# SEA ENVIRONMENTAL REPORT APPENDIX III — Non-Technical Summary

**FOR** 

# PROPOSED MATERIAL ALTERATIONS TO THE

# DRAFT GORT LOCAL AREA PLAN 2025-2031

for: Galway County Council



by: CAAS Ltd.



**MAY 2025** 

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## Section 1 Introduction and Terms of Reference

This is the Non-Technical Summary of the Environmental Report for Proposed Material Alterations to the Gort Draft Local Area Plan (LAP) 2025-2031. The purpose of the Environmental Report is to provide a clear understanding of the likely environmental consequences of decisions regarding certain Proposed Material Alterations. The Environmental Report has been prepared as part of a Strategic Environmental Assessment (SEA) process for the Plan and associated Proposed Material Alterations.

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

#### What is SEA?

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

#### Why is SEA needed? The Benefits

SEA is the Council's and the public's guide to what are generally the best areas for development in the Plan area. SEA enables the Council to direct development towards robust, well-serviced and connected areas in the Plan area – thereby facilitating the general avoidance of incompatible development in the most sensitive, least well-serviced and least well-connected areas, in the Plan area and beyond. SEA provides greater certainty to the public and to developers. Plans are more likely to be adopted without delays or challenges and planning applications are more likely to be granted permission. Environmental mitigation is more likely to cost less.

The Draft Plan, to which the Proposed Material Alterations relate, directs incompatible development away from the most sensitive areas in the Plan area and focuses on directing compact, sustainable development within the proposed envelope of the Plan area. Development of these generally more robust, well-serviced and well-connected areas of the Plan area will contribute towards environmental protection and sustainable development, including climate mitigation and adaptation. Compact development can be accompanied by placemaking initiatives to enable the Plan area to become a more desirable place to live – so that it maintains populations and services. Compatible sustainable development in sensitive areas is also provided for, subject to various requirements relating to environmental protection and management being met.

#### **Difficulties Encountered during the SEA process**

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

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

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

# Section 2 The Draft Plan and associated Proposed Material Alterations

#### 2.1 Introduction and Content

The Draft Gort Local Area Plan 2025-2031, to which the Proposed Material Alterations relate, has been prepared pursuant to Section 20 of the Planning and Development Act 2000 (as amended). The purpose of the Plan is to put in place a land use framework that will guide the future sustainable development of the Gort area. The Plan, in conjunction with the County Development Plan, will inform and manage the future development of the area.

### 2.2 Draft Plan Format

The Draft Plan comprises a written statement and a series of maps that provide a graphic representation of the content of the written text. Where there is any discrepancy between the text and maps, the text shall take precedence. A Local Transport Plan forms part of the Draft Plan. The Draft Plan is accompanied by a number of additional supporting documents which have informed the crafting of the Plan.

## 2.3 Overall Strategy and Objectives

The Draft Plan sets out a Vision as follows: "Gort is a Self-Sustaining, vibrant, and socially inclusive town with a focus on protecting and enhancing its historical core, natural environment, supporting an educated workforce, and providing a range of supporting services/facilities/amenities. This plan will be delivered through a managed and phase development strategy of appropriately zoned and serviced lands to achieve balanced and sustainable growth for Gort and the immediate environment that it serves."

The following strategic aims will assist in delivering the vision for Gort:

- Promote Gort as a Self-Sustaining Town as set out in the GCDP 2022 2028 and continue to support a sustainable level of population growth as established in the Core Strategy up to 2028 and beyond.
- Support the delivery of residential units on appropriately zoned land targeted in the Housing Strategy set out in Chapter 2 of the GCDP 2022 2028, encouraging sequential and compact growth in the town.
- Promote the reuse of existing buildings for residential use, where appropriate, having regard to the receiving environment, access to services, capacity of public infrastructure, and the delivery of a high quality of residential amenity.
- The strategic location of Gort shall be harnessed to enhance the economic and employment potential of the town, by creating sustainable employment opportunities, supported by investment on appropriately zoned lands.
- Maintain a strong and vibrant town centre that sustains the ability to attract new businesses, which meets the retail and service needs of the town and surrounding areas.
- Support the principle of the Gort Inse Guaire Town Centre First Plan (September 2023) which seeks to deliver holistic sustainable regeneration for the current and future needs of the local community through engagement with local business owners, community representatives, and stakeholders.
- Encourage and foster appropriate tourism opportunities that capitalise on Gort's tourist potential and better promote itself
  as a traditional Irish market town, with strong links to its natural, cultural and architectural heritage.
- Provide suitable recreation facilities, amenities and support services that shall promote an inclusive and cohesive local
  environment and serve the needs of the whole community.
- Support the redevelopment of underutilised buildings within the town centre to accommodate multi-functional community and cultural spaces, to facilitate the growth of remote-working, cultural, creative and community sectors in the town centre.
- Protect and enhance the heritage and character of Gort, including the natural assets, environment, built heritage, public realm, local character, and amenity for the benefit of current and future generations.
- Actively encourage sustainable mobility, including walking and cycling, in accordance with the aspirations of the LTP and support the continued provision of investment in public transport and active travel infrastructure.

## The Plan addresses topics including:

- Land Use Zoning
- Residential Development
- Residential Infill
- Economic and Enterprise Development
- Community Facilities
- Built and Natural Heritage
- Tourism
- Agricultural
- Transportation and Movement Local Transport Plan

- Water Supply and Wastewater Treatment
- Flood Risk Management
- Opportunity Sites

## 2.4 Strategic work undertaken by the Council to ensure evidence-based planning

Far in advance of the placing of the Draft Plan on public display, Galway County Council undertook various works in order to inform the preparation of the Plan. The findings of this strategic work have been integrated into the Plan and will contribute towards both environmental protection and management and sustainable development.

The undertaking of this SEA process was part of this strategic work and contributed towards the integration of environmental considerations into the Plan, as summarised in Section 6 "Mitigation and Monitoring Measures" of this report.

## 2.5 Proposed Material Alterations

The Proposed Material Alterations are outlined in detail in the accompanying Proposed Material Alterations document. The Alteration Numbers provided in this report can be used to locate the associated detail in the accompanying Proposed Material Alteration document. Alterations proposed include those relating to maps, including land use zoning, and text. The Proposed Material Alterations were screened for the need to undertake SEA and Alterations Nos. MA36, MA37 and MA38 were determined as requiring full SEA. The SEA Screening Determination accompanies the SEA Environmental Report and the Proposed Material Alterations document. Appendix II to the SEA Environmental Report comprises the SEA Screening Report that was prepared to inform the Determination.

## 2.6 Relationship with other relevant Plans and Programmes

It is important to note that when reading the Plan, the policy objectives of the County Development Plan are relevant and, in this regard, both documents should be read in tandem with each other. As provided for by Policy Objective GSST 1 "Consistency with Core Strategy", "Galway County Council will ensure that developments permitted within the settlement of Gort are consistent with the zoned land allocations in the Core Strategy and associated provisions of the Galway County Development Plan 2022 - 2028."

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

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

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

## **Section 3** The Environmental Baseline

#### 3.1 Introduction

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

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

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

As a result, there would be both:

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

## 3.3 Biodiversity and Flora and Fauna

Key ecological sensitivities within and surrounding the Plan area include:

- Designated European sites in close proximity to the Plan boundary, comprising the Coole-Garryland Complex Special Area of Conservation<sup>1</sup> and Special Protection Area<sup>2</sup> located c. 0.3 km to the north-west of the Plan area. The sensitive features of the Coole-Garryland Complex Special Area of Conservation include: turloughs; rivers with muddy banks; limestone pavements; lesser horseshoe bat; and whooper swan.
- Non-statutorily proposed sites comprising:
  - The Coole-Garryland Complex proposed Natural Heritage Area<sup>3</sup> located c. 0.3 km to the Plan area,
  - Pollduagh Cave, Gort proposed Natural Heritage Area located c. 0.7 km to the south of the Plan area;
  - East Burren Complex proposed Natural Heritage Area, located c. 2 km to the south-west of the Plan area; and
  - Lough Cutra proposed Natural Heritage Area, located c. 2.5 km to the south-east of the Plan area.
- Other designated sites surrounding the Plan area, including: East Burren Complex Special Area of Conservation located c. 2 km to the south-west of the Plan area; Lough Cutra Special Area of Conservation and Special Protection Area located c. 2.5 km to the south-east of the Plan area; Coole Lough and Garryland Wood Ramsar Site and Coole Garryland Nature Reserve located c. 0.5 km to the north-west of the plan area;
- Locally important, non-designated habitats within and surrounding the Plan area, various woodlands, mature
  trees, parks, gardens, hedgerows, old buildings/stone walls and lands used for agriculture within and surrounding the Plan
  area, providing habitats for flora and fauna and facilitating linkages and corridors to the surrounding countryside for the
  wildlife; and
- Aquatic and riverine ecology associated with rivers and streams and their tributaries and riparian buffer zones, including
  the Cannahowna River; Garryland Turlough and Caherglassaun Turlough<sup>4</sup>.

<sup>&</sup>lt;sup>1</sup> SACs have been selected for protection under the European Council Directive on the conservation of natural habitats and of wild fauna and flora (92/43/EEC) due to their conservation value for habitats and species of importance in the European Union. The Habitats Directive seeks to establish Natura 2000, a network of protected areas throughout the EU. It is the responsibility of each member state to designate SACs to protect habitats and species, which, together with the SPAs designated under the 1979 Birds Directive, form Natura 2000. The European Communities (Birds and Natural Habitats) Regulations 2011 consolidate the European Communities (Natural Habitats) Regulations 1997 to 2005 and the European Communities (Birds and Natural Habitats) (Control of Recreational Activities) Regulations 2010. The Regulations have been prepared to address several judgments of the Court of Justice of the European Union (CJEU) against Ireland, notably cases C-418/04 and C-183/05, in respect of failure to transpose elements of the Birds Directive and the Habitats Directive into Irish law.

<sup>&</sup>lt;sup>2</sup> SPAs have been selected for protection under the 1979 European Council Directive on the Conservation of Wild Birds (79/409/EEC) - referred to as the Birds Directive - due to their conservation value for birds of importance in the EU.

<sup>&</sup>lt;sup>3</sup> Natural Heritage Areas (NHAs) are designated due to their national conservation value for ecological and/or geological/geomorphological heritage. They cover nationally important semi-natural and natural habitats, landforms or geomorphological features, wildlife plant and animal species or a diversity of these natural attributes. NHAs are designated under the Wildlife (Amendment) Act 2000. Proposed NHAs (pNHAs) were published on a non-statutory basis in 1995, but have not since been statutorily proposed or designated.

<sup>&</sup>lt;sup>4</sup> Turloughs are unique to limestone regions in the west of Ireland. These seasonal lakes are home to a characteristic suite of animals and plants that are adapted to the fluctuating water table and include some rarities such as fen violet, alder buckthorn and dropwort. Turloughs are abundant in the north,

Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) within 15 km of the Plan area are mapped at Figure 3.1.

Land cover is the observed physical cover, as seen from the ground or through remote sensing, including for example natural or planted vegetation, water and human constructions which cover the earth's surface. The CORINE 2018<sup>5</sup> mapping (shown on Figure 3.2) identifies the land cover of central parts of the Plan area as urban fabric with adjacent areas of pastures and land principally occupied for agriculture with significant areas of natural vegetation, inland marshes, water bodies and broad-leaved forests. Categories from CORINE mapping that may indicate areas with the potential for Annex I habitats situated in close proximity to and surrounding the Plan area comprise inland marshes and broad-leaved forests.

#### **Existing Problems**

Ireland's Article 17 report on the Status of EU Protected Habitats and Species in Ireland (DCHG, 2019) identifies various Irish, EU-protected habitats and species to be of unfavourable status and many to be still declining, although it also identifies that a range of positive actions are underway. Ireland's Article 12 Birds Directive Reports and the 6<sup>th</sup> National Report under the Convention of Biological Diversity identify similar issues.

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

Previous changes in land uses arising from human development have resulted in a loss of biodiversity and flora and fauna; however, legislative objectives governing biodiversity and fauna were not identified as being conflicted with. The Plan includes measures to contribute towards the protection of biodiversity and flora and fauna and associated ecosystem services.

## 3.4 Population and Human Health

The results of Census 2022 recorded a population of 2,870 persons within the new CSO boundary of Gort<sup>6</sup>.

The Core Strategy in the Galway County Development Plan 2022-2028 provides for a population growth in Gort up to 800 persons over the Plan period and projects that an additional 460 residential units will be required to support this growth.

Gort has been designated as a Self-Sustaining Town in the Galway County Development Plan 2022-2028. Self-Sustaining Towns are identified as having high-levels of population growth and a weak employment base and are reliant on other areas for employment and/or services requiring targeted 'catch up' investment to become more self-sustaining.<sup>7</sup>

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

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

Human health has the potential to be impacted upon by environmental vectors (i.e. environmental components such as air, water or soil through which contaminants or pollutants, which have the potential to cause harm, can be transported so that they come into contact with human beings). Hazards or

east and south of County Galway and there are a number of exceptional turlough sites in the region, including: Coolcam, Croaghill, Ballinastack, Coole-Garryland and Glenamaddy Turloughs. Rahasane Turlough near Craughwell is the largest in Ireland and is important for over-wintering birds.

<sup>&</sup>lt;sup>5</sup> The CORINE (Co-ordinated Information on the Environment) land cover data series was devised as a means of compiling geo-spatial environmental information in a standardised and comparable manner. CORINE has become a key data source for informing environmental and planning policy on a national and European level. The main land cover type in Ireland is agricultural land including forestry, which accounts for two-thirds of the national landmass. Most of this is permanent grassland pastures. Peatlands and wetlands are the second most widespread land cover type, covering almost one-fifth of the country. While forested areas cover about one-tenth of the country. Despite rapid development in the past two decades, Ireland's landscape is predominantly rural and agricultural.

<sup>&</sup>lt;sup>6</sup> It is noted that the current population figures and population projections in the new Gort Local Area Plan are based on the 2016 Census. The 2022 Census created new urban geography called Built Up Areas (BUAs) for urban areas. Due to definition of BUAs it is not possible to directly compare the 2016 Census (Draft Gort LAP 2025).

<sup>&</sup>lt;sup>7</sup> Galway County Development Plan 2022-2028

nuisances to human health can arise as a result of exposure to these vectors arising from incompatible adjacent land uses for example. These factors have been considered with regard to the description of: the baseline of each environmental component; and the identification and evaluation of the likely significant environmental effects of implementing the Plan.

#### **Existing Problems**

The number of homes within the Plan area with radon levels above the reference level is within the normal range experienced in other locations across the country<sup>8</sup>.

Parts of the Plan area are vulnerable to adverse effects from changes in the occurrence of severe rainfall events and associated flooding from surface water. Flooding in certain circumstances could pose a risk to human health. There is historic and predictive evidence of flooding within the Plan area (see subsection 3.6).

#### 3.5 **Soil**

Main soil types<sup>9</sup> surrounding the built-up areas<sup>10</sup> of Gort are: brown earths (well-drained mineral soils, associated with high levels of natural fertility); and alluvial soils (associated with alluvial clay, silt or sand river deposits). Other soils surrounding the Plan area include peat soils. Peat soils are often indicative of areas that are the most sensitive to development due to ecological sensitivities and impeded drainage issues.

Geological Survey Ireland coordinate the Irish Geological Heritage Programme, whereby an objective has been set to identify and select sites of geological interest within each county across the country. County Geological Sites (CGSs) do not receive statutory protection like Natural Heritage Areas but receive an effective protection from their inclusion in the planning system. The audit of CGSs in County Galway was completed in 2019, which identified 134 CGSs. There are no designated County Geological Sites occurring within the Plan area. The closest CGSs to the Plan area are: Coole-Garryland Complex CGS (Site Code: GY038), located c. 1 km to the north-west and west of the Plan area; and Beagh Sink-Pollduagh System CGS, located c. 1 km to the south of the Plan area.

The term "landslide" describes a wide variety of processes that result in the downward and outward movement of materials such as rock, debris, earth, mud and peat under the force of gravity. Issues such as existing ground conditions, slope stability and storage of excavated material have the potential to influence susceptibility to landslides/bog bursts. The potential impacts of landslides include loss of human life/injury, flooding, pollution of watercourses and impacts upon aquatic biodiversity. The GSI have identified the Plan area as having mainly low levels of landslide susceptibility.

In the absence of mitigation, contaminated materials have the potential to adversely impact upon human health, water quality and habitats and species. As is the case with other urban and semi-urban areas across the country, there is potential for contamination at sites within the Plan area, especially where land uses occurred in the past, in the absence of environmental protection legislation.

#### **Existing Problems**

Legislative objectives governing soil were not identified as being conflicted with.

#### 3.6 Water

Since 2000, Water Management in the EU has been directed by the Water Framework Directive 2000/60/EC (WFD). The WFD requires that all Member States implement the necessary measures to prevent deterioration of the status of all waters - surface, ground, estuarine and coastal - and protect,

<sup>&</sup>lt;sup>8</sup> The greatest health risk from radiation in Ireland is caused by radon. The presence of radon gas, a naturally occurring radioactive gas that originates from the decay of uranium in rocks and soils, occurs across the country. It accounts for more than half of the total radiation dose received by the Irish population. As a known carcinogen, in the same category as tobacco smoke and asbestos it is a cause of lung cancer. Exposure to radon for long periods or at high concentrations can lead to lung cancer. Mapping available at <a href="http://www.epa.ie/radiation/radonmap">http://www.epa.ie/radiation/radonmap</a>

<sup>&</sup>lt;sup>9</sup> All soil types belong to a Sub-Group and so in turn to one of the 11 soil Great Groups. Great Groups and Sub-Groups are a hierarchical arrangement of soils used for taxonomical classification (http://gis.teagasc.ie/soils/soilguide.php).

<sup>&</sup>lt;sup>10</sup> The built-up areas are mainly made up of urban soils. Urban soils are soils, which have been disturbed, transported or manipulated by human activity in the urban environment and are often overlain by a non-agricultural, man-made surface layer that has been produced by mixing, filling or by contamination of land surfaces in urban and suburban areas.

<sup>11</sup> https://www.gsi.ie/en-ie/programmes-and-projects/geohazards/projects/Pages/Landslide-Susceptibility-Mapping.aspx

enhance and restore all waters with the aim of achieving *good status*. All public bodies are required to coordinate their policies and operations so as to maintain the *good status* of water bodies that are currently unpolluted and improve polluted water bodies to *good status*.

Surface water in and around the Plan area is channelled by rivers and streams and their tributaries forming part of the Galway Bay South East River Catchment. The Cannahowna (Ballyhugh) River and its tributaries flows from south to north through the centre of the Plan area. The current WFD (2016-2021) status<sup>12</sup> of the rivers and streams draining the Plan area are *good* (identified by the EPA as 'Kilchreest\_010') and *moderate* (identified by the EPA as 'Cannahowna\_010'). The WFD (2016-2021) status of the Lough Cutra, c. 2 km to the south-east of the Plan area, is identified as *good*. The WFD status (2016-2021) of groundwater underlying the Plan area is currently identified as being of *poor* status throughout the centre of the Plan area, associated with Caherglassaun Turlough.

Figure 3.3 illustrates WFD surface water and groundwater status within and surrounding the Plan area.

Strategic Flood Risk Assessment (SFRA) is being undertaken as part of the preparation of the Local Area Plan and associated Proposed Material Alterations. Requirements in relation to SFRA are provided under 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (Department of Environment and Office of Public Works, 2009) and associated Department of the Environment, Community and Local Government Circular PL2/2014. Flood risk management and drainage provisions are already in force through the Galway County Development Plan 2022-2028 and related provisions have been integrated into the Draft Plan. The land use zoning contained within the Plan has been informed by the SFRA process and associated delineation of flood risk zones.

Historical flooding is documented by the Office of Public Works. Predictive flood risk mapping is also available from the Office of Public Works and is included in the SFRA document that accompanies the Plan. The most significant sources of flood risk within the Plan area are from groundwater and fluvial sources (from rivers and streams). There are other sources of flooding present including from pluvial (rainwater) and from surface drainage systems sources.

#### **Existing Problems**

Subject to exemptions provided for by Article 4 of the WFD, based on available water data, the recorded status of certain surface water bodies will need improvement in order to comply with the objectives of the WFD. The Plan includes provisions that will contribute towards improvements in the status of waters.

There is elevated levels of flood risk from groundwater and fluvial sources at various locations across the Plan area. The preparation of the Plan, SEA and SFRA has taken place concurrently and the findings of the SFRA have informed both the Plan and the SEA.

<sup>&</sup>lt;sup>12</sup> As per EPA's WFD Status 2016-2021 classification (https://gis.epa.ie/EPAMaps/).

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

River or Stream

Special Area of Conservation

Special Protection Area

OpenStreetMap Contributors (CC BY-SA 2.0) EU DEM / NPWS, EPA, & OSI (CC BY 4.0)

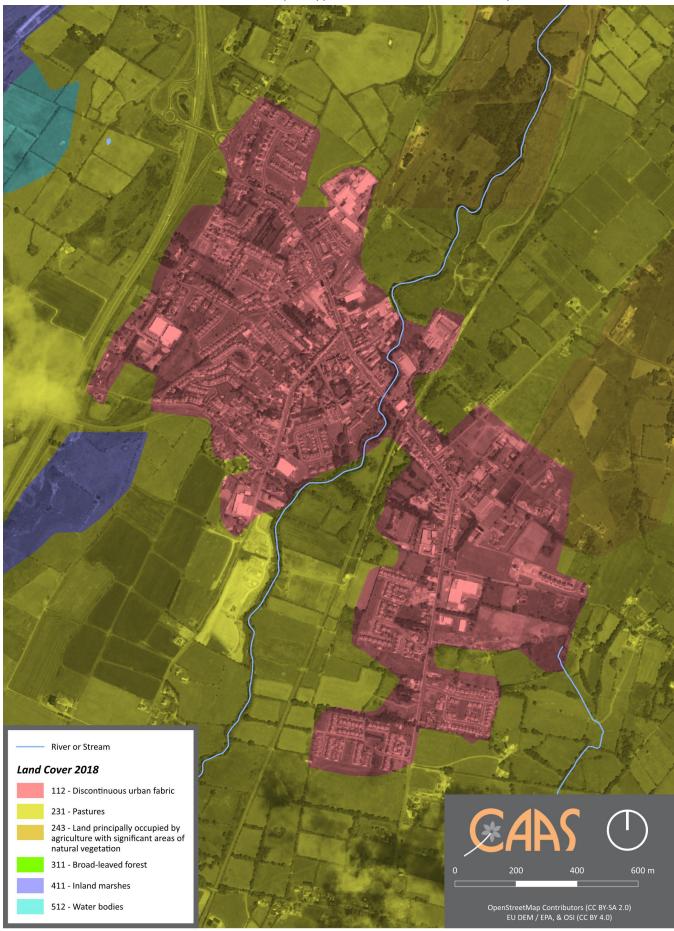


Figure 3.2 CORINE Land Cover Mapping 2018

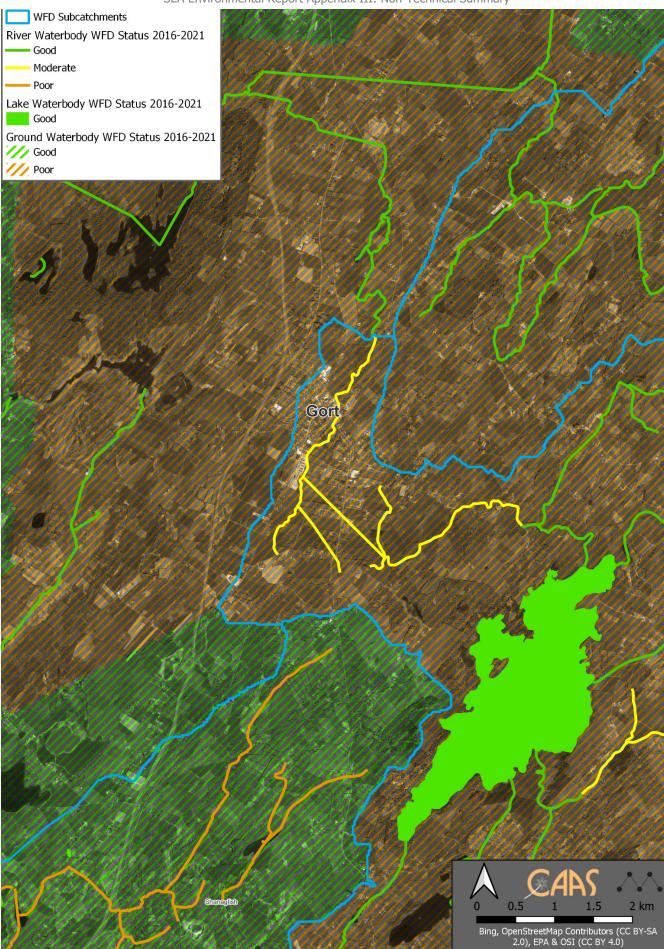


Figure 3.3 Surface Water Status (2016-2021)

#### 3.7 Air and Climatic Factors

Total emissions of greenhouse gases by humans come from various sectors including transport, agriculture, energy industries, manufacturing combustion, industrial processes, residential developments, commercial services developments, waste management processes and fluorinated gases equipment (such as refrigeration and fire protection systems).

In 2023, Ireland's greenhouse gas emissions are estimated to be 55.01 million tonnes carbon dioxide equivalent (Mt  $CO_2$  eq), which is 6.8% lower (or 4.00 Mt  $CO_2$  eq) than emissions in 2022 (59.00 Mt  $CO_2$  eq) and follows a 2.0% decrease in emissions reported for 2022. Emissions are 1.2% below the historical 1990 baseline for the first time in 33 years. In 2023, emissions in the stationary EU Emissions Trading System emissions (covering emissions from sectors including Agriculture, Transport, Energy, Industries, Residential, Manufacturing Combustion and Industrial Processes) decreased by 17%. When land use, landuse change and forestry is included, total national emissions decreased by 3.8%. Emissions under the Effort Sharing Regulation (covering emissions from the electricity and heat generation, industrial manufacturing and aviation sectors) decreased by 3.4%. Decreased emissions in 2023 compared to 2022 were observed in the largest sectors except for transport which showed an increase of 0.3%.

Climate mitigation describes the action to reduce the likelihood of climate change occurring or reduce the impact if it does occur. This can include reducing the causes of climate change (e.g. emissions of greenhouse gases) as well as reducing future risks associated with climate change. The National Climate Action Plan 2024 is the second statutory update to the plan since the Climate Action and Low Carbon Development (Amendment) Act 2021 was signed into law, committing Ireland to 2030 and 2050 targets for reducing greenhouse gas emissions. It builds on Climate Action Plan 2023, outlining how Ireland will accelerate the actions required to respond to the climate crisis, putting climate solutions at the centre of Ireland's social and economic development.

The Climate Action Plan 2025 is the third statutory annual update to the Climate Action Plan. Climate Action Plan 2025 lays out a roadmap of actions that are intended to lead to meeting the national climate objective of pursuing and achieving, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy. It aligns with legally binding economy-wide carbon budgets and sectoral emissions ceilings. Climate Action Plan 2025 builds upon the Climate Action Plan 2024 by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings and it should be read in conjunction with Climate Action Plan 2024. The Plan provides a roadmap for taking decisive action to halve Ireland's emissions by 2030 and achieve climate neutrality by no later than 2050, as committed to in the Climate Action and Low Carbon Development (Amendment) Act 2021.

Climate adaptation is a change in natural or human systems in response to the impacts of climate change. These changes moderate harm or exploit beneficial opportunities and can be in response to actual or expected impacts. The National Adaptation Framework (2024) aims to create a unified approach involving both government and society to adapt to climate change. It outlines how various sectors and local authorities can implement adaptation measures to minimise Ireland's vulnerability to climate change's adverse effects while taking advantage of any beneficial impacts. The Framework emphasises the importance of integrating adaptation strategies into all levels of policy making, infrastructure development, and local planning.

The Galway Climate Action Plan 2024-2029 will contribute towards addressing the mitigation of greenhouse gas emissions, climate change adaptation, and strengthening the alignment between national climate policy and the delivery of local climate action. The local objectives of Galway County Council's Climate Action Plan 2024-2029 are grouped under the following themes:

- Governance and Leadership
- Energy and Built Environment
- Transport
- Communities and Partnership
- Circular Economy
- Land Use and Green Infrastructure
- Adaptation to Climate Risk

The EPA's (2024) Air Quality in Ireland 2023 Report identifies that:

- Ireland's latest monitoring shows we are in compliance with current EU standards.
- Ireland is not on track to achieve its ambition, set out in the National Clean Air Strategy, to meet the health-based WHO air quality guideline limits in 2026.
- Main pollutants of concern are fine particulate matter (PM<sub>2.5</sub>) from solid fuel combustion and nitrogen dioxide (NO<sub>2</sub>) from vehicle emissions/traffic.
- Air pollution can be a major environmental risk to people's health, with approximately 1,600 premature deaths annually in Ireland due to poor air quality.

The report further identifies the critical role of local authorities in the enforcement and implementation of existing plans and investment in infrastructure to encourage cleaner and healthier air quality choices, including:

- Local authorities must provide more resources to implement the new solid fuel regulations and full implementation of air quality plans.
- Local authorities must prioritise resource allocation of resources to advance enforcement.
- Investment in clean public transport infrastructure across the country must be maintained and increased.
- More safe footpaths and cycle lanes must be created to continue to increase active travel as a viable and safe alternative to car use and associated NO<sub>2</sub> emissions.

#### **Existing Problems**

Significant progress is being made in the reduction of Ireland's greenhouse gas emissions. The EPA's 2024 publication Ireland's Greenhouse Gas Emission Projections 2023-2040 identifies that Ireland's emissions, under the Emissions in the 'Planned Additional Measures' scenario, which includes most 2024 Climate Action Plan measures, are projected to be 29% lower in 2030 (compared with 2018). However, this would not meet the 51% emissions reduction target (by 2030 compared to 2018) based on these projections.

In the Climate Change Advisory Council's *Annual Review 2024*, the findings of an assessment of the degree to which progress is being made solely in the implementation of adaptation policy and increasing resilience for the period April 2023 to March 2024 is provided. The Review details that four sectors (Transport, Flood Risk Management, Built and Archaeological Heritage and Local Government) demonstrated good overall progress, six showed moderate progress (Agriculture, Forestry and Seafood, National Adaptation Framework, Communications Networks, Water Quality and Water Services Infrastructure, Health and Electricity and Gas Networks) and one (Biodiversity) showed no progress and supplied insufficient evidence. This was a slight improvement compared with the results in 2023.

Air quality and noise can present challenges, especially in urban areas, as detailed under the relevant subsections above. With regard to air quality, air pollution from transport is dominated by  $NO_x$  emissions. Of these,  $NO_2$  is particularly impactful from a health perspective. The Draft Plan will help to facilitate reductions in emissions and a transition from dependence on fossil fuel combustion powered transport.

#### 3.8 Material Assets

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

#### **Public Assets and Infrastructure**

Public assets and infrastructure that have the potential to be impacted upon by the Plan, if unmitigated, include: resources such as public open spaces, parks and recreational areas; public buildings and services; transport and utility infrastructure (electricity, gas, telecommunications, water supply, waste water infrastructure etc.); and natural resources that are covered under other topics such as water and soil.

#### Land

The Plan has the potential to assist with the reuse and regeneration of brownfield sites thereby contributing towards sustainable mobility and reducing the need to develop greenfield lands and associated potential adverse environmental effects. Brownfield lands are generally located within urban/suburban areas.

#### **Green Infrastructure**

Parks and open space promote health and well-being, provide recreational facilities and range of habitats for various species. Green infrastructure is also a crucial component in building resilient communities

capable of adapting to the consequences of climate change with trees, woodlands and wetlands providing carbon capture and slowing water flows while improving air quality.

#### Woodland

Woodlands provide recreational opportunities in addition to their heritage and economic benefits. They are a valuable resource in terms of biodiversity, recreation and tourism, and also important as links in the green infrastructure network. The largest areas of woodland occur in the north of the Plan area, on the flood plain of the Cannahowna River.

#### Transport

Gort is located on a number of well served transport links, including the Galway-Limerick InterCity train line. The M18 also bypasses the town, which provides links to Ennis, Shannon and Limerick, and also joins the M6 and M17, which provides links to Galway, Athenry, Dublin and the rest of the Country. In addition, bus services are provided by Bus Éireann with daily services to Galway. National, regional and local roads provide vital links between the towns and villages to retail, service and employment centres throughout the County and to adjoining counties. A Local Transport Plan forms part of the Draft Plan and will help to ensure a shift towards more sustainable modes of transport.

#### **Waste Water**

The Wastewater Treatment Plant (WWTP) serving the Plan area is currently not listed as a priority area<sup>13</sup> (such areas are those where improvements are required to resolve urgent environmental issues).

The Gort WWTP has a design capacity of 4,310 Population Equivalent (PE), with current load of 3,696 PE.<sup>14</sup> As indicated by Uisce Éireann, this plant has spare capacity available.<sup>15</sup>

The Gort WWTP (Registration No. D00195-01) is currently non-compliant with the Emission Limit Values (ELVs) set in the Wastewater Discharge Licence in the most recent available Annual Environmental Report 2023 (published in April 2024), due to exceedance of Ammonia Total (as N) mg/l.<sup>16</sup>

#### **Water Supply**

Gort is located within the Gort Water Resource Zone<sup>17</sup> and, as identified by Uisce Éireann, has potential capacity available to meet targeted population growth by 2032, although an improvement in level of service is required.<sup>18</sup>

Drinking water in the Plan area is supplied by the Gort Public Water Supply via the Gort Water Treatment Plant, which serves a population of 2,638 people. Water is abstracted mainly from the Gort or Cannahowna River, supplemented with water from two boreholes<sup>19</sup>.

Under Section 58 of the Environmental Protection Agency Act 1992, the EPA is required to collect and verify monitoring results for all water supplies in Ireland covered by the European Communities (Drinking Water) Regulations, 2000. The EPA publishes their results in annual reports that are supported by Remedial Action Lists (RALs). The RAL identifies water supplies that are not in compliance with the Regulations mentioned above. The most recent EPA Remedial Action List (Q2 of 2024, published in February 2024)<sup>20</sup> does not include any water scheme that supplies the Plan area.

#### **Waste Management**

The National Waste Management Plan for a Circular Economy (Regional Waste Management Planning Offices, 2024) sets out a framework for the prevention and management of waste in Ireland for the period 2024 to 2030. The Plan seeks to influence sustainable consumption and prevent the generation of waste, improve the capture of materials to optimise circularity and enable compliance with policy and legislation.

 $<sup>^{13}\</sup> https://www.epa.ie/publications/compliance--enforcement/waste-water/Priority-areas-for-website-April-2024.pdf$ 

<sup>&</sup>lt;sup>14</sup> https://www.water.ie/sites/default/files/docs/aers/2023/D0195-01\_2023\_AER.pdf

<sup>&</sup>lt;sup>15</sup> Uisce Eireann: Settlements with Waste Water Discharge Authorisations - *Wastewater Treatment Capacity Register*. The register provides an indication of available wastewater treatment capacity based on loads received in 2021 and available treatment plan capacity now or by completion of a project by 2024 (where relevant). Available at: https://www.water.ie/connections/developer-services/capacity-registers/wastewater-treatment-capacity-register/galway (Published in June 2022).

<sup>16</sup> https://www.water.ie/sites/default/files/docs/aers/2023/D0195-01\_2023\_AER.pdf

<sup>&</sup>lt;sup>17</sup> A Water Resource Zone (WRZ) is an independent water supply system serving a region, city, town or village and is governed by topography or the extent of the water distribution network in an area. A WRZ may include multiple Water Treatment Plants and/or sources.

<sup>&</sup>lt;sup>18</sup>This may take the form of leakage reduction and/or capital investment to maintain/improve levels of service as the demand increases. Proposed solutions will be developed and prioritised through the National Water Resources Plan and investment planning process. Source: https://www.water.ie/connections/developer-services/capacity-registers/water-supply-capacity-register/galway (Published in June 2023).

<sup>&</sup>lt;sup>19</sup> https://www.epa.ie/publications/compliance--enforcement/drinking-water/audit-reports/galway/Audit-Gort-PWS-04032022.pdf

<sup>&</sup>lt;sup>20</sup> Available at: https://www.epa.ie/publications/compliance--enforcement/drinking-water/annual-drinking-water-reports/Q2-2024-RAL-for-public-drinking-water-supplies-FINAL.pdf

#### **Existing Problems**

The provisions of the Plan will contribute towards protection of the environment with regard to impacts arising from material assets. The provision of infrastructure and supporting services for development, particularly water and wastewater services, is critical.

## 3.9 Cultural Heritage

#### Archaeological Heritage

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

There are various entries to RMP within and surrounding the Plan area including: castles; churches; graveyards; holy wells; ringforts; enclosures; ponds; and ecclesiastical remains. There are several Zones of Notification within the boundary of the Plan area.

#### **Architectural Heritage**

Protected structures are defined in the Planning and Development Act 2000 as amended as structures, or parts of structures that are of special interest from an architectural, historical, archaeological, artistic, cultural, scientific, social or technical point of view.

There are a number of entries in the RPS within the Plan area, as set out in 6 of Galway County Development Plan 2022-2028, examples of which include: railway stations; religious buildings; courthouses; barracks; terraced houses; and schools. Clusters of architectural heritage are indicated within the town's centre. Notable Protected Structures include: a well-preserved Georgian period market town; St. Colman's Catholic Church; Gort Crane House; Gort Library; Gort Bridge; and St. Colman's Hall Heritage Centre. Many of these Protected Structures are located within central parts of Gort and within the Architectural Conservation Area (ACA).

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

#### **Existing Problems**

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

## 3.10 Landscape

Gort is located in a generally flat area towards the south of the County of Galway. The Cannahowna River runs from south to north through the centre of the Plan area and provides a recreational amenity for the town (3 km looped Gort River Walk). The land surrounding Gort is predominantly made up of agricultural lands with woodlands associated with the Coole-Garryland Nature Reserve to the north-west and Lough Cutra to the south-west of the Plan area.

The town centre is largely arranged along two wide intersecting roads which intersect at Market Square. The river and its banks, surviving military buildings, traditional shopfronts and narrow lanes entered through carriage arches are distinctive and important features. Stone walls are another significant feature of the area, particularly those around Slipper Street and Barrack Street. The retention of the character of the historic core in Gort is recognised as being a major attraction to the town.<sup>21</sup>

The existing Galway County Development Plan 2022-2028 identifies three Landscape Regions, which include ten Landscape Character Types (subdivided into smaller Landscape Character Units) and 52

<sup>&</sup>lt;sup>21</sup> Draft Gort Local Area Plan 2025-2031 CAAS for Galway County Council

Viewing Points and seven Scenic Routes within the Council's administrative area. Landscape Character Units in County Galway are arranged in a hierarchy according to the level of their sensitivity.

The Plan area is located within the 'Urban Environs' and 'Kilchreest Basin Unit' Landscape Character Units. There is one scenic route designated within the Plan area, 'Slieve Aughty Scenic Route'. There are no Protected Views designated within the Plan area.

#### **Existing Problems**

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

## 3.11 Strategic Environmental Objectives

Strategic Environmental Objectives (SEOs) are methodological measures developed from policies that generally govern environmental protection objectives established at international, Community or Member State level e.g. the environmental protection objectives of various European Directives that have been transposed into Irish law and which are required to be implemented. The SEOs are set out under a range of topics (see Table 3.1) and are used as standards against which the provisions of the Plan, the alternatives and the Proposed Material Alterations are evaluated in order to help identify which provisions would be likely to result in significant environmental effects and where such effects would be likely to occur, if – in the case of adverse effects – unmitigated.

Table 3.1 Strategic Environmental Objectives

Table 3.1 Stra	tegic I	<u>Environmental (</u>	Objectives
Environmental	SEO	Guiding	Strategic Environmental Objectives
Component	Code	Principle	
Biodiversity, Flora and Fauna	BFF	No net contribution to biodiversity losses or deterioration	<ul> <li>To preserve, protect, maintain and, where appropriate, enhance the terrestrial, aquatic and soil biodiversity, particularly EU designated sites and protected species</li> <li>Ensure no adverse effects on the integrity of any European site, with regard to its qualifying interests, associated conservation status, structure and function</li> <li>Safeguard national, regional and local designated sites and supporting features which function as stepping stones for migration, dispersal and genetic exchange of wild species</li> <li>Enhance biodiversity in line with the National Biodiversity Strategy and its targets</li> <li>To protect, maintain and conserve natural capital</li> </ul>
Population and Human Health	РНН	Improve quality of life for all ages and abilities based on high-quality, serviced, well connected and sustainable residential, working, educational and recreational environments	<ul> <li>Promote economic growth to encourage retention of working age population and funding of sustainable development and environmental protection and management</li> <li>Ensure that existing population and planned growth is matched with the required public infrastructure and the required services</li> <li>Safeguard citizens from environment-related pressures and risks to health and well-being</li> </ul>
Soil (and Land)	S	Ensure the long- term sustainable management of land	<ul> <li>Protect soils against pollution, and prevent degradation of the soil resource</li> <li>Promote the sustainable use of infill and brownfield sites over the use of greenfield</li> <li>Safeguard areas of prime agricultural land and designated geological sites</li> </ul>
Water	W	Protection, improvement and sustainable management of the water resource	<ul> <li>Ensure that the status of water bodies is protected, maintained and improved in line with the requirements of the Water Framework Directive</li> <li>Ensure water resources are sustainably managed to deliver proposed regional and County growth targets in the context of existing and projected water supply and wastewater capacity constraints ensuring the protection of receiving environments</li> <li>Avoid inappropriate zoning and development in areas at risk of flooding and areas that are vulnerable to current and future erosion</li> <li>Integrate sustainable water management solutions (such as SuDS, porous surfacing and green roofs) into development proposals</li> </ul>

		SEA Environment	al Report Appendix III: Non-Technical Summary
Environmental	SEO	Guiding	Strategic Environmental Objectives
Component	Code	Principle	
Material Assets	MA	Sustainable and efficient use of natural resources	<ul> <li>Optimise existing infrastructure and provide new infrastructure to match population distribution proposals - this includes transport infrastructure</li> <li>Ensure access to affordable, reliable, sustainable and modern energy for all which encourages a broad energy generation mix to ensure security of supply – wind, solar, hydro, biomass, energy from waste and traditional fossil fuels</li> <li>Promote the circular economy, reduce waste, and increase energy efficiencies</li> <li>Ensure there is adequate sewerage and drainage infrastructure in place to support new development</li> <li>Reduce the energy demand from the transport sector and support moves to electrification of road and rail transport modes</li> <li>Encourage the transition to a zero-carbon economy by facilitating the development of a grid infrastructure to support renewables and international connectivity. Reduce the average energy consumption per capita including promoting energy efficient buildings, retrofitting, smartbuildings, cities and grids</li> </ul>
Air	A	Support clean air policies that reduce the impact of air pollution on the environment and public health	<ul> <li>To avoid, prevent or reduce harmful effects on human health and the environment as a whole resulting from emissions to air from all sectors with particular reference to emissions from transport, residential heating, industry and agriculture</li> <li>Maintain and promote continuing improvement in air quality through the reduction of emissions and promotion of renewable energy and energy efficiency</li> <li>Promote continuing improvement in air quality</li> <li>Reduction of emissions of sulphur dioxide, nitrogen oxides, volatile organic compounds, ammonia and fine particulate matter which are responsible for acidification, eutrophication and ground-level ozone pollution</li> <li>Meet Air Quality Directive standards for the protection of human health — Air Quality Directive</li> <li>Significantly decrease noise pollution and move closer to WHO recommended levels</li> </ul>
Climatic Factors	С	Achieving transition to a competitive, low carbon, climateresilient economy that is cognisant of environmental impacts	To minimise emissions of greenhouse gasses Integrate sustainable design solutions into infrastructure (e.g. energy efficient buildings; green infrastructure) Contribute towards the reduction of greenhouse gas emissions in line with national targets Promote development resilient to the effects of climate change Promote the use of renewable energy, energy efficient development and increased use of public transport
Cultural Heritage	СН	Safeguard cultural heritage features and their settings through responsible design and positioning of development	
Landscape	L	Protect and enhance the landscape character	To implement the Plan's framework for identification, assessment, protection, management and planning of landscapes having regard to the European Landscape Convention

## **Section 4** Alternatives

### 4.1 Introduction

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

Alternatives for the Plan are identified and assessed under a number of types as summarised below. The Proposed Material Alterations do not significantly affect the strategic alternatives for the Draft Plan.

## 4.2 Limitations in Available Alternatives

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

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

## 4.3 Alternatives Description and Assessment Summary

## 4.3.1 Type 1: Alternatives Already Considered

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

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

Galway County Council in preparing a Draft Plan for public display developed the following alternatives for land use zoning in Gort (there are various alternative components under each heading):

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

- Gort to reach population allocation, resulting in balanced orderly development and implementation of the core strategy as contained in Chapter 2 of the Galway County Development Plan 2022-2028.
- This alternative involves preparing the Plan using a Serviced/Serviceable Land and Infrastructure
  Assessment approach. Methodologies for this approach are set out in higher level documents,
  including the National Planning Framework and the 2013 Local Area Plan Guidelines for Planning
  Authorities.
- The infrastructure required to be in place to achieve the growth targets is already in place or planned.
- Residential Development to take place on Residential Phase 1 and Residential Infill lands over the lifetime of the Plan, with 30% expected within the existing built-up footprint.
- Community development facilities to be developed in tandem with economic and residential growth.
- Town Centre developments would be developed in a planned and coordinated manner focused within the town centre.
- Industry would occur in the periphery close to existing infrastructure.

- Opportunity sites identified with clear design and proposed uses identified.
- Open Space/Recreation and Amenity Lands would be preserved.

#### Type 2 (ii): "Less Consolidated, Less Compact"

- Gort to reach population allocation, resulting in balanced orderly development and implementation of the core strategy as contained in the Galway County Development Plan 2022-2024.
- This alternative involves preparing the Plan while not using the Serviced Land and Infrastructure Assessment approach.
- Additional infrastructure would be required to accommodate sporadic development, more than
  would be required for Alternative 1 'More Consolidated Development' and some development
  may have to be serviced by private waste water treatment systems, which would have to be
  properly maintained.
- Residential Development to take place on Residential Phase 1, Residential Infill, Residential Phase 2 and certain peripheral, outer fringe lands (beyond the existing LAP boundary) over the lifetime of the Plan, with 30% less likely to be achieved within the existing built-up footprint (in comparison with Type 2 (i)).
- Industry would occur at locations including those close to residential development.
- Creation of commercial/social centres throughout the Plan area and associated dispersal of Town Centre, commercial development and local services.
- Town centre development would be sporadic and uncoordinated around the Town centre zonings.
- Opportunity sites are identified but no clear guidance on the design parameters or uses identified.

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

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

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

The development of the Town Centre would be more compact and sustainable under this scenario and would support the longer-term viability of the settlement. 30% of Residential units would be expected within the existing built-up footprint.

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

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

#### Alternative Type 2 (ii): "Less Consolidated, Less Compact"

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

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

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

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

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

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

## 4.3.3 Type 3: Transport Alternatives

A Local Transport Plan would assist in placing sustainable transport considerations to the forefront of land use planning decisions in the formulation of the Draft Plan. It would examine existing and proposed transport infrastructure for all modes of transport, including walking and cycling, and would provide some insight into existing transport patterns and constraints, facilitating the integration of land use and transport provisions.

- Local Transport Plan Alternative Type 3i: Inform the Plan with a Local Transport Plan, which focuses on delivering travel solutions that support moving people from the private car to more sustainable modes.
- Local Transport Plan Alternative Type 3ii: Do not inform the Plan with a Local Transport Plan, which focuses on delivering travel solutions that support moving people from the private car to more sustainable modes, relying solely on existing provisions, including those of the County Development Plans.

Informing the Plan with a Local Transport Plan, which focuses on delivering travel solutions that support moving people from the private car to more sustainable modes, (**Transport Alternative Type 3i**) would provide a more coordinated and more orderly provision of transport infrastructure and services, with delivery of projects, and associated benefit with respect to sustainable mobility and compact development, more likely. This approach would be more likely to improve the potential for meeting important objectives relating to emissions and energy use. Potentially adverse impacts on environmental components including ecology and water would need to be adequately mitigated at project level.

Transport Alternative 2i would:

- Support greater alignment between and integration of land use planning and transport planning.
- Ensure the assessment of transport demand and its associated impact informs the scale of development proposals, including location, density, required transport infrastructure etc.
- Facilitate a greater shift towards a more sustainable, healthy, and low carbon-built environment.
- Prioritise of active travel measures and considerations in the formulation of development proposals, including the consideration of suitable land for development.
- Promote and encourage a modal shift from the private car to walking and cycling, particularly for short to medium distance trips.
- Prioritise walking, cycling and public transport accessibility.
- Result in improvements in the built environment for the safety and security of those walking and cycling.
- Potentially reduce traffic congestion at peak traffic times, improving road network reliability.

Alternative 3i would be more likely to result in more connected and accessible built environments, with associated positive benefits for the health and wellbeing of local communities. Alternative 3i would contribute to the transition of the Plan area to a more low-carbon, climate resilient and healthy urban

environment, with reduced car dependency and an increase in sustainable travel such as walking and cycling.

Not informing the Plan with a Local Transport Plan, which focuses on delivering travel solutions that support moving people from the private car to more sustainable modes, (**Transport Alternative Type 3ii**) would provide a less coordinated and less orderly provision of transport infrastructure and services, with delivery of projects, and associated benefit with respect to sustainable mobility and compact development, less likely. This approach would be less likely to improve the potential for meeting important objectives relating to emissions and energy use. Potentially adverse impacts arising from more coherently planned transport developments on environmental components, including ecology and water, could be mitigated at both Plan and project level.

#### Transport Alternative 3ii would:

- Increase the potential for land use planning and developments aspects of the Plan to be considered in isolation of transport planning considerations.
- Mean that the assessment of existing traffic, transport, and movement conditions within the Plan area would not be taken into account in the formulation of policies and objectives.
- Undermine ability to plan for efficient movement of people and services within the Plan area.
- Limit the ability and scope to plan for required transport interventions in the Plan area.
- Not inform site specific transport assessment for development proposals with a Local Transport Plan
- Reduce support for modal shift from private car travel to active travel, including walking and cycling.

There would be greater potential for the existing pattern of car dependency to continue and increase under Alternative 3ii. Alternative 3ii would undermine policies and objectives supporting climate action and the transition to a more low-carbon urban environment. There would be potential for negative impacts on the health and wellbeing of local communities due to absence of measures for targeted active travel infrastructure.

#### Selected Alternative: Alternative Type 3i

## 4.4 Reasons for Choosing the Selected Alternative in light of Other Reasonable Alternatives Considered

Selected alternatives for the Draft Plan, to which the Proposed Material Alterations relate, from each of the types of alternatives that emerged from the planning/SEA process are indicated above.

Alternatives were selected for the Draft Plan having regard to both:

- 1. The environmental effects which are identified by the SEA and are summarised above; and
- 2. Planning including social and economic effects that also were considered.

## Section 5 Summary of Effects arising from the Proposed Material Alterations

A summary of the likely significant environmental effects arising from the Proposed Material Amendments that were subject to SEA is provided on Table 5.1.

Furthermore, Appropriate Assessment (AA) Screening and Stage 2 AA are being undertaken alongside the preparation of the Plan. The requirement for AA is provided under the EU Habitats Directive (Directive 1992/43/EEC). The conclusion of the Stage 2 AA for the Draft Local Area Plan are in alignment with no adverse effects on the integrity of any European site as a result of the implementation of the LAP.

The Proposed Material Alterations to the Local Area Plan have been screened for the need to undertake AA. Taking into the measures that have been already integrated into the Draft Plan and those that are already in force through the County Development Plan, the AA process for the Proposed Material Alterations has demonstrated that the implementation of Proposed Material Alterations will not result in any likely significant effect on any European site. Consequently, Stage 2 AA is not required for any Proposed Material Alteration. The findings of the Screening for AA process is provided in a Screening for AA Report that accompanies the Proposed Material Alterations and this SEA Environmental Report.

Strategic Flood Risk Assessment (SFRA) is being undertaken as part of the preparation of the Local Area Plan and associated Proposed Material Alterations. Requirements in relation to SFRA are provided under 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (Department of Environment and Office of Public Works, 2009) and associated Department of the Environment, Community and Local Government Circular PL2/2014. The SFRA has informed both the land use zoning and the written provisions of the Local Area Plan, to which the Proposed Material Alterations relate.

### Table 5.1 Summary of Effects arising from Proposed Material Alterations that are subject to SEA

Proposed	Commentary				
Material Alterations No. <sup>22</sup>					
MA36	Proposed Material Alteration MA36 is to zone lands from outside the plan boundary to residential phase 2.				
	As has already been identified by the Executive's response to this submission:  • The Draft Local Area Plan is guided by National, Regional and Local Policy, the Planning Authority note that promoting sustainable compact growth of urban settlements a key priority throughout the tiered hierarchy of plans and this is supported by objective GSST 4 Compact Growth in the Draft Gort LAP. At this time, the Planning Authority consider that extending the boundary of the plan to include the site referenced in the submission, would be contrary to National Policy Objective NPO 3, Regional Policy Objective RPO 3.7.2 and Galway County Development Plan 2022-2028 Policy Objective CS2 Compact Growth.  • The Draft Gort LAP 2025-2031 was prepared in accordance with the Core Strategy of the Galway County Development Plan 2022-2028. As part of the review of the Local Area Plan, the quantum of Residential Phase 2 land was examined, and has been zoned accordingly, having regard to several of factors including promoting sequential development, connections to infrastructure and access to existing and planned services.  • Having regard to the location of the subject lands, the Planning Authority consider that zoning the lands Residential Phase 2 is not justified at this time.				
	As has already been identified in the SEA Environmental Report that was placed on public display alongside the Draft Plan:  Environmental considerations have been integrated into the Draft Plan's zoning through an interdisciplinary approach.  Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Western and Northern RSES and Galway County Development Plan 2022-2028.  The detailed Plan preparation process undertaken by the Planning Department combined with specialist input from the SFRA process facilitated zoning that helps to avoid inappropriate development being permitted in areas of high flood risk. Also taken into account were environmental sensitivities relating to ecology, cultural heritage, landscape and water.				
	This Proposed Alteration would not provide the most evidence-based framework for development and has the potential to undermine sustainable development and proper planning - with potential for associated unnecessary adverse environmental effects on various environmental components, including:				
MA37	<ul> <li>Conflict with efforts to maximise sustainable compact growth, sustainable mobility and a transition to a low carbon and climate resilient society (residual effects would occur); and</li> <li>Adverse impacts upon carbon emission reduction targets in line with local, national and European environmental objectives (residual effects would occur).</li> <li>Proposed Material Alteration MA37 is to zone lands from Business and Enterprise to Residential Phase 2.</li> </ul>				
	As has already been identified by the Executive's response to this submission:  Having regard to the strategic function of Gort as a Self-Sustaining Town, the location of the subject lands, which adjoins 'Industrial' zoned lands to the south, it is considered appropriate that the lands should be retained as Business and Enterprise.  Furthermore, concerns were raised by the Executive regarding the reduction of Business and Enterprise lands in a town that was designated a Self-Sustaining Town.				
	As has already been identified in the SEA Environmental Report that was placed on public display alongside the Draft Plan:  • Environmental considerations have been integrated into the Draft Plan's zoning through an interdisciplinary approach.  • Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Western and Northern RSES and Galway County Development Plan 2022-2028.  • The detailed Plan preparation process undertaken by the Planning Department combined with specialist input from the SFRA process facilitated zoning that helps to avoid inappropriate development being permitted in areas of high flood risk. Also taken into account were environmental sensitivities relating to ecology, cultural heritage, landscape and water.				
	This Proposed Alteration would not provide the most evidence-based framework for development and has the potential to undermine sustainable development and proper planning. The Alteration could potentially push demand for Business and Enterprise development to areas that are more environmentally sensitive, less well-connected to the town and less well-serviced, resulting in unnecessary adverse environmental effects on various environmental components, including:  • Adverse effects on ecology, ecological connectivity and non-designated habitats and species (residual effects would occur);  • Loss of an extent of soil function arising from the replacement of semi-natural land covers with artificial surfaces (residual effects would occur);  • Occurrence of visual impacts (residual effects would occur);  • Increased loadings on water bodies;				
	<ul> <li>Conflict with efforts to maximise sustainable compact growth, sustainable mobility and a transition to a low carbon and climate resilient society (residual effects would occur); and</li> <li>Adverse impacts upon carbon emission reduction targets in line with local, national and European environmental objectives (residual effects would occur).</li> </ul>				

 $<sup>^{\</sup>rm 22}$  For detail on Proposed Material Alterations please refer to Proposed Material Alterations document.

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Proposed	Commentary		
Material Alterations No. <sup>22</sup>			
MA38	Proposed Material Alteration MA38 is to zone lands from outside the plan boundary to residential phase 2.		
	As has already been identified by the Executive's response to this submission:  • The Draft Gort Local Area Plan 2025-2031 was prepared in accordance with the Core Strategy of the Galway County Development Plan 2022-2028. As part of the review of the Local Area Plan, the quantum of Residential Phase 2 land was examined, and has been zoned accordingly, having regard to several of factors including promoting sequential, compact growth, connections to infrastructure and access to existing and planned services.		
	As has already been identified in the SEA Environmental Report that was placed on public display alongside the Draft Plan:  Environmental considerations have been integrated into the Draft Plan's zoning through an interdisciplinary approach.  Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Western and Northern RSES and Galway County Development Plan 2022-2028.  The detailed Plan preparation process undertaken by the Planning Department combined with specialist input from the SFRA process facilitated zoning that helps to avoid inappropriate development being permitted in areas of high flood risk. Also taken into account were environmental sensitivities relating to ecology, cultural heritage, landscape and water.		
	This Proposed Alteration would not provide the most evidence-based framework for development and has the potential to undermine sustainable development and proper planning - with potential for associated unnecessary adverse environmental effects on various environmental components, including:		

## **Section 6** Mitigation and Monitoring Measures

## 6.1 Mitigation

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

Mitigation was achieved through:

- Strategic work undertaken by the Council to ensure evidence-based planning<sup>23</sup>;
- Considering alternatives for the Plan, to which the Proposed Material Alterations relate <sup>24</sup>;
- The integration of environmental considerations into zoning provisions of the Draft Local Area Plan, to which the Proposed Material Alterations relate <sup>25</sup>;
- The integration of individual SEA, AA and SFRA provisions into the text of the Local Area Plan, to which the Proposed Material Alterations relate; and
- The integration of individual provisions into the text of the existing, already in force, County Development Plan.

## 6.2 Monitoring

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

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

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

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<sup>&</sup>lt;sup>23</sup> Far in advance of the placing of the Draft Plan on public display, Galway County Council undertook various works in order to inform the preparation of the Plan.

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

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

<sup>&</sup>lt;sup>24</sup> Although strategic alternatives in relation to the content of the Plan were significantly limited for the Plan (see Section 4), as part of the Plan preparation/SEA process alternatives for the Plan were considered. These alternatives were assessed by the SEA process and the findings of this assessment informed the selection of alternatives for the Plan, facilitating an informed choice with respect to the type of Plan that was prepared and placed on public display.

<sup>&</sup>lt;sup>25</sup> Environmental considerations, including those relating to ecology, cultural heritage, landscape and water, were integrated into the Local Area Plan's zoning through an interdisciplinary approach which was informed by the environmental considerations identified by the SEA, AA and SFRA processes.

SEA Environmental Report Appendix III: Non-Technical Summary **Table 6.1 Indicators, Targets, Sources and Remedial Action** 

Environmental	SEO Code	Indicators	Targets
Component			
Biodiversity, Flora and Fauna	BFF	Condition of European sites	<ul> <li>Require all local level land use plans to include ecosystem services and green/blue infrastructure provisions and to have regard to the required targets in relation to the conservation of European sites, other nature conservation sites, ecological networks, and protected species</li> <li>Confirmation of compliance with Plan provisions relating to the protection of European Sites and sustaining resources</li> </ul>
			Implement and review, as relevant, the Galway County Heritage and Biodiversity Plan 2024-2030
		<ul> <li>Number of spatial plans that have included ecosystem services content, mapping and policy to protect ecosystem services when their relevant plans are either revised or drafted</li> </ul>	<ul> <li>Require all local level land use plans to include ecosystem services and green/blue infrastructure provisions and to have regard to the required targets in relation to the conservation of European sites, other nature conservation sites, ecological networks, and protected species</li> <li>Implement and review, as relevant, the Galway County Heritage and Biodiversity Plan 2024-2030</li> </ul>
		SEAs and AAs as relevant for new Council policies, plans, programmes etc.	Screen for and undertake SEA and AA as relevant for new Council policies, plans, programmes etc.
		Status of water bodies	Included under Water below
		<ul> <li>Compliance of planning permissions with Plan measures providing for the protection of Biodiversity and flora and fauna – see County Development Plan Chapter 10 "Natural Heritage, Biodiversity and Green Infrastructure"</li> </ul>	• For planning permission to be only granted when applications demonstrate that they comply with all Plan measures providing for the protection of biodiversity and flora and fauna – see County Development Plan Chapter 10 "Natural Heritage, Biodiversity and Green Infrastructure"
Population and Human Health	PHH	Implementation of Plan measures relating to the promotion of economic growth as provided for by County Development Plan Chapter 9 "Economic, Enterprise and Retail"	Progress in successfully implementing Plan measures relating to the promotion of economic growth as provided for by County Development Plan Chapter 9 "Economic, Enterprise and Retail"
		<ul> <li>Number of spatial concentrations of health problems arising from environmental factors resulting from development permitted under the Plan</li> </ul>	• No spatial concentrations of health problems arising from environmental factors as a result of implementing the Plan
		Proportion of people reporting regular cycling / walking to school and work above previous CSO figures	<ul> <li>Increase in the proportion of people reporting regular cycling / walking to school and work above previous CSO figures</li> <li>Progress in successfully implementing Plan measures relating to active travel</li> </ul>
		<ul> <li>Number of spatial plans that include specific green infrastructure mapping</li> </ul>	Require all local level land use plans to include specific green infrastructure mapping
Soil (and Land)	S	Proportion of population growth occurring on infill and brownfield lands compared to greenfield (also relevant to Material Assets)	<ul> <li>Maintain built surface cover nationally to below the EU average of 4% as per the NPF</li> <li>In accordance with National Policy Objectives 3c of the National Planning Framework, a minimum of 30% of the housing growth targeted in any settlement is to be delivered within the existing built-up footprint of the settlement</li> <li>To map brownfield and infill land parcels</li> </ul>
		Instances where contaminated material generated from brownfield and infill must be disposed of	Dispose of contaminated material in compliance with EPA guidance and waste management requirements
		Environmental assessments and AAs as relevant for applications for brownfield and infill development prior to planning permission	Screen for and undertake environmental assessments and AA as relevant for applications for brownfield and infill development prior to planning permission
Water	W	Status of water bodies as reported by the EPA Water Monitoring Programme for the WFD	<ul> <li>Subject to exemptions provided for by Article 4 of the Water Framework Directive, not to cause deterioration in the status of any surface water or affect the ability of any surface water to achieve 'good status'</li> <li>Implementation of the objectives of the River Basin Management Plan</li> </ul>
		Number of incompatible developments permitted within flood risk areas	Minimise developments granted permission on lands which pose - or are likely to pose in the future - a significant flood risk
Material Assets	MA	<ul> <li>Programmed delivery of Uisce Éireann infrastructure for all key growth towns in line with Uisce Éireann Investment Plan and prioritisation programme to ensure</li> </ul>	<ul> <li>All new developments granted permission to be connected to and adequately and appropriately served by waste water treatment over the lifetime of the Plan</li> <li>Where septic tanks are proposed, for planning permission to be only granted when applications demonstrate that</li> </ul>

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Environmental Component	SEO Code	Indicators	Targets
·		sustainable growth can be accommodated  Number of new developments granted permission which can be adequately and appropriately served with waste water treatment over the lifetime of the Plan	the outfall from the septic tank will not – in-combination with other septic tanks – contribute towards any surface or ground water body not meeting the objective of good status under the Water Framework Directive  Facilitate, as appropriate, Uisce Éireann in developing water and wastewater infrastructure  See also targets relating to greenfield and brownfield development of land under Soil and broadband under Population and Human Health
		Proportion of people reporting regular cycling / walking to school and work above previous CSO figures	<ul> <li>Increase in the proportion of people reporting regular cycling / walking to school and work above previous CSO figures</li> <li>Progress in successfully implementing Plan measures relating to active travel</li> </ul>
Air	A	<ul> <li>Proportion of journeys made by private fossil fuel-based car compared to previous levels</li> <li>NO<sub>2</sub> (Nitrogen Dioxide), PM10 (particulate matter with diameter of 10 microns or less) and O<sub>3</sub> (Ozone) as part of Ambient Air Quality Monitoring</li> </ul>	Decrease in proportion of journeys made by car compared to previous levels     Improvement in Air Quality trends, particularly in relation to transport related emissions     Progress in successfully implementing Plan measures relating to sustainable mobility and travel
Climatic Factors	С	Implementation of Plan measures relating to climate reduction targets	• For review of progress on implementing Plan objectives to demonstrate successful implementation of measures relating to climate reduction targets
		A competitive, low-carbon, climate-resilient and environmentally sustainable economy	• Contribute towards transition to a competitive, low-carbon, climate-resilient and environmentally sustainable economy by 2050
		Share of renewable energy in transport	<ul> <li>Contribute towards the National Energy and Climate Plan 2021-2030 sectoral target for transport (RES-T) of 14%, by 2030 (this may be increased following a provisional European agreement on 30 March 2023 for a binding overall RES target of at least 42.5% by 2030)</li> </ul>
		Greenhouse gas emissions	• Contribute towards the target of aggregate reduction in carbon dioxide (CO <sub>2</sub> ) emissions of at least 51% (compared to 1990 levels) by 2030 (helping to set Ireland on a path to reach net-zero emissions by 2050)
		Energy consumption, the uptake of renewable options and solid fuels for residential heating	• To promote reduced energy consumption and support the uptake of renewable options and a move away from solid fuels for residential heating
		Proportion of journeys made by private fossil fuel-based car compared to previous levels	<ul> <li>Decrease in the proportion of journeys made by residents of the settlement using private fossil fuel-based car compared to previous levels</li> <li>Progress in successfully implementing Plan measures relating to sustainable mobility and travel</li> </ul>
		Proportion of people reporting regular cycling / walking to school and work above previous CSO figures	<ul> <li>Increase in the proportion of people reporting regular cycling / walking to school and work above previous CSO figures</li> <li>Progress in successfully implementing Plan measures relating to active travel</li> </ul>
Cultural Heritage	СН	Percentage of entries to the Record of Monuments and Places, and the context these entries within the surrounding landscape where relevant, protected from adverse effects resulting from development which is granted permission under the Plan	<ul> <li>Protect entries to the Record of Monuments and Places, and the context of these entries within the surrounding landscape where relevant, from adverse effects resulting from development which is granted permission under the Plan</li> </ul>
		Percentage of entries to the Record of Protected Structures and Architectural Conservation Areas and their context protected from significant adverse effects arising from new development granted permission under the Plan	Protect entries to the Record of Protected Structures and Architectural Conservation Areas and their context from significant adverse effects arising from new development granted permission under the Plan
Landscape	L	Number of developments permitted that result in avoidable adverse visual impacts on the landscape, especially with regard to landscape and amenity designations included in Land Use Plans, resulting from development which is granted permission under the Plan	No developments permitted which result in avoidable adverse visual impacts on the landscape, especially with regard to landscape and amenity designations included in Land Use Plans, resulting from development which is granted permission under the Plan