

On the proposal of Cllr Maher and seconded by Cllr Conneely it was agreed to accept the recommendation in the Manager's Report

4. **Gerry Moloney, C/O Gabriel Dolan & Associates, Main Street, Craughwell, Co. Galway.**

Synopsis.

The submission requests that

1. The lands outlined in red and shaded in green on the attached map be zoned as residential.

The land area contains approximately 1.26 h.a. and is located close to the village centre with direct access to the new train station via a new bridge over the Dunkellin River (as granted under Pl. Ref. No. 07/1922). The development will also be serviced by a collector road which will run from Gleantan na hAbhann at its southern end to the N6 of the Athenry Road. It is hoped that the lands will be zoned high density due to its superior location within walking distance of the village and railway station.

Response

Development in Craughwell generally follows the north-south alignment of the main Galway-Dublin Road (N6).

- The N6 provides access to adjacent lands but also acts as an environmental and social barrier in terms of noise and safety.
- The rail line has acted as a constraint to the development of lands to the west of the N6.
- The flooding has also acted as a physical constraint in the consolidation of the village. This segregation is evident in the form of the village.

The submission lands are composed of 3.08 acres (1.25h.a.) and consist of a linear strip located west of the railway line and outside the Development Plan Boundary. A small portion of the lands adjoin the N6 immediately north of the railway crossing in an area where the current 60km/h applies. In the absence of the provision of pedestrian over-bridges/alternative route to the centre of the village, this area remains isolated and land locked.

Entry/exist from the portion of lands north of the railway crossing would be in conflict with NRA policy in relation to access onto National Roads such as 'Development Control Advice and Guidelines'(1982) and to 'Policy and Planning Framework for Roads' (1985) and to paragraph S.3.3.4 of the Sustainable Rural Housing Guidelines (2005).

The LAP must also be consistent with the GCDP 2009-2015, which provides a strategic vision for growth in the village and sets out a house construction allocation for Craughwell based on the Settlement Strategy for the County. The Craughwell LAP reflects this strategic view and the allocated house construction allocation, which will necessarily mean that the village will continue to grow, develop and change over time.

The inclusion of the submission lands into the Draft Plan would not be considered appropriate for the following reasons:

- The development potential of the undeveloped lands in the Draft Plan area represents approximately twice the house construction allocation allowed for Craughwell in the new CDP 2009-2015. This development potential has been based on the Density Guidelines and Potential Development Yield as shown within Table 5a on Page 18 of the Draft Plan. By expanding the Development Plan Boundary would result in an even greater potential development yield than is estimated within the Draft Plan and within the CDP 2009-2015. Given the availability of a substantial amount of undeveloped lands, in excess of that required of the 6 year plan period, future development should be strategically directed to best achieve orderly development and the sequential approach to development as outlined in the Draft Craughwell Plan.

- The extension of the Plan Boundary to encompass the subject lands will set a precedent for the extension of the Village west of the railway line in other locations. This which will be counter to the overall strategy of consolidating the village and retaining the character and setting of the village, will significantly increase the number of housing units that can be developed, will place additional pressure on the already limited public infrastructure and facilities, etc. In the absence of certain essential infrastructure including public sewerage, the extension of the Plan Boundary west of the Railway line is considered to be premature and inappropriate at this time.
- Access/exit from the submission lands onto the N6 would be contrary to NRA Policy, with the CDP 2009-2015 and with new **Policy TA2** as contained within S.4.3 of the Draft Craughwell LAP.
- The size and configuration of the land by itself (if it was included and zoned as Residential within the Draft Plan) would not be conducive to the delivery of Part V provision.
- The subject lands have very limited road frontage and would most likely result in a backland type development pattern if developed at higher densities, which would not be appropriate in this area.
- The subject lands are dissected by the railway line and are not contiguous with the boundary of the Outer Village area to the north east of the Plan Area.

Recommendation

No change recommended. The inclusion and zoning of the submission lands as Residential is considered inappropriate at this time. No change to the Draft Plan.

The Mayor stated that he was disappointed that the western side of Craughwell village was being ignored in the Draft Plan and added that this was the side nearest the proposed railway station and the Galway side of the railway crossing. He also added that the school and all the main pitches were also on this side of the village.

Mr Ridge stated that Craughwell was a progressive town but that it would be premature to zone these lands now and added that Craughwell has the potential to provide a total housing capacity of 921 housing units. If these lands are opened up for development it will create two sprawling villages.

He added that the school wasn't in a good location.

Cllr Willers stated that she agreed with the Mayor and pointed out that economics would determine the future requirements for the village. She also queried the similarity between the Craughwell Plan and the Bearna Local Area Plan.

In reply to Cllr Willers query Mr Ridge stated that the Craughwell Local Area plan was similar to the Bearna Local Area Plan in that it had a combination of mixed use zoning and development areas.

The Mayor stated that allowing the development of these lands would create a link between the school and the village.

Mr Cullen stated that in relation to the Craughwell Sewage Scheme that discussions were ongoing with the National Parks and Wildlife services in relation to the type and level of tertiary treatment that will be required for this plant and added that the Part 8 procedure for this scheme is expected to commence later this year.

Cllr Willers enquired if the Sewage Scheme will include the school. Mr Cullen stated that he would check this as he did not have the details on hand.

On the proposal of Cllr Feeney and seconded by Cllr Regan it was agreed not to accept the recommendation in the Manager's Report but to extend the plan boundary and zone the lands the subject of Submission 4 Outer Village.

5. Daragh Raftery & Enda Hallinan, C/O Gabriel Dolan & Associates, Main Street, Craughwell, Co. Galway.

Synopsis.

Submission requests that

1. the lands as outlined in the enclosed map and coloured yellow be zoned as commercial/industrial/residential
2. the lands shaded blue be zoned as residential in the upcoming Craughwell Development Plan.

The submission states that the proposed commercial zoning will have the added advantage of servicing the Village Centre with larger units which will compliment smaller units located in the central area without adequate storage. The commercial units will also have direct access to the N6 through a local link round as shown on the enclosed map. The submission also notes that residential development has taken place along local road L311-1 and that the shaded area in blue on the map is merely an extension of previously granted developments. These lands are also noted as being within walking distance of the village services, railway station and sporting activity. The submission notes that when developed the lands will provide for much needed road widening of the Ballymore Road (L311-1).

Response

The main aims for the development of Craughwell is to provide a mixed use zoning framework for the Plan Area, to direct development in a manner that ensures complimentary uses, consolidates development in the village centre, enhances the existing landscape setting, character and identity of the village and complies with the statutory requirements in the PDA 2000 and to direct development into locations that best suit the development areas and density provisions.

The Objectives of the Draft Craughwell LAP are as follows:

- Objective LU3.2:** Encourage sequential development in the Plan Area, from centre outwards, in order to ensure that the higher order facilities and the higher density developments are located on the most central lands with the optimum access and the highest level of services.
- Objective LU2.1:** Promote the development of the Village Core as a vibrant well-designed area and encourages development that compliments and contributes to the local mix of uses and provides definition to the main street.
- Objective LU2.2:** Develop the Inner Village as a well connected accessible area and promote development that contributes positively to the Village Core Area and village environment.

S.9 Economic Development of the Draft Plan seeks to improve the overall quality of life by supporting the local economy and encouraging new development in the appropriate area to the character of Craughwell. The Draft Plan also encourages that any new planned development should be contained within the existing village structure as much as possible.

- Objective ED.1.1** GCC will allow small scale commercial/retail developments, which are in character with existing village properties provided that the

scale of provision and the type of goods sold clearly indicate the shop is primarily designed to cater for the needs of the village and its catchment population.

Objective ED2.5 To encourage medium and small scale- industrial development within the Inner Village and Outer Village Area

S. 13.8.6 Enterprise and Tourism Development (p.72): states that small scale enterprise is primarily encouraged on land designated for Enterprise and Industrial Development. The standard plot ratio for enterprise and industrial development is 1.00 whilst the site coverage index is 80%.

Contrasting this with **Table 5a Density Guidelines and Potential Development Yield (p. 18)** the most appropriate location for industrial location is within the **Village Core (PAR 1.00 with Max Site Coverage 40-60%)** of the Development Boundary.

Residential development in recent times has extended north eastwards from the village along the Ballymore Road (L311-1). Two new housing estates Sli na gCapall and Ballymore Lane have recently been constructed and are located where the current 80km/h speed limit applies. Entrances to both estates are located prior to the first entrance that leads to the Blazer Kennells. There is an absence of public street lighting and public footpaths along the Ballymore road except for along the site frontage of Sli na gCapall housing estate.

A number of planning permissions 05/2217, 06/2172 and 07/4386 (shaded blue on the submission map) have been granted and the Council is committed to their future development. A new private WWTP is under construction to the north east of these lands (shaded in yellow on the submission map) with a R.O.W. as per site layout under planning application 07/4386.

Planning permissions:

- | | |
|----------|---|
| 05/2217: | Planning permission granted on the 3/04/2006 for the construction of 36 no. dwelling houses dwellings including a proprietary effluent treatment plant and percolation area along with associated site development works (4233 sqm) |
| 06/2172: | Planning permission granted on the 18/12/2006 for the construction of 16 no. dwelling houses, including a proprietary effluent treatment plant and percolation area along with associated site development works to be accessed through previous approved planning application ref no. 05/2217 (gross floor space 1808sqm) |
| 07/4386 | OPP for a creche and full permission granted on the 18/02/08 for the construction of 20 no. dwelling houses, including a proprietary effluent treatment plant and percolation area along with associated site development works all accessed though previously approved Pl. Ref. No. 06/5705 (Gross floor area 2404.4 sq.m.) |
| 08/283 | Planning permission for the construction of 30 no. semi-detached dwelling houses including a proprietary effluent treatment plant and percolation area along with associated site development works. All accessed through previously approved development Pl. Ref. No. 05/2217 (Gross floor area 3478.6 sq.m.). Planning application was withdrawn. |

The present layout of the Draft Development Boundary does not include those lands that have been committed to development by the Council and it is proposed to amend the Boundary to reflect site layouts for planning applications – 05/2217, 06/2172, 07/4386 and 08/283. It is also recommended that these lands should be zoned as Outer Village Area with 20 housing units as the average number of dwellings per hectare.

The total area for these lands is 4.66 h.a. or __ acres. This area only includes the southern portion of the submission lands that are shaded in blue.

In relation to planning application 07/4464 and possible future link road to the N6 – Site layout map as per 07/4464 only indicates an access road located south of the railway crossing on the N6 and which only services the site layout as per 07/4464.

The PA considers it in appropriate to zone any further lands for either commercial/industrial/residential (those shaded in yellow and those shaded in blue that are not committed to development within submission No. 5) along the Ballymore road for the following reasons:

- No new significant development will be permitted until such time as the public WWTP has been substantially completed. Refer to Section 8.1.1 Water Services Wastewater Treatment and Disposal.
- The extension of the boundary to areas that have not been committed to development and to encompass additional lands (as outlined in blue and yellow on the submission map) will set a precedent for the extension of the boundary in other locations, which will be counter to the overall strategy of consolidating the village and retaining the character and setting of the village, will significantly increase the number of housing units that can be developed, will place additional pressure on the already limited public infrastructure and facilities, etc.
- The consolidation of the village and the prevention of further unsustainable ribbon development is a key aim of the LAP and forms the basis for the land use zones and areas identified in the LAP. Proposals that seek to extend the plan boundary will have the effect of undermining the consolidation of the village, with resultant impacts in terms of ribbon development, sprawl, visual, landscape and environmental impacts, inefficient use of development land and infrastructure, etc.
- Tracts of undeveloped land have been identified during the plan making process – these land are located west of the Main Street, the North-east of the LAP area and around the rail station area.
- The PA considers that there are sufficient lands zoned as Village Core and Inner Village Core to accommodate lands for commercial/enterprise/industrial/ use that have a higher PAR and Site Coverage than Outer Village Area.
- The PA proposes to extend the development boundary and zone as Outer Village Area to those lands that GCC is committed to develop. The development potential of the undeveloped lands in the Draft Plan area represents approximately twice the house construction allocation allowed for Craughwell in the new CDP 2009-2015. Inner Village Area shall not be considered as it would yield a higher density development and greater household construction than is required for Craughwell at this time.

Recommendation

Amend the Draft Development Boundary to include those lands that have been committed to development by GCC. The PA considers that Outer Village Core to be the most appropriate

zoning for these lands at this time. It is considered not appropriate to enlarge the Development Boundary any further. Amend the Draft Plan.

On the proposal of Cllr Fahy and seconded by Cllr Maher it was agreed to extend the plan boundary and zone the lands the subject of Submission 5 Outer Village area.

6. Patrick O' Sullivan, Spatial Policy, Department of Environment Heritage & Local Government Daragh Raftery & Enda Hallinan, C/O Gabriel Dolan & Associates, Main Street, Craughwell, Co. Galway.

Synopsis.

1. The Department notes that the Draft Craughwell LAP does not include existing population figures or projected targets. The Council is advised to consider amending the Draft LAP to include a section on the existing and future population and demographics trends within Craughwell. This should provide clarity in relation to the evidence basis on which the housing allocations of 70 units has been generated within the context of the County Development Plan and the County Housing Strategy. It would provide a context within which future housing allocation could be justified and understood.
2. The Council have decided that the Draft LAP will be screened for Appropriate Assessment under the Habitats Directive 92 / 43 / EEC before it is adopted by the Elected Members. This position is contrary to that established by Circular Letter SEA 1/08 & NPWS 1/08 which requires that a Draft Plan must be screened for any potential impact on areas designated as Natura 2000 and that any mitigation measures or measures proposed to avoid impacts on Natura 2000 sites should be incorporated into the policy or detail of the Draft Plan before finalisation. The impacts assessed must include the indirect and cumulative impacts of approving the Plan, considered with any current or proposed activities, developments or policies impacting on the site. Furthermore, Circular Letter SEA 1/08 & NPWS 1/08 states that a planning authority cannot adopt a Plan or any part of such a Plan where a significant impact on a Natura 2000 site is likely.

Accordingly, the Council is advised to adopt the precautionary principle in this regard and reconsider its position in this instance in light of the proximity of the Draft LAP to the Rahasane, Turlough and Galway Bay Inner/Complex Natura 2000 sites, the fact that the Craughwell/Dunkellin River is vulnerable to flooding due to a raised water table in winter months and that there is no public waste water treatment network or facility in Craughwell. It is recommended that the Draft LAP, and any subsequent amendments to the Draft, **are screened for Appropriate Assessment** in relation to its impact on the aforementioned Natura 2000 sites in advance of the adoption of the Plan.

3. The Draft LAP should be revised in order to make appropriate reference to "*The Provision of Schools and the Planning System A Code of Practice for Planning Authorities, the Dept of Education & Science & DEHLG*" (July 2008).
4. Nature Conservation - Galway County Council is in the process of undertaking Appropriate Assessment (AA) screening for the LAP as per section 14.3.1 of the Local Area Plan, and the Department will assess the provision of this screening or full AA report for further comment, as necessary. The Department again emphasises that AA must inform all sections of the plan, and all its policies and objectives, and must amend the content and detail of the Plan, as necessary. Any mitigation measures arising from the AA must be incorporated into the plan. Any subsequent changes or amendments to the Plan must be screened for their likely significant effects on Natura 2000 sites. The findings of the AA must be taken into account by the competent authority, Galway County Council, in reaching its decision to authorise the Plan. A

final statement on whether or not the Plan, on its own or in combination with other plans and projects, will affect the integrity of a Natura 2000 site, will also be required, again, prior to adoption of the Plan.

5. It is considered that some of the text in Section 10 of the Draft Plan should be clarified and strengthened. It is recommended that the text at Objective EH2.11 is reviewed and revised, viz.

"Encourage the rehabilitation, restoration, re-use or change of use as appropriate of older buildings of architectural heritage merit in the village in order to maintain a viable future for those structures, and similarly encourage the rehabilitation, restoration, re-use or change of use its protected structures."

6. It is recommended that the text at **Objective EH2.14** and **Objective EH2.20** might be combined, as both deal with 'street pattern'.
7. It is recommended that the text at **Objective EH2.22** might make reference to the 'preservation' rather than 'protection' of the character of the ACA in line with the provisions of what Chapter II of Part IV of the 2000 Planning and Development Act. In that regard the **text in Objective EH2.19** might be reviewed as it appear to contain a typographical error. The text might be combined with that in **Objective 22** in order to set out a coherent approach to the preservation of the character of the ACA rather than specifically protecting individual structures within it.

At present **Policy EH2.22** states, viz.

"Protect, conserve and enhance the essential character of the proposed ACA through the control of the design, location and layout of new properties or the alteration or extension of existing ones."

The text might be revised to read, for instance,

"Preserve the character of the Craughwell ACA through encouraging the design, location and layout of new development and the alteration of existing structures in a manner which enhances that character."

Response

1. **The omission of Existing Population or Projected Targets within the Draft Plan.**

The PA notes this omission and shall include a new Section – **Section 2.4 Existing and Future Population and Demographic Trends within the Draft Craughwell LAP.**

Amend text of Draft Plan to include the following preamble within **S.2.4** to read as follows:
'The 2002 Census recorded a population of 358 persons for Craughwell. By 2006, this figure has increased to 414 persons – an increase of 15.6%. This represents an actual increase of 56 persons. Using the MIF2 population projection scenario the future population horizon for Craughwell is estimated to be 470 persons by 2015. This is considered to be a conservative growth rate as compared to that which was experienced between 2002-2006.'

The total housing stock based on Small Area Population Statistics (S.A.P.S) was 519 housing units of this 421 were occupied and 98 were unoccupied. Based on an average household size of 2.97 persons per occupied house, this had the potential to yield a population horizon of 1,250 persons for 2009.

The Settlement Strategy as per the Draft County Development Plan 2005-2105 has placed Craughwell within Tier 4 of the Settlement Hierarchy - Local Services Centres and has allocate a total household allocation of 500 housing units over the CDP period. Based on an average household size of 2.97 persons, Craughwell has the capacity to grow by an estimated 1,485 persons over the plan period. Combining S.A.P.S housing figures and housing

allocation as per the Settlement Strategy Craughwell has the potential to provide a total housing capacity of 921 housing units or a population horizon of 2,735 persons by 2015.

The total number of dwellings that could be developed on the undeveloped lands within the Development Boundary of the Draft Plan is estimated to be 981 dwellings. This is based on the Density Guidelines and Potential Development Yield as per Table 5a of the Draft Plan. This is approximately twice the housing allocation for Craughwell under the 2009-2015 CDP and has a potential population horizon of 2,914 persons by 2015.

The proposed public sewerage scheme has design capacity for 3,500 persons over the following 20 years.

2. Draft LAP will be screened for Appropriate Assessment under the Habitats Directive 92 / 43 / EEC before it is adopted by the Elected Members. This position is contrary to that established by Circular Letter SEA 1/08 & NPWS 1/08

Section 14.3 of the Draft Plan outlines the legislative background and screening process regarding the undertaken of an Appropriate Assessment on land use Plans.

S1: Screening/Test of Significance – the process which identifies that likely impacts upon a Natura 2000 Site, either alone or in combination with other projects or plans, and considers whether these impacts are likely to be significant.

S2: Appropriate Assessment- the consideration of the impact of the project or plan on the integrity of the Natura 2000 Site, either alone or in combination with other projects or plans to the site's structure and function and its conservation objectives. Additionally, where there are adverse impacts, an assessment of the potential mitigation of those impacts

S3: Assessment of Alternative Solutions- the process which examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the Natura 2000 site; and

S4: Assessment where Adverse Impacts Remain- an assessment of compensatory measures where, in the light of an assessment of Imperative Reasons of Overriding Public Interest (IROPI), it is deemed that the project or plan should proceed.

Under the Habitats Directive, an Appropriate Assessment (AA) must be carried out before the Plan is finalised. There is no stipulation at EU or National level that an AA must be carried out when the Plan is initiated. Whilst the PA considers that this would be best practice the carrying out of an Appropriate Screening/Test of Significance during the Draft Plan preparation process which would comply with the statutory requirements as currently in place.

Preliminary screening has been undertaken in relation to the Draft Craughwell LAP, given the distance of the Plan Area from the listed designated sites and the fact that an AA has been undertaken as part of the new public sewerage scheme under Part 8, it was considered that there is unlikely to be significant effects.

The following is a description of the conclusion taken from the Appropriate Assessment that was performed in relation to the Public Sewerage Scheme 2007-

'It is predicted that the construction and operation of the proposed Craughwell Wastewater Treatment Plant will not have a significant impact on the Rahasane Turlough cSAC/SPA. All construction phase impacts can be reduced down to an imperceptible level with suitable mitigation measures and it is expected that the plant will have a moderate positive impact on the cSAC during the operational phase as it will replace diffuse sources of pollution such as septic tanks with a modern water treatment plant with tertiary level treatment'.

In relation to the provision of the public sewerage scheme the PA consider that amendments be made to the text within S. 8.1.1 Water Services (p.31 of Draft Plan) to read as follows:

*~~If this development is permitted, it is envisaged that~~ **Subject to Departmental approval**, construction of the scheme will **may** start in late 2009 **2010** ~~and be completed~~ **with completion** ~~by the end of 2010~~ **in late 2011**.*

~~Development will be restricted in the area until a suitable wastewater treatment plant is in place'.~~

No new significant development will be permitted in the area until such time as the WWTP has been substantially completed

In relation to the Draft Craughwell LAP- the PA will continue to undertake continuous screening during the plan making process in order to fully comply with the requirements under the Habitats Directive. This screening will be based on any ecological information available to GCC and on an adequate description of the Plan and its likely environmental impacts. This should also take into account any policies that will set the terms for future development.

The Planning Authority has been in contact with the National Parks and Wildlife Service to obtain the conservation objectives for the Natura 2000 sites including Rahasane Turlough and the Galway Bay Inner Complex. Appropriate Assessment of impact of the Craughwell Draft Plan as set out in Article 6 of the EU Habitats Directive is only possible or meaningful if conducted in a manner that evaluates the potential impact of the Plan policies and objectives against the conservation objectives established by the competent authorities for the designated sites. To date GCC has only received the Qualifying Interests regarding SPA's from the NPWS, we still await information regarding SAC's. The PA has not been able to obtain this information and until such time as it is available from the competent authority – NPWS, the planning authority is not able to proceed.

The principal trigger for an Appropriate Assessment (Stage 2) would be if the Draft Craughwell LAP were likely to have significant effects on a Natura 2000 site. SACs and SPAs are Natura 2000 sites.

In the event of having to undertake an AA this process will inform all sections of the Draft Craughwell LAP, and all its policies and objectives, and will amend the content and detail of the Plan, as necessary. Any mitigation measures arising from an AA will also be incorporated into the Plan. A final statement on whether or not the Plan, on its own or in combination with other plans and projects, may affect the integrity of a Natura 2000 site, will also be incorporated into the Plan prior to adoption of the Plan.

Minutes of Meeting held on 25th May 2009

There are no Natura 2000 sites within the LAP boundary – the nearest sites include the Rahasane Tourlough and the Galway Bay Inner/Complex which are both SAC's and SPA's. The LAP boundary is situated 825m from the Rahasane Tourlough and 17km from the Galway Bay Inner/Complex. It is considered that both sites are the only 2 Natura 2000 sites which may be subject to negative impacts as a result of inappropriate development in the Craughwell LAP area. Any mitigating measures or measures proposed to avoid impacts on Natura 2000 Sites will be incorporated into the policy or detail of the Draft Craughwell LAP before finalisation.

The CDP 2009-2015 continues to adopt the precautionary principle for designated and non-designated wildlife habitats and contains a number of policies and objectives throughout the Plan that will act as mitigating measures to prevent effects on European Sites.

The Draft Craughwell LAP is subordinate to the CDP and its policies and objectives shall not conflict with those contained within the CDP especially those in relation to mitigating measures in relation to European Sites, Water Protection and Waste Water.

A number of Policies (Policy EH4) and Objectives (Objective EH4.1; EH4.7 and EH5.1) are contained within **S. 14: Strategy** of the Draft Plan in relation to nature conservation.

The PA considers that a number of new policies/objectives be included within S.14 in relation to the protection of the natural heritage.

Include the following new Policies to read as follows;

Policy EH4.1: The Local Authority shall seek to comply with the Habitats Directive and Natura 2000 recommendations, including the protection of fisheries habitats.

Policy EH4.2: No projects giving rise to significant adverse direct, indirect or secondary impact on Natura 2000 sites arising from their size or scale, land take, proximity, resource requirements, emissions of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this Plan (either individually or in combination with other plans or projects).

Policy EH4.3: It shall be the policy of GCC to ensure that development within the Plan Area and the provision of services take into account the relevant Management Plans (if any) for SAC's and SPA's in the area.

Policy EH4.4: Consult the Department of the Environment Heritage and Local Government in relation to proposed developments adjoining designated conservation sites.

Include the following new Objectives to read as follows:

Objective EH4.11: Promote the conservation of biodiversity of designated areas, while allowing for appropriate development, access and recreational activity.

Refer also to S. 13 Development Management Standards and Guidelines –

S.13.9.3 Designated Environmental Sites page 75 currently states that:

'Screening for AA and/or Appropriate Assessment will be required with all applications where it is considered that the proposed development may impact (directly or indirectly) or, in combination with other projects, on a Natura 2000 designated site i.e. a Special Area of Conservation (SAC) or a Special Protection Area (SPA), to inform decision making. The need for an AA should be discussed with the Planning Section prior to the submission of an application. The AA shall be carried out in accordance with Article 6 of the Habitats Directive and Section 18 of the EU Communities (Natural Habitats) Regulations 1997 and shall identify and evaluate the direct and indirect effects, which development would be likely to have upon the designated site.'

The PA considers that a new paragraph be included within the Draft Plan in relation to **Flood Risk Management and Assessment** in order to provide more guidance within the Plan in relation to flood risk management and assessment.

Include a new paragraph within S.10.4 to read as follows:

Flooding is generally a natural process and can happen at any time in a wide variety of locations. It constitutes a temporary covering of land by water and presents a risk only when people and human assets are present in an area which floods. Different types of flooding include river flooding, coastal flooding, poor surface water drainage and malfunctioning of infrastructure. Rivers with a low gradient are very susceptible to flooding at any time of the year. The Water Framework Directive (WFD) and the Water Policy Regulations allocate the responsibility for the implementation of the WFD to the EPA, LA's and relevant Public Authorities. GCC shall implement the provisions of The Planning System and Flood Risk Management Draft Guidelines 2008 in the carrying out of their development management functions.

Flood Management Strategy

GCC shall adopt a comprehensive risk-based planning approach to flood management to prevent or minimise future flood events. In accordance with the Draft Ministerial Guidelines on the Planning System and Flood Risk Management, the avoidance of development in areas where flood risk had been identified shall be the primary response. Proposals for mitigation and management of flood risk will only be considered where avoidance is not possible and where development can be clearly justified with the Guidelines Justification Test. Flood management should have regard to surface water, groundwater, drinking water supply, flood plains and water and wastewater infrastructure. It is the strategy of the Council to manage flood risk at source with appropriate consideration to the catchment area of the water source.

Include the following new Policies to read as follows:

Policy EH4.5: It is the policy of the Council to restrict inappropriate development in areas at risk of flooding

Policy EH4.6: It is the policy of the Council to require all significant developments proposed in the settlements identified in the County Development Strategy to incorporate SuDS as part of the development proposals where appropriate.

Include the following new Objectives to read as follows:

Objective EH4.12: The Council shall implement the provisions of The Planning System and Flood Risk Management Draft Guidelines 2008 in the carrying out of their development management function. The avoidance of development in areas where flood risk has been identified shall be the primary response of the PA. Development proposals which include proposals for mitigation and management of flood risk will only be considered where avoidance is not possible and where development can be clearly justified with the Guidelines 'Justification Test'.

Objective EH2.13: Adopt appropriate zoning of lands and restriction of use in areas of the Plan area that are liable to flooding to avoid increased risk of flooding of the lands either within or adjoining the zoned areas.

3. The Draft LAP should be revised in order to make appropriate reference to "The Provision of Schools and the Planning System A Code of Practice for Planning Authorities, the Dept of Education & Science & DEHLG" (July 2008).

The PA notes this omission and will include reference to the above within S. 13.6.1 Schools (page 65) of the Draft Plan.

4. Nature Conservation - Galway County Council is in the process of undertaking Appropriate Assessment (AA) screening for the LAP as per section 14.3.1 of the

Local Area Plan, and the Department will assess the provision of this screening or full AA report for further comment, as necessary.

The PA has addressed this under Issue No. 2 above.

5. It is considered that some of the text in Section 10 of the Draft Plan should be clarified and strengthened.

The PA shall consider the inclusion of the following text within S.10.1.1 Context – Include as paragraph no. 2.

It is increasingly recognized that culture has an essential role to play in the economic, social and physical development of an area. It can contribute to local distinctiveness and towards cultural tourism, help create a sense of place, humanize the built environment and encourage residents to take a greater pride in their locality. GCC is committed to supporting the development of arts and culture activities within towns and villages throughout the county.

Amend typographical error in John Hutson-Huston

It is recommended that the text at Objective EH2.11 be reviewed and revised.

Amend the text within Objective EH2.11 to read as follows

"Encourage the rehabilitation, restoration, re-use or change of use as appropriate of older buildings of architectural heritage merit in the village in order to maintain a viable future for those structures, and similarly encourage the rehabilitation, restoration, re-use or change of use its protected structures."

6. It is recommended that the text at **Objective EH2.14** and **Objective EH2.20** might be combined, as both deal with 'street pattern'.

Combine both Objective EH2.14 & EH2.20 to read as follows:

Objective EH2.14: Respect and maintain the historic street pattern of Craughwell, spaces and relationships which contribute to the setting of the proposed ACA in order to enhance its visual character, through the control of inappropriate development.

Amend number within this Section.

7. It is recommended that the **text in Objective EH2.19** might be reviewed as it appear to contain a typographical error and combined with that in **Objective EH2.22** in order to set out a coherent approach to the preservation of the character of the ACA rather than specifically protecting individual structures within it.

Amend and combine Objectives EH2.19 & EH2.22 to read as follows:

Objective EH2.19: Protect **Preserve, the character of the Craughwell ACA through encouraging the design, location and layout of new development and the alteration of existing structures in a manner which enhances that character.**

Recommendation

1. Include a new Section – Section 2.4 Existing and Future Population and Demographic Trends within Craughwell Draft LAP. Include new preamble within S.2.4 as indicated above.
2. Under the Habitats Directive, an Appropriate Assessment (AA) must be carried out before the Plan is finalised. There is no stipulation at EU or National level that an AA must be carried out when the Plan is initiated. Whilst the PA considers that this would be best practice the carrying out of an Appropriate Screening/Test of Significance

during the Draft Plan preparation process which would comply with the statutory requirements as currently in place.

Preliminary screening has been undertaken in relation to the Craughwell Draft Plan, given the distance of the Plan Area from the listed designated sites and the fact that an AA has been undertaken as part of the new public sewerage scheme under Part 8, it was considered that there is unlikely to be significant effects.

In relation to the provision of the public sewerage scheme the PA consider that amendments be made to the text within **S. 8.1.1 Water Services (p.31 of Draft Plan)** to read as follows:

*~~If this development is permitted, it is envisaged that~~ **Subject to Departmental approval, construction of the scheme will may start in late 2009 2010 and be completed with completion by the end of 2010 in late 2011.** Development will be restricted in the area until a suitable wastewater treatment plant is in place'.*

No new significant development will be permitted in the area until such time as the WWTP has been substantially completed

In relation to the Draft Craughwell LAP- the PA will continue to undertake continuous screening during the plan making process in order to fully comply with the requirements under the Habitats Directive. This screening will be based on any ecological information available to GCC and on an adequate description of the Plan and its likely environmental impacts. This should also take into account any policies that will set the terms for future development.

Appropriate Assessment of impact of the Draft Craughwell LAP as set out in Article 6 of the EU Habitats Directive is only possible or meaningful if conducted in a manner that evaluates the potential impact of the Plan policies and objectives against the conservation objectives established by the competent authorities for the designated sites. To date GCC has only received the Qualifying Interests regarding SPA's from the NPWS, we still await information regarding SAC's. The PA has not been able to obtain this information and until such time as it is available from the competent authority – NPWS, the planning authority is not able to proceed.

The principal trigger for an Appropriate Assessment (Stage 2) would be if the Draft Craughwell LAP were likely to have significant effects on a Natura 2000 site. SACs and SPAs are Natura 2000 sites.

In the event of having to undertake an AA this process will inform all sections of the Draft Craughwell LAP, and all its policies and objectives, and will amend the content and detail of the Plan, as necessary. Any mitigation measures arising from an AA will also be incorporated into the Plan. A final statement on whether or not the Plan, on its own or in combination with other plans and projects, may affect the integrity of a Natura 2000 site, will also be incorporated into the Plan prior to adoption of the Plan.

The Draft Craughwell LAP is subordinate to the CDP and its policies and objectives shall not conflict with those contained within the CDP especially those in relation to mitigating measures in relation to European Sites, Water Protection and Waste Water.

Include new policies/objectives be included within S.14 in relation to the protection of the natural heritage to read as follows:

Policy EH4.1: The Local Authority shall seek to comply with the Habitats Directive and Natura 2000 recommendations, including the protection of fisheries habitats.

Policy EH4.2: No projects giving rise to significant adverse direct, indirect or secondary impact on Natura 2000 sites arising from their size or scale, land take, proximity, resource requirements, emissions of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this Plan (either individually or in combination with other plans or projects).

Policy EH4.3: It shall be the policy of GCC to ensure that development within the Plan Area and the provision of services take into account the relevant Management Plans (if any) for SAC's and SPA's in the area.

Policy EH4.4: Consult the Department of the Environment Heritage and Local Government in relation to proposed developments adjoining designated conservation sites.

Include the following new Objectives to read as follows:

Objective EH4.11: Promote the conservation of biodiversity of designated areas, while allowing for appropriate development, access and recreational activity.

On the proposal of Cllr Willers and seconded by Cllr Finnerty it was agreed to accept the recommendations in the Manager's Report and include the above listed Policies EH4.1 to EH 4.4 and Objective EH 4.11

Refer also to S. 13 Development Management Standards and Guidelines – S.13.9.3 Designated Environmental Sites page 75.

The PA considers that a new paragraph be included within the Draft Plan in relation to **Flood Risk Management and Assessment** in order to provide more guidance within the Plan in relation to flood risk management and assessment

Include a new paragraph within S.10.4 to read as follows:

Flooding is generally a natural process and can happen at any time in a wide variety of locations. It constitutes a temporary covering of land by water and presents a risk only when people and human assets are present in an area which floods. Different types of flooding include river flooding, coastal flooding, poor surface water drainage and malfunctioning of infrastructure. Rivers with a low gradient are very susceptible to flooding at any time of the year. The Water Framework Directive (WFD) and the Water Policy Regulations allocate the responsibility for the implementation of the WFD to the EPA, LA's and relevant Public Authorities. GCC shall implement the provisions of The Planning System and Flood Risk Management Draft Guidelines 2008 in the carrying out of their development management functions.

Flood Management Strategy

GCC shall adopt a comprehensive risk-based planning approach to flood management to prevent or minimise future flood events. In accordance with the Draft Ministerial Guidelines on the Planning System and Flood Risk Management, the avoidance of development in areas where flood risk had been identified shall be the primary response. Proposals for mitigation and management of flood risk will only be considered where avoidance is not possible and where development can be clearly justified with the Guidelines Justification Test. Flood management should have regard to surface water, groundwater, drinking water supply, flood plains and water

and wastewater infrastructure. It is the strategy of the Council to manage flood risk at source with appropriate consideration to the catchment area of the water source.

Include the following new Policies to read as follows:

Policy EH4.5: It is the policy of the Council to restrict inappropriate development in areas at risk of flooding

Policy EH4.6: It is the policy of the Council to require all significant developments proposed in the settlements identified in the County Development Strategy to incorporate SuDS as part of the development proposals where appropriate.

Include the following new Objectives to read as follows:

Objective EH4.12: The Council shall implement the provisions of The Planning System and Flood Risk Management Draft Guidelines 2008 in the carrying out of their development management function. The avoidance of development in areas where flood risk has been identified shall be the primary response of the PA. Development proposals which include proposals for mitigation and management of flood risk will only be considered where avoidance is not possible and where development can be clearly justified with the Guidelines 'Justification Test'.

Objective EH2.13: Adopt appropriate zoning of lands and restriction of use in areas of the Plan area that are liable to flooding to avoid increased risk of flooding of the lands either within or adjoining the zoned areas.

On the proposal of Cllr Willers and seconded by Cllr D. Connolly it was agreed to accept the recommendation in the Manager's Report to include a new paragraph within Section 10.4 and include new Policies EH4.5 and 4.6 and Objectives EH 4.12 and EH 4.13 as outlined above.

3. Include reference to "The Provision of Schools and the Planning System A Code of Practice for Planning Authorities, the Dept of Education & Science & DEHLG" (July 2008) within S. 13.6.1 Schools (page 65) of the Draft Plan.
4. The PA has addressed this under Issue No. 2 above.
5. The PA shall consider the inclusion of the following text within S.10.1.1 Context – Include as paragraph no. 2.

It is increasingly recognized that culture has an essential role to play in the economic, social and physical development of an area. It can contribute to local distinctiveness and towards cultural tourism, help create a sense of place, humanize the built environment and encourage residents to take a greater pride in their locality. GCC is committed to supporting the development of arts and culture activities within towns and villages throughout the county.

Amend typographical error in John ~~Hutson~~-Huston

It is recommended that the text at Objective EH2.11 be reviewed and revised.

Amend the text within Objective EH2.11 to read as follows

"Encourage the rehabilitation, restoration, re-use or change of use as appropriate of older buildings of architectural heritage merit in the village in order to maintain a viable future for those structures, and similarly encourage the rehabilitation, restoration, re-use or change of use its protected structures."

6. Combine both Objective EH2.14 & EH2.20 to read as follows:

Objective EH2.14: Respect and maintain the historic street pattern of Craughwell, spaces and relationships which contribute to the setting of the proposed ACA in order to enhance its visual character, through the control of inappropriate development.

Amend numbering within this Section.

7. Amend and combine Objectives EH2.19 & EH2.22 to read as follows:

Objective EH2.19: Protect Preserve, the character of the Craughwell ACA through encouraging the design, location and layout of new development and the alteration of existing structures in a manner which enhances that character.

On the proposal of Cllr Willers and seconded by Cllr Hynes it was agreed to accept the recommendations in the Manager's Report

7. **Mssrs. Collie Gaughan, Sean Heavey & Leo O' Sullivan, Block 1 G.F.S.C. Moneenageisha Road, Galway.**

Synopsis.

This submission requests that the submission lands as outline on the enclosed Map 01 be included within the Draft Plan. The submission requests that these lands be zoned as Inner Village Area. According to the contents of this submission the most appropriate method of designating a suitable development envelope for the village should be based, as accepted in part in the Draft Plan, on a concentric development pattern emanating from the village core.

1. The submission states that the west side of the village is severely curtailed, leaving a village form that is not concentric and focused on the village core. The submission notes that there is a significant weakness in the current Draft Plan is that the proposed walkbands (shown on Map B) have not allowed to expand to the west of the railway line, except in the immediate area around the railway station. This leaves a large area of land that is centrally located relative to the village centre not identified for any development. This is illustrated on Map 02 of this submission, which shows the currently proposed village form and the 'lob-sided' nature of the village centre and proposed Plan boundary.
2. The submission states that the Development Areas Map does not represent a coherent and sustainable approach to the future development of Craughwell and has generally used the Galway-Dublin railway line as an artificial outer boundary to the west of the Plan area. Lands to the east of the railway line are predominately zoned for development, while lands to the west of the line are only designated for development to the south of the river. The submission considers that this is not considered to represent a coherent urban form and will reduce the sustainable development benefits of developing lands close to the village core and railway station.
3. The submission lands are considered to be strategically located adjacent to the existing 'Village Core' and represent the most appropriate location to accommodate the expansion and future development of the 'Inner Village'. They are located within close proximity to the railway station and permission already exists for a new link road access from an adjacent development across the Craughwell River. The submission notes that the Draft Plan has already identified some lands further south and west of the railway line for development and in this respect the subject lands are closer to the village centre. Significant opportunities also exist to improve access to the main street and towards the national school to the north. The submission also notes that the lands to the east of the 'Village Core' have already been subject to substantial development and as such the scope to cater for additional development to the east is somewhat limited.

Response

1. Village form that is not concentric and focused on the village core.

Craughwell village is predominantly linear in form and centres on the N6.

Development within Craughwell village has traditionally followed the north-south alignment of the main Galway-Dublin Road (N6).

The Craughwell / Dunkellin River traverse the south of the plan area and the west of the plan area is bounded by the rail line. The plan area is relatively low lying with a maximum elevation of 34m Ordnance Datum (OD) (see Appendix A as per Draft Plan).

- The N6 provides access to adjacent lands but also acts as an environmental and social barrier in terms of noise and safety.
- The rail line has acted as a constraint to the development of lands to the west of the N6.
- The flooding has also acted as a physical constraint in the consolidation of the village. This segregation is evident in the form of the village.

The main aims for the development of Craughwell is to provide a mixed use zoning framework for the Plan Area, to direct development in a manner that ensures complimentary uses, consolidates development in the village centre, enhances the existing landscape setting, character and identity of the village and complies with the statutory requirements in the PDA 2000 and to direct development into locations that best suit the development areas and density provisions. The Plan combines mixed-use **zoning and development areas** to allow the village to develop in a more organic and integrated manner and to follow the sequential approach of development from the Village Core out to the Outer Village.

Four Development Areas are identified in the LAP:

- Village Core
- Inner Village
- Outer Village
- Flood Area

The identification of these areas during the plan making process was based on the existing topography/contour lines, physical and man made barriers, flood area along by the course of the Craughwell/Dunkellin River as well as the current village context and layout. All of which, do not lend to the formation of a concentric village form as suggested in this submission. The Draft Plan identified these areas in order to enable new development to assimilate into the existing context and to avoid ad-hoc and inappropriate development.

The Land Use Strategy as outlined in the Draft Plan provides considerable scope for new development within the Plan Area. The development potential of the existing undeveloped lands in the present Development Boundary represents approximately twice the house construction allocation allowed for Craughwell in the CDP 2009-2015. Given the availability of this substantial amount of undeveloped lands, in excess of that required for the 6 year period, future development should be strategically directed to best achieve orderly development and the sequential approach to development as outlined within the Draft Plan.

The submission lands which consist of 21.87 acres (8.85 h.a.) are quite sizeable and are located west of the railway line and outside the Development Boundary of the Draft Plan. The shape of this land segment is longitudinal and on its own would not help create a concentric shape to the Development Boundary for the Plan Area. The access to these lands is via the Grenage road which is substandard in width and in alignment; sight distances along this road are also substandard. The existing railway bridge (Bridge 263) which is located before the only entrance to this site is also very narrow and low in height.

The submission requests that the lands be included within the Plan Boundary and be zoned as **Inner Village Area**. The submission notes that planning permission has already been granted by GCC on lands west of the railway line and directly south of this site and the Craughwell/Dunkellin River. Provision is also made within the planning application for a new road bridge over the river to access the subject lands to the north and to provide alternative access to the village centre. This road which should be continued though the submission lands and extend northwards, will provide an alternative local access route for the village to avoid

the busy N6 roadway even on completion of the upgrade to it. The submission also notes that the re-opening of the railway line in 2009, the N6 level crossing will be closed from time to time, effectively stopping all traffic in the village.

The Planning Authority considers it inappropriate to include and zone the submission lands for the following reasons:

- The consolidation of the village and the prevention of further unsustainable ribbon development is a key aim of the LAP and forms the basis for the land use zones and areas identified in the LAP. Proposals that seek to extend the plan boundary will have the effect of undermining the consolidation of the village, with resultant impacts in terms of ribbon development, sprawl, visual, landscape and environmental impacts, inefficient use of development land and infrastructure, etc.
- No new significant development will be permitted until such time as the public WWTP has been substantially completed. Refer to Section 8.1.1 Water Services Wastewater Treatment and Disposal.
- Tracts of undeveloped land have been identified during the plan making process- these land are located west of the Main Street, the North-east of the LAP area and around the rail station area.
- The development potential of the undeveloped lands in the Draft Plan area represents approximately twice the house construction allocation allowed for Craughwell in the new CDP 2009-2015. This development potential has been based on the Density Guidelines and Potential Development Yield as shown within Table 5a on Page 18 of the Draft Plan. By expanding the Development Plan Boundary would result in an even greater potential development yield than is estimated within the Draft Plan and within the CDP 2009-2015.
- In the absence of a certain essential infrastructure including a public sewerage scheme and proper access to these lands the PA considers it inappropriate to include and zone these lands at this time.

2. The submission considers that the Draft Boundary is not considered to represent a coherent urban form and will reduce the sustainable development benefits of developing lands close to the village core and railway station.

The PA notes that the railway line presents a physical barrier to the development of the Village Core to the west of the railway line. The PA also notes there is approximately 55 h.a within the existing Draft Development Boundary that is presently undeveloped. The aim of the Draft Plan is to consolidate the existing village core through infill development, redevelopment of derelict, obsolete and brownfield sites and to develop those lands initially in a sequential manner from the Core outwards.

Objective LU3.2: Encourage sequential development in the Plan Area, from the centre outward, in order to ensure that the higher order facilities and the higher density development are located on the most central lands with the optimum access and the highest level of services.

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The submission requests that the submission lands (approximately 22 acres) be included and zoned as Inner Village Area. The development potential of the existing undeveloped lands in the present Development Boundary represents approximately twice the house construction allocation allowed for Craughwell in the CDP 2009-2015 under the Settlement Strategy. The inclusion of these lands and their zoning as Inner Village would skew these allocations and would be contrary to the policies and objectives of both the CDP 2009-2015 and with the aims of the Draft LAP for Craughwell. Table 5a Density Guidelines and Potential Development Yield already makes provision for 981 housing units within the Plan Area.

The zoning of lands as Inner Village Area close to the railway station is to provide opportunity for higher density development adjacent to public transport nodes which is considered to be in accordance with proper planning and sustainable development.

3. The submission lands are considered to be strategically located adjacent to the existing 'Village Core'. They are located within close proximity to the railway station and permission already exists for a new link road access from an adjacent development across the Craughwell River. Significant opportunities also exist to improve access to the main street and towards the national school to the north.

The PA acknowledges that planning permission has been granted under 07/1922 for a roundabout and road overbridge over the Craughwell/Dunkellin River which when constructed by the developer would provide an alternative means of access into the submission lands. While potential may exist to provide for a future link road northwards though the submission lands and eventually towards Craughwell National School (which is also outside the existing development boundary), the PA considers that the inclusion of such a link road and the inclusion of the submission lands to be premature at this time.

The PA considers it appropriate to acknowledge that provision be made in this Draft Plan to provide for the 'strategic gateway' entrances for such a link road in order to make provision for the long term growth of Craughwell and to ensure that these lands are not cut-off and that their future development potential can be realised.

The PA has identified 2 'strategic gateways':

Map 1: indicative strategic gateway north of the railway crossing to the L4507

Map 2: indicative strategic gateway north of the R347 and the Craughwell/Dunkellin River.

The PA also considers that in order to reserve lands free from development for the future provision of such 'strategic gateways' the Draft Plan should be amended to include a new objective to acknowledge this provision. It is considered appropriate to include a **new objective within S. 4.3 Movement and Transportation Strategy** to read as follows:

Objective TAI.15: *Reserve strategic gateway entrances from existing road network to lands west of the railway line and north of the R347 to accommodate the medium to long term growth of the village as indicated on Map 1 and Map 2 of the Draft Plan.*

Refer to Maps 1&2 of the Draft Plan for indicative location of 'Strategic Gateways'

Recommendation

1. It is considered inappropriate to include and zone the submission lands within the Draft Development Boundary
2. No change to the Draft Development Boundary
3. Include a new Objective within S.4.3 Movement and Transportation Strategy to read as follows

Objective TAI.15: Reserve strategic gateway entrances from existing road network to lands west of the railway line and north of the R347 to accommodate the medium to long term growth of the village as indicated on Map 1 and Map 2 of the Draft Plan.

Refer to Maps 1&2 of the Draft Plan for indicative location of 'Strategic Gateways'

On the proposal of Cllr Regan and seconded by Cllr Fahy it was agreed not to accept the Manager's report but to extend the Plan Boundary and zone the lands the subject of Submission 7 as Inner Village Area.

On the proposal of Cllr Willers and seconded by Cllr McDonagh it was agreed to include Objective TAI.15 within Section 4.3 of the Plan as outlined above.

8. **Mssrs. Patrick Martin & Daragh Rafferty, Grenage, Craughwell, Co Galway.**

Synopsis.

The submission requests that

1. the lands as submitted in the enclosed map and coloured in red be considered as residential (low density) within the Draft Local Area Plan. This land is 400m from the N.S. and is adjacent to the all weather pitch, running track and GAA grounds. The said lands could also be serviced by a footpath to the nearby school and sporting facilities.
2. the lands as submitted in the enclosed map and coloured in blue be considered as recreation and amenity. There are no permanent training grounds within Craughwell village and the submission considers that a 5 acre site is necessary. This land can also be serviced by a footpath to the local school, all weather pitch, running track and GAA grounds and would provide safe pedestrian access, encourage walking and cycling and reduce the need for cars.

Response

1. The Submission Lands are located outside the Draft Development Boundary along the L4501-84 and approximately 1.5 km from the Village centre. This road is poorly aligned, has no public footpaths or public street lighting and has considerable ribbon development.

Lands shaded in red on the enclosed submission map, consists of 13.08 acres and front directly onto the local road. The submission requests that these lands be zoned as low density residential within the Draft Plan.

The PA considers this inappropriate for the following reasons:

- The development potential of the undeveloped lands in the Draft Plan area represents approximately twice the house construction allocation allowed for Craughwell in the new CDP 2009-2015. This development potential has been based on the Density Guidelines and Potential Development Yield as shown within Table 5a on Page 18 of the Draft Plan. By expanding the Development Plan Boundary would result in an

even greater potential development yield than is estimated within the Draft Plan and within the CDP 2009-2015. Given the availability of a substantial amount of undeveloped lands, in excess of that required of the 6 year plan period, future development should be strategically directed to best achieve orderly development and the sequential approach to development as outlined in the Draft Craughwell LAP.

- These lands are a considerable distance outside the Draft Boundary and the zoning of these lands as low residential would not be a logical or sequential zoning manner.
- No new significant development will be permitted until such time as the public WWTP has been substantially completed. Refer to Section 8.1.1 Water Services Wastewater Treatment and Disposal.
- The consolidation of the village and the prevention of further unsustainable ribbon development is a key aim of the LAP and forms the basis for the land use zones and areas identified in the LAP. Proposals that seek to extend the plan boundary will have the effect of undermining the consolidation of the village, with resultant impacts in terms of ribbon development, sprawl, visual, landscape and environmental impacts, inefficient use of development land and infrastructure, etc.
- The L4501-84 is substandard in alignment, has no public footpath or public street lighting. Further residential development along this road would be prejudicial to health and safety.

2. The lands shaded as blue on the enclosed submission map consist of 4.2 acres, has no direct access to the local road and is land locked. The submission requests that this land be zoned as recreation and amenity.

Craughwell National School is located to the east of the submission lands along the L4501-84 and is also outside the Draft Development Boundary. The school site consists of 5 acres – 3 acres of which is leased to the Department of Education and Science for the provision of school buildings and 2 acres is leased to the Craughwell Community Sports Group. Present attendance is 269 pupils with 13 permanent teachers. Present sports facilities include an all weather pitch, 400m running track, tartan track for long jump and playground. The GAA club owns land directly behind the school – the site is approximately 26 acres and currently has a number of pitches, a handball court and dressing rooms. The N.S pupils have direct access from the school grounds (with permission) to these facilities and do not have to walk on the local road.

The local community also attend the facilities within the school grounds for keep fit classes and circuit training.

Both the N.S. and GAA grounds can currently accommodate the community amenity needs. Further improvement on the integration of both facilities would further enhance the sporting amenity offer at these locations without the need to further zone the submission lands for amenity. Connectivity with the village centre is also desirable as there are no walkways to the village and the N6 road lacks both public footpaths and public street lighting between the school and the village.

The PA considers that the existing sporting/amenity facilities are adequate at this time and is unable to justify the zoning of additional lands as amenity given the potential that currently exists within the GAA lands.

Recommendation

1. No change to the Draft Development Boundary. No change to the Draft Plan.
2. No change to the Draft Development Boundary. No change to the Draft Plan.

On the proposal of Cllr Regan and seconded by Cllr D.Connolly it was agreed to accept the recommendation in the Manager's Report.

9. Patrick Martin, Grenage, Craughwell, Co Galway.

This submission requests that

1. the lands as outlined in red in the enclosed map be zoned as Outer Village Development Area within the Draft Craughwell LAP.

The lands in question extend to approximately 25 acres and adjoin the N6, the local N.S., the all weather pitch and the local GAA pitches. The submission also notes that the lands could provide for a possible alternative road route around the village towards the railway station from the N6 junction with the Athenry Road. The submission notes that under the CDP 2009-2015 Craughwell has been allocated 500 housing units as a result of the re-opening of the local railway station. The submission lands would connect the north of the village and the school/amenity area to the railway station and are considered ideal for outer village development.

Response

The submission lands which consist of 27.6 acres are located west of the railway line and outside the Draft Development Plan Boundary. The lands have direct road access onto the N6 immediately north of the Railway crossing where the 100km/h applies.

The PA shall be guided by the NRA official policy in relation to access to national roads and developments along such roads as set out in NRA publications Development Control Advice and Guidelines, Policy and Planning Framework for Roads and by the Authority's Policy Statement on Development Management and Access to National Roads.

While the submission notes that the lands could provide for a possible alternative road route around the village from the station to the L4501-84 this would be dependent on the inclusion and zoning of all submission lands west of the railway line, north of the Grenage Road and would be developer driven. The Council is committed to the development of lands under planning application 07/1922 which includes the provision of a roundabout and road overbridge crossing the Craughwell/Dunkellin River. The site layout map under planning application 07/1922 is contained within the Draft Plan boundary and is zoned as Outer Village Area. Development of this site is presently at a standstill – 4 houses have been completed, the roundabout consists of a mound of clay, pipes have been laid for sewerage and electrical points.

The inclusion and zoning of these lands as Outer Village Area would not be considered appropriate for the following reasons:

- No new significant development will be permitted until such time as the public WWTP has been substantially completed. Refer to Section 8.1.1 Water Services Wastewater Treatment and Disposal.
- The development potential of the undeveloped lands in the Draft Plan area represents approximately twice the house construction allocation allowed for Craughwell in the new CDP 2009-2015. This development potential has been based on the Density Guidelines and Potential Development Yield as shown within Table 5a on Page 18 of the Draft Plan. By expanding the Development Plan Boundary would result in an even greater potential development yield than is estimated within the Draft Plan and within the CDP 2009-2015. Given the availability of a substantial amount of undeveloped lands, in excess of that required of the 6 year plan period, future development should be strategically directed to best achieve orderly development and the sequential approach to development as outlined in the Draft Craughwell LAP.
- The consolidation of the village and the prevention of further unsustainable ribbon development is a key aim of the LAP and forms the basis for the land use zones and areas identified in the LAP. Proposals that seek to extend the plan boundary will have the effect of undermining the consolidation of the village, with resultant impacts

in terms of ribbon development, sprawl, visual, landscape and environmental impacts, inefficient use of development land and infrastructure, etc.

- As a general policy, the location of new means of access onto the existing N6 shall not be permitted except in areas where a speed limit of 50-60 km/h applies, or in the case of infilling, in the existing built-up areas. This is to ensure the protection of the carrying capacity, safety and operational efficiency of the national road network, pending the opening of the M6 and subsequent downgrading of the existing N6 through Craughwell. The Planning Authority shall in the first instance, seek to channel traffic from new development onto existing local roads and in this way use established access points to gain entry onto national roads. In exceptional circumstances, direct access maybe considered, in consultation with the NRA Dept of Environment, Heritage and Local Government and other relevant stakeholders on a case by case basis, onto national routes (non- motorways) to accommodate strategic infrastructure or regional significant development. Refer to new Policy within **Policy TA2** within S.4.3 of the Draft Craughwell LAP

While potential may exist to provide for a future link road northwards though the submission lands and eventually towards Craughwell National School (which is also outside the existing development boundary), the PA considers that the inclusion of such a link road and the inclusion of the submission lands to be premature at this time.

The PA considers it appropriate to acknowledge that provision be made in this Draft Plan to provide for the 'strategic gateway' entrances for such a link road in order to make provision for the long term growth of Craughwell and to ensure that these lands are not cut-off and that their future development potential can be realised.

The PA has identified 2 'strategic gateways':

Map 1: indicative strategic gateway north of the railway crossing to the L4501

Map 2: indicative strategic gateway north of the R347 and the Craughwell/Dunkellin River.

The PA also considers that in order to reserve lands free from development for the future provision of such 'strategic gateways' the Draft Plan should be amended to include a new objective to acknowledge this provision.

It is considered appropriate to include a **new objective within S. 4.3 Movement and Transportation Strategy** to read as follows:

Objective TA1.15: *Reserve 'strategic gateway' entrances from existing road network to lands west of the railway line and north of the R347 to accommodate the medium to long term growth of the village as indicated on Map 1 and Map 2 of the Draft Plan.*

Refer to Maps 1&2 of the Draft Plan for indicative location of 'Strategic Gateways'

Recommendation

1. It is considered inappropriate to include and zone the submission lands within the Draft Development Boundary. No change to the Draft Development Boundary Include a new Objective within S.4.3 Movement and Transportation Strategy to read as follows

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Objective TAI.15: *Reserve 'strategic gateway' entrances from existing road network to lands west of the railway line and north of the R347 to accommodate the medium to long term growth of the village as indicated on Map1 and Map 2 of the Draft Plan.*

Refer to Maps 1&2 of the Draft Plan for indicative location of 'Strategic Gateways'

Include a new Policy – Policy **Policy TA2** within S.4.3 of the Draft Craughwell LAP.

The Mayor pointed out that a strategic corridor for a possible alternative road route for the village could be provided that would link the amenity areas to the village. Mr Ridge stated that the development potential of the undeveloped lands in the Draft Craughwell Plan area can accommodate twice the house construction allocation allowed for Craughwell in the County Development Plan 2009-2015. By adding a new area for development west of the railway will cause the village to become disconnected, create sprawl and will result in an inefficient use of infrastructure.

It was proposed by Cllr D. Connolly and seconded by Comh O'Tuairisg to accept the recommendation in the Manager's Report.

It was proposed by Cllr Willers and seconded by Cllr Feeney not to accept the recommendation in the Manager's Report but to extend the plan boundary and zone the lands the subject of Submission 9 as Outer Village Development Area

A vote was taken on Cllr Willers proposal and the result of the vote was as follows:

AR SON Cllr Canney, Cllr Conneely, Cllr M. Connolly, Cllr Cuddy, Cllr Fahy, Cllr Feeney, Cllr Hynes, Cllr. Kyne, Cllr Maher, Cllr McDonagh, Cllr. Regan, Cllr Reilly, Cllr Finnerty, Cllr S. Walsh, Cllr Willers (15)

IN AGHAIDH: Cllr D Connolly, Cllr Joyce, Comh. O'Cuaig, Comh O Tuairisg Cllr Welby, (5)

*GAN VOTÁIL: Cllr Mannion, Comh Ní Fhartharta (2)
The Mayor declared Cllr. Willer's proposal carried.*

A vote was taken on Cllr. D. Connolly's proposal and the result of the vote was as follows:

*AR SON: Cllr D Connolly, Cllr Joyce, Comh. O'Cuaig, Comh O Tuairisg Cllr Welby, (5)
IN AGHAIDH: Cllr Canney, Cllr Conneely, Cllr Cuddy, Cllr Fahy, Cllr Feeney, Cllr Hynes, Cllr. Kyne, Cllr Maher, Cllr McDonagh, Cllr. Regan, Cllr Reilly, Cllr Finnerty, Cllr S. Walsh, Cllr Willers (14)*

GAN VOTÁIL: Cllr Hoade Cllr Mannion, Comh Ní Fhartharta (3)

The Mayor declared Cllr.D.Connolly's proposal lost.

10. Michael Tobin, Craughwell Athletic Club, Craughwell, Co. Galway

This submission requests that provision be made within the Draft Craughwell LAP 2009 - 2015 for a site to develop training facilities for the Craughwell Athletics Club. Membership

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has grown in recent years and presently there are 220 juvenile members and over 160 adult members. Juvenile training sessions are mostly based at Craughwell N.S., where the club rents out an astro-turf pitch.

The submission requests that the Draft Plan accommodates the following facilities:

- an indoor training facility which could also incorporate a members gym
- an off-road running area, e.g. park or woodland

The submission states that the Club would never be in a position to fund the purchase of a site in addition to its development. Therefore the Club is requesting that GCC help the Club obtain a site in the vicinity of Craughwell – proximity to the school would be an advantage for dropping off to either the school or a future indoor facility.

Two land owners expressed interest in providing land to the Club:

- (a) a 5 acre site in Crinnage, Craughwell. This site is located approximately 500m from the N.S. along L___ The site is offered free but on the basis of getting permission for a proposed housing development on adjacent land
- (b) a 2 acre site in Shanbally, Craughwell. The site is located approximately 450 meters from the N.S. Four farmers share a dirt access road into the site on the condition that the Club would pay for the development of the road, one of the farmers is opposed to any such development.

The submission requests that the lands at (a) above be included in the Draft LAP as there is no other potential opportunity for the Athletic Club to be given a site for free.

Response

1. The Submission Lands are located outside the Draft Development Boundary along the L4501-84 and approximately 1.5 km from the Village centre. This road is poorly aligned, has no public footpaths or public street lighting and has considerable ribbon development.

Craughwell National School is located to the east of the submission lands along the L4501-84 and is also outside the Draft Development Boundary. The school site consists of 5 acres – 3 acres of which is leased to the Department of Education and Science for the provision of school buildings and 2 acres is leased to the Craughwell Community Sports Group. Present attendance is 269 pupils with 13 permanent teachers. Present sports facilities include an all weather pitch, 400m running track, tartan track for long jump and playground. The GAA club owns land directly behind the school – the site is approximately 26 acres and currently has a number of pitches, a handball court and dressing rooms. The N.S pupils have direct access from the school grounds (with permission) to these facilities and do not have to walk on the local road.

The local community also attend the facilities within the school grounds for keep fit classes and circuit training.

Both the N.S. and GAA grounds can currently accommodate the community amenity needs. Further improvement on the integration of both facilities would further enhance the sporting amenity offer at these locations without the need to further zone the submission lands for amenity in order to facilitate the provision of an indoor training facility/gym and an off-road distance running area. Connectivity with the village centre is also desirable as there are no walkways to the village and the N6 road lacks both public footpaths and public street lighting between the school and the village.

The PA considers that the existing sporting/amenity facilities are adequate at this time and is unable to justify the zoning of additional lands as amenity given the potential that currently exists within the GAA lands.

The development potential of the undeveloped lands in the Draft Plan area represents approximately twice the house construction allocation allowed for Craughwell in the new

CDP 2009-2015. This development potential has been based on the Density Guidelines and Potential Development Yield as shown within Table 5a on Page 18 of the Draft Plan. By expanding the Development Plan Boundary would result in an even greater potential development yield than is estimated within the Draft Plan and within the CDP 2009-2015.

Recommendation

Not to include the submission lands. No change to Draft Boundary. No change to the Draft Plan.

On the proposal of Cllr Regan and seconded by Cllr Willers it was agreed to accept the recommendation in the Manager's Report

11. Mary Colohan, Higher Executive Officer, Planning & Building Unit, Department of Education and Science, Portlaoise Road, Tullamore, Co. Offaly.

Synopsis

1. The submission provides information regarding the educational infrastructural requirements as well as links to their website regarding information on their Technical Guidance Document -025 - Identification and Suitability of Sites for Primary Schools. The submission also wishes to draw attention to the recently published (July 2008) Code of Practice for Planning Authorities and the provision of schools in particular to Item 2 and the need for consulting with the Department regarding assessment of specific sites.
2. Primary Schools- Enrolment Practice - Information is provided by the Department regarding current education provision in the Craughwell area for Primary Level and notes that total enrolments have increased by 56% over a ten year period, and 32% over the five year period.
3. The submission also notes that there is no Post Primary School in Craughwell and pupils either go to Oranmore or Loughrea for second level education.
4. Existing Educational Sites – The submission states that the existing schools will be required to cater for the educational needs of the existing population for the medium to longer term. The existing school sites should be protected for educational use into the future. In addition, lands adjacent to existing schools should be protected for future educational use to allow for expansion of these schools, if required, subject to site suitability and agreement of school management.
5. Projected Population and Future Educational Requirements- using key pieces of information and applying them to the House Construction Allocation for the area as per CDP and Draft Craughwell LAP – the Department would expect that the existing schools should be capable of catering for the increase in pupil numbers. The matter should however be kept under review.

Response

1. Information regarding the educational infrastructural

Craughwell National School is located 1km from the Village Core along the L4501-84 and is outside and north west of the Draft Development Boundary. The school site consists of 5 acres – 3 acres of which is leased to the Department of Education and Science for the provision of school buildings and 2 acres is leased to the Craughwell Community Sports Group.

It is the strategy of the Council to protect existing community facilities and amenities and to seek to develop new facilities and amenities as the need arises.

The Draft Plan contains a number of policies and objectives for Community Facilities including -

Objective CF2.2: To encourage the provision of community, educational, cultural, recreational, and amenity facilities in tandem with residential, commercial and other development.

S. 13 Development Management Standard and Guidelines also makes specific reference to the provision of schools.

The PA notes the above mentioned guidance documents by the Department of Education and Science and considers that the text within **Section 13.6.1 Community Facilities, Amenity and Open Space** be expanded in order to reference the Department's Technical Guidance Document -025 - Identification and Suitability of Sites for Primary Schools and to their Guidance Document 'The Provision of Schools and the Planning System – A Code of Practice for Planning Authorities, the Department of Education and Science and the Department of Environment Heritage and Local Government and other documents

Amend text under S 13.6.1 of the Draft Plan to read as follows:

The Plan supports the provision of adequate school facilities to serve the local community. No significant development shall take place without an assessment on impact of school provision as outlined within 'Sustainable Residential Development in Urban Areas' (2008, p.44). Sites required for new schools shall comply with the requirements of technical guidance documents published by the Department of Education and Science or any superceding version of these documents, subject to school design and site suitability.

The provision of such facilities shall be guided by the following:

- Technical Guidance Document -025 - Identification and Suitability of Sites for Primary Schools
- The Provision of Schools and the Planning System – A Code of Practice for Planning Authorities, the Department of Education and Science and the Department of Environment Heritage and Local Government
- General Design Guidelines for Schools (Primary and Post-Primary) 2007
- Primary Schools Design Guidelines (2007)
- Construction Standards for Schools (2008)
- Post Primary School Design Guidelines (2008)

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1. For primary schools of 4-8 classrooms, two storeys in height, a minimum site of .071 hectares is recommended and increasing in line with an increase in class units.
2. Provision must be made within the site for adequate car parking and informal hard surfaced play areas for organised sport activities
3. Where on site treatment facilities are proposed, provision must be made for on site treatment facilities in the site size.

2. Total enrolments have increased by 56% over a ten year period, and 32% over the five year period.

Present attendance at Craughwell N.S. is 269 pupils - the school has now reached its maximum capacity (22/04/09:School Principal). There are 36 pupils on a waiting list for entry into the N.S for September 2009. The school is hoping to attain another prefab for the new pupils, if this is unattainable then those on the waiting list will not be accepted into the school. Of the present 269 pupils – 150 pupils are infants up to second class and 119 pupils range across 3rd 4th and 5th classes.

The school has 13 permanent teachers and 2 part-time special need teachers.

The PA notes the increase as outlined by the Department, the actual pupil numbers for the school and those on the school's waiting list.

Not a matter for the present Draft Plan.

3. No Post Primary School in Craughwell

The PA notes this and if the Department considers it appropriate to consider a site for a post-primary school within Craughwell, the PA shall work with the Department in the attainment of such a facility if required.

Not a matter for the present Draft Plan.

4. The existing school site should be protected for educational use into the future, current sites shall cater for medium to long term demand.

Presently there are 5 permanent classrooms, 3 prefab classrooms, a library that has been changed into a special needs room and a PE Hall that has also been changed into a special needs room.

The main concerns regarding Craughwell N.S. include the following:

- Lack of a proper entrance into the school
- The need for an extra classroom
- There is no public transport from the village to the school
- The N6 and L4501-84 both lack public footpaths and public street lighting
- More integration with the GAA club to the rear of the site and the potential to gain more land for the school if required in the future.

A school survey undertaken on the 03/04/09 noted that of the 269 pupils attending the school – 77.5% came by private car, 17% came by bus, 5.4% walked and no pupil cycled to school.

The size of the school site is considered adequate for any future needs. The attainment of funding from the Department for school expansion would seem to be problematic within the current climate. The school is hoping to attain an extra classroom to cater for those on the waiting list.

Lack of connectivity with the Village Core remains problematic. Traffic along the N6 will reduce significantly with the opening of the new motorway and opportunity exists for the

Council to provide for public footpaths/public street lighting to the school under their programme of works.

Provision has been made within the Draft Plan to identify and to provide for 'strategic gateway' entrances for a future link road that will run northwards from the village centre, west of the railway line, parallel with the N6 with potential to link with the L4501-84. The delivery of such a road will be developer driven and may include a cycleway/pedestrian walkway.

The school site is outside the Development Boundary and its protection is not a matter for the current Draft Plan.

No change to the Draft Plan.

5. The Department would expect that the existing schools should be capable of catering for the increase in pupil numbers as per House Construction Allocation for the area as per CDP and Draft Craughwell LAP.

Although the County Settlement Strategy has allocated 500 housing units to Craughwell over the CDP period, it is unlikely that these numbers will be attained within the current economic climate and for the following reasons:

- No new significant development will be permitted within the Plan Area until such time as the public WWTP has been substantially completed. Refer to Section 8.1.1 Water Services Wastewater Treatment and Disposal.
- No significant development shall take place without an assessment on impact of school provision as outlined within 'Sustainable Residential Development in Urban Areas' (2008, p.44) and as outlined within S. 13.6.1 of the Draft Plan.

The school has already reached its maximum capacity and is awaiting a new classroom from the Department. The present site size is adequate for a number of extra classrooms if required over the Plan period.

No change.

Recommendation

1. Amend text under S 13.6.1 of the Draft Plan to read as follows:

The Plan supports the provision of adequate school facilities to serve the local community. No significant development shall take place without an assessment on impact of school provision as outlined within 'Sustainable Residential Development in Urban Areas' (2008, p.44). Sites required for new schools shall comply with the requirements of technical guidance documents published by the Department of Education and Science or any superceding version of these documents, subject to school design and site suitability.

The provision of such facilities shall be guided by the following:

- Technical Guidance Document -025 - Identification and Suitability of Sites for Primary Schools
- The Provision of Schools and the Planning System – A Code of Practice for Planning Authorities, the Department of Education and Science and the Department of Environment Heritage and Local Government
- General Design Guidelines for Schools (Primary and Post-Primary) 2007
- Primary Schools Design Guidelines (2007)
- Construction Standards for Schools (2008)

- Post Primary School Design Guidelines (2008)
 1. For primary schools of 4-8 classrooms, two storeys in height, a minimum site of .071 hectares is recommended and increasing in line with an increase in class units.
 2. Provision must be made within the site for adequate car parking and informal hard surfaced play areas for organised sport activities
 3. Where on site treatment facilities are proposed, provision must be made for on site treatment facilities in the site size.
- 2. Not a matter for the present Draft Plan. No change to the Draft Plan.
- 3. Not a matter for the present Draft Plan. No change to the Draft Plan.
- 4. The school site is outside the Development Boundary and its protection is not a matter for the current Draft Plan. No change to the Draft Plan.
- 5. The present site size is adequate for a number of extra classrooms if required over the Plan period. No change to the Draft Plan.

On the proposal of Cllr Regan and seconded by Cllr Willers it was agreed to accept the recommendations in the Manager's Report

12. Martin Lavelle, Senior Engineer, Road Design, Galway County Council.

Synopsis

1. No map showing road proposals to the south west of the railway line from the Ardahan Road to a point west of the level crossing including pedestrian over bridges to the village centre (refer to planning application files). This route gives an alternative E-W route to facilitate emergency on line works as well as removing level crossing from the equation.
2. Executive summary in 4th paragraph is in conflict with clause 1.5 of the Introduction
3. Is Craughwell 25km from Galway City
4. Include an objective under LU2 as follows:
'All developments to have pedestrian/cyclist/public lighting links to existing village facilities'
5. Objective TA1.5 is not in compliance with the Draft CDP. Also read clause 13.5.1 last paragraph which is in conflict with TA1.5
6. Consider relocation of school and new schools to adjoin playing fields
7. Clause 10.1.1- textual error amend from 'John Hutson' to 'John Huston'
8. The R&T section - object to the proposed inclusion of Craughwell Bridge on the RPS as indicated at (1) Record of Protected Structures
 - (2) Table 10A
 - (3) Objective EH2.8
9. The R&T Section – object to Objective EH4.1 as the already vast areas designated in County Galway are 'representative' as required by Habitats Directive and Wildlife Act.
10. The R&T Section – object to Objective EH4.9 as it only adds extra costs to development for no particular reason.
11. Clause 13.4.3 Roads and Circulation – Bullet point 3 – Remove 'Ramps, pinch points chicanes' and replace with 'raised junctions'. Bullet point 5 – differentiate between residential on home site parking versus commercial/ residential/retail parking requirements.