

Response to Further Information

ABP-320946-24 Outdoor
Amenity Enhancement
Project at Long Point,
Loughrea, Co. Galway





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1.

INTRODUCTION

This report was prepared on behalf of the applicant, Galway County Council, in response to the request for Further Information from An Coimisiún Pleanála (formerly An Bord Pleanála) with regard to ABP-320946-24 which relates to the Outdoor Amenity Enhancement Project at Long Point, Loughrea, Co. Galway. The development description as per the public notices is as follows:

Pursuant to the requirements of Section 177AE(4)(a) of the Planning and Development Act 2000 (as amended), notice is hereby given that Galway County Council proposes to seek approval from An Bord Pleanála to carry out the following development at Long Point, Lake Road (R351) in the townland of Knockanima, Loughrea, Co. Galway.

The development will consist of the following:

- 1. Repair works comprising:
 - a. Repair of the existing pier surfaces.*
 - b. Repair of the existing slipway to provide safe launching point for kayaks and stand-up paddle boards.**
- 2. Demolition of an existing changing shelter to facilitate passive surveillance and views of Lough Rea.*
- 3. Alteration to existing toilet and shower building to provide storage, plant, and a changing places toilet (accessible toilet, shower and changing facility) (93 sqm).*
- 4. Provision of new changing, toilet and shower facilities in a single storey building (86 sqm) including sheltered outdoor shower changing area.*
- 5. Provision of a lifeguard station building (16 sqm).*
- 6. Provision of a circular viewing deck to the south of the existing pier.*
- 7. Provision of a totem sign extending to c. 4 metres in height.*
- 8. Alteration to existing beach area and provision of a deck, steps and ramp to water's edge and beach area for access for all to the water.*
- 9. Provision of a shared active travel route along the sites eastern boundary adjacent to the Lake Road (R351) and the provision of designated bicycle parking spaces.*
- 10. Removal of 2 no. existing vehicular access points and alterations and junction upgrade works to the existing central access point, and provision of internal pedestrian crossings.*
- 11. Reconfiguration of and upgrades to the existing car parking areas to provide increased parking provision and to accommodate age friendly and set down spaces and trading bays, and the provision of 1 no. new car parking area which includes EV charging and accessible parking spaces.*
- 12. Provision of hard and soft site landscaping works, SuDS measures, pumping and water stations all connections, public lighting, PV panels at roof level and site services.*
- 13. All ancillary services and associated site development works.*

A Natura Impact Statement has been prepared in respect of the proposed development.

An Environmental Impact Assessment Screening Report has been undertaken in respect of the proposed development and concluded that an Environmental Impact Assessment Report is not required.

The report replies on a point-by-point basis to the 7 no. items as set out in the letter received from the Planning Authority dated the 20th November 2024. The report also responds to the matters raised in the 3 no. submissions received during the statutory consultation period.

An extension of time was sought from An Coimisiún Pleanála on the 17th of January 2025 due to the difficulty in appointing a suitably qualified archaeologist within the original timeframe. An Coimisiún Pleanála granted an extension of time until the 16th of May 2025. A second extension of time request was sought on the 23rd of April 2025, which was subsequently granted with a new deadline of the 16th of July 2025. This response to further information is submitted ahead of the deadline of 17:30pm on the 16th of July 2025.

2.

FURTHER INFORMATION ITEM 1

Environmental Baseline

Galway County Council shall submit further data relating to the nature, distribution and extent of terrestrial, benthic/lacustrine and fringe habitats in the location of, proximate to, and in the wider vicinity of each element of the proposal within the Special Area of Conservation (SAC) and immediately adjacent to the SAC. The submitted baseline should be clear in defining the extent of:

- i) The overlap between the application boundary, the SAC boundary and the Annex I habitat as published.*
- ii) Annex I habitats, as defined by distribution of species described as characteristic of the habitat.*
- iii) Habitats providing a supporting function to the annex habitat.*
- iv) Habitats of biodiversity value beyond the Natura designation(s).*
- v) Nature and extent of existing impacts on the natural functioning of the habitats including hard edges and sand.*
- vi) Each area of semi natural vegetation within and adjacent to the SAC which it is proposed to remove including the area adjacent to the proposed slipway and the area to be removed for construction of Car Park B.*
- vii) Each supporting document including the NIS and EIAR screening report shall be amended to take account of any revised and/or extended description of the receiving environment.*

2.1

Response to Item 1

In response to Item No.1 (i) – (vii) itemised above, the **Ecological Impact Assessment (EcIA)** has been updated. The Updated EcIA provides a more comprehensive overview of the baseline receiving environment including terrestrial, benthic/lacustrine and fringe habitats. Additional surveys were undertaken in May 2025 in response to the request for further information, including aquatic drone surveys along transects adjacent to the subject site. **Section 5** of the updated EcIA contains further detail in relation to the habitats present on the subject site and the wider surrounding area. This includes updated mapping to clearly demonstrate the application site in relation to the SAC and Annex I habitat, extracts of these maps are shown in **Figure 1 and 2** below. Please refer to the Updated EcIA for full details.

The **Natura Impact Statement** and **Environmental Impact Assessment Screening Report** have each been updated to account for the updated mapping and are submitted as part of the response to Further Information.



Figure 1: Extract of Figure 5-1 from the Updated EcIA showing application boundary and relevant habitats



Figure 2: Extract of Figure 5-4 of the Updated EcIA showing application boundary and the SAC

3.

FURTHER INFORMATION ITEM 2

Nature and Extent of Proposed Development

As the development is located partially within a European Site, and areas of high biodiversity value, Galway County Council is requested to submit a schedule of works which shall include materials and methods, to accurately describe the extent of proposed disturbance/loss of vegetation and or substrate to the lakebed supported by drawings. Reporting of proposed disturbance/loss should be described relative to the abundance of the habitat in the wider receiving environment. Galway County Council is requested to submit the following:

- i) A schedule of trees to be felled, and of those to be retained.*
- ii) Mitigation measures including but not limited to root protection zones for all lakeshore trees.*
- iii) Detailed materials and method for construction of the proposed slipway including any proposal to achieve increased depth of water adjacent for its operation or otherwise.*
- iv) Detailed description of vegetation, including trees to be removed for the creation of proposed car parking area B.*
- v) A summary Landscape impact assessment of the development from vantage points including from Corry's field protected view (CDP ref 40). The summary assessment will include consideration and recommendations as appropriate relating to lighting and car parking.*

3.1

Response to Item 2

3.1.1

Item 2(i)

A schedule of trees to be felled, and of those to be retained.

An **Arboricultural Report** has been prepared by Veon Forestry and is submitted as part of the FI response. A total of 62 no. individual trees and 8 no. groups were identified during the survey that took place in May 2025. It is concluded in the Report that a total of 50 no. trees within the redline boundary¹ of the proposed development will need to be removed to facilitate the development, most of which are low-quality (Category C), semi-mature trees and are therefore more easily replaced through replacement planting. 10 no. of these trees and 2 no. of these groups should be removed due to their poor condition, regardless of the proposed development. The full schedule of trees to be felled and retained is contained within the submitted **Arboricultural Report**.

3.1.2

Item 2(ii)

Mitigation measures including but not limited to root protection zones for all lakeshore trees.

The Arboricultural Method Statement contained within the **Arboricultural Report** outlines specific procedures and specialised techniques to mitigate impacts on retained trees during the proposed development's construction phases. It details tree protective fencing, establishing Construction Exclusion Zones (CEZs), employing practical protection measures like air-spading or hand-digging near Root Protection Areas (RPAs) to avoid root severance, and using ground protection to minimise compaction and contamination. All retained trees will be protected with Tree Protective Fencing for the duration of development.

¹ Please note that the Arboricultural Report also surveys 5 no. trees outside the redline boundary.

3.1.3 Item 2(iii)

Detailed materials and method for construction of the proposed slipway including any proposal to achieve increased depth of water adjacent for its operation or otherwise.

The **Updated Construction and Environmental Management Plan** contains further details on the construction methodology for each element of the proposed development. The following details relate to the proposed slipway as requested in Item(iii):

- Works will be carried out in the dry to avoid siltation of the Lough Rea and downstream watercourses.
- The work area will be temporarily dammed (coffer dam) with sandbags and will completely surround the work area for the kayak ramp.
- A submersible pump will be used to pump water out of the works area, creating a dry working area, and will be pumped to a discharge point, a minimum of 30m from any waterbody and within the main construction site. It will pass through a silt bag before discharge to ground.
- Prior to pumping, electrofishing will be carried out within the works area under licence from the NPWS by a qualified ecologist to remove any fish and move them into Lough Rea.
- Once a dry working area has been established and approved by the onsite ecological clerk of works (EcOW), the existing broken slip will be removed from the work area if required. This will be undertaken using power tools such as jack hammers and drills. Hand tools may also be used if required. No machinery will enter the works area.
- The new/upgraded slip will require some wet works as part of its installation. All wet work will be allowed to fully cure before the working area is re-wetted. All wet pouring will be supervised by the EcOW.
- Once works within the work area are complete, the sandbags will be removed to allow water from the lake back into the area.
- All works within the working area will be undertaken in line with the IFI, 2016: Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters and under supervision of an EcOW.

3.1.4 Item 2(iv)

Detailed description of vegetation, including trees to be removed for the creation of proposed car parking area B.

The majority of works to be undertaken are located in highly modified and managed habitats such as buildings and artificial surfaces, amenity grassland, non-native semi-mature treelines, and scattered trees and parkland. This includes both carparks A and B, as well as the amenity areas in the western section of the site. Please refer to **Section 5.1.1 of the Updated EcIA** which includes a detailed description and assessment of the habitats present on the subject site and surrounding area. This response has been informed by a site-specific **Arboricultural Report** which is enclosed as part of the FI response.

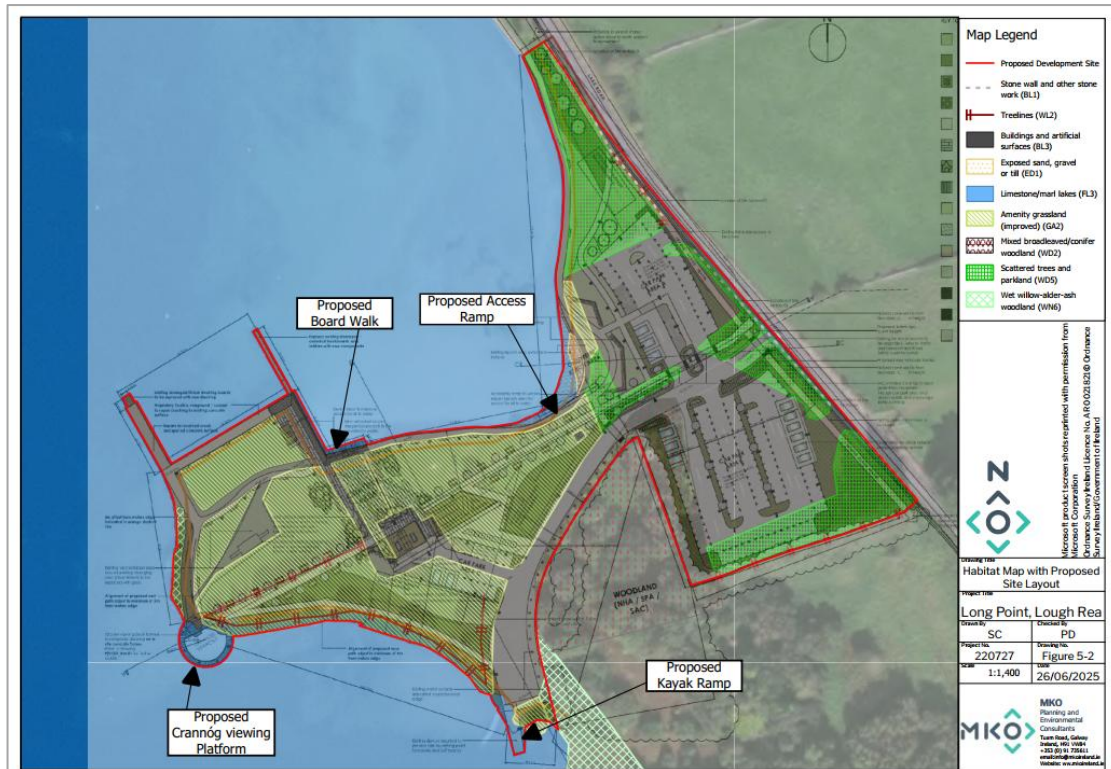


Figure 3: Extract of Figure 5-3 of the Updated EcIA showing the Scattered Trees and Parkland in Car Park Area B

3.1.5

Item 2(v)

A summary Landscape impact assessment of the development from vantage points including from Corry's field protected view (CDP ref 40). The summary assessment will include consideration and recommendations as appropriate relating to lighting and car parking.

In response to Item 2(v), MKO have prepared a **Landscape and Visual Impact Assessment (LVIA)** which is included as part of the Further Information response. The LVIA assesses the proposed development in the context of the receiving environment using a comparative visual technique, whereby accurate verified views, incorporating the proposed development are compared to the existing corresponding baseline photograph. This enables an assessment of the potential impacts of the proposed development on the receiving environment. The LVIA provides an assessment of the specifically requested viewpoint, Corry's Field Walk protected view (CDP ref.40) as well as two additional viewpoints, using methodology following best-practice guidance for LVIA.

The protected view V.40 at Corry's Field Walk as designated in the *Galway County Development Plan 2022-2028* is situated in a location without direct visibility of the proposed development. The direction of the protected view as defined in the local policy (looking east towards Loughrea Town) is not affected by the proposed development since it looks away from the site (at the south of the lake). The visual effects on the area of Corry's Field Walk are Low with a negligible visual change primarily owing to the distance of Corry's Field from the proposed development site (1.8km) and the nature of the proposed development comprising structures of low height, which are visible only to a small degree at the given distance. The landscape effects are found to be Low on account of the overall landscape character of the site will be improved in terms of its function as a recreational amenity area, which includes improved landscape and visual features.

Please refer to the submitted **Landscape and Visual Impact Assessment** for a detailed discussion.

4.

FURTHER INFORMATION ITEM 3

Habitat Management Plan

Galway County Council shall provide further information to justify the decision not to proceed with a Habitat Management Plan for the area as recommended by National Parks & Wildlife Service in the pre-planning consultation correspondence 15 March 2023. Consideration should be given to the carrying out and the submission of a Habitat Management Plan as part of the response to further information request.

4.1

Response to Item 3

A Habitat Management Plan (HMP) has been prepared by MKO and is submitted with the Further Information response. The HMP details enhancement measures to be implemented within the proposed development site to promote higher biodiversity within the overall site. It aims to maximise benefit for local biodiversity, as well as protecting European Sites from impacts arising from existing threats. The overarching objectives of the HMP are as follows:

- To establish high biodiversity habitats within the site and to enhance existing habitats where they are currently in-situ.
- To promote biodiverse grasslands and woodland within areas of the site, enhancing connectivity to the surrounding environment.
- Reduce potential threats on the adjacent protected sites such as Lough Rea SAC, SPA, and pNHA.
- To provide additional foraging habitat and resting/breeding sites for protected fauna including bats, badger and birds.
- Management of habitats to enhance them for pollinator species (e.g. species diverse grassland)

Please refer to the submitted **Biodiversity and Habitat Management Plan** for further details.

5.

FURTHER INFORMATION ITEM 4

Archaeology

The report of the Development Applications Unit (DAU) of the Department of Housing, Local government and Heritage sets out a prohibition on commencement of any works prior to submission and review of the Under Water Archaeological Impact Assessment (UAIA).

The DAU report also highlights the potential for design amendments to the proposal on foot of the findings of archaeological assessments.

Galway County Council shall undertake a programme of pre-development assessment in consultation with the National Monuments Service to facilitate the embedding or elimination of any further mitigation on the detailed design of the project ensuring complete assessments by the competent authorities of a finalised design and to submit the findings of same in response to this request.

5.1

Response to Item 4

Mizen Archaeology have prepared an Underwater Archaeological Impact Assessment to examine the potential impact of the proposed development on Lough Rea. Surveys were completed in June 2025 and included a systematic wade and metal detection inspection of the lakebed. A small portion of the lakebed around the outer limits of the pier were subject to a dive survey.

The results of the underwater survey, when considered alongside the extensive historical and archaeological record of Loughrea, reaffirm the cultural significance of the lake as a long-term locus of human activity from the Neolithic period through the medieval era and into modern times. Although the area surveyed lies outside the known crannog clusters and no archaeological features or artefacts were identified during the survey, the lakebed sediment retains considerable potential for the preservation of buried archaeological material.

Disturbance to the lakebed will be minimal and limited to localised works associated with the repair of the existing pier and slipway, the construction of a circular viewing deck to the south of the existing pier, and modifications to the existing beach area. Given that such disturbance may negatively impact on previously unrecorded buried archaeological remains, it is recommended that all lakebed disturbance be subject to licensed archaeological monitoring by a suitably qualified underwater archaeologist. The terrestrial elements of the proposed development should also be subject to archaeological monitoring, in accordance with the recommendations of the Development Applications Unit.

The proposed development is expected to result in only imperceptible to slight residual impacts on the archaeological heritage of the site. Any archaeological features or materials of significance will be preserved either in situ or by record. All residual effects will be appropriately offset through detailed archaeological recording to ensure the preservation of disturbed features and materials by record.

6.

FURTHER INFORMATION ITEM 5

Construction and Environmental Management Plan (CEMP)

Galway County Council shall provide site and project specific information within a revised CEMP which it is considered is necessary to inform an assessment. Revisions shall include the following:

- i) The nature and location of the proposed pre-cast elements for culverts and concrete works. Statements such as "Where possible, pre-cast elements for concrete works will be used." Should be clarified/refined/removed from the CEMP.*
- ii) Further detail in the form of a specification and construction methodology for each structure to facilitate assessment of "the existing pier surfaces and slipway will be repaired according to the engineers specifications."*
- iii) A drawing of the position of the location proposed silt fence between the works and the lake as set out in the CEMP should be submitted.*
- iv) Further detail and drawing(s) demonstrating suitable and unsuitable areas for the proposed perimeter construction phase swales around the construction areas.*
- v) The phasing of lake shore works, steps, ramps and beach shall be included in the proposed programme of works at section 6 of the CEMP.*

A revised table 5.1 of the CEMP shall include the following amendments/clarification of project specific measures:

i) Measure 1

The requirement for oversight of any amendments to the CEMP proposed post consent by an appropriate party should be referenced in Measure 1, such as National Parks and Wildlife Service (NPWS), Inland Fisheries Ireland (IFI), National Monuments Service (NMS) etc.

ii) Measure 2

Proposed location of silt fencing to be indicated on a submitted drawing should be referenced in measure 2.

The requirement for ecological supervision of works to the lake bed including enabling works (coffer dams etc.) should be strengthened and extended to include works to lake fringe.

The use of perimeter swales as mitigation needs to be described in both detail and the consideration of locations acceptable or otherwise. Designation of an exclusion zone from lake edge may be appropriate.

iii) Measure 4

This measure shall be reconsidered and drafted regarding the response to this further information request.

iv) Measure 5

The necessity for and details of a proposed silt curtain associated with the coffer dam should be set out in this measure.

The nature/meaning and application of precast elements is required.

The location of the proposed pre-cast culverts shall be identified within the proposal.

In the context of its use as a proposed mitigation measure, greater detail is required of foundations/formation layer for excavation/grading to install precast elements. The proposed nature of the pre-cast elements and a construction methodology and locations are required in order to undertake an assessment of potential impacts thereof.

v) *Measure 7*

Reference to pre-cast should be clarified as above, 'where possible' needs refinement and/or a statement of parameters for deciding where it could be possible.

Contradiction to be removed, no washing vs only washing of chute.

6.1

Response to Item 5

MKO have updated the **Construction and Environmental Management Plan (CEMP)** in response to Item No. 5 as outlined above. Further details in relation to the construction methodology have been provided with more information for each element of the proposed development including the proposed access ramp, proposed crannog circular viewing deck and proposed slipway. Please refer to the Updated CEMP for details in response to Item No. 6 (i) – (v).

Table 5-1 Mitigation measures for the Pre-commencement and Construction Phases of the CEMP has also been updated to amend and clarify the required measures as outlined in the FI request. Please refer to Page 42 of the Updated CEMP for the updated Table 5-1.

7.

FURTHER INFORMATION ITEM 6

Drainage and Flooding

Galway County Council shall provide further information to describe how flood protection of the foul holding tank and pumping station as recommended in the conclusion of the submitted flood risk assessment report has been incorporated into the proposal.

Further information is required in the form of clear drawings/sections demonstrating proposed site levels with reference to the proposed chamber levels of bypass separators and silt traps. This shall demonstrate how these structures are incorporated into the landscaping plan.

7.1

Response to Item 6

In response to Item No. 6, Shane Hanniffy and Associates Consulting Engineers, in consultation with Hydro Environmental Limited (project hydrologist), have revised the civil engineering drawings to more effectively demonstrate the proposed levels of all foul sewers, storm sewers, bypass separators, Stormbreaker Soakaways and foul sewer pumping station. It is proposed to raise the existing electrical kiosk to 81.40m O.D. (Flood Risk Assessment design height) as shown and to fully seal the existing foul pump chamber against ingress by floodwaters. Therefore, it is considered that the foul water pumping station can effectively store and pump to the wastewater network negating the possibility of contamination during flood events.

Please refer to the revised **Engineering Drawings** and **Engineering Cover Letter** prepared by Shane Hanniffy and Associates Consulting Engineers for further details.

8.

FURTHER INFORMATION ITEM 7

Schedule of proposed mitigation measures

Galway County Council is requested to submit a stand-alone table setting out all mitigation measures proposed across each of the various reports including ELAR Screening report, NIS, EcIA, CEMP, Landscaping Softworks plan, Flood Impact Assessment, Traffic and Transport assessment, Site lighting, and Archaeology assessments, for the purpose of clarity in the assessment and any consent arising.

8.1

Response to Item 7

All proposed mitigation measures set out in the various impact assessment reports have been incorporated into tabular format and included as **Table 5-1 Mitigation measures for the Pre-commencement and Construction Phases** in **Section 5** of the **Updated Construction and Environmental Management Plan** submitted as part of this Further Information response. This table sets out all of the mitigation measures in one place and provides an easy to audit list that be reviewed by the Planning Authority and reported on during the future phases of the project.

9.

RESPONSE TO SUBMISSIONS RECEIVED

It is considered important that Galway County Council take this opportunity to respond to the submissions received during the statutory consultation process. The below table provides a summary of the 3 no. submissions received and a response to the matters raised is provided thereafter.

Table 1: Summary of Submissions from Statutory Consultation Period

Matter Raised by	Summary of Matters Raised
1) Francis Fahy	<ul style="list-style-type: none"> - Notes that he is not opposed to the construction of a slipway, but that the proposed development should include a slip way that is multi-purpose in nature. - Provides details of summary design of slipway from UK Inland Waterways Association.
2) Gerard McInerney	<ul style="list-style-type: none"> - Largely welcomes the proposal but highlights number of issues. - Existing shelter should not be removed as it does not require maintenance or attendance and provides continual shelter. - Car Park Area C should be curtailed as a green area for children to play. - Children's beach area should be retained as is.
3) Development Applications Unit (DAU)	<ul style="list-style-type: none"> - Given the scale and location of the subject site, the submission recommends a number of standard archaeological conditions, including Archaeological Monitoring, is attached to any grant of permission. - Considering the potential impacts on underwater cultural heritage, the DAU submission recommends a pre-development underwater archaeological assessment is undertaken. Any mitigation should be incorporated into the design.

Response to Matters Raised

- 1) It is not proposed that the design of the new slipway will change as a result of this Further Information request. It is respectfully submitted that the proposed remedial works to the pier and the reinstatement of the slipway has been carefully considered and designed. The primary purpose of reinstating the slipway is to provide a separate access to the water for a variety of users, particularly those associated with water-based activities and sports such as kayakers, paddle board users, anglers and sailors. This will help to reduce any potential conflict between more vulnerable users of the area including children and swimmers, making the area safer and more accessible for a wide range of different people and uses.
- 2) The proposed design of the public realm enhancement works emerged from an iterative design process that had public consultation as a primary focus. It is well recognised that the current facilities are inadequate and do not conform to best practice guidance in relation to accessibility and universal design. There are also issues with vandalism and anti-social behaviour at the existing changing shelter, therefore, it is considered that there is a requirement to upgrade the changing facilities.

Extensive public consultation was carried out in relation to the project including a drop-in event on the 25th of January 2023. Feedback from the community was incorporated into the masterplan and a second public event was held in April 2023 to gain further feedback on the draft masterplan. An online survey was launched at this second event and received a total of 439 no. responses. Key issues among the community included concerns around vandalism and anti-social behaviour, the need for improved car parking arrangements and a greater focus on accessibility and creating an area that can be used by a wider variety of users.

The proposed design emerged from the community's feedback and there is an emphasis on accessibility and universal design. The proposed upgrades to the beach area include age-friendly seating and easier access to the water. It creates a place that encourages social interaction and enables the surveillance of children and young people. The proposed new changing facility is located in a more suitable area with closer proximity to the car parking area. This also enables greater passive surveillance of the changing area with the aim of reducing any potential for vandalism and anti-social behaviour.

- 3) The submission from the Development Applications Unit has been addressed through Item No. 4 Archaeology of the Further Information request. As stated in Section 5.1 above, Mizen Archaeology carried out two surveys of the subject and prepared an Archaeological Assessment Report outlining the relevant methodology and findings. It is respectfully suggested that the matters raised by the DAU have therefore been appropriately addressed.

10.

CONCLUSION

This Response to Further Information Report has been prepared to support the proposed public realm improvements at Long Point, Loughrea, Co. Galway. It is respectfully submitted that Galway County Council, as the applicant, have fully addressed the matters raised by An Coimisiún Pleanála and have appropriately responded to the matters raised by third parties and prescribed bodies. It is noted that neither of the two third party submissions are opposed to the principle of the proposed development and instead are predominantly raising design related matters. It is considered that the matters raised have been addressed in this Further Information response.

The proposed development, emerging from extensive public consultation and community feedback, presents a transformative enhancement of Long Point. In conclusion, it is respectfully submitted that the proposed development complies with the proper planning and sustainable development of the area, creates universal accessibility and promotes positive placemaking.

