at Draft Plan stage in relation to the justification tests. It is stated that the comments raised have not been addressed at Material Alteration Stage.</p> <p>Consideration of Climate Change</p> <p>The OPW welcomes the inclusion of future scenario mapping overlaid with the land use map. It is stated that based on previous comments made in relation to the National CFRAM extents for Athenry to Galway Bay, these extents do not appear to have been used in the future scenario mapping.</p> <p>Nature-based Solutions and SuDS</p> <p>The comments raised at Draft Plan Stage in relation to the application of SuDS has not been taken into account at Material Alteration Stage.</p>	<p>The text under this criterion of the Justification Test had been expanded upon in response to the OPW's previous submission. The multiple Plan provisions identified will contribute towards ensuring: the adequate management of flood risk to the development; and that the use or development of the lands will not cause unacceptable adverse impact elsewhere. Nonetheless, it is agreed that more specific detail regarding relevant measures could be provided.</p> <p>The newly supplied CFRAMS National flood extent mapping (present day and future scenarios) covers areas beyond the core parts of Athenry area for which no CFRAMS flood extent data was previously made available. The CFRAMS flood extent mapping (present day and future scenarios) that was included in the original SFRA that accompanied the Draft Plan on display will be updated to include the newly supplied CFRAMS National flood extent mapping in areas where previously no data was provided.</p> <p>The need for further guidance on the likely applicability of different SuDS techniques for managing surface water run-off at the two opportunity sites was considered but no amendment was deemed necessary.</p>
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			<p>Chief Executive’s Recommendation <i>See Chief Executive’s Recommendation to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</i></p> <p>To update the SFRA’s CFRAMS flood extent mapping (present day and future scenarios) to include the newly supplied CFRAMS National flood extent mapping (present day and future scenarios) in areas where previously no data was provided.</p> <p>To update the Justification Test to include more specific detail regarding relevant measures under Criterion 3.</p>
GLW-C72-3	Transport Infrastructure Ireland (TII)	<p>Transport Infrastructure Ireland (TII) has raised several points in their submission.</p> <p>MA32, MA33 and MA34</p> <p>TII notes the additional zoning designations to lands subject to the above material alterations which are all located in the vicinity of M6 Junction 17.</p> <p>Reference is made to the general comments made at the Draft Plan Stage on the Business and Technology lands in the vicinity of the M6 Junction 17.</p> <p>It is noted that while the Local Transport Plan includes measures such as proposed cycle trackway and footpath upgrades (Measure WCO1) along the R-348 the subject lands are in close proximity to the M6 Junction 17 and as</p>	<p>Chief Executive’s Response Submission noted.</p> <p>In relation to MA 32, MA33 and MA 34 the concern in relation to employment lands are noted. As referenced in the Chief Executives Report at Draft Plan Stage the lands identified and zoned Business and Technology and other employment uses in the Draft Athenry LAP 2023 – 2029 are a strategic land bank of employment lands. The lands subject to MA32 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 Irish Rail are investing in increasing commuter train service it was</p>

		<p>a result it is stated that it is likely that private car trips may remain a dominant and attractive mode options.</p> <p>It is noted that the initial Draft Plan zonings that there was an established zoning in relation to employment lands, it is reiterated again that TII are not aware of any evidence base established to demonstrate compliance with the requirements of Section 2.7 of the Guidelines.</p> <p>Reference is made to a recent planning application (23/61035) that was granted on the Business and Technology lands and the level of car parking indicated.</p> <p>It is considered that based on the above that the issues raised by TII at the Draft Plan stage and comments made on the planning application referenced above is still relevant.</p> <p>There is concern expressed that the mapping detail associated with Proposed Material Amendments MA32, MA33 and MA34 is insufficient in detail to establish that the proposed new zonings do not encroach onto the lands acquired and reserved for the M6 Motorway Junction 17 and associated infrastructure. Clarification is sought in relation to this point.</p>	<p>considered prudent to identify and zone lands for employment uses.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted</p> <p>The additional lands subject to these Material Alterations (MA32, MA33 and MA34) are simply reflecting the land bank owned by the IDA(MA32) and the other landowners (MA33 and MA 34). There is no proposal to encroach onto the M6 Road or associated Junctions. Reference to the recent grant of planning application on one section of the lands (Lands adjacent to MA32) for employment use is noted however it is considered that the additional measures identified in the LTP addresses the issues raised.</p>
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		<p>MA69</p> <p>This Material Amendment relates to the Local Transport Plan. TII welcomes that section 2.2 of the Draft Local Transport Plan has been updated to reflect that works to national roads in urban areas are required to adhere to TII Publications.</p> <p>The additional reference to both TII publications DN -GEO 03084” The Treatment of Transition Zones to Towns and Villages on National Roads” and TII publication DN-GEO 03030(Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes) is welcomed in the updated LTP.</p> <p>The updates in relation to Section 4.2 are welcomed.</p> <p>Other Matters</p> <p>Consultation with the Councils own internal project and/or design staff in relation to greenway and active travel measures are advised.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Chief Executive’s Recommendation No Change</p>
GLW-C72-19	National Transport Authority (NTA)	<p>A comprehensive submission has been received with several observations and recommendations.</p> <p>1. Material Alterations 32, 33 & 34</p> <p>It is noted that intensification of employment use at these sites in absence of transport infrastructure will increase private car trip reliance and that sufficient quantum of</p>	<p>Chief Executive’s Response Submission noted.</p> <p>MA 32, 33 and 34 relate to small parcels of lands where it was proposed to reconfigure the said lands which reflects</p>

		<p>employment land is already zoned in Athenry according to the Core Strategy of the Development Plan. Therefore, it is requested not to retain these material alterations in the Final LAP.</p> <p>2. Material Alterations 40, 41, 42 & 43 The submission outlines that these material alterations are premature pending the delivery of appropriate active travel infrastructure which their delivery is challenging in the short to medium term and will increase private car trip reliance. It is noted these lands should not be zoned Residential Phase 1 during the lifetime of the LAP. Therefore, it is requested not to retain these material alterations.</p> <p>3. Material Alterations 46 and 49 It is noted the two material alterations outside the settlement boundary are peripherally located and lack of appropriate transport infrastructure. Whilst the LTP proposes measures to serve the lands, the NTA considers they can't be implemented in the short or medium term and support the proposed scale of residential development; Therefore, it is requested not to retain these material alterations in the Final LAP.</p> <p>4. Material Alteration 47 The submission outlines the intensification of residential development at Baunmore, significantly removed from the town centre, not aligned with compact growth,</p>	<p>the land ownership. This is acknowledged by Planning Authority and is considered acceptable.</p> <p>Noted. See Chief Executives Response to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</p> <p>See Chief Executives Response to GLW-C72-24 in relation to the Uisce Éireann Submission on MA42.</p> <p>Noted. See Chief Executives Response to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</p> <p>Noted. See Chief Executives Response to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</p>
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		<p>sequential approach and not supporting proper planning and sustainable development is not appropriate during the lifetime of the LAP although the LTP proposes additional measures. Therefore, it is recommended not to retain MA47 in the Final LAP.</p> <p>5. Material Alteration's 55, 56, 58 & 64</p> <p>It is noted there is considerable quantum of additional land zoned Industrial on the western boundary of the town whilst there are existing undeveloped lands for such purposes. Therefore, it is requested not appropriate to retain these material alterations in the Final LAP.</p> <p>6. Material Alteration 69</p> <p>The submission outlines in relation to material alterations with zoning changes that the purpose of the LTP is not to introduce measures that can accommodate non-sequential development, non-supporting compact growth and notes what the purposes of the LTP are. The NTA requests to not retain the extended measures set out in the LTP under MA69.</p>	<p>Noted. See Chief Executives Response to GLW-C72-25 in relation to Recommendation 2 of the OPR Submission.</p> <p>Noted. See Chief Executives Response to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</p> <p>Chief Executive's Recommendation <i>See Chief Executive's Recommendation to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</i></p> <p><i>See Chief Executive's Recommendation to GLW-C72-25 in relation to Recommendation 2 of the OPR Submission.</i></p> <p><i>See Chief Executives Recommendation to GLW-C72-24 in relation to the Uisce Éireann Submission.</i></p>
GLW-C72-1	Environmental Protection Agency (EPA)	The Environmental Protection Agency (EPA) has raised several points in their submission.	<p>Chief Executive's Response</p> <p>The Council welcomes the submission received from the EPA. The SEA process will consider these issues and ensure</p>

		<p>Proposed SEA Determination</p> <p>The EPA notes the proposed determination regarding the need for SEA of the Material Alterations (MA).</p> <p>The submission observes their ‘SEA of Local Authority Land Use Plans – EPA Recommendations and Resources’ 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>all requirements are met until and following the adoption of the Plan.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
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		<p>The submission further notes that the Draft Athenry LAP should be consistent with key relevant higher-level plans and programmes.</p> <p>Specific Comments to be considered. The EPA outlines key aspects below to be taken into account in preparing Material Alterations. Clear justification should be given when proceeding with Material Alterations having likely significant environmental effects or which conflict with national environmental or planning policy. The Draft Athenry LAP should also consider and integrate recommendation of the SEA prior to its adoption.</p> <p>Future Modifications to the Draft Plan The submission notes further changes to the Draft Athenry LAP should be screened for likely significant effect in accordance with SEA Regulations and should be assessed as the “environmental assessment” of the Draft Athenry LAP.</p> <p>SEA Statement – “Information on the Decision” 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; 	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
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		<ul style="list-style-type: none"> • 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>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. <p>any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation or LAP.</p>	<p>Noted.</p> <p>Chief Executive's Recommendation No Change.</p>
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General Submissions			
Submission No.	Submission Name	Summary of Issues Raised in Submission	Chief Executive's Response
GLW-C72-12	MKO (on behalf of Bellerin 3A Ltd)	<p>The submission refers to the following Material Alterations:</p> <ul style="list-style-type: none"> • MA40, • MA41, and; • MA42. <p>The submission welcomes the Material Alterations and requests there maintained in the adopted Athenry LAP 2023 – 2029. Several points have been outlined to support the Material Alterations as follows:</p> <ul style="list-style-type: none"> • Proximity to Athenry Train Station and community facilities; • Sequential location of lands from the Town Centre; • Publication of Census 2022 data indicated predicted growth has been surpassed and requirement to accommodate the rapidly growing population, and; • Reference to Draft Athenry LTP and connectivity, enhanced existing active travel routes, including upgrades of R348. 	<p>Chief Executive's Response</p> <p>Noted. In relation to MA40 and MA41 see Chief Executives Response to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</p> <p>Regarding MA42 see Chief Executives Response to GLW-C72-24 in relation to Uisce Éireann Submission.</p> <p>Chief Executive's Recommendation</p> <p><i>See Chief Executives Recommendation to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</i></p> <p><i>See Chief Executives Recommendation to GLW-C72-24 in relation to the Uisce Éireann Submission.</i></p>
GLW-C72-20	A Martens (on behalf of Coffey Group)	A comprehensive submission was received in relation to lands at Parklands, Caheroyn, Athenry. The submission references their previous submission (GLW-C60-114) on the Draft Plan.	<p>Chief Executive's Response</p> <p>In preparing the Draft Athenry LAP 2023 – 2029 lands were identified based on a number of parameters. It was considered appropriate to identify lands for residential</p>

		<p>The submission refers to the Material Alterations MA1, MA66 and M67 and the following is requested:</p> <ol style="list-style-type: none"> 1. MA1 and MA66 should be removed from the Urban Framework Plan area. These lands have been identified as parcels 'A' and 'B'. It is requested that these land parcels should be rezoned to Residential Phase 1. <p>It further states that in the event the Planning Authority considers it necessary to retain the parcels within the Urban Framework Plan parcel 'B' would be retained as Residential Phase 2 and Parcel 'A' would be removed from the Urban Framework Plan Boundary and zoned Residential Phase 1.</p> <ol style="list-style-type: none"> 2. It is requested that MA67 which includes the Infrastructure Assessment for proposed residential lands be revised to include an assessment of the specific infrastructure and services available to service the lands at Caherroyn. It is requested that this would be prepared separately from the remainder of the large undeveloped landholding referred to as "R2e" and would be included separately in Appendix E. 3. It is requested that land parcels "A" and "B" would be rezoned from Residential Phase 2 to Residential Phase 1. <p>The submission provided a rationale as outlined below:</p> <ul style="list-style-type: none"> • It is stated that the lands can be suitably accessed, and developed and include necessary services and connections to public infrastructure within the lifetime of the LAP; 	<p>development in the Plan Area for short to medium development potential and in accordance with the Core Strategy Allocation of the GCDP 2022 - 2028. Based on the quantum of lands at this location it was considered warranted under <i>Policy Objective ASP 6 Urban Framework Plan in Residential Phase 2 lands (Caherroyn)</i> to prepare this Plan. In order to achieve the full potential of these lands it is deemed critical to further examine the complete land holding identified in Appendix C of the Material Alteration Documents to deliver a more comprehensive and cohesive analysis of this area. The wording of the policy objective has been amended to ensure the Urban Framework Plan is prepared within 18 months of the adoption of the LAP.</p> <p>Chief Executive's Recommendation No Change.</p>
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		<ul style="list-style-type: none"> • The development of the lands would be in accordance with compact growth, a sequential approach (better located than other lands zoned Residential Phase 1) and the proposed Urban Framework Plan under MA1 and MA66 (referring to Appendix 1); • In relation to MA67, the submission states the lands are suitable for residential development and undertook an Infrastructure Assessment (based on submitters assessment) which responds to the criteria (Compact growth, Infrastructure and Services and Physical Suitability) of the lands to be considered as 'Tier 1: Serviced Zoned Land' as defined by the National Planning Framework; • Reference is made to the site context with the landholding, the location and a pedestrian linkage to the R347 (Tuam Road) part of a live planning application; • The planning history is noted with a live planning application of 92 residential units on appeal to An Bord Pleanála being part of the Parklands estate built as a phase 1 and responding to the refusals of two previous planning applications for lack of pedestrian facilities on the R347 railway overbridge and the lack of an Action Area Plan; • High-level policy context with the Strategic Potential status of the town along with the recently granted Dexcom planning permission and the need to provide housing was outlined; 	
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		<ul style="list-style-type: none"> • The submission noted that the motivations of the previous submission (no. GLW-C60-114) are still relevant, and; • Reference is also made to the OPR's previous submission (no. GLW-C60-101). 	
GLW-C72-21	Enviroplan Consulting Ltd (on behalf of Laurem Construction Ltd)	<p>The submission refers to MA47. The submission requests to retain the Material Alteration in the adopted Athenry LAP 2023 – 2029 and has raised several points as outlined below:</p> <ul style="list-style-type: none"> • Planning history of the area and granted permissions, a live planning application on appeal to An Bord Pleanála and the necessity for the lands to be zoned Residential Phase 1 as per the current Athenry LAP – 2012 – 2022; • Subject lands spatially and sequentially closer than other lands zoned Residential Phase 1 to the town centre, closer to the Dexcom granted planning application and reduction of car-based journeys and footpaths proposals of the planning application in line with the Draft LAP and Draft LTP; • Reference is made to MA67 and the Infrastructure Assessment for Residential Lands, and; • It is requested that the subject lands also be considered in Development Plans – Guidelines for Planning Authorities, Section 4.4.3 “Ensuring Sufficient Provision of Housing Lands/Sites” and the flexibility allowed for additional residential 	<p>Chief Executive’s Response See Chief Executives Response to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</p> <p>Chief Executive’s Recommendation <i>See Chief Executives Recommendation to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</i></p>

		zoned land regarding the “Strategic Potential” status of Athenry.	
GLW-C72-22	Grealish Glynn & Associates (on behalf of Sharon Lally)	<p>Reference is made to the previous submission (no. GLW-C60-71) and MA46. The submission reiterates its support to zone the lands from Outside the Settlement Boundary to Residential Phase 1 and has raised several points as follows:</p> <ul style="list-style-type: none"> • The Draft Plan Chief Executive Report has failed to fully appreciate the close proximity to a sewer and water connection and that minimal intervention is required in terms of footpath connectivity. The Draft LTP proposes to connect the lands to the Town Centre, and this has not been acknowledged in the Chief Executive Report. It is stated that the extension of the footpath/cycleway will abut development lands and the boundary of same can be pushed back to accommodate the footpath if required; • It is stated that the lands are close to the Town Centre, Athenry Railway Station, and the Primary School; • It is stated that there is a shortage of housing in the area and the need to provide good quality housing within the town, especially with the development of Dexcom, and; • The site has access to a new sewer line with natural gravity feed. 	<p>Chief Executive’s Response See Chief Executives Response to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</p> <p>Chief Executive’s Recommendation <i>See Chief Executives Recommendation to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</i></p>
GLW-C72-23	Noel and Sharon Lally	This submission supports MA46, the amended Draft LTP and has raised several points as outlined below:	<p>Chief Executive’s Response See Chief Executives Response to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</p>

		<ul style="list-style-type: none"> Athenry is facing a significant housing demand with few availabilities; The lands are within the settlement boundary of the current Athenry LAP 2012-2022, 750m from the town centre, 800m from Athenry train station and the zoning of lands follows a sequential approach and compact development, and; Reference has been made to the NTA submission (no. GLW-C72-19) received on Material Alterations. It is stated that the landowners are fully supportive of the development of WC19 and WC20 identified in the Draft LTP. 	<p>Chief Executive’s Recommendation <i>See Chief Executives Recommendation to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</i></p>
GLW-C72-26	MKO (on behalf of Highgate Ltd)	The submission relates to MA3. The submission refers to a previous submission made on the Draft Plan (GLW-C60-77) and welcomes the Material Alteration. It is noted that the landowner is ready to work closely with the Planning Authority to develop the lands which are well connected to the town centre to deliver high-quality housing with the principles of sequential approach, placemaking which would be embedded properly within existing residential areas.	<p>Chief Executive’s Response Noted. As part of the submissions received on the Draft Plan it was considered appropriate to zone the lands Residential Phase 1.</p> <p>Chief Executive’s Recommendation No Change.</p>
GLW-C72-27	MKO (on behalf of Keira Hanney, Eanna Hanney and Maria Powell)	The submission relates to MA3. The submission refers to a previous submission made on the Draft Plan (GLW-C60-77) and welcomes the Material Alteration. It is noted that the landowner is ready to work closely with the Planning Authority to develop the lands which are well connected to the town centre to deliver high-quality housing with the principles of sequential approach, placemaking which	<p>Chief Executive’s Response Noted. As part of the submissions received on the Draft Plan it was considered appropriate to zone the lands Residential Phase 1.</p> <p>Chief Executive’s Recommendation No Change.</p>

		would be embedded properly within existing residential areas.	
GLW-C72-4	Jim Reidy	<p>The submission relates to MA21 and MA2. The submission refers to the previous submission made on the Draft Plan (GLW-C60-10) and welcomes parts of the observations made are included in the material alterations.</p> <p>It is requested for the reasons outlined in submission no. GLW-C60-10 that the whole Cullairbaun area is rezoned from Residential Phase 1 to Open Space/Recreation & Amenity.</p> <p>Concerning the submission made on Draft Plan (GLW-C60-101), the lands in Ballast Pit (MA2) it is requested that only an area required for railroad should be zoned as such and the remainder of lands zoned Open Space/Recreation & Amenity.</p>	<p>Chief Executive’s Response Submission noted. The Chief Executive’s Responses and Recommendation to the previous submission (GLW-C60-10) are still relevant.</p> <p>MA21 reflects the zoning from the Athenry LAP 2012-2022. In the Chief Executives Report it was considered appropriate based on a further analysis and from the submissions received to rezone the lands to Open Space/Recreation and Amenity. The request to zone additional lands is noted however due to the statutory provisions of the LAP, only minor modification can take place at this stage. The zoning of additional lands is not a minor modification.</p> <p>Noted. The Chief Executive Recommended to rezone the two lands parcels Residential Phase 2 and Transport Infrastructure. However, the Elected Members agreed to rezone one parcel (MA2) to Transport Infrastructure and the other parcel to be remain Residential Phase 1. The request to zone the Residential Phase 1 is noted however due to the statutory provisions of a LAP, only minor modification can take place at this stage of the process. The rezoning of this land parcel is not a minor modification.</p> <p>Chief Executive’s Recommendation No Change.</p>

GLW-C72-28	Fern Hill and Stonehaven Residents	<p>The submission relates to an area of lands to the rear of Fern Hill and Stonehaven estates. The submission refers to a previous submission (GLW-C60-78) opposed to the Residential Phase 1 zoning on subject lands and has raised several points as follows:</p> <ul style="list-style-type: none"> • It is requested to rezone lands to Residential Phase 2; • It is requested that the footpath, lighting and traffic calming issues should be resolved first on Monivea Road which cannot support additional traffic and the Relief Road should also be built to redirect the influx of traffic; • Concern is raised regarding access arrangements through Fern Hill and Stonehaven estates which is not on a public road; • Health and safety concerns are noted with additional traffic; • There is limited green space for children to play, which results in children playing on the road network and footpaths. Concern is expressed that the construction traffic will affect the well-being of the children in the estate; • The proposed development will cause nuisance and annoyance to residents. 	<p>Chief Executive’s Response</p> <p>Submission noted. The Chief Executive’s Responses and Recommendation to the previous submissions (GLW-C60-78) are still relevant. The Chief Executive Recommended to rezone the two lands parcels Residential Phase 2 and Transport Infrastructure. However, the members agreed to rezone one parcel (MA2) to Transport Infrastructure and the other parcel to be remain Residential Phase 1. The request to zone the Residential Phase 1 is noted however due to the statutory provisions of a LAP, only minor modification can take place at this stage of the process. The rezoning of this land parcel is not a minor modification.</p> <p>Chief Executive’s Recommendation</p> <p>No change.</p>
GLW-C72-5	Anton Tsernjavski	<p>The submission refers to MA5 south of Páirc Na hAbhainn estate and has included several points opposing the inclusion of lands subject to MA5 as follows:</p> <ul style="list-style-type: none"> • Preservation of the natural habitat and protection of the fauna; 	<p>Chief Executive’s Response</p> <p>Noted. See Chief Executives Response to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</p> <p>Chief Executive’s Recommendation</p>

		<ul style="list-style-type: none"> • The close proximity of the lands to the motorway; • The development of another estate will put increased pressure on infrastructure and the increased daily traffic that will be generated are of concern. 	<p><i>See Chief Executives Recommendation to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</i></p>
GLW-C72-7	Anton Tsernjavski	<p>The submission refers to MA5 south of Páirc Na hAbhainn estate. This submission accompanies GLW-C72-5. In addition to the comments made under that submission there is concern regarding flooding.</p> <p>It is stated that a new residential development will increase the flooding issues at Páirc Na hAbhainn.</p>	<p>Chief Executive’s Response Noted. See Chief Executives Response to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</p> <p>Chief Executive’s Recommendation <i>See Chief Executives Recommendation to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</i></p>
GLW-C72-30	Linda Crowe	<p>The submission refers to MA5 south of Páirc Na hAbhainn estate and has included several points opposing the inclusion of lands subject to MA5 as follows:</p> <ul style="list-style-type: none"> • Loss of natural light and privacy; • Flooding of gardens in Páirc Na hAbhainn estate; and • Increased vehicular traffic endangers the residents and children. There is a query raised in relation to where the entrance of the estate will be. 	<p>Chief Executive’s Response Noted. See Chief Executives Response to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</p> <p>Chief Executive’s Recommendation <i>See Chief Executives Recommendation to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</i></p>
GLW-C72-6	Sharon Crowe	<p>The submission relates to an area of land to the rear of Abbey Glen Estate. Reference is made to the submission at Draft Plan stage (GLW-C60-105) and MA21 in Cullairbaun Estate. The submission is opposed to the Residential Phase 1 zoning on subject lands and has raised several points as follows:</p> <ul style="list-style-type: none"> • It is requested to rezone lands to Open Space/Recreation and Amenity; 	<p>Chief Executive’s Response Submission Noted. The Chief Executive’s Response and Recommendation to submission made on the Draft Plan (GLW-C60-105) is still relevant.</p> <p>The request to zone these lands is noted however due to the statutory provisions of a LAP, only minor modification can take place at this stage of the process. The rezoning of this land parcel is not a minor modification.</p>

		<ul style="list-style-type: none"> • The area in question floods regularly after a period of heavy rainfall; • Concerns are raised regarding access arrangements through Abbey Glen. • The development of subject lands will negatively impact Abbey Glen properties; • The site’s planning history 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 in the estate; • The area should be designated as a Special Area of Conservation (SAC) to protect and enhance the biodiversity of the area; • The proposed development will cause overshadowing, thus reducing the value of existing Abbey Glen properties; • Concerns were raised regarding the impact on the existing sewerage system in the estate. • Health and safety concerns are noted with additional traffic; • Entrance and exit are narrow emerging onto the R347; and • New Residential development will impact the resident's quality of life. 	<p>Chief Executive’s Recommendation No Change.</p>
GLW-C72-11	Peter Sullivan	<p>The submission relates to an area of land to the rear of Abbey Glen Estate. The submission is opposed to the Residential Phase 1 zoning on subject lands and has raised several points as follows:</p>	<p>Chief Executive’s Response Submission Noted. The request to zone these lands is noted however due to the statutory provisions of a LAP, only minor modification can take place at this stage of the</p>

		<ul style="list-style-type: none"> • The area in question floods regularly after a period of heavy rainfall; • Queries the Residential Phase 1 zoning based on the Constrained Lands Use zoning (Flood Zone A and B) behind Abbey Glen in the Draft Athenry LAP and suggests that it would be inconsistent to maintain a Residential zoning at this site due to 'similar flooding conditions'; • References the current planning application and site layout; and • Queries potential access to community and agriculture zoned land through Abbey Glen estate and raised concern regarding the potential increase in vehicular and pedestrian activity. 	<p>process. The rezoning of this land parcel is not a minor modification.</p> <p>Chief Executive's Recommendation No Change.</p>
Commercial Mixed Use			
GLW-C72-10	Enviroplan Consulted Limited on behalf of RHOC (Athenry) Ltd	<p>The submission refers to MA53 and the previous submission (GLW-C60-94). The submission requests MA53 to be maintained and to rezone the lands within the associated landholding as in the Athenry LAP 2012 - 2022 from Open Space/Recreation and Amenity to Commercial/Mixed Use indicated as Site B. Some points are raised as follows:</p> <ul style="list-style-type: none"> • Reference to a live planning application which is on appeal to Bord Pléanala for a mixed-use office and residential development. • Concerns are expressed that without the rezoning the application will be refused, and ; 	<p>Chief Executive's Response</p> <p>Submission noted. The Chief Executive's Response and Recommendation to the submissions made on the Draft Plan (GLW-C60-94 and GLW-C60-92) are still relevant.</p> <p>MA53 was rezoned from Existing Residential to Commercial Mixed Use which was contrary to the advice of the Planning Authority. The remaining lands zoned Open Space/Recreation & Amenity were retained as per the Draft Plan which did not result in a Material Alteration.</p> <p>The request to zone these lands is noted however due to the statutory provisions of a LAP, only minor modification</p>

- It is noted that a Flood Risk Management presentation at the Councils Planning Seminar (November 2022) confirms the Flood Risk Management Guidelines allow for consideration of Commercial Ground Floor Development within Flood Zone B and the Site Specific Flood Risk Assessment as part of the live planning application was accepted by the Planning Authority.

can take place at this stage of the process. The rezoning of this land parcel is not a minor modification.

Chief Executive’s Recommendation

MA53 Revert the zoning to Existing Residential as per Draft Athenry LAP 2023-2029.



Business and Technology			
GLW-C72-17	MKO on behalf of IDA Ireland	<p>A comprehensive submission was received in relation to MA32. The IDA welcomes the proposed zoning alteration as it will facilitate the beneficial development of the lands.</p> <p>Reference is made to a recent grant of planning permission for a medical device manufacturing facility.</p> <p>An outline of the role that IDA Ireland plays in job creation in the country is given.</p> <p>Specific reference is made to the TII submission (GLW-C72-3) that was received concerning MA32. A comprehensive analysis has been submitted by the IDA in relation to the comments made by the TII.</p> <p>Reference and outline of car parking requirements for the medical manufacturing facility is given.</p>	<p>Chief Executive's Response</p> <p>The support for MA32 is noted. The Chief Executive recommended to rezone lands from Open Space/Recreation and Amenity to Business and Technology to reflect the land bank of the IDA.</p> <p>Noted.</p> <p>Noted.</p> <p>See Chief Executives Response to GLW-C72-3.</p> <p>Noted. It is considered that the updates to the Local Transport Plans that are subject to Material Alteration proposed cycle track ways and upgrade to footpaths which are all welcomed in the promotion of sustainable mobility.</p> <p>Chief Executive's Recommendation</p> <p>No Change.</p>
Industrial			
GLW-C72-13	John Moylan	The submission refers to MA57 and requests the lands be retained as Industrial. The submission has raised the following points:	<p>Chief Executive's Response</p> <p>See Chief Executives Response to GLW-C72-8.</p>

		<ul style="list-style-type: none"> • MJ Quinn is a longstanding employer in Athenry and has had a significant social contribution to the town; • It is noted since the flooding in 2009, the OPW has done significant work; • OPW submission (GLW-C72-8) outlined the site does not represent flood risk on the CFRAM, and; • Several photos of the site have been included after the rainfall of the 1st of November 2023. 	<p>Chief Executive’s Recommendation <i>See Chief Executives Recommendation to GLW-C72-8.</i></p>
GLW-C72-14	Micheal Quinn	<p>The submission refers to MA57 and requests the lands to be retained as Industrial. The submission has raised the following points:</p> <ul style="list-style-type: none"> • The business has been in family ownership for generations. The business is historically established in the town which supports the local community; • The retention of the lands zoned “Industrial” is vital to sustaining the internationally growing family business without could lead to the closure of the company and the loss of more than a hundred jobs, and; • The OPW submission (GLW-C72-8) and the CFRAM map confirm the land parcel is not subject to flooding. 	<p>Chief Executive’s Response See Chief Executives Response to GLW-C72-8.</p> <p>Chief Executive’s Recommendation <i>See Chief Executives Recommendation to GLW-C72-8.</i></p>
GLW-C72-15	Micheal Quinn	<p>The submission refers to MA57 and requests the lands to be retained as Industrial. The submission has raised the following points:</p> <ul style="list-style-type: none"> • The business has been in family ownership for generations. The business is historically established in the town which supports the local community, and; • The OPW submission (no. GLW-C72-8) and the CFRAM map confirms the lands are not subject to flooding. 	<p>Chief Executive’s Response See Chief Executives Response to GLW-C72-8.</p> <p>Chief Executive’s Recommendation <i>See Chief Executives Recommendation to GLW-C72-8.</i></p>

GLW-C72-16	MKO (on behalf of MJ Quinn and SIP Energy, Athenry)	<p>The submission refers to MA57. The submission requests the land to be zoned Industrial and has raised several points as follows:</p> <ul style="list-style-type: none"> • Site context is outlined with the lands owned by the Quinn family adjoining MJ Quinn and SIP Energy Factory; • Connectivity and access with the site being the closest Industrial land to the town centre as illustrated in the Infrastructural Assessment Proposed Employment Lands; • The Quinn family owns the lands, their companies MJ Quinn and SIP Energy are historically established in the town; • It is requested that the lands be retained as Industrial as it is required to extend their facilities and sustain their internationally growing demand without which could lead to the closure of the company and the loss of more than a hundred jobs, and; • The lands are not located in a flood risk zone as indicated in the CFRAM data. 	<p>Chief Executive’s Response See Chief Executives Response to GLW-C72-8.</p> <p>Chief Executive’s Recommendation <i>See Chief Executives Recommendation to GLW-C72-8.</i></p>
General Comments			
GLW-C72-18	Gareth Elhinney & Mary McGill	An extensive submission was received concerning Appendix E – Infrastructure Assessment on Proposed Residential Lands (MA67). It is referenced that the recommendations of the OPR and the Chief Executive have not been included in a significant number of the Material Alterations.	<p>Chief Executive’s Response Noted.</p>

		<p>In reference to the land parcel identified as R1n in Appendix E, which illustrates the rezoning from Residential Phase 2 to Residential Phase 1 it is suggested that this should not proceed. Residential Phase 1 and Phase 2 lands from the 2012-2023 LAP remain undeveloped and the rezoning of the lands in Fern Hill/Ballydavid South is leap-frogging these lands which would be contrary to policy objective ASP5.</p> <p>In reference to the following Material Alterations (MA22, MA50, MA53, MA59, MA60 and MA61) it is suggested that based on the mapping provided a number of land parcels to be zoned predominately residential development are partially within or adjacent to areas prone to flooding. It is suggested that these should not proceed.</p>	<p>Noted. The lands subject to R1n are not subject to Material Alteration.</p> <p>MA50, MA59 and MA60 see Chief Executives Response to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</p> <p>MA22 was a result of a submission from the Draft Plan. Having regard to the Flood Risk Assessment and further site visit on 11th August 2023 it was considered appropriate to zone these lands Residential Infill to complete Slí An Chlairín estate.</p> <p>MA53 was rezoned from Existing Residential to Commercial Mixed Use which is contrary to the advice of the Chief Executive. It is considered that the lands should revert to Existing Residential as per the Draft Plan. See Chief Executives Response to GLW-C72-10.</p> <p>MA61 is zoned Open Space/Recreation and Amenity as it is located in Flood Zone A and B. MA61 is associated with MA59 and MA60 and based on the OPR Recommendation 1 these lands should revert to the Draft Plan.</p> <p>See Chief Executives Response to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</p>
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GLW-C72-29	Noel and Sharon Lally	<p>The submission refers to the OPR Submission (GLW-C72-25) on Material Alteration to the Draft Athenry LAP 2023 – 2029. It is noted that the OPR submission references MA46 and states these lands are outside the settlement boundary. The submission states these lands are not outside the settlement boundary and are zoned Residential Phase 2 in the Athenry LAP 2012 – 2022.</p>	<p>Chief Executive’s Response Noted. See Chief Executives Response to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</p> <p>Chief Executive’s Recommendation <i>See Chief Executives Recommendation to GLW-C72-25 in relation to Recommendation 1 of the OPR Submission.</i></p>