

STRATEGIC ENVIRONMENTAL ASSESSMENT

TO COMPLY WITH SECTION 20 OF THE PLANNING AND DEVELOPMENT ACTS

FOR THE
**PROPOSED ALTERATION AND PROPOSED MATERIAL
ALTERATION**

TO THE
PROPOSED AMENDMENT

TO THE
GAELTACHT LOCAL AREA PLAN 2008-2014

for: Galway County Council

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Section 1 Introduction and Background

1.1 Introduction

Galway County Council has prepared a Proposed Amendment to the Gaeltacht Local Area Plan (LAP) 2008-2014 under Section 19 and 20 of the Planning and Development Act 2000 (as amended). A proposed alteration and a proposed material alteration were agreed upon by the Elected Members.

The Proposed Amendment was subject to Strategic Environmental Assessment (SEA) and a SEA Environmental Report was prepared under Article 8 (14B) of the Planning and Development (SEA) Regulations 2004 (SI No. 436 of 2004) taking into account submissions made by two environmental authorities (the Environmental Protection Agency and the Department of Arts, Heritage and the Gaeltacht).

The SEA found that the Proposed Amendment will further contribute towards the protection and management of the environment that is already provided for by the provisions of the existing Plan and higher level strategic actions relating to the protection of the environment and that significant adverse effects of implementing the Proposed Amendment are not envisaged as being likely to occur.

In addition:

- A Stage 2 Appropriate Assessment (AA), as required by the Habitats Directive, was undertaken on the Proposed Amendment and it found that the Amendment will not have a significant adverse effect on the integrity of European sites that form part of the Natura 2000 network.
- A Stage 2 Strategic Flood Risk Assessment (SFRA) was undertaken to inform the Proposed Amendment and the recommendations included in this document were integrated into the Proposed Amendment.

1.2 Legislative Context

Under Section 20 of the Planning and Development Acts 2000-2010, the Council is required to determine if a SEA is required to be carried out as respects one or more than one proposed Material Alteration of the Proposed Amendment that were placed on public display.

1.3 Content of this document and the SEA Environmental Report for Proposed Amendment No. 1

This report has been prepared with the objective of identifying and describing the likely significant environmental effects of implementing the Proposed Alteration and Material Alteration.

Additional information on the topics listed on Table 1 below (as taken from Schedule 2B of the SEA Regulations) may be obtained from the SEA Environmental Report for Proposed Amendment No. 1 to the Gaeltacht Local Area Plan 2008-2014.

Topic (as taken from Schedule 2B of the SEA Regulations)	Corresponding Section(s) of the SEA Environmental Report for Proposed Amendment No. 1	Relevant Section(s) of this document
(A) Outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes	Sections 2, 5, 6 and 7	See also the content of the Proposed Alteration and Proposed Material Alteration under Section 1.4
(B) Description of relevant aspects of the current state of the environment and the evolution of that environment without implementation of the plan or programme	Section 4 ¹	See also Section 2.2 and 3.2.
(C) Description of the environmental characteristics of areas likely to be significantly affected	Section 4 ²	See also Section 2.2 and 3.2.
(D) Identification of any existing environmental problems which are relevant to the plan or programme, particularly those relating to European protected sites	Section 4	See also Section 2.2.
(E) List environmental protection objectives, established at international, EU or national level, which are relevant to the plan or programme and describe how those objectives and any environmental considerations have been taken into account when preparing the Plan	Sections 2 and 5 ³	See also Section 2.2.
(F) Describe the likely significant effects on the environment	Section 7	See also Section 2.2 and 3.2.
(G) Describe any measures envisaged to prevent, reduce and as fully as possible offset any significant adverse environmental effects of implementing the plan or programme	Section 8 and Appendix II ⁴	See also Section 2.2 and 3.2.
(H) Give an outline of the reasons for selecting the alternatives considered, and a description of how the assessment was undertaken (including any difficulties)	Section 6 ⁵	-
(I) A description of proposed monitoring measures	Section 9 ⁶	-
(J) A non-technical summary of the above information	Non-Technical Summary (Appendix I)	-
(K) Interrelationships between each environmental topic	Addressed as it arises within each Section	See also Section 2.2 and 3.2.

Table 1 Topics listed in Schedule 2B of the SEA Regulations

¹ Note that the environmental baseline and its evolution, including that which relates to the Proposed Material Alteration subject lands, are described in this section.

² Note that the environmental baseline, including that which relates to the Proposed Material Alteration subject lands, is described in this section.

³ Note that environmental protection objectives, including those which relate to the Proposed Material Alteration subject lands, are described in this section.

⁴ Note that mitigation measures, including those which relate to the Proposed Material Alteration subject lands, are described in this section and appendix.

⁵ Note that alternatives, including those which relate to the Proposed Material Alteration subject lands and uses ('Recreation and Amenity' and 'Residential'), are described in this section.

⁶ Note that monitoring measures, including those which relate to the Proposed Material Alteration subject lands, are described in this section.

1.4 Content of the Proposed Alteration and Proposed Material Alteration

1.4.1 Proposed Alteration

Alterations proposed to Appendix 2 of the Gaeltacht LAP (as amended) to reinstate the following note under the Zoning Matrix:

Exclusively residential proposals in the village centre (Mixed. Dev) zone will not normally be permitted.

Alterations proposed to Section 6.2 and Section 7.2 of the Gaeltacht LAP (as amended) as follows:

~~Residential Density Guidelines 1999~~ *Sustainable Residential Development in Urban Areas Guidelines 2009.*

1.4.2 Proposed Material Alteration

Alteration proposed to the land use zoning of the submission lands and additional adjoining lands to the north from 'Recreation and Amenity' zoning to 'Residential (Phase 2)' zoning as per the current residential zoning in Map 7.1 An Spidéal Land Use Zoning.

Figure 1 shows the Land Use Zoning Map 7.1 from the Proposed Amendment.

Figure 2 shows the Land Use Zoning Map 7.1 for Material Alteration No. 2.

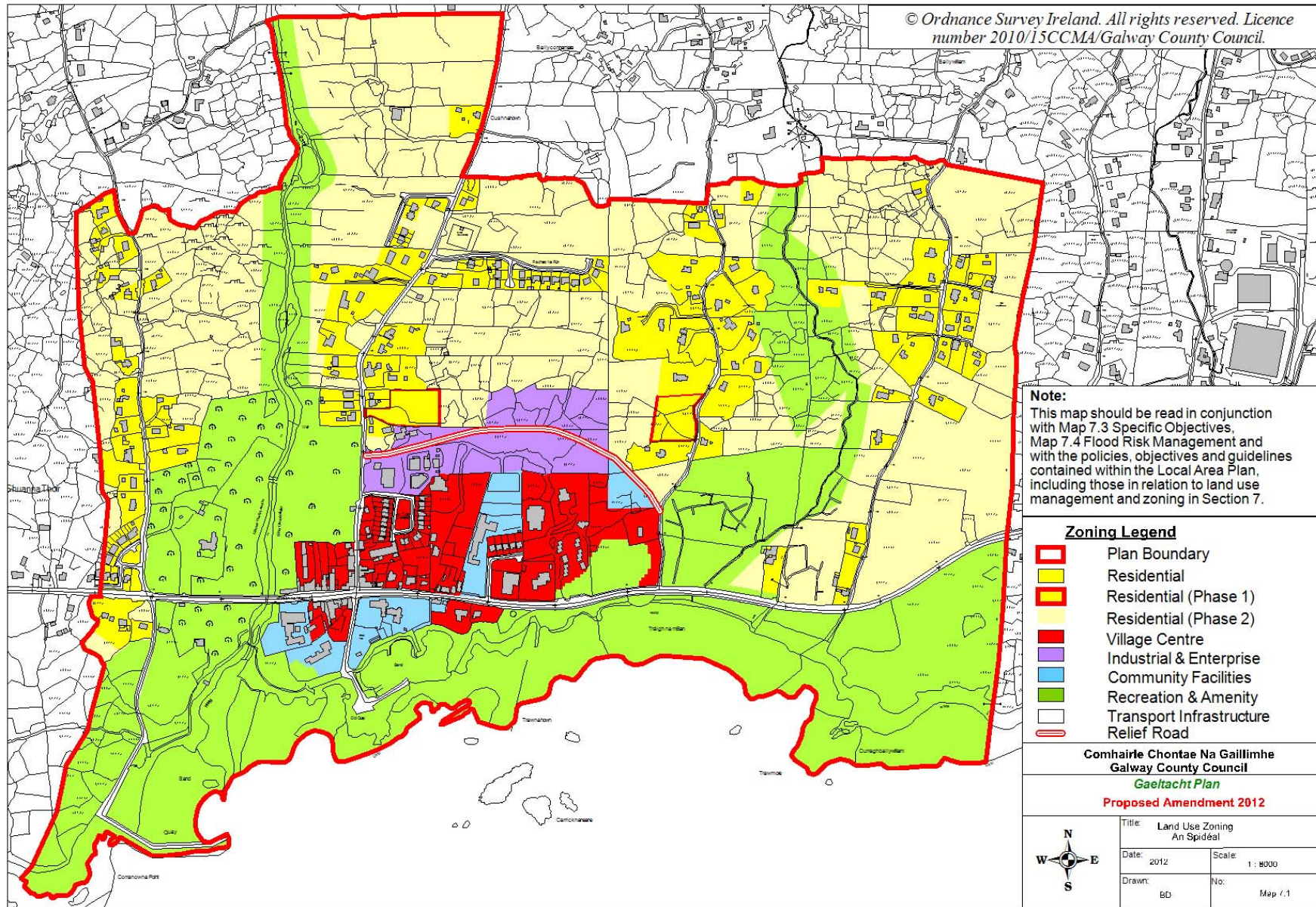


Figure 1 Land Use Zoning Map 7.1 from the Proposed Amendment

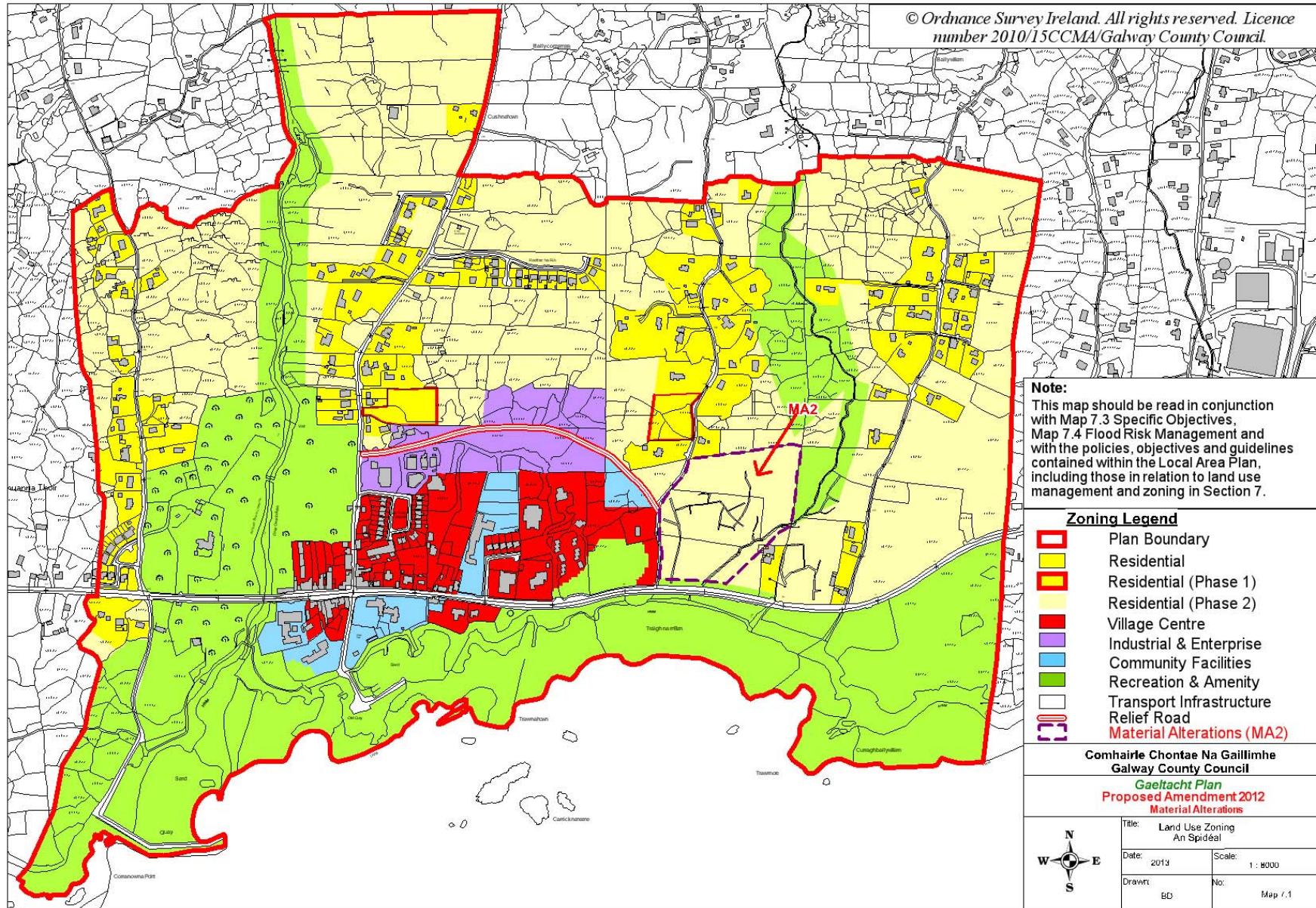


Figure 2 Land Use Zoning Map 7.1 for Material Alteration

Section 2 Determining whether SEA is required

2.1 Introduction

In order to determine whether or not the implementation of the alterations would be likely to have significant effects on the environment, the criteria set out in Schedule 2A of the SEA Regulations '*Criteria for determining whether a plan is likely to have significant effects on the environment*', as amended, were considered. It is only significant environmental effects arising from the Proposed Alteration and Proposed Material Alteration to the Proposed Amendment which are considered; the existing Gaeltacht Local Area Plan (LAP) 2008-2014 has undergone full SEA as has the Proposed Amendment.

2.2 Schedule 2A: Part 1

1. *The characteristics of the plan having regard, in particular, to: the degree to which the plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources*

The Proposed Alteration was determined as not being likely to result in significant environmental effects and consequently does not warrant further consideration. This alteration provides for a note to be added to the LAP Zoning Matrix and for references to government guidelines to be updated.

The Material Alteration relates to one area of land within the An Spidéal plan area and proposes that zoning is changed from 'Recreation and Amenity' to 'Residential (Phase 2)' on the An Spidéal Land Use Zoning Map (Map 7.1).

These lands are identified by the Stage 2 Strategic Flood Risk Assessment (SFRA) as being located within a flood risk area (Indicative Flood Zone A - where the probability of flooding from rivers and the sea is highest, greater than 1% Annual Exceedance Probability or 1 in 100 for river flooding or 0.5% Annual Exceedance Probability or 1 in 200 for coastal flooding).

The Office of Public Work's (OPW's) Preliminary Flood Risk Assessment (PFRA) Fluvial mapping covers the An Spidéal River which is located on these lands while the OPW PFRA Coastal Mapping covers part of a drain and surrounding area. The An Spidéal River that affects this location drains a steep, sizable catchment and there is a significant risk of flash flooding from the uplands.

During the site visit that was undertaken as part of the Stage 2 SFRA, the subject lands were examined from the adjacent roads. The topography was examined and the lands are lower than those upstream and drains have been dug into the land to increase drainage. Water draining from the lands is culverted under the R336 road.

In considering the PFRA mapping for the lands and field observations, the SFRA determined that, in the absence of new information, the lands are at risk from coastal (through culvert), fluvial and pluvial flooding and that the lands are located within Indicative Flood Zone A. The potential for culvert blockage is also noted.

The proposal by the Material Alteration (to change land use zoning from 'Recreation and Amenity' to 'Residential (Phase 2)') would change the opportunities for built development to be provided by the amended plan. The 'Recreation & Amenity' zoning as provided by the Proposed Amendment would allow for the consideration of community and recycling facilities; however, the 'Residential' zoning would allow for the provision of primarily residential development. Dwelling houses, as would be provided for, are considered as being 'Highly Vulnerable Development' by *The Planning System and Flood Risk Management - Guidelines for Planning Authorities* (Department of the Environment, Heritage and Local Government and Office of Public Works, 2009) and inappropriate for lands within Flood Zone A unless a Justification Test is passed. A Justification Test was undertaken for the Material Alteration which was not passed (see Appendix I).

Taking into account the issues outlined above, the change proposed by the Material Alteration would not be consistent with the Flood Risk Management Guidelines or the recommendations of the Stage 2 SFRA and would be likely to result in significant adverse impacts upon flood risk to human health and future residential developments.

It is noted that the Proposed Amendment (Environmental Objective O.F.R.M. 3⁷) allows for extensions from one zone into another which could facilitate appropriate development in certain areas subject to, inter alia, the submission and findings of a Site-Specific Flood Risk Assessment.

The proposal by the Material Alteration could increase the opportunities for built development to be provided by the amended plan. The 'Recreation and Amenity' zoning as provided by the Proposed Amendment includes objectives that could discourage built development ('to protect the natural riverside and built heritage') as well as objectives that could facilitate built development ('to allow for the consideration of community and recycling facilities'); however, the 'Residential' zoning primarily facilitates residential and associated development. The Material Alteration would therefore increase the likelihood of potential adverse impacts occurring with regard to environmental components including non-designated biodiversity, soil, ground and surface waters and the landscape; however, taking into account the extent of this change, and subject to the full implementation of the measures relating to environmental protection and management which are contained in the current LAP and Proposed Amendment, it is not likely that significant environmental effects will arise from this aspect of the Material Alteration.

Arising from the degree to which the LAP sets a framework for projects and other activities, the Material Alteration would be likely to result in significant environmental effects (significant adverse effects upon flood risk to human health and future residential developments).

2. The characteristics of the plan having regard, in particular, to: the degree to which the plan influences other plans, including those in a hierarchy

The LAP is situated at the bottom of the statutory land use strategic action hierarchy and includes a reference to an 'Integrated Action Area layout' under *Land Zoning and Indicative Development Guide (Attachment of Map 6.1)* for Carraroe as follows:

Residential Zone: Dwelling Houses

The terrain in which the village is set is open and rugged and forms part of landscape sensitivity class 3, which the County Development Plan ascribes to this part of Conamara, while the restrictions on rural housing in class 3 landscape will not apply within the village development boundary, housing development in the residential zone of the village will be required to settle into the contours of the landscape with as little intrusion as possible. Layouts to follow the principles of "Clustered House Design Guidelines" a support document of Galway County Development Plan. Individual clusters to contain not more than ten dwellings. In the case of more comprehensive developments an Integrated Action Area layout will be required. Clusters to show pedestrian linkages to village centre, where feasible. House types to be single storey and two storey, and should reflect village ethos. Plot Ratio to be in the range 0.20 to 0.25. Road carriageways to be surface dressed in local stone chippings with entrances to clusters being defined by natural stone flags or paviers. Footpaths and public lighting should also be appropriate to this terrain.

Arising from the degree to which the LAP influences other plans, the Material Alteration would not be likely to result in significant environmental effects.

⁷ In the case of lands transected by the outer boundary of Indicative Flood Zone A or B, where it can be demonstrated to the satisfaction of the Planning Authority that the outer boundary does not reflect local topographical and/or flood path conditions, the Planning Authority may consider the extension of a zone that is outside the indicative flood zone area into this area subject to the submission of a Site Specific Flood Risk Assessment and Justification Test as appropriate and the developer satisfying the Planning Authority and him or herself that the probability of flooding is appropriate to the development being proposed and will not increase flood risk elsewhere.

3. *The characteristics of the plan having regard, in particular, to: the relevance of the plan for the integration of environmental considerations in particular with a view to promoting sustainable development*

Environmental considerations have been integrated into and sustainable development has been contributed towards through the existing LAP. The Proposed Amendment will further contribute towards the integration of environmental considerations into and the contribution towards sustainable development that is already provided for by the LAP.

As detailed under **1.** above, the change proposed by the Material Alteration would not be consistent with the Flood Risk Management Guidelines and would be likely to result in significant adverse impacts upon flood risk to human health and future residential developments. Therefore, arising from the relevance of the LAP for the integration of environmental considerations in particular with a view to promoting sustainable development, the Material Alteration would be likely to result in significant environmental effects.

4. *The characteristics of the plan having regard, in particular, to: environmental problems relevant to the plan*

Environmental problems arise where there is a conflict between current environmental conditions and legislative targets.

As detailed under **1.** above, the change proposed by the Material Alteration would not be consistent with the Flood Risk Management Guidelines and would be likely to result in significant adverse impacts upon flood risk to human health and future residential developments. Therefore, arising from environmental problems relevant to the plan, the Material Alteration would be likely to result in significant environmental effects.

5. *The characteristics of the plan having regard, in particular, to: the relevance of the plan for the implementation of European Union legislation on the environment (e.g. plans linked to waste-management or water protection)*

The LAP relates to the land use sector and does not directly relate to other sectors such as agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications or tourism.

The EU Floods Directive (Directive 2007/ 60/ EC of the European Parliament and of the Council of 23 October 2007 on the assessment and management of flood risk: Official Journal L288/ 27-34.), recognises the importance of land use management and spatial planning as a key tool in flood risk management. As detailed under **1.** above, the change proposed by the Material Alteration would not be consistent with the Flood Risk Management Guidelines (these form part of Ireland's implementation of the Floods Directive) and would be likely to result in significant adverse impacts upon flood risk to human health and future residential developments.

Therefore, arising from the relevance of the plan for the implementation of European Union legislation on the environment combined with the implementation of the Flood Risk Management Guidelines, the Material Alteration would be likely to result in significant environmental effects.

2.3 Schedule 2A: Part 2

1. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to: the probability, duration, frequency and reversibility of the effects

The Material Alteration would not be consistent with the Flood Risk Management Guidelines and would be likely to result in significant adverse impacts upon flood risk to human health and future residential developments (see 1. under Section 2.2).

The area likely to be affected includes the subject lands which are located within Indicative Flood Zone A – where the probability of flooding from rivers and the sea is highest (greater than 1% Annual Exceedance Probability or 1 in 100 for river flooding or 0.5% Annual Exceedance Probability or 1 in 200 for coastal flooding).

Damage to property may be reversible. Monetary losses arising from damage to property may be reversible. Social effects arising from losses may be compensated for but may be irreversible. Loss of life is and certain impacts on health are irreversible.

2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to: the cumulative nature of the effects

Galway County Council is seeking to implement an approach to Flood Risk Management which is in compliance with the Flood Risk Management Guidelines and which avoids and minimises adverse effects upon flood risk to human health and development. Any effects occurring as a result of the Material Alteration would be in addition to any other effects occurring within the settlement, across the County and within the wider region.

3. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to: the transboundary nature of the effects

Not applicable.

4. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to: the risks to human health or the environment (e.g. due to accidents)

See response under 2. above.

5. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to: the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)

See response under 2. above.

6. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to: the value and vulnerability of the area likely to be affected due to:

a) special natural characteristics or cultural heritage;

Not applicable.

b) exceeded environmental quality standards or limit values, and;

Not applicable.

c) intensive land-use.

Not applicable.

7. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to: the effects on areas or landscapes which have a recognised national, European Union or international protection status

Not applicable.

2.4 Conclusion of Determination

The Proposed Alteration was determined as not being likely to result in significant environmental effects.

The change proposed by the Material Alteration was determined not to be consistent with the Flood Risk Management Guidelines and as being likely to result in significant adverse impacts upon flood risk to human health and future residential developments. Therefore full SEA is required for this Material Alteration.

In addition, it is noted that:

- An Appropriate Assessment Screening under the Habitats Directive has been undertaken on the Proposed and Material Alteration and it has found that a Stage 2 Appropriate Assessment is not required and that there will be no impacts on the Natura 2000 network.

Section 3 Full Strategic Environmental Assessment

3.1 Introduction

The detailed consideration of the Material Alteration and Schedule 2A of the SEA Regulations '*Criteria for determining whether a plan is likely to have significant effects on the environment*' (see Section 2 above) determined that full SEA is required for the Material Alteration. This assessment is presented below.

3.2 Full SEA

This section explains and details the likely significant environmental effects of implementing the Material Alteration. Some of the information used in the detail consideration provided Section 2 is reproduced for this purpose.

The Material Alteration subject lands are identified by the Stage 2 SFRA as being located within a flood risk area (Indicative Flood Zone A - where the probability of flooding from rivers and the sea is highest, greater than 1% Annual Exceedance Probability or 1 in 100 for river flooding or 0.5% Annual Exceedance Probability or 1 in 200 for coastal flooding).

The Office of Public Work's (OPW's) Preliminary Flood Risk Assessment (PFRA) Fluvial mapping covers the An Spidéal River which is located on these lands while the OPW PFRA Coastal Mapping covers part of a drain and surrounding area. The An Spidéal River that affects this location drains a steep, sizable catchment and there is a significant risk of flash flooding from the uplands.

During the site visit that was undertaken as part of the Stage 2 SFRA, the subject lands were examined from the adjacent roads. The topography was examined and the lands are lower than those upstream and drains have been dug into the land to increase drainage. Water draining from the lands is culverted under the R336 road.

In considering the PFRA mapping for the lands and field observations, the SFRA determined that, in the absence of new information, the lands are at risk from coastal (through culvert), fluvial and pluvial flooding and that the lands are located within Indicative Flood Zone A. The potential for culvert blockage is also noted.

The proposal by the Material Alteration (to change zoning from 'Recreation and Amenity' to 'Residential (Phase 2)') would change the opportunities for built development to be provided by the amended plan. The 'Recreation & Amenity' zoning as provided by the Proposed Amendment would allow for the consideration of community and recycling facilities; however, the 'Residential' zoning would allow for the provision of primarily residential development. Dwelling houses, as would be provided for, are considered as being 'Highly Vulnerable Development' by *The Planning System and Flood Risk Management - Guidelines for Planning Authorities* (Department of the Environment, Heritage and Local Government and Office of Public Works, 2009) and inappropriate for lands within Flood Zone A unless a Justification Test is passed. A Justification Test was undertaken for the Material Alteration which was not passed (see Appendix I).

Taking into account the issues outlined above, the change proposed by the Material Alteration would not be consistent with the Flood Risk Management Guidelines or the recommendations of the Stage 2 SFRA and would be likely to result in significant adverse impacts upon flood risk to human health and future residential developments. Potential effects that may occur as a result of flooding are expanded upon on Table 3 below.

Tangible Effects	Intangible Human and Other Effects
Damage to buildings (houses)	Loss of life
Damage to contents of buildings	Physical injury
Damage to new infrastructure e.g. roads	Increased stress
Loss of income	Physical and psychological trauma
Disruption of flow of employees to work causing knock on effects	Increase in flood related suicide
Enhanced rate of property deterioration and decay	Increase in ill health
Long term rot and damp	Homelessness
	Loss of uninsured possessions

Table 2 Potential effects that may occur as a result of flooding

It is noted that the Proposed Amendment (Environmental Objective O.F.R.M. 3⁸) allows for extensions from one zone into another which could facilitate appropriate development in certain areas subject to, inter alia, the submission and findings of a Site-Specific Flood Risk Assessment.

3.3 SEA Conclusion and Recommendation

The change proposed by the Material Alteration is not consistent with the Flood Risk Management Guidelines or the recommendations of the Stage 2 SFRA and would be likely to result in significant adverse effects upon flood risk to human health and future residential developments.

In order to comply with the Guidelines and minimise effects upon flood risk it is recommended that the zoning for the subject lands contained in the Proposed Amendment ('Recreation and Amenity') is adopted and not that contained within the Material Alteration ('Residential (Phase 2)').

⁸ In the case of lands transected by the outer boundary of Indicative Flood Zone A or B, where it can be demonstrated to the satisfaction of the Planning Authority that the outer boundary does not reflect local topographical and/or flood path conditions, the Planning Authority may consider the extension of a zone that is outside the indicative flood zone area into this area subject to the submission of a Site Specific Flood Risk Assessment and Justification Test as appropriate and the developer satisfying the Planning Authority and him or herself that the probability of flooding is appropriate to the development being proposed and will not increase flood risk elsewhere.

Appendix I: SFRA Justification Test for Proposed Material Alteration Lands

The Material Alteration (see Figure 2) relates to one area of land within the An Spidéal plan area and proposes that zoning is changed from 'Recreation and Amenity' to 'Residential (Phase 2)' on the An Spidéal Land Use Zoning Map (Map 7.1).

As this proposal concerns lands which are located within Indicative Flood Zone A (higher probability of flooding) and uses which are highly vulnerable to flooding, the Justification Test which is outlined in *The Planning System and Flood Risk Management - Guidelines for Planning Authorities* (Department of the Environment, Heritage and Local Government and Office of Public Works, 2009) would be required to be passed in order for the lands to be zoned in compliance with the Guidelines. To pass the Justification Test all of the criteria detailed on Table 3 would have to be passed:

Criteria	Determination with regard to the Material Alteration
1. The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.	Yes, An Spidéal is an urban settlement targeted for growth under the Galway County Development Plan.
2. The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	The zoning proposed by the Material Alteration is <u>not</u> required to achieve the proper planning and sustainable development of the urban settlement
Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	The zoning proposed by the Material Alteration is <u>not</u> essential to facilitate regeneration and/or expansion of the centre of the urban settlement
Comprises significant previously developed and/or under-utilised lands;	The zoning proposed by the Material Alteration does <u>not</u> contain previously developed and/or under-utilised lands
Is within or adjoining the core of an established or designated urban settlement;	The Material Alteration is not within or adjoining the core of the urban settlement
Will be essential in achieving compact and sustainable urban growth; and	The zoning proposed by the Material Alteration is <u>not</u> essential in achieving compact and sustainable urban growth.
There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	There are suitable alternative lands for the particular uses, in areas at lower risk of flooding within or adjoining the core of the urban settlement.
A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.	Strategic Flood Risk Assessment (SFRA) has been undertaken for the Proposed Amendment in accordance with 2009 <i>The Planning System and Flood Risk Management - Guidelines for Planning Authorities</i> Department of the Environment, Heritage and Local Government and Office of Public Works. A Stage 1 SFRA (flood risk identification) was undertaken in order to identify whether there may be any flooding or surface water management issues within the Gaeltacht area

	<p>(including An Spidéal) and consequently whether Stage 2 SFRA (initial flood risk assessment) should be proceeded to for the Proposed Amendment.</p> <p>A Stage 2 SFRA (initial flood risk assessment) was undertaken to:</p> <ul style="list-style-type: none"> • Confirm the sources of flooding that may affect the Gaeltacht area (including An Spidéal); • Appraise the adequacy of existing information as identified by the Stage 1 SFRA; and • Scope the extent of the risk of flooding through the preparation of indicative flood zone maps. <p>The SEA and SFRA have been integrated into the preparation of the Proposed Amendment at the appropriate level of detail. This is why the approach to date by Galway County Council has been to zone undeveloped areas identified as Indicative Flood Zone A or B as 'Recreation and Amenity'. The rezoning of lands identified as Flood Zone A proposed by the Material Alteration is not in compliance with the above approach.</p> <p>The proposed zoning would also set an undesirable precedent for the zoning of lands at risk of flooding for inappropriate uses.</p>
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Table 3 Justification Test for the Material Alteration

Conclusion

The subject lands are located within Indicative Flood Risk Zone A and do not pass the Justification Test outlined in the Guidelines. Therefore, the Material Alteration is not in compliance with the provisions of *The Planning System and Flood Risk Management - Guidelines for Planning Authorities* (Department of the Environment, Heritage and Local Government and Office of Public Works, 2009) or the recommendations of the Stage 2 Strategic Flood Risk Assessment (SFRA) which has been undertaken alongside the preparation of the Proposed Amendment.