



An
Coimisiún
Pleanála

Inspector's Report

ACP-322933-25

Development	Construction of 3no offices, 1 no. cafe and 4 no. residential units
Location	Cosmona, Loughrea , Co. Galway
Planning Authority	Galway County Council
Planning Authority Reg. Ref.	2560401
Applicant(s)	Stephen O' Rourke
Type of Application	Permission
Planning Authority Decision	Refused
Type of Appeal	First Party
Appellant(s)	Stephen O Rourke
Observer(s)	Brian Geraghty
Date of Site Inspection	9 th February 2026
Inspector	Catherine Dillon

1.0 Site Location and Description

- 1.1. The subject site is located c.1km to the north west of Loughrea Town Centre in County Galway. It is located to the north east of an existing car park area serving the Loughrea Shopping Centre and to the north and west of a cul de sac housing development known as The Maltings. Both the shopping centre and The Maltings housing estate are accessed off the Regional Road (R446). The shopping centre has a further access off the Athenry Road (L81935) which connects to both the R446 to its south and the R380 Loughrea bypass to its north.
- 1.2. The site is currently in use for the storage of construction equipment and materials and there is a gate into the site from the shopping centre car park (west boundary). The subject site is enclosed by a boundary wall of varying heights along its eastern and southern boundary as viewed from The Maltings.
- 1.3. Immediately to the south of the site are a pair of semi-detached two storey houses, Nos. 27 and 28 The Maltings. To the east and south of the site is a detached two storey house No.31 The Maltings which was a later addition to the overall Maltings development.
- 1.4. There is a detached single storey office building associated with the construction yard to the north of the subject site, and a partially constructed pair of semi-detached dwellings to the rear of this building. The construction waste on the site would appear to be associated with the unfinished houses to the north of the subject site. A high boundary wall separates the subject site and the houses in Donnellan Drive to the east.
- 1.5. The subject site has a stated area of 0.15 hectares.

2.0 Proposed Development

- 2.1. The initial application lodged with the planning authority is summarised as follows:
 - Construction of a 3/4 storey mixed use development which would step down from 4 storeys at its northern end, to 3 storeys at its southern end. The fourth floor would be set in from the east and west elevations of the proposed development.

- The building would have a total height of 13.14m and would comprise 4 vertical staggered blocks with an overall length of c.27.8m and depth of 15.5m.
- It would be set in 1.4m from the southern boundary and 5.6m (at its closest point) with the flank wall of No.28 The Maltings. The overall building would be set back 24.2m from the front elevation of No. 31 The Maltings to the east.
- It would be set back 3.8m from its northern boundary.
- The building would be clad in brown/yellow brick to parapet level with a setback fourth floor clad in zinc.

Ground floor would comprise:

- 3 offices (floor area 52.6m² each) and a café (floor area 53.1m²) with frontages facing the Loughrea shopping centre car park.

Upper floors would comprise:

- Four residential units, 1 x 2 bedroom unit (114.4m²) and 3 x3 bedroom units (each 147.2m²). The apartments would have balconies on the western and eastern elevations.

- 2.2. An open space area is proposed in the north eastern corner of the site and would be separated from the proposed building by a shared home zone area extending from the end of the cul de sac with The Maltings housing development.
- 2.3. A total of 6 residential car parking spaces are indicated along the eastern elevation of the proposed building for the apartments. Seven commercial car parking spaces are indicated along the western frontage of the commercial units which would directly access onto the Loughrea Shopping Centre car park.
- 2.4. All foul and surface water pipework is stated to be connected to, and discharged by gravity, into the public infrastructure at The Maltings estate.
- 2.5. An amended layout was submitted by the Applicant to the appeal. This amended layout provides a turning bay in the proposed open space area to serve the residential development, accompanied by an engineering roads report and a design statement.

- 2.6. The Applicant also submitted with the appeal an acknowledgement email from Uisce Eireann dated 25/6/2025, regarding a pre connection enquiry. The Applicant respectively requests that this matter is dealt with by way of a condition/or a further information request as deemed appropriate by the Commission.
- 2.7. The amended layout and accompanying details submitted as part of the appeal will be considered in the overall assessment in Section 9 of this report.

3.0 Planning Authority Decision

3.1. Decision

- 3.1.1. By order dated 4th June 2025 Galway County Council refused planning permission for the development on 3 grounds as follows:

1. The Planning Authority has serious concerns that the development as proposed is an overdevelopment of the site by reason of height, bulk and overall massing which would negatively impact the visual and residential amenities of the local area. The proposed development does not satisfactorily relate to either its adjoining context or the surrounding development. Accordingly, to grant the proposed development would be detrimental to the character of the area and would contravene materially policy objectives PM 1, PM 8, PM 10, and UL2, as well as development management standards DM1 and DM2 contained in the Galway County Development Plan 2022-2028, it would detract from the visual and residential amenity of the area, as well as setting an undesirable precedent for similar future development, and therefore would be contrary to the proper planning and sustainable development of the area.

2. On the basis of information included with the planning application and having regard to the development(s) existing site vehicular entrance onto the public road and proposed traffic movements from the new car parking arrangement, in conjunction with the building proposals, resulting in the creation of additional turning movements to occur within the existing housing estate. It is considered that the potential exists for conflicting traffic movements to occur due to insufficient parking provision, set down areas, turning bays and associated circulation area to

cumulatively serve the existing development(s) and proposed development, increasing road safety hazards particularly for vulnerable road users and pedestrians. It is considered that the proposed development/service and the cumulative impact of the existing developments in its current arrangement would contravene DM standard 28, DM standard 33 and DM Standard 31 of the Galway County Development Plan in relation to the commercial premises and apartments. Accordingly. To grant the development as proposed, would endanger public safety by reason of traffic hazard, obstruction of road users or otherwise.

3. In the absence of any details submitted on file from Irish Water relating to consent to connect to the public waste and water infrastructure to serve the proposed development, it is considered that the development if permitted as proposed, would be contrary to Policy Objective WS4 and DM Standard 36 of the Galway County Development Plan, 2022-2028, and would be contrary to the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

3.2.1. Planning Reports

Zoning

- The planning officer noted the site was zoned C2 within the current Loughrea LAP, which provides for the development of commercial and complementary mixed uses on such zoning.

Design & scale

- It was considered that a four-storey development in this location would form a visually obtrusive feature in the local landscape that would not satisfactorily relate to either its adjoining context or the surrounding development and would seriously injure the visual amenities of the area. Recommended a refusal on this ground.

Foul & Waste water infrastructure

- No letter of feasibility from Irish Water for the proposed development to connect to Irish Water infrastructure included with the application details. Recommended a refusal on this ground.

Traffic

- Noted the Roads's department concerns and recommended a refusal on the traffic grounds recommended by the Roads's section.

Environmental Impact Assessment

- EIA not required.

Appropriate Assessment

- Considered that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on Lough Rea SAC & SPA, or Rahasane Turlough SAC and SPA or any other European site, and Stage 2 Appropriate Assessment was not therefore required.

Flooding

- Site is not within a fluvial, pluvial, coastal or groundwater flood vulnerable area.

3.2.2. **Other Technical Reports**

Roads Department report dated 28/5/2025:

Recommended a refusal of planning permission on traffic hazard grounds (Refusal reason No. 2 of P.A decision).

3.3. **Prescribed Bodies**

None

3.4. **Third Party Observations**

- 3.4.1. Six submissions were received to the planning application on the following grounds:

- Overdevelopment;
- Out of character with the area;
- Traffic & parking;
- Impact on local infrastructure;
- Precedent for over development;
- Loss of light & overshadowing; and
- Overlooking

4.0 Relevant Planning History

Subject site

- 4.1. **ABP Ref: 301208-18 & P.A Ref: 17/1447:** Planning permission refused by ABP on 18/1/2019 for 2 no. 'drive thru' restaurant/takeaway units (gross floor area 746sqm.)

The vehicular entrance to this development was from the car park area to the west of the subject site. The 3 grounds for refusal related to the development being contrary to C2 zoning, suitability of existing public sewer network, and car parking.

Includes the western end of the subject site and an area to its north

- 4.2. **P.A Ref:19/1872:** Planning permission granted on 4/2/2020 for development on the subject site for 2 single storey buildings, including 4no. office units and 1no. coffee shop with an overall area of 421.17 sqm and gym building with an overall area of 261.15 sqm along with ancillary signage, siteworks, boundary treatments, drainage systems and landscaping. Gross floor space of proposed works: 682.32 sqm.

The vehicular access proposed as part of this development was from the shopping centre car park. This development was not implemented but part of the site is currently occupied by a builder's office.

Lands Immediately to north and east of subject site

- 4.3. **ACP Ref: PL-500716-GY-26 & P.A Ref: 2561616:** Concurrent appeal with the Commission (lodged 3/2/2026) for the lands immediately to the north and east of this site for a three storey building comprising 2 no. offices and 1 no.cafe at ground floor

and 3 duplex units at the upper floors. This application was refused by Galway Council on 7/1/2026 subject to 4 reasons which included: overdevelopment, traffic hazard, absence of a TTA and RSA and absence of details from Uisce Eireann.

Includes No.31 The Maltings & area to north east of subject site:

- 4.4. **ABP Ref: 302111-18 & P.A Ref: 18/556:** Planning permission granted by ABP for 5 residential units on 15/01/2019. No.31 The Maltings was part of this permission, but the remaining four units were never completed. The open space area for the proposed development would include the open space area for this development.

Vehicular access to this site was via The Maltings.

5.0 Policy Context

5.1. Galway County Development Plan (GCDP) 2022-2028

- 5.1.1. The relevant Development Plan is the Galway County Development Plan (GCDP) 2022-2028. Loughrea is identified as a 'Self-Sustaining Town' within the settlement hierarchy of the CDP. Self-Sustaining Towns are below the identified Key Towns and are Level 4 within the settlement hierarchy. Such towns are described as towns with high levels of population growth and a limited employment base. The growth strategy for Loughrea is to consolidate its designation as a Self -Sustaining Town and continue to support the expansion of its employment base, and residential development will be facilitated to support the sustainable growth of the town.
- 5.1.2. Loughrea had a population increase of 9.76% from 5,062 in 2011 to 5,556 persons in 2016. The Core Strategy population allocation for the lifetime of the CDP for Loughrea is an increase of 1,400 persons with a housing allocation of 806 units, with 242 of these being delivered on infill/brownfield sites. I note Loughrea in the CDP is stated as having limited wastewater capacity but an extension of Tuam RWSS to Loughrea is stated as due for completion in the CDP by 2021 (Table 7.10 of CDP).
- 5.1.3. The main policy objectives are set out under chapters 2 (Core, Settlement & Housing Strategy), 3 (Placemaking & Urban Living), 5 (Economic Development), 6 (Transport & Movement), 7 (Infrastructure, Utilities & Environmental Protection), and 15 (Development Management).

5.1.4. Relevant policy objectives to this appeal:

CS 2: Compact Growth Through the delivery of new homes in urban areas within the existing built up footprint of settlements, by developing infill, brownfield and regeneration sites and prioritising underutilised land in preference to greenfield sites.

CS 3 Population Growth To support and manage the self-sufficient sustainable development of all settlements in a planned manner, with population growth and the development of economic, physical and social infrastructure.

SS4: Self-Sustaining Towns (Level 4) Support the development of Loughrea as a Self-Sustaining Town as outlined in the Core Strategy and Settlement Hierarchy in order to improve local employment, services and sustainable transport options in order to become a more self-sustaining settlement.

PV1: Part V Provision Policy to reserve 20% of all lands zoned for residential use, or for mixture of residential and other uses, shall be made available for the provision of social or affordable housing.

PM 1: Placemaking To promote and facilitate the sustainable development of a high-quality built environment where there is a distinctive sense of place in attractive streets, spaces, and neighbourhoods that are accessible and safe places for all members of the community to meet and socialise.

PM 4: Sustainable Movement within Towns It is a policy objective of the Planning Authority to encourage modal shift in our towns to more sustainable transport alternatives through mixed use development that enables local living and working which is well connected to sustainable transport infrastructure such as walking, cycling, public bus and rail transport.

PM 8: Character and Identity Ensure the best quality of design is achieved for all new development and that design respects and enhances the specific characteristics unique features of the towns and villages throughout the County.

PM 10: Design Quality To require that new buildings are of exceptional architectural quality, and are fit for their intended use or function, durable in terms of design and construction, respectful of setting and the environment and to require that the overall development is of high quality, with a well-considered public realm.

CGR 1: Compact Growth To require that all new development represents an efficient use of land and supports national policy objectives to achieve compact growth in towns and villages. Development of lands with no links to the town or village centre will be discouraged.

CGR 6: Density Promote the provision of higher density development in close proximity to sustainable transport corridors such as train stations.

UL 2: Layout & Design: To comply with the principles of good placemaking in delivering residential developments within the towns and villages of the county.

UL 3: Housing Mix To promote a mix of house types and sizes that appeal to all sectors of the community and contribute to a healthy neighbourhood.

WS 4: Requirement to Liaise with Irish Water – Water Supply Ensure that new developments are adequately serviced with a suitable quantity and quality of drinking water supply and require that all new developments intending to connect to a public water supply liaise with Irish Water with regard to the water (and wastewater) infrastructure required.

Chapter 15 Development Management Standards

DM Standard 1: Qualitative Assessment-Design Quality, Guidelines and Statements

Table 15.1 specifies density ranges for Self sustaining towns:

- 25 u/p/h on town centre/ infill /brownfield sites &
- 15-25 at edge of centre/greenfield sites edge of centre.
- However, all proposals shall be in accordance with the Sustainable Residential in Urban Areas 2009 and Circular 02/2021. Density is only one variable used in the assessment of development proposals.

DM 2: Multiple Housing Schemes (Urban Areas) This standard is an all encompassing standard for new development and includes guidance on density, building height, private & public open space, design innovation, landscaping, safety & security, traffic safety and management, housing layout and mix.

DM 3: Apartment Developments (Urban Areas) The design of apartment type development should be guided by the Design Standards for New Apartments - Guidelines for Planning Authorities (2018) (or as updated/superseded) in relation to all issues in relation to apartment development. In general apartments are only considered appropriate in town centres.

DM 28: Sight Distances Required for Access onto National, Regional, Local and Private Roads.

DM 31: Parking standards- Table 15.4 specifies parking space dimensions and encourages dual use parking and relaxation of parking standards for mixed use developments. Table 15.5 sets out car parking standards for developments. All developments should provide facilities for the charging of battery-operated cars at a rate of up to 20% of the total car parking spaces.

DM 33: Traffic Impact Assessment, Traffic & Transport Assessment, Road Safety Audit & Noise Assessment. In summary all new road layouts should be designed in accordance with the Design Manual for Urban Roads and Streets (DMURS) and the associated TII publications. All significant development proposals, or those that the Planning Authority consider would pose a safety risk or traffic impact shall be accompanied by road safety audits, road safety impact assessments and transport and traffic assessments.

DM 36: Public Water Supply and Wastewater Collection All new developments will be required to utilise and connect to the public water and wastewater network, where practicable. Applicants who need to get a new or modified connection to public water supply or wastewater collection infrastructure must liaise with Irish Water. In the first instance, the applicant should make a pre-connection enquiry to Irish Water in order to establish the feasibility of a connection in advance of seeking planning permission. Irish Water is not responsible for the management or disposal of storm water or ground waters.

5.2. Loughrea Local Area Plan 2024-2030

- 5.2.1. This LAP came into effect on 26th August 2024. It is the subject of a Ministerial review but this review does not impact on the subject site. This LAP reinforces the objectives outlined in the GCDP and includes a Local Transport Plan for the town.
- 5.2.2. The subject site forms part of a larger area zoned C2- commercial/mixed use. The objective for the zone is to “Provide for the development of commercial and complementary mixed uses on suitable lands that can provide focal points for the provision of services to surrounding neighbourhoods/areas and opportunities for commercial enterprises, retail developments and employment creation and which do not undermine the vitality and viability of the town centre”.
- 5.2.3. Within C2 zoned lands, office space with a floor area of (100m²-1000m²), is ‘permitted in principle’, and a café ancillary to an overall compatible development to serve the needs of the immediate area, is ‘permitted in principle’ subject to compliance with the relevant policy objectives, standards, and requirements set out in this plan and the principles of proper planning and sustainable development.
- 5.2.4. Apartments are an ‘open for consideration’ use on C2 lands. These uses will be considered subject to Policy Objective LSST 5 as appropriate.
- 5.2.5. Note 2 within the Zoning Matrix in the LAP states that a “A use that is classified as Open for Consideration is one that the local authority may permit where it is satisfied that the suggested form of development will be compatible with the policies and objectives for the zone, will not conflict with permitted uses and conforms to the proper planning and sustainable development of the area, including the policies and objectives set out in the Plan.”
- 5.2.6. Relevant policy objectives with this LAP relevant to the appeal:

LSST 5 Residential Development Phasing Support the development of lands designated as Residential (Phase 1) within the lifetime of the plan, subject to normal planning, access and servicing requirements, and reserve the lands designated as Residential (Phase 2) for the longer-term growth needs of Loughrea.

LSST 21 Business and Enterprise: To facilitate the expansion of Business and Enterprise uses in the plan area of Loughrea at suitable locations with adequate

services and facilities and a high level of access to the major road network and to public transport facilities. This would facilitate the provision of further employment opportunities in accordance with proper planning and sustainable development.

5.3. Regional Policy for the northern & western region

- 5.3.1. The Regional Spatial & Economic Strategy (RSES) 2022-2032, for this region provides a high-level development framework for the Northern and Western Region that supports the implementation of the National Planning Framework (NPF) and the relevant economic policies and objectives of Government over a 12 year strategy period.

RPO 3.1-Supports delivering compact growth and underutilised sites with an initial focus within town cores.

RPO 3.13 To support the role of smaller and medium-sized towns, which demonstrate an important role in terms of service provision and employment for their catchments within the economic function of the county.

RPO 3.2 (c) Deliver at least 30% of all new homes that are targeted in settlements with a population of at least 1,500 (other than the Galway MASP and the Regional Growth Centres), within the existing built-up footprints.

5.4. National Planning Framework (NPF) First Revision April 2025

- 5.4.1. This Plan is the Government's high-level strategic plan for shaping the future growth and development of the country to the year 2040. The NPF strategy focusses a significant proportion of population growth in Ireland's Cities, while also seeking to improve urban infrastructure and amenities, liveability/ quality of life and the quality of the built environment. Of relevance to this appeal it states that Ireland needs to ensure that it continues to provide an attractive range of enterprise development opportunities in the face of changing employment activity and sectors.

NPO 20: In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and

activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

5.5. Ministerial Guidelines

Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) (Compact Settlement Guidelines)

- 5.5.1. These Guidelines set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements. Where there are differences between these Guidelines and other previously issued Section 28 guidelines, it is intended that the policies and objectives and specific planning policy requirements (SPPR's) of the Compact Settlements Guidelines will take precedence.
- 5.5.2. Loughrea had a population of 5,556 persons in 2016 and would therefore fall within the definition of a large town (5,000 + population) within these guidelines. Table 3.5 of the Guidelines sets out the area and density ranges for suburban/urban extensions in large towns. Suburban areas are the low-density car-orientated residential areas constructed at the edge of the town, while urban extension refers to greenfield lands at the edge of the existing built-up footprint area that are zoned for residential or mixed-use (including residential) development.
- 5.5.3. It is a policy and objective of these Guidelines that residential densities in the range 30 dph to 50 dph (net) shall generally be applied at suburban and urban extension locations of Key Towns and Large Towns, and that densities of up to 80 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations (as defined in Table 3.8).
- 5.5.4. Table 3.8 of the Guidelines defines an 'accessible location' as lands within 500m (i.e., up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services. The subject site is approximately 1km from the Main Street of Loughrea, and Athenry Road is considered a high frequency bus route in the Transport Plan for Loughrea and has 2 bus stops all of which serve the Galway Bus Route 920. However, I do not consider the subject site is in a highly

accessible location and a residential density of 30-50 dph would be more applicable in this instance.

5.5.5. Specific Planning policy requirements within these guidelines include the following:

- SPPR 1-Separation Distances- a separation distance of at least 16m between opposing windows serving habitable rooms.
- SPPR 2- Apartments and duplex units shall be required to meet the private & semi-private open space requirements set out in the Sustainable Urban Housing Standards for New Apartments 2023.
- SPPR 3- Car Parking- should be minimised in city centres and urban neighbourhoods-1 space per dwelling and include visitor parking provision.
- SPPR 4 - Cycle Parking and Storage- minimum of 1 space per bedroom & include visitor parking.
- Policy and Objective 3.1 - Recommended residential density ranges.
- Policy and Objective 4.1 – Implementation of DMURS.
- Policy and Objective 4.2 - Key indicators of quality urban design and placemaking.
- Policy and Objective 5.1 - Public Open Space.10-15% of net site area

The Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2022, updated July 2023).

5.5.6. These guidelines set out national policy and standards for apartment development, in order to ensure greater consistency of national policy across local authority areas. This includes recommended standards in relation to housing mix and minimum floor areas and location.

5.5.7. For the purposes of this development, I consider the subject site lies within a peripheral and/or less accessible location. Such locations are generally suitable for limited, very small-scale (will vary subject to location), higher density development that may wholly comprise apartments, or residential development of any scale that will include a minority of apartments at low-medium densities (will also vary, but broadly, <45 dwellings per hectare net).

5.5.8. Specific Planning policy requirements within these guidelines include the following:

- SPPR1 - Apartment developments may include up to 50% one-bedroom or studio type units, (with no more than 25% as studios).
- SPPR2 –On urban infill schemes up to 0.25ha, where up to 9 residential units are proposed, (notwithstanding SPPR1), there shall be no restriction on dwelling mix.
- SPPR3 – Standards for minimum apartment floor areas- 45m² for 2 bed & 73m² for 2 bed (3P).
- SPPR4 –A minimum of 33% dual aspect units are required in more central and accessible locations, a minimum of 50% in a suburban or intermediate location and on urban infill sites of any size or on sites of up to 0.25ha planning authorities may exercise discretion to allow lower than the 33% minimum.
- SPPR5 – Specifies floor to ceiling heights (2.7m).
- SPPR6 – Specifies maximum of 12 apartments per floor per core.
- Appendix 1 – sets out the minimum requirements for aggregate floor areas, room areas and widths, storage space, private and communal amenity space.
- Car Parking – In areas that are well served by public transport, the default position is for car parking provision to be minimised, substantially reduced or wholly eliminated. This is particularly applicable where a confluence of public transport options is in close proximity.

5.5.9. The guidelines state where SPPRs are stated in the guidelines, they take precedence over any conflicting, policies and objectives of development plans, local area plans and strategic development zone planning schemes. Where such conflicts arise, such plans should be amended by the relevant planning authority to reflect the content of these guidelines and properly inform the public of the relevant SPPR requirements.

Urban Development and Building Height Guidelines for Planning Authorities (2018).

5.5.10. These Guidelines reinforce the national policy objectives of the NPF relating to compact growth and set a framework for a performance-based approach to the consideration of building height. The consolidation and densification in city and town

centres is encouraged where there is good public transport capacity and connectivity. Medium density ranges of 35-50 dwellings per hectare are recommended in suburban/edge locations.

- 5.5.11. Section 3 of these guidelines sets out development management criteria which includes the applicant demonstrating development meets the criteria in SPPR 4 in relation to greenfield or edge of city/town locations.

5.6. Other relevant National Policy & Guidance

5.6.1. Design Manual for Urban Roads and Streets (DMURS) (2019).

5.6.2. Nature-based Solutions to the Management of Rainwater and Surface Water Runoff Urban Areas Water Sensitive Urban Design Best Practice Interim Guidance Document, 2022.

6.0 Natural Heritage Designations

- 6.1.1. The subject site is not located within any European site. The closest European sites are Lough Rea SAC (site code 000304) and Lough Rea SPA (site code: 004134) which are both located approximately c.546m to the south of the site. Rahasane SAC (site code: 000322) and Rahasane SPA (site code:004089) are both c.11km to the west of the site.

7.0 EIA Screening

- 7.1.1. The proposed development has been subject to preliminary examination for environmental impact assessment (refer to Appendix 1 & 2 and Forms 1 & 2 of this report). Having regard to the characteristics and location of the proposed development and the types and characteristics of potential impacts, it is considered that there is no real likelihood of significant effects on the environment. The proposed development, therefore, does not trigger a requirement for an environmental impact assessment screening and an EIAR is not required.

8.0 The Appeal

8.1. Grounds of Appeal

- 8.1.1. A first party appeal against the decision of the Planning Authority to refuse permission has been submitted by an agent on behalf of the Applicant. The submission includes a rebuttal of the 3 refusal reasons, a Design Statement & Masterplan for the site immediately to the north¹, a Roads Engineer Report and the policy framework supporting the proposed development. The grounds of the appeal can be summarised as follows:

Refusal reason No. 1

Land Use Context & Site Suitability

- NPF targets a significant proportion of future urban development on infill/brownfield sites within the footprint of existing urban areas.
- Development meets the objective of the Loughrea LAP which seeks to deliver new housing and employment opportunities via compact growth principles.
- The proposed development meets the C2 zoning objectives of the LAP.
- Development located within the existing built-up area with easy access to social facilities, water and sewage services and proximity to footpath connectivity.
- 3 offices and cafe would be a welcome addition to the existing employment base increasing the provision of local services and promoting the 15 minute city concept, promote sustainable patterns for work and reduce the need to travel by car.
- Principle of providing infill housing is in keeping with national and local policy.
- Site located within 100m of a bus stop on Athenry Road and served by the 548, 763, 844,920 and 934 bus routes.

¹ Hardcopy of appeal submission did not include masterplan layout

- Subject site would promote the integration of land use and transportation and would not impact on the objectives of the Loughrea Local Transport Plan (LTP) which promotes more sustainable modes of travel.
- LTP identifies the Loughrea shopping car park for a future 'park and stride' site.

Placemaking, Design and Master planning

- Development addresses the surrounding context by providing a double fronted building that addresses the Loughrea shopping centre and The Maltings housing estate.
- Provides much needed typology diversity.
- Lands immediately to the north of the subject site are in the Applicant's ownership and it is intended to develop this site as Phase 2 of the overall lands and provide an additional office and complete the residential units in line with the previously permitted planning application (P.A Ref: 18556). Masterplan layout submitted in this regard (Appendix 1).
- Development ensures visual continuity and alignment with The Maltings housing to the south.
- Provides a transition in scale stepping down from 4 to 3 storeys.
- Top storey is set back reducing the visual massing.
- Development orientated on a north-south axis reducing any potential overshadowing effects and daylight and sunlight impacts.
- Provides an urban edge to Loughrea Shopping centre car park, providing enhanced streetscape and passive surveillance.

Density

- Residential density of c. 30 u/p/h is appropriate for an infill site next to public transport and within a built up area and does not constitute overdevelopment and in line with national & local policy.

Typology of units

- 3 own door small scale offices in keeping with economic aspirations of LAP.
- Residential units provide a modest mix of 2 and 3 bed units in keeping with the adjoining family units in The Maltings but providing a mix of unit type, typology, choice and cost in the area.

Architectural design, materials and layout

- Site is not located within a designated Architectural Conservation Area.
- Design & materials provide a contemporary building form reflecting the proximity of the commercial and residential area.
- Transparent nature of the ground floor commercial units with a robust textured nature of the materials above support a legible and sophisticated urban presence.
- Proposed flat roof zinc cladding and brickwork palette is consistent with the evolving built character of Loughrea and aligns with the contemporary architectural trend of the area.
- Future open space area exceeds 15% open space area by 8%.
- Home zone area provides a further 515m² of landscape space which promotes pedestrian priority, reduced traffic speeds and social interaction.
- Open space areas would be controlled by management company.

Access, circulation & parking

- Cycle parking provided for residents.
- EV charging points for 2 no. cars.
- Surface parking provided for commercial element to the west.
- Bin stores are concealed behind the perforated metal fin doors on eastern elevation.
- Emergency and service access in accordance with circulation and safety standards.

- Landscape area designed with SuDs for surface water.

Residential Standards

- Apartments exceed minimum floor & storage requirements as per Apartment Guidelines.
- 3 bed units meet private open space requirements.
- 2 bed unit falls short of minimum private space but is a generous size of apartment coupled with an ample shared open space area to the front.
- Scope to increase the size of one or both balcony areas at second floor level should this be a requirement and this could be dealt with by way of condition and include privacy screening to the south.
- Development meets NZEB standards.

Refusal reason No. 2 Transport & parking issues

- Development designed using DMURS.
- Engineering report addresses matters regarding traffic movements causing a traffic hazard.
- Residential parking complies with SPPR3 of Compact Settlement Guidelines.
- Although the commercial development car parking has a shortfall of 3 spaces contends it can avail of 'dual use' car parking from the shopping centre car parking.
- Commercial development would encourage multi trip use and reduce overall car trips.
- New turning area has been provided within the development red line boundary.
- Bicycle storage at ground level has been provided to encourage a modal shift.
- Pedestrian link footpath between the Maltings and the shopping centre has been provided to enhance permeability.

Refusal reason No.3 connection to public waste and water infrastructure

- Pre connection enquiry has been submitted to Uisce Eireann with attached acknowledgement.
- Loughrea has benefitted from the investment in the Tuam Regional Water Supply Scheme (RWSS) extension to Loughrea which was completed in 2023. References Section 2.10 of the LAP in this regard.
- Subject site is identified as a Tier 1 site in LAP and brownfield/infill site for compact growth- serviced zoned land capable of being connected to existing development services to accommodate new development.
- Infrastructure assessment in LAP and previous planning decisions indicate that site connections to public waste and water infrastructure can be accommodated.

Conclusion

- Proposal provides for a compact mixed -use development on a serviced brownfield site in keeping with the zoning designation.
- Proposed amendment addresses the deficiencies within the scheme regarding a turning area without compromising the public open space.
- Connections to water and wastewater system can be accommodated as the site is serviced.
- Proposal is well balanced and responsive to the built environment.

8.2. Planning Authority Response

None on file.

8.3. Observations

- 8.3.1. One observation was received from a resident in The Maltings on the following summarised grounds:

- Building is too large and out of character and does not fit in with the surrounding area.
- Overshadowing & loss of privacy.
- Insufficient parking for the proposed apartments will lead to vehicles being parked on the footpath and causing a traffic hazard.
- Pedestrian link will lead to the general public using The Maltings for parking to gain access to the shopping centre which will exacerbate the obstruction issues.
- Appeal submission does not resolve issues raised by Galway County Council or the residents to the planning application.

9.0 **Assessment**

9.1. **Introduction**

9.1.1. Having examined the application details and all other documentation on file, including the first party submission and third party observation, having inspected the site, and having regard to the relevant local, regional and national policies and guidance, I consider the main issues in this appeal are those relating to the P.A refusal reasons. These issues are addressed under the following headings:

- Principle of development (New Issue),
- Density, Scale, height and design of development,
- Residential amenity,
- Traffic and parking, and
- Foul water capacity and surface water infrastructure

9.2. **Principle of the development (New Issue)**

9.2.1. The subject site lies within the settlement boundary of Loughrea, a Self Sustaining Town, with a housing allocation in the core strategy of 806 units for the lifetime of the Galway County Development Plan (GCDP). The site forms part of a wider area in

the Applicant's ownership zoned C2- commercial/mixed use. As outlined in Section 5.2 above, offices with a floor space less than 100m² are 'open for consideration' and office space between 100m²-1000m² are permitted on such zoned lands. The 3 office units would each have a floor area of 52.6m² and a combined floor area of 157.8m², and as such would be acceptable in this location.

- 9.2.2. The café would have a floor area of floor area of 53.1m², and a café is permitted on C2 lands subject to it being ancillary to an overall compatible development to serve the needs of the immediate area. I consider given the size of the café and being part of the overall proposed development that it would be considered as ancillary to the development and serve the needs of the surrounding area.
- 9.2.3. Apartments are 'open for consideration' on C2 lands but will be considered subject to policy objective LSST 5 as appropriate. LSST 5 supports the development of lands designated as Residential (Phase 1) within the lifetime of the plan, subject to normal planning, access and servicing requirements, with Residential Phase 2 lands designated for the longer-term growth needs of Loughrea. The overall extent of floorspace for the residential element would be 630m² and the commercial element would be 224.8m² which would equate to only 36% of the overall proposed floorspace being commercial.
- 9.2.4. I note from the land use zoning for the town, the Residential (Phase 1) lands tend to be located within existing residential zoned lands and are either small pockets of infill lands or adjacent to existing housing developments, and these areas would provide for the housing allocation specified in the Core Strategy for the town. As the subject site does not lie within the identified Residential (Phase 1) lands, I consider given the zoning of the lands, the extent of residential floorspace is not appropriate on this site and would compromise the overall development of the commercial/mixed use zoning, and would conflict with policy objective LSST 5 as it is not on Phase 1 residential lands.
- 9.2.5. Self-Sustaining Town such as Loughrea are described as towns with high levels of population growth and a limited employment base. The growth strategy for Loughrea is to consolidate its designation as a Self-Sustaining Town and continue to

support the expansion of its employment base, removing the reliance on other areas for employment and/or services, thereby achieving a self-sufficient economy.

- 9.2.6. Both local, regional and national policy as outlined in Section 5 above, acknowledge the importance of maintaining a strong economic base within and close to towns and fostering a clustering approach to similar type enterprises in a geographical location where businesses can interrelate with similar enterprises and suppliers. It is important to retain sites in the correct location to meet the needs of businesses and employers and allow for the future development of the next cycle of commercial enterprise.
- 9.2.7. Objective LSST 21 of the Loughrea LAP seeks to facilitate the expansion of Business and Enterprise uses at appropriate locations with adequate services and facilities and with a high level of access to the major road network and to public transport facilities. The site is c.1km from the town centre, has access onto 2 regional roads, is close to the Loughrea bypass and is in close proximity to bus routes. I further note the Loughrea Shopping Centre car park has been identified as a suitable site for a local 'park and stride' site within the Local Transport Plan. A commercial development on this site would facilitate the provision of further employment opportunities in accordance with the proper planning and sustainable development. I consider it is therefore important to protect and maintain existing commercial/mixed use zoned lands such as the appeal which may not be acceptable elsewhere.
- 9.2.8. The lands to the north of the site are in the ownership of the Applicant and it is stated in the appeal submission that to assist in developing and financing the site, the Applicant has divided the site into two halves, with the intention to commence the delivery of the subject site to planning and then proceed to plan for, and develop, the remainder of the site. It is the aspiration of the Applicant to deliver Phase 2 to the north to provide additional office and/or a mixed-use scheme fronting the Loughrea Shopping centre site and to complete the residential units in line with the previously permitted floor area. I consider this is a piecemeal and adhoc approach to the development of the two sites which should be considered in tandem and phased accordingly. It would appear from the Applicant's masterplan that the two sites as

indicated would have an over provision of residential floorspace with no Part V allocation.

- 9.2.9. I would also bring to the attention of the Commission that there is a concurrent appeal to the north of the subject site (ACP Ref: 500716-GY-26) which was refused by Galway County Council for a three-storey development with commercial use on the ground floor and residential above, and is reflective of the proposed masterplan submitted with this appeal.

Conclusion

- 9.2.10. I consider the extent of residential development on this site is contrary to objective LSST 5 and LSST 21 of the Loughrea LAP and if permitted could prejudice the remainder of the level of commercial and mixed-use development on this site and the adjoining site. The proposed level of residential proposed in this location is more than 60% of the overall development and would therefore in my opinion be contrary to the zoning for the lands and would result in the site being overly developed for residential use compared to commercial use, which is an inappropriate use of the zoning given its location next to an existing commercial area and transport links.
- 9.2.11. Loughrea is a self-sustaining town which requires its economic base to 'catch up' with its high level of population growth. In planning for strategic employment growth, the NPF emphasizes it is important to identify locations where enterprise can inter alia, access competitively priced development lands, utilities, density of workers, land-take and resource/infrastructure dependency, including town centres, business parks, industrial estates and significant single enterprises. I therefore consider the proposed development is contrary to the zoning of the lands and would be contrary to objective LSST 21 of the GCDP.
- 9.2.12. I would highlight to the Commission that this is a new issue and that the P.A did not include this as a reason for refusal, other than to state the proposed development would detract from the surrounding area by reason of scale and height, traffic movements and not having consent from Uisce Eireann.

9.3. Density, Scale, Height and Design of the development

- 9.3.1. Refusal reason No.1 of the P.A related to the height, bulk and overall massing of the development and that it would detract from the visual residential amenity of the area. The first party has submitted a design statement and masterplan to provide a context for the adjoining site as part of the appeal response, and considers the proposed development is an appropriate form of development on this brownfield site.

Density

- 9.3.2. The proposed development would according to the Applicant have a density of 30 units per hectare. Notwithstanding the density as calculated, Table 15.1 of the CDP specifies density ranges for Self-Sustaining towns at 25 u/p/h on town centre/infill/brownfield sites and 15-25 u/p/h at edge of centre/greenfield sites. Nevertheless, all proposals in the CDP shall be in accordance with the Sustainable Residential in Urban Areas 2009 and Circular 02/2021 and density is only one variable used in the assessment of development proposals.
- 9.3.3. Loughrea had a population of 5, 556 in the 2016 census according to the Core Strategy. Whilst the town itself is a Level 4 settlement within the overall settlement hierarchy of Galway County, it would be classified as a Large town (i.e > 5,000+ population) according to the Compact Settlement Guidelines. Section 3.3.3 of these guidelines prioritises inter alia; the economic growth of such towns and avoiding the displacement of development generated by economic drivers to smaller towns and deliver sequential and sustainable development.
- 9.3.4. The Applicant in their submission consider the subject site a brownfield site, I however consider it is being used to store construction materials associated with the unfinished 4 houses to the north of the site. The site falls within the edge of Loughrea town and is a suburban/urban extension to the town centre and according to Table 3.5 of the Compact Settlement Guidelines, would therefore fall within the density range of 30-50 dph. However, densities of up to 80dph are open for consideration at 'accessible' suburban/urban extension locations. I consider the subject site falls within the definition of an accessible location in that it is within 500m of a reasonably frequent urban bus service, albeit not a 15 minute peak hour frequency. I therefore consider the density for any development on the site would be

within the 30-50dph as per the Compact Settlement Guidelines rather than 80dph. The proposed development is therefore on the lower end of the density range for this site.

Scale and Height

- 9.3.5. The Compact Settlement Guidelines acknowledge while considerations of centrality and accessibility will have a significant bearing on density, it is also necessary to ensure that the quantum and scale of development at all locations can integrate successfully into the receiving environment. New development should respond to the receiving environment in a positive way and should not result in a significant negative impact on character, amenity or the natural environment. The Galway CDP would reflect this approach in that density is only one variable used in the assessment of development proposals.
- 9.4. The Urban Development and Building Heights Guidelines for Planning Authorities describe the need to move away from blanket height restrictions and that within appropriate locations, increased height will be acceptable even where established heights in the area are lower in comparison. I note Section 3.2 of these guidelines provides that development proposals incorporating increased building height, should successfully integrate into and enhance the character and public realm of the area. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect. The Applicant has submitted a design statement which includes a visual assessment with the appeal submission.
- 9.4.1. Loughrea shopping centre is a two-storey flat roof building overlooking the car park area to the west of the subject site. The upper floor to the Supervalu store in the shopping centre is partially visible from No.31 The Maltings but due to its setback from the subject site's boundaries and intervening car park area, it does not appear dominant when viewed from this property and is not a prominent structure from any other viewpoint within this estate.
- 9.4.2. The prevailing character of The Maltings housing development is reflective of a suburban housing development comprising two storey semi-detached houses in relatively spacious plots. Although the proposed development would rise from three

to four storeys from the south to the north, it would be c.3.3m higher than ridge of the projecting gable to No. 27 The Maltings to the south. The four storey element would c.6m higher than the ridge of the gable to No.27 The Maltings.

- 9.4.3. Whilst I acknowledge the proposed development would step down from a four storey building to a three storey building next to No.27 The Maltings, and would be staggered with a four bay arrangement, I consider the overall scale, height, and length of the proposed development being 3/4 storeys in height with an overall length of c.27.8m would appear incongruous next to the character of the adjoining two storey semi-detached houses.
- 9.5. I note the site section drawings SOR 2025/15 submitted with the appeal include the Shopping Centre in the background being reflective of the height of the proposed development, in reality the shopping centre building is set back a minimum distance of c. 77m from the rear elevation of No.27, and c.112m from the front elevation of No.31 and therefore is not seen in the context of these houses or the overall housing estate and does not appear overly prominent or intrusive when viewed for the surrounding area.
- 9.5.1. I consider the proposed development due to its scale, height and proximity to The Maltings would appear out of character with the established two storey nature of The Maltings development. I consider the building would integrate much better with The Maltings if it were two storeys in height. However, this would involve removing a number of floors from the development and would materially change the overall development and could not in my view be addressed by way of a condition.

Layout and Design

- 9.5.2. Access to the apartments would be via the ground floor along the eastern elevation of the proposed development which faces onto The Maltings. I consider this ground floor arrangement would be out of character with the established residential estate as it would contain bin enclosures and small wc and store windows along its ground floor elevation which would face onto The Maltings. It is proposed to install vertical louvres to clad the external eastern ground floor elevation. Whilst I note the Applicant's view that the proposed development provides an element of variety in terms of typology and contemporary design approach, I have concerns that the

ground floor element of the building would appear out of character with the established own door frontage of the houses in The Maltings, and would, despite the louvre detailing, appear as the 'back of house' elevation to the commercial units along this frontage, which is inappropriate for a residential area.

- 9.5.3. The Applicant considers the proposed development provides an edge to the shopping centre, however I consider the urban edge to the shopping centre and car park is lost due to the separation distance of the subject site from the shopping centre and intervening car park, and the gap that would remain between the proposed development and the single storey office building to the north. I therefore consider the development fails to create a bookend/urban edge to the carpark area. Furthermore, the height and scale of the block is not reflective of the much lower shopping centre building and would appear incongruous rather than complementary to the shopping centre scale and design.
- 9.5.4. The revised landscape plan indicates a gate to the north and south of the development to provide for a pedestrian footpath link between The Maltings and the Loughrea Shopping Centre car park to create pedestrian permeability between both sites. The applicant has suggested that these gates can be closed at the end of the working day, or in keeping with the closing time of the shopping centre (i.e 10pm) and that this could be dealt with by way of condition. I consider the provision of a pedestrian access between both sites is to be welcomed and would recommend in the event the Commission are minded to grant planning permission that these gates are retained and kept open until the shopping centre car park is closed.
- 9.5.5. However, when the shop units close there would be no natural surveillance to this pathway. I would be concerned that the layout and design of the development would not actually allow for pedestrian safety and integration, in the absence of a comprehensive development for both sites in the Applicant's ownership. The proposed development would prejudice a more integrated approach for both the edge of the shopping centre, a connection to The Maltings and the Applicant's site to the north.
- 9.5.6. The Applicant has made reference to the new two storey office building at the entrance into the Shopping centre site being reflective of the changing nature of the

area. This building fronts the R446 and reflects the scale and height of the houses to its immediate east and the shopping centre to its west. I therefore do not consider it is comparable to the proposed development in terms of its scale or height when compared to the proposed development and its proximity to the two storey houses in The Maltings.

Conclusion

- 9.5.7. The proposed development would be on the lower end of the density permitted in this location. Notwithstanding this, I consider the proposed development represents an overdevelopment of the site and would by reason of its height, scale and design would fail to provide a continuous edge to the shopping centre car park, would appear out of character and dominant from the housing estate to the south and would not integrate with the immediate surrounding area.

9.6. Residential Amenity

- 9.6.1. No. 27 The Maltings immediately to the south of the proposed development has a window at first floor level in its northern elevation, but it is not a principal window to this house. Given the orientation of the proposed development to the north of this property I do not consider it would impact on the daylight or sunlight to this dwelling. Nevertheless, I consider it would have an overbearing impact being 3/4 storeys and set back only 1.4m from the boundary with this property. I also consider the development would appear prominent when viewed from No.31 the Maltings being set back only c.24m from the front elevation of this property.
- 9.6.2. The open space area for the proposed development would include the open space area for the development granted in ABP Ref 302111. The applicant in their appeal statement have stated it is intended this open space area would form part of Phase 2 of the lands to the north. However, by way of additional information to this appeal and to address the concerns of the Council's transportation section part of the open space area would become a turning area. The Applicant has state the turning area would be removed as part of the Phase 2 layout.
- 9.6.3. Notwithstanding this submission, this turning area encroaches into the open space area and would provide a pedestrian safety hazard and a poor residential

environment for future occupiers of the development. I note the home zone area in front of the proposed development, however, given the turning area would be used by refuse vehicles and other vehicles in The Maltings I consider there is the potential for pedestrian safety to be impacted and result in a poor arrangement for future occupiers of the development when accessing the open space area.

- 9.6.4. The proposed 2 bedroom apartment would have a private open space area on the first and second floor equating to 4.1m², which falls short of the minimum requirement of 7m² as specified in the Apartment Guidelines. I note the Applicant considers this is overcome by the generous size of this unit coupled with the open space area provided for the development but specifies this private open space area could be increased at first or second floor level by condition. If the Commission are minded to grant planning permission the balcony area to this unit could be increased at first floor level.

Conclusion

- 9.6.5. I do not consider the proposed development given its orientation would impact on the daylight or sunlight to the houses to the south, however, I consider its scale and height would appear prominent and intrusive next to the existing residential dwellings. I also consider the use of the public open space for future occupiers would be compromised as it would be used as turning head for the development and would impact on the safety of residential occupiers of the development.

9.7. Traffic and Parking

- 9.7.1. The proposed commercial element of the development would be accessed via the Loughrea Shopping centre car park and would have 7 car parking spaces along the western frontage of the development. The residential element of the development would be accessed via The Maltings housing estate and would accommodate 6 car parking spaces for the apartments. This would result in an additional 13 vehicles accessing ultimately onto the R446.
- 9.7.2. Refusal reason No. 2 by the P.A considered the development would result in a traffic hazard due to the existing vehicular access onto the public road, additional traffic movements within the housing estate, insufficient parking provision, set down areas,

turning bays and general circulation area and would be contrary to DM standards 28 (sightlines), 31 (parking standards) and 33 (DMURS compliant & RSA) .

Traffic

- 9.7.3. Appendix C of the Compact Settlement Guidelines which contains advice on supplementary information for planning applications, includes the provision of Road Safety Audits (RSA) in addition to Quality Audits for proposed developments. There is no threshold specified within these guidelines with regards to the size of a development that would require an RSA and this would suggest there is no minimum threshold. DM Standard 33 of the GCDP, requires all planning applications for significant development proposals to be accompanied by a Traffic & Transport Assessment (TTA) and Road Safety Audit (RSA) which are to be assessed in association with their cumulative impact with neighbouring developments on the road network. Although I do not consider the proposed development would fall into the category of a significant development, I do have concerns about the proposed parking layout and traffic movements associated with the development.
- 9.7.4. The Applicant has amended the parking layout in the appeal submission to include a turning area on the eastern side of the site next to the proposed public open space area. I consider this would enable vehicles for the proposed development to turn within the development thereby enabling vehicles to leave The Maltings in forward gear. I consider this turning area would also be used by existing residents' vehicles in The Maltings. The applicant in their appeal submission have stated that this turning area would be converted back to open space in the future subject to planning in the event the lands to the north are developed.
- 9.7.5. Dwg No. 500560-TY-VTR-0400 provided in the appeal submission includes a tracking/swept path analysis indicating this area could accommodate a refuge truck. However as discussed in the previous section I consider the use of the open space area as a turning head could result in a conflict with pedestrians and future occupiers of the apartment units.
- 9.7.6. The Applicant has not provided any details regarding vehicle activity associated with the development and the cumulative effect of the development on R446. This is an important regional road into and out of the town centre and has a number of bus

stops along it. However, I do not consider the addition of 13 vehicles as a result of the development would have a significant impact on the road network. There may be an increase in traffic as a result of construction works but I would consider this would be temporary.

- 9.7.7. From my site inspection the visibility splays onto R446 from The Maltings are adequate and I do not consider an additional 6 vehicles would result in a traffic hazard within The Maltings or onto the regional road. I note The Maltings has a footpath leading to the residential element of the site. I also note the visibility from the shopping centre access road onto the R446 is satisfactory. This access has a left and right turning lane from the R446 into the shopping centre road, but I do not consider an additional 7 vehicles would impact on this junction. I would therefore agree with the Applicant given the small nature of the development, a Traffic & Transport Assessment is not warranted in this instance.
- 9.7.8. The proposed parking for the commercial element of the development indicates that 5 vehicles would be vertically parked and 2 vehicles would park parallel and would directly bound the circulatory space for the adjacent shopping centre car park. Customers using these spaces would directly reverse onto oncoming traffic using the circulatory route of the car park. I consider this would be a traffic hazard to both pedestrians and vehicles and would interfere in the free flow of traffic within the shopping centre car park. This situation would be exacerbated during the construction period and in the event of deliveries by larger commercial vehicles to the proposed development and could prejudice the future 'park and stride' proposal for this car park.
- 9.7.9. The Roads Section given their knowledge of the local road conditions in the area considered the development would create a traffic hazard and endanger public safety. I would concur with this view and therefore consider a Road Safety Audit (RSA) is required in this instance. The engineering report submitted with the appeal states a RSA could be provided by way of a planning condition and the development layout amended to respond to any safety items that are raised. However, I do not consider this an acceptable approach as the development should be safety proofed before planning permission is granted as any amendments could alter the layout of the development.

9.7.10. The proposed development is small in size, nevertheless I acknowledge there would be an increase in vehicular traffic using the R446 as a result of the development. However, the subject site lies within the settlement boundary of the town, and I consider this is the most appropriate vehicular access into/out of the site. Nevertheless, I consider a Quality Audit/RSA for the proposed development is warranted in accordance with DM 33 of the GCDP with a clear focus on the pedestrian environment at the proposed turning head at The Maltings and vehicles reversing onto the shopping centre car park.

Parking

9.7.11. Table 15.5 of the CDP sets the car parking standards for various developments, and in accordance with this table, 6 no. car parking spaces would be required for the apartments and 10 no. car parking spaces for the commercial element. The proposed car parking for the apartments would comply with the CDP standard but the commercial element would be 3 spaces below the required standard. Nevertheless, I consider the proposed commercial aspect of the development could avail of the shopping centre car park and would promote the dual use of these spaces. However, there are no details regarding such measures or regarding deliveries etc., for the commercial element and there is insufficient room within the site to accommodate for the turning of such vehicles. The Applicant states the commercial development would promote the dual use of car parking spaces in the shopping centre car park, and whilst I acknowledge this would address the shortfall for customers it does not address the need for commercial vehicles.

9.7.12. I note as part of the details submitted with the appeal that 4 bicycle storage provision has been provided at ground floor level that can each accommodate 3 cycle spaces. I am satisfied that the development as stated would accommodate bicycle storage although no actual bicycle parking spaces have been indicated.

Conclusion

9.7.13. The Applicant intends to remove the turning head once planning permission has been granted for the lands to the north, however, I have assessed the development as currently presented. I consider the home zone area and open space area for the proposed residential element would be compromised by the turning head and could

result in a potential hazard to pedestrian safety. I also consider the car parking spaces for the commercial development would conflict with the circulatory space for the shopping centre car park as vehicles would reverse onto this area.

9.7.14. Although the shopping centre car park could accommodate for the deficit car parking requirement for the commercial element of the development and promote dual use of the spaces in the car park, the use of these spaces for the development would require the consent of the shopping centre for either future customers or for commercial deliveries.

9.7.15. I therefore consider the proposed development is contrary to Development Management Standard 33 of the Galway County Development Plan which requires all new road layouts to be designed in accordance with DMURS, for those developments that pose a safety risk should be accompanied by a Road Safety Audit. It would also be contrary to the advice in the Compact Settlement Guidelines which includes the provision of Road Safety Audits (RSA) in addition to Quality Audits for proposed developments.

9.8. Foul Water/ Surface Water Capacity

9.8.1. Refusal reason No.3 concerned the absence of any details from Uisce Eireann relating to consent to connect to the public water and wastewater infrastructure and being contrary to DM standard 36 in this regard. This standard requires applicants who need to get a new or modified connection to public water supply or wastewater collection infrastructure to liaise with Uisce Eireann, and in the first instance make a pre connection enquiry to establish the feasibility of a connection in advance of seeking planning permission.

9.8.2. The Applicants have submitted an email from Uisce Eireann dated 25/6/2025 acknowledging receipt of a pre connection enquiry, but no correspondence with regards feasibility. It is proposed to connect the development to the existing public wastewater and water mains at The Maltings.

9.8.3. In Section 2.10 of the Loughrea LAP, it is stated that Loughrea Wastewater Treatment Plant (WWTP) has the potential capacity availability to cater for the projected growth targets and applications will be assessed on an individual basis

considering their specific load requirements. The capacity of the wastewater network west and south of Station Road is constrained due to issues associated with a stormwater overflow at Station Road in Loughrea. Station Road is c.960m to the east of the subject site.

- 9.8.4. I accessed Uisce Eireann's wastewater capacity register (accessed 5/2/2026) and I note Loughrea WWTP has capacity, but additional analysis of applications may be required on an individual basis considering their specific load requirements. Potential availability of capacity in this case would be dependent on any additional load not resulting in a significant breach of the combined approach as set out in Regulation 43 of the Wastewater Discharge (Authorisation) Regulations 2007, which is a matter for the relevant Planning Authorities to determine.
- 9.8.5. I also accessed Uisce Eireann's water capacity register (5/2/2026) and Loughrea has available capacity to meet targeted population growth to 2034 although an improvement to the Level of service (LoS) will be required. I note the Loughrea LAP states the replacement of cast iron mains in Loughrea has recently commenced and will improve water quality and the Level of Service provided.
- 9.8.6. It is not clear from the P.A report whether the connection to the existing foul or water is or is not possible. However, I would be of the opinion there would appear to be available capacity both in the wastewater and water network based on the LAP and Uisce Eireann's register. I note in the application for 5 houses (ABP Ref: 302111-18) to the north of the subject site, was accompanied by an engineering report which indicated that there was sufficient capacity to accommodate the development.
- 9.8.7. There have been no details regarding the loading for this development on the foul or stormwater connections and although the Applicant has stated they would connect to the existing pipes in The Maltings there have been no details regarding the hydraulic calculations to verify the existing network can cater for the development. There is also an absence of detail regarding the SuDs features for the development.
- 9.8.8. Notwithstanding this, I would not agree with the Applicant's view that the zoning of the site and the previous planning decisions to grant development on this site is an indication that connection to this infrastructure can be sufficiently accommodated on the site, as the previous developments were accompanied by engineering reports

with the hydraulic loads specified. Furthermore, as outlined previously in Section 9.2 of this report, the subject site is not identified within the Phase 1 residential zoning of the Loughrea Settlement Plan which in the interests of orderly and sustainable development would be given priority for residential development.

Conclusion

9.8.9. The Applicant considers in the absence of an agreement from Uisce Eireann that the matter can be dealt with by way of condition or further information pending feedback from Uisce Eireann. There has been no confirmation of feasibility from Uisce Eireann to the development and the Applicant has not demonstrated satisfactorily that there is capacity within the existing drainage infrastructure to deal with the development. I therefore do not consider the Applicant has addressed this refusal reason by the P.A.. However, if the Commission are minded to grant planning permission a condition could be attached requiring a feasibility assessment be submitted from Uisce Eireann prior to the commencement of the development.

10.0 **AA Screening**

10.1. In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that the proposed development individually or in combination with other plans or projects would not be likely to give rise to significant effects on Lough Ree SAC and SPA or Rahasane Turlough SAC and SPA in view of the conservation objectives of these sites and is therefore excluded from further consideration. Appropriate Assessment is not required.

10.2. This determination is based on:

- The separation distance between the European sites and the discharge location from Loughrea WWTP.
- The significant dilution of waters from the Kilcolgan River and other tributaries to the Natura 2000 Sites.
- The location of the site within an urban area removed from any waterbodies and lack of any hydrological connectivity to any European site.
- No potential for ex situ impacts.

- The proposed development would not affect the attainment of the conservation objectives or prevent or delay the restoration of favourable conservation conditions for the qualifying species and habitats for the Lough Rea SAC or SPA or the Rahasane Turlough SAC and SPA.

10.3. Please refer to Appendix 3 of this report for Appropriate Assessment Screening.

11.0 Water Framework Directive

11.1.1. I have assessed the proposed development and have considered the objectives as set out in Article 4 of the Water Framework Directive which seek to protect and, where necessary, restore surface and ground water waterbodies in order to reach good status, and to prevent deterioration.

11.1.2. Having considered the nature, scale and location of the project, I am satisfied that it can be eliminated from further assessment because there is no conceivable risk to any surface and/or groundwater water bodies either qualitatively or quantitatively.

11.1.3. The reason for this conclusion is as follows:

- The moderate scale of the works.
- Lack of direct hydrological connections and implementation of standard construction measures.

11.1.4. Refer to Appendix 4 of this report for WFD screening.

12.0 Recommendation

12.1. I recommend that planning permission is refused for the reason outlined below.

13.0 Reasons and Considerations

1. The level of residential development proposed as part of the development on a site that is currently zoned for commercial/mixed use within the Loughrea Local Area Plan 2024-2030, is considered to be excessive. It is considered the adhoc and piecemeal approach to the development of the zoned lands would prejudice the future viability of these lands and would be contrary to policy objectives LSST

5 and LSST 21 of the Loughrea Local Area Plan, which seeks to provide housing on Phase 1 lands and to facilitate the expansion of business and enterprise uses in the plan area of Loughrea at suitable locations with adequate services and facilities with a high access to major road networks and public transport facilities to provide further employment opportunities. As such the proposed development would undermine the role and function of the zoned lands and would be contrary to the proper planning and development of the area.

2. The proposed development, by reason of its overall scale, height and design layout, is an overdevelopment of the site and would appear overbearing, dominant and out of character with the adjoining two storey residential development in The Maltings and provide a weak urban edge to the shopping centre car park area. The development would result in a substandard form of development providing a poor quality of residential amenity to the future occupiers by reason of the open space area being shared with a turning area and would appear overbearing to the existing residential occupiers of the adjoining residential properties. The development would be contrary to policy objectives PM 1(Placemaking), PM 8 (Character & Identity), PM 10 (Design Quality), UL 2 (Layout & Design) and DM 2 of the Galway County Development Plan 2022-2028 and would be contrary to the proper planning and development of the area.
3. In the absence of a Road Safety Audit or DMURS quality audit, there is the potential for additional traffic movements to occur onto the circulatory route for the adjoining shopping car park area and along The Maltings housing estate which could impact on pedestrian and traffic safety and endanger public safety by reason of a traffic hazard to pedestrians and road users. The development would therefore be contrary to DM 33 of the Galway County Development Plan 2022-2028 and to the proper planning and sustainable development of the area.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence me, directly or indirectly, following my professional

assessment and recommendation set out in my report in an improper or inappropriate way.

Catherine Dillon
Planning Inspector
17th February 2026

14.0 Appendix 1 - Form 1- EIA Pre-Screening

Case Reference	ACP 322933-25
Proposed Development Summary	Construction of a 3/4 storey building comprising 3 offices & a café on the ground floor and 4 residential units on the upper floors and associated works.
Development Address	Cosmona, Loughrea, Co.Galway
	In all cases check box /or leave blank
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (that is involving construction works, demolition, or interventions in the natural surroundings)	<input checked="" type="checkbox"/> Yes, it is a 'Project'. Proceed to Q2.
	<input type="checkbox"/> No, No further action required.
2. Is the proposed development of a CLASS specified in Part 1, Schedule 5, Planning and Development Regulations 2001 (as amended)?	
<input type="checkbox"/> Yes, it is a Class specified in Part 1. EIA is mandatory. No Screening required. EIAR to be requested.	State the Class here
<input checked="" type="checkbox"/> No, it is not a Class specified in Part 1. Proceed to Q3	
3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?	
<input type="checkbox"/> No, the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed type of proposed road development under Article 8 of the Roads Regulations, 1994. No Screening required.	
<input type="checkbox"/> Yes, the proposed development is of a Class and meets/exceeds the threshold. EIA is Mandatory. No Screening Required	
<input checked="" type="checkbox"/> Yes, the proposed development is of a Class but is sub-threshold. Preliminary examination required. (Form 2) OR	Schedule 5, Part 2, Class 10b(i) Construction of more than 500 dwelling units. Class 10(b)(iv) Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.

If Schedule 7A information submitted proceed to Q4. (Form 3 Required)	
4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?	
Yes <input type="checkbox"/>	Screening determination remains as above (Q1 to Q4)
No <input checked="" type="checkbox"/>	Pre-screening determination conclusion remains as above (Q1 to Q3)

Inspector: _____ Date: _____

14.1. Appendix 2 Form 2 - EIA Preliminary Examination

Case Reference	ACP 322933-25
Proposed Development Summary	Construction of a 3/4 storey building comprising 3 offices & a café on the ground floor and 4 residential units on the upper floors and associated works.
Development Address	Cosmona, Loughrea, Co.Galway
This preliminary examination should be read with, and in the light of, the rest of the Inspector's Report attached herewith.	
Characteristics of proposed development (In particular, the size, design, cumulation with existing/ proposed development, nature of demolition works, use of natural resources, production of waste, pollution and nuisance, risk of accidents/disasters and to human health).	<p>The area of the site is given as 0.15ha and is located within a mixed-use zoning within Loughrea LAP boundary.</p> <p>There are no significant demolition works involved, and there is no identified risks of accidents or disasters, nor is there any obvious risks to human health that result from the proposed development.</p> <p>Given the size of the overall development and site area the proposed development will not give rise to the production of significant waste, emissions or pollutants.</p>
Location of development (The environmental sensitivity of geographical areas likely to be affected by the development in particular existing and approved land use, abundance/capacity of natural resources, absorption capacity of natural environment e.g. wetland, coastal zones, nature reserves, European sites, densely populated areas, landscapes, sites of historic, cultural or archaeological significance).	<p>The proposed development is located to the north of Loughrea town centre (c.1km) The prevailing context of the area is commercial to the west and residential to the south, east and north.</p> <p>Loughrea SAC & SPA is c. 546m to the south of the site. The Kilcogan river lies c.1km to the east of the site and flows in a northerly direction away from Loughrea.</p> <p>There are no sensitive ecological locations in the immediate vicinity.</p> <p>The site is not located within a Flood zone. There is no evidence of archaeology within or close to the site. There are no sites of cultural significance within or close to the site.</p> <p>The proposal would therefore be unlikely to have an impact on areas of environmental sensitivity.</p>
Types and characteristics of potential impacts (Likely significant effects on environmental parameters, magnitude and spatial extent, nature of impact, transboundary, intensity and complexity, duration,	<p>Having regard to the location of the subject site noise, dust and vibration emissions are likely during the construction phase.</p> <p>However, any impacts would be local and temporary in nature and the implementation of standard construction practice measures would satisfactorily mitigate potential impacts.</p>

cumulative effects and opportunities for mitigation).	Having regard to the above and lack of significant environmental sensitivities of the site and absence of significant effects and in combination effects, there is no potential for significant effects on the environment listed on Section 171A of the Act.
Conclusion	
Likelihood of Significant Effects	Conclusion in respect of EIA
There is no real likelihood of significant effects on the environment.	EIA is not required.

Inspector: _____ Date: _____

14.2. Appendix 3: Appropriate Assessment Screening

Screening for Appropriate Assessment Test for likely significant effects	
Step 1: Description of the project and local site characteristics	
Brief description of project	Construction of a 3/4 storey building comprising 3 offices & a café on the ground floor and 4 residential units on the upper floors and associated works.
Brief description of development site characteristics and potential impact mechanisms	<p>The site is located c.1km to the north west of Loughrea town centre on zoned commercial lands. The surrounding area is characterised by a mix of uses.</p> <p>The subject site is located c. 546m to the north of Lough Rea SAC & SPA. Rahasane SAC & SPA are c.11km as the crow flies to the west of the subject site.</p> <p>There are no existing watercourses on or immediately adjoining the site. The nearest watercourse is the Doogarraun (Kilcolgan) watercourse c.978m to the north of the site which flows in a westerly direction into the Carrowmore which is c.1.5km to the west of the site and flows in a northerly direction away from Lough Rea towards Rahasane SAC & SPA and then into Galway Bay.</p> <p>The River Kilcolgan is located c.1.2km to the east of the site which flows in a northerly direction away from Lough Rea.</p> <p>All surface and foul water is to connect to the existing surface water drain and foul water drain at The Maltings estate. The foul water would be connected at WWTP in Ballygasty c.1.5km north of Loughrea town centre and would flow into St. Cleran's river which forms part of the Kilcolgan river catchment.</p>
Screening report	No
Natura Impact Statement	No
Relevant Submissions	None
Planning Authority	No objection on AA grounds.
Step 2. Identification of relevant European sites using the source-pathway-receptor model The following European sites are potentially within a zone of influence of the proposed development.	

Site 1: Rahasane Turlough SAC Turloughs	<u>Direct:</u> None <u>Indirect:</u> The SAC is hydrologically connected to the site via a discharge from Loughrea WWTP via the Kilcolgan river. This may lead to a potential impact on water quality in terms of increased nutrients. Loughrea WWTP is already the subject of regular exceedances to its emission limit values.	There is a 14km separation between the discharge point and its downstream connection into the SAC meaning the effect of any potential indirect impact is highly unlikely to be of any significance due to dilution and dispersal along the course of the river.
Likelihood of significant effects from proposed development (alone)? No		
If No, is there likelihood of significant effects occurring in combination with other plans or projects? No		
Possibility of significant effects (alone) in view of the conservation objectives of the site? No		
	Impacts <u>Direct:</u> None <u>Indirect:</u> The SPA is hydrologically connected to the site via a discharge from Loughrea WWTP to the Kilcolgan river. This may lead to a potential impact on water quality in terms of increased nutrients. Loughrea WWTP is already the subject of regular exceedances to its emission limit values.	Effects There is a 14km separation between the discharge point and its downstream connection into the SPA meaning the effect of any potential indirect impact is highly unlikely to be of any significance due to dilution and dispersal along the course of the river.
Likelihood of significant effects from proposed development (alone)? No		
If No, is there likelihood of significant effects occurring in combination with other plans or projects? No		
Possibility of significant effects (alone) in view of the conservation objectives of the site? No		
Loughrea SAC Hard oligo-mesotrophic waters with benthic vegetation of Chara spp. [3140]	Impacts <u>Direct:</u> None <u>Indirect:</u> During the construction & operational phase there is	Effects Potential for negative impact on water quality, which could have a negative impact on the hard water lake at Loughrea.

<p>Conservation Objective to maintain or restore favourable conservation condition</p>	<p>the potential for surface water run off into Loughrea SAC.</p>	<p>The site synopsis from the NPWS (accessed 5/2/2026) indicates that the habitat in Loughrea is mainly impacted by agricultural run off and nutrient input from the town of Loughrea & boating activities. From the EPA mapping, there appears to be no surface water connection between the site and Loughrea SAC.</p> <p>It is my opinion that the development will not have significant effects on the conservation objectives of the SAC.</p>
<p>Likelihood of significant effects from proposed development (alone)? No</p>		
<p>If No, is there likelihood of significant effects occurring in combination with other plans or projects? No</p>		
<p>Possibility of significant effects (alone) in view of the conservation objectives of the site? No</p>		
<p>Loughrea SPA Coot [A125] Shoveler [A056] Wetland and Waterbirds [A999]</p>	<p>Impacts</p> <p><u>Direct:</u> None</p> <p><u>Indirect:</u> During the construction & operational phase there is the potential for surface water run off into Loughrea SPA and noise.</p>	<p>Effects</p> <p>Potential for negative impact on water quality, which could have a negative impact on the hard water lake at Loughrea.</p> <p>The site is not a habitat or foraging area or the Coot or Shoveler.</p> <p>Given the separation distances from the site, waterbirds would not be impacted with regards to noise.</p>
<p>Likelihood of significant effects from proposed development (alone)? No</p>		
<p>If No, is there likelihood of significant effects occurring in combination with other plans or projects? No</p>		
<p>Possibility of significant effects (alone) in view of the conservation objectives of the site? No</p>		
<p>Step 4 Conclude if the proposed development could result in likely significant effects on a European site</p>		

I conclude that the proposed development (alone) would not result in likely significant effects on the Rahasane SAC & SPA or Lough Rea SAC or SPA. The proposed development would have no likely significant effect in combination with other plans and projects on any European sites. No further assessment is required for the project. No mitigation measures are required to come to these conclusions.

Screening Determination

Finding of no likely significant effects

In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that the proposed development individually or in combination with other plans or projects would not be likely to give rise to significant effects on the Rahasane SAC & SPA or Lough Rea SAC or SPA in view of the conservation objectives of these sites and is therefore excluded from further consideration.

Appropriate Assessment is not required.

This determination is based on:

- The separation distance between the European sites and the discharge location from Loughrea WWTP.
- The significant dilution of waters from the Kilcolgan River and other tributaries to the Natura 2000 Sites.
- The location of the site within an urban area removed from any waterbodies and lack of any hydrological connectivity to any European site.
- No potential for ex situ impacts.
- The proposed development would not affect the attainment of the conservation objectives or prevent or delay the restoration of favourable conservation conditions for the qualifying species and habitats for the Lough Rea SAC or SPA or the Rahasane Turlough SAC and SPA.

14.3. Appendix 4 Water Framework Directive (WFD) Screening

WFD IMPACT ASSESSMENT STAGE 1: SCREENING			
Step 1: Nature of the Project, the Site and Locality			
An Coimisiun Pleanála ref. no.	322933-25	Townland, address	Cosmona, Loughrea, Co.Galway
Description of project		Construction of a 3/4 storey building comprising 3 offices & a café on the ground floor and 4 residential units on the upper floors and associated works.	
Brief site description, relevant to WFD Screening,		<p>The site is located on lands currently in use as a builders storage yard on zoned lands within the settlement boundary of Loughrea, Co.Galway.</p> <p>The nearest watercourse is the River Kilcolgan located c.995m to the north of the site beyond the R446, and c.1km to the west and east of the site. This river and its tributaries flow in a north/west direction past the site towards Galway Bay.</p> <p>The most recent analysis from the Killilan Bridge monitoring station (code: RS29K010200), taken in 2024 and upstream of the development site, had a Q2-3 status.</p> <p>The other monitoring station White Mill N of Loughrea, (RS29K010100) to the north east of the Kilcolgan river and east of the site had a Q value of 3 taken in 2000.</p>	
Proposed surface water details		<p>Surface water to be connected to and discharged into the public surface water drain in The Maltings.</p> <p>No SuDS measures indicated.</p>	
Proposed water supply source & available capacity		<p>It is proposed to connect to the public water supply. A pre-connection enquiry application was submitted for the water connection (Appendix of appeal submission).</p> <p>Uisce Eireann's water capacity register (accessed 5/2/2026) indicates Loughrea has available capacity to meet targeted population growth to 2034 although an improvement to the Level of service (LoS) will be</p>	

	required. LAP states the replacement of cast iron mains in Loughrea has recently commenced and will improve water quality and the Level of Service provided.
Proposed wastewater treatment system & available capacity, other issues	<p>The WWTP is located in Ballgasty c.1.5km north of Loughrea town centre and flows into St.Cleran's river which flows into the Kilcolgan river and is within the Kilcolgan river catchment. St.Cleran's river is c.2km to the east of the subject site. The WwTP according to AEP report (accessed 5/2/2026) has a capacity PE of 9,500.</p> <p>Foul water to flow via gravity before connecting to foul water drainage network located at The Maltings.</p> <p>A pre connection enquiry application was submitted for the foul water loading to Uisce Eireann (Appendix of appeal submission).</p> <p>Uisce Eireann's wastewater capacity register (accessed 5/2/2026) states Loughrea WWTP has capacity but additional analysis of applications may be required on an individual basis considering their specific load requirements.</p>
Other issues	The Annual Environmental Report for Loughrea WwTP (D0194-01) dated 14/8/2025 states the WWTP is non-compliant with the ELV's set in the Wastewater Discharge Licence. The monitoring report notes the WWTP has exceeded ELVs for BOD and Ammonia levels. A deterioration in water quality has been identified but it is not known whether this is caused by the WwTP. However, this report states 'The discharge from the wastewater treatment plant does not have an observable negative impact on the Water Framework Directive status.'

Step 2: Identification of relevant water bodies and Step 3: S-P-R connection

Identified water body	Distance to (m)	Water body name(s) (code)	WFD Status	Risk of not achieving WFD Objective e.g.at risk, review, not at risk	Identified pressures on that water body	Pathway linkage to water feature (e.g. surface run-off, drainage,

						groundwater)
Surface Waterbody	c.972m (north) & c.1km (west)	Kilcolgan IE_WE_29K010400	Poor	At Risk	UWW, Ag, DWTS, HYMO, Ind	Hydrologically connected via WwTP
	c.1km (east)	Kilcolgan IE_WE_29K010100	Moderate	At Risk	HYMO, UR	Hydrologically connected via WwTP
Lake Waterbody	c.540m(south)	Rea	Moderate	Not at risk	No pressures	River flows out of lake towards WwTP- unlikely to impact lake
Groundwater waterbody	Underlying site	GWDTE- Rahasane Turlough IE_WE_G_0100	Good	At Risk	DWTS, Ag	No- all surface water to connect to public drain
Step 4: Detailed description of any component of the development or activity that may cause a risk of not achieving the WFD Objectives having regard to the S-P-R linkage.						
CONSTRUCTION PHASE						

No	Component	Water body receptor (EPA Code)	Pathway (existing and new)	Potential for impact/ what is the possible impact	Screening Stage Mitigation Measure*	Residual Risk (yes/no) Detail	Determination** to proceed to Stage 2. Is there a risk to the water environment? (if 'screened' in or 'uncertain' proceed to Stage 2.
CONSTRUCTION STAGE							
1.	Surface	Kilcolgan IE_WE_29K0104 00	Pathway exists via WWTP		N/A	No	Screened out
2.		Kilcolgan IE_WE_29K0101 00	As above	N/A	N/A	No	Screened out
3	Lake	Rea	No	N/A	N/A	No	Screened out
3.	Ground	GWDTE- Rahasane Turlough IE_WE_G_010 0	Yes	Hydrocarbon spillages/ siltation etc	Standard construction best practices	No	Screened out
OPERATIONAL PHASE							
1	Surface	Kilcolgan IE_WE_29K0104 00	Yes via wastewater discharge	Capacity in WwTP	No	No	Screened out
2.		Kilcolgan IE_WE_29K0101 00	As above	As above	No	No	Screened out
3.	Ground	IE_SE_G_0100	No pathway to groundwater-	Hydrocarbon spillages from car park areas	Mitigation measures would require petrol interceptor before	No	Screened out Petrol interceptor would be required

					discharge into SW.		to be provided as part of development subject to condition. Stormwater connections flow north from Lough Rea.
DECOMMISSIONING PHASE							
N/A							