



Comhairle Chontae na Gaillimhe
Galway County Council

Draft **Loughrea Local Area Plan** 2024–2030

June 2024

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

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Draft Loughrea Local Area Plan 2024-2030

Chief Executive's Report on Submissions Received on the Material
Alterations to the Draft Loughrea Local Area Plan 2024-2030

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 Loughrea Local Area Plan 2024-2030 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 Monday, 15th April to Monday, 13th May 2024, (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 MA51) did not require a Stage 2 AA and the following Material Alterations require SEA and consideration in a SEA Environmental Report:

- MA35
- MA37

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 Loughrea Municipal District Members in June 2024.

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 Loughrea Local Area Plan 2024-2030 was placed on public display for 6 weeks, from Monday 24th November 2023 until Monday 15th January 2024 (inclusive).

The Chief Executive's Report was circulated to the Elected Members on 26th February 2024. The Elected Members of the Loughrea Municipal District held a Special meeting on the 26th March 2024 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 Loughrea Local Area Plan 2024-2030 and the associated environmental reports, were available for inspection during normal opening hours from Monday 15th April 2024 until Monday 13th May 2024 (both dates inclusive).

During the public consultation period, submissions were received in relation to the proposed Material Alterations to the Draft Loughrea LAP. In this regard, a total of 38 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
- TDs and Elected Members of Galway County Council
- 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 Loughrea Local Area Plan 2024-2030:

- 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 Loughrea Local Area Plan 2024-2030.

1.4.2 List of Submissions Received

This includes a list of all submissions received on the Material Alterations to the Draft Loughrea Local Area Plan 2024 - 2030:

Submissions Received - 38

	Submission No.	Name	Date Received
1	GLW-C97-1	Tipperary County Council	16.04.24
2	GLW-C97-2	MPD Property Developments Ltd.	23.04.24
3	GLW-C97-3	Brian Henehan	23.04.24
4	GLW-C97-4	Thomas Claffey	25.04.24
5	GLW-C97-5	It's Time for a Public Swimming Pool in Loughrea	26.04.24
6	GLW-C97-6	Sean Canney TD	26.04.24
7	GLW-C97-7	Environmental Protection Agency	29.04.24
8	GLW-C79-8	Cllr. Jimmy McClearn	30.04.24
9	GLW-C97-9	Cllr. Shane Curley	01.05.24
10	GLW-C97-10	Cllr. Declan Kelly	02.05.24
11	GLW-C97-11	Ailish O'Reilly	02.05.24
12	GLW-C97-12	Ciaran Cannon TD	02.05.24
13	GLW-C97-13	Cllr. Michael Moegie Maher	02.05.24
14	GLW-C97-14	Roberto Property Company Ltd.	03.05.24
15	GLW-C97-15	Transport Infrastructure Ireland (TII)	03.05.24
16	GLW-C97-16	Maria Walsh MEP	06.05.24
17	GLW-C97-17	Chris MacManus MEP	07.05.24
18	GLW-C97-18	Cllr. Ivan Canning	07.05.24
19	GLW-C97-19	Louis O'Hara	07.05.24
20	GLW-C97-20	Fergal Landy	07.05.24

21	GLW-C97-21	Emma Sheeran	09.05.24
22	GLW-C97-22	Luke 'Ming' Flanagan MEP	09.05.24
23	GLW-C97-23	Ollie Turner	10.05.24
24	GLW-C97-24	Ollie Turner	10.05.24
25	GLW-C97-25	Michelle Gildernew MP	10.05.24
26	GLW-C97-26	Mark Larkin	11.05.24
27	GLW-C97-27	Office of Public Works (OPW)	13.05.24
28	GLW-C97-28	Uisce Eireann	13.05.24
29	GLW-C97-29	Dept. of Education	13.05.24
30	GLW-C97-30	National Transport Authority	13.05.24
31	GLW-C97-31	Brian Curran	13.05.24
32	GLW-C97-32	Colm O'Donnell	13.05.24
33	GLW-C97-33	Brian Curran	13.05.24
34	GLW-C97-34	Brian Curran	13.05.24
35	GLW-C97-35	Office of the Planning Regulator (OPR)	13.05.24
36	GLW-C97-36	Enviroplan Ltd on behalf Leadlane Ltd.	13.05.24
37	GLW-C97-37	Enviroplan Ltd on behalf Leadlane Ltd.	13.05.24
38	GLW-C97-38	Anne Rabbitte TD	13.05.24

2. Submissions

Office of the Planning Regulator

GLW-C97-35

The Office of the Planning Regulator (OPR) acknowledge the considerable and evident work in preparing the proposed Material Alterations to the Draft Loughrea LAP 2024 – 2030. 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 Material Alteration (MA) 1 concerning Flood Risk Assessment which addresses part of Observation 3 of the OPR submission on the Draft LAP. The proposed MA clarifies that climate change considerations have been integrated into the flood risk management provisions. The OPR welcomed the approach by the Planning Authority in avoiding zoning land for residential development in flood risk areas consistent with National Policy to avoid placing people and property at unnecessary risk from future flood events. The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines) also requires that the same approach be followed in terms of all land use zonings.

The OPR also welcomes proposed MA2 in relation to Sustainable urban Drainage Systems (SuDS) and Nature Based Solutions which address Observations 4 of the OPR submission on the Draft LAP. This additional text provides clarity as to what is required in relation to surface water infrastructure/management when proposing development on the opportunity sites and demonstrates the Planning Authority's commitment to a more systemic and plan-led approach to water sensitive urban design that combines nature-based solutions with spatial planning.

With regard to the two recommendations, the OPR accepts the justification provided in response to Recommendation 1 of the OPR submission on the Draft LAP which related to isolated individual land parcels.

The OPR also welcomes the inclusion of the ATOS assessment as part of the Local Transport Plan (LTP) in response to Recommendation 2 of the OPR's submission to the Draft LAP. As part of Recommendation 2, the OPR raised concerns concerning policies to protect National Roads. The Chief Executive's Report addresses this matter, however, the zoning of land along a National Road outside of the Settlement boundary as part of the MA35 and MA37 appears inconsistent with the response of the Chief Executive's Report to the concerns of the OPR on this matter.

The OPR was generally satisfied with the approach to Residential Development in the Draft LAP, in particular the general consistency with the Core Strategy of the Development Plan. The OPR has no objection to the proposed Material Alterations that amend the zonings for Residential Development. The majority of the lands that are proposed as part of the proposed Material Alterations are located inside of the CSO 2016 settlement boundary and are adjacent to lands already in use for Residential Development. The OPR considers that the Draft LAP and the Material Alterations are generally consistent with NPO 3c and policy objective CS 2 of the Development Plan.

The OPR has concerns with proposed Material Alterations for Community Facilities zonings, and these being provided in a location outside the settlement boundary as well as being less sequentially preferable to other sites. These primarily relate to MA35 and MA37. It is considered that these proposed Material Alterations undermine the very positive policies, objectives, and strategies in the Draft LAP, promoting compact and proportionate growth, sustainable mobility and the transition to a low carbon and climate resilient society. The MA35 and MA37 are considered further below.

In relation to Employment lands, the OPR generally welcomes the approach to the Economic and Employment section of the Draft LAP. It is noted that there are proposed Material Alterations relating to the zoning of additional lands for Employment purposes. The OPR considers, having regard to the scale of employment lands proposed for Material Alterations, that they are reviewed.

Observations were included in the OPR's submission to the Draft LAP in relation to the delivery of regeneration projects, vacancy, flood zone mapping, SuDS as well as implementation and monitoring. The OPR notes that the observations in relation to flood zone mapping and SuDS were addressed, however, the observations relating to the delivery of regeneration projects, vacancy as well as implementation and monitoring have not been addressed as part of the proposed material alterations and weaken the basis for implementation and delivery over the plan period.

It is within this context the submission below sets out **One Recommendation and One Observation under Two Themes:**

1. Land Use Zoning for Community Facilities Uses

The OPR generally welcomes the provision of lands zoned Community Facilities, as well as the general approach that has been taken to education, social and community amenities as part of the Draft LAP. The OPR welcomes the inclusion of MA9 which provides an additional site that can provide for the delivery of additional school facilities. Also, the combination of MA39 and MA40 is welcomed as the associated site can provide accommodation for the elderly as well as providing a Swimming Pool facility for the Town.

The OPR, however, has concerns in relation to the proposed Material Alterations MA35, MA36 and MA37 which provide for the zoning of land for Community Facilities to the north of the town as well as an objective to encourage the provision of sports facilities on the site zoned MA35. The location of these lands is outside the Settlement Boundary and beyond the bypass for the Town, it is considered that the location of these sites is not consistent with compact growth or the sequential approach to zoning. As such, MA35, MA36 and MA37 are contrary to the intentions of NSO 1 of the NPF which seeks to provide compact and connected settlements.

The OPR has reviewed the published Strategic Environmental Assessment (SEA) and Appropriate Assessment documents that accompany the proposed Material Alteration. The SEA document highlights a number of similar issues with MA35 and MA37, including the following;

- They are contrary to sustainable compact growth, sustainable mobility and a transition to a low carbon and climate resilient society;
- They are contrary to meeting carbon emissions reduction targets; and

- They would negatively impact on the economic viability of providing for public assets and infrastructure.

The SEA, as well as the Strategic Flood Risk Assessment, also noted that a portion of the MA35 site overlaps with Flood Zone A and B and would fail the Justification Test outlined in the Flood Guidelines.

As such the OPR considers the subject land unsuitable for the proposed land use zoning and as such, recommends that MA35, MA36 and MA37 should not be adopted.

The OPR also notes that the lands subject to these proposed Material Alterations have no active travel connections, with no connections planned either as part of the LAP or the LTP. The nearest proposed Active Travel route is WC24, which does not propose to cross the N65. The proposed Material Alterations, including the amended LTP, provide no details for how this land will be accessed and, as such, it is unclear how the lands can be considered appropriate for zoning. This concern was also raised by Transport Infrastructure Ireland as part of its submission on the Material Alteration.

The zoning of the lands associated with MA35 and MA37 is inconsistent with LSST 54 of the Draft LAP, as well as policy objectives PM4, PM6, GCTPS4, WC1 and WC4 of the Development Plan which seek to promote a modal shift to sustainable transport options as well as ensuring that new developments are connected to the active travel network. These Development Plan policy objectives are included in response to Section 10(2)(n) of the Act and the proposed zonings of these lands are contrary to the approach outlined in the Development Plan. The approach is also inconsistent with RPO 6.30, which outlines that planning at a local level should encourage services being within walking and cycling distance of local services. Given the location of the proposed lands on the opposite side of a national route from the town with no existing or proposed active travel connections, the proposed lands are not consistent with the approach outlined in these policies and objectives.

In relation to climate change, it is noted that with MA35 and MA37 proposed to be located outside the CSO settlement boundary and adjacent to a National Route, it is likely that if the lands were developed it would lead to an increase in car-based trips. Such an approach is contrary to the Climate Action Plan as empowered by the Climate Action and Low Carbon Development Act 2015, as amended, which seeks to reduce car-based trips and specifically reduce vehicle kilometres by 20 percent. The Climate Action Plan also outlines the role of the local authority. In this regard, it is noted that local authorities ‘...are particularly critical to implementation and delivery in transport, owing especially to their role in the spatial and land use planning system...’. The OPR considers that the subject Material Alterations are not consistent with the approach outlined in the Climate Action Plan and are contrary to NPO 54 which seeks to integrate climate action into the planning system.

The lands associated with both MA35 and MA37 are adjacent to the N65 as well as the Monearmore Roundabout, with this location likely to increase the use of private cars if the lands are developed. In this respect, section 2.4 and section 2.7 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) states that development adjacent to national roads or their junctions should be avoided. Furthermore, these sections of the guidelines also outline that Planning Authorities should exercise particular care when providing zonings beside junctions along National Routes and

that potentially compromising the capacity and efficiency of the National Road/associated junctions should be avoided.

As noted above there is not sufficient evidence provided with this proposed Material Alteration to consider that the proposed zoning is consistent with these guidelines. It is also considered that the location of this site is inconsistent with RPO 6.5 and policy objective NR.1 of the Development Plan, which seeks to protect the capacity and safety of National Roads. Further to this, the proposed sites could also impact on the safety and capacity of the R350, therefore, the development of this site is also inconsistent with NNR2 of the Development Plan.

The OPR has reviewed the Chief Executive's Report which recommended that the lands associated with MA35 and MA37 should not be zoned. The Chief Executive's Report accepted the need for a proposed sports facility, however, the report recommended that an alternative site be zoned to achieve this purpose. The OPR concurs with the findings of the Chief Executive's Report that the lands proposed to be zoned as part of MA35 and MA37 are inappropriate and that an alternative site, outlined in the Chief Executive's Report, is more appropriate. It is considered that a comprehensive review would be required before identifying a site for a sports facility. As such, the proposed material alterations and the submission associated with these lands do not provide sufficient evidence to justify these lands.

MA Recommendation 1 – Lands Zoned for Community Facilities Uses

Having regard to the proposed zoning of community facilities land and the need for sustainable growth of compact development which priorities travel by walking and cycling, to protect the capacity and safety of national roads, and to avoid development in areas at risk of flooding, and in particular to:

- policy objectives NR.1 PM4, PM6, GCTPS4, WC1 & WC4 of the Galway County Development Plan 2022-2028;
- RPO 6.5 and RPO 6.30;
- the Strategic Environmental Assessment Report on the material alterations and the draft Loughrea Local Area Plan 2024-2030 (the LAP);
- policy objective LSST 54 of the draft LAP;
- section 2.4 and 2.7 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012);
- the Planning System and Flood Risk Management Guidelines (2009);
- the Climate Action Plan 2024 as empowered by the Climate Action and Low Carbon Development Act 2015, as amended,

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

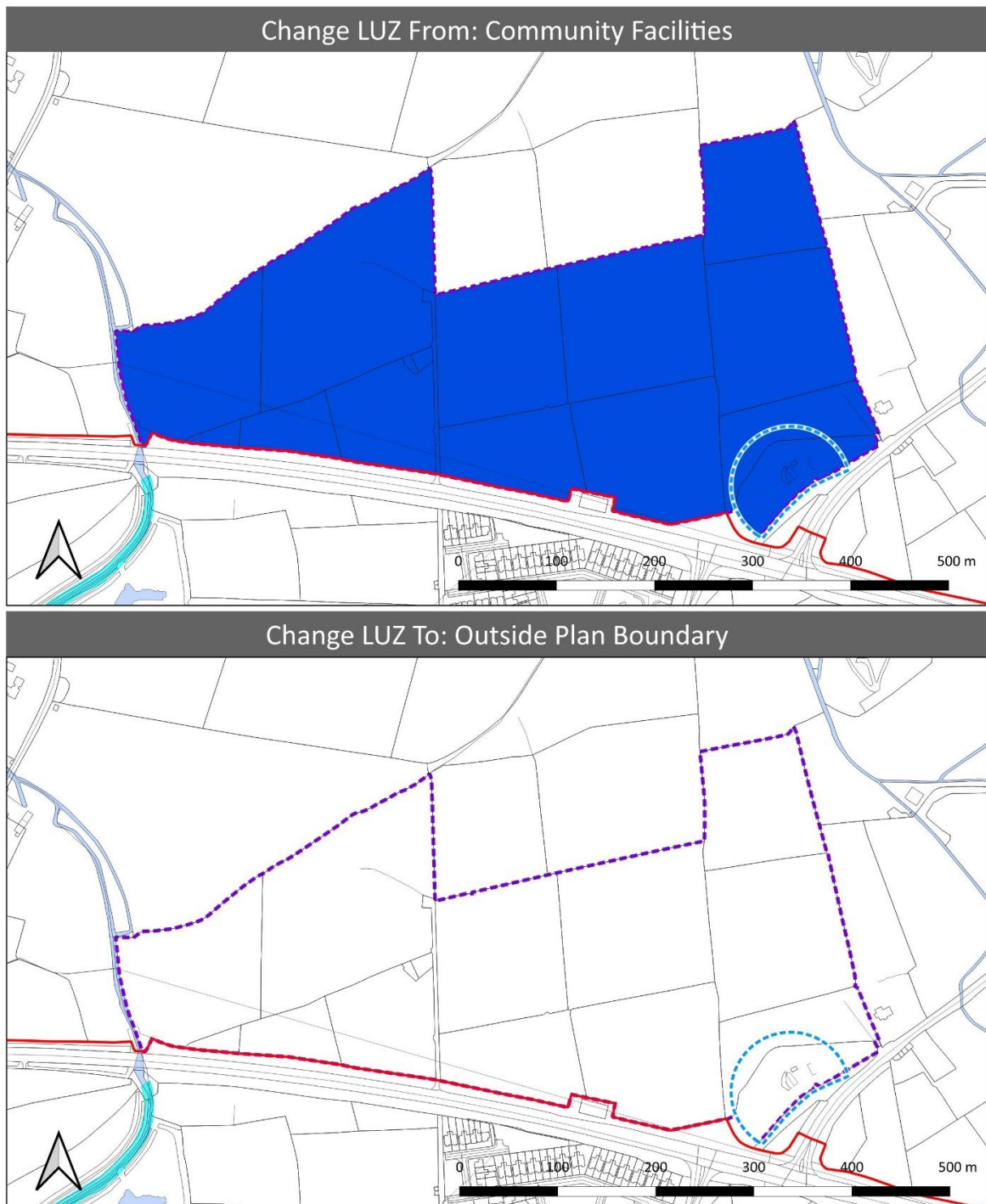
- (i) MA35 – Rezone lands from Outside the Settlement Boundary to Community Facilities;
- (ii) MA36 – New Policy Objective LSST 86; and
- (iii) MA37 - Rezone lands from Outside the Settlement Boundary to Community Facilities.

Chief Executive's Response

The content of the submission is noted. The Planning Authority notes the view of the OPR with regards to MA35, MA36 and MA37. The lands subject to these Material Alterations should revert as per the Draft Loughrea LAP 2024 – 2030 and omit Policy Objective LSST 68.

Chief Executive's Recommendation

- (i) **MA35:** Revert to the provisions of the Draft Loughrea LAP where these lands were not zoned.



- (ii) **MA36:** Omit Policy Objective LSST 68 Reserve the lands for Sport, Recreation and Community Development.

~~LSST 68 Reserve the lands for Sport, Recreation and Community Development.~~

~~It is a Policy Objective of Galway County Council to reserve the lands for Sport, Community and Recreational Opportunities for the Town of Loughrea and its Hinterlands.~~

- (iii) **MA37:** Revert to the provisions of the Draft Loughrea LAP where this land was not zoned.



2. Land Use Zoning for Employment Uses

The OPR, in its submission to the Draft LAP, broadly welcomed the policies and objectives with regard to economic development and employment. Furthermore, the OPR acknowledge the importance of Loughrea as a Self-Sustaining Town.

The OPR considers that there were sufficient lands provided as part of the Draft LAP with a landbank of Industrial zoned lands to the west of the town, a landbank of Business and Technology zoned lands to the east of the town and a landbank of Business and Enterprise zoned land adjacent to the Town Centre

The OPR has concerns in relation to lands to the east of the town that are proposed as part of the Material Alterations to be zoned as Business and Technology (MA34). MA34 proposes 15.01 hectares of land for Business and Technology purposes, and the OPR notes that there is no evidence base provided to justify the scale of this zoning. Having reviewed the pattern of development in the settlement, it is noted that there are approximately two hectares of land available for Business and Technology purposes in the existing IDA Business and Technology Park which is on the opposite side of the Dublin Road to the location of MA34.

The OPR accepts the justification for the zoning of additional Business and Technology lands, however, it is considered that given the lack of evidence-basis of the zoning, the scale of the zoning be reviewed to evaluate the extent of the land zoned as part of MA34.

Furthermore, section 6.2.5 of the Development Plans, Guidelines for Planning Authorities (2022) (the Development Plans Guidelines) advises that the ‘... proposed employment zoning must have a credible rationale, particularly with regard to location and type of employment’. Section 1.4 of Appendix A of the Development Plans Guidelines also sets out an approach to enterprise and employment zonings which has not been considered as part of this assessment. The OPR does not, therefore, consider that the Material Alterations document provides sufficient evidence to justify the number of lands zoned as part of MA34.

The OPR conclusion in relation to MA34 is consistent with the approach of the Chief Executive’s Report which recommends that a portion of the lands be zoned for Business and Technology purposes. The OPR requests that the Planning Authority review the scale of the proposed zoning for Business and Technology purposes associated with MA34.

MA Observation 1 – Lands Zoned for Employment Uses

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 planning authority is requested to:

- (i) provide an evidence-based rationale for the overall quantity of land zoned as part of MA34; and
- (ii) reevaluate any lands which cannot be justified under (i) above.

Chief Executive's Response

The content of the submission is noted. The Planning Authority notes the view of the OPR with regards to MA34.

- (i) Loughrea is identified as a Self-Sustaining Town within the settlement strategy of the GCDP 2022 – 2028. Loughrea settlement is categorised as a “Self-Sustaining Town with high levels of population growth and a limited employment base which are reliant on other areas for employment and/or services and which require targeted “catch-up” investment to become more sustaining”. To achieve the key objective of the GCDP 2022–2028, which is to promote Loughrea as a business destination, the economic status of the town must be encouraged and safeguarded. The OPR submission noted there are approx. two hectares of land available within the existing IDA Business and Technology Park. MA34 is strategically located within the Settlement Boundary and adjacent to the IDA Business and Technology Park with excellent transport links which include access to the N65 Loughrea Bypass and the M6 Dublin to Galway Motorway. In addition, the LTP which accompanies the LAP identifies several measures that will improve additional accessibility and pedestrian connectivity to the town. The lands can be easily accessed and serviced with water and wastewater infrastructure. Through the planning process, all new major employment developments in Loughrea will be required to provide active travel infrastructure which will complement the wider active travel network. It is considered that the spatial location of these lands identified for employment uses are appropriate and reflect Loughrea's position within the settlement hierarchy of the county.
- (ii) Noted. See response to (i) above.

Chief Executive's Recommendation

No Change.

Prescribed Authorities			
Submission No.	Submission Name	Summary of Issues Raised in Submission	Chief Executive's Response
GLW-C97-28	Uisce Éireann	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-C79-398). 1. <u>Wastewater Infrastructure</u> <i>1.1 Wastewater Treatment Plants (WWTPs)</i> Loughrea WWTP is currently not in compliance with Waste Water Discharge License emission limit values but is capable of achieving at least Urban Wastewater Treatment Directive standards. Potential availability of capacity in this case would be dependent on any additional load not resulting in a significant breach of the combined approach as set out in Regulation 43 of the Waste Water Discharge (Authorisation) Regulations 2000, which is the responsibility of Galway County Council to determine. The current (2022) wastewater treatment capacity register indicates there is potential capacity available to cater for the projected population allocation. Applications will be assessed on an individual basis considering their specific load requirements. Increased WWTP capacity may be required in the medium term, or to cater for significant non-domestic developments. The 2023 wastewater treatment capacity register is	Chief Executive's Response Submission noted. Noted.

		currently being prepared and will provide an updated view on available spare capacity. <i>1.2 Wastewater Network</i> The capacity of the wastewater network west and south of Station Road is constrained due to issues associated with a stormwater overflow at Station Road in Loughrea. A hydraulic study is underway to investigate the issues and identify works required. Upgrades, including stormwater removal, may be required to cater for significant developments in this catchment. The removal of stormwater from the combined sewer network to free up capacity for new development is strongly encouraged. Localised network reinforcement may also be required to facilitate development, particularly in areas currently serviced by small diameter sewers or watermain. <u>2. Water Supply Infrastructure</u> <i>2.1 Water Supply and Networks</i> Following the interconnection of Loughrea to the Tuam RWSS in recent years, Loughrea town is now supplied by Tuam RWSS which is part of Corrib Water Resource Zone. Knockanima WTP is also in operation supplying parts of the wider Loughrea area. Capacity is available to cater for population targets although Level of Service Improvements e.g. leakage reduction, network upgrades, may be required as demand increases. A hydraulic analysis of the trunk network in the Tuam RWSS is	Noted. Noted.
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		nearing completion and results are being assessed to identify constraints and inform future investment. The replacement of cast iron mains in Loughrea has recently commenced and will improve water quality and the Level of Service provided. Uisce Éireann and Galway County Council are continually progressing leakage reduction activities, mains rehabilitation activities and capital maintenance activities. Uisce Éireann and Galway County Council will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required. 3. <u>MAAs Amending Land Use Zonings</u> It is stated that Available network information indicates network extensions may be required to service some zoned sites. It is stated that depending on the extent of development realised, localised network upgrades may also be required, particularly in areas served by 150mm diameter sewers or watermains with a diameter of 80mm or less. It is stated third party on the extent of development realised, localised network upgrades may also be required, particularly in areas served by 150mm diameter sewers or watermains with a diameter of 80mm or less. It is stated that some sites would require significant extensions and/or upgrades to service, ref. additional site-specific comments below. In general, residential phase 2	Noted. Noted. Noted.
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		lands require a greater level of network reinforcements to service. Where network reinforcements such as upgrades or extensions are required, these shall be developer driven unless there are committed Uisce Éireann projects in place to progress such works. Where Uisce Éireann assets are within a proposed development site, the site layout must take account of these, and the assets must be protected or diverted as necessary. If there is a possibility that Uisce Éireann assets will need to be altered or diverted as a result of a proposed development, a diversion agreement may be required. Further information on this process is available at: https://www.water.ie/connections/developer-services/diversions/. Development in the vicinity of Uisce Éireann assets must be in accordance with Uisce Éireann standard details and codes of practise. Several of the Material Amendments seek to extend the settlement boundary, no justification for the scale of the proposed Business and Technology site (MA34) or Community Facilities (MA35) is provided. <i>3.1 Material Alteration Site-specific comments</i> MA12, MA15, MA16, MA17, MA18, MA19, MA20, MA21, MA22, MA25, MA26, MA27, MA30, MA31, MA38 and MA39	Noted. Noted. Noted.
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		Sites may fall within the constrained Station Road Storm Water Overflow (SWO) catchment. Applications will be assessed on an individual basis depending on their specific load requirements. Network reinforcements may be required to cater for significant developments. Refer also to section 1.2 above. MA9, MA21 and MA22 Depending on the topography of these sites, they may be served by the catchments to the east or south (Station Road catchment). Downstream network upgrades may be required if served from the catchment to the east. MA14 Likely connection to the public water and sewer network in Caheronaun Park Road to the west, extensions c.70m required. Potential may exist to connect via adjacent land to the west or estate to the south subject to third party permissions and capacity assessment. MA17, MA18 and MA19 There are no water supply or wastewater connections available to these sites without crossing third party land. There is a 150mm sewer immediately to the north of the site serving the school, but third-party permissions may be required. Once on the road a connection would be approximately 90m north for water supply and 160m to foul sewer.	Noted. Noted. Noted. Noted. MA17, MA18 and MA19 relate to small parcel of lands which are adjacent to Residential Phase 1 lands. This is acknowledged by the Planning Authority and is considered acceptable.
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		MA20 and MA38 The nearest foul sewers to this site are approximately 70m away in Baunogue estate. Available GIS of the water network is limited, local knowledge may provide greater clarity, connection may be possible via Baunogue estate or 170m extension to the west. Third party permissions may be required.	Noted.
		MA24 There is foul sewerage bordering the site and appropriate separation distances must be observed in the layout of the site. Available GIS of the water network is limited and indicates the nearest network is approx. 300m away; local knowledge may provide greater clarity.	Noted.
		MA25 (considered with R1d) Depending on topography sewer connection would be to the north with localized upgrades, or south to the Station Road catchment with an extension. Water network available on R350. Potential may exist to connect to the private network in Hazelwood subject to third party permissions.	Noted.
		MA26 Available GIS indicates the site is not serviced with the nearest water and wastewater networks are approximately 280m and 250m away at the roundabout, along the public road.	Noted.

		MA27, MA28 and MA29 Public water network is available at junction of Bohercom and Rockvale roads. GIS records show that there are private water supply pipes in the road adjacent to the sites. MA30 Watermain passing through the site will be decommissioned as part of the ongoing mains upgrade works in Loughrea. GIS indicates extension of approx. 70m required to the nearest live watermain. MA31 Sewer and watermain passing through site to be protected/ diverted in accordance with Uisce Éireann codes and standards. MA33 There is a foul sewer pipe that is routed through this site. Suitable separation distances would have to be achieved or the pipe diverted in order to facilitate development. MA34 This site is beyond the settlement boundary, depending on the scale of the development localised upgrades to water supply infrastructure and wastewater network may be required.	Noted. Noted. Noted. Noted. Noted.
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		M35 Connection to the water network would require crossing third party land to the north-west or a crossing under the ring road and may require upgrades. There is a trunk sewer that is routed through this site and adequate separation distances must be observed in the layout of the site or the pipe diverted. M37 There is a 100mm watermain that services this site, depending on the scale of the development upgrades may be required. Connection to foul sewer would require access across third party land or a crossing under the ring road. MA39 This site has an associated policy that allows for a swimming pool on this site. Modelling would be required once the details of any proposal was known to ensure that it could be serviced. It is likely that network upgrades would be required. The nearest trunk water main is approximately 500m east along Athenry Road.	Noted. In relations to MA35 see Chief Executives Response to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission. Noted. In relations to MA37 see Chief Executives Response to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission. Noted. Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission.</i>
GLW-C97-29	Department of Education	The submission has considered the Material Alterations and notes that there are no amendments to change projected growth figures in the Draft LAP. The Department reconfirm the projected school requirements outlined in its submission on the Draft LAP (GLW-C79-825). The Department welcomes MA9 to rezone lands from Residential Phase 2 to Community Facilities at the rear of the	Chief Executive's Response Submission Noted. Noted.

		Gaelscoil Riabhach to facilitate the potential future expansion of education facilities in Loughrea. The Department welcome MA11 to rezone lands from Residential Phase 1 to Community Facilities. The Department acknowledges the crucial importance of the ongoing work of the Council in ensuring sufficient and appropriate land is zoned for educational needs.	Noted. Noted. Chief Executive's Recommendation No Change.
GLW-C79-27	Office of Public Works (OPW)	The OPW as lead agency for Flood Risk Management in Ireland welcomes the opportunity to comment on the proposed Material Alterations of the Draft Loughrea LAP. A number of specific comments are made as follows and it outlined that opportunities exist for the Draft Plan before it is finalised. Considerations of Climate Change Impacts The OPW comments at the Draft Plan stage noted that while discussion on climate change focused on its consideration at Development Management Stage. The OPW notes Planning Authorities need to consider such impacts in the preparation of plans and suggest that Galway County Council clarify how climate change had been considered in the plan. The Chief Executive response to this observation referenced text in section 3.4 of the SFRA regarding requirements for Flood Risk Assessments, and policy objective FL 15 "Flood Risk Management" of the existing GCDP 2022 – 2028. In	Chief Executive's Response Submission Noted. Noted. The flood risk management provisions of the Plan explicitly integrate climate change considerations and have been informed by future scenario datasets (mapped in the accompanying SFRA). This includes Policy Objectives LSST 62 Climate Change and Local Renewable Energy Sources, LSST 68 Flood Risk Management and Assessment, LSST 73 Flood Risk Assessment and Climate Change and LSST 77 Flood Risk Management.

		addition, MA1 has added text referencing Policy Objectives LSST 62, LSST 68, LSST 73 and LSST 77. The text in Section 3.4, Policy Objective FL15 and the Policy Objectives referenced in the text added to MA1, referring to the consideration of climate change impacts at the development management stage. The submission adds Planning Authorities can consider the impacts of climate change at the forward planning stage by avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences, specifying minimum floor levels, and setting specific development management objectives. MA3 The initial submission of the Draft Plan (GLW-C79-294) noted the Justification Test being provided for previously developed Community Facilities at the Tennis Club and St. Brigit's College. The SFRA recommendation for this zoning is referenced in footnote no.6 from the Draft Plan's Lands Use Matrix (Table 1.6.1 of the Plan) and while the recommended text for Footnote No.6 as set out in section 4.2 of the SFRA made reference to this zoning, specifically restricted development inappropriate to the level of flood risk, this text had not been included in Footnote No.6 of the Land Use Matrix. MA3 amends the text to state that proposals for development on Community Facilities zoning must comply	Noted. MA3 and General Notes on Land Use Zoning Matrix will be updated to reflect this.
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	with The Planning System & Flood Risk Guidelines (2009) (or updated). The submission sets out that it would be beneficial if this footnote included the full text as recommended in section 4.2 of the SFRA as: “Uses for lands zoned "CF Community Facilities" along Lough Rea and at St. Bridgit's College shall be limited in areas at elevated risk of flooding, as per the Flood Risk Management Guidelines, as follows; • In Flood Zone A, uses shall be limited to water compatible uses; • In Flood Zone B, uses shall be limited to less-vulnerable and water compatible uses (as per the Flood Risk Management Guidelines); These limitations shall take primacy over any related provision relating to the land use zoning matrix.” MA35 The Submission notes the rezoning of lands from "Outside the Settlement Boundary" to "Community Facilities" and outlines there is a small overlap of Flood Zones A and B at the western end of these lands, which has not been reflected in the updated “Map 3, Flood Risk Management” provided at MA stage. The submission notes these lands have not satisfied the conditions of the Plan Making Justification Test included in Table 6, Section 4.5 of the SFRA. The SFRA recommendation for this zoning references “footnote no. 6 from the Draft Plan’s Land Use Matrix”. The submission indicates it would be beneficial if the full	Noted. In relations to MA35 see Chief Executives Response to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission. Chief Executive’s Recommendation Update the General Notes on Land Use Zoning Matrix as follows; 6. Proposals for development within the "Open Space/Recreation & Amenity and Community Facilities zoning must comply with The Planning System & Flood Risk Guidelines (2009) (or updated). Uses for lands zoned "CF Community Facilities" along Lough Rea and
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		recommended text for this footnote was included, making specific reference to these lands.	at St. Bridgit's College shall be limited in areas at elevated risk of flooding, as per the Flood Risk Management Guidelines, as follows; • In Flood Zone A, uses shall be limited to water compatible uses; • In Flood Zone B, uses shall be limited to less-vulnerable and water compatible uses (as per the Flood Risk Management Guidelines); These limitations shall take primacy over any related provision relating to the land use zoning matrix.” <i>See Chief Executives Recommendation to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission.</i>
GLW-C79-15	Transport Infrastructure Ireland (TII)	The Authority acknowledge and welcomes the proposed Material Alterations arising from the consideration of the Authority's initial submission (GLW-79-9) on the Draft Plan and LTP. About other proposed MAs on display, the TII outline the following observation to be considered; MA35 TII notes MA35 proposes the zoning of an extensive area of unzoned land, north of the town and separated from the Town Centre and Residential Areas by the N65 National Road. The lands can be accessed via the Local Road L4196 which accesses Loughrea via a staggered at-grade junction with the N65, National Road, at a location where TII's records indicate 100kph speed limits applies.	Chief Executive's Response Submission Noted. Noted. In relations to MA35 see Chief Executives Response to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission.

		TII states the proposed MA to the LAP and LTP has addressed the accessibility of the subject land for Active Travel, which was noted in the Chief Executives Report in the response provided to the proposals to zone the subject lands. MA35 does not appear to consider the implication of introducing vulnerable road users to a junction on the N65, National Road, requiring a crossing of the National Road where a 100 kph speed limit applies to access the lands. The submission notes the Council will be aware that Section 2.7 of the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) requires that planning authorities must exercise particular care in their assessment of LAP proposals relating to the development objectives and/or zoning of locations at or close to national road junctions. TII are not aware of any evidence base established to support the extent or location of the proposed zoning of the lands concerned. Notwithstanding, the DoECLG Guidelines requirement for the preparation of an appropriate evidence-based plan-led approach makes reference to accommodating appropriate strategic land uses, for example, nationally or regionally important employment clusters or intermodal transfer facilities that the proposed ‘Community Facilities’ zoning does not appear to reflect. The TII concur with the Recommendation of the Chief Executive that the subject lands being located to the north	
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	of the N65 would compromise the strategic function and traffic safety on this high-speed National Road. In addition, the Chief Executives Recommendation identifies a suitable alternative location for 'Community Facilities' zoning at Gorteenapheebera, Loughrea, which has the benefit of being served by the non-national road network, proximate to the town and residential areas and with the potential to be served by active travel (WC8 of the LTP) and public transport links (Figure 25 of the LTP). The TII has determined the absence of any evidence base to support the proposed zoning designation and, as such, supports the Recommendation outlined in the Chief Executive Report that the subject lands are not included in the LAP boundary and are not zoned 'Community Facilities'. TII notes the Chief Executive Recommendation that alternative lands are available for such purpose at Gorteenapheebera, Loughrea. MA37 Similar to above, TII notes MA37 proposes the zoning of previously unzoned land outside the Plan Boundary to 'Community Facilities'. The subject lands are to the north of the town located at the N65 Monearmore Roundabout Junction. The submission indicates it does not appear that the proposed MA to the LAP or LTP has addressed the accessibility of the subject lands for Active Travel. The MAs	Noted. In relations to MA37 see Chief Executives Response to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission.
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		also do not appear to consider the implications of introducing vulnerable road users to a junction on the N65, national road, requiring a crossing of the national road where a 100kph speed limit applies to access the lands. As outlined above the Council is aware that Section 2.7 of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) requires that planning authorities must exercise particular care in their assessment of LAP proposals relating to the development objectives and/or zoning of locations at or close to national road junctions. TII are not aware of any evidence base established to support the proposed zoning of the lands concerned. TII also notes the Recommendation of the Chief Executive that the zoning of the subject lands would compromise the strategic function of the N65 and compromise traffic safety on this higher-speed road. The TII concur with the Recommendation of the Chief Executive that the subject lands being located to the north of the N65 would compromise the strategic function and traffic safety on this highspeed National Road. The TII has determined the absence of any evidence-base to support the proposed zoning designation and, as such, supports the Recommendation outlined in the Chief Executive Report that the subject lands are not included in	
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		the LAP boundary and are not zoned 'Community Facilities' resulting from the impact the subject proposal could have on the strategic function and traffic safety of the N65, National Road. MA14 and MA33 The proposed MA to the LAP proposes changing the Land Use Zoning at this location from Agriculture' to 'Residential Phase 1' and 'Residential Existing' respectively. While the lands are accessed from the non-national road network, it is noted that the lands are proximate to the N65, National Road. The TII recommends that the development of the subject lands should confirm access to the non-national road in the first instance and should provide sufficient setbacks to safeguard the residential amenity of future residential development. TII will not entertain future claims in respect of impacts (e.g. noise, air, visual etc.) to future proposed development due to the presence of the existing national road or any future schemes in this area as a result of this proposed zoning amendment.	In relation to MA14 and MA33 the concern is relation to residential lands are noted. <i>Policy Objective NR4 New Accesses Directly on National Road</i> is included in the <i>Chapter 6 Transport and Movement in the GCDP 2022 – 2028</i> which limits accesses onto National Roads. In addition, Chapter 15 Development Management (DM) Standard 26 outlines the requirements to Access National and Other Restricted Roads for Residential Developments. Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission.</i>
GLW-C79-30	National Transport Authority (NTA)	The NTA welcomes the opportunity to comment on the proposed MA to the Draft Loughrea LAP and associated LTP and wishes to make the following observations and recommendation for consideration prior to adoption of the LAP. 1. MA34 and MA41 A consider quantum of Business and Technology lands have	Chief Executive Response Submission noted. In relation to MA34 and MA41 the concern in relation to

		been zoned on the eastern periphery on the Settlement Boundary. The submission expresses concern in respect to the access arrangement for the linear land holding with the subject lands front onto the R446. It is noted the LTP includes provision of a segregated cycle facility and footpath upgrades (WC8) along the R446 which would provide improved access by sustainable modes to/from locations along the R446 and the town centre. In addition, there are no proposal for alternative access to the land or improved permeability through the lands. However, given the extent and layout of the lands proposed for zoning and the potential trip intensive nature of uses the NTA raised concerns that the transport analysis and supporting measure in the LTP, to serve this location are lacking in detail and have not considered the potential impact on the existing network in particular at the junction with the R446. Development, in terms of layout, scale and density in this area should be contingent on the provision of an appropriate access plan with an emphasis permeability in particular for walking and cycling. The Phasing of development at this location will also be critical to ensuring that it develops in as sustainable a manner as possible. It is requested that in the event MA34 is brought forward, a special objective should be applied to the zoning which required the development of a masterplan for the lands that will include Phasing development supported by a Transport Plan with an emphasis on maximise the role of sustainable modes for travel to/from this location.	employment lands is noted. However, Loughrea has been identified as a 'Self-Sustaining Town' in the GCDP 2022 – 2028 which aims to promote Loughrea as a business destination, the economic status of the town must be encouraged and safeguarded. In Loughrea, there are approx. two hectares of Business and Technology lands within the existing IDA Business and Technology Park. MA34 is strategically located within the Settlement Boundary and adjacent to the IDA Business and Technology Park within an excellent transportation network. The lands are supported with specific measures in the LTP as noted in the NTA Submission. The Planning Authority note the concern raised in the submission, however at this stage of the LAP process it is considered prudent to uphold this rezoning. All the points referenced can be considered through the Development Management Process. A suite of positive Policy Objectives contained in Chapter 6 of the GCDP 2022 – 2028, NNR 1 Restricted Regional Road and Chapter 15 DM Standard 27 Access to National and Other Restricted Roads for Commercial & Other Development aims to support the transport function of Regional Roads and associated Regional Road junctions. Furthermore, there are a number of DM Standards which will also aid and support the configuration of the development through Masterplanning (DM Standard 1) and Phasing of Development (DM Standard 2) during the Development Management Process. The request to include a policy objective is noted, however, due
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		1. MA35 and MA36 Rezone a significant area of land to the north of the N65, outside the Settlement Boundary and in a peripheral location that is separated from the Town Centre and Residential areas. There are no proposed Transport network or access arrangements set out in the LTP to serve the zoning of the lands at this location for Community Facilities and, as such subsequent development is likely to be car-dependent. The submission notes while measure WC24 provides for 'designation as an on-street cycle route with footpath upgrades' along the Danesfort Road this stops south of the N65 and access to these lands by walking and cycling or links to public transport has not been provided. The ability to access lands by sustainable means must be a key consideration in the zoning of lands, particularly 'community' zoning which will likely generate travel demand from vulnerable users such as children. It is further noted the N65, National Secondary Road, is a strategic National Road providing regional and inter-regional linkages, including to the National Motorway network. The National Planning Framework (NPF) includes an objective (NSO 2) to maintain the strategic capacity and safety of the national roads network which is also set out in the existing Statutory Section 28 Ministerial Guidelines	to statutory provisions of a LAP only minor modification can take place at this stage of the process. The inclusion of a new policy objective is not a minor modification and therefore cannot be included. Submission Noted. In relations to MA35 and MA36 see Chief Executive's Response to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission.
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		<i>‘Spatial Planning and National Roads Guidelines for Planning Authorities’</i> (DoECLG, 2012). The NTA is concerned about the potential impact on the N65 of significant zoning at this location, in the absence of proposals to serve the lands by sustainable means and the likely result of car dependency of travel to/from the area. The view of the NTA is that MA35 and MA36 should not be brought forward into the final LAP as the proposed zoning at this location is not supported by transport provisions to facilitate development. As such, it is considered that these proposals would undermine the Draft LAP objective to promote sustainable settlement and transportation strategies. 2. MA37 Similar to the above, MA37 proposes the zoning of previously unzoned land outside the Settlement Boundary to Community Facilities. The submission outlines it is critical to access the lands sustainable means is a key consideration in the zoning of lands. The NTA express concern that accessibility these land by sustainable modes, particularly walking and cycling has not been fully considered or provided for in the LAP and LTP, likewise with MA35. The view of the NTA is that MA37 should not be brought forward into the final LAP as the proposed zoning at this location is not supported by transport provisions to facilitate development. 3. MA43, MA44, MA45 and MA46	Submission Noted. In relations to MA37 see Chief Executive’s Response to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission.
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	The NTA notes the proposed MA's 43 – 46 propose to amend the Walking and Cycling measures in the LTP. The implementation of walking and cycling and traffic management measures is critical in the context of meeting the LAP's aims and objectives to reduce car dependency in the town and encourage modal shift. The LTP has been prepared for Loughrea is based on a robust Area Based Transport Assessment (ABTA) approach. Measures detailed in the LTP are, therefore, based on an extensive baseline assessment and context assessment and have been assessed against LTP Objectives in a multi-criteria analysis in line with an evidence-based approach to planning. It is the view of the NTA that, in order to secure funding for Active Travel schemes, they should be clearly identified as part of the transport networks for the town within the LTP/LAP. The NTA outlined that the specific measure should be retained and that MA34 – MA36 should not be taken forward in the finalisation of the LAP and LTP. 4. MA47 Provides for changes to the LTP to include a Flow Chart and explanatory text relating to the process for and stage to be followed for the delivery of the LTP measures after the finalisation of the LTP. This highlights the need for scheme optioneering and design and the need to follow planning or other consent processes as appropriate. The NTA suggested some text amendments to the Flow Chart as follows; • Identification of Priority Projects - a statement should	The Planning Authority note the concerns. Upon review, it is not considered necessary or appropriate to make wording amendment with respect to the Walking and Cycling measures. Noted. It is considered that the proposed wording should be updated in Public and Stakeholder Engagement section of the Explanatory Note. Chief Executive Recommendation <i>See Chief Executives Recommendation to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission.</i> Update the text as follows in Flow Chart as Appendix D in LTP;
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		be included that these will have a ‘focus on the tone centre and area around schools’. Public and Stakeholder Engagement The elected members are taken through the options selection process and the preliminary design which will go to either full public consultation or more limited stakeholder engagement, as deemed appropriate depending on the scale of the project. This will not apply to minor works such as junction tightening.	Public and Stakeholder Engagement The elected members are taken through the options selection process and the preliminary design which will go to either full public consultation or more limited stakeholder engagement, as deemed appropriate depending on the scale of the project.
GLW-C97-7	Environmental Protection Agency (EPA)	The Environmental Protection Agency (EPA) has raised several points in their submission. Proposed SEA Determination The EPA notes the proposed determination regarding the need for SEA of the Material Alterations and that the SEA is required with respect to certain Material Alterations The submission observes their ‘SEA of Loughrea Authority Land Use Plan – EPA Recommendation and Resources’ guidance set out key recommendation for integrating environmental consideration in the Local Authority Land Use Plans. The guidance should be considered as appropriate and relevant to the Material Alterations. Sustainable Development	Chief Executive’s Response The Planning Authority welcomes the submission received from the EPA. The SEA process will consider these issues and ensure that all requirements are met until and following the adoption of the Plan. Noted. Noted.

		The EPA notes the Materials 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. It is noted the Material Alteration needs to align with national commitments on climate change mitigation and adaptation as well as incorporating any relevant recommendation in sectoral, regional and local climate adaptation plans. The submission further notes that the Draft Loughrea LAP should be consistent with key relevant higher-level plans and programmes. Specific Comments to be considered The EPA outlined key aspects below to be taken into account in preparing Material Alterations. Clear justification should be given when proceeding with Material Alteration having likely significant environmental effects or which conflict with national environment or planning policy. The Draft Loughrea LAP should also consider and integrate recommendation of the SEA prior to its adoption. Future Modifications to the Draft Plan	Noted. Noted. Noted. Noted.
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	The submission notes further changes to the Draft Loughrea LAP should be screened for likely significant effect in accordance with SEA Regulation and should be assessed as the “environmental assessment” of the Draft Loughrea LAP. SEA Statement – “Information on the Decision” The EPA suggest once the Final LAP is adopted to prepare an SEA Statement that summarises the following: • How environmental consideration have been integrated into the LAP; • How the Environmental Report, submissions observations and consultation have been taken into account during the preparation of the LAP; • The reasons for choosing the LPA 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. The submission notes a copy of the SEA Statement should be sent to any environmental authority consulted during the SEA process and suggest their guidance on preparing SEA Statements. Environmental Authority The EPA observes under the SEA Regulation, the following authorities should be consulted: • Environmental Protection Agency; • Minister for Housing, Local Government and Heritage; • Minister for Environment, Climate and	Noted. Noted. Noted. Chief Executive’s Recommendation No Change.
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		Communication; and, Minister for Agriculture, Food and the Marine. Any adjoining Planning Authority whose area is contiguous to the area if a Planning Authority which prepared a Draft Plan, proposed variation or LAP.	
GLW-C97-1	Tipperary County Council	Tipperary County Council had no observations to make regarding the proposed Material Alteration on the Draft Loughrea LAP and Associated documents.	Chief Executive's Response Submission Noted. Chief Executive's Recommendation No Change.

Councillors/TD's			
Submission No.	Submission Name	Summary of Issues Raised in Submission	Chief Executive's Response
GLW-C79-8	Cllr Jimmy McClearn	The submission welcomes MA13, MA35, MA38 and MA39. The submission supports the community movement to provide a Public Swimming Pool in Loughrea and requests its aspiration to be included as a Policy Objective in the Loughrea LAP 2024-2030.	Chief Executive's Response Submission noted. The request to include a Policy Objective is noted, however due to the statutory provisions of a LAP only minor modification can take place at this stage of the process. The inclusion of a new Policy Objective is not a minor modification and therefore cannot be included at this stage of the LAP process. Chief Executive's Recommendation No Change
GLW-C79-9	Cllr Shane Curley	The submission reiterates support for MA13, MA35, MA38 and MA39, regarding the provision of a Public Swimming Pool in Loughrea. In addition, the submission requests a partnership between the County Council and the Loughrea Local Swimming Pool advocacy group to deliver the Public Swimming Pool.	Chief Executive's Response Submission noted. Chief Executive's Recommendation No Change.
GLW-C79-10	Cllr Declan Kelly	The submission supports MA12, MA35, MA38, and MA39. The submission seeks the inclusion for a Policy Objective in the Loughrea LAP to make a publicly owned, swimming pool in Loughrea.	Chief Executive's Response See Chief Executives Response to GLW-C97-8. Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C97-8.</i>
GLW-C79-13	Cllr Michael Maher	The submission seeks the inclusion of an objective in the Loughrea LAP to make a publicly owned, swimming pool in Loughrea. It noted the need for the Public Swimming Pool to	Chief Executive's Response See Chief Executives Response to GLW-C97-8.

		support the current and the projected population growth of Loughrea.	Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C97-8.</i>
GLW-C79-18	Cllr Ivan Canning	The submission welcomes MA13 and MA35. It noted support for the provision of a Public Swimming Pool in Loughrea. In addition, the submission noted the health and wellbeing benefits a Public Swimming Pool would bring to Loughrea.	Chief Executive's Response Submission noted. Chief Executive's Recommendation No Change
GLW-C97-6	Sean Canney TD	The submission supports all Material Alterations that zone lands in the LAP Community Facilities. The submission seeks the inclusion of an objective in the Loughrea LAP to make a publicly owned, public owned, public swimming pool in Loughrea.	Chief Executive's Response See Chief Executives Response to GLW-C97-8. Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C97-8..</i>
GLW-C79-12	Ciaran Cannon TD	The submission seeks the inclusion of an objective in the Loughrea LAP to make a publicly owned, swimming pool in Loughrea. It noted the need for the Public Swimming Pool to support the current and the projected population growth of Loughrea. The submission supports the designation of sufficient lands with the appropriate zoning for the development of a public swimming pool another community facilities.	Chief Executive's Response See Chief Executives Response to GLW-C97-8. Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C97-8.</i>
GLW-C97-38	Anne Rabbitte TD	The submission outlines support for MA13 and MA35. The submission expresses concern regarding the lack of public swimming pool facilities in Loughrea, the need for the provision for a public swimming pool to support the growing population of Loughrea. In addition, the submission expresses support for the 1,300 member Local Community Group.	Chief Executive's Response See Chief Executives Response to GLW-C97-8. Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C97-8.</i>

General Submissions			
Submission No.	Submission Name	Summary of Issues Raised in Submission	Chief Executive's Response
GLW-C97-3	MKO on behalf of Brian Henehan	The submission fully supports MA20. The submission refers to a previous submission made on the Draft Plan (GLW-C79-396). The Material Alteration is welcomed, and it is deemed that the lands are appropriate for the Residential Phase 1 zoning objective. The Material Alteration has been supported by a robust justification.	Chief Executive's Response Submission Noted. As part of the submissions received on the Draft Plan, it was considered appropriate to zone the land's Residential Phase 1. Chief Executive's Recommendation No Change.
GLW-C97-4	MKO on behalf of Thomas Claffey	The submission fully supports MA14. The submission refers to a previous submission made on the Draft Plan (GLW-C79-263). The Material Alteration is welcomed, and it is deemed that the lands are appropriate for the Residential Phase 1 zoning objective. The Material Alteration has been supported by a robust justification.	Chief Executive's Response Submission Noted. As part of the submissions received on the Draft Plan, it was considered appropriate to zone the land's Residential Phase 1. Chief Executive's Recommendation No Change.
GLW-C79-31	Brian Curran	The submission fully supports MA16. The submission notes the zoning of subject lands for residential development will provide much needed housing to Loughrea.	Chief Executive's Response Submission Noted. As part of submission received on the Draft Plan, it was considered appropriate to zone the land parcel Residential Phase 1. Chief Executive's Recommendation No Change.
GLW-C79-34	Brian Curran	A comprehensive submission was received, emphasising the need to amend MA38. The submission requested extending MA38 eastward, extending the Settlement Boundary and	Chief Executive's Response Submission Noted. The Chief Executive's Response and Recommendation to the previous submission (GLW-C79-

		zoning the subject lands Residential Phase 1. The submission indicated the lands are ideally suited for development due to their proximity to Cross Street School Quarter and access to the Town Centre. The submission also expressed support for the implementation of the Eastern Bypass (RT2) as outlined in the LTP.	434) is still relevant. The request to extend the Settlement Boundary and zone lands Residential Phase 1 is noted, however, due to 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. Chief Executive's Recommendation No Change.
GLW-C97-36	Enviroplan Ltd on behalf Leadlane Ltd.	A submission was received requesting that the subject lands (MA15) are rezoned from Residential Phase 1 to Residential Infill. The submission notes in the event that the Planning Authority or OPR have fundamental concerns with the Residential Phase 1 zoning as set out in the proposed Material Alterations. The submission requests that the Residential Infill zoning should be considered as an alternative. The submission is supported by a robust justification.	Chief Executive Response Submission noted. The draft LAP was prepared in accordance with the core strategy of the Galway GCDP 2022-2028. The Elected Members brought forward a motion to reject the Chief Executive recommendation. Subsequently the members reallocated a quantum of Residential Phase 1 to subject lands in accordance with core strategy GCDP 2022-2028. The Planning Authority considers it appropriate to zone the lands Residential Phase 1. Chief Executive Recommendation No change.
GLW-C97-37	Enviroplan Ltd on behalf Leadlane Ltd.	A submission was received requesting that the subject lands (MA16) are rezoned from Residential Phase 1 to Residential Phase 2. The submission notes in the event that the Planning Authority or OPR have fundamental concerns with the Residential Phase 1 zoning as set out in the proposed Material Alterations. The submission requests that the Residential Phase 2 zoning should be considered as an alternative. The submission is supported by a robust justification.	Chief Executive Response Submission noted. The draft LAP was prepared in accordance with the core strategy of the Galway GCDP 2022-2028. The Elected Members brought forward a motion to reject the Chief Executive recommendation. Subsequently the members reallocated a quantum of Residential Phase 1 to subject lands in accordance with core strategy GCDP 2022-2028. The Planning Authority considers it appropriate to zone the lands Residential Phase 1.

			Chief Executive Recommendation No change.
GLW-C79-14	Genesis Planning Consultants on behalf of Roberto Property Company Ltd.	A comprehensive submission was received in relation to lands at Cosmona, Loughrea. The submission references their previous submission (GLW-C79-333) received during the public consultation on the Draft LAP and the subsequent Chief Executive's Report and Recommendation to zone lands Residential Phase 1, Residential Phase 2 and Public Open Space. The Draft Plan submission welcomed the recommendation of the Chief Executive as the proposed zonings would facilitate residential development. This current submission notes that the lands at Cosmona are now proposed as Residential Phase 2, Public Open Space and Community Facilities. These are identified as MA 9, MA 21 and MA 22 listed below; • MA 9: To rezone land from Residential Phase 2 to Community Facilities • MA 21: To rezone lands from Residential Phase 1 to Residential Phase 2 • MA 22: To rezone lands from Residential Phase 1 to Residential Phase 2	Chief Executive's Response Submission noted. The Draft LAP was prepared in accordance with the Core Strategy of the GCDP 2022 – 2028. The Chief Executive Report on the Draft Plan recommended to rezone two land parcels Residential Phase 1 and Open Space/Recreation and Amenity. However, the Elected Members brought forward a motion to reject the Chief Executive's Recommendation and dezone a further quantum of Residential Phase 1 lands (MA21 and MA22). Subsequently, the Member's reallocation of Residential Phase 1 lands is in accordance with the Core Strategy of the GCDP 2022 – 2028. In addition, the members rezoned an element of Open Space/Recreation and Amenity (MA23) which was not referenced in the submission. The submission indicated a shortfall of housing and expressed concern regarding density, housing allocations and LAP durations. The allocation of housing units for this Self Sustaining Growth Town is derived from the Core Strategy within the Galway County Development Plan 2022 – 2028. In relation to MA15, MA16, MA24, MA20, MA17, MA18, MA19 and MA14 the determining of zoning was completed in accordance with Appendix 3 of the NPF. The Infrastructure Assessment accompanied the proposed Material Alterations

		Submission states that the Material Amendments are resulting in a net reduction of 4.5 hectares of Residential Phase 1 lands. The submission states that the proposed MAs are serviced, adjacent to the school and it is stated are not in the interest of proper planning and sustainable development. The provision of Community Facilities zoned lands proposed previously is highlighted. It is also stated that the landowner is aiming to deliver housing units. The loss of 4.5 hectares of Residential Phase 1 lands, it is stated, is now in jeopardy. The submission states that there has been a significant shortfall in housing delivery under both the previous and current Development Plans and at the LAP level in Loughrea. The submission provided an analysis of the delivery of houses/apartments in the county and queried the GCDP 2022 – 2028 and the Core Strategy and made a number of observations in respect to that. The submission notes a review of all MAs and highlights a number of MAs (MA15, MA16, MA24, MA20, MA17, MA18, MA19 and MA14) and states that they are not in accordance with the approach to determine zoning as per Appendix 3 of the NPF. The submission suggests a number of the alternative zonings are also contrary to Recommendation 1 of the OPR's	on public display (attached as Appendix F Infrastructure Assessments on Proposed Residential Lands) illustrates the MAs noted above are identified as Tier 1 serviced lands comprising of lands that are able to be connected to existing development services for which there is service capacity available and can therefore accommodate new development. Furthermore, the submission suggests a number of MAs are contrary to Recommendation 1 of the OPR's submission (GLW-C79-437) in the Draft Plan and contrary to sequential development. It should be noted Recommendation 1 of the OPR's submission on the Draft Plan relates to Existing Residential lands and specifically isolated individual residential units at peripheral locations on the Settlement Boundary. The concern raised by the OPR was clarified in the Chief Executive Report on the Draft Plan which stated no change. Chief Executive's Recommendation No Change.
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		submission (GLW-C79-437) in the Draft Plan and sequential development. It is stated that no justification is provided for the zoning amendments and no settlement capacity audit has been carried out to inform the zoning proposal. The submission included an extract from section 6.2.3 of the Section 28 Guidelines 'Development Plan Guidelines for Planning Authorities (2022). The submission highlights a settlement capacity audit is required to be consistent with the Section 28 Guidelines. It is submitted that the adoption of the MA's as published will undermine the existing CDP with the aims and objectives failing to be realized in terms of delivery housing on Tier 1 Serviced Lands. It is further stated that the recommendations incorporated into the MAs are considered contrary to the proper planning and sustainable development of Loughrea. The submission contends that the Core Strategy in the GCDP expires in 2028. The case is put forward for an additional quantum of residential land zoning and associated housing up to 2030. The submission requests the following; • To zone lands as per the recommendation of the Chief Executives Report on the Draft Plan public consultation. Furthermore, to avoid a net increase in Residential Phase 1 lands it is requested that MA15, MA16, MA24, MA20, MA17, MA18, MA19 and MA14 are not brought forward,	
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		• A Settlement Capacity Audit is carried out as per Section 28 Development Plan Guidelines, and; • Recommendation 1 as per the OPR's submission (GLW-C79-437) is incorporated in the Draft Plan.	
GLW-C97-2	MKO on behalf of MPD Property Developments Limited	The submission fully supports MA26. The submission refers to a previous submission made on the Draft Plan (GLW-C79-310). The Material Alteration is welcomed, and it is deemed that the lands are appropriate for the Residential Infill zoning objective. The Material Alteration has been supported by a robust justification.	Chief Executive's Response Submission Noted. As part of the submissions received on the Draft Plan, it was considered appropriate to zone the land's Residential Infill. Chief Executive's Recommendation No Change.
Open Space/Recreation and Amenity			
GLW-C79-33	Brian Curran	The submission fully supports MA23. The submission refers to a previous submission made on the Draft Plan (GLW-C79-353). The Material Alteration is welcomed, and it is deemed that the lands are appropriate for the Open Space/Recreation and Amenity zoning objective. The Material Alteration has been supported by a robust justification.	Chief Executive's Response Submission Noted. As part of the submissions received on the Draft Plan, it was considered appropriate to zone the land's Open Space/Recreation and Amenity. Chief Executive's Recommendation No Change.
Community Facilities			
GLW-C97-5	Colm O'Donnell on behalf of It's Time for a Public Swimming Pool in Loughrea	The submission expresses the Community Groups 1300 members' support for MA13 and MA35. The submission outlines the need for a Public Swimming Pool in Loughrea and Connaught aiding the health and well-being of the community. In addition, the submission requests for the Loughrea LAP to include a publicly owned, public swimming	Chief Executive's Response Submission Noted. In relations to MA35 see Chief Executive's Response to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission. See Chief Executives Response to GLW-C97-8.

		pool in Loughrea as a Policy Objective.	Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission.</i> <i>See Chief Executives Recommendation to GLW-C97-8.</i>
GLW-C97-11	Ailish O'Reilly	The submission outlines the support for MA13 and MA35. The submission raised several points as follows; • Accessible facility for all of the community • Provision of a public swimming pool would provide various benefits including enhancing the overall health and well-being of the community. • The provision of community amenities is needed in Loughrea town to support the current town size and projected population.	Chief Executive's Response Submission Noted. In relations to MA35 see Chief Executives Response to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission. Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission.</i>
GLW-C97-16	Maria Walsh	The submission outlines support for MA13 and MA35. The submission highlights the need for the provision of a public swimming pool to support the growing population of Loughrea. In addition, the submission expresses support for the 1,300 members Local Community Group.	Chief Executive's Response Submission Noted. In relations to MA35 see Chief Executives Response to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission. Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission.</i>
GLW-C97-17	Chris MacManus	The submission highlights support for MA13 and MA35. The submission notes the need for a Public Swimming Pool in Loughrea and expresses support for the 1,300 member Local Community Group.	Chief Executive's Response Submission Noted. In relations to MA35 see Chief Executives Response to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission.

			Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission.</i>
GLW-C97-19	Louis O'Hara	The submission outlines support for MA13 and MA35. The submission highlighted the need for the provision for a public swimming pool to support the growing population of Loughrea. In addition, the submission expresses support for the 1,300 member Local Community Group.	Chief Executive's Response Submission Noted. In relations to MA35 see Chief Executives Response to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission. Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission.</i>
GLW-C97-20	Fergal Landy	The submission outlines support for MA13 and MA35. The submission highlighted the need for the provision for a public swimming pool to support the growing population of Loughrea. In addition, the submission expresses support for the 1,300 member Local Community Group.	Chief Executive's Response Submission Noted. In relations to MA35 see Chief Executives Response to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission. Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission.</i>
GLW-C97-21	Emma Sheeran	The submission outlines support for MA13 and MA35. The submission highlighted the need for the provision for a public swimming pool to support the growing population of Loughrea. In addition, the submission expresses support for the 1,300 member Local Community Group.	Chief Executive's Response Submission Noted. In relations to MA35 see Chief Executives Response to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission. Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission.</i>
GLW-C97-22	Luke 'Ming' Flanagan	The submission outlines support for MA13 and MA35. The submission highlighted the need for the provision for a public	Chief Executive's Response Submission Noted. In relations to MA35 see Chief Executives

		swimming pool to support the growing population of Loughrea. In addition, the submission expresses support for the 1,300-member Local Community Group.	Response to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission. Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission.</i>
GLW-C97-23	Ollie Turner	The submission outlines support for MA13 and MA35. The submission expresses concern regarding the lack of public swimming pool facilities in Loughrea, the need for the provision for a public swimming pool to support the growing population of Loughrea. In addition, the submission expresses support for the 1 300 member Local Community Group.	Chief Executive's Response Submission Noted. In relations to MA35 see Chief Executives Response to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission. Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission.</i>
GLW-C-24	Ollie Turner	The submission outlines support for MA13 and MA35. The submission expresses concern regarding the lack of public swimming pool facilities in Loughrea, the need for the provision for a public swimming pool to support the growing population of Loughrea. In addition, the submission expresses support for the 1 300 member Local Community Group.	Chief Executive's Response Submission Noted. In relations to MA35 see Chief Executives Response to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission. Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission.</i>
GLW-C79-25	Michelle Gildernew	The submission outlines support for MA13 and MA35. The submission expresses concern regarding the lack of public swimming pool facilities in Loughrea, the need for the provision for a public swimming pool to support the growing population of Loughrea. In addition, the submission expresses support for the 1,300 member Local Community Group.	Chief Executive's Response Submission Noted. In relations to MA35 see Chief Executives Response to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission. Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C97-35 in</i>

			<i>relation to Recommendation 1 of the OPR Submission.</i>
GLW-C79-26	Mark Larkin	The submission outlines support for MA13, MA35, MA38 and MA39 regarding a Public Swimming Pool in Loughrea. The submission raised several points as follows; • The provision for sufficient land to be zoned for Public Amenities such as swimming pools and playing pitches to facilitate the current and forecasted growing population. • The distance required to travel to relevant sport facilities such as Pearse Stadium was expressed.	Chief Executive's Response Submission Noted. In relations to MA35 see Chief Executives Response to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission. Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission.</i>
GLW-C79-32	Colm O'Donnell	A submission was received supporting MA35. The submission notes the option of a flyover for pedestrians and cyclists to ensure safe access to the proposed lands outside the Settlement Boundary. In addition, the submission notes the importance of MA35 for the development and wellbeing of the Loughrea community.	Chief Executive's Response Submission Noted. In relations to MA35 see Chief Executives Response to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission. Chief Executive's Recommendation <i>See Chief Executives Recommendation to GLW-C97-35 in relation to Recommendation 1 of the OPR Submission.</i>