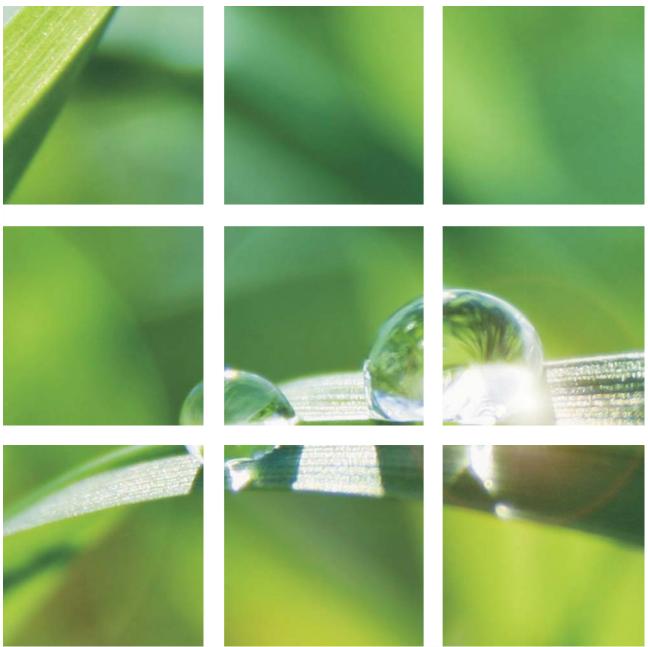


Gort Local Area Plan (2013 - 2019) Strategic Environmental Assessment Final Non-Technical Summary

August 2013



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Draft Gort Local Area Plan 2013-2019 Strategic Environmental Assessment Final Non-Technical Summary

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1 INTRODUCTION

1.1 BACKGROUND

Galway County Council is currently preparing a Local Area Plan (LAP) for Gort. This Local Area Plan (LAP) is a land use plan and overall strategy for the development of Gort over the period 2013-2019. The successful implementation of the Plan will have a positive impact on Gort ensuring that it develops in a proper and sustainable manner, and will also complement the implementation of the Galway County Development Plan 2009-2015.

A Strategic Environmental Assessment (SEA) Scoping Report was undertaken as the initial stage of the SEA process in January 2013. It presented, in consultation with key stakeholders, initial understandings of key environmental issues within the study area relating to the LAP. Submissions received were incorporated into the next phase of the SEA process - drafting of the Environmental Report (ER). The ER contains the findings of the assessment on the likely significant effects on the environment of the implementation of the LAP.

The Draft Gort LAP 2013-2019, SEA Environmental Report (ER) and Appropriate Assessment (AA) were subsequently placed on public display from 19th February to 2nd April 2013. In total, nine submissions were received and SEA comment was provided on each submission in order to inform the Manager's Report to the Elected Members of Galway County Council.

All nine submissions were outlined in a Manager's Report on the Draft LAP which was issued to the elected members of Galway County Council in May 2013. Following consideration of the Manager's Report on the Submissions on the Draft LAP, the Elected Members considered the adoption of the Draft Plan at the Council Meeting of 27th May 2013. The Elected Members made a number of Material Alterations to the proposed Draft Plan. As well as material alterations recommended in the Manager's Report one additional material alteration (proposed MA2) was made by the Elected Members which was not recommended in the Manager's Report. Material alterations to the Draft LAP included amendments to the text, amendments to zoning, amendments to objectives and new objectives.

The proposed alterations, together with the SEA/ER Report Addendum for the Material Alterations, the Addendum to the AA/NIR Report, the Amended Stage 2 SFRA as amended, were put on public display for a period of just over 4 weeks from 7th June 2013 to 5th July 2013. A Manager's Report on the submissions received regarding the proposed Material Alterations was presented to the Elected Members at a Council Meeting on 22nd July 2013. The members voted to accept all the Manager's recommendations including the rezoning of a portion of land (which was subject to proposed MA2) and identified in the Stage 2 SFRA as located within a high risk flood area) from proposed Town Centre/Commercial (C1) zoning to Open Space, Recreation and Amenity Zoning (OS), in compliance with the Flood Risk Management Guidelines 2009.

The Gort LAP was adopted on 22nd July 2013 by Galway County Council and this report is the Final SEA ER Non-Technical Summary. It summarises the Final SEA ER and is accompanied by the Final SEA ER, SEA Statement and a Natura Impact Report. New text in the Final SEA ER resulting from consultation is shown in red font, and is accompanied by a footnote when additional text was inserted following the consultation processes.

SEA is a key process that promotes sustainable development and highlights significant environmental issues within the planning regime. The purpose of SEA is to formally and systematically evaluate the likely significant effects of implementing a plan or programme, in this instance the Draft Gort LAP. SEA is an iterative process and has informed and influenced the preparation of the Draft LAP. The purpose of the Environmental Report is to identify, describe, and evaluate the likely significant effects on the environment of implementing the proposed Draft LAP and should be read in conjunction with the Draft LAP itself. Further detail on items outlined in this Non-Technical Summary can be found in the full SEA Environmental Report. The Environmental Report is not the SEA, rather it documents the SEA

process and is the key consultation document in the SEA process and facilitates interested parties to comment on the environmental issues associated with the Draft LAP.

1.2 GORT LAP AREA

Gort is an attractive market town in South County Galway. It is located within 32km of Galway City on the N18 National Primary Route to Limerick. The M18 motorway provides easier access to Limerick city and has improved access in the town. It is identified as a 'Key Town' in the Core Strategy for the County Galway, as set out under the Galway County Development Plan 2009-2015 as varied. The location of Gort in relation to Galway City is shown below.

The Core Strategy of the County Development Plan 2009-2015 has identified Gort as a 'Key Town' in the settlement hierarchy and has set a target population increase of 820 persons for Gort. In terms of population trends, according to the most recent 2011 CSO figure, the population of Gort was recorded as 2,636 persons. This represents a population decrease of 5.2% (146 persons) from the previous Census of 2006. It is recognised that the growth targets as set out in the Regional Planning Guidelines and the County Development Plan Core Strategy are ambitious in the current economic climate.

1.3 STRUCTURE OF THE DRAFT GORT LAP

Galway County Council is currently preparing a Draft Gort LAP 2013–2019 to replace the existing Gort LAP. The LAP is being prepared under the provisions of the Planning and Development Act 2000 (as amended) to develop and improve in a sustainable manner the environmental, social, economic and cultural assets of Gort. The Gort LAP (2013-2019) Administrative Boundary is shown in **Figure 1**.

The LAP will also provide the means by which the specific objectives and activities of the private and public sectors will be coordinated, to ensure that they are implemented in a mutually integrated, consistent, sustainable and supportive manner. It will promote and encourage development, conserve and protect the environment and make the best possible use of resources.

The Draft LAP is structured around a range of policies and supporting objectives that aim to promote the sustainable development of Gort over the plan period. It is underpinned by the following vision:

"be a sustainable, self-sufficient, vibrant, socially inclusive and innovative growth centre within the County, protecting and enhancing its attractive medieval character and natural environment, supporting an educated workforce, providing a range of supporting services/facilities/ amenities and with a high quality of life for the local community. This will be delivered through a managed and phased development strategy on appropriately zoned and serviced lands in a manner that is balanced and sustainable for Gort and the immediate environs that it serves."

Thereafter, a range of policies and objectives are provided under the following headings:

- Development Strategy
- Land Use Management
- Residential Development
- Social and Community Development
- Economic Development

- Transportation Infrastructure
- Utilities and Environmental Infrastructure
- Urban Design and Landscape
- Built Heritage and Cultural Heritage
- Natural Heritage and Biodiversity

A land use zoning map, a strategic objectives map and a land use matrix provide additional detail to the above policies and objectives.

2 METHODOLOGY

The SEA Directive requires that certain Plans and Programmes, which are likely to have a significant impact on the environment, be subject to the SEA process. The SEA process is broadly comprised of the steps listed in **Table 2.1**below.

SEA Step / Stage	Purpose	Status
Screening	This initial step identifies whether or not a particular plan would be likely to have significant environmental effects and would then require a SEA. Given the potential for environmental effects as a result of the Plan the LAP for Gort is subject to SEA.	Completed in October 2012
Scoping	This step helps to identify the range of environmental issues and the level of detail to be included in the Environmental Report, in consultation with the prescribed environmental authorities. Furthermore, submissions made by the public in relation to the preparation of the LAP at pre-draft stage helped to inform the scope of the SEA and Environmental Report.	Completed in January 2013
Environmental Assessment	Assessment of the likely significant impacts on the environment as a result of the Plan or Programme culminating in the production of an Environmental Report. In preparing this Environmental Report a Geographical Information System was established that mapped relevant environmental data on the town and where relevant on areas outside the town boundary. Available policies and legislation were also referred to.	Completed in February 2013
Consultation	Consultation on the draft Plan/Programme and associated Environmental Report.	Carried out at draft plan stage and when material alterations to the draft plan were proposed in March and June/July 2013.
SEA Statement	Identification of how environmental considerations and consultation have been integrated into the final Plan/Programme culminating in the production of an SEA Statement.	To be published with final adopted Plan in August 2013

Table 2.1: Steps Comprising the SEA Process

3 BASELINE ENVIRONMENT

3.1 INTRODUCTION

This chapter describes the principal environmental parameters that are of relevance to both the functional area of Gort and its environs. This section aims to describe the environmental context within which the LAP will operate and the constraints and targets that this context imposes on the LAP. The following sections summaries key environmental resources and issues for the Gort area.

3.2 POPULATION

The National Spatial Strategy sets out a national settlement structure which focuses on growing urban centres such as the identified gateways, the hubs and linked hubs and larger towns so that they reach a sufficient size or 'critical mass' in order to enhance economic competitiveness within the region. The *Regional Planning Guidelines for the West Region 2010-2022* set a target population of an additional 15,760 persons for County Galway for 2016.

The Core Strategy of the County Development Plan 2009-2015 has identified Gort as a 'Key Town' in the settlement hierarchy and has set a target population increase of 820 persons for Gort.

In terms of population trends, according to the most recent 2011 CSO figure, the population of Gort was recorded as2,636 persons (**Table 3.1**). This represents a population decrease of 5.2% (146 persons) from the previous Census of 2006. It is recognised that the growth targets as set out in the Regional Planning Guidelines and the County Development Plan Core Strategy are ambitious in the current economic climate.

Table 3.1: Population Trend for Gort for Census Periods 2002-2011

Population Census 2002	Population Census 2006	Population Census 2011
1,776	2,782	2,636

3.2.1 Existing Environmental Pressures / Problems

It is recognised that the population growth targets (an additional 820 persons by 2015) as set out in the Regional Planning Guidelines and the County Development Plan Core Strategy are ambitious in the current economic climate. Given this current economic climate it is considered that over the lifetime of the Plan the population of Gort will stay well within the population growth target.

This population growth target requires housing land of 15.77Ha, or 23.66Ha with 50% over-zoning, in order to accommodate residential development over the Plan period. Under the previous *Gort Local Area Plan 2006-2012*, there was over106.20Ha of undeveloped zoned residential land within the development boundary. The current Local Area Plan considers various development zoning and phasing options so as to comply with the Core Strategy and to ensure that suitable lands are brought forward for development during the Plan period.

The projected population for Gort presents problems for the Gort Wastewater Treatment Plant which is currently operating within capacity. If the projected population increase of 820 persons does occur then the WwTP will be operating within 469PE of its capacity. This presents potential adverse issues for water quality, water supply and nature conservation and therefore monitoring and mitigation with regard to the town's population is required.

3.3 BIODIVERSITY, FLORA AND FAUNA

3.3.1 Introduction

Designated ecological sites in close proximity to the LAP area are shown on **Figure 3A**, **Figure 3B and Figure 3C**. Special Areas of Conservation (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) - referred to as the Habitats Directive. 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 Special Protection Areas (SPAs) designated under the Conservation of Wild Birds Directive (79/409/EEC), form the Natura 2000 network.

Coole-Garryland cSAC/SPA/pNHA and Lough Cutra cSAC/SPA are located in close proximity to the plan boundary. The conservation objectives of Coole-Garryland cSAC/pNHA relates to a number of habitats including the aquatic habitat '[3150] Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation' for which good water quality (and quantity) is required. The conservation objectives of Lough Cutra cSAC relate specifically to Lesser Horseshoe Bat '[1303] *Rhinolophus hipposideros*' which might potentially forage in the Gort LAP requiring a mixture of seminatural habitats and stands of broadleaved trees. Coole-Garryland SPA is designated for its population of Whooper Swan, and Lough Cutra SPA is designated for its Cormorant population. Pollduagh Cave pNHA is designated for a Daubenton's Bat nursery roost. Protected sites within 15km of Gort and potential pathways from the Draft Plan area to the protected site are considered in the SEA Environmental Report. There are also a number of nationally designated sites of importance including Natural Heritage Areas (NHAs) and Proposed Natural Heritage Areas (pNHAs) within the plan area and within a 15km zone of influence of Gort (**Figure 3C**). These are described in detail in the Environmental Report and Natura 2000 sites are shown on **Figures 3A and 3B**.

An Appropriate Assessment Natura Impact Report was prepared in tandem to the SEA Environmental Report and it provides an assessment of the Natura 2000 sites within a 15km radius of the LAP. This report will form part of the final package of the SEA Environmental Report.

3.3.2 Existing Environmental Pressures / Problems

Gort and its environs has high quality ecological sites at an international, national and local level. Existing pressures in the town relate to loses of biodiversity flora and fauna through the construction of hard standing surfaces as a by-product of development.

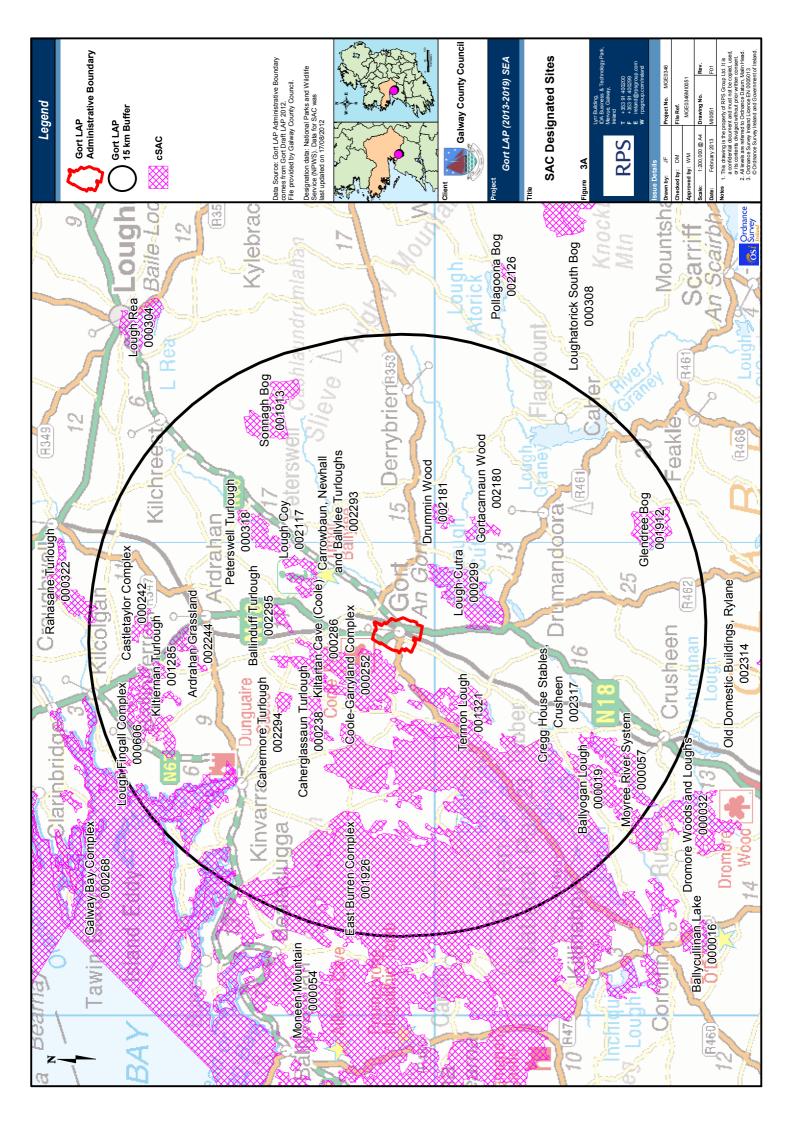
There is existing pressure on the Cannahowna/Gort River, which runs through the centre of the town and has been classified as 'Poor' status under the Water Framework Directive (WFD). This status must be improved to at least 'Good' status by 2015 which is within the lifetime of this Plan.

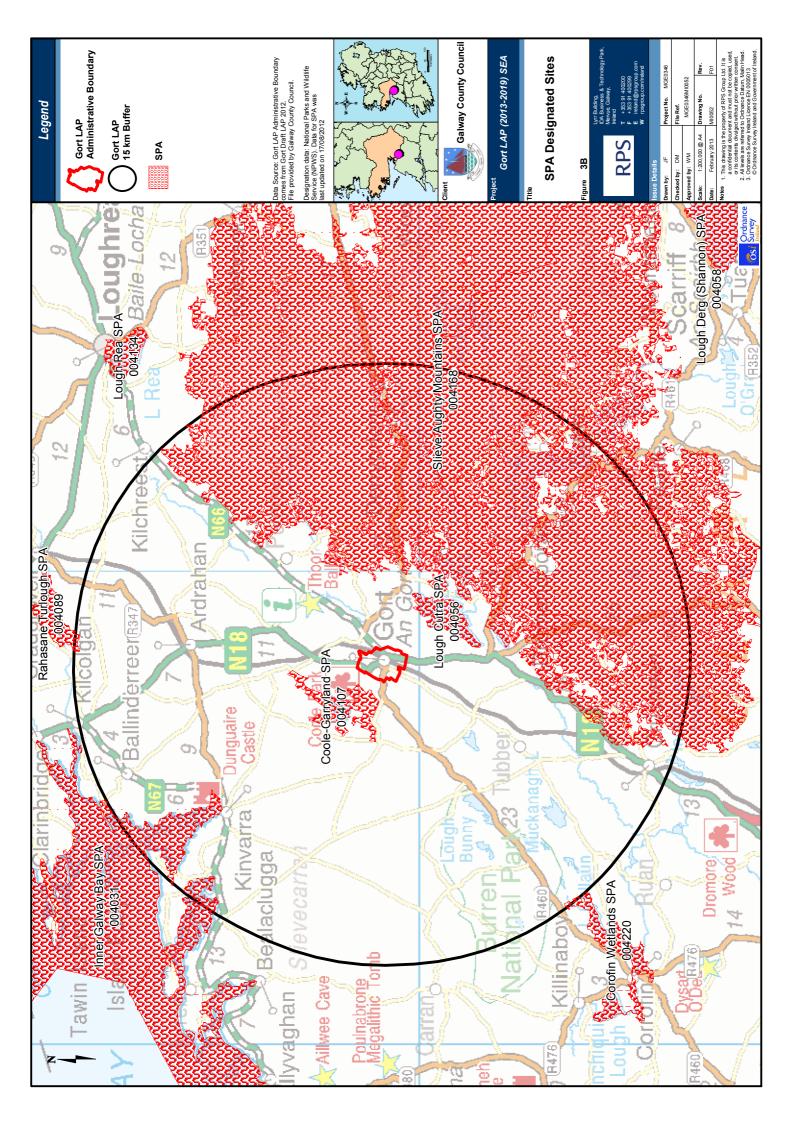
The close proximity of the town to Coole-Garryland Complex and Lough Cutra can put pressure on these water dependent habitats. These habitats are both Natura 2000 sites and are further outlined in the Appropriate Assessment Natura Impact Report.

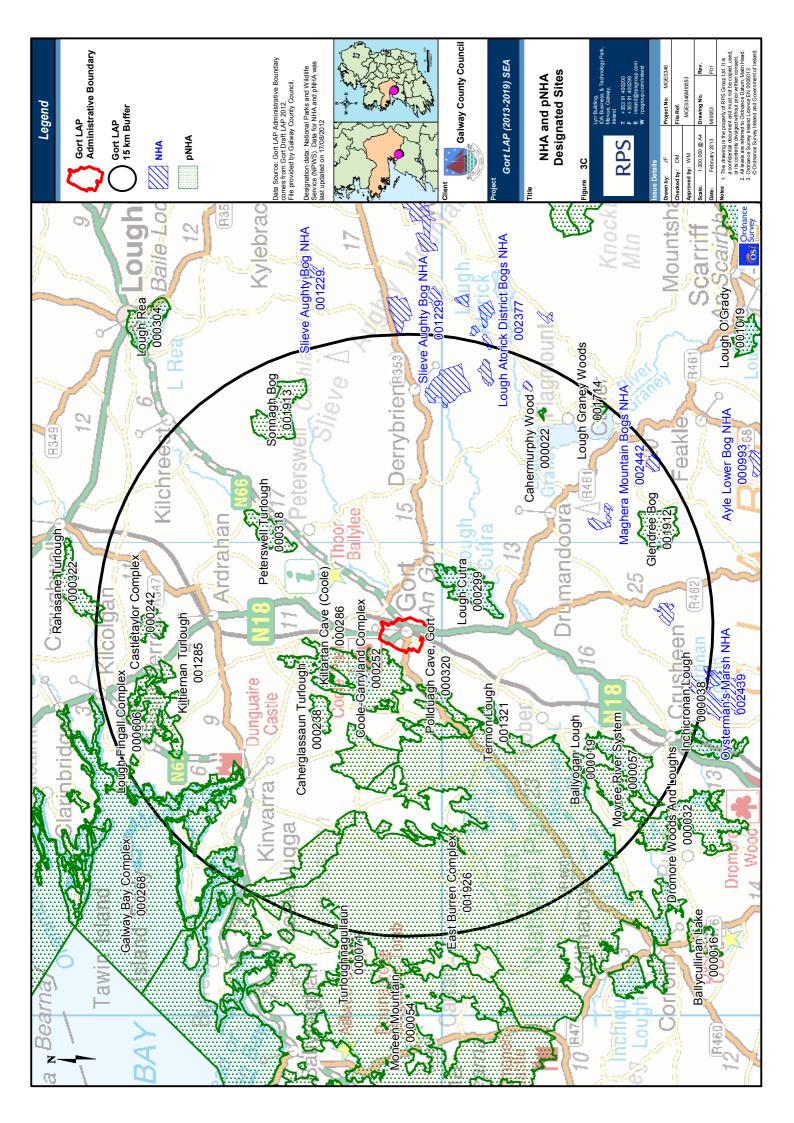
3.4 SOIL AND GEOLOGY

3.4.1 Soils Types

Soils are offered protection through the proposed EC Directive 2004/35/EC of the European Parliament and of the Council for establishing a framework for the protection of soil and amending Directive 2004/35/EC. This Directive provides a common strategy for the protection and sustainable







use of soil based on the principles of integration of soil concerns into other policies, preservation of soil functions within the context of sustainable use, prevention of threats to soil and migration of their effects, as well as restoration of degraded soils to a level of functionality consistent with the current and approved future use.

The Gort administrative area is dominated by shallow and deep well drained mineral soils. This soil is freely draining and very fertile due to its large amount of organic matter. It has a soil horizon of clay material with the parent material being mainly limestone. Generally it is a "medium-heavy" textured soil with a weak to moderately good structure. It has desirable physical properties and ideally suited to tillage, pasture, meadow and forestry. The principal soil types within the LAP are:

- Mineral alluvium,
- Deep well drained mineral, derived from mainly calcareous parent materials,
- Shallow well drained mineral, derived from mainly calcareous parent materials, and
- Made ground.

There are large areas of blanket peat and poorly drained mineral soils with peaty topsoil to the east of the LAP boundary in the Slieve Aughty Mountains. To the west of the LAP lies the Burren, an area of karst landscape with shallow well drained mineral derived from mainly basic parent materials.

3.4.2 Geology

The bedrock geology of Gort is classified as various families of limestone with Visean shelf limestone to the west of the LAP and Waulsortian limestones to the east of the LAP. Karst limestone features are common in the vicinity of, but not located within Gort LAP administrative boundary.

3.4.3 Existing Environmental Pressures / Problems

Soil erosion due mainly to surface erosion resulting from construction works has major potential to impact on water quality and fisheries resources. In addition to water quality and fisheries, these can impact on infrastructure and can have health and safety implications.

Pressures on soils outside the administrative area include development on previously rural sites, which restricts the agricultural potential of these soils and decreases the sustainable production of food within proximity to urban areas.

3.5 WATER

3.5.1 River Basin Districts and Waterbodies

Since 2000, the Water Framework Directive 2000/60/EC (WFD) has directed water management in the EU. 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, enhance and restore all waters with the aim of achieving at least 'Good' Status by 2015. All public bodies, including Galway County Council, are also required to coordinate their policies and operations so as to achieve/ maintain Good Status of waterbodies, within their jurisdiction in line with the relevant River Basin Management Plan and Programme of Measures.

For the purpose of implementing the WFD, Ireland has been divided into eight River Basin Districts and Gort is located within both the Western River Basin District (WRBD).

3.5.2 Surface Water

Gort is located within the Kinvara Water Management Unit (WMU) Action Plan area. Under the Kinvara (WMU) Action Plan (2010) the Cannahowna/Gort River, the main river body in the plan area, is classified at 'Poor' status. The surface water quality of the overall plan area is of 'Poor' status.

3.5.3 Groundwater

Groundwater is a further significant resource and refers to water stored underground in saturated rock, sand, gravel, and soil. Surface and groundwater functions are closely related and form part of the hydrological cycle. The protection of groundwater from land uses is a critical consideration. The groundwater body underlying the Gort area, Caherglassaun, has been assigned 'Good' status under the Water Framework Directive.

3.5.4 Flooding

Gort has been subject to flood events historically and in recent years. Areas throughout the town and particularly adjacent to the Cannahowna/Gort River are subject to flooding within an indicative Flood Zone. However, this analysis is not exhaustive and areas not mentioned here could still be at risk of flooding. The identification of flood risk areas and events has informed the land use zonings proposed in the Draft LAP.

3.5.5 Existing Water Environmental Pressures / Problems

The above descriptions identify a number of sensitivities with regard to the status of surface and groundwater bodies within the LAP area. The existing surface water status identify the majority of the Draft LAP to be classified under the WFD as having 'poor status', while the river running through the LAP is 'not at risk' as defined under the WFD. The majority of the town is overlain by a regionally important aquifer and pressure has already been put on this aquifer as a result of the construction of the motorway.

Changes in the occurrence of severe rainfall events as a result of climate change over the next 50 to 100 years would be likely to increase the frequency and severity of flooding events and inundation, which could result in damage and loss to houses and infrastructure. These risks could be further exacerbated by: urban development increasing the speed and volume of run-off; and changes to geomorphological processes such as sediment transport, siltation and erosion.

3.6 NOISE

The Environmental Noise Regulations relate to community or environmental noise, which is classified as; 'Community/Environmental Noise: Unwanted sound in a non-occupational setting, indoors or outdoors, caused by sources over which an individual has little or no control, including sounds produced by neighbours'. Strategic noise mapping was undertaken in 2007 by the designated noise mapping bodies of the major roads and junctions in the area. Galway County Council also produced a Draft Noise Action Plan for the County (2008) which presents a number of actions and mitigation measures. The purpose of the Galway Noise Action Plan is to act as a means of managing environmental noise, and to meet the aim of the Directive of preventing, and reducing where necessary, environmental noise through the adoption of action plans. The overriding noise source for Gort is traffic which arises from the nearby M18 and N18. The mapping does not provide details on noise sources within Gort, but it is evident that all of the radial routes leading into Gort would be a source for noise pollution.

3.6.1 Existing Noise Environmental Pressures / Problems

The identification of quiet areas, which have low noise levels, and maintaining or reducing existing noise levels, in order to sustain quiet areas is important. Reducing high levels and maintaining low levels are the main noise issues facing development of the Gort.

3.7 CLIMATIC FACTORS

Ireland has an abundance of rainfall with low evapotranspiration, high humidity, mild winters $(4.5^{\circ}C)$ and cool summers $(15.5^{\circ}C)$ (IFA, 2004). A recent publication from the EPA (2009) 'Climate Change – Refining the Impacts for Ireland' outlines predictions in relation to Irish climate and conditions to the end of this century. Climate change refers to changes in climatic conditions whether through natural variations or as a result of manmade influences. It is expected that temperature in Ireland will rise, with drier summers, wetter winters and more variable precipitation patterns and temperature in the coming years. It is explained that the changes likely to be experienced are due to the increasing amounts of CO2 and other greenhouse gases in the atmosphere which are continually rising. All developments, agriculture, energy generation, industry and commercial activity and waste generation contribute emissions to air and greenhouse gas (GHG) emissions; however the emission of pollutants from vehicles is one of the main threats to air quality in Ireland and contributes significantly to the increase of greenhouse gases. Under the Kyoto Protocol Ireland agreed to a target of limiting its greenhouse gas emissions to 13% above 1990 levels by the first commitment period 2008 – 2012 as part of its contribution to the overall EU target.

3.7.1 Existing Climate Change Environmental Pressures and Problems

Potential effects of climate change on Gort could result in an increase in the frequency and severity of flooding events from rainfall. Severe rainfall events as a result of climate change could adversely impact upon the town's population, its biodiversity and its local economy.

3.8 MATERIAL ASSETS

3.8.1 Introduction

The sustainable growth of Gort is dependent on the satisfactory provision of service infrastructure, utilities, energy, and communication networks. These elements should be planned so as to ensure that there is adequate availability to support future development, in a manner that is environmentally appropriate, cost effective, and efficient and protects public health. The phasing of development in tandem with the provision of necessary infrastructure and utilities will also be critical to the future sustainable development of the town.

The material assets of Gort may be broken down into a number of relevant categories. These are: wastewater, drinking water, transport infrastructure, telecommunications and energy infrastructure and waste management.

3.8.2 Land Use

The Core Strategy in the Galway County Development Plan sets the context and parameters for the development of Gort as a 'Key Town' in the County. Based on population projections forecast by the West Regional Authority and set out under the Core Strategy, the amount of zoned residential land required to meet this target is set at 23.66Ha for Gort. Lands have also been zoned in the Local Area Plan for other land uses based on the designation of Gort in the Core Strategy, existing land use patterns, projected needs derived from medium and long term population targets and the optimum utilisation of existing and planned infrastructure. The land use zones provided for in the Draft Plan

include Town Centre (C1), Industrial (I), Business and Enterprise (BE), Community Facilities (CF), Open Space/Recreation and Amenity (OS), Agriculture (A), Public Utilities (PU) and Transport Infrastructure (TI). Proposed land use zoning for the Draft Gort LAP 2013-2019 is shown in the Draft LAP and Environmental Report.

3.8.3 Drinking Water

The availability of a water supply of sufficient quality and quantity is essential for public health purposes and sustainable growth. Similarly water conservation is also essential to prevent the unnecessary loss of this precious resource.

The primary source of Gort's water is the Rindifin Treatment Plan which sources water from the Gort/Cannahowna River upstream of the town. The current demand on the Gort WSS is approximately averaging at 970m³/day. The maximum capacity of the existing plant is 1,400m³/day, therefore providing a spare capacity of approximately 430m³/day. The projected population increase of 820 persons as outlined in the Core Strategy is equivalent to an increase in demand of 123m³/day^a. No future alternative drinking source is proposed.

3.8.4 Wastewater

Gort is serviced by a public wastewater collection network with both primary and secondary treatment. The Gort Wastewater Treatment Plant (WWTP) is located on the Kinincha Road to the north of the town. The treated effluent from the WWTP is finally discharged into the Cannahowna/Gort River which goes underground at Kiltartan before finally draining into Corranroe Bay south of Kinvara. The plant currently has a spare capacity of 469 PE.

3.8.5 Transportation

The development of Gort as a key commuter town and as a location for strategic development, building on its improved road connectivity (via M18, N18 and N66) is a particular focus in making the new Local Area Plan. The proposed section of motorway (proposed M18) from Gort to Tuam is awaiting construction commencement. The opening of the Ennis to Athenry portion of the Western Rail Corridor, which goes through Gort, linking Limerick City to Galway City, has also significantly enhanced accessibility both within County Galway and other adjoining regions. Bus services connect the town to the north and south. An efficient transport system is essential for the sustainable development of a town. Galway County Council aims to provide a safe and efficient transport system and a quality road infrastructure.

New relief/link road/streets are indicated connecting the north-eastern approach N66 Loughrea road to the N18 Gort in the north western portion of the Draft Plan Area and connecting the south eastern approach road R458 Ennis Road to the L4514 Tubber Road on the north western portion of the Draft Plan Area.

^aBased on a conservative estimate of consumption of 150l/person/day as detailed in the 'National Water Study' (WS Atkins Ireland, 2000)

3.8.6 Telecommunications and Energy Infrastructure

Developments require adequate power, energy and telecommunications services, including electricity, gas supply, telephone services and broadband, which are provided by a number of different service providers. Gort is served by Eircom and a number of mobile telecommunications operators.

Galway County Council has included policies and objectives within the Draft Plan which seek to facilitate the continuous development of energy infrastructure and telecommunications at appropriate locations, subject to proper planning and sustainable development considerations. In addition, inappropriate development relating to energy infrastructure and telecommunications which may impact on the ecological integrity of European 2000 sites will be restricted through Appropriate Assessment Screening.

3.8.7 Waste Management

The Waste Management Plan for the Connacht Region provides policy guidance on waste management in County Galway. Best practice in terms of waste management recommends that as much waste as possible is dealt with through reduction, reuse and recycling, with as little as possible remaining for disposal.

A segregated waste collection service for dry recyclables and landfill waste is currently provided in the Gort area by a private operator for domestic and commercial waste. A bring bank facility is provided for the collection of glass.

3.8.8 Existing Environmental Pressures / Problems

The current WWTP is operating with a 469 PE spare capacity. However, the Regional Planning Guidelines and the County Development Plan Core Strategy set a target population of an additional 820 persons for Gort. The Draft Plan includes an objective, which requires that all new developments be adequately serviced with wastewater disposal and that only as much development be encouraged that can be provided for based on the utility services available and that any proposed development be prohibited that cannot be adequately serviced. It is proposed to monitor the capacity of the wastewater treatment plant as development takes place and to progress the upgrading of the existing wastewater treatment plant and the sewer network for the town under the Water Services Investment Programme.

The need to increase the use of existing public transport, and provide for additional systems to accommodate existing and future growth of the Gort and its environs is a pressing priority. Increasing the amount of pedestrian and cyclist movements is also a significant challenge.

3.9 CULTURAL, ARCHITECTURAL AND ARCHAEOLOGICAL HERITAGE

3.9.1 Introduction

Gort has both a rich and diverse architectural heritage, comprising a number of structures of historical and architectural importance. This heritage provides the town with a resource of tremendous social, educational, recreational and aesthetic value. In economic terms, it is of fundamental importance to the maintenance and development of the town's tourism industry. For present and future generations who will live and visit the town, the historic and cultural heritage of the town has the ability to enhance and enrich the context of everyday existence.

3.9.2 Archaeological and Cultural Heritage

County Galway contains significant cultural heritage resources. Built heritage ranges from national monuments to ringforts, stone circles, towerhouses, gates and bridges. There are a range of categories under the National Monuments Acts 1934 to 2004. These are:

- National monuments in the ownership or guardianship of the Minister or a Local Authority or national monuments which are subject to a preservation order;
- Historic monuments or archaeological areas recorded in the Register of Historic
- Monuments; or
- Monuments or places recorded in the Record of Monuments and Places.

The archaeological heritage of Gort includes structures, constructions, groups of buildings, developed sites, recorded monuments as well as their contexts, and moveable objects, situated on land. Archaeological heritage is not confined to the archaeological sites within the Record of Monuments and Places. It includes any archaeological site that may not have been as yet recorded, as well as archaeology beneath the ground surface, and the context of any site.

3.9.3 Architectural Heritage

The term architectural heritage is defined in the Architectural Heritage (National Inventory) and Historic Monuments Act 1999 as meaning all: structures and buildings together with their settings and attendant grounds, fixtures and fittings; groups of structures and buildings; and sites which are of historical, archaeological, artistic, cultural, scientific, social or technical interest. The NIAHs purpose is to protect and conserve the built heritage and it is the NIAH surveys that provide the basis for the recommendations to the planning authorities for the inclusion of particular structures in their Record of Protected Structures (RPS).

Gort has a designated Architectural Conservation Area (ACA), which seeks to protect the special character of the historic core. The designation of the historic town centre core as an ACA and the associated management of both individual buildings and the public realm in the area will significantly enhance the quality of the local environment within Gort.

3.9.4 Existing Environmental Pressures / Problems

The accommodation of further development in Gort has the potential to cumulatively impact upon the heritage features of the area. Development which involves material alterations or additions to protected structures can detract from the special character of the structure and its settings, and have the potential to result in the loss of features of architectural or historical interest. Development on sites adjoining protected monuments, places or structures can also impact the setting of these cultural heritage items.

Alternately, encouraging and facilitating the accommodation of growth on infill or redevelopment sites will contribute to mitigating a number of the adverse impacts associated with development of previously undeveloped sites, both within and outside the Gort administrative area.

3.10 LANDSCAPE

3.10.1 Introduction

Landscapes are areas which are perceived by people and are made up of a number of layers: landform, which results from geological and geomorphological history; land cover, which includes vegetation, water, human settlements, and; human values, which are a result of historical, cultural, religious and other understandings and interactions with landform and land cover. Galway County

Council's (2003) Landscape Character Assessment classifies landscapes in Galway according to their sensitivity, their ability to accommodate change or intervention without suffering unacceptable effects to character and values.

Under the Landscape Sensitivity Rating in the County Development Plan, Gort and its hinterland are classified as 'Class 2 - Moderate Sensitivity' (to the south and southeast) and 'Class 3 - High Sensitivity' (to the north and northwest).

There are a number of 'Areas of High Amenity' adjacent to Gort and these areas which are, in general, sensitive to development. These areas include, Lough Cutra to the south east of the LAP, the Slieve Aughty Mountains to the east of the LAP and the Burren to the west of the LAP.

The Galway County Development Plan also identifies a number of protected focal points/views in the area including focal points to the south and south west of the LAP boundary including Cill Mac Duach – historic ecclesiastical village. A protected focal point / view is a requirement within the Draft LAP to preserve the view of a specific place or historic building from another location. Within the Draft LAP, a number of views are protected.

3.10.2 Existing Landscape Environmental Pressures / Problems

Areas of land to the west of the Draft LAP are sensitive to the effects of development. A problem with regard to the environment component of landscape is the cumulative visual impact that occurs as a result of developments such as one off housing. Such developments which individually often do not have significant adverse impacts have the potential to cumulatively impact upon sensitive landscapes. In the context of Gort this type of development has the potential to occur on the outskirts of the town boundary, but could have an impact on the protected focal views/points which occur throughout the town.

3.10.3 Inter-Relationships

The interrelationship between the SEA environmental topics is an important consideration for environmental assessment. **Table 3.2** highlights the key interrelationships identified in this SEA. These potential interrelationships will be taken into account in the assessment of the different alternatives.

Soils	\checkmark							
Water	\checkmark	\checkmark						
Noise	\checkmark	x	х					
Biodiversity, Flora, Fauna	\checkmark	\checkmark	\checkmark	\checkmark				
Climatic Factors	\checkmark	\checkmark	\checkmark	x	\checkmark			
Material Assets	\checkmark	\checkmark	\checkmark	x	\checkmark	\checkmark		
Cultural Heritage	\checkmark	\checkmark	\checkmark	x	\checkmark	\checkmark	\checkmark	
Landscape	\checkmark	\checkmark	\checkmark	\checkmark	\checkmark	\checkmark	\checkmark	\checkmark
	Population	Soils	Water	Noise	Biodiversity Flora, Fauna	Climatic Factors	Material Assets	Cultural Heritage

Table 3.2:Key Interrelationships between SEA Environmental Topics

 $\sqrt{}$ = interrelationship anticipated

X = no interrelationship anticipated

Of particular note are the primary relationships between water quality and biodiversity, flora and fauna. Flora and fauna, including protected species and habitats, rely directly on the aquatic environment as a habitat. Water and climate also have a key relationship. Global GHG emissions associated with transport, industry and other sources have the potential to negatively impact on climate change. This in turn can result in more frequent and more intense flooding and drought conditions affecting material assets, such as private residences and infrastructure, and biodiversity through changes in water quality and the hydrologic regime. In carrying out the assessment these important direct and indirect relationships have been taken fully into account to ensure a robust and complete assessment.

3.11 EVOLUTION OF THE ENVIRONMENT IN THE ABSENCE OF THE LAP

Population: In the absence of the LAP there may be pressure to increase population densities in an unsustainable manner with potential impacts on sensitive areas such as Coole/Garryland and other hydrologically connected designated sites. Without the provision of objectives that emphasise the consolidation of the town and set out its phased residential development only with sufficient wastewater and water supply infrastructure in place, development could take place which would impact on environmental issues on the Gort area.

Biodiversity, flora and fauna: There can be a conflict between development and biodiversity. Gort town has habitats both within the town and hydrologically connected to the town which are protected in their own right or support protected species. The progression of Gort without this LAP might result in development which would not be restricted or phased to mirror delivery of the appropriate infrastructure, such as drainage and wastewater, and this would also have negative impacts on biodiversity and water quality.

Soils: There could be increased pressure on greenfield lands as opposed to re-development of brownfield lands and infill development in the absence of the LAP. Focus should always be towards the redevelopment of existing brownfield sites and infill development within the town centre.

Water: The Cannahowna/Gort River flows through Gort LAP administrative boundary and both supplies drinking water for the town, upstream of the town, and receives discharges from the Gort Wastewater Treatment Plant downstream of the town. The catchment in which Gort town is situated is 'Poor' status within the majority of the LAP except for a small portion to the east of the LAP which is recorded as 'Bad' status under the WFD classification system. There is a requirement to improve this to at least 'Good' status by 2015. The RBMP and associated Programme of Measures POM set out the approach to achieving improved status. The development plan process is the vehicle for implementation of many of the actions included in the RBMP and POMs, therefore, it is expected that improvement to 'Good' status would occur more swiftly if this LAP is adopted as it includes provisions to adhere to the RBMP POMs.

Noise: Although the new M18 is likely to have reduced amounts of traffic through the town the operation of the M18 has lead to increased amounts of motor vehicle noise with subsequent impacts on residential dwellings to the west of the town. Large amounts of travel take place within, through and adjacent to the town, due to its close proximity to Galway City and Ennis Town and its position as a commuter town. The Draft LAP includes provision for many sustainable transport options, which will improve conditions within the town. Without the provision of promotion of these sustainable transport options in the Draft LAP, it is anticipated that development of these may be more difficult in the long term and the result would be: increased numbers of private vehicles using the roads; development of new roads to service a more dispersed population; and resulting noise impacts on residential and recreational amenity. Noise barriers and bunds are provided on the N18 to mitigate traffic noise on sensitive receptors.

Climate: An issue facing Gort town in relation to climate change relates to the danger posed by flooding events, which may occur, at least in part, as a result of increased amounts of global GHG emissions from transport. Gort town has a significant recent history of flooding with a high incidence of

rainfall events occurring more frequently which cause local flooding. Local solutions to this international issue include reduction in unsustainable transport movements, which is encouraged under the Draft LAP.

Material Assets: An increased population within Gort town there will likely bring an increased generation of waste and litter. The policies within the LAP will facilitate, on a local level, the county waste management plan and the strategies to deal with collection, recycling and disposal of waste from householders and industrial/ commercial businesses. Other material assets are included under the water section.

Cultural Heritage and Landscape: Further development in Gort has the potential to cumulatively impact upon heritage features in and surrounding the town. Development without the Draft LAP has the potential to affect its landscapes as well as changing the context of existing architectural assets. The town contains zones of archaeological potential along with an architectural conservation area, a number of recorded monuments and places locally protected views. The LAP provides a way to balance the needs of the built, architectural, cultural and natural heritage in order to continue development in a sustainable manner. Without the drive for consolidation included in the LAP, it is likely that development will continue in rural areas away from the town centre. This scattered development, or sprawl, would impact on the rural landscape around Gort and would lead to loss of hedgerows and trees and their contribution to biodiversity. Fragmentation of habitats and field boundaries is also likely to result.

4 REVIEW OF RELEVANT POLICIES, PLANS AND PROGRAMMES

The Draft Gort LAP is situated within a hierarchy of International, National, regional, and county level policy guidelines. In addition, there is an overarching legislative framework which provides the statutory (legal) basis for designations and objectives. This chapter of the Environmental Report reviews the consistency of the Draft LAP within this policy and regulatory framework.

International Level Plans, Policies and Programmes

Торіс	Title
Biodiversity	UN Convention on Biological Diversity (1992)
Climate Change	UN Kyoto Protocol The United Nations Framework Convention on Climate Change (UNFCCC) Kyoto Protocol, 1997
Cultural Heritage	The World Heritage Convention United Nations Convention Concerning the Protection of the World Cultural and Natural Heritage (Paris 1972)
Human Health/Air	World Health Organisation (WHO) Air Quality Guidelines (1999) and Guidelines for Europe (1987)

European Level Plans, Policies and Programmes

Торіс	Title
Noise	The Environmental Noise Directive (END) (2002/49/EC)
Biodiversity	The EU Biodiversity Strategy Communication on a European Community Biodiversity Strategy [Com (98) 42]
	The EU Habitats Directive Conservation of Natural Habitats and of Wild Flora and Fauna (92/43/EEC)
	The EU Birds Directive Conservation of Wild Birds Directive (79/409/EEC)
	Freshwater Fisheries Directive (78/659/EEC)
Cultural Heritage	Convention for the Protection of the Archaeological Heritage of Europe (revised) (Valletta 1992)
	Convention for the Protection of the Architectural Heritage of Europe (Granada 1985)
Sustainable Development	The Gothenburg Strategy (2001) Communication from the Commission on "a Sustainable Europe for a Better World"
	The Sixth Environmental Action Programme (EAP) of the European Community 2002-2012
	The SEA Directive (2001/42/EC)
	The EIA Directive (85/337/EEC) as amended by Directive 97/11/EC
	Second European Climate Change Programme (ECCP II) 2005.
Water	The Water Framework Directive (2000/60/EC)
	EU Floods Directive (2007/60/EC)
	Bathing Water Directive (2006/7/EC)

Торіс	Title
	The Groundwater Directive (1980/68/EC) and Groundwater Directive (2006/118/EC)
	The Urban Wastewater Treatment Directive (91/271/EEC) as amended by Directive (98/15/EEC)
	Drinking Water Directive (80/778/EEC) as amended by Directive 98/83/EC
Waste	The Landfill Directive (99/31/EC)
Soil	Soil Thematic Strategy (COM(2006) 231) and a proposal for a Soil Framework Directive (COM(2006) 232)

National Level Plans, Policies and Programmes

Торіс	Title
Biodiversity	'Actions for Biodiversity 2011-2016', Ireland's 2nd National Biodiversity Plan
	The Wildlife Act 1976 and the Wildlife (Amendment) Act 2000
	Flora Protection Order 1999
	European Communities (Natural Habitats) Regulations, S.I. 94/1997, as amended S.I. 233/1998, S.I. 378/2005 and
	European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011)
	Quality of Salmonid Waters Regulations 1988 (S.I. 293 of 1988)
Climate	National Climate Change Strategy (2000) and National Climate Change Strategy 2007- 2012
	Department of Transport, 2003: 'Statement of Strategy: 2003-2005'
Heritage	National Heritage Plan 2002 - 2006
	The National Monuments Acts (1930 to 2004)
	The Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act 1999
	Planning and Development Acts 2000-2011
Planning	National Spatial Strategy 2002-2020
	National Development Plan 2007-2013 Transforming Ireland - A Better Quality of Life for All.

Торіс	Title				
	Planning and Development Acts 2000-2011				
	Planning and Development (Strategic Infrastructure) Act 2006				
	The Sustainable Residential Development in Urban Areas Guidelines 2008				
	Retail Planning Guidelines for Planning Authorities, 2005				
Sustainable Development	Sustainable Development: A Strategy for Ireland, 1997				
	Making Ireland's Development Sustainable - 2002				
	National Sustainable Development Policy				
	National Climate Change Strategy 2007 - 2012				
	Housing Policy Framework: Building Sustainable Communities, 2005				
	Towards Sustainable Communities; Guidelines on Local Agenda 21, 2001				
Transport	Transport 21				
Water	Arterial Drainage Acts, 1945 and 1995				
	European Communities (Drinking Water) (No. 2) Regulations 2007 (SI No. 278 of 2007)				
	Water Services Acts 2007 and 2012				
	Water Pollution Acts 1977-1990				
	European Communities (Waste Water Treatment) Prevention of Odours and Noise) Regulations 2005 (SI No. 787 of 2005)				
	Waste Water Discharge (Authorisation) Regulations 2007 (SI No. 684 of 2007)				
	Surface Water Regulations 2009				
	Water Services Investment Programme				

Торіс	Title
Waste	The Waste Management Act 1996 and amendments
	Changing our Ways (1998)
	Delivering Change - Recycling and Preventing Waste (2002)

Regional and County Level Plans, Policies and Programmes

Торіс	Title
Transport	A Platform for Change Strategy 2000-2016
	Galway County Council Walking & Cycling Strategy Report 2012
Cultural Heritage	Galway County Heritage Plan 2009-2014
Water and Wastewater	Water Services Investment Programme 2010-2012 (extended to 2013)
Planning	The Regional Planning Guidelines for the West Region 2010 - 2022
	Galway Development Plan 2009-2015 and Variation No. 1 and Variation No. 2 to the Plan
	Relevant Local Area Plans

5 ENVIRONMENTAL PROTECTION OBJECTIVES

This overall aim of the SEA is to facilitate environmental protection and to allow the integration of environmental considerations into the development of the Draft LAP. To that end, the SEA process assesses the Draft LAP as it evolves in terms of its environmental impacts. This process highlights how improvements can be integrated into the Draft LAP of Gort to increase its environmental performance and maintain environmental resources. Establishing environmental objectives is a key element of SEA as it allows the assessment of the Strategy as it is implemented over time. SEA Environmental Protection Objectives are different to objectives detailed in the Draft LAP, however they are used to assess the development strategies of the Draft LAP and allow its evaluation and identification of where conflicts may occur. This forms the basis of the environmental assessment of the Draft LAP, which is presented in **Table 5.1**.

SEA Issue	Environmental Protection Objectives					
Population/ Human Health	Pop1 – Ensure only sufficient development is permitted, as required for in the projected increase or population within the Core Strategy targets					
Soil/Landuse	Soi1 – Protect and, where appropriate, enhance the function and quality of the soil resource in Gort					
Water	Wat1 – Protect and enhance the status of aqua ecosystems in line with WFD and, with regard to th water needs, terrestrial ecosystems and wetlan directly depending on the aquatic ecosystem (quali level, flow).					
	Wat2 – Prevent pollution and contamination of ground water by adhering to aquifer protection plans.					
	Wat3 – Reduce risk of flooding through avoidance of development in Flood Zones A or B					
	Bio1 – Protect, conserve and avoid loss of the diversity and range, area or population of habitats species and wildlife corridors.					
Biodiversity, Flora and Fauna	Bio2 - Protect designated European Sites (SACs & SPAs) under Article 6 of the Habitats Directive. Conserve and protect, or maintain and restore Natura 2000 sites and the Natura 2000 Network.					
	Bio3 - Conserve and protect other nature conservation sites (NHAs, pNHAs, National Parks, Nature Reserves, and Wildfowl Sanctuaries).					
	Bio4 – Protect habitats (terrestrial and aquatic) from non-native invasive species and prevent non-native invasive species spread.					
Climatic Factors	Cli1 – Contribute to mitigation of, and adaptation to climate change and air quality issues.					
Material Assets	Mat1 - To ensure that drinking water supplies are free of contamination.					
Maleriai ASSELS	Mat2 - To ensure that all development is adequated serviced to EPA standards prior to discharge.					

Table 5.1: Environmental Protection Objectives

SEA Issue	Environmental Protection Objectives					
Cultural, Architectural and Archaeological Heritage	H1 – Protect and conserve the cultural heritage including the built environment and settings; archaeological (recorded and unrecorded monuments), architectural (Protected Structures, Architectural Conservation Areas, vernacular buildings, materials and urban fabric) and manmade landscape features (e.g. field walls, footpaths, gate piers etc.).					
	H2 – To ensure the restoration and re-use of existing uninhabited and derelict structures where possible opposed to demolition and new build (to promote sustainability and reduce landfill).					
Landscape	Lan1– Protect designated landscapes and scenic views, routes and landscape features of local value.					
Noise	Noi1 -To protect residents from adverse noise levels					

6 LOCAL AREA PLAN ALTERNATIVES

6.1 INTRODUCTION

This section describes the alternatives considered in the development of the Draft LAP. The consideration of alternatives and the evaluation of their likely environmental impacts is a key function of the SEA process.

The following strategic alternatives for the Draft LAP were considered for assessment as part of the SEA process for the Draft Gort LAP 2013-2019. The strengths and weaknesses of the various approaches are evaluated and a preferred alternative derived. A summary of the assessment of each alternative is included in **Table 6.1**. The following criteria have been used in the Assessment Matrix: plus (+) indicates a potential positive impact, minus (-) indicates a potential negative impact, plus/minus (+/-) indicates that both positive and negative impacts are likely or that in the absence of further detail the impact is unclear, and a neutral or no impact is indicated by a zero (0). Combinations of these symbols have also been used, e.g.0/-, which indicates that an impact may be neutral or negative depending on how the policy or objective is delivered.

Table 6.1: Assessment of Each Alternative

Alternative Considered	0		F	-	+/-	
Development Option 1 – Extend Development Southwards: This scenario would encourage peripheral, car based development on the southern edges of the town, mainly along the Ennis Road (R458) and Tubber Road (L4514) on undeveloped lands outside the 10 min walking distance (800m) of the town centre, existing built fabric and essential wastewater services.	Pop1	Н	11	Wat3	Soi1, Wat1, Wat2, Bio1,Bio2, Bio3, Bio4, Cli1, Mat1, Mat2, H2,Lan1, Noi1	
This option is likely to impact negatively on the vitality and viability of the town centre, on the strategic function of the M18 Motorway, N18 and N66 as traffic arteries, national/regional routes and in relation to public transport via the Ennis - Athenry section of the Western Rail Corridor. Lands have also been identified within flood risk areas particularly south of the Tubber Road and north of the Cannahowna/Gort River. Pluvial flooding has also been identified on lands to the south eastern periphery of the LAP boundary between the Tubber Road (L4514) and the Cannahowna/Gort River and also to the north of the Ennis Road (R458).						
Alternative Considered		0	+	-	+/-	

Alternative Considered	0	+		+	-	+/-
Development Option 2 – Consolidate Existing Town Centre, Sequential Development around Established Urban Core and Controlled Eastward Expansion This option provides for the consolidation of the existing town centre, sequential development around the established urban core within the town and controlled eastward expansion along the N60 Route. Town centre consolidation is achievable through promoting appropriate densities at the righ locations and supporting the redevelopment of brownfield, derelict and back land sites including existing laneways which primarily lead to Marke Square and within the urban core of Gort. New Town Centre development (C1) and Residential Phase 1 (phased for residentia development within the lifetime of the Plan) are proposed in a contiguous and sequential manner in an eastward direction along the N66 in particular. This development option will potentially maximise of transport, will also potentially ensure the availabil anticipated growth defined by the County Core S significant environmental impacts in relation to iden the Flood Risk Guidelines 2009.		Pop1 turn on inves of optimal, ategy require		resident ments.	ial lands This opti	to accommodate on will also avoid
Alternative Considered	0	+	-		+/-	
Development Option 3 – Extend Development out along Existing Approach Roads This scenario provides for the intensification and extension of new development along the existing approach roads into Gort.	Pop1	H1	Wat		Soi1, Wat1, Wat2, Bio1,Bio2, Bio3, Bio4, Cli1, Mat1, Mat2, H2,Lan1, Noi1	

with associated impacts in terms of poor environmental quality, increased traffic and congestion along the approach roads, increasingly peripheral, car based development and would militate against easy walking distance to the town centre. This option may also lead to the unsustainable management of development in relation to flood risk areas, the continuance of urban sprawl and the improper management of development pressures at major transportation interchanges specifically in relation to the M18 Motorway located to the north west of Gort.

6.2 SEA PREFERRED ALTERNATIVE

The preferred Alternative as proposed under the development strategy for the Draft Gort LAP is Development Option 2. The alternative as chosen within the Gort LAP is in accordance with preferred alternative scenario as prepared in the Environmental Report.

This alternative scenario would meet a large number of the objectives of the Plan as it supports the consolidation of the town centre, promotes the infill and sequential development of the town and encourages street-oriented development along the existing urban street network. It also locates new Town Centre (C1) and Residential Phase 1 expansion potential to the east, adjacent to the Gort Railway station and along the N66 and recognises the area as a prime development quarter in terms

of integrating land use and public transportation. This approach also integrates improvements in the public realm and smarter travel opportunities for the town.

7 EVALUATION OF LOCAL AREA PLAN POLICIES, OBJECTIVES AND ZONINGS

7.1 INTRODUCTION

The purpose of Chapters 7, 8 and 9 of the Environmental Report is to evaluate as far as possible the potential environmental effects of the Draft LAP policies, objectives and zonings and to set out measures to prevent, reduce and as far as possible offset any significant adverse effects on the environment.

7.2 OVERVIEW OF EVALUATION OF POLICIES AND OBJECTIVES

7.2.1 Development Strategy

Development Strategy objectives aim to support orderly and sequential development, to be consistent with the core strategy, to protect the Natura 2000 Network and Habitats Directive Assessment, implement development management standards and guidelines as set out in the CDP and in Section 3 of the Gort LAP, to ensure that development is preceded by sufficient capacity in the public waste water and potable water infrastructure, to direct residential development into appropriately zoned and serviced areas and that new developments with assessed in accordance with the provisions of the *Flood Risk Management Guidelines 2009*.

The policies and objectives for Development Strategy to support and facilitate the sustainable development of the Plan Area in line with the preferred development strategy option, Option 2 – Consolidate Existing Town Centre, Sequential Development around Established Urban Core and Controlled Eastward Expansion, and in a manner that maintains and enhances the quality of life of local communities, promotes opportunities for economic development, social integration and sustainable transport options, protects the cultural, built and natural heritage and environment and complies with relevant statutory requirements.

There is some potential for negative impacts on biodiversity, water and human health as a result of consistence with core strategy. Any new development applications in this regard will also be subject to the objective to ensure sufficient capacity in the public waste water and potable water infrastructure and therefore potential impacts will be minimised or mitigated at this stage.

7.2.2 Residential Development

The policies and objectives for Residential Development generally aimed at the provision of adequate suitable housing and at a rate and scale which is in line with the core strategy of the County Development Plan and subsequently this LAP. These policies are expected to result in positive direct and indirect impacts to population through improvements to quality of life and will provide suitable accommodation for a cross-section of the population.

Appropriate densities, housing mix and provision of services in parallel to development of new residential development are promoted. The prioritisation of development on infill lands, prior to rezoning previously undeveloped lands, will reduce disturbance of habitats and species in undeveloped rural areas and is likely to improve the overall quality of the environment in these brownfield areas. This will also allow for more efficient provision of facilities such as waste, transport, water and wastewater, provided that these are in place in advance or in parallel with new residential development.

Further, policies promote the phasing of development and prioritisation of Phase I residential development within close proximity of the town during the lifetime of this LAP. This will indirectly assist

in maintaining the habitat networks and rivers in undeveloped rural areas, through increasing development capacity within the town centre. There is some potential for negative impacts on biodiversity, water and soils unless design and layout take such issues into account at the outset. Any new development applications in this regard will also be subject to development management requirements of this LAP and the Galway CDP 2009-2015 and potential impacts will be minimised or mitigated at this stage.

Impacts in relation to climate as a result of consolidating development within and immediately adjoining the town are expected to be positive, as this policy will focus development within the urban area, which is well served with public transport links and would also promote walking and cycling.

7.2.3 Social and Community Development

The policies for social and community are generally aimed at provision of services and education for the community.

Direct positive effects with respect to population are anticipated with respect to most of the community and education policies and objectives due to the requirement to provide adequate provision of services associated with population growth. Indirect positive impacts with respect to climate change are anticipated with respect to provision of adequate education and community services within the town as this is likely to result in a reduction in the number of students/people which would otherwise be required to commute (either outside of the settlement or outside of the area) for education and other community services purposes.

7.2.4 Economic Development

The policies regarding Economic Development are aimed at facilitating and encouraging tourism and economic development of Gort town which would help to reinforce the town's designation as a Key Town under the Regional Planning Guidelines. To achieve this, policies and objectives aim to build on the town's strategic location to take maximum advantage of lands strategically located to provide for future new employment hubs. This is likely to increase tourist numbers and employment opportunities and quality of life for those living in the Town. These policies are largely anticipated to have positive impacts on population through improving the economic prosperity of Gort and improvement of the visitor experience and the quality of life of its population.

As with new residential developments outlined above, any new developments, such as commercial, industrial etc. development has potential for negative effects on biodiversity, water and soils unless design and layout take such issues into account at the outset. Any new development applications in this regard will also be subject to development management requirements of this LAP and the Galway CDP 2009-2015 and potential impacts will be minimised or mitigated at this stage.

7.2.5 Transport Infrastructure

Many of the policies and objectives for Transport promote the use of sustainable forms of transport, such as walking, cycling and public transport networks, and as such will have positive benefits on the wider environment. This also has positive indirect and cumulative impacts in relation to climate as a result of the decrease in emissions associated with a reduction in use of private vehicles; positive impacts on population through reduced congestion, lower transport emissions and improved economic competitiveness; and positive impacts on material assets through provision of improved infrastructure for users of sustainable transport modes, e.g. Public Transport, cycling and walking.

In addition, promotion of sustainable travel with integrated land use and transportation policies should encourage the redevelopment of Gort town rather than development on sites that are not currently

serviced by public transport or cycle/walking networks, thus resulting in a positive direct impact on material assets.

There is potential for indirect negative effects with regard to the development of new road infrastructure with respect to biodiversity, water, soils and landscape in particular. Route selection and environmental assessment of road infrastructure will be important in terms of avoidance of impacts.

7.2.6 Utilities Infrastructure

The adequacy of water, drainage and environmental services in the future development of the town is necessary to facilitate sustainable development. These key issues are addressed in various policies and objectives to provide for sufficient water, wastewater and water drainage infrastructure to service the predicted requirements for future development of the town over the plan period. Relevant legislative requirements in relation to environmental requirements are also set out including policies and objectives relating to flood risk requirements.

The policies for public services relate to reliable and effective water, drainage, energy, waste management and communications infrastructure to service the existing and future development needs of the town, in an environmentally sustainable manner during the plan period.

The policies in relation to waste management will generally have positive direct and indirect impacts through the provision of recycling facilities throughout the plan area which benefits biodiversity, flora and fauna, population, soils, water, air quality and climate, cultural heritage, landscape, and material assets.

The policies relating to the provision of energy and communications infrastructure will have direct and indirect positive impacts on population by improving the quality of life of Gort town's population.

7.2.7 Urban Design and Landscape

The protection of built heritage and the integration and linkage of new retail developments with the existing urban form/layout are key objectives.

The importance of Gort's townscape qualities which are derived from its historic urban structure are noted throughout the Draft LAP. In this regard a detailed urban design analysis of the existing townscape is set out together with policies and objectives specific to the future development of the town. The Draft LAP encourages the regeneration and conservation of the town centre by using best practice urban design principles and requiring detailed design considerations.

It is anticipated that these objectives will help to reinforce the town's designation as a Key Town under the Regional Planning Guidelines and are likely to increase employment opportunities and quality of life for those living in Gort town.

Prioritisation of development on brownfield sites and infill lands in Gort town centre and immediately adjoining it would have a positive direct impact, as it would be expected to discourage sprawl of commercial and retail development in undeveloped rural areas outside the town boundary. This will also allow for more efficient provision of facilities such as waste, transport, water and wastewater, provided that these are in place in advance or in parallel with the new development. Also, impacts from infill development would be expected to be positive in terms of climate, as this will focus development within the urban envelope of the town, which is well served with public transport links.

7.2.8 Built and Cultural Heritage

Consolidation and expansion of the town centre will have positive direct impacts with respect to cultural heritage and landscape as this would allow for potential improvements to these areas through regeneration. However, care will have to be taken to protect the heritage setting.

The regeneration, consolidation and expansion of the town centre as planned is primarily expected to result in positive impacts as these would represent development on infill and brownfield lands, thereby protecting soils, water and biodiversity and population from cumulative impacts of new development. In certain circumstances, development and intensification may have unforeseen impacts in terms of placing pressure on water, soils and biodiversity. However, integration of these policies with the provision of required infrastructure would be expected to reduce indirect negative impacts on other these receptors.

The protection and enhancement of Gort town's built heritage is an important objective of the Draft Gort LAP. The policies for Cultural, Architectural and Archaeological Heritage will generally be positive particularly for cultural heritage and landscape through the recognition, protection and preservation of the cultural heritage (including archaeology and architecture) of Gort.

7.2.9 Natural Heritage, Green Network/Infrastructure and Recreation and Amenity

The importance of green infrastructure is recognised in the Draft Gort LAP. While there are no designated ecological sites within the LAP boundary, polices and objective requiring the protection of designated Natura 2000 sites which are either hydrologically connected to the town or which have mobile species that might occur within the town, are set out. Policies are also set out to ensure the protection of Natural Heritage Areas (NHAs) proposed Natural Heritage Areas (pNHAs) from any development that would adversely affect their conservation and amenity value.

The policies for natural heritage for the Draft Gort LAP will generally be positive for biodiversity as it aims to protect and promote opportunities for enhancement of local biodiversity features throughout the LAP area. Specific policies to protect the status of Natura 2000 sites and their associated habitats and features are provided within the LAP which will have overall positive impacts with regard to biodiversity. Positive secondary impacts are also likely to occur in the areas of soil and water, as the protection, conservation and enhancement of biodiversity is expected to also result in protection of these resources due to the controls that would be placed on development during its implementation. Secondary impacts on landscape may also occur as a result of implementation of protective policies on the natural environment.

Objectives for green infrastructure/network, recreation and amenity are aimed at protecting, improving and enhancing open spaces and a range of facilities providing for leisure and relaxation throughout the town. These objectives are expected to result in largely positive, direct, and indirect impacts to population through the improvements to the quality of life. Indirect positive effects are also anticipated with respect to biodiversity and landscape as a result. Policies and objectives with respect to green infrastructure and open space will primarily result in direct positive impacts to population and landscape with potential indirect and / or secondary impacts with respect to biodiversity, soils and water.

7.2.10 Overview of Evaluation of Land Use Zoning Objectives

The Gort LAP 2013-2019 provides a development framework to guide the development of the town for the next six years. As part of this development framework, one of the key principles to this approach as set out in the Gort LAP is to achieve consolidated growth rates over the short to medium term through development of residential, employment, recreational, cultural, retail and educational facilities. The framework for future development of the town is provided for in the land use zoning map in **Map 1A** and **Map 1B** of the Gort LAP and associated land use zoning objectives, which have been assessed in relation to strategic environmental objectives for the subject of the SEA. The purpose of

land use zoning is to indicate to property owners, and to the general public, the types of development that the Council considers most appropriate in each zone.

Land use zoning objectives are provided for with respect to the following uses: Town Centre/Commercial, Residential Phase 1, Residential Phase 2, Business & Enterprise, Industrial, Community Facilities, Agriculture, Open Space/Recreation & Amenity and Public Utilities.

Town Centre/Commercial

Lands zoned for town centre uses are generally considered to be quite positive objectives with respect to population, climate change and material assets as they promote the consolidation and improvement of these areas and provision of services in close proximity to same, which will lend itself to the use of public transport, walking and cycling. These objectives are also likely to have indirect positive effects on landscape due to the promotion of infill development which will have a net positive effect through reduction in development of greenfield lands.

Residential Phase 1

Undeveloped Lands zoned for new residential development during the lifetime of the 2013-2019 LAP in Phase I are zoned R - Residential in Map 1A of the Draft Gort LAP. These undeveloped zoned lands include lands which have the benefit of planning permission since the 2002 LAP and have not yet been developed. R- Residential (Phase 1) zoned lands also include residentially zoned lands identified as part of the development strategy for the Gort LAP 2013-2019and to deliver on the Core Strategy allocations set out for Gort in the Galway County Development Plan. These lands also make provision for potential residential uses within pockets of land generally located in close proximity to existing residential developments.

Residential Phase 2

Map 1A of the Draft Gort LAP also makes provision for residentially zoned Phase 2 lands under zoning R2. These undeveloped lands are reserved for the longer term growth needs of the town and are generally located in more peripheral areas to the east and south of the town. According to the Gort LAP these lands will not normally be eligible for development during the lifetime of this LAP. However consideration will be given to single house developments for family members on family owned lands or where it is apparent that Residential (Phase 1) lands cannot or will not be developed within the plan period, compliance with the Core Strategy in the Galway County Development Plan, the policies and objectives in this Local Area Plan, the principles of proper planning and sustainable development and to meeting normal planning, access and servicing requirements.

The phased development of lands for residential use in accordance with Map 1A will have an overall beneficial effect on population, climate change, landscape and material assets as residential development will be developed in a planned, phased and serviced manner. This would result in high quality living environments; it promotes sustainable transport, walking and cycling and will reduce potential effects on landscape from otherwise sprawling developments throughout the environs of the town.

As with all new developments on greenfield sites, there is potential for negative effects on biodiversity, water and soils. However it is anticipated that any potential mitigation measures would be offset or mitigated against through the normal development management process.

Business and Enterprise and Industrial

Objectives for the development of business and enterprise and industrial are anticipated to have a positive direct impact on population and material assets as these land uses will help to reinforce the

town's designation as a Key Town under the Core Strategy and Regional Planning Guidelines. The zoning of these lands provides an opportunity to increase employment in these areas and as a result to improve quality of life for those living in Gort Town.

Zoning of lands for these uses in close proximity to the town in line with the LAP's development strategy supports the use of public transport and walking and cycling and will as a result reduce impacts on climate change. Secondary positive impacts on population, climate, landscape and material assets as these objectives would be expected to discourage sprawl of these uses in an unregulated manner throughout the town.

As with all new developments, development within business and enterprise and industrial zones have potential for in combination effects (along with other developments planned for the town) to have impacts on biodiversity, soil, water and landscape through pressure on wastewater systems, water supplies and through development of greenfield lands. However, any new developments on these lands would be subject to the normal development management process which is likely to offset any significant impacts associated with development of these lands.

Community Facilities

The aim of the land use zoning objective for community facilities is to protect and provide for the development of schools, religious orders and other community and educational facilities. It is anticipated that this land use zoning objective would have an overall positive effect on population as it would improve educational and community facilities serving the public. As with all new developments there is potential to impact on biodiversity, soils, landscape and water through the development of greenfield lands. However any new development would be subject to development management requirements of the LAP and the Galway CDP 2009-2015.

Agriculture

The land use zoning objective for agriculture aims to protect the rural character of the area from inappropriate development and provide for agricultural and appropriate non-urban uses.

This land use objective will have overall positive effects with respect to population and climate change they would help to maintain the quality of people's lives through high quality environments and providing recreational areas which may indirectly have positive effects on people.

This land use objective is expected to result in direct positive impacts to biodiversity. Positive and secondary impacts are also likely to occur in the areas of soil and water due to the controls that would be placed on development as a result of implementation of this objective.

Open Space/Recreation & Amenity

The land use objective for open space and amenity aims to retain and protect existing open space and recreational facilities and uses and to protect these lands from urban sprawl and ribbon development. Additionally these lands are zoned to ensure that any flood risk areas within the OS zone are appropriately managed to avoid, reduce and/or mitigate, as appropriate, the risk and potential impact of flooding.

This land use objective will have overall positive effects with respect to population and climate change. It would help to maintain the quality of people's lives through high quality environments and providing recreational areas which may indirectly have positive effects on people. This land use objectives is expected to result in direct positive impacts to biodiversity. Positive and secondary impacts are also likely to occur in the areas of soil and water due to the controls that would be placed on development as a result of implementation of this objective.

Public Utilities

The land use objective for public utilities aims to facilitate the provision and maintenance of essential public utility infrastructure, together with necessary ancillary facilities and uses, as appropriate.

Zoning of lands for public utilities is necessary to take account of existing wastewater treatment within the boundary of the LAP area. This zoning provides lands for improvements to existing wastewater infrastructure and therefore has the potential to provide positive impacts on population, biodiversity and water quality. However as with all new developments, development within public utilities zones have potential for impacts on biodiversity, soil, water and landscape through construction activities and development of greenfield lands. However, any new developments on these lands would be subject to the normal development management process which is likely to offset any significant impacts associated with development of these lands.

8 MITIGATION MEASURES

This chapter outlines the mitigation measures that will prevent, reduce, and offset as much as possible any significant adverse effects on the environment of the plan area resulting from the implementation of the Draft LAP.

Table 8.1 proposes a number of changes to the draft policies/objectives or additional new policies/objectives in order to strengthen protection of environmental resources. These have been informed by both the SEA and the AA process. Additional text is shown in bold and underlined font. Where Galway County Council has removed or added text this text is in blue font.

Recommendations	Policies, Objectives and Main Body Text (changes bold and underlined)	Changes to Policies & Objectives
Land use		
Objective LU3, LU4 and LU5	Inclusion of the word ' <u>sustainable</u> ' before development in Objective LU3, LU4, LU5.	New text accepted.
Suggest inclusion of the word ' <u>sustainable</u> ' before development		
Residential Development		
Objective RD1 – Phased Residential Development This objective could be improved by a prior commitment to undertake SEA and AA with regard to the re-zoning of Phase 2 residential development. Recommend inclusion of text within this objective to ensure that any future zoning of Phase 2 lands will be the subject of SEA or AA as part of any future variation or review of the Gort LAP.	Additional wording to this objective: The inclusion of new residential Phase 2 lands within this plan will not in any way infer a prior commitment on the part of the Council regarding their future zoning for residential purposes within any future variation or review of the Gort LAP Any future zoning of the phase II lands would also be subject to appropriate environmental assessment(s) as required under the relevant legislation.	Not accepted, already covered under existing Objectives DS3 and Objective NH1.
Community Facilities		
Policy CF2 – Community Facilities and Amenities	Community facilities and amenities projects will be facilitated in appropriate locations <u>and additionally in the</u> <u>vicinity of all new and existing</u> <u>residential development</u> , following an assessment of each proposal and, where appropriate, subject to co- operation and consultation with the local community and other relevant stakeholders, including the Department of Education and Skills, and available resources.	New text accepted.

Table 8.1: Mitigation Measures Proposed as a Result of Assessment of Policies and Objectives

Recommendations	Policies, Objectives and Main Body Text (changes bold and underlined)	Changes to Policies & Objectives
Objective CF5 – Childcare Facilities The inclusion of additional text to ensure childcare facilities are included in the vicinity of all new and existing residential development.	Facilitate and promote the development of childcare facilities in suitable locations in accordance with national policy, including the DEHLG <i>Childcare</i> <i>Facilities Guidelines for Planning</i> <i>Authorities</i> (or any updated/superseding document), <u>and in tandem and in the</u> <u>vicinity of all new and existing</u> <u>residential development.</u>	New text accepted.
Under Section 3.3.1 reference should be made to allotments and community gardens which can have a number of benefits including promoting healthy lifestyles, providing an inexpensive and local source of food and enhancing biodiversity. Recommend inclusion of wording to Objective CF6 or new objective with reference to community- managed gardens /allotments.	CF Objective: <u>Facilitate the development of</u> <u>community-managed gardens /</u> <u>allotments in the town subject to</u> <u>implementation of sustainable</u> <u>environmental practices.</u>	Not accepted
Economic Development		
Objective ED4 – Tourism Development	Encourage and facilitate the sustainable development of the tourism potential of Gort and its environs in a manner that respects, builds on, protects and enhances the cultural, built and natural heritage of the town and the local amenities within the Plan Area. Key projects and initiatives that will be supported will include: a) Support the sustainable development of a river walkway and a linear park including recreational facilities and activities that will benefit the local community and visitors to the area and enhance the tourism infrastructure in an environmentally sustainable manner that recognises the EU Water Framework Directive, water quality, Natura 2000 conservation management objectives for the Coole- Garryland Complex <u>and</u> <u>associated protected species</u> including otter and bat	New text accepted

Recommendations	Policies, Objectives and Main Body Text (changes bold and underlined)	Changes to Policies & Objectives
	b) Investigate the provision of a tourist/information centre within the town centre.	
Transport Infrastructure		
Objective TI18 – Noise Recommendation that residential dwellings in proximity to the M18 be protected through mitigation measures. Response to EPA submission.	Require all new proposed development, within 300m of roadways with traffic volumes greater than 8,220 AADT to include a noise assessment and mitigation measures if necessary with their planning application documentation. <u>Mitigation measures</u> proposed as part of M18 in order to protect the noise environment of existing residential development will be facilitated or enforced as necessary.	New text included within Objective TI18- Noise
Water		
Objective UI1 – Water Services Infrastructure Recommendation of inclusion of intention to prepare a water conservation strategy.	To prepare a water conservation strategy for the area during the lifetime of the Plan.	A Water Conservation Strategy is completed and works are on-going at present. Reference to the Water Conservation Strategy is included within of Objective UI1 – Water Services Infrastructure part a) as modified by inclusion/exclusion of blue text <u>Continue to implement</u> the Water Conservation <u>Strategy within Gort and</u> carry out improvements to the existing infrastructure and quality of the town's water supply system, including the partial network and reservoir upgrade works under the Water Conservation Rehabilitation works as proposed to commence in 2014/2015.

Recommendations	Policies, Objectives and Main Body Text (changes bold and underlined)	Changes to Policies & Objectives
Objective UI13 – Western River Basin Management Plan and Protection of Waters Recommendation of inclusion of reference to Programme of Measures within this objective.	Support the protection of water quality in accordance with the EU Water Framework Directive (2006/60/EC) and the European Communities (Water Policy) Regulations 2003 (SI No. 722 of 2003) (as amended) (or any updated legislation), including the implementation of the relevant recommendations and measures as outlined in the Western River Basin District Management Plan 2009-2015 and associated Programme of Measures (and any updated/ superseding documents). Development will only be permitted where it can be clearly demonstrated that the proposal would not have an unacceptable impact on the water environment, including surface water, groundwater quality and quantity, river corridors and associated wetlands. Galway County Council is statutorily obliged to protect the existing good quality status of the waters in the Gort area (including the Cannahowna/Gort River and tributary/stream, the Kiltartan drainage area and including the surface water catchments of the Coole-Garryland turlough (a wetland system of global significance).	Change accepted.
Recommendation that the Plan should refer to the requirements of the European Communities Drinking Water Regulations 2007.	Following text included within the Gort Town LAP: The European Communities (Drinking Water) (No. 2) Regulations 2007 (S.I. No. 278 of 2007) transpose outstanding aspects of the EU Drinking Water Directive into Irish Law by underpinning comprehensive supervision and maintenance regimes for both sanitary authority and group water scheme supplies and by providing for increased penalties for non-compliance. Achieving and improving appropriate water quality standards for the town is of significant importance to the Council.	Accepted and new text inserted into Section3.6.1 Utility and Environmental Infrastructure within the 'Context'.
Water Infrastructure		
Objective UI3WaterSupplyandWaterConservationAdditionalwordinginresponse toEPA pre-draftscreeningsubmissionrelating toissuesregarding	Ensure that new developments are adequately serviced with a suitable quantity and quality of a sustainably sourced drinking water supply, promote water conservation to reduce the overall level of water loss in the public supply and require that new domestic developments provide for water supply	New text accepted and included within Objective UI3 Water Supply and Water Conservation

	Policies, Objectives and Main Body	Changes to Policies &
Recommendations	Text (changes bold and underlined)	Objectives
existing and any proposed new water supply.	metering.Verification of the effectiveness of the remedial action programme for the current water supply scheme will be progressed in consultation with 	
Objective Ul4 – Wastewater Disposal Recommendation that the Plan reference the EPAs code of practice in relation to wastewater treatment and disposal systems for individual one of housing.	Following text included after existing text in Objective UI4: Ensure the changeover from septic tanks to mains connections in all cases where this is feasible and that all new developments utilise and connect to the existing wastewater infrastructure subject to adequate capacity prior to any connection. The provision of individual septic tanks and treatment plants in the Gort area will be strongly discouraged to minimise the risk of groundwater pollution. Where such facilities are permitted, full compliance with the prevailing regulations and standards, including the EPA's a Code of Practice: Wastewater Treatment and Disposal Systems Serving Single Houses (p.e.≤ 10), (EPA, 2009), will be required.	New text in bold and underlined is accepted. Objective UI4 Wastewater Disposal to read as follows: Restrict development that does not connect to the public sewer and discourage the proliferation of individual septic tanks and treatment plants in order to protect groundwaters, consolidate the town structure and control ribbon development along the approach roads into Gort. Implement and promote the Urban Waste Water Treatment Regulations 2001 and 2004.Ensure the changeover from septic tanks to mains connections in all cases where this is feasible and that all new developments utilise and connect to the existing wastewater infrastructure subject to adequate capacity prior to any connection. Connection to the public sewer will be encouraged as an alternative toThe provision of individual septic tanks and treatment plants in the Gort area will be strongly discouragedin order to minimise the risk of groundwater pollution. Where such facilities are permitted, full compliance with the prevailing

	Policies, Objectives and Main Body	Changes to Policies &
Recommendations	Text (changes bold and underlined)	Objectives
		regulations and standards, including the EPA's a Code of Practice: Wastewater Treatment and Disposal Systems Serving Single Houses (p.e.≤ 10), (EPA, 2009), will be required.
	Objective UI5 Wastewater Treatment	
Recommend additional text for ObjectiveUI5Wastewater Treatment Plant Buffer in order to address the issue of the town's wastewater	Plant Buffer Provide and protect a 100m buffer around the wastewater treatment plant (Public Utilities Zoning Objective) site and protect buffer zones around any other treatment plant in the town as appropriate.	Additional text accepted.
treatment plant being located within Flood Zone A.	The council will support and facilitate protection measures for the town's existing wastewater treatment plant which is located within Flood Zone A.	
New objective recommended addressing waste leakage from the system.	Develop a wastewater leak detection programme including the use of a strategic metering system to aid in leak detection.	Text modified and inserted within Objective UI1 – Water Services Infrastructure, part b)Continue to implement the water leak detection programme including the use of a strategic metering system to aid in leak detection and reduction in unaccounted for water.
New objective recommended so that the plan implements and promotes the Urban Waste Water Treatment Regulations 2001 and 2004.	Implement and promote the Urban Waste Water Treatment Regulations 2001 and 2004.	New text accepted and inserted into Objective UI4 Wastewater Disposal
Objective UI1 – Water Services Infrastructure New wording recommended to ensure that the existing wastewater treatment facility (ies) are assessed to ensure they are in good working order. Response to EPA submission Pre-draft SEA Screening Submission.	b) As development takes place monitor the <u>adequacy of the existing</u> <u>wastewater treatment facility(ies) in</u> <u>terms of both capacity and</u> <u>performance as well as potential risk</u> <u>to human health and water quality.</u> <u>Implement the recommendations in</u> <u>the Kinvara Water Management Unit</u> <u>Action Plan requiring capital works,</u> <u>implementation of performance</u> <u>management systems of the Gort</u> <u>Wastewater Treatment Plant.</u>	-Text not accepted, see modified text above in relation to Objective UI1 - Water Services Infrastructure, part b)
New objective recommended to promote Integrated Constructed Wetlands within the administrative boundary of	Promote the appropriate use of Integrated Constructed Wetlands (ICWs) within the Gort area were appropriate which follows the guidance provided by the	Not accepted.

Recommendations the LAP.	Policies, Objectives and Main Body Text (changes bold and underlined) Department of the Environment, Heritage and Local Government.	Changes to Policies & Objectives
Recommendation that the Plan should outline that any waste water treatment plant upgrade should be carried out in accordance with the Waste Water Discharge (Authorisation) Regulations 2007, S.I. No. 684 of 2007.	Following text included within the Gort Town LAP. The waste water treatment plant upgrade will be carried out in accordance with the Waste Water Discharge (Authorisation) Regulations 2007, S.I. No. 684 of 2007.	Text modified and inserted into part d) of Objective Ul1Water Services Infrastructure – Progress the upgrading of the existing wastewater treatment plant and the sewer network for the town under the Water Services Investment Programme <u>in</u> <u>accordance with the Waste</u> <u>Water Discharge</u> (Authorisation) <u>Regulations 2007, S.I. No.</u> <u>684 of 2007.</u>

Recommendations	Policies, Objectives and Main Body Text (changes bold and underlined)	Changes to Policies & Objectives
Surface Water Drainage		
Objective UI6 – Surface Water Drainage and Sustainable Drainage Systems Recommend that this policy refers to Surface Water legislation 'Environmental Objectives (Surface Waters) Regulations 2009 (S.I. No 272 of 2009).	Inclusion of following within Section 3.6.1 of the Plan: The Council will also implement all relevant Surface Water legislation including 'Environmental Objectives (Surface Waters) Regulations 2009 (S.I. No 272 of 2009). Also include at end of Objective UI6: Developers will be required to adopt site specific solutions to surface water drainage systems in all cases.	All recommended text accepted and inserted into Objective UI6 with the inclusion of ' <u>or any</u> <u>updated/superseding</u> <u>document'</u> after first section.
Flood Risk Management		
Objective UI10– Waterbodies and Watercourses Recommended the inclusion of a 10m buffer zone on all watercourses to ensure protection of this habitat.	Protect waterbodies and watercourses within the Plan Area from inappropriate development, including rivers, streams, associated undeveloped riparian strips, wetlands and natural floodplains. This will include a 10m environmental management buffers <u>between any new</u> <u>development and all watercourses</u> <u>including</u> the Cannahowna/Gort River. Promote the sustainable management and use of watercourses and avoid the culverting or realignment of these features. <u>Any hard landscaping</u> <u>proposals shall be located outside of any buffer zone areas.</u>	New text accepted and inserted into Objective UI10.
Policy UI2 – Flood Risk Management Change in wording to ensure that the recommendations from the SEA and Appropriate Assessment of the Western Catchment Flood Risk Assessment and Management Study are implemented. Response to scoping submission from the EPA.	It is the policy of Galway County Council to support, in co-operation with the OPW, the implementation of the EU Flood Risk Directive (2007/60/EC), the Flood Risk Regulations (SI No. 122 of 2010) and the DEHLG/OPW publication Flood Risk Management Guidelines 2009 (and any updated/superseding legislation or policy guidance). Galway County Council will also implement the recommendations of the <u>Western</u> Catchment Flood Risk <u>Assessment</u> <u>and</u> Management <u>Study</u> (Western CFRAMs), along with the mitigation measures and recommendations arising from the associated SEA and Appropriate Assessment. Galway County Council will also take account of the Preliminary Flood Risk Assessment (PFRA) and the Stage 2 SFRA and any recommendations and outputs arising from same that relate to or impact on the Plan Area.	New text accepted. Galway County Council will also take account of the Preliminary Flood Risk Assessment (PFRA) and, the <u>Stage 2</u> <u>Strategic Flood Risk</u> <u>Assessment for the Gort</u> <u>LAP Area and any</u> recommendations and outputs arising from same that relate to or impact on the Plan Area.

	Policies, Objectives and Main Body	Changes to Policies &
Recommendations	Text (changes bold and underlined)	Objectives
Waste Management		
New objective recommended to ensure compliance with the Galway Waste Management Plan, etc. Also include reference to EPA's National Hazardous Waste Management Plan	Objective UI17 Waste ManagementImplementthe Waste ManagementPlan for the Connaught Region 2006-2011, the Galway County Council'sLitter Management Plan 2007-2010,the National Waste PreventionProgramme, the EPA's NationalHazardous Waste Management Planandanysupersedingplans/programmes over the lifetimeof the Gort Local Area Plan.Objective UI18 Bioenergy Crops	New objective accepted UI17 Not accepted.
UIXX Bioenergy Crops Objective UI21 Renewable Energy has the potential with introduction of bioenergy crops to negatively impact on biodiversity. Recommend a new Objective UIXX specifically relating to Bioenergy.	Bioenergy crops will be facilitated only in circumstances where they avoid gene flow to wild relatives of crops in centres of diversity, that do not result in invasion by the crop into other habitats, that enhance fieldscale biodiversity, that increase landscape diversity, that do not threaten valued habitats within the local landscape, that promote the sustainable management of biodiverse habitats, that do not increase the risk of loss of primary habitats and that result in a proportionately large reduction in greenhouse gas emissions.	
Natural Heritage		
ObjectiveNH5–BiodiversityandEcological Networks(referto Maps 2A/2B)Include reference to semi- natural grasslandsnatural grasslandsandmaintenanceandenhancementofbiodiversity.Recommend to include reference to ash dieback;DAFMDAFM is introducing emergency measures under the Plant Health Directive. These new measures being introduced by the Department under Statutory Instrument will require that any ash plants imported into the country would come from an area known to be free of the disease. This would be regulated under	Support the protection and enhancement of biodiversity and ecological connectivity within the Plan Area, including woodlands, trees, hedgerows, <u>semi-natural grasslands</u> rivers, streams, natural springs, wetlands, stonewalls, geological and geo-morphological systems, other landscape features and associated wildlife where these form part of the ecological network and/or may be considered as ecological corridors or stepping stones in the context of Article 10 of the Habitats Directive: a) Seek to retain and/or incorporate these natural features into developments, in order to avoid ecological corridors and stepping stones. b) Protect and enhance the water quality and ecology of the Cannahowna/Gort River and its function as ecological corridors, by maintaining	In bold and underlined accepted, <u>semi-natural</u> grasslands And <u>maintenance and</u> <u>enhancement</u> Additionally the following text will be inserted at the end of Objective NH5, part c) <u>Seek</u> to prevent the introduction of imported ash trees/plants or other such species, into the Plan area in line with the Plant Health Directive and any other relevant legislation.

Recommendations	Policies, Objectives and Main Body	Changes to Policies &
Recommendations the EU Plant Passport system. The Department is calling on the forest nursery trade and contractors to introduce a voluntary moratorium on imported stock from continental Europe with immediate effect. Reference should be made in the text to the protection of wetlands as provided by Planning and Development (Amendment) (No. 2) Regulations 2011 S.I. No. 454 of 2011 probably under Section 3.9 Natural Heritage & Biodiversity Objective NH6 – Water Reference to wetland should be included in this abiastive	Text (changes bold and underlined)the existing banks and channel and ensuring that new developments are set back at least 10m from the top of the bank of the stream.c) Ensure maintenance and enhancementof biodiversity through the appropriate planting of native trees, shrubs and hedgerows indigenous to 	Changes to Policies & Objectives
Objective NH7 – Environmental Management Buffer Recommend inclusion of additional text to ensure protection of this habitat and in response to EPA pre-draft SEA Screening submission.	the application and implementation of a catchment planning and management approach to development and conservation, including the implementation of Sustainable Drainage System techniques for new development in the Plan Area. Protect and seek to improve the water quality in the Cannahowna/Gort River. Limit development within the environmental management buffer so as to protect the qualifying interests of all European Sites which are linked indirectly to the Gort Local Area Plan area via the Cannahowna/Gort River and to mitigate against pollution risks, reduce flooding potential and maintain habitat . Seek to ensure that a minimum setback of 10 metres is maintained on either side of the Cannahowna/Gort River, save for	The underlined text was accepted: Limit development within the environmental management buffer so as to protect the qualifying interests of all European Sites which are linked indirectly to the Gort Local Area Plan area via the Cannahowna/Gort River <u>and</u> to mitigate against pollution risks, reduce flooding potential and maintain habitat

Recommendations	Policies, Objectives and Main Body Text (changes bold and underlined)	Changes to Policies & Objectives
	be reasonably demonstrated that this	The following text was not
	setback is not feasible. The extent of	accepted by GCC as the
	the riparian buffer zone should be	10m minimum setback is
	determined in consultation with a	already set save for
		exceptional circumstances
	qualified ecologist. In the event of	where it can't be achieved:
	lighting being proposed along	
	watercourse corridors an Ecological	The extent of the riparian
	Impact Assessment (and where necessary an Appropriate	buffer zone should be determined in consultation
	Assessment) including bat and otter	with a qualified ecologist.
	survey shall be conducted by	The mejority of
	specialists. The recommendations of	The majority of
	the specialist studies shall be	recommended text is
	implemented to the greatest extent	accepted for Objective NH7
	possible No lighting will be installed	
	without prior consultation with	New underlined text modified
	NPWS and shall be in line with	and inserted into NH7as
	advances in knowledge into the	follows –
	impact of lighting on bats and other	The recommendations of
	species and also to reflect advances	the specialist studies shall
	in technology in the lighting	be implemented to the
	industry.	greatest extent possible
	Support the carrying out of a river	And with the following
	corridor habitat survey of the Cannahowna/Gort River within the	And with the following modifications -
	lifetime of the Plan.	
	1	river corridor babitat
		river corridor habitat
		survey of the
		survey of the Cannahowna/Gort River
		survey of the Cannahowna/Gort River within the lifetime of the
		survey of the Cannahowna/Gort River
	Protect important tree clusters and	survey of the Cannahowna/Gort River within the lifetime of the Plan as resources permit.
	hedgerows in the Plan Area and ensure	surveyoftheCannahowna/GortRiverwithinthelifetimeofPlan-asresourcespermit.
		surveyoftheCannahowna/GortRiverwithinthelifetimeofPlan-asresourcespermit.
	hedgerows in the Plan Area and ensure	surveyoftheCannahowna/GortRiverwithinthelifetimeofPlan-asresourcespermit.
	hedgerows in the Plan Area and ensure that development proposals take	surveyoftheCannahowna/GortRiverwithinthelifetimeofPlan-asresourcespermit.
	hedgerows in the Plan Area and ensure that development proposals take cognisance of significant trees/tree	surveyoftheCannahowna/GortRiverwithinthelifetimeofthePlan-asPlan-asresourcespermit.
	hedgerows in the Plan Area and ensure that development proposals take cognisance of significant trees/tree stands. Seek to retain natural	surveyoftheCannahowna/GortRiverwithinthelifetimeofthePlan-asPlan-asresourcespermit.
Objective NH8 – Trees,	hedgerows in the Plan Area and ensure that development proposals take cognisance of significant trees/tree stands. Seek to retain natural boundaries, including stonewalls,	surveyoftheCannahowna/GortRiverwithinthelifetimeofthePlan-asPlan-asresourcespermit.
Parkland/Woodland and	hedgerows in the Plan Area and ensure that development proposals take cognisance of significant trees/tree stands. Seek to retain natural boundaries, including stonewalls, hedgerows and tree boundaries,	surveyoftheCannahowna/GortRiverwithinthelifetimeofthePlan-asPlan-asresourcespermit.FollowingtexttisalreadycontainedwithinObjectiveNH12, so is not included:Developmentswhichproposetoremovehedgerowsshallbe
Parkland/Woodland and Hedgerows	hedgerows in the Plan Area and ensure that development proposals take cognisance of significant trees/tree stands. Seek to retain natural boundaries, including stonewalls, hedgerows and tree boundaries, wherever possible and replace with a	surveyoftheCannahowna/GortRiverwithinthelifetimeofPlan-asresourcespermit.FollowingtexttisalreadycontainedwithinObjectiveNH12, sois notincluded:Developmentswhichproposetoremovehedgerowsshallbeassessedbyasuitably
Parkland/Woodland and Hedgerows Include requirement to	hedgerows in the Plan Area and ensure that development proposals take cognisance of significant trees/tree stands. Seek to retain natural boundaries, including stonewalls, hedgerows and tree boundaries, wherever possible and replace with a boundary type similar to the existing	surveyoftheCannahowna/GortRiverwithinthelifetimeofPlan-asresourcespermit.FollowingtexttisalreadycontainedwithinObjectiveNH12, soisnotincluded:Developmentswhichproposetoremovehedgerowsssessedbyassessedbyassessedbygualifiedexpertfor
Parkland/WoodlandandHedgerowsIncluderequirementtoassesshedgerows/trees	hedgerows in the Plan Area and ensure that development proposals take cognisance of significant trees/tree stands. Seek to retain natural boundaries, including stonewalls, hedgerows and tree boundaries, wherever possible and replace with a boundary type similar to the existing boundary where removal is unavoidable. Developments which	surveyoftheCannahowna/GortRiverwithinthelifetimeofPlan-asresourcespermit.
Parkland/WoodlandandHedgerowsIncluderequirementtoassesshedgerows/treesremoval for impacts on bats	hedgerows in the Plan Area and ensure that development proposals take cognisance of significant trees/tree stands. Seek to retain natural boundaries, including stonewalls, hedgerows and tree boundaries, wherever possible and replace with a boundary type similar to the existing boundary where removal is unavoidable. <u>Developments which</u> propose to remove hedgerows shall	surveyoftheCannahowna/GortRiverwithinthelifetimeofPlan-asresourcespermit.
Parkland/Woodland and Hedgerows Include requirement to assess hedgerows/trees removal for impacts on bats and also requirement to	hedgerows in the Plan Area and ensure that development proposals take cognisance of significant trees/tree stands. Seek to retain natural boundaries, including stonewalls, hedgerows and tree boundaries, wherever possible and replace with a boundary type similar to the existing boundary where removal is unavoidable. <u>Developments which</u> propose to remove hedgerows shall be assessed by a suitably qualified	surveyoftheCannahowna/GortRiverwithinthelifetimeofPlan-asresourcespermit.
Parkland/Woodland and Hedgerows Include requirement to assess hedgerows/trees removal for impacts on bats and also requirement to replace mature trees with	hedgerows in the Plan Area and ensure that development proposals take cognisance of significant trees/tree stands. Seek to retain natural boundaries, including stonewalls, hedgerows and tree boundaries, wherever possible and replace with a boundary type similar to the existing boundary where removal is unavoidable. <u>Developments which</u> propose to remove hedgerows shall be assessed by a suitably qualified expert for potential cumulative	surveyoftheCannahowna/GortRiverwithinthelifetimeofPlan-asresourcespermit.
Parkland/Woodland and Hedgerows Include requirement to assess hedgerows/trees removal for impacts on bats and also requirement to	hedgerows in the Plan Area and ensure that development proposals take cognisance of significant trees/tree stands. Seek to retain natural boundaries, including stonewalls, hedgerows and tree boundaries, wherever possible and replace with a boundary type similar to the existing boundary where removal is unavoidable. <u>Developments which</u> propose to remove hedgerows shall be assessed by a suitably qualified expert for potential cumulative impacts on bat populations in the	surveyoftheCannahowna/GortRiverwithinthelifetimeofPlan-asresourcespermit.
Parkland/Woodland and Hedgerows Include requirement to assess hedgerows/trees removal for impacts on bats and also requirement to replace mature trees with	hedgerows in the Plan Area and ensure that development proposals take cognisance of significant trees/tree stands. Seek to retain natural boundaries, including stonewalls, hedgerows and tree boundaries, wherever possible and replace with a boundary type similar to the existing boundary where removal is unavoidable. <u>Developments which</u> propose to remove hedgerows shall be assessed by a suitably qualified expert for potential cumulative impacts on bat populations in the area.	surveyoftheCannahowna/GortRiverwithinthelifetimeofPlan-asresourcespermit.
Parkland/Woodland and Hedgerows Include requirement to assess hedgerows/trees removal for impacts on bats and also requirement to replace mature trees with	hedgerows in the Plan Area and ensure that development proposals take cognisance of significant trees/tree stands. Seek to retain natural boundaries, including stonewalls, hedgerows and tree boundaries, wherever possible and replace with a boundary type similar to the existing boundary where removal is unavoidable. <u>Developments which</u> propose to remove hedgerows shall be assessed by a suitably qualified expert for potential cumulative impacts on bat populations in the <u>area.</u> Ensure replacement planting of	surveyoftheCannahowna/GortRiverwithinthelifetimeofPlan-asresourcespermit.
Parkland/Woodland and Hedgerows Include requirement to assess hedgerows/trees removal for impacts on bats and also requirement to replace mature trees with	hedgerows in the Plan Area and ensure that development proposals take cognisance of significant trees/tree stands. Seek to retain natural boundaries, including stonewalls, hedgerows and tree boundaries, wherever possible and replace with a boundary type similar to the existing boundary where removal is unavoidable. Developments which propose to remove hedgerows shall be assessed by a suitably qualified expert for potential cumulative impacts on bat populations in the area. Ensure replacement planting of semi-mature trees where mature	surveyoftheCannahowna/GortRiverwithinthelifetimeofPlan-asresourcesPlan-asresourcespermit.FollowingtexttisalreadycontainedwithinObjectiveNH12, so is not included:Developmentswhichproposetohedgerowsshallbeassessedby asuitablyqualifiedexpertpotentialcumulativeimpactsonpopulationsin the area.The following text is includedin ObjectiveNH8:Ensurereplacement
Parkland/Woodland and Hedgerows Include requirement to assess hedgerows/trees removal for impacts on bats and also requirement to replace mature trees with	hedgerows in the Plan Area and ensure that development proposals take cognisance of significant trees/tree stands. Seek to retain natural boundaries, including stonewalls, hedgerows and tree boundaries, wherever possible and replace with a boundary type similar to the existing boundary where removal is unavoidable. Developments which propose to remove hedgerows shall be assessed by a suitably qualified expert for potential cumulative impacts on bat populations in the area. Ensure replacement planting of semi-mature trees where mature trees are removed within	surveyoftheCannahowna/GortRiverwithinthelifetimeofPlan-asresourcespermit.
Parkland/Woodland and Hedgerows Include requirement to assess hedgerows/trees removal for impacts on bats and also requirement to replace mature trees with	hedgerows in the Plan Area and ensure that development proposals take cognisance of significant trees/tree stands. Seek to retain natural boundaries, including stonewalls, hedgerows and tree boundaries, wherever possible and replace with a boundary type similar to the existing boundary where removal is unavoidable. <u>Developments which</u> propose to remove hedgerows shall be assessed by a suitably qualified expert for potential cumulative impacts on bat populations in the area. Ensure replacement planting of semi-mature trees where mature trees are removed within developments. Semi mature trees are	surveyoftheCannahowna/GortRiverwithinthelifetimeofPlan-asresourcespermit.
Parkland/Woodland and Hedgerows Include requirement to assess hedgerows/trees removal for impacts on bats and also requirement to replace mature trees with	hedgerows in the Plan Area and ensure that development proposals take cognisance of significant trees/tree stands. Seek to retain natural boundaries, including stonewalls, hedgerows and tree boundaries, wherever possible and replace with a boundary type similar to the existing boundary where removal is unavoidable. Developments which propose to remove hedgerows shall be assessed by a suitably qualified expert for potential cumulative impacts on bat populations in the area. Ensure replacement planting of semi-mature trees where mature trees are removed within	surveyoftheCannahowna/GortRiverwithinthelifetimeofPlan-asresourcespermit.

2 BS 5837:2012 Trees in relation to design, demolition and construction - Recommendations (British Standards Institution)

Recommendations	Policies, Objectives and Main Body	Changes to Policies &
	Text (changes bold and underlined)	Objectives
	and or a stem girth measurement	<u>developments</u>
	circumference of 20 centimetres or	
	larger'.	The following text not
		8
		accepted:
		Semi mature trees are
		defined by the BSI as
		<u>'Trees with an overall</u>
		height in excess of 4
		metres and or a stem girth
		measurement
		circumference of 20
		centimetres or larger'.
		New text for NH10 accepted
		with modifications, in blue,
		as follows:
		Seek to prevent the spread
		of invasive and alien invasive
		species (e.g. Japanese
		Knotweed, Himalayan
		Balsam, etc.) and noxious
	Seek to prevent the spread of invasive	weeds (e.g. Ragwort, thistle, dock, etc .and promote
	and alien invasive species (e.g.	measures to achieve this
	<u>Japanese Knotweed, Himalayan</u>	objective.
	Balsam, etc.) and noxious weeds	compliance Raise
	(e.g. Ragwort, thistle, dock, etc.) and	awareness and seek to
	promote measures to achieve this	inform developers of the
Objective NH10 – Control	objective. Ensure compliance with the	need to comply with the
of Invasive and Alien	requirements of the Noxious Weeds Act 1936, the Wildlife (Amendment)	requirements of the
Invasive Species	Act 2000 and the European	Noxious Weeds Act 1936,
New wording for invasive	Communities (Birds and Natural	the Wildlife (Amendment)
species objective	Habitats) Regulations 2011 with	Act 2000 and the European
recommended to ensure	regard to the control of noxious	Communities (Birds and
the control of alien/ invasive	weeds and non-native invasive	Natural Habitats)
species.	species. Require a landscaping plan to	Regulations 2011 (or any
Also wording included referencing relevant	be produced for developments near	updated/superseding
legislation.	waterbodies and ensure that such plans	legislation) with regard to the control of noxious
	do not include alien invasive species.	weeds and non-native
	Where the potential for spread of	invasive species.
	invasive species are identified as	Cognisance should also be
	part of a development proposal the	taken of information
	developer will be required to submit	available from The
	an invasive species management	National Invasive Species
	plan.	Database. Where the
		potential for spread of
		invasive species are
		identified as part of a
		development proposal the
		developer will be required
		to submit an invasive
		species management plan. A landscaping plan will be
		required for developments
		near waterbodies and
		nou waterboules allu

De service deficie s	Policies, Objectives and Main Body	Changes to Policies &
Recommendations	Text (changes bold and underlined)	Objectives
		ensure that such plans do not include alien invasive species.
	<u>ObjectiveNH13 – Protection of Bats</u>	The removal of specific reference to bats in Objective NH2 and the inclusion of a new objective <u>Objective NH12 –</u> <u>Protection of Bats and</u> <u>Bats Habitats</u> is accepted as modified with additional agreed text in blue. <u>Seek to protect bats and</u> <u>their roosts, their feeding</u>
Suggest inclusion of a new Objective NH13 – Protection of Bats and Bat Habitats.	and Bat Habitats Ensure that development proposals in areas which are potentially important for bats, including areas of woodland, hedgerows and watercourses, and specifically the entirety of the Plan area east of the Cannahowna/Gort River which may provide migratory/foraging pathways from Lough Cutra and Pollduagh Cave, shall be subject to suitable assessment for potential impacts on bats. This will include an assessment of the cumulative loss of habitat or the impact on bat populations and activity in the area and may include a specific bat survey. Any assessment shall be carried out by a suitably qualified professional and where development is likely to result in significant adverse effects on bat populations or activity in the area, development will be prohibited or require mitigation and/or compensatory measures, as appropriate. All development shall be required to include green infrastructure measures which provide the potential for enhancement of local bat populations.	areas, flight paths and commuting routes.Ensure that development proposals in areas which are potentially important for bats, including areas of woodland, linear features such as hedgerows, stone walls, watercourses and associated riparian vegetation including the Cannahowna/Gort River, the railway line corridor and specifically the entirety of the Plan area east of the Cannahowna/Gort River which may provide migratory/foraging pathways from Lough Cutra and Pollduagh Cave, shall be subject to suitable assessment for potential impacts on bats. This will include an assessment of the cumulative loss of habitat or the impact on bat populations and activity in the area and may include a specific bat survey. Any assessment shall be carried out by a suitably qualified
		professional and where development is likely to result in significant adverse effects on bat populations or activity in the area, development will be prohibited or require mitigation and/or compensatory measures,

December 1	Policies, Objectives and Main Body	Changes to Policies &
Recommendations	Text (changes bold and underlined)	Objectives
		as appropriate. All development shall be required to include green infrastructure measures which provide the potential for enhancement of local bat populations.
Include in main body of text reference to Green Infrastructure needed within the Plan which could be included in Section 3.9 Natural Heritage & Biodiversity. This is a	Include new objective or the following text where applicable in Objectives CF9, UD4 and NH5: Objective NHXX	Not accepted, Galway County Council consider there to be no requirement for this proposed new text as a satisfactory landscape plan is considered sufficient.
response to EPA submission. This should refer to the following documents: 'Creating Green Infrastructure for Ireland Enhancing natural capital for human wellbeing' (Comhar, 2010), 'Green Infrastructure - A quality of life issue' (IEEM, 2012), and 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages)' (DEHLG, 2009)	Require all proposals for major developments to submit, as part of the landscaping plan for the proposal, details of how any green infrastructure proposed as part of the development (e.g. green open spaces, hedgerows, tree lines, etc.) contribute positively to the development and protection of the overall green infrastructure assets of Gort Town and how it would protect and enhance linkages to the wider natural landscape features.	Reference to Ministerial Guidelines are contained within existing Policy UD1- Urban Design and Landscape
Objective CF9 – Amenity Network		
And		
Objective UD4 – Green Network and the Landscape		
Objective NH5 Biodiversity and Ecological Networks		
New Green Infrastructure Objective or include reference to GI as part of UD4, CF9 and NH5		
Recommended new green infrastructure objective or inclusion of text in existing suitable objective.	Support the development of links between larger areas of green infrastructure including important tree clusters hedgerows, watercourses and their riparian zones, the banks and buffer zones of	Text accepted and inserted as part d) of Objective NH5 - Biodiversity and Ecological Networks.

Recommendations	Policies, Objectives and Main Body Text (changes bold and underlined)	Changes to Policies & Objectives
	the railway/motorway and the surrounding countryside.	

It is recommended that all legislation, policy and guidelines outlined in both the Draft Gort LAP, and the Environmental Report are adhered to. In addition, future legislation, policy and guidelines should be fully integrated into the Draft Plan and Environmental Report where they appropriate and necessary.

9 MONITORING MEASURES

It is proposed, in accordance with the SEA Directive, to base monitoring on a series of indicators which measure changes in the environment, especially changes which are critical in terms of environmental quality, for example water or air pollution levels. Monitoring will focus on the aspects of the environment that are likely to be significantly impacted upon by the implementation of the Draft LAP. The targets and indicators are derived from the Environmental Protection Objectives (EPOs) discussed in Chapter Five and are presented in **Table 9.1** below. The target underpins the objective whilst the indictors are used to track the progress of the objective and targets in terms of monitoring of impacts.

The monitoring programme will consist of an assessment of the relevant indicators and targets against the data relating to each environmental component. Similarly, monitoring will be carried out frequently to ensure that any changes to the environment can be identified.

It is recommended that data arising from planning applications, particularly in terms of environmental constraints mapping and Environmental Impact Statements be integrated into the GIS and monitoring system. This will assist in assessing cumulative impacts also, in particular ecology and water quality. Finally, it is recommended that the monitoring report be made available to the public. It is recommended that this data be shared with neighbouring local authorities to assist in monitoring cross county effects should they arise.

Table 9.1: Monitoring and Reporting Programme

Objectives	Indicator	Target	Source/ Responsibility
Pop1 – Ensure only sufficient development is permitted, as required for in the projected increase of population within the Core Strategy targets.	Number of newly constructed developments Population Equivalent input to WWTP Also see Water and Biodiversity Indicators	Development will be restricted to provide for population increase which can be adequately catered for by Gort WwTP i.e. no development will be permitted which increases the PE input to the WwTP above 469, unless the WwTP is given an upgraded capacity.	Galway County Council
Soi1 – Protect and, where appropriate, enhance the function and quality of the soil resource in Gort.	Area of soil where function and quality is compromised e.g. where soil sealing occurs Limit net loss of groundwater recharge capability through loss of permeable soil resource.	Limit development to undeveloped Phase 1 residential areas. Restrict new development to non-sensitive areas. Change in groundwater recharge capability through development in the Town.	Galway County Council
Wat1 – Protect and enhance the status of aquatic ecosystems in line with WFD and, with regard to their water needs, terrestrial ecosystems and wetlands directly depending on the aquatic ecosystem (quality, level, flow).	Biotic Quality Rating (Q Values) and Risk Assessment of Cannahowna/Gort River Effectiveness of the remedial action programme for the current water supply scheme	Improve Q value status for river bodies in plan area and zone of influence.Aim to achieve Q4 value in line with WFD requirements by 2015.Ensure no development permitted which would lead to the exceedance of capacity of Gort WwTP.Remedial action programme for the current water supply scheme remains effective.	Galway County Council and EPA
Wat2 – Prevent pollution and contamination of ground water by adhering to aquifer protection plans.	Risk Assessment Implementation of the Programme of Measures identified under the SERBD River Basin Management Plan. Ensure wastewater collection system capacity is provided either prior to construction of new development or is developed in parallel.	No reductions in Q values in relevant watercourses. No change or improvement in groundwater quality associated with development. % increase in waters achieving 'good status' as defined in the WFD. Wastewater collection system capacity compared with wastewater collection demand from development in the town.	EPA/Galway County Council

Objectives	Indicator	Target	Source/ Responsibility
Wat3 – Reduce risk of flooding through avoidance of development in Flood Zones A or B	Number and area of developments within Flood Risk Zones Ensure that there is no development granted on lands which are outlined in the flood risk assessment as not suitable for development.	No development in Flood Zone A Developments proposed within Flood Risk Zones to comply with Floods Directive Identify SUDS in all new developments Number of developments granted permission on lands which are outlined in the flood risk assessment as not suitable for development.	Galway County Council
Bio1 – Protect, conserve and avoid loss of the diversity, range, area or population of habitats, species and wildlife corridors.	Habitat Loss e.g. loss of hedgerow, loss of mature trees, treelines, wooded areas and stone walls No significant negative impacts on designated habitats and species of Coole/Garryland cSAC/SPA Lough Cutra cSAC/SPA, East Burren Complex cSAC and other potentially impacted designated sites. No loss of locally rare species/ habitats. No net loss of green linkages/ecological networks especially rivers and hedgerows etc.	No net habitat loss Change in conservation status of qualifying habitats, species and associated environmental conditions of Coole/Garryland cSAC/SPA, Lough Cutra cSAC/SPA, East Burren Complex cSAC and other potentially impacted designated sites. Number of sites containing locally rare species/habitats Number of planning permissions with biodiversity conditions ensuring no net loss of green linkages / ecological networks	Galway County Council in consultation with the NPWS
Bio2 - Protect designated European Sites (SACs & SPAs) under Article 6 of the Habitats Directive. Conserve and protect, or maintain and restore Natura 2000 sites and the Natura 2000 Network.	Compliance with conservation objectives of European Sites through: Retaining Habitats (as above), Maintaining or improving water quality	Improvement or at least no reduction in conservation status of habitats and species of European sites No reduction in water quality AA Screening carried out for all development which have the potential to impact Natura 2000 sites	Galway County Council in consultation with the NPWS

Objectives	Indicator	Target	Source/ Responsibility
Bio3 - Conserve and protect other nature conservation sites (NHAs, pNHAs, National Parks, Nature Reserves, and Wildfowl Sanctuaries).	Habitat quantity and quality and species abundance and diversity	No net loss of habitat and species	Galway County Council in consultation with the NPWS
Bio4 – Protect habitats (terrestrial and aquatic) from non-native invasive species and prevent non-native invasive species spread.	Spread of invasive species	Survey and monitor extent and distribution of invasive species Species management plans to be submitted application for proposed development where invasive species occur	Galway County Council in consultation with the NPWS and Invasive Species Ireland
Cli1 – Contribute to mitigation of, and adaptation to, climate change and air quality issues.	Average energy consumption of new residential housing stock Tonnes of CO2 /capita/year All new development applications within areas at risk of flooding to be accompanied by a flood impact assessment. Increase access by households to public transport, including bus and rail services. Increase in number of people travelling to work and school via public transport.	Reduce greenhouse gas emissions in line with 2020 commitments % of planning applications for development in areas at risk of flooding accompanied by a Flood Impact Assessment. % of households granted planning permission within 500m of a bus service or 1km of a rail station. % increase in number of people travelling to work and school via public transport.	Galway County Council
Mat1 - To ensure that drinking water supplies are free of contamination.	 % compliance in potable water quality monitoring % compliance in wastewater discharges from municipal treatment Maximise development potential within urban envelope in order to reduce 	 100% compliance with water quality monitoring Increase in population within urban area. % unaccounted for water. Change in length of cycle lanes, length of Quality Bus Corridors and number of bus services within the Town. Increase in planning permissions making provision for renewable energy and water conservation measures. 	Corine Land Cover Project EPA Galway County Council

Objectives	Indicator	Target	Source/ Responsibility
	pressure on peripheral areas. Minimise the % of unaccounted for water. This refers to leakage from the system. Maximise length of cycle lanes, length of Quality Bus Corridors and number of bus services within the Town.		
	Increase in planning permissions making provision for renewable energy and water conservation measures.		
Mat2 - To ensure that all development is adequately serviced to EPA standards prior to discharge.	% compliance in wastewater discharges from municipal treatment	Improved % compliance	Galway County Council
H1 – Protect and conserve the cultural heritage including the built environment and settings; archaeological (recorded and unrecorded monuments), architectural (Protected Structures, Architectural Conservation Areas, vernacular buildings, materials and urban fabric) and manmade landscape features (e.g. field walls, footpaths, gate piers etc.).	% of Protected Structures 'at risk' No. of ACAs No. of archaeological sites investigated No impact on the fabric or setting of monuments on the Record of Monuments and Places (RMP) by development granted planning permission. No impacts on the architectural heritage value or setting of protected structures by development granted planning permission.	Ensure that the cultural heritage of the town is maintained and protected from damage and deterioration Number of monuments on the RMP, impacted by granted planning permissions. Number of protected structures impacted by development granted planning permission. Number of protected structures that have been demolished because of long term neglect and dereliction.	The Archaeological Survey monitoring programme, Ireland Buildings at Risk Register, Heritage Council Ireland. Galway County Council

Objectives	Indicator	Target	Source/ Responsibility
	No protected structures to be demolished because of long term neglect and dereliction.		
H2 – To ensure the restoration and re-use of existing uninhabited and derelict structures where possible opposed to demolition and new build (to promote sustainability and reduce landfill).	Number of buildings restored over lifetime of the plan	To ensure a positive increase in such development over lifetime of LAP	Galway County Council
Lan1 – Protect designated landscapes and scenic views, routes and landscape features of local value.	Number of developments impacting on designated landscapes and scenic views, routes and landscape features of local value No planning permission granted within special qualities of landscapes that materially contravene the policies or objectives of the plan, within the lifetime of the plan. No negative alteration to protected views.	Minimal negative impacts on designated landscapes and scenic views, routes and landscape features of local value Number of planning permissions granted which materially contravene the special qualities of landscapes. Number of protected views lost through development.	Galway County Council
Noi1 - To protect residents from adverse noise levels	Number of complaints regarding noise	No complaints about noise Targets as set out in Draft Noise Action Plan	Galway County Council

10 CONCLUSION

The Draft Gort LAP sets out an overall strategy, policies and objectives for the period 2013 to 2019 which seeks to provide for the long term planning and overall benefit of the town. The Final SEA Environmental Report (ER) demonstrates how environmental parameters have been addressed in the LAP preparation process to date and includes an Addendum to the ER which assesses potential environmental impacts as a result of Material Alterations to the LAP. Consultation has been undertaken at all stages and current baseline information has been described for all SEA parameters. The Environmental Report forms a key part of the consultation process and is accompanied by the Habitats Directive Assessment and Draft Gort LAP which is subject to public display.

Both policies, objectives and land use zonings in the Draft LAP, and Material Alterations, were assessed in terms of potential impacts on the environment and mitigation measures were proposed through rewording of the policies/objectives or rezoning where necessary. The mitigation measures proposed for the policies/objectives and material alterations through the SEA and AA process have been incorporated into the LAP. The SEA and Appropriate Assessment (AA) have informed the LAP through an on-going iterative process that incorporated environmental considerations and sensitivities throughout the LAP development. The SEA and HDA has been undertaken in line with the Planning and Development (Strategic Environmental Assessment) Regulations 2004 to 2011 (as amended) and the European Union (Natural Habitats) Regulations 94 of 1999, as amended SI 233/1998 and SI 378/2005. Subject to the full and proper implementation of the mitigation measures outlined in the SEA Environmental Report and its Addendum Report (and subsequently incorporated into the Gort Draft LAP), including appropriate site level investigations, it is considered that significant adverse impacts on the environment will be avoided.

The Environmental Report and its Addendum Report, which identified the likely significant effects on the environment of implementing the LAP and its Material Alterations was submitted to the Elected Members of Galway County Council for their consideration and should be read in conjunction with the Adopted Gort LAP. Subject to the full and proper implementation of the mitigation measures outlined in the ER and its Addendum Report, including appropriate site level investigations, it is considered that significant adverse impacts on the environment will be avoided. The Environmental Report and its Addendum were taken account of before adopting the Plan.