

# SEA ENVIRONMENTAL REPORT

## APPENDIX III – NON-TECHNICAL SUMMARY

---

FOR

**RELEVANT PROPOSED MATERIAL ALTERATIONS**

TO THE

**DRAFT ATHENRY LOCAL AREA PLAN  
2023-2029**

**for: Galway County Council**

Áras an Chontae  
Prospect Hill  
Galway



**Comhairle Chontae na Gaillimhe  
Galway County Council**

**by: CAAS Ltd.**

1<sup>st</sup> Floor  
24-26 Ormond Quay Upper  
Dublin 7



**OCTOBER 2023**

## Table of Contents

<b>Section 1</b>	<b>Introduction and Terms of Reference .....</b>	<b>1</b>
<b>Section 2</b>	<b>The Draft Plan to which the Proposed Material Alterations relate .....</b>	<b>3</b>
2.1	Introduction .....	3
2.2	Content of the Draft Plan.....	3
2.3	Strategic Aims .....	3
2.4	Proposed Material Alterations.....	4
2.5	Strategic work undertaken by the Council to ensure contribution towards environmental protection and sustainable development.....	4
2.6	Relationship with other relevant Plans and Programmes .....	5
<b>Section 3</b>	<b>The Environmental Baseline.....</b>	<b>6</b>
3.1	Introduction .....	6
3.2	Likely Evolution of the Environment in the Absence of the Draft Plan and associated Proposed Material Alterations.....	6
3.3	Biodiversity and Flora and Fauna.....	6
3.4	Population and Human Health.....	7
3.5	Soil.....	8
3.6	Water .....	11
3.7	Air and Climatic Factors.....	13
3.8	Material Assets .....	13
3.9	Cultural Heritage.....	15
3.10	Landscape.....	15
3.11	Strategic Environmental Objectives.....	16
<b>Section 4</b>	<b>Alternatives .....</b>	<b>18</b>
4.1	Introduction .....	18
4.2	Limitations in Available Alternatives .....	18
4.3	Type 1: Alternatives Already Considered .....	18
4.4	Type 2: Land Use Zoning Alternatives.....	18
4.5	Type 3: Alternatives for Transport.....	19
<b>Section 5</b>	<b>Summary of Effects arising from Plan.....</b>	<b>21</b>
<b>Section 6</b>	<b>Mitigation and Monitoring Measures .....</b>	<b>23</b>
6.1	Mitigation.....	23
6.2	Monitoring.....	23

# Section 1 Introduction and Terms of Reference

This is the Non-Technical Summary of the Environmental Report for relevant Proposed Material Alterations to the Draft Athenry Local Area Plan 2023-2029. The purpose of the Environmental Report is to provide a clear understanding of the likely environmental consequences of decisions regarding the Proposed Material Alterations. The Environmental Report has been prepared as part of a Strategic Environmental Assessment (SEA) process for the Proposed Material Alterations.

The Proposed Material Alterations were screened for the need to undertake SEA. Certain Proposed Material Alterations were determined as requiring full SEA. The SEA Screening Determination accompanies the SEA Environmental Report and the Proposed Material Alterations document. Appendix II to the SEA Environmental Report comprises the SEA Screening Report that was prepared to inform the SEA Screening Determination.

This SEA Environmental Report provides the findings of the assessment and will be placed on public display alongside the Proposed Material Alterations. The Elected Members will be required to take account of this document, the Proposed Material Alterations and any submissions received on these after public display.

The SEA is being undertaken in order to comply with Section 20 of the Planning and Development Act, as amended.

## **What is SEA?**

SEA is a systematic process of predicting and evaluating the likely environmental effects of implementing a proposed plan, or other strategic action, in order to ensure that these effects are appropriately addressed at the earliest appropriate stage of decision-making on a par with economic, social and other considerations.

## **Why is SEA needed? The Benefits**

SEA is the planning authority's and the public's guide to what are generally the best areas for development in the town.

SEA enables the planning authority to direct development towards robust, well-serviced and connected areas in the town – thereby facilitating the general avoidance of incompatible development in the most sensitive, least well-serviced and least well-connected areas, in the town and beyond.

SEA provides greater certainty to the public and to developers. Plans are more likely to be adopted without delays or challenges and planning applications are more likely to be granted permission. Environmental mitigation is more likely to cost less.

The Plan directs incompatible development away from the most sensitive areas in the town and focuses on directing compact, sustainable development within the existing envelope of the Plan area. Development of these generally more robust, well-serviced and well-connected areas of the town will contribute towards environmental protection and sustainable development, including climate mitigation and adaptation.

Compact development can be accompanied by placemaking initiatives to enable the town to become a more desirable place to live – so that it maintains populations and services.

Compatible sustainable development in the town's sensitive areas is also provided for, subject to various requirements relating to environmental protection and management being met.

**Difficulties Encountered during the SEA process**

No significant difficulties have been encountered during the undertaking of the assessment to date.

**What happens at the end of the process?**

The SEA Environmental Report prepared for the Draft Plan will be finalised in advance of adoption of the Plan taking into account, among other things, the content of the SEA Environmental Report for the Proposed Material Alterations to which this Non-Technical Summary relates. An SEA Statement will also be prepared which will summarise, inter alia, how environmental considerations have been integrated into the Plan.

## **Section 2 The Draft Plan to which the Proposed Material Alterations relate**

### **2.1 Introduction**

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

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

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

### **2.2 Content of the Draft Plan**

The LAP sets out an overall strategy for the proper planning and sustainable development of Athenry in the context of Project Ireland 2040, the National Planning Framework, the Regional Spatial and Economic Strategy for the Western and Northern Region and the Galway County Development Plan. It is informed by Ministerial Guidelines issued pursuant to Section 28 of the Act together with EU requirements regarding SEA and AA.

The LAP is set out across three sections as follow:

- Section 1: This section contains the Written Statement for the LAP, which includes a zoning matrix table, the development strategy for the life of the Plan and a suite of Policy Objectives.
- Section 2: This section contains the Land Use Zoning and Strategic Flood Risk Assessment Maps.
- Section 3: Local Transport Plan.

### **2.3 Strategic Aims**

As identified in the Plan, the town will fulfil its role identified in the RSES to bring investment into the local economy and also provide employment opportunities in the town and surrounding regions. This can be achieved through the following aims:

- Realising Athenry's potential as a "Town of Strategic Potential" as set out in the GCDP 2022 – 2028 and attracting the population target established in the Core Strategy/Settlement Strategy up to 2028 and beyond;
- The Strategic Economic Corridor will continue to be developed, promoted and serviced to a high international standard to attract Foreign Direct Investment, building on a strategic location and infrastructure;
- Secure the delivery of compact growth with critical mass in a consolidated plan area;
- Promote the reuse of existing buildings along with a sustainable level of densities as appropriate depending on the character of the receiving environment and access to services and critical infrastructure such as sustainable means of mobility;
- Support investment in regeneration and other town centre improvement works to maintain Athenry as an attractive place to live, work and visit;
- Focus on the town's historic role as a major employment centre in east County Galway by supporting economic potential and investment in appropriately zoned locations;
- Provide future residential and employment development in Athenry with supporting services and infrastructure as appropriate, including retail, community and amenity areas;

- Encourage the promotion of sustainable mobility, including walking and cycling, under the aspirations of the Local Transport Plan and support the continued provision of investment in public transport;
- Providing a variety of facilities, amenities, and support services for children, youths, adults, and the elderly, including educational, recreational, religious, social, community, and civic needs, to serve a growing community and promote an inclusive and cohesive local community;
- Optimising the potential of Athenry in encouraging & fostering appropriate economic/tourism development while enhancing the town as a place of employment by setting a positive & flexible framework for the creation of new employment opportunities;
- Protecting the natural assets, environment, built heritage and public realm of the town including Athenry's unique medieval walled town character and amenities for the benefit of future generations to come.

## 2.4 Proposed Material Alterations

The Proposed Material Alterations are outlined in detail in the accompanying Proposed Material Alteration document. The Alteration Numbers or descriptions provided in this report can be used to locate the associated detail in the accompanying Proposed Material Alteration document.

Alterations proposed include those relating to maps, including land use zoning, and text.

The Proposed Material Alterations were screened for the need to undertake SEA and the alterations below were determined as requiring full SEA. The SEA Screening Determination accompanies this SEA Environmental Report and the Proposed Material Alterations document. Appendix II to this SEA Environmental Report comprises the SEA Screening Report that was prepared to inform the Determination. Proposed Material Alterations requiring SEA and consideration in this SEA Environmental Report are as follows<sup>1</sup>:

- MA40
- MA41
- MA42
- MA43
- MA46
- MA47
- MA49
- MA51
- MA57
- MA65

## 2.5 Strategic work undertaken by the Council to ensure contribution towards environmental protection and sustainable development

Far in advance of the placing of the Draft Plan on public display, Galway County Council undertook various works in order to inform the preparation of the Plan.

The findings of this strategic work have been integrated into the Plan and will contribute towards both environmental protection and management and sustainable development.

The undertaking of this SEA process was part of this strategic work and contributed towards the integration of environmental considerations into individual Plan provisions.

---

<sup>1</sup> For detail, please refer to Proposed Material Alterations document.

## **2.6 Relationship with other relevant Plans and Programmes**

It is acknowledged that many of the major issues affecting Athenry's development are contingent on national policy and government funding.

The Draft Plan, to which the Proposed Material Alterations relate, sits within a hierarchy of statutory documents setting out public policy for, among other things, land use planning, infrastructure, sustainable development, tourism, environmental protection and environmental management. The Plan must comply with relevant higher-level strategic actions and may, in turn, guide lower-level strategic actions. These documents include plans and programmes such as those referred to throughout this summary. These documents have been subject to their own environmental assessment processes, as relevant.

The National Planning Framework (NPF) sets out Ireland's planning policy direction up to 2040. The NPF is to be implemented through Regional Spatial and Economic Strategies (RSESs) and lower tier Development Plans and Local Area Plans. The RSES for the Western and Northern Region sets out objectives for land use planning, tourism, infrastructure, sustainable development, environmental protection and environmental management that have been subject to environmental assessment and must be implemented through the Galway County Development Plan 2022-2028, which sets out the overarching development strategy for the County, and the Local Area Plan.

In order to be realised, projects included in the Local Area Plan (in a similar way to other projects from any other sector) will have to comply, as relevant, with various legislation, policies, plans and programmes (including requirements for lower-tier Appropriate Assessment, Environmental Impact Assessment and other licencing requirements as appropriate) that form the statutory decision-making and consent-granting framework.

## Section 3 The Environmental Baseline

### 3.1 Introduction

The summary of the environmental baseline of the Plan area is described in this section. This baseline together with the Strategic Environmental Objectives, which are identified in Section 3.11, is used in order to identify, describe and evaluate the likely significant environmental effects of implementing the Draft Plan and in order to determine appropriate monitoring measures.

### 3.2 Likely Evolution of the Environment in the Absence of the Draft Plan and associated Proposed Material Alterations

In the absence of a new Local Area Plan, to which the Proposed Material Alterations relate, the framework for development across the Plan area would be provided by the County Development Plan and other related documents. There would be no Local Area Plan to provide additional detail beyond that provided already through the existing planning framework as how to achieve sustainable development and environmental protection and management in the town.

As a result, there would be both:

- A decreased likelihood in the extent, magnitude and frequency of the positive environmental effects identified by this assessment occurring; and
- An increased likelihood in the extent, magnitude and frequency of the adverse environmental effects identified by this assessment occurring.

### 3.3 Biodiversity and Flora and Fauna

Key ecological sensitivities within and surrounding the Plan area include:

- Aquatic and riverine ecology associated with the rivers and streams, including the River Clarin, its tributaries and riparian buffer zones; and
- Locally important habitats, including: various trees, woodlands, parks, gardens, hedgerows, old buildings/stone walls and lands used for agriculture within and surrounding the Plan area, providing habitats for flora and fauna and facilitating linkages and corridors to the surrounding countryside for the wildlife; and
- Ecologically designated sites within 15 km of the Plan area, including: Monivea Bog Special Area of Conservation and proposed Natural Heritage Area (c. 5 km to the north-east of the Plan area); Rahasane Turlough Special Area of Conservation, Special Protection Area and proposed Natural Heritage Area (c. 6 km to the south of the Plan area); Lough Corrib SAC (c. 6 km to the north-west of the Plan area); Galway Bay Complex Special Area of Conservation and proposed Natural Heritage Area (c. 8 km to the south-east to the Plan area); and Inner Galway Bay Special Protection Area (c. 8 km to the south-east to the Plan area).

Designated sites in the wider area include Special Areas of Conservation<sup>2</sup> (SACs) and Special Protection Areas<sup>3</sup> (SPAs). These are mapped on Figure 3.1. There are no SACs or SPAs designated within the Plan area; however, there are a total of 14 European sites (nine SACs and five SPAs) within 15 km of the Plan boundary.

CORINE<sup>4</sup> land cover mapping is shown on Figure 3.2 and identifies the land cover of the Plan area as urban fabric. Surrounding areas are identified as either pastures or lands principally occupied by agriculture with significant areas of natural vegetation.

<sup>2</sup> SACs have been selected for protection under the European Council Directive on the conservation of natural habitats and of wild fauna and flora (92/43/EEC) due to their conservation value for habitats and species of importance in the European Union. The Habitats Directive seeks to establish Natura 2000, a network of protected areas throughout the EU. It is the responsibility of each member state to designate SACs to protect habitats and species, which, together with the SPAs designated under the 1979 Birds Directive, form Natura 2000. The European Communities (Birds and Natural Habitats) Regulations 2011 consolidate the European Communities (Natural Habitats) Regulations 1997 to 2005 and the European Communities (Birds and Natural Habitats) (Control of Recreational Activities) Regulations 2010. The Regulations have been prepared to address several judgments of the Court of Justice of the European Union (CJEU) against Ireland, notably cases C-418/04 and C-183/05, in respect of failure to transpose elements of the Birds Directive and the Habitats Directive into Irish law.

<sup>3</sup> SPAs have been selected for protection under the 1979 European Council Directive on the Conservation of Wild Birds (79/409/EEC) - referred to as the Birds Directive - due to their conservation value for birds of importance in the EU.

<sup>4</sup> The CORINE (Coordinated Information on the Environment) land cover data series was devised as a means of compiling geo-spatial environmental information in a standardised and comparable manner. CORINE has become a key data source for informing environmental and planning policy on a national and European level. The main land cover type in Ireland is agricultural land including forestry, which accounts for two-thirds of the national landmass. Most of this is permanent grassland pastures. Peatlands and wetlands are the second most widespread land cover type, covering almost one-



## Existing Problems

Ireland's Article 17 report on the Status of EU Protected Habitats and Species in Ireland (DCHG, 2019) identifies various Irish, EU-protected habitats and species to be of unfavourable status and many to be still declining, although it also identifies that a range of positive actions are underway. Categories for pressures and threats on Ireland's habitats and species identified by the report comprise:

- Agriculture;
- Forestry;
- Extraction of resources (minerals, peat, non-renewable energy resources);
- Energy production processes and related infrastructure development;
- Development and operation of transport systems;
- Development, construction and use of residential, commercial, industrial and recreational infrastructure and areas;
- Extraction and cultivation of biological living resources (other than agriculture and forestry);
- Military action, public safety measures, and other human intrusions;
- Alien and problematic species;
- Mixed source pollution;
- Human-induced changes in water regimes;
- Natural processes (excluding catastrophes and processes induced by human activity or climate change);
- Geological events, natural catastrophes;
- Climate change; and
- Unknown pressures, no pressures and pressures from outside the Member State.

The Plan includes measures to contribute towards the protection of biodiversity and flora and fauna and associated ecosystem services.

Previous changes in land uses arising from human development have resulted in a loss of biodiversity and flora and fauna however, legislative objectives governing biodiversity and fauna were not identified as being conflicted with.

## 3.4 Population and Human Health

Census 2016 recorded a population of 4,445 persons in Athenry, an increase of 495 persons from the 2011 Census figure. The Core Strategy in the Galway County Development Plan 2022-2028 has allocated a population increase of 1,350 persons for Athenry over the Plan period.

Athenry is identified as a "Strategic Potential Area" within the Galway County Development Plan 2022-2028. A "Strategic Potential Area" is a large economically active town that provides employment opportunities for the surrounding areas<sup>5</sup>.

The population provided for in the Plan will interact with various environmental components. Potential interactions include:

- Recreational and development pressure on habitats and landscapes;
- Contribution towards increase in demand for waste water treatment at the municipal level;
- Contribution towards increase in demand for water supply and associated potential impact of water abstraction;
- Potential interactions in flood-sensitive areas; and
- Potential effects on water quality.

Human health has the potential to be impacted upon by environmental vectors (i.e. environmental components such as air, water or soil through which contaminants or pollutants, which have the potential to cause harm, can be transported so that they come into contact with human beings). Hazards or nuisances to human health can arise as a result of exposure to these vectors arising from incompatible adjacent land uses for example. These factors have been considered with regard to the description of: the baseline of each environmental component; and the identification and evaluation of the likely significant environmental effects of implementing the Plan.

## Existing Problems

The number of homes within the Plan area with radon levels above the reference level is within the normal range experienced in other locations across the country.

---

fifth of the country. While forested areas cover about one-tenth of the country. Despite rapid development in the past two decades, Ireland's landscape is predominantly rural and agricultural.

<sup>5</sup> Galway County Development Plan 2022-2028

Parts of the Plan area are vulnerable to adverse effects from changes in the occurrence of severe rainfall events and associated flooding from surface water. Flooding in certain circumstances could pose a risk to human health. There is historic and predictive evidence of flooding within the Plan area.

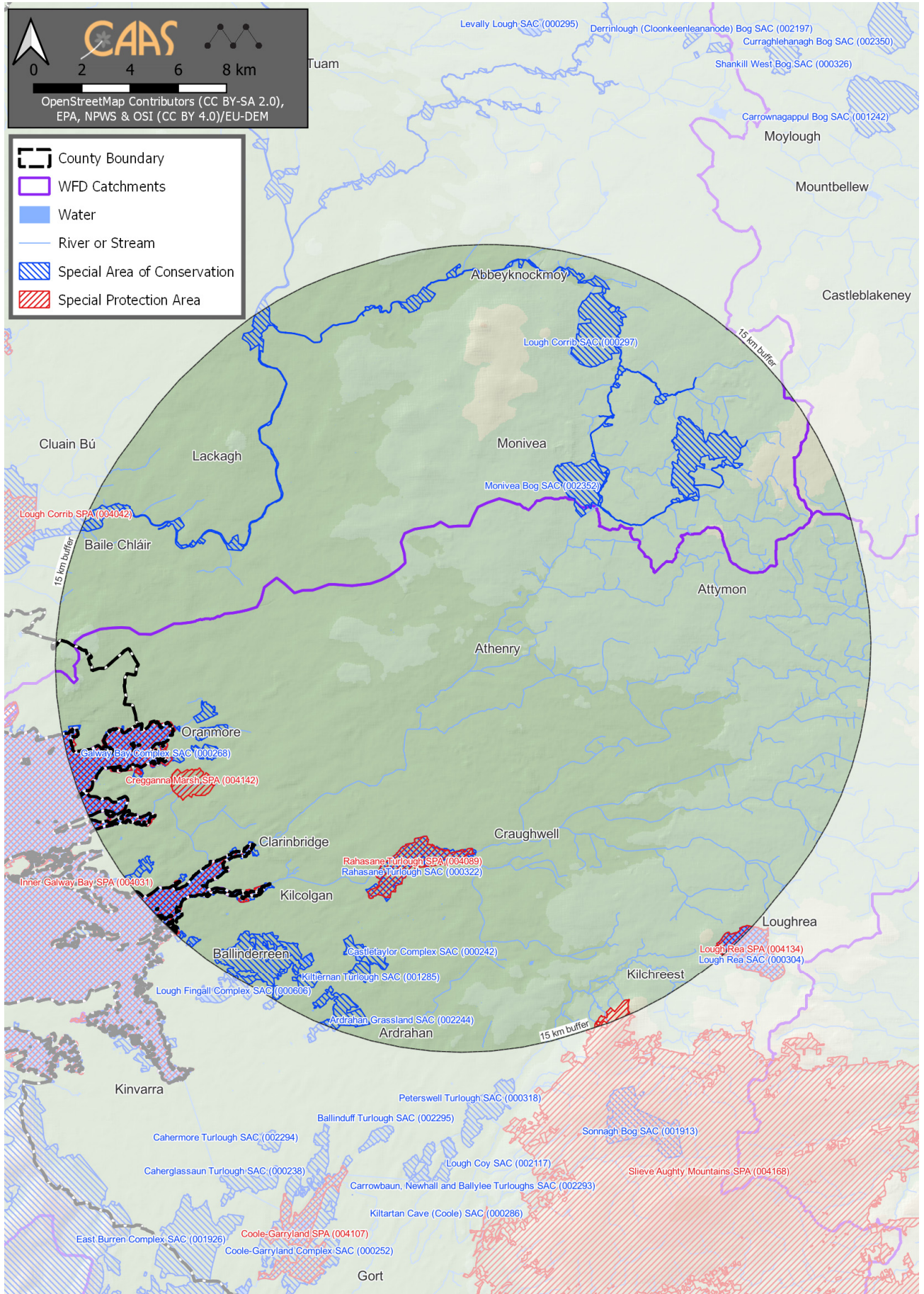
### **3.5 Soil**

Main soil types surrounding the built-up areas of Athenry are brown earths (generally fertile soils, widely used for agriculture and associated with significant accumulation of clay).

The GSI have identified<sup>6</sup> the Plan area as having mainly low levels of landslide susceptibility.

---

<sup>6</sup> <https://www.gsi.ie/en-ie/programmes-and-projects/geohazards/projects/Pages/Landslide-Susceptibility-Mapping.aspx>  
CAAS for Galway County Council



**Figure 3.1 European Sites within and within 15 km buffer of Athenry Plan area**



**Figure 3.2 CORINE Land Cover Mapping 2018**

## 3.6 Water

### Surface and Ground Water Status

Surface water at and around the Plan area is channelled by rivers, streams and their tributaries, including the River Clarin (Clarinbridge) flowing from north-east to south-west through the centre of the town, before merging with another tributary in the south of the Plan area.

The current WFD (2016-2021) status<sup>7</sup> of the River Clarin draining the Plan area is identified as being *moderate* (sections of the River Clarin: Clarinbridge\_020 and Clarinbridge\_030) and *poor* downstream of the Plan area (section of the River Clarin: Clarinbridge\_040). Subject to exemptions provided for by Article 4 of the WFD, these water bodies will need improvement in order to comply with the objectives of the WFD. Figure 3.3 illustrates the WFD surface water status within and surrounding the Plan area. The River Clarin intersecting the Plan area is currently identified in the combined 2016-2021 data as being at risk of not meeting the WFD's objectives due to the damage being caused by significant pressures related to urban wastewater<sup>8</sup>, which may include direct discharge of nutrients from urban wastewater treatment plants and discharge from combined storm overflows or storm water overflows. Discharges of elevated concentrations of phosphorus, ammonium and nitrogen can impact on the ecology of surface waters. However, the status relates to the combined 2016-2021 period and an upgrade to the Athenry Wastewater Treatment Plant has been completed in recent years. The upgrade has resulted in a plant that will provide improved wastewater discharge standards, ensuring compliance with the requirements of the Urban Wastewater Treatment Directive and helping to protect the Clarin River.

The WFD status (2016-2021) of all groundwater underlying the Plan area is currently identified as being of *good status*, meeting the objectives of the Water Framework Directive.

### Aquifer Vulnerability and Productivity

Aquifer vulnerability refers to the ease with which pollutants of various kinds can enter into groundwater. The aquifers underlying the Plan area are as a mix of vulnerabilities:

- *High and Extreme vulnerability* and *Extreme (Rock at or near surface or karst)*, areas within and surrounding the River Clarin and within the central parts of the Plan area; and
- *Moderate and low vulnerability*, adjacent to and surrounding the central, north-western and southern parts of the Plan area.

### Flooding

A Strategic Flood Risk Assessment (SFRA) document accompanies this SEA Environmental Report and the Draft Plan. Requirements in relation to SFRA are provided under 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (Department of Environment and Office of Public Works, 2009) and associated Department of the Environment, Community and Local Government Circular PL2/2014.

Flood risk management and drainage provisions are already in force through the County Development Plan and related provisions have been integrated into the LAP. In addition, land use zoning contained within the Draft Plan has been informed by the SFRA process and associated delineation of flood risk zones.

Historical flooding is documented by the Office of Public Works. The most significant source of flood risk within the Plan area is from fluvial (from rivers/streams) however there are other sources of flooding present including those from groundwater, pluvial (from rainwater) and surface drainage systems.

Predictive flood risk mapping is also available from the Office of Public Works and is included in the SFRA document that accompanies the Plan.

<sup>7</sup> As per EPA's WFD Status 2016-2021 classification (<https://gis.epa.ie/EPAMaps/>).

<sup>8</sup> <https://gis.epa.ie/EPAMaps/Water>



**Figure 3.3 Surface Water Status (2016-2021)**

### 3.7 Air and Climatic Factors

Climate mitigation describes the action to reduce the likelihood of climate change occurring or reduce the impact if it does occur. This can include reducing the causes of climate change (e.g. emissions of greenhouse gases) as well as reducing future risks associated with climate change.

The National Climate Action Plan 2023 (the second annual update to Ireland's Climate Action 2019) provides a detailed plan for taking decisive action to achieve a 51% reduction in overall greenhouse gas emissions by 2030 and setting Ireland on a path to reach net-zero emissions by no later than 2050, as committed to in the Programme for Government and set out in the Climate Act 2021. The Plan (a supplementary Annex of Actions to the 2023 Plan will be published early in 2023) lists the actions needed to deliver on climate targets and sets indicative ranges of emissions reductions for each sector of the economy. It will be updated periodically, to ensure alignment with legally binding economy-wide carbon budgets and sectoral ceilings.

Climate adaptation is a change in natural or human systems in response to the impacts of climate change. These changes moderate harm or exploit beneficial opportunities and can be in response to actual or expected impacts.

The National Adaptation Framework Department of Communications, Climate Action and Environment, 2018), sets out the national strategy to reduce the vulnerability of the country to the negative effects of climate change and to avail of positive impacts. The National Adaptation Framework outlines a whole of government and society approach to climate adaptation. Under the Framework, a number of Government Departments will be required to prepare sectoral adaptation plans in relation to a priority area that they are responsible for.

The Galway County Council Climate Change Adaptation Strategy 2019-2024 features a range of actions across sectors including: seafood, agriculture, forestry, biodiversity, built and archaeological heritage, transport infrastructure, electricity and gas networks, communication networks, flood risk management, water quality, water services infrastructure and health. The Strategy seeks to:

- Improve education, awareness-raising and capacity on climate change, adaptation (and mitigation), impact reduction and early warning across the Council, businesses, communities and individuals;
- Integrate climate change measures into policies, strategies and planning, as well as the identification of areas at risk to inform planning and decision making; and
- Strengthen resilience and adaptive capacity and develop and implement co-ordinated responses to climate risk where needed.

The EPA's (2022) *Air Quality in Ireland 2021* identifies that:

- Air quality in Ireland is generally good, however, there are localised issues.
- Ireland met all of its EU legal requirements in 2021 but it failed to meet the new WHO-based guideline levels for Health in 2021.
- Air quality monitoring results in 2021 showed that fine particulate matter (PM<sub>2.5</sub>) mainly from burning solid fuel, and nitrogen dioxide (NO<sub>2</sub>) mainly from road transport, remain the main threats to good air quality.
- It is estimated that there are approximately 1,300 premature deaths annually in Ireland due to poor air quality from fine particulate matter (PM<sub>2.5</sub>).

With regards to solutions, the report identifies that:

- Ireland and Europe should move towards achieving the health-based WHO air quality guidelines.
- The planned National Clean Air Strategy for Ireland needs to be published and fully implemented.
- Local Authorities must provide more resources to increase air enforcement activities.
- National investment in clean public transport is needed across the country.

### 3.8 Material Assets

Other material assets, in addition to those referred to below, covered by the SEA include archaeological and architectural heritage (see Section 3.9) natural resources of economic value, such as water and air (see Sections 3.6 and 3.7).

#### Public Assets and Infrastructure

Public assets and infrastructure that have the potential to be impacted upon by the Plan, if unmitigated, include: the town of Athenry; resources such as public open spaces, parks and recreational areas; public

buildings and services; transport and utility infrastructure (electricity, gas, telecommunications, water supply, waste water infrastructure etc.); and natural resources that are covered under other topics such as water and soil.

### **Waste Water**

The Athenry WWTP (Registration No. D193-01) is currently not compliant with the Emission Limit Values (ELVs) set in the Wastewater Discharge Licence in the most recent available Annual Environmental Report 2021 (published in May 2022).<sup>9</sup>

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 helping to protect the Clarin River. Ultimately these works have resulted in the plant operating beyond its original capacity. The upgraded wastewater treatment plant now has the capacity for a population of 9,500 allowing Athenry to accommodate future population growth and economic development.<sup>10</sup>

### **Water Supply**

Irish Water is responsible for providing and maintaining adequate public water supply infrastructure throughout County Galway.

Athenry is located within the Mid-Galway Water Resource Zone<sup>11</sup> and as identified by Irish Water, there is capacity available to meet targeted population growth by 2031<sup>12</sup>.

The Tuam Regional Water Supply Scheme provides water to Athenry RWSS with water supplied by Luimnagh Water Treatment Plant, which produces approximately 26-30,000 m<sup>3</sup>/day of water with spare headroom of 18,000 m<sup>3</sup>/day<sup>13</sup>. In 2021, a project to integrate two water treatment plants in Loughrea with the Tuam RWSS was significantly finished.<sup>14</sup>

### **Waste Management**

Waste management within the Plan area is guided by the Connacht-Ulster Region Waste Management Plan 2015-2021. The Plan provides a framework for the prevention and management of waste in a sustainable manner in 10 local authority areas, including Galway County Council.

### **Transport**

Athenry is strategically located near national roads M6, M17, and M18 which provides important access and links to Galway, Limerick, Dublin, throughout the County and adjoining counties. Athenry is also served by the Dublin Heuston – Galway, Galway – Limerick and the Waterford – Limerick train lines with daily train routes. Bus services are also provided by Local Link and private bus companies with routes to Galway and Loughrea. National, regional and local roads provide vital links between the towns and villages to retail, service and employment centres throughout the County and to adjoining counties.

A Local Transport Plan (LTP) has been integrated into the Plan to help ensure a shift towards more sustainable modes of transport.

### **Existing Problems**

The provisions of the Plan will contribute towards protection of the environment with regard to impacts arising from material assets.

The provisions of infrastructure and supporting services for development, particularly water and wastewater services, is critical.

---

<sup>9</sup>[http://epawebapp.epa.ie/licences/lic\\_eDMS/090151b280\\_82cd2d.pdf](http://epawebapp.epa.ie/licences/lic_eDMS/090151b280_82cd2d.pdf)

<sup>10</sup> Draft Athenry Local Area Plan 2023-2029

<sup>11</sup> A Water Resource Zone (WRZ) is an independent water supply system serving a region, city, town or village and is governed by topography or the extent of the water distribution network in an area. A WRZ may include multiple Water Treatment Plants and/or sources.

<sup>12</sup>Source:<https://www.water.ie/connections/developer-services/capacity-registers/water-supply-capacity-register/galway/>(Published in March 2022).

<sup>13</sup> <https://www.epa.ie/publications/compliance-enforcement/drinking-water/audit-reports/galway/Audit-Report-Tuam-18.09.19.pdf>

<sup>14</sup> Draft Athenry Local Area Plan 2023-2029



## 3.9 Cultural Heritage

### Archaeological Heritage

The Record of Monuments and Places (RMP) is an inventory, put on a statutory basis by amendment to the National Monuments Act 1994, of sites and areas of archaeological significance, numbered and mapped. It is available from the National Monuments Service and at [archaeology.ie](http://archaeology.ie).

The town of Athenry is considered a significant heritage asset on account of numerous sites and monuments which are identified for preservation. Of particular importance are the town walls and flanking towers which are of international importance.

There are various Zones of Notification designated within Athenry, with entries to the Sites and Monuments Record (SMR) and Record of Monuments and Places (RMP), including two National Monuments in State Ownership: Athenry Abbey; and the Athenry Castle (an Anglo-Norman masonry castle built in 13<sup>th</sup> century on the west bank of the River Clarin).

### Architectural Heritage

The compact town of Athenry, which lies within the historical town walls is characterised by narrow radial streets which converge on Market Square and has a unique character that is derived from the combination of buildings of significant architectural and historical value and simple vernacular architecture. Notable Protected Structures include: the Town Walls and Gateway; Athenry Heritage Centre; Athenry House; Athenry Railway Station; and the Market Cross.

An Architectural Conservation Area (ACA) is a place, area, group of structures or townscape, which is of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest or contributes to the appreciation of a Protected Structure. An ACA may or may not include Protected Structures. In an ACA, protection is placed on the external appearance of such areas or structures. There is currently one ACA designated in Athenry, namely Athenry Town Centre ACA.

### Existing Problems

The context of archaeological and architectural heritage has changed over time however no existing conflicts with legislative objectives governing archaeological and architectural heritage have been identified.

## 3.10 Landscape

Athenry is a medieval town and lies within a relatively flat area with predominantly agricultural land surrounding the town. The River Clarin flows across the central parts of the Plan area.

### 3.10.1 Landscape Character Assessment

The European Landscape Convention was ratified in Ireland in 2002, this required EU Member States to adopt national measures to promote landscape, planning, protection and management. The purpose of landscape character assessment is to provide the foundation for policy formulation and decision making for landscape management.

There are a range of different landscapes found in the Plan area, each with varying visual and amenity values, topography, exposure levels and each containing a variety of habitats. Each landscape type has varying capacity to absorb development related to its overall sensitivity.

The Galway County Development Plan 2022-2028 and associated County Galway Landscape Character Assessment (LCA) 2022 The existing Galway County Development Plan 2022-2028 identifies three Landscape Regions, which include ten Landscape Character Types (subdivided into smaller Landscape Character Units), 52 Viewing Points and seven Scenic Routes within the Council's administrative area. The Plan area falls under the 'Eastern Plains' Landscape Region, the 'Urban Environs', 'Central Galway Complex' and partially the 'North Galway Complex' Landscape Character Types and the 'Urban Environs', 'Southern River Clare Basin' and 'North River Clare Basin' Landscape Character Units. There are no Protected Views or Scenic Routes designated within the Plan area.

A landscape's capacity to absorb new development, without exhibiting a significant alteration of character or change of appearance is referred to as its 'sensitivity'. The Galway County Development Plan 2022-2028 and associated LCA 2022 outlined four separate sensitivity classes for County Galway (low, high, special and iconic). According to this classification the area surrounding Athenry falls under "Class 1 – low: unlikely to be adversely affected by change".

### Existing Environmental Problems

New developments have resulted in changes to the visual appearance of lands within the Plan area however legislative objectives governing landscape and visual appearance were not identified as being conflicted with.

## 3.11 Strategic Environmental Objectives

Strategic Environmental Objectives (SEOs) are methodological measures developed from policies that generally govern environmental protection objectives established at international, Community or Member State level e.g. the environmental protection objectives of various European Directives that have been transposed into Irish law and which are required to be implemented.

The SEOs are set out under a range of topics (see Table 3.1) and are used as standards against which the provisions of the Draft Plan, the Proposed Material Alterations and the alternatives are evaluated in order to help identify which provisions would be likely to result in significant environmental effects and where such effects would be likely to occur, if – in the case of adverse effects – unmitigated.

**Table 3.1 Strategic Environmental Objectives**

Environmental Component	SEO Code	Guiding Principle	Strategic Environmental Objectives
<b>Biodiversity, Flora and Fauna</b>	BFF	No net contribution to biodiversity losses or deterioration	<ul style="list-style-type: none"> <li>To preserve, protect, maintain and, where appropriate, enhance the terrestrial, aquatic and soil biodiversity, particularly EU designated sites and protected species</li> <li>Ensure no adverse effects on the integrity of any European site, with regard to its qualifying interests, associated conservation status, structure and function</li> <li>Safeguard national, regional and local designated sites and supporting features which function as stepping stones for migration, dispersal and genetic exchange of wild species</li> <li>Enhance biodiversity in line with the National Biodiversity Strategy and its targets</li> <li>To protect, maintain and conserve the County's natural capital</li> </ul>
<b>Population and Human Health</b>	PHH	Improve quality of life for all ages and abilities based on high-quality, serviced, well connected and sustainable residential, working, educational and recreational environments	<ul style="list-style-type: none"> <li>Promote economic growth to encourage retention of working age population and funding of sustainable development and environmental protection and management</li> <li>Ensure that existing population and planned growth is matched with the required public infrastructure and the required services</li> <li>Safeguard the County's citizens from environment-related pressures and risks to health and well-being</li> </ul>
<b>Soil (and Land)</b>	S	Ensure the long-term sustainable management of land	<ul style="list-style-type: none"> <li>Protect soils against pollution, and prevent degradation of the soil resource</li> <li>Promote the sustainable use of infill and brownfield sites over the use of greenfield within the County</li> <li>Safeguard areas of prime agricultural land and designated geological sites</li> </ul>
<b>Water</b>	W	Protection, improvement and sustainable management of the water resource	<ul style="list-style-type: none"> <li>Ensure that the status of water bodies is protected, maintained and improved in line with the requirements of the Water Framework Directive</li> <li>Ensure water resources are sustainably managed to deliver proposed regional and County growth targets in the context of existing and projected water supply and wastewater capacity constraints ensuring the protection of receiving environments</li> <li>Avoid inappropriate zoning and development in areas at risk of flooding and areas that are vulnerable to current and future erosion, particularly coastal areas</li> <li>Integrate sustainable water management solutions (such as SuDS, porous surfacing and green roofs) into development proposals</li> </ul>
<b>Material Assets</b>	MA	Sustainable and efficient use of natural resources	<ul style="list-style-type: none"> <li>Optimise existing infrastructure and provide new infrastructure to match population distribution proposals in the County - this includes transport infrastructure</li> <li>Ensure access to affordable, reliable, sustainable and modern energy for all which encourages a broad energy generation mix to ensure security of supply – wind, solar, hydro, biomass, energy from waste and traditional fossil fuels</li> </ul>

Environmental Component	SEO Code	Guiding Principle	Strategic Environmental Objectives
			<ul style="list-style-type: none"> <li>• Promote the circular economy, reduce waste, and increase energy efficiencies</li> <li>• Ensure there is adequate sewerage and drainage infrastructure in place to support new development</li> <li>• Reduce the energy demand from the transport sector and support moves to electrification of road and rail transport modes</li> <li>• Encourage the transition to a zero-carbon economy by facilitating the development of a grid infrastructure to support renewables and international connectivity. Reduce the average energy consumption per capita including promoting energy efficient buildings, retrofitting, smart- buildings, cities and grids</li> </ul>
<b>Air</b>	<b>A</b>	Support clean air policies that reduce the impact of air pollution on the environment and public health	<ul style="list-style-type: none"> <li>• To avoid, prevent or reduce harmful effects on human health and the environment as a whole resulting from emissions to air from all sectors with particular reference to emissions from transport, residential heating, industry and agriculture</li> <li>• Maintain and promote continuing improvement in air quality through the reduction of emissions and promotion of renewable energy and energy efficiency</li> <li>• Promote continuing improvement in air quality</li> <li>• Reduction of emissions of sulphur dioxide, nitrogen oxides, volatile organic compounds, ammonia and fine particulate matter which are responsible for acidification, eutrophication and ground-level ozone pollution</li> <li>• Meet Air Quality Directive standards for the protection of human health — Air Quality Directive</li> <li>• Significantly decrease noise pollution by 2020 and move closer to WHO recommended levels</li> </ul>
<b>Climatic Factors</b>	<b>C</b>	Achieving transition to a competitive, low carbon, climate-resilient economy that is cognisant of environmental impacts	<ul style="list-style-type: none"> <li>• To minimise emissions of greenhouse gasses</li> <li>• Integrate sustainable design solutions into the County's infrastructure (e.g. energy efficient buildings; green infrastructure)</li> <li>• Contribute towards the reduction of greenhouse gas emissions in line with national targets</li> <li>• Promote development resilient to the effects of climate change</li> <li>• Promote the use of renewable energy, energy efficient development and increased use of public transport</li> </ul>
<b>Cultural Heritage</b>	<b>CH</b>	Safeguard cultural heritage features and their settings through responsible design and positioning of development	Protect places, features, buildings and landscapes of cultural, archaeological or architectural heritage
<b>Landscape</b>	<b>L</b>	Protect and enhance the landscape character	To implement the Plan's framework for identification, assessment, protection, management and planning of landscapes having regard to the European Landscape Convention

## **Section 4 Alternatives**

### **4.1 Introduction**

The SEA Directive requires that reasonable alternatives (taking into account the objectives and the geographical scope of the plan or programme) are identified, described and evaluated for their likely significant effects on the environment. Summaries of the alternatives for the Draft Plan and their assessment are provided below.

### **4.2 Limitations in Available Alternatives**

The Plan is required to be prepared by the existing, already in force, Galway County Development Plan 2022-2028 and the Planning and Development Act 2000 (as amended), which specifies various types of objectives that must be provided for by the Plan.

The alternatives available for the Plan are significantly limited by the provisions of higher-level planning objectives, including those of the National Planning Framework (NPF), the Regional Spatial and Economic Strategy (RSES) for the Western and Northern Region and the County Plan. These documents set out various requirements for the content of the Plan including on topics such as land use zoning and the sustainable development of settlements.

### **4.3 Type 1: Alternatives Already Considered**

The preparation of the County Development Plan and associated SEA process already considered various different types of alternatives, including those relating to population allocations, which were integrated into that Plan and which set requirements for lower tier planning in the County.

### **4.4 Type 2: Land Use Zoning Alternatives**

#### **Alternative Type 2 (i): "More Consolidated, More Compact"**

The more compact, serviced/serviceable land and infrastructure assessment approach under this alternative would allow for water supply, waste water, compact growth, public transport and co-ordinated development considerations to be integrated into the Plan to the highest degree.

The infrastructure required to be in place to achieve the growth targets is already in place or planned under this alternative.

The development of the Town Centre would be more compact and sustainable under this scenario and would support the longer-term viability of the settlement. 30% of Residential units would be expected on Town Centre lands.

Opportunity sites identified with clear design and proposed uses identified – making successful applications for the sustainable, compact development of the town more likely.

The approach under Alternative Type 2 (i): "More Compact Development" would benefit the protection of various environmental components. Although potentially adverse effects associated with land use development would exist, they would be mitigated to a significant degree.

### **Alternative Type 2 (ii): “Less Consolidated, Less Compact”**

By not following a more compact, serviced/serviceable land and infrastructure assessment approach, this alternative would not allow for water supply, waste water, compact growth, public transport and co-ordinated development considerations to be integrated into the Plan to the highest degree.

Additional infrastructure would be required to accommodate sporadic development, more than would be required for Alternative 1 ‘More Compact Development’ and some development may have to be serviced by private waste water treatment systems which would have to be properly maintained.

The development of the Town Centre would be less compact and less sustainable under this scenario and would not optimally support the longer-term viability of the settlement. 30% of Residential units would be less likely to be achieved on Town Centre lands (in comparison with Type 2 (i)).

Opportunity sites are identified but no clear guidance on the design parameters or uses identified – making successful applications for the sustainable, compact development of the town less likely.

An opportunity to mitigate potentially adverse effects arising from land use development to a significant degree would have been missed by the approach under Alternative Type 2 (ii): “Less Compact Development”.

**Selected Alternative for the Draft Plan: Type 2 (i): “More Consolidated, More Compact”; however, certain Proposed Material Alterations (including MA40, MA41, MA42, MA43, MA46, MA47, MA49, MA51 and MA65) would introduce elements of Type 2 (ii): “Less Compact Development”**

## **4.5 Type 3: Alternatives for Transport**

### **Type 3 (i) Low Carbon Corridors and Connections**

Supporting the use of a low carbon corridors and connections within the Plan boundary (Type 3 (i) Alternative A) would facilitate a greater achievement of sustainable modes of transport more likely. This would be likely to improve the potential for meeting important objectives relating to emissions/energy objectives. Applications for such development would be more likely to be granted permission. Project level consideration of environmental impacts and mitigation, including those relating to construction, would need to take place in the context of more detail around potential proposals.

Not explicitly supporting the use of a low carbon corridors and connections within the Plan boundary, would make a greater achievement of the sustainable modes of transport less likely. This would be likely to reduce the potential for meeting important objectives relating to emissions/energy objectives. Applications for such development would be less likely to be granted permission. Project level consideration of environmental impacts and mitigation, including those relating to construction, would need to take place in the context of more detail around potential proposals.

**Selected Alternative: Alternative A**

### **Type 3 (ii) How to provide new transport infrastructure**

The provision of new transport infrastructure, with all additional environmental mitigation left to be defined until project level (Alternative A) would offer the least certainty for environmental protection and management and would be more likely to result in important individual projects (relating to sustainable mobility and emissions objectives) not getting permission.

Specifying environmental constraints (including those related to habitats and potential impacts such as disturbance from lighting – e.g. minimising river crossings, avoiding sensitive habitats, not increasing barriers to flood waters and sustainable design and construction techniques) at Plan level (Alternative B) would offer the most certainty for environmental protection and management and would be more likely to result in important individual projects (relating to sustainable mobility and emissions/energy objectives) receiving permission.

**Selected Alternative: Alternative B**

### **Type 3 (iii) Road Space Capacity**

Reallocating road space would have the potential to change behaviours and would influence the profile of users of the urban centre and mode share of transport. Reallocating road space within Athenry to walking, cycling and public transport to accompany / occur concurrently with the provision of any additional road space capacity that may arise in the future (Type 3 (ii) Alternative A) could take the form of removing traffic from streets, removing lanes of traffic, narrowing carriageways, traffic management measures, or removing on-street parking to provide cycle tracks or widened footpaths. This would benefit efforts to maximise sustainable mobility. This would also facilitate the enhancement of the public realm (including cultural heritage and its context) by contributing towards the replacement of motorised transport modes with more sustainable and non-motorised modes. Project level consideration of environmental impacts and mitigation, including those relating to construction, would need to take place in the context of more detail around proposals. To not accompany the development of additional road space capacity by a corresponding reallocation of road space within Athenry to walking, cycling and public transport (Type 3 (ii) Alternative B) would not benefit efforts to maximise sustainable mobility.

**Selected Alternative: Alternative A**

## Section 5 Summary of Effects arising from Plan

A summary of the likely significant environmental effects arising from the Proposed Material Alterations that were subject to SEA is provided on **Error! Reference source not found.** below.

Appropriate Assessment (AA) Screening and Stage 2 AA are being undertaken alongside the preparation of the Plan, including the Proposed Material Alterations. The requirement for AA is provided under the EU Habitats Directive (Directive 1992/43/EEC). The emerging conclusion of the AA is that the Draft Plan and any Proposed Material Alterations will not affect the integrity of the European Sites, alone or in combination with other plans or projects<sup>15</sup>. The Proposed Material Alterations are accompanied by an AA Natura Impact Report, which has informed this SEA Environmental Report.

Strategic Flood Risk Assessment (SFRA) is being undertaken to inform the preparation of the Draft Plan and the Proposed Material Alterations. The SFRA process has informed this report.

**Table 5.1 Summary of Effects arising from Proposed Material Alterations that were subject to SEA**

Proposed Material Alterations No's. <sup>16</sup>	Commentary
MA40 MA41 MA42 MA43 MA65	<p>As has already been identified in the SEA Environmental Report that was placed on public display alongside the Draft Plan:</p> <ul style="list-style-type: none"> <li>• Environmental considerations, including those relating to ecology, cultural heritage, landscape and water, were integrated into the Draft Plan's zoning through an interdisciplinary approach which was informed by the environmental considerations identified by the SEA, AA and SFRA processes.</li> <li>• Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Western and Northern RSES and Galway County Development Plan 2022-2028.</li> <li>• Flood risk management and drainage provisions are already in force through the County Development Plan and related provisions have been integrated into the LAP. In addition, land use zoning contained within the Draft Plan has been informed by the SFRA process and associated delineation of flood risk zones. The detailed Plan preparation process undertaken by the Planning Department combined with specialist input from the SFRA process facilitated zoning that helps to avoid inappropriate development being permitted in areas of high flood risk.</li> </ul> <p>These Proposed Material Alterations would contribute towards an exceedance of the core strategy allocation for Athenry from the County Development Plan. As a result, they would not provide the most evidence-based framework for development in compliance with the Core Strategy of the County Development Plan and therefore have the potential to undermine sustainable development and proper planning - with potential for associated unnecessary adverse environmental effects on various environmental components, including:</p> <ul style="list-style-type: none"> <li>• Conflict with efforts to maximise sustainable compact growth and sustainable mobility (residual effects would occur)</li> <li>• Adverse impacts upon carbon emission reduction targets in line with local, national and European environmental objectives (residual effects would occur)</li> <li>• Adverse impacts upon the economic viability of providing for public assets and infrastructure (residual effects would occur)</li> <li>• Effects on ecology, ecological connectivity and non-designated habitats and species (residual effects would occur)</li> <li>• Loss of an extent of soil function arising from the replacement of semi-natural land covers with artificial surfaces (residual effects would occur)</li> <li>• Occurrence of visual impacts (residual effects would occur)</li> <li>• Increased risk of flooding</li> <li>• Increased loadings on water bodies</li> </ul> <p>Given the deviation from County Development Plan allocations and the locations of the areas proposed to be zoned, development at these locations would conflict with established higher-level objectives relating to compact growth, sustainable mobility and transition to a low carbon and climate resilient society.</p> <p>As summarised under Section 4 of this report, the selected Land Use Zoning alternative for the Draft Plan is Type 2 (i): "More Consolidated, More Compact"; however, certain Proposed Material Alterations (including MA40, MA41, MA42, MA43, MA46, MA47, MA49, MA51 and MA65) would introduce elements of Type 2 (ii): "Less Compact Development".</p>
MA46 MA47 MA49 MA51	<p>As has already been identified in the SEA Environmental Report that was placed on public display alongside the Draft Plan:</p> <ul style="list-style-type: none"> <li>• Environmental considerations, including those relating to ecology, cultural heritage, landscape and water, were integrated into the Draft Plan's zoning through an interdisciplinary approach which was informed by the environmental considerations identified by the SEA, AA and SFRA processes.</li> <li>• Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Western and Northern RSES and Galway County Development Plan 2022-2028.</li> <li>• Flood risk management and drainage provisions are already in force through the County Development Plan and related provisions have been integrated into the LAP. In addition, land use zoning contained within the Draft Plan has been informed by the SFRA process and associated delineation of flood risk zones. The detailed Plan preparation process undertaken by the Planning Department combined with specialist input from the SFRA process facilitated zoning that helps to avoid inappropriate development being permitted in areas of high flood risk.</li> </ul>

<sup>15</sup> Except as provided for in Article 6(4) of the Habitats Directive, viz. There must be: (a) no alternative solution available, (b) imperative reasons of overriding public interest for the plan to proceed; and (c) adequate compensatory measures in place.

<sup>16</sup> For detail on Proposed Material Alterations please refer to Proposed Material Alterations document.

Proposed Material Alterations No's, <sup>16</sup>	Commentary
	<p>These Proposed Material Alterations would contribute towards an exceedance of the core strategy allocation for Athenry from the County Development Plan. As a result, they would not provide the most evidence-based framework for development in compliance with the Core Strategy of the County Development Plan and therefore have the potential to undermine sustainable development and proper planning. These Proposed Material Alteration would zone more sensitive, less well serviced lands, further away from the established built envelope of the settlement (outside of the Draft Plan boundary) with associated unnecessary potentially significant adverse effects on a variety of environmental components including:</p> <ul style="list-style-type: none"> <li>• Conflict with efforts to maximise sustainable compact growth and sustainable mobility (residual effects would occur)</li> <li>• Adverse impacts upon carbon emission reduction targets in line with local, national and European environmental objectives (residual effects would occur)</li> <li>• Adverse impacts upon the economic viability of providing for public assets and infrastructure (residual effects would occur)</li> <li>• Effects on ecology, ecological connectivity and non-designated habitats and species (residual effects would occur)</li> <li>• Loss of an extent of soil function arising from the replacement of semi-natural land covers with artificial surfaces (residual effects would occur)</li> <li>• Occurrence of visual impacts (residual effects would occur)</li> <li>• Increased risk of flooding</li> <li>• Increased loadings on water bodies</li> </ul> <p>Given the deviation from County Development Plan allocations and the locations of the areas proposed to be zoned, development at these locations would conflict with established higher-level objectives relating to compact growth, sustainable mobility and transition to a low carbon and climate resilient society.</p> <p>As summarised under Section 4 of this report, the selected Land Use Zoning alternative for the Draft Plan is Type 2 (i): "More Consolidated, More Compact"; however, certain Proposed Material Alterations (including MA40, MA41, MA42, MA43, MA46, MA47, MA49, MA51 and MA65) would introduce elements of Type 2 (ii): "Less Compact Development".</p>
MA57	<p>This alteration, to rezone the lands shown in the accompanying Proposed Material Alteration document, from Industrial to Industrial and Open Space/Recreation &amp; Amenity, would be likely to result in an increase in flood risk – including to populations and human health and material assets – and associated adverse effects.</p> <p>MA57 proposes zoning that would not be considered compatible to complying with the Flood Risk Management Ministerial Guidelines (most of this site is located within Flood Zone A<sup>17</sup>).</p> <p>The zonings would fail the Justification Test set out in the 2009 Guidelines as, inter alia, there are alternative lands available elsewhere, in areas of lower risk.</p>

<sup>17</sup> Note that the Flood Zones that accompanied the Draft Plan on public display have been updated to take account of new information that was received during the public display of the Draft Plan and associated documents. Various submissions included photographs of surface water across lands to the immediate east of the existing Clarin Crescent housing estate and north of the rail line. A site visit confirmed that the site is likely to be at significantly elevated risk of flooding from fluvial sources. Flood Zones were amended to take account of the above, aligned to relevant topographical data.



## Section 6 Mitigation and Monitoring Measures

### 6.1 Mitigation

Mitigation measures are measures envisaged to prevent, reduce and, as fully as possible, offset any significant adverse impacts on the environment of implementing the Plan. These measures also apply to Proposed Material Alterations. Various environmental sensitivities and issues have been communicated to the Council through the SEA, Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA) processes. By integrating all related recommendations into the Plan, the Council have helped to ensure that both the beneficial environmental effects of implementing the Draft Plan have been and will be maximised and that potential adverse effects have been and will be avoided, reduced or offset.

Mitigation was achieved through:

- Strategic work undertaken by the Council to ensure contribution towards environmental protection and sustainable development<sup>18</sup>;
- Considering alternatives for the Plan<sup>19</sup>, to which the Proposed Material Alterations relate;
- The integration of environmental considerations into zoning provisions of the Plan<sup>20</sup>, to which the Proposed Material Alterations relate;
- The integration of individual SEA, AA and SFRA provisions into the text of the Plan, to which the Proposed Material Alterations relate; and
- The integration of individual provisions into the text of the County Development Plan.

### 6.2 Monitoring

The SEA Directive requires that the significant environmental effects of the implementation of plans and programmes are monitored. Monitoring is based around indicators that allow quantitative measures of trends and progress over time relating to the Strategic Environmental Objectives identified at Table 3.1 and used in the evaluation. Monitoring indicators, targets, sources and remedial action is provided at Table 6.1 overleaf.

---

<sup>18</sup> Far in advance of the placing of the Draft Plan on public display, Galway County Council undertook various works in order to inform the preparation of the Plan.

The findings of this strategic work have been integrated into the Plan and will contribute towards both environmental protection and management and sustainable development.

The undertaking of this SEA process was part of this strategic work and contributed towards the integration of environmental considerations into individual Plan provisions.

<sup>19</sup> Although strategic alternatives in relation to the content of the Plan were significantly limited for the Plan (see Section 4), as part of the Plan preparation/SEA process, the Council considered a number of alternatives for the Draft Plan, to which the Proposed Material Alterations relate. These alternatives were assessed by the SEA process and the findings of this assessment informed the selection of preferred alternatives, facilitating an informed choice with respect to the type of Plan that was prepared and placed on public display.

<sup>20</sup> Environmental considerations, including those relating to ecology, cultural heritage, landscape and water, were integrated into the Draft Plan's zoning through an interdisciplinary approach which was informed by the environmental considerations identified by the SEA, AA and SFRA processes.

Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Western and Northern RSES and Galway County Development Plan 2022-2028.

Flood risk management and drainage provisions are already in force through the County Development Plan and related provisions have been integrated into the LAP. In addition, land use zoning contained within the Draft Plan has been informed by the SFRA process and associated delineation of flood risk zones. The detailed Plan preparation process undertaken by the Planning Department combined with specialist input from the SFRA process facilitated zoning that helps to avoid inappropriate development being permitted in areas of high flood risk.

**Table 6.1 Indicators, Targets, Sources and Remedial Action**

Environmental Component	SEO Code	Indicators	Targets	Sources	Remedial Action
<b>Biodiversity, Flora and Fauna</b>	BFF	<ul style="list-style-type: none"> <li>Condition of European sites</li> </ul>	<ul style="list-style-type: none"> <li>Require all local level land use plans to include ecosystem services and green/blue infrastructure provisions in their land use plans and as a minimum, to have regard to the required targets in relation to the conservation of European sites, other nature conservation sites, ecological networks, and protected species</li> <li>Implement and review, as relevant, County Galway Heritage and Biodiversity Plan 2017-2022</li> </ul>	<ul style="list-style-type: none"> <li>DHLGH report of the implementation of the measures contained in the Habitats Directive - as required by Article 17 of the Directive (every 6 years).</li> <li>DHLGH National Birds Directive Monitoring Report for the under Article 12 (every 3 years)</li> <li>Consultations with the NPWS</li> </ul>	<ul style="list-style-type: none"> <li>Where condition of European sites is found to be deteriorating this will be investigated with the Regional Assembly and the DHLGH to establish if the pressures are related to Plan actions / activities. A tailored response will be developed in consultation with these stakeholders in such a circumstance.</li> </ul>
		<ul style="list-style-type: none"> <li>Number of spatial plans that have included ecosystem services content, mapping and policy to protect ecosystem services when their relevant plans are either revised or drafted</li> </ul>	<ul style="list-style-type: none"> <li>Require all local level land use plans to include ecosystem services and green/blue infrastructure provisions in their land use plans and as a minimum, to have regard to the required targets in relation to the conservation of European sites, other nature conservation sites, ecological networks, and protected species</li> <li>Implement and review, as relevant, County Galway Heritage and Biodiversity Plan 2017-2022</li> </ul>	<ul style="list-style-type: none"> <li>Internal review of local land use plans</li> </ul>	<ul style="list-style-type: none"> <li>Review internal systems</li> </ul>
		<ul style="list-style-type: none"> <li>SEAs and AAs as relevant for new Council policies, plans, programmes etc.</li> </ul>	<ul style="list-style-type: none"> <li>Screen for and undertake SEA and AA as relevant for new Council policies, plans, programmes etc.</li> </ul>	<ul style="list-style-type: none"> <li>Internal monitoring of preparation of local land use plans</li> </ul>	<ul style="list-style-type: none"> <li>Review internal systems</li> </ul>
		<ul style="list-style-type: none"> <li>Status of water quality in the County's water bodies</li> </ul>	<ul style="list-style-type: none"> <li>Included under Water below</li> </ul>	<ul style="list-style-type: none"> <li>Included under Water below</li> </ul>	<ul style="list-style-type: none"> <li>Included under Water below</li> </ul>
		<ul style="list-style-type: none"> <li>Compliance of planning permissions with Plan measures providing for the protection of Biodiversity and flora and fauna – see County Development Plan Chapter 10 "Natural Heritage, Biodiversity and Green Infrastructure"</li> </ul>	<ul style="list-style-type: none"> <li>For planning permission to be only granted when applications demonstrate that they comply with all Plan measures providing for the protection of biodiversity and flora and fauna – see County Development Plan Chapter 10 "Natural Heritage, Biodiversity and Green Infrastructure"</li> </ul>	<ul style="list-style-type: none"> <li>Internal monitoring of likely significant environmental effects of grants of permission</li> </ul>	<ul style="list-style-type: none"> <li>Review internal systems</li> </ul>
<b>Population and Human Health</b>	PHH	<ul style="list-style-type: none"> <li>Implementation of Plan measures relating to the promotion of economic growth as provided for by County Development Plan Chapter 5 "Economic, Enterprise and Retail"</li> </ul>	<ul style="list-style-type: none"> <li>For review of progress on implementing Plan objectives to demonstrate successful implementation of measures relating to the promotion of economic growth as provided for by County Development Plan Chapter 5 "Economic, Enterprise and Retail"</li> <li>By 2020 all citizens will have access to speeds of 30Mbps, and that 50% of citizens will be subscribing to speeds of 100Mbps (Also relevant to Material Assets)</li> </ul>	<ul style="list-style-type: none"> <li>Internal review of progress on implementing Plan objectives</li> <li>Consultations with DECC</li> </ul>	<ul style="list-style-type: none"> <li>Review internal systems</li> <li>Consultations with DECC</li> </ul>

SEA Environmental Report Appendix III: Non-Technical Summary

Environmental Component	SEO Code	Indicators	Targets	Sources	Remedial Action
		<ul style="list-style-type: none"> <li>Number of spatial concentrations of health problems arising from environmental factors resulting from development permitted under the Plan</li> </ul>	<ul style="list-style-type: none"> <li>No spatial concentrations of health problems arising from environmental factors as a result of implementing the Plan</li> </ul>	<ul style="list-style-type: none"> <li>Consultations with the Health Service Executive and EPA</li> </ul>	<ul style="list-style-type: none"> <li>Consultations with the Health Service Executive and EPA</li> </ul>
		<ul style="list-style-type: none"> <li>Proportion of people reporting regular cycling / walking to school and work above 2016 CSO figures</li> </ul>	<ul style="list-style-type: none"> <li>Increase in the proportion of people reporting regular cycling / walking to school and work above 2016 CSO figures</li> </ul>	<ul style="list-style-type: none"> <li>CSO data</li> <li>Monitoring of Galway County Council's Climate Change Adaptation Strategy 2019-2024</li> </ul>	<ul style="list-style-type: none"> <li>Where proportion of population shows increase in private car use above CSO 2016 figures, the Council will coordinate with the Regional Assembly, the DHLGH, DECC and NTA to develop a tailored response.</li> </ul>
		<ul style="list-style-type: none"> <li>Number of spatial plans that include specific green infrastructure mapping</li> </ul>	<ul style="list-style-type: none"> <li>Require all local level land use plans to include specific green infrastructure mapping</li> </ul>	<ul style="list-style-type: none"> <li>Internal review of local land use plans</li> </ul>	<ul style="list-style-type: none"> <li>Review internal systems</li> </ul>
<b>Soil (and Land)</b>	S	<ul style="list-style-type: none"> <li>Proportion of population growth occurring on infill and brownfield lands compared to greenfield (also relevant to Material Assets)</li> </ul>	<ul style="list-style-type: none"> <li>Maintain built surface cover nationally to below the EU average of 4% as per the NPF</li> <li>In accordance with National Policy Objectives 3c of the National Planning Framework, a minimum of 30% of the housing growth targeted in any settlement is to be delivered within the existing built-up footprint of the settlement</li> <li>To map brownfield and infill land parcels across the County</li> </ul>	<ul style="list-style-type: none"> <li>EPA Geoportal</li> <li>Compilation of greenfield and brownfield development for the DHLGH</li> <li>AA/Screening for AA for each application</li> </ul>	<ul style="list-style-type: none"> <li>Where the proportion of growth on infill and brownfield sites is not keeping pace with the targets set in the NPF and the RSES, the Council will liaise with the Regional Assembly to establish reasons and coordinate actions to address constraints to doing so.</li> </ul>
		<ul style="list-style-type: none"> <li>Instances where contaminated material generated from brownfield and infill must be disposed of</li> </ul>	<ul style="list-style-type: none"> <li>Dispose of contaminated material in compliance with EPA guidance and waste management requirements</li> </ul>	<ul style="list-style-type: none"> <li>Internal review of grants of permission where contaminated material must be disposed of</li> </ul>	<ul style="list-style-type: none"> <li>Consultations with the EPA and Development Management</li> </ul>
		<ul style="list-style-type: none"> <li>Environmental assessments and AAs as relevant for applications for brownfield and infill development prior to planning permission</li> </ul>	<ul style="list-style-type: none"> <li>Screen for and undertake environmental assessments and AA as relevant for applications for brownfield and infill development prior to planning permission</li> </ul>	<ul style="list-style-type: none"> <li>Internal monitoring of grants of permission</li> </ul>	<ul style="list-style-type: none"> <li>Review internal systems</li> </ul>
<b>Water</b>	W	<ul style="list-style-type: none"> <li>Status of water bodies as reported by the EPA Water Monitoring Programme for the WFD</li> </ul>	<ul style="list-style-type: none"> <li>Not to cause deterioration in the status of any surface water or affect the ability of any surface water to achieve 'good status'</li> <li>Implementation of the objectives of the River Basin Management Plan</li> </ul>	<ul style="list-style-type: none"> <li>EPA Monitoring Programme for WFD compliance</li> </ul>	<ul style="list-style-type: none"> <li>Where water bodies are failing to meet at least good status this will be investigated with the DHLGH Water Section, the EPA Catchment Unit, the Regional Assembly and, as relevant, Irish Water to establish if the pressures are related to Plan actions / activities. A tailored response will be developed in consultation with these stakeholders in such a circumstance.</li> <li>Where planning applications are rejected due to insufficient capacity in the WWTP or failure of the WWTP to meet Emission Limit Values, the Council will consider whether it is necessary to coordinate a response with the Regional Assembly, EPA and Irish Water to achieve the necessary capacity.</li> </ul>

SEA Environmental Report Appendix III: Non-Technical Summary

Environmental Component	SEO Code	Indicators	Targets	Sources	Remedial Action
		<ul style="list-style-type: none"> <li>Number of incompatible developments permitted within flood risk areas</li> </ul>	<ul style="list-style-type: none"> <li>Minimise developments granted permission on lands which pose - or are likely to pose in the future - a significant flood risk</li> </ul>	<ul style="list-style-type: none"> <li>Internal monitoring of likely significant environmental effects of grants of permission</li> </ul>	<ul style="list-style-type: none"> <li>Where planning applications are being permitted on flood zones, the Council will ensure that such grants are in compliance with the Flood Risk Management Guidelines and include appropriate flood risk mitigation and management measures.</li> </ul>
<b>Material Assets</b>	MA	<ul style="list-style-type: none"> <li>Programmed delivery of Irish Water infrastructure for all key growth towns in line with Irish Water Investment Plan and prioritisation programme to ensure sustainable growth can be accommodated</li> <li>Number of new developments granted permission which can be adequately and appropriately served with waste water treatment over the lifetime of the Plan</li> </ul>	<ul style="list-style-type: none"> <li>All new developments granted permission to be connected to and adequately and appropriately served by waste water treatment over the lifetime of the Plan</li> <li>Where septic tanks are proposed, for planning permission to be only granted when applications demonstrate that the outfall from the septic tank will not – in combination with other septic tanks – contribute towards any surface or ground water body not meeting the objective of good status under the Water Framework Directive</li> <li>Facilitate, as appropriate, Irish Water in developing water and wastewater infrastructure</li> <li>See also targets relating to greenfield and brownfield development of land under Soil and broadband under Population and Human Health</li> </ul>	<ul style="list-style-type: none"> <li>Internal monitoring of likely significant environmental effects of grants of permission Consultations with the Irish Water</li> <li>DHLGH in conjunction with Local Authorities</li> </ul>	<ul style="list-style-type: none"> <li>Where planning applications are rejected due to insufficient capacity in the WWTP or failure of the WWTP to meet Emission Limit Values, the Council will consider whether it is necessary to coordinate a response with the Regional Assembly, EPA and Irish Water to achieve the necessary capacity.</li> </ul>
		<ul style="list-style-type: none"> <li>Proportion of people reporting regular cycling / walking to school and work above 2016 CSO figures</li> </ul>	<ul style="list-style-type: none"> <li>Increase in the proportion of people reporting regular cycling / walking to school and work above 2016 CSO figures</li> </ul>	<ul style="list-style-type: none"> <li>CSO data</li> <li>Monitoring of Galway County Council's Climate Change Adaptation Strategy 2019-2024</li> </ul>	<ul style="list-style-type: none"> <li>Where proportion of population shows increase in private car use above CSO 2016 figures, the Council will coordinate with the Regional Assembly, the DHLGH, DECC and NTA to develop a tailored response.</li> </ul>
<b>Air</b>	A	<ul style="list-style-type: none"> <li>Proportion of journeys made by private fossil fuel-based car compared to 2016 National Travel Survey levels of 74%</li> <li>NO<sub>x</sub>, SO<sub>x</sub>, PM10 and PM2.5 as part of Ambient Air Quality Monitoring</li> </ul>	<ul style="list-style-type: none"> <li>Decrease in proportion of journeys made by private fossil fuel-based car compared to 2016 National Travel Survey levels</li> <li>Improvement in Air Quality trends, particularly in relation to transport related emissions of NO<sub>x</sub> and particulate matter</li> </ul>	<ul style="list-style-type: none"> <li>CSO data</li> <li>Data from the National Travel Survey</li> <li>EPA Air Quality Monitoring</li> <li>Consultations with Department of Transport and Department of Environment, Climate and Communications</li> </ul>	<ul style="list-style-type: none"> <li>Where proportion of population shows increase in private car use above CSO 2016 figures, Council will coordinate with the Regional Assembly, DHLGH, DECC and NTA to develop a tailored response. See also entry under Population and human health above</li> </ul>
<b>Climatic Factors</b>	C	<ul style="list-style-type: none"> <li>Implementation of Plan measures relating to climate reduction targets</li> </ul>	<ul style="list-style-type: none"> <li>For review of progress on implementing Plan objectives to demonstrate successful implementation of measures relating to climate reduction targets</li> </ul>	<ul style="list-style-type: none"> <li>Internal monitoring of likely significant environmental effects of grants of permission</li> </ul>	<ul style="list-style-type: none"> <li>Review internal systems</li> </ul>
		<ul style="list-style-type: none"> <li>A competitive, low-carbon, climate-resilient and environmentally sustainable economy</li> </ul>	<ul style="list-style-type: none"> <li>Contribute towards transition to a competitive, low-carbon, climate-resilient and environmentally sustainable economy by 2050</li> </ul>	<ul style="list-style-type: none"> <li>Monitoring of Galway County Council's Climate Change Adaptation Strategy 2019-2024</li> <li>EPA Annual National Greenhouse Gas Emissions Inventory reporting</li> <li>Climate Action Regional Office</li> </ul>	<ul style="list-style-type: none"> <li>Where targets are not achieved, the Council will liaise with the Regional Assembly and the Eastern and Midlands Climate Action Regional Office to establish reasons and develop solutions.</li> </ul>
		<ul style="list-style-type: none"> <li>Share of renewable energy in transport</li> </ul>	<ul style="list-style-type: none"> <li>Contribute towards the target of the Renewable Energy Directive (2009/28/EC), for all Member States to reach a 10% share</li> </ul>		

SEA Environmental Report Appendix III: Non-Technical Summary

Environmental Component	SEO Code	Indicators	Targets	Sources	Remedial Action
			of renewable energy in transport by facilitating the development of electricity charging and transmission infrastructure, in compliance with the provisions of the Plan	<ul style="list-style-type: none"> <li>• Consultations with DECC</li> </ul>	
		<ul style="list-style-type: none"> <li>• Carbon dioxide (CO<sub>2</sub>) emissions across the electricity generation, built environment and transport sectors</li> </ul>	<ul style="list-style-type: none"> <li>• Contribute towards the target of aggregate reduction in carbon dioxide (CO<sub>2</sub>) emissions of at least 80% (compared to 1990 levels) by 2050 across the electricity generation, built environment and transport sectors</li> </ul>		
		<ul style="list-style-type: none"> <li>• Energy consumption, the uptake of renewable options and solid fuels for residential heating</li> </ul>	<ul style="list-style-type: none"> <li>• To promote reduced energy consumption and support the uptake of renewable options and a move away from solid fuels for residential heating</li> </ul>		
		<ul style="list-style-type: none"> <li>• Proportion of journeys made by private fossil fuel-based car compared to 2016 levels</li> </ul>	<ul style="list-style-type: none"> <li>• Decrease in the proportion of journeys made by residents of the County using private fossil fuel-based car compared to 2016 levels</li> </ul>	<ul style="list-style-type: none"> <li>• CSO data</li> <li>• Monitoring of Galway County Council's Climate Change Adaptation Strategy 2019-2024</li> </ul>	<ul style="list-style-type: none"> <li>• Where trends toward carbon reduction are not recorded, the Council will liaise with the Regional Assembly and the Eastern and Midlands Climate Action Regional Office to establish reasons and develop solutions.</li> </ul>
		<ul style="list-style-type: none"> <li>• Proportion of people reporting regular cycling / walking to school and work above 2016 CSO figures</li> </ul>	<ul style="list-style-type: none"> <li>• Increase in the proportion of people reporting regular cycling / walking to school and work above 2016 CSO figures</li> </ul>	<ul style="list-style-type: none"> <li>• CSO data</li> <li>• Monitoring of Galway County Council's Climate Change Adaptation Strategy 2019-2024</li> </ul>	<ul style="list-style-type: none"> <li>• Where proportion of population shows increase in private car use above CSO 2016 figures, the Council will coordinate with the Regional Assembly, the DHLGH, DECC and NTA to develop a tailored response.</li> </ul>
<b>Cultural Heritage</b>	CH	<ul style="list-style-type: none"> <li>• Percentage of entries to the Record of Monuments and Places, and the context these entries within the surrounding landscape where relevant, protected from adverse effects resulting from development which is granted permission under the Plan</li> </ul>	<ul style="list-style-type: none"> <li>• Protect entries to the Record of Monuments and Places, and the context of these entries within the surrounding landscape where relevant, from adverse effects resulting from development which is granted permission under the Plan</li> </ul>	<ul style="list-style-type: none"> <li>• Internal monitoring of likely significant environmental effects of grants of permission</li> </ul>	<ul style="list-style-type: none"> <li>• Where monitoring reveals visitor or development pressure is causing negative effects on designated archaeological or architectural heritage, the Council will work with Regional Assembly, Fáilte Ireland and the National Monuments Service and other stakeholders, as relevant, to address pressures through additional mitigation..</li> </ul>
		<ul style="list-style-type: none"> <li>• Percentage of entries to the Record of Protected Structures and Architectural Conservation Areas and their context protected from significant adverse effects arising from new development granted permission under the Plan</li> </ul>	<ul style="list-style-type: none"> <li>• Protect entries to the Record of Protected Structures and Architectural Conservation Areas and their context from significant adverse effects arising from new development granted permission under the Plan</li> </ul>	<ul style="list-style-type: none"> <li>• Consultation with DHLGH</li> </ul>	
<b>Landscape</b>	L	<ul style="list-style-type: none"> <li>• Number of developments permitted that result in avoidable adverse visual impacts on the landscape, especially with regard to landscape and amenity designations included in Land Use Plans, resulting from development which is granted permission under the Plan</li> </ul>	<ul style="list-style-type: none"> <li>• No developments permitted which result in avoidable adverse visual impacts on the landscape, especially with regard to landscape and amenity designations included in Land Use Plans, resulting from development which is granted permission under the Plan</li> </ul>	<ul style="list-style-type: none"> <li>• Internal monitoring of likely significant environmental effects of grants of permission</li> </ul>	<ul style="list-style-type: none"> <li>• Where monitoring reveals developments permitted which result in avoidable adverse visual impacts on the landscape, the Council will re-examine Plan provisions and the effectiveness of their implementation</li> </ul>