

**Strategic Housing Development,
Moneyduff and Oranhill, Oranmore,
Co. Galway**

**Planning Report and
Statement of Consistency
(Stage 3 SHD)**



Planning & Environmental Consultants

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1 INTRODUCTION

1.1 Preamble

This Planning Report and Statement of Consistency, which has been prepared by McCarthy Keville O’Sullivan (MKO) on behalf of Arlum Ltd in support of an application to An Bord Pleanála (ABP) under the *Planning and Development Act 2000* (as amended by the *Residential Tenancies Act 2016*) for a strategic housing scheme located in the townlands of Moneyduff and Oranhill, Oranmore, Co. Galway. The application is made under the Strategic Housing Provisions of the *Planning and Development (Housing) and Residential Tenancies Act, 2016*.

This Planning Report and Statement of Consistency (hereafter referred to as Report) has been prepared to specifically address the requirements of the *Planning and Development (Strategic Housing Development) Regulations 2017* and the associated guidelines issued by An Bord Pleanála. The proposed residential development has been prepared in accordance with the national planning policy, pertinent Section 28 Ministerial Guidelines, the requirements of *Galway County Development Plan 2015-2021* and the *Oranmore Local Area Plan 2012-2022*. This Statement of Consistency also includes details in respect of the proposed development in relation to the site location and context, the development description and the relevant planning history and compliance with the development plan policies.

This report provides a comprehensive assessment of the proposed development’s consistency with the relevant planning policy documents at national, regional and local levels. An appendix is also included which provides an individual breakdown of each of the relevant planning policies and guidance. The following policy documents are considered in both the main body of the report and the appendix:

- Project Ireland 2040 National Planning Framework;
- Action Plan for Housing and Homeless, Rebuilding Ireland, July 2016;
- Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)
- Sustainable Urban Housing – Design Standards for New Apartments, Guidelines for Planning Authorities (2018);
- Sustainable Residential Development in Urban Areas Guidelines 2009 and the associated Urban Design Manual;
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009);
- Guidelines for Planning Authorities on The Planning System and Flood Risk Management (November 2009)
- Childcare Facilities Guidelines for Planning Authorities (2001)
- Smarter Travel – A New Transport Policy for Ireland (2009-2020);
- Design Manual for Urban Roads and Streets (2013);
- Regional Planning Guidelines for the West Region 2010-2022;
- Draft Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly;
- Galway County Development Plan 2015-2021; and
- Oranmore Local Area Plan 2012-2022.

1.2 Background to the Proposed Scheme

Following consideration of the refusal of the previous SHD application on this site (PL Ref. ABP-301952), the current application presents additional information with the aim of addressing the two refusal reasons stated in the previous application.

Firstly, with respect to refusal reason one in the previous application, the current Article 6(3) Screening report screens in the potential for the proposed development to result in significant effects on both Cregganna Marsh Special Protection Area (SPA) and Rahasane Turlough SPA. These sites were Screened out in the previous application. This follows an extremely precautionary principle. In order to provide additional evidence that the site and the surrounding area do not provide significant habitat for Greenland white-fronted goose (or any other wildfowl species), monthly bird surveys have been undertaken from October 2018 to March 2019 (a full winter season). The results have been included in the **Natura Impact Statement** (NIS) that is now being submitted to An Bord Pleanála. There have been no records of the Special Conservation Interests (SCI) species from either Cregganna Marsh SPA or Rahasane Turlough SPA (Greenland white fronted goose) either on the site or in the surrounding area during the surveys undertaken so far. Neither has there been any usage of the site or adjacent fen area by any other wildfowl species. The purpose of the monthly winter bird surveys to demonstrate beyond reasonable scientific doubt, that the site of the proposed development and areas immediately surrounding it do not provide suitable habitat and are not used by Greenland white-fronted goose. The surveys also demonstrate that the site and surrounding fen is not significantly used by any of the bird species that are among the qualifying interests of the Inner Galway Bay SPA either and that no adverse effects on any of these designated sites are predicted.

In respect of refusal reason 2 of the previous application (PL Ref. ABP-301952), additional monthly bird surveys provide the information necessary to conclusively demonstrate that the proposed development itself will not result in effects on the SCI species of the Inner Galway Bay SPA, Cregganna Marsh SPA or the Rahasane Turlough SPA. As described above, these surveys have been undertaken throughout the entire winter period (October 2018- March 2019), with the NIS being updated accordingly. The revised NIS also includes an assessment of the potential effects of the proposed development on the nearby European Designated Sites as a result of disturbance, recreational pressures and population increase. Whilst the potential effects on the Fen habitats were assessed in the previous application, a further, specific and dedicated assessment of the adjacent alkaline fen habitat has been undertaken and is included as an appendix to the NIS and Environmental Impact Assessment Report (EIAR). Effects on this habitat within the SAC are fully considered in the current NIS.

In addition to the above, the following additional survey work and assessments have been undertaken within the revised Natura Impact Statement and Environmental Impact Assessment documentation:

- Dedicated otter surveys have been undertaken on the 22nd of February and 9th of April 2019 to supplement surveys undertaken in 2018. No signs of otter were recorded during any surveys of the site.
- A bat activity survey was undertaken on the 8th and 9th of April 2019. Only 11 bat passes were recorded during the survey, associated with a small number of individual bats. No bat roosting opportunities were identified within or adjacent to the proposed development site. No significant effects are anticipated on bat species as a result of the proposal.

- Monthly bird surveys were undertaken between October 2018 and March 2019. Surveys were carried out on the development site and the surrounding habitats including the adjacent fen and from suitable vantage points surrounding Cregganna Marsh SPA. The bird populations occurring within the SPAs in the area are separated from the proposed development by existing houses, roads and other infrastructure. The bird surveys undertaken did not record any significant usage of the site or the areas surrounding it. In addition, a comprehensive review of the disturbance distances for each of the SCI species has been undertaken. This shows that the SCI species occur outside the known disturbance distance of the site.
- Further consideration was given to the potential for increased anthropogenic disturbance, as a result of an increase in population in the area, to species for which nearby Special Areas of Conservation (SACs) and SPAs have been designated. The development does not in any way provide any access to any SAC or SPA that are outside the site boundary and does not encourage such access. No impact on any faunal populations of more than local significance is anticipated. It is designed in accordance with the Oranmore Local Area Plan 2012-2022 (LAP), which has itself been the subject of Appropriate Assessment. Furthermore, the proposed development ensures the provision of a network of recreational greenspaces located within the development site, including a looped walk, playground, wildflower meadow, communal garden and public parkland open space. Recreational and amenity space within the development site is above the minimum 15% set out in the Oranmore LAP. This is in accordance with good planning, which ensures that the eventual residents of the estate have their recreational requirements considered in the design of the scheme and are not entirely dependent on recreational facilities outside the site. This is in accordance with the extant Oranmore LAP.
- A detailed botanical assessment of the fen habitat was conducted on the 13/12/2018 and 09/04/2019. This was undertaken to assess the potential for impact as a result of any alteration to local hydrology.
- The hydrology chapter (Chapter 7) has been updated with additional assessments to fully assess the potential for impact on groundwater and surface water associated with the proposal. This concludes that there is no potential for the proposed development to result in effects on the downgradient fen to the north and west or on the wetlands that are located in the wider area to the east of the N18 or to the south in Cregganna Marsh.
- Reports have been reviewed and updated to give full consideration of all of the Attributes and Targets for each of the QIs/SCIs habitats/species considered in the assessment of potential impact.
- The assessment provides a consideration of the potential impacts using project design, consideration of Local Area Plan/County Development Plan and interactions with other projects.
- A **Habitat Management Plan**, including both the establishment and maintenance of the grasslands as part of the proposed development, is provided as **Appendix 5-4 of the EIAR**. There is a commitment to the implementation of the measures that are set out in the habitat management plan including both the establishment and maintenance of seminatural grasslands into the future through appropriate management and monitoring regimes. The grassland management plan and other measures for biodiversity enhancement have been incorporated into the landscaping plan (see **Drawing 18223/3/100 Landscape Masterplan**).

The assessments and associated ecological reporting have been updated to specifically address the refusal points raised in the previous application on the site (Pl. Ref. ABP-301952-18).

1.3 Structure of the Report

Following this Introduction section, the Planning Report and Statement of Consistency is set out as follows:

- | | |
|-----------|---|
| Section 2 | Provides a description of the site's context within the surrounding area. |
| Section 3 | Itemises the relevant planning history of the application site and other relevant sites in the surrounding area. |
| Section 4 | Details of pre-application consultation discussions which have informed and shaped the proposed development. |
| Section 5 | Provides a description of the proposed scheme including the intended Part V proposals. |
| Section 6 | Provides an assessment of potential environmental impacts associated with development. |
| Section 7 | Summarises the Appropriate Assessment undertaken for the subject lands. |
| Section 8 | Provides an assessment of the key planning matters relating to the proposed development in the context of the relevant national, regional and local planning policy framework. This section also includes a Statement of Consistency in the form of a matrix of planning policies and guidance. |
| Section 9 | Draws out and summarises the key features of the proposed development, in addition to providing a concluding statement on the proposed scheme's contribution to the proper planning and development of the area. |

2 SITE LOCATION AND CONTEXT

2.1 Site Location

The proposed site is located in the townlands of Moneyduff and Oranhill, approximately 590m south of the centre of Oranmore, Co. Galway. Oranmore is positioned along the inner shoreline of Galway Bay, c.7km east of Galway City. The area is characterised by existing and emerging residential development. The subject lands are located to the south of a well-established residential area of predominantly single storey bungalows (Beech Grove/Park). A modern housing development comprising detached and semi-detached residential units is located to the south of the subject lands (including Orancourt, Oranhill Road/Drive). A modern apartment block containing three floors is located further to the south west of the subject lands. An Bord Pleanála have permitted development for 61 no. residential units on lands located immediately south of the proposed site which have not been constructed to date (see An Bord Pleanála reference PL 61.246315 for further details). The application site has direct frontage onto the Orancourt Road. The N67 runs in a north south direction to the east of the application site. The permitted North-South Oranmore Distributor Road forms the eastern site boundary.

The proposed development is governed by the policies and provisions contained in the *Galway County Development Plan 2015-2021* (GCDP) and *Oranmore Local Area Plan 2012-2022* (LAP). Oranmore is identified as a *'thriving satellite settlement'* and a key town with a population >1500. It is noted that the settlement of Oranmore is featured in both Tier 1 (Galway Metropolitan Area) and Tier 4 (Key Town), with an explanation provided on Page 40 of the GCDP that the Galway Metropolitan Area only encompasses part of the LAP area of Oranmore. The proposed site is located in the Electoral District of Clarinbridge, therefore it is located outside the Galway Metropolitan Area (GMA), as illustrated on **Figure 1** below. The application site is located within the Galway Transport Planning Study (GTPS) area.

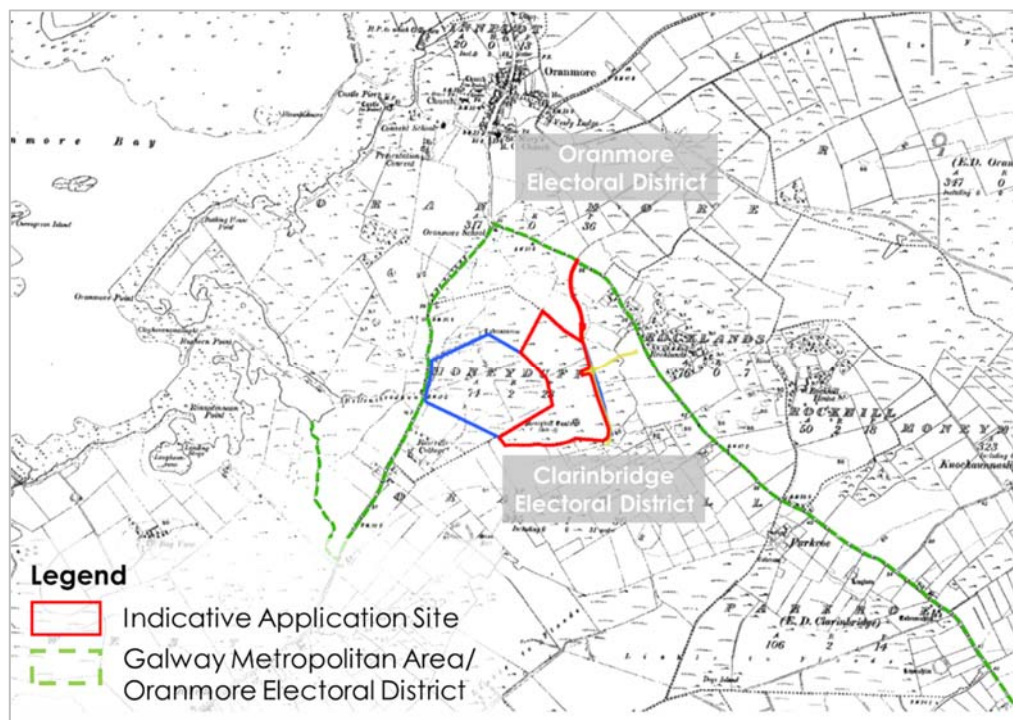


Figure 1: Site Location in the Context of the GCDP Settlement Strategy

2.2 Site Description

The proposed site has an area of circa 8.67 ha and is currently uncultivated land with evidence of rough grazing of horses. The proposed site comprises several fields containing stone walls and hedgerows. The site boundaries are composed of a mixture of concrete block wall, dry stone walls and hedging. Overhead lines run along the south-western boundary of the site.

The proposed site has an elevation ranging between approximately 3.4 and 12.8m OD (Ordnance Datum). The overall local topography generally slopes from east to west with deposited fill located in mounds around the site creating artificial high points. The dominant land use on the bordering land is residential housing to the north, an environmental reserve to the west and an empty site and further residential uses to the south and greenfield site to the east (see **Figure 2**). The site and surrounding area is further documented in **Plates 1 to 4** below.

Lands to the east consist of a greenfield site which currently enjoy planning permission under PL07.237219 /GCC Planning Ref: 09/1925 as extended under Plan ref: 15/1334. The N67 runs in a north south direction further east.



Figure 2: Indicative Site Location
(Aerial Image: Bing Maps © 2018)



Plate 1: Existing Site Conditions



Plate 2: Existing Site Conditions



Plate 3: View of Landholding from Oranhill Road



Plate 4: View of N67 to east of proposed site

2.3 Site Constraints

2.3.1 Cultural Heritage

One recorded monument (RMP No. GA095-084), the site of a castle, is located within the proposed development site. See **Figure 3**.

This castle is depicted and named 'Moneyduff Castle (Site of)' on the 1st edition OS six-inch map of 1840, the OS 25-inch map of the late 19th/early 20th century and the 1920 edition of the OS six-inch map. It was the seat of David Ballagh and Slighe Tybact in 1574 (Nolan, 1901).

It is situated on a rise near the South-East corner of the proposed development site. What remains of the castle is an overgrown (hazel, grass and moss) rectangular area, which measures c. 8m E/W, situated over 5m above the surrounding land.

An **Archaeological Impact Assessment** and **Pre-Development Testing Survey** of the proposed scheme has been completed by Richard Crumlish, B.A., M.I.A.I., Consultant Archaeologist, the results of which are enclosed in Chapter 11 and Appendix 11.1 respectively of the **Environmental Impact Assessment Report**. A **Conservation Management Plan** for the site of Moneyduff Castle, prepared by Anne Carey, Historic Buildings Consultant and Richard Crumlish, Consultant Archaeologist, is also enclosed in Appendix 11. 2 of the **Environmental Impact Assessment Report**.



Figure 3: Recorded National Monuments in the Context of the Proposed Site
(Source: Myplan.ie)

2.3.2 Designated Sites

The site is located immediately east of the Galway Bay Complex Special Area of Conservation (SAC) and Proposed National Heritage Area (pNHA) (site code 000268) and approximately 500 metres to the east of lands designated under the Inner Galway Bay Special Protection Area (SPA) (site code 04031). Cregganna Marsh SPA (site code 004142) and NHA is located approximately 300 metres south of the proposed application site (see **Figure 4**).

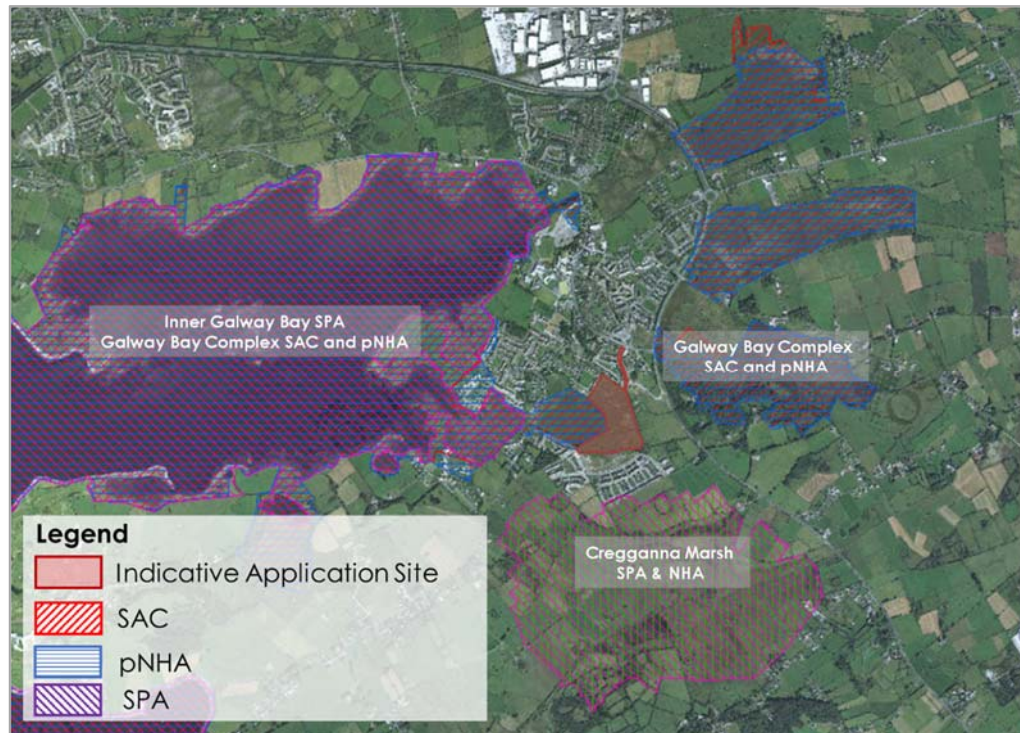


Figure 4: Designated Sites (Source: MyPlan.ie)

2.3.3 Hydrology and Geology

On a regional scale, the site is located within Hydrometric Area 29 of the Western River Basin District (WRBD). The site is located in the Galway Bay South East catchment and Carrowmoneash (Oranmore)_SC_010 sub-catchment under the Water Framework Directive (WFD). The Millpot Stream flows west from the land to the west of the proposed site, and continues west, discharging into Oranmore Bay ~295m downstream. The proposed development site does not contain any mapped watercourses.

According to GSI mapping¹, the site is dominated by shallow, well drained mineral soils (BminSW) and shallow, rocky, peaty mineral complexes (BminSRPT). The area to the west of the proposed site is dominated by peat and some minor areas of the proposed development site in the southwest also contain peat. The mapped subsoil type for the proposed site show the majority of the site is underlain by karstified bedrock outcrop/subcrop (KaRck) with some areas of raised peat in the southwest of the site.

The underlying bedrock geology for the entire site is mapped as Dinantian Pure Bedded Limestones (DPBL) and is classified by the GSI as a Regionally Important Aquifer – Karstified (conduit) (Rkc). There are no mapped faults running through the site and no

¹ Available on: www.gsi.ie

local mapped karst features within the site that may contribute to groundwater flooding.

Further information is available in Chapter 7 of the **Environmental Impact Assessment Report**.

2.3.4 Flooding

The OPW Preliminary Flood Risk Assessment Maps (PFRA) for the area (Map no. 210)² indicates that there are areas of the proposed site, on the western boundary, within the indicative 200-year coastal flood zone (i.e. Flood Zone A) and 1000-year coastal flood zone (i.e. Flood Zone B). Land to the west of the proposed site is located within the indicative Flood Zone A. The PFRA mapping reflects the close proximity of the site to Oranmore Bay and the fact that the topography of the land between Oranmore Bay and the proposed development site is relatively flat. No areas within the proposed site are located in the indicative 100-year fluvial or pluvial flood zones (Flood Zone A) or the 1000-year fluvial or pluvial flood zone (Flood Zone B).

Where complete, the Catchment Flood Risk Assessment and Management (CFRAM)³ OPW Flood Risk Assessment Maps are now the primary reference for flood risk planning in Ireland and supersede the PFRA maps. CFRAM mapping has been completed for the area of the proposed site. The CFRAM mapping shows that the proposed development site is outside the 10-year Tidal Flood Extent. Large sections of the land to the west of the proposed development site are located within the 10-year Tidal Flood Extent, but owing to higher land within the development site, the flood extent does not encompass this land to the east. Furthermore, no areas within the proposed development site are located in the 200-year flood level (Flood Zone A) or the 1000-year flood level (Flood Zone B). As such, the entire proposed development site is located in Flood Zone C.

Further information is available in Chapter 7 of the **Environmental Impact Assessment Report**.

² Available on: (www.cfram.ie/pfra/interactive-mapping/)

³ CFRAM is Catchment Flood Risk Assessment and Management. The national CFRAM programme commenced in Ireland in 2011, and is managed by the OPW. The CFRAM Programme is central to the medium to long-term strategy for the reduction and management of flood risk in Ireland.

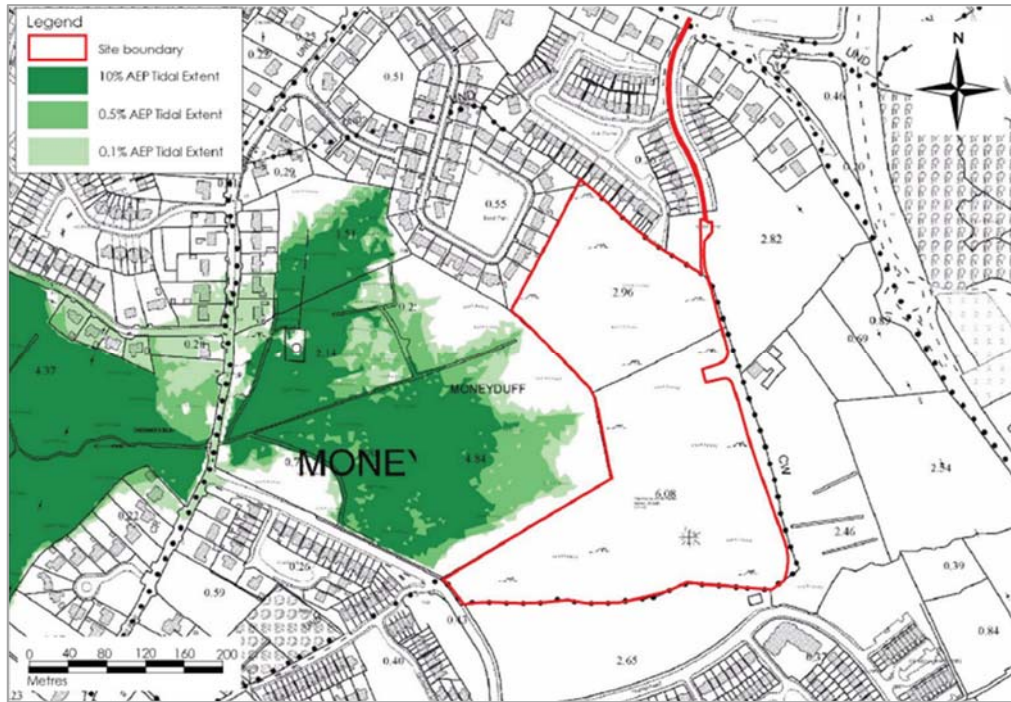


Figure 5: CFRAM Tidal Flood Zone Mapping (Flood Zones obtained from PFRA Maps no. 210). Map extracted from Hydro Environmental Services Flood Risk Assessment Report (pg. 14)

3 PLANNING HISTORY

3.1 Application Site

A review of the online planning register of Galway County Council indicates that there is a previous SHD application and a historical application on the proposed site, details of which are provided below:

- ABP-301952-18: Arlum Ltd applied for planning permission to develop a Strategic Housing Development scheme comprising 212 no. residential units, creche, new vehicular and pedestrian access at Moneyduff, Oranhill, Oranmore, Co. Galway. Permission was refused on the 3rd October 2018 based on ecological reasons.

The reasons for refusal are set out below:

1. 'Having regard to the information provided in the Screening Report dated 14th June 2018, the Board could not be satisfied that the exclusion from the Natura Impact Statement of the European Sites Cregganna Marsh Special Protection Area (SPA) (Site Code: 004142) and Rahasane Turlough SPA (Site Code: 004089), on the basis that the development is entirely outside the designated sites with no complete source-pathway-receptor chain, was appropriate given the possible use of the development site by the Greenland White-fronted Goose, which is listed as a species of Special Conservation Interest for both SPAs'.
 2. 'The Natura Impact Statement does not consider the potential for effects on Special Conservation Interest bird species of the Inner Galway Bay SPA (Site Code: 004031) and the Cregganna Marsh SPA (Site Code: 004142) including as a result of increasing disturbance and potential increases in recreational and amenity pressures or potential effects on qualifying interest alkaline fen habitats within the Galway Bay Complex Special Area of Conservation (Site Code: 000268). The Board therefore cannot be satisfied, beyond reasonable scientific doubt, that the proposed development, either individually or in combination with other plans and projects, would not adversely affect the integrity of these European sites, Galway Bay Complex Special Area of Conservation (Site Code: 000268), Inner Galway Bay SPA (Site Code: 004031), Cregganna Marsh SPA (004142) and Rahasane Turlough SPA (004089), in view of the sites' Conservation Objectives'.
- Historical Planning Reference 6429: No details available on the online planning file.
 - Other relevant planning history:
Planning Enforcement EN15/104: Unauthorised sign. No further details available on the online planning file.

3.2 Relevant applications in the vicinity of the application site

Notable previous planning applications in the vicinity are summarised below:

- Pl Ref 09/1925/ ABP Reference PL 07.237219: Permission sought for the construction of a residential/commercial development comprised as follows: 1. The completion of the North-South Oranmore distributor road, the route of which was agreed under planning reference 04/305 and for the link of same to the

existing roundabout constructed on the N18 for the purpose to serve the North-South distributor road. 2. The modification of part of the development scheme known as 'Coill Clocha' previously approved under pl. ref. 04/305. In particular sites numbered 22-27 in the 'Coill Clocha' development are to be replaced in the proposed residential development described hereunder. 3. The construction of 161 residential units consisting of two and three storey buildings containing detached and semi-detached houses, townhouses, apartments and duplex units and for all associated garages and bin stores to serve the development. 4. The provision of 2 commercial units to use as a convenience shop/hairstyling/butcher etc, and a unit for the use as community meeting rooms. 5. The construction of a 2 storey over semi-basement hotel, consisting of 44 en-suite bedrooms, reception areas, function room, restaurant, lounge bar, salon, offices to serve the hotel, staff areas, public toilets, kitchen, security office, M & E room and external storage shed. The semi-basement will contain car parking for 54 cars. 6. The construction of a 2 storey leisure centre to serve the hotel and residential development. This will contain a swimming pool, changing areas, reception, staff rooms, storage and a gymnasium. 7. Surface car parking to serve the hotel and leisure centre and a set down area for the hotel. 8. All ancillary site works, services, roads, footpaths, street lighting, hard and soft landscaping and level playing areas. 9. The provision of a landscaped park area to serve the proposed development and surrounding area. The park will contain walking routes, level playing area, picnic tables, children's playground and gazebo. 10. The connection of the development to the public sewer and for all ancillary plant associated with same. 11. The construction of an access road to lands to be transferred to Galway County Council. (gross floor space 25,930.03sqm)

Notification of Decision to Refuse Permission overturned by An Bord Pleanála. Application granted subject to 27 no. conditions.

- Pl Ref 15/1334: Extension of Duration sought to previous planning reference no. 09/1925. Permission granted on 21st December 2015 for a five-year period.
- Mixed Use Development Oranhill – Pl Ref 19/44: Edmonton Developments Limited applied to Galway County Council for the redevelopment of an existing infill and brownfield site to provide for a mixed-use development comprising of 22 no. residential units and 1 no. commercial unit, new pedestrian and vehicular access from the Oranhill road and all associated site development works and services. The application was submitted to Galway County Council on the 16th January 2019. Galway County Council requested further information on 8th March 2019. The site is located directly to the west of the proposed development.

4 PRE-PLANNING CONSULTATION

Minutes of the statutory consultations undertaken with the Galway County Council under Section 247 of the *Planning and Development Act 2000 (as amended)* are provided in **Appendix A**. A summary of the main issues of discussion and the design iterations implemented as a result of the feedback received from the Planning Authority are summarised below.

4.1 Meeting with Galway County Council Regarding Link Road - 25th January 2018

The principle of accessing the subject lands via the link road permitted under PL Ref 09/1925; ABP Reference PL 07.237219 which was later extended under PL Ref 15/1334 was discussed. **Figure 6** below shows the outline of the North-South Link Road located to the west of the subject lands.

Galway County Council confirmed that there is no planning reasons which would prevent Roykeel Ltd. (or the current applicant Arlum Ltd. acting on their behalf) completing the access road under Phase 1 of the existing planning permission. The applicant agreed to provide confirmation that Arlum Ltd. have an entitlement to develop the link road under PL Ref 15/1334 by way of a solicitor's letter (Correspondence from Kevin Murphy & Co. Solicitors in provided in **Appendix B**).

4.2 Section 247 Pre-Planning Discussions with Galway County Council - 2nd February 2018

A Section 247 Pre-Application Meeting was convened with GCC on the 2nd February 2018. A copy of the meeting note is provided in **Appendix A**. A copy of the site layout discussed at the meeting is provided below.



Figure 6: Site Layout discussed with Galway County Council - 2nd February 2018

Notable feedback from Galway County Council included:

Planning Authority

The Planning Authority welcomed the proposal and noted the high quality of the proposed built development, including the satisfactory mix of housing units. Given the scale of the development and the proximity to the SAC, the Planning Authority advised that a Natura Impact Statement be prepared.

Access

The Roads Department (Roads) noted that a Traffic Impact Assessment and Road Safety Audit has been completed for the link road permitted under Ref 09/1925; ABP Reference PL 07.237219 which was later extended under Pl Ref 15/1334. Roads were concerned with the direct access for the 10 no. dwelling units as this would not have been assessed under the in the 2009 planning application for the adjacent lands. Roads advised if the proposal includes direct access for the 10. individual dwelling units, then they would be required to assess this aspect of the link road again under the current application. Roads noted that DMURS does not promote direct access onto distributor roads. Roads confirmed that if the proposal does not include direct access to the permitted link road for individual houses, then a Traffic Impact Assessment is not required.

Roads also raised a concern that the location of the proposed Part V units may pose sightline issues. Roads advised that a Road Safety Audit will be required if the developer intends for the local authority to take the development in charge. The applicant confirmed that a management company will be established to manage the site rather than having it taken in charge.

Part V

The Housing Section was concerned about the distribution of Part V units and would like to see the proposed units dispersed with access to communal open space. Currently the Housing Authority's demand in Oranmore equates to 75% two-beds and 25% three beds.

Environmental

The Environment Section advised that if the site levels are going to be raised the applicant needs to apply for a permit for the fill material. Surface water management proposal will be required to be addressed. All stormwater generated on site from roadways and roofs will be required to be discharged via Oil/Petrol Interceptors.

The project engineer confirmed that a Pre-Connection Enquiry has been lodged with Irish Water.

Conclusion

The Planning Authority concluded the meeting by reiterating that Galway County Council welcomed the proposal which is in accordance with GCDP Core Strategy and complimented the architectural approach.

Key matters to revisit/address are:

- Direct access for individual houses to the permitted link road;
- Requirement for a Natura Impact Statement;
- Distribution of Part V units; and

- Compliance with DMURS.

Following the pre-planning meeting on 2nd February 2018, the Design Team made a number of revisions to the proposed design to address the Planning Authority's concerns.

Key design changes include:

- Removal of the original proposal to provide direct access for 10 no. residential units to the permitted north-south link road;
- The proposed Part V units were redistributed throughout the site;
- Enhanced links were provided to the green area surrounding the Castle ruins from the duplex units in the south-eastern portion of the site;
- The revisions to the site layout resulted in a loss of 5 no. residential units from 197 no. dwellings to 192 no. dwellings.

4.3 Tripartite Discussions with An Bord Pleanála, Galway County Council and the Prospective Applicant on 24th April 2018 in relation to ABP-301193-18

Under Section 5 of the *Planning and Development (Housing) and Residential Tenancies Act 2016*, An Bord Pleanála convened a tripartite meeting with the prospective applicant and Galway County Council on the 24th April 2018.

Key items discussed included:

1. The integration of the proposed development with the urban structure of Oranmore, in particular the provision of road access for the proposed housing in accordance with the applicable standards in DMURS, including access for pedestrians as well as vehicular traffic, and the provision of a permeable urban form which facilitate links to the town centre and neighbouring residential areas including the road at Coill Clocha to the north and a pedestrian link towards the Maree Road via Orancourt.
2. The rationale for the number and type of houses proposed, having regard to national policy on residential density in urban areas and the provision of a suitable mix of housing types to meet the needs of the community.
3. The layout of the proposed housing development having regard to the need to provide a high standard of urban design and residential amenity that respects the context of the site.
4. Impact on natural heritage and ecology.
5. Impact on cultural heritage and archaeology.
6. Proposals for compliance with Part V of the planning act and the phasing of development
7. Foul and surface water drainage, including connection the public sewerage, pumping on site, capacity at the WWTP; SUDS measures; water supply
8. Any other matters.

Following the previous pre-planning meeting on the 24th April 2018, the prospective applicant and design team made a number of revisions to the proposed design to address An Bord Pleanála's comments and submitted the formal planning application to An Bord Pleanála. The Board acknowledged that a valid application had been made on the 2nd July 2018 and allocated the application reference ABP-301952-18.

Post Meeting Note:

The planning application ABP-301952-18 was refused by An Bord Pleanála by Order dated 3rd October 2018 for 2 no. reasons relating to ecology. A summary of the refusal reasons is provided above in Section 3.1.

4.4 Section 247 Pre-Planning Discussions with Galway County Council – 18th October 2018

Following review of the decision to refuse planning permission for ABP-301952-18, the applicant and design team devised a strategy for addressing the 2 no. reasons for refusal.

A stage 1 SHD meeting was held with Galway County Council where the project ecologist outlined the methodology for addressing the reasons for refusal, a summary of which is provided below:

- Following consideration of the refusal of the previous SHD application on this site (Pl.Ref:ABP-301952), the current application features a number of changes and presents additional information with the aim of addressing the two refusal reasons stated in the previous application.
- Firstly, with respect to refusal reason one in the previous application, the current Article 6(3) Screening report screens in the potential for the proposed development to result in significant effects on both Cregganna Marsh SPA and Rahasane Turlough SPA. These sites were Screened out in the previous application. This follows an extremely precautionary principle. In order to provide additional evidence that the site and the surrounding area do not provide significant habitat for Greenland white fronted goose (or any other wildfowl species), monthly bird surveys are currently being undertaken from October 2018 to March 2019 (a full winter season). These surveys have been completed up to December 2018 and the results have been included in the NIS that is now being submitted to An Bord Pleanála. There have been no records of the SCI species from either Cregganna Marsh SPA or Rahasane Turlough SPA (Greenland white fronted goose) either on the site or in the surrounding area during the surveys undertaken so far. Neither has there been any usage of the site or adjacent fen area by any other wildfowl species. The purpose of the monthly winter bird surveys to demonstrate beyond reasonable scientific doubt, that the site of the proposed development and areas immediately surrounding it do not provide suitable habitat and are not used by Greenland White Fronted Goose. This will also demonstrate that the site and surrounding fen is not significantly used by any of the bird species that are among the qualifying interests of the Inner Galway Bay SPA either and that no adverse effects on any of these designated sites are predicted.

The results of the surveys will be used to inform the NIS, which has been updated accordingly in the current draft and will be further updated following completion of the surveys in March 2019.

- In respect of refusal reason 2, additional monthly bird surveys will provide the information necessary to conclusively demonstrate that the proposed development itself will not result in effects on the SCI species of the Inner Galway Bay SPA, Cregganna Marsh SPA or the Rahasane Turlough SPA. As described above, these surveys will be undertaken throughout the entire winter period and will be completed in March 2018, with the NIS will be updated accordingly. The revised draft NIS also includes an assessment of the potential effects of the proposed development on the nearby European Designated Sites as a result of disturbance,

recreational pressures and population increase. Whilst the potential effects on the Fen habitats were assessed in the previous application, a further, specific and dedicated assessment of the adjacent alkaline fen habitat has been undertaken and is included as an appendix to the NIS and EIAR. Effects on this habitat within the SAC are fully considered in the current draft NIS.

- The assessments and associated ecological reporting have been updated to specifically address the refusal points raised in the previous application on the site (Pl.Ref. ABP-301952-18).

4.5 Tripartite Discussions with An Bord Pleanála, Galway County Council and the Prospective Applicant on 8th February 2019 in relation to ABP-303294-18

Under Section 5 of the *Planning and Development (Housing) and Residential Tenancies Act 2016*, An Bord Pleanála convened a tripartite meeting with the prospective applicant and Galway County Council on the 8th February 2019.

Key items discussed included:

- Natural Heritage and Ecology, NIS and EIAR;
- Archaeological and Cultural Heritage; and
- Pedestrian permeability and DMURS.

A record of the meeting is included in **Appendix A**.

4.6 Discussions with the National Parks and Wildlife Services

The Development Applications Unit (DAU) of the Department of Culture, Heritage & The Gaeltacht was consulted on the pre-application consultation documents. A letter in response was received on the 29th of January 2019. This initial correspondence was followed up with a meeting with the National Parks and Wildlife Service. A pre-submission consultation meeting was held with the NPWS on 27th of February 2019 to address the issues raised by the DUA. The consultation response received from the DAU and the minutes of the meeting with the NPWS are provided as **Appendix A**. All comments raised by the DAU and NPWS have been considered in the preparation of this application.

5 PROPOSED DEVELOPMENT

5.1 General Description

Planning permission is sought by Arlum Ltd. for development on a site which extends to 8.7 ha in the townlands of Moneyduff and Oranhill, Oranmore, Co. Galway.

The proposed development will consist of the following:

- 1) Construction of 212 no. residential units comprising:
 - 34 no. House Type A (four-bed semi-detached unit)
 - 54 no. House Type B (three-bed semi-detached unit)
 - 16 no. House Type C (four-bed detached)
 - 16 no. House Type D (three-bed terraced unit)
 - 24 no. House Type E four-bed semi-detached unit)
 - 50 no. House Type G (25 no. two-bed ground floor duplexes and 25 no. two-bed first/second floor duplexes)
 - 6 no. House Type H (two-bed duplex apartments)
 - 12 no. house Type J (two-bed terrace)
- 2) Development of a crèche facility (374 sqm) and associated outdoor play areas and car parking.
- 3) Provision of new vehicular and pedestrian site access from the North-South Oranmore Distributor Road (the route of which was permitted under An Bord Pleanála Reference PL 07.237219, which was extended under Pl Ref 15/1334).
- 4) Provision of shared communal and private open space, site landscaping, car parking, site services and all associated site development works.

5.2 Key Planning Statistics

An overview of the key planning statistics is set out below in tabular format.

Table 1: Planning Statistics

Key Planning Statistic	Quantum	Area Dimension
Site Area		
Site Area (including RA zoned lands)	8.642	ha
Site Area (excluding RA zoned lands)	7.435	ha
Exclusion zone around castle	0.226	ha
Childcare facility / creche	0.138	ha
Lands associated with Irish Water connection	0.058	ha
Other exclusions (access road, road buffer, etc.)	0.174	ha
Net developable area	6.839	ha
Site Coverage		
Site Coverage (entire site)	16.92	%

Site Coverage (net developable area)	21.38	%
Plot Ratio		
Plot Ratio (entire site)	0.29	
Plot Ratio (net developable area)	0.37	
Plot Ratio (entire site) - with Attic conversion	0.32	
Plot Ratio (net developable area) - with Attic conversion	0.41	
Density		
Density (on net developable area)	31	per ha
Density (on net developable area)	12.55	per acre
Open Space		
Open Space	16,172	m ²
Open Space	947	m ²
Open Space	947	m ²
Open Space	4,868	m ²
Open Space	2,391	m ²
<i>Total Open Space</i>	<i>25,325</i>	<i>m²</i>
Open Space zoned Recreational / Amenity	10,080	m ²
Open Space within Residential zoned land	15,245	m ²
Exclusion Zone around castle	2,226	m ²
Open Space - (excluding RA zoned lands)	17.64	%
Open Space - (including RA zoned lands)	29.30	%
Open space - (excluding RA zoned lands and castle exclusion zone)	15.06	%

5.3 House Types

Table 2: Dwelling Mix Type

Dwelling Mix Type	No.		%	
2 bedroom (4 person)	68	no.	32.1	%
3 bedroom	70	no.	33.0	%
4 bedroom	74	no.	34.9	%
<i>Total</i>	<i>212</i>			
Duplex	56	no.	26.4	%
Terraced	22	no.	10.4	%
Semi-detached	118	no.	55.7	%
Detached	16	no.	7.5	%
<i>Total</i>	<i>212</i>			

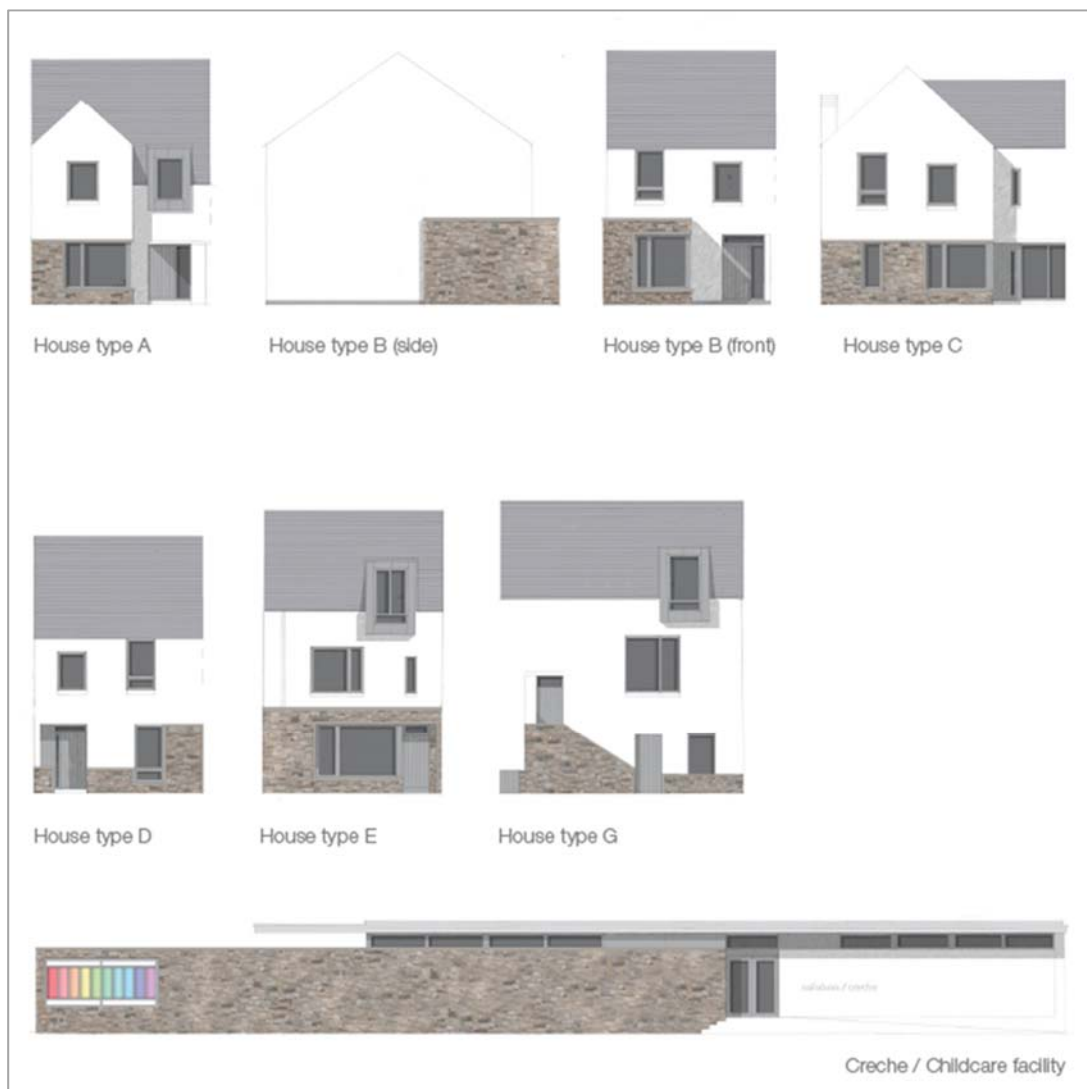


Figure 7: Dwelling Types. Extracted from SJK Design Statement (pg 32)

Table 3: Development Statistics

Type	Description	GFA	Attic Option	Footprint	No. of Dwellings	Total GFA	Total Footprint	Total GFA (incl attic)	Minimum Private Open Space Required	Minimum Private Open Space Provided
		m ²	m ²	m ²	No.	m ²	m ²	m ²	m ²	m ²
House Type A	4 bedroom semi-detached	132	28	76	34	4,474	2,581	5,426	66	77 - 300
House Type B	3 bedroom semi-detached	113	30	67	54	6,102	3,596	7,722	57	73 - 171
House Type C	4 bedroom detached	165	-	96	16	2,640	1,536	2,640	83	140 - 410
House Type D	3 bedroom terrace	115	30	66	16	1,840	1,053	2,320	58	73 - 207
House Type E	4 bedroom semi-detached	140	-	78	24	3,360	1,872	3,360	70	90
House Type G	2 bedroom (4 person) duplex - ground floor	76	-	104	25	1,900	2,600	1,900	7	14
	2 bedroom (4 person) + study duplex - first / second floor	103	-	incl.	25	2,575	incl.	2,575	7	18
House Type H	2 bedroom (4 person) apartment - ground floor	97	-	140	2	194	280	194	7	12
	2 bedroom (4 person) apartment - first / second floor	111	-	incl.	2	222	incl.	222	7	12
	2 bedroom (4 person) apartment - first/second floor	103	-	incl.	2	206	incl.	206	7	12
House Type J	2 bedroom terrace	93	28	57	12	1,116	684	1,116	47	51 - 87
Creche	Childcare facility (single storey)	373	-	422	1	373	422	N/A		265
				Dwellings	212	25,002	14,624	28,054		

5.4 Compliance with Part V of the Planning and Development Act, 2000 in respect of Social Housing

This section of the report details the Part V proposal on the proposed site. The relevant legislation regarding Part V Social Housing is contained within the *Planning and Development Act 2000 (as amended)* and the *Planning & Development Regulations, 2001 (as amended)*.

Under Section 96 of the Act the options for compliance with Part V are as follows:

- I. The transfer, to the Planning Authority of the ownership of part(s) of the land (10%) subject of the application, to be reserved for the provision of social housing.
- II. the building and transfer, on completion, to the ownership of the Planning Authority, or to the ownership of persons nominated by the, of houses on the land which is subject to the application for permission of such number and description as may be specified in the agreement.
- III. the transfer to the ownership of the Planning Authority, or to the ownership of persons nominated by the Authority, of houses on any other land within the functional area of the Planning Authority of such number and description as may be specified in the agreement.
- IV. the grant to the Planning Authority of a lease under the Housing Acts 1966 to 2014 of houses on the land which is subject to the application for permission, or on any other land within the functional area of the Planning Authority, of such number and description as may be specified in the agreement.
- V. a combination of a transfer of land and one or more of the options listed above, or a combination of 2 or more of any of the others.

Article 22(2)(e) of the Regulations outlines the details to be included as part of any residential planning application subject to Section 96 of the Act. It states the following:

“in the case of an application for permission for the development of houses or of houses and other development, to which section 96 of the Act applies, details as to how the applicant proposes to comply with a condition referred to in sub-section (2) of that section to which the permission, if granted, would be subject, including-

- i. details of such part or parts of the land which is subject to the application for permission or is or are specified by the Part V agreement, or houses situated on such aforementioned land or elsewhere in the planning authority’s functional area proposed to be transferred to the planning authority, or details of houses situated on such aforementioned land or elsewhere in the planning authority’s functional area proposed to be leased to the planning authority, or details of any combination of the foregoing, and*
- ii. details of the calculations and methodology for calculating values of land, site costs, normal construction and development costs and profit on those costs and other related costs such as an appropriate share of any common development works as required to comply with the provisions in Part V of the Act”*

As evident in the pre-consultation submission the applicant has engaged with the Housing Department of Galway County Council from the outset of the project to agree Part V through the transfer to the Planning Authority of the ownership of units on site to be reserved for the provision of social housing.

The proposed scheme includes 212 no. residential units. The applicant proposes providing 10% of the dwelling units to fulfil the scheme’s Part V obligation as detailed below.

Table 4: Part V Proposal

Part V Information Required	Part V Proposal																																																																		
<p>(i) details of such part or parts of the land for the proposed development or is or are specified by the Part V agreement, or houses situated on such aforementioned land or elsewhere in the planning authority’s functional area proposed to be transferred to the planning authority, or details of houses situated on such aforementioned land or elsewhere in the planning authority’s functional area proposed to be leased to the planning authority, or details of any combination of the foregoing, and</p>	<p>The applicant proposes to transfer 21 no. completed units within the proposed development to Galway County Council.</p> <p>The units include:</p> <table border="1" data-bbox="804 775 1445 1585"> <thead> <tr> <th>Unit Type</th> <th>Description</th> <th>Unit Number</th> </tr> </thead> <tbody> <tr><td>Type G</td><td>2 bed apartment</td><td>36</td></tr> <tr><td>Type G</td><td>2 bed apartment</td><td>38</td></tr> <tr><td>Type G</td><td>2 bed apartment</td><td>40</td></tr> <tr><td>Type D</td><td>3 bed terrace</td><td>59</td></tr> <tr><td>Type J</td><td>2 bed terrace</td><td>60</td></tr> <tr><td>Type D</td><td>3 bed terrace</td><td>61</td></tr> <tr><td>Type D</td><td>3 bed terrace</td><td>69</td></tr> <tr><td>Type J</td><td>2 bed terrace</td><td>70</td></tr> <tr><td>Type J</td><td>2 bed terrace</td><td>71</td></tr> <tr><td>Type D</td><td>3 bed terrace</td><td>72</td></tr> <tr><td>Type B</td><td>3 bed semi - detached</td><td>120</td></tr> <tr><td>Type B</td><td>3 bed semi - detached</td><td>121</td></tr> <tr><td>Type H</td><td>2 bed apartment</td><td>124</td></tr> <tr><td>Type G</td><td>2 bed apartment</td><td>127</td></tr> <tr><td>Type G</td><td>2 bed apartment</td><td>129</td></tr> <tr><td>Type G</td><td>2 bed apartment</td><td>131</td></tr> <tr><td>Type G</td><td>2 bed apartment</td><td>141</td></tr> <tr><td>Type G</td><td>2 bed apartment</td><td>143</td></tr> <tr><td>Type G</td><td>2 bed apartment</td><td>145</td></tr> <tr><td>Type G</td><td>2 bed apartment</td><td>147</td></tr> <tr><td>Type G</td><td>2 bed apartment</td><td>149</td></tr> </tbody> </table> <p>Please refer to Dwg 2325-P-033 for details of the location of the proposed units.</p>	Unit Type	Description	Unit Number	Type G	2 bed apartment	36	Type G	2 bed apartment	38	Type G	2 bed apartment	40	Type D	3 bed terrace	59	Type J	2 bed terrace	60	Type D	3 bed terrace	61	Type D	3 bed terrace	69	Type J	2 bed terrace	70	Type J	2 bed terrace	71	Type D	3 bed terrace	72	Type B	3 bed semi - detached	120	Type B	3 bed semi - detached	121	Type H	2 bed apartment	124	Type G	2 bed apartment	127	Type G	2 bed apartment	129	Type G	2 bed apartment	131	Type G	2 bed apartment	141	Type G	2 bed apartment	143	Type G	2 bed apartment	145	Type G	2 bed apartment	147	Type G	2 bed apartment	149
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<p>(ii) details of the calculations and methodology for calculating values of land, site costs, normal construction and development costs and profit on those costs and other related costs such as an appropriate share of any</p>	<p>In accordance with the <i>Planning & Development Regulations, 2001 (as amended)</i>, the applicant has provided estimated calculations and the methodology for calculating values for the proposed Part V units in Appendix C.</p>																																																																		

Part V Information Required	Part V Proposal
common development works as required to comply with the provisions in Part V of the Act, and	
(iii) a layout plan showing the location of proposed Part V units in the development?	Please see enclosed Dwg 2325-P-033

6 ASSESSMENT OF POTENTIAL ENVIRONMENTAL IMPACTS

6.1 Legislative Context

European Union Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment (the 'EIA Directive'), is currently transposed into Irish planning legislation by the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001 (as amended). The EIA Directive was amended by Directive 2014/52/EU the provision of which has which has been transposed into Irish law with the following legislation:

- S.I. 296 of 2018
 - European Union (Planning & Development) (Environmental Impact Assessment) Regulations 2018
 - Sn 28 Ministerial Guidelines, August 2018
 - Commenced 1st September 2018

- S.I. 646/2018
 - European Union (Planning & Development) (Environmental Impact Assessment) (Amendment) Regulations 2018
 - Bring into operation Sn 176A of the Act. Relate to screening determination
 - Commenced 1st January 2019

- S.I. 588/2018
 - Planning & Development (Housing) and Residential Tenancies Act 2017 Commencement Order
 - Brings into operation Sn 27 of the Act. Relates to screening determination
 - Operative date 1st January 2019

6.2 Screening for Mandatory EIA

With regards to the proposed development, the provisions of Schedule 5 require an EIA to be undertaken where it is proposed to carry out the following - "*Construction of more than 500 dwelling units*", as per Item 10 (b)(i) of the Schedule and (iv) urban development which would involve an area greater than either 10 ha (built up area) or 20ha (elsewhere).

The proposed residential development does not exceed the 500 unit threshold and does not propose urban development of an area greater than 10 hectares and therefore is not subject to mandatory EIA.

6.3 Screening for Sub-Threshold Environmental Impact Assessment

Section 172 of the Planning & Development Act 2000, as amended, also sets out the basis for EIA for developments which may not be of a scale included in Schedule 5 of the Planning & Development Regulations 2001, as amended. This allows a consenting authority to require EIA where it is of the opinion that a development (although sub-threshold) is likely to have significant effects on the environment and therefore should be subject to EIA. In this context, the consideration of 'significant effect' should not be

determined by reference to size only and the nature and location of a project must also be taken into account.

Class 15 of Schedule 5 provides for EIA/EIAR for developments under the relevant threshold, where the works would be likely to have significant effects on the environment. This states the following:

“Any project listed in this Part which does not exceed a quantity, area or other limit specified in this Part in respect of the relevant class of development but which would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.”

The proposed residential development is a project which falls under Schedule 5 and has been screened in for EIA given its nature, size (c8.6 hectares) and location close to an environmentally sensitive area i.e. the Galway Bay Complex Special Area of Conservation (site code: 000268).

The applicant has prepared an **Environmental Impact Assessment Report** to support the current application, which is enclosed with this application as a standalone document.

6.4 Environmental Impact Assessment Report

An **Environmental Impact Assessment Report** (EIAR) has been prepared by McCarthy Keville O’Sullivan Ltd. (MKO) on behalf of Arlum Ltd., which intends to apply to An Bord Pleanála (ABP) under the *Planning and Development Act 2000* (as amended by the *Residential Tenancies Act 2016*) for a strategic housing scheme located in the townlands of Moneyduff and Oranhill, Oranmore, Co. Galway.

The EIAR submitted by the applicant provides the relevant environmental information to enable the Environmental Impact Assessment to be carried out by the competent authority. The information to be contained in the EIAR is prescribed by statutory regulation.

7 APPROPRIATE ASSESSMENT

7.1 Legislative Context

Article 6.3 of the Habitats Directive 92/43/EEC requires that an Appropriate Assessment (AA) should be carried out where plans or projects may have a significant effect on the conservation objectives that would ultimately affect the integrity of Natura 2000 sites. A Stage One AA Screening Report for the proposed development has been prepared for the subject development by McCarthy Keville O’Sullivan Planning and Environmental Consultants, and is submitted in support of this application to An Bord Pleanála.

The submitted AA Screening Report has been prepared in accordance with the European Commission guidance document Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites: Methodological Guidance on the provisions of Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC (EC, 2001) and the Department of the Environment’s Guidance on the Appropriate Assessment of Plans and Projects in Ireland (December 2009, amended February 2010).

The screening assessment concluded as follows:

“In view of best scientific knowledge, on the basis of objective information and in light of the conservation objectives of the relevant European sites, it is concluded that the Proposed Development, whether individually or in combination with other plans or projects, beyond reasonable scientific doubt will not have significant effects on the following European Sites. They have therefore been screened out.

- *Lough Fingall Complex SAC (000606)*
- *Lough Corrib SAC (000297)*
- *Rahasane Turlough SAC (000322)*
- *Castletaylor Complex SAC (000242)*
- *Kiltiernan Turlough SAC (001285)*
- *Ardrahan Grassland SAC (002244)*
- *East Burren Complex SAC (001926)*
- *Lough Corrib SPA (004042)*

It cannot be excluded beyond reasonable scientific doubt, in view of best scientific knowledge on the basis of objective information and in light of the conservation objectives of the relevant European site, that the Proposed Development, individually or in combination with other plans and projects could have a significant effect on the following European Sites:

- *Galway Bay Complex SAC (000268)*
- *Inner Galway Bay SPA (004031)*
- *Cregganna Marsh SPA (004142)*
- *Rahasane Turlough SPA (004089)*

As a result, an Appropriate Assessment of the Proposed Development is required, and a Natura Impact Statement shall be prepared in respect of the proposed development”.

In light of the finding of the Screening report, a **Natura Impact Statement (NIS)** has been prepared in accordance with the European Commission guidance document *Assessment of Plans and Projects Significantly affecting Natura 2000 Sites: Methodological Guidance* on the provisions of Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC (EC, 2001) and the Department of the *Environment's Guidance on the Appropriate Assessment of Plans and Projects in Ireland* (December 2009, amended February 2010).

Please refer to the standalone NIS for further details.

7.2 Summary of Findings

The summary of the NIS is provided below:

"It can be concluded, on the basis of objective scientific information, that the proposed development, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site."

8 PLANNING ASSESSMENT

Section 3.3.2 of the *Galway County Development Plan* (GCDP) states that the Council's primary aim in relation to residential development is to deliver high quality, sustainable living environments which are attractive, safe and vibrant and meet the needs of the residents and the community. In planning for future development and in assessing future development proposals, the Council will seek to ensure that:

- The overall design approach is to create a community rather than a new housing development;
- While residentially zoned areas are intended primarily for housing development, a range of other uses, particularly those that have the potential to foster the development of new residential communities may be considered e.g. crèches, schools, nursing homes or homes for older persons, open space, recreation and amenity uses;
- To create high standards of layout, design, and landscaping, and to achieve a general segregation from roads used by through traffic from the outset;
- Appropriate provision is made for amenity and public open space as an integral part of new development proposals;
- The physical design of a proposed development should accord with the policies and objectives set out in the development standards contained in Chapter 13 (Development Management Standards and Guidelines) of the GCDP;
- Proposed developments must also have regard to the policies and objectives for architectural and archaeological heritage set out in Chapter 9 (Heritage, Landscape and Environmental Management) of the GCDP.

These criteria are detailed in policy terms, through the objectives of the plan as well as through the various other policy/guidance documents at local and national level. Having reviewed these documents in the context of the proposed development, we consider that the key issues relating to the proposed development are:

- Principle of the Development
- Access, Traffic and Transportation
- Design:
 - Density/Plot Ratio
 - Site Coverage
 - Open Space
 - Parking
- Design Statement
- Impact on Cultural Heritage
- Impact on Biodiversity
- Flood Risk
- Ancillary Uses
- Statement of Compliance with the Design Manual for Urban Roads and Streets (DMURS)
- Statement of Compliance with national, regional and local planning policy.

8.1 Principle of Development

8.1.1 Compliance with Core Strategy

At a county planning policy level, the proposed development is governed by the policies and provisions contained in the GCDP which identifies Oranmore as a 'Key Town' with a population >1500. It is noted that the settlement of Oranmore is featured in both Tier 1 (Galway Metropolitan Area) and Tier 4 (Key Town), with an explanation provided on Page 40 of the GCDP that the Galway Metropolitan Area only encompasses part of the LAP area of Oranmore. The proposed site is located in the Electoral District of Clarinbridge, therefore it is located outside the Galway Metropolitan Area (GMA), as illustrated on **Figure 1** above in Section 2.1.

'Objective SS 5 (Development of Key Towns)' of the GCDP aims to support the development of the key towns of the County as outlined in the Core Strategy and Settlement Strategy in order to sustain strong, vibrant urban centres which act as important drivers for the local economies, reduces travel demand and supports a large rural hinterland, while providing a complementary role to the hub town of Tuam and the smaller towns and villages in the County.

Over the lifetime of the GCDP (i.e. 2015-2021) the Core Strategy estimates that the settlement of Oranmore can accommodate an increase in population of 1,170 people, with an associated requirement for 363 new homes.

The proposed development is consistent with the requirements of the Core Strategy and the Settlement Strategy which seeks to support the development of the key towns of the County. The proposed development will contribute towards meeting the 363 no. new dwellings target provided for in the housing allocation.

8.1.2 Compliance with Zoning Objectives

The application site is located in an area zoned 'R1' – Residential (Phase 1) and 'OS' – Open Space/Recreation and Amenity, within the current *Oranmore LAP 2012-2022*. Lands identified as 'R1' are allocated for short term-medium term growth.

The proposed scheme comprises the development of 212 no. residential units and a childcare facility on the lands zoned for 'R1'. No built development is proposed on the 'OS' designated land. The development proposal includes for landscaping improvements to the 'OS' lands to form a buffer zone to the adjacent SAC lands to the west of the application site. The development of a greenfield site on residential zoned land accords with the 'R1' residential zoning and 'Objective LU 3 – Residential (R)' of the LAP. 'Objective DS6 – Residential Development Phasing' requires that development be directed into lands which are zoned and serviced. Accordingly, this report considers the development is acceptable in principle.

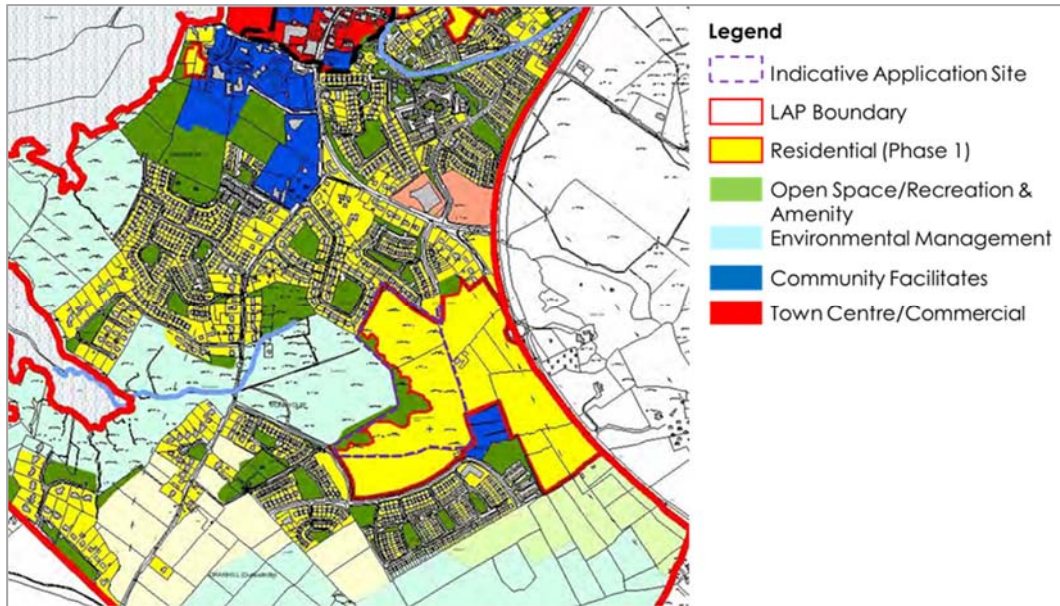


Figure 8: Extract from the Oranmore LAP Land Use Zoning Map, edited by MKO.

8.2 Access, Traffic and Transportation

This section of the report details the proposed access and transportation arrangements. The following items are presented for An Bord Pleanála's consideration:

- Section 8.2.1 Provides information on the background to the proposed access route via the permitted Roykeel Ltd development which is located immediately east of the application site. The report provides an overview of the legal agreement in place between the applicant and Roykeel Ltd and the conditions compliance agreements that have been reached with Galway County Council in relation to the permitted North-South Link Road.
- Section 8.2.2 Provides a summary of the **Traffic and Transportation Statement** prepared by Tobin Consulting Engineers which addresses traffic and transportation aspects of the proposed scheme. Items discussed include, *inter alia*, the proposed road infrastructure, traffic generation, pedestrian and cyclist linkages and safety, public transport availability and road capacity.
- Section 8.2.3 Presents a summary of the **Statement of Consistency with Ministerial Guidance- Design Manual for Urban Roads and Streets (DMURS)** which has been prepared by Tobin Consulting Engineers. This section includes information on matters agreed with Galway County Council in relation to the provision of a new footpath on the L4103, Old Limerick Road, to ensure residents living in the proposed development have access to a continuous footpath to Oranmore town centre.

8.2.1 Access Arrangements

To the east of the application site is the Roykeel Ltd. scheme comprising a proposed hotel, 161 no. dwelling housing development and associated road infrastructure, including the permitted North-South Link Road. The scheme was granted planning permission on 1st December 2010 under An Bord Pleanála Ref PL 07.237219 / Galway County Council (GCC) Pl Ref P09/1925. The application was extended by GCC Pl Ref 15/1334 and will expire on 20th December 2020. Development has not yet commenced on this site.

Access to the proposed development is to be facilitated via the road infrastructure proposed as part of the adjoining Roykeel Ltd. scheme, as already permitted. The proposed road infrastructure of the Roykeel Ltd. scheme will comprise the construction of a new North-South Link Road, from the existing road network infrastructure of the Coill Clocha Housing in the North (which has been taken in charge by Galway County Council), to the Orancourt / Oranhill Housing Estate in the South. In addition, a link road from the N67 Rocklands Roundabout Junction to the East is proposed across the adjacent Roykeel Ltd. site, to the proposed application site, linking with the proposed North-South Link Road as detailed in **Figure 9**.



Figure 9: Proposed Development in context of Road Network Infrastructure Permitted under GCC PR 09/1925; ABP Ref 07.237219 & 15/1334. Image extracted from Figure 2.2 of Traffic and Transportation Statement

A network of footpaths and cycle paths throughout the proposed development will provide a high rate of accessibility to the local facilities within the town of Oranmore. The inclusion of these attractive, well designed walking routes will encourage pedestrians to access the local facilities on foot as opposed to taking their personal vehicles. Further information on the pedestrian accessibility of the site is provided below in the Section 8.2.3 and in the **Statement of Compliance with DMURS** which is included with this application.

A legal agreement is in place between the applicant, Arlum Ltd., and the adjoining owner, Roykeel Ltd., for the construction of the access road from the existing roundabout on the N67, the North-South Link Road and the proposed roundabout where the two proposed roads meet. The applicant is the registered owner of the property described in Folio 121724F which has the benefit of a right of way, wayleave and other easements, which allows access and egress to and from the N67 public road. Subject to the provisions of the legal agreement, the applicant Arlum Ltd has an entitlement to construct the roads and services necessary for development of the development that is the subject of this application. See **Appendix B** for details.

Galway County Council (Michael Timmons, Director of Planning and Valerie Loughnane, Senior Planner) confirmed in a meeting with the applicant on 25th January 2018 that there is no planning issue which would prevent the adjoining owner, Roykeel Ltd. (or Arlum Ltd. acting on their behalf) completing the access road under Phase 1 of the existing Pl Ref 15/1334 planning permission as the scheme is permitted. See **Appendix A** for a note of the meeting.

Arlum Ltd (acting on behalf of Roykeel Ltd) have commenced conditions compliance with Galway County Council in relation to all roads related conditions included in the grant of permission associated with ABP Ref PL 07.237219 / GCC Pl Ref P09/1925) which was extended by GCC (Pl Ref 15/1334). Under Pl Ref 15/1334, the proposed road network infrastructure was conditioned to include the upgrading of the proposals for the inclusion of dedicated Pedestrian and Cycle Facilities. This detail has been incorporated into the designs, with the details agreed with Galway County Council. See Section 8.2.1.1 below for further details.

In addition, the findings of the Inspectors Report on ABP Reference 301952-18 in relation to the proposed access arrangements are summarised in section 8.2.1.2 below for convenience.

8.2.1.1 Pre-Commencement Conditions Compliance

Arlum Ltd (acting on behalf of Roykeel Ltd) have commenced conditions compliance with Galway County Council in relation to all roads related conditions included in the grant of permission associated with ABP Ref PL 07.237219 / GCC Pl Ref P09/1925) which was extended by GCC Pl Ref 15/1334. Following discussions with the Galway County Council Roads Department, the following conditions compliance proposals were submitted to the Planning Authority for agreement.

Condition No. 4

As per Condition 4, the North/South link road will be included in Phase 1 of the development. We also confirm that the link road to the N67 (via Rocklands roundabout) is included in Phase 1 as requested by the Roads Department of Galway County Council, for the provision of construction traffic access (see attached **Phasing Layout Drawing No. 10402-1015** in **Appendix D(1)**). The remaining phases shall be agreed with the Planning Authority on completion of Phase 1 as stipulated in the Condition 4.

The link road from the roundabout will serve the site for construction access to the future phases, therefore avoiding the need to access the future phases through or via the existing adjoining housing estates. The North/South link road will be constructed up to the existing estate roads but not actually opened for public use until the future phases are progressed. This approach will greatly assist the health and safety of the construction site during the various construction phases.

Condition No. 10:

With regard to the access road to the proposed development only, and following our meeting and correspondence with the Roads Department, we have revised elements of this access road within the permitted corridor to achieve the current DMURS standards as requested by the Roads Department of Galway County Council (See **Phase 1 Road Layout Drawing No. 10402-1016** in **Appendix D (1)**).

Condition No. 15:

As per condition 15 and the discussions on same, the required lighting scheme will be designed by a competent public lighting designer so as to meet the design and performance requirements set out in the latest edition of the European Standard EN13201-2 & BS 548G-1: 2014. The luminaires used shall be LED type only and shall be approved for use on the Triple E Register operated by Sustainable Energy Associated Ireland (SEAI). The lighting scheme shall incorporate a trimming and dimming regime to 75% of the light output between the hours 12.00 midnight and 6.00am to match Unmetered Registrar (UMR) approved burn profile.

Galway County Council, in correspondence dated 21st June 2018, have confirmed that the Planning Authority is satisfied that the documents submitted with respect to Condition No. 4 and Condition No. 10 under ABP Ref PL07.237219 is in compliance with the provisions of the conditions. Please see **Appendix D(2)** for a copy of the correspondence. Accordingly, if the Board are minded to grant the proposed development, Arlum Ltd can submit a Commencement Notice and commence construction of the permitted North-South Link Road to provide access to the application site.

8.2.1.2 Findings of the Inspectors Report on ABP Reference 301952-18 in relation to the Proposed Access Arrangements

This report would like to clarify that the proposed access arrangements are unchanged from the previous SHD application on the proposed site under ABP reference 301952-18. We note that in that instance, the Inspector's Report (page 35) found that the proposed access arrangements are acceptable in principle:

"These arrangements are acceptable in principle and I recommend that, if permission is granted, a condition is imposed requiring the construction of the proposed link roads in advance of the remainder of the development. While the concerns of the residents of Coill Clocha are noted, the north/south link at this location is an objective of the current Oranmore LAP and, as per the comment of Galway County Council, was originally envisaged under the 2000 Oranhill Area Action Plan. In addition, the access through Coill Clocha must be considered in the context of the overall road works proposed, i.e. a new link to the N67 to the east and to Oranhill to the south. The proposed roads layout is considered acceptable on this basis."

See Appendix E for a full copy of the ABP Reference 301952-18 Inspectors Report.

8.2.2 Traffic and Transportation

Tobin Consulting Engineers have prepared a **Traffic and Transportation Statement** on how the proposed development would address traffic and transportation issues, including road infrastructure, traffic generation, pedestrian and cyclist linkages and safety, public transport availability and capacity.

A meeting was held with Galway County Councils Roads Department on Friday 20th of January 2018 in relation to the requirements for:

- A Traffic and Transportation Assessment Report;
- A Road Safety Audit Report; and
- A Workplace Travel Plan Report.

During the meeting it was advised that as the road infrastructure proposed under GCC Pl Ref 09/1925 (and extended under 15/1334) was designed to facilitate access to the development proposed under Pl Ref 09/1925, and to operate as a link road to serve traffic from the N67 National Route to the Maree Road (and future development), that a requirement for a Traffic and Transportation Assessment would not be required. In lieu of a Traffic and Transportation Assessment, a statement with respect to the Traffic Volumes envisaged by the proposed Development should be included in the application.

GCC also advised that a Workplace Travel Plan Report would not be required for the proposed development. A Road Safety Audit would be required for the proposed site layout, in accordance with the requirements of the *Design Manual for Urban Roads and Streets*. GCC advised that a Road Safety Audit of the road infrastructure proposed

under GCC PR 09/1925 & 15/1334 would not be required in support of this SHD application.

The proposed development has integrated a number of measures in line with the relevant standards and guidelines, such as DMURS 2013 and the National Cycle Manual, which promotes the use of sustainable travel to and from the site. **The Road Safety Audit** carried out for the site allowed the design team to address any concerns initially flagged in the road safety audit. A continued and collaborative approach with the road safety auditors meant that a desirable and safe site layout could be achieved without negatively impacting the overall quality of the development.

The use of the private car will still be maintained as a primary mode of transport for a number of the residents in the development. Trip generations to and from the proposed development are 108 in the morning peak and 131 in the evening peak. Please see the enclosed **Traffic and Transportation Statement** for further details.

It should be noted that due to the significant reduction in traffic volumes on the N67 since September 2017, as a result of the opening of the new M18 motorway, any increase in volumes on the N67 as a result of the proposed development will not have a significant impact. Please see the enclosed **Traffic and Transportation Statement** for further details.

The internal roads on the development and the permitted link roads to be constructed adjoining the N67 and the development have been suitably designed in accordance with the DMURS manual. Progressive and regular liaison with Galway County Council Roads Department in relation to the internal roads and the permitted link roads layouts contributed to the final road design for the development. Please see **Appendix A** for a copy of the meetings held with Galway County Council **and Appendix D(1) and D(2)** for a copy of the conditions compliance submission and Galway County Council response in relation to all roads related conditions included in the grant of permission associated with ABP Ref PL 07.237219 / GCC Pl Ref P09/1925) which was extended by GCC Pl Ref 15/1334.

8.2.3 Compliance with Design Manual for Urban Roads and Streets

Tobin Consulting Engineers have prepared a **Statement of Consistency with Ministerial Guidance- Design Manual for Urban Roads and Streets (DMURS)** which is included with this application as a standalone document, a summary of which is provided overleaf in **Table 4**.

A network of footpaths throughout the proposed development will provide a high rate of accessibility to the local facilities in the town of Oranmore. Please refer to **Dwg 2325-P-038 Site Pedestrian Access Routes Plan** for details of the internal footpath locations and the connection to wider amenities within Oranmore town. The inclusion of these attractive, well designed walking routes will encourage pedestrians to access the local facilities on foot as opposed to taking their personal vehicles. The main pedestrian and cyclist access route to the proposed development from nearby Oranmore village centre will be via the Coill Clocha residential development to the north, which has been taken in charge by Galway County Council (see enclosed **Galway County Council Letter of Consent**). Pedestrians shall utilise the existing pedestrian arrangements within the Coill Clocha housing development which will connect to the newly constructed pedestrian pathway along the link road and throughout the proposed development. This will result in a continuous pedestrian route from all locations within the proposed development to Oranmore town centre. Refer to **Dwg 2325-P-038 Site Pedestrian Access Routes Plan** for proposed connections. A secondary pedestrian and cyclist

route is also provided to the south of the link road permitted under PR 15/1334. This allows users to access Oranmore village and the Maree road via the existing Oranhill housing estate.

Pedestrian routes from the proposed development to the Oranmore town centre will be 1 km in length and will take the average pedestrian 10 min to walk. Amenities in and around the town centre include local primary and secondary schools, shops, and restaurants. See **Figure 10** below.

The development is within a 10-minute walk to the nearest bus stop which is located opposite the church on Main Street. The bus route 404 operated by Bus Eireann serves this location and provides a route into Galway City every 60 mins. The duration of the trip to Galway city centre is circa 30 minutes with the bus availing of several bus lanes along the route.

The applicant has made a representation to Galway County Council in relation to the provision of a new footpath on the L4103, Old Limerick Road, to ensure residents living in the proposed development have access to a continuous footpath to Oranmore town centre. In correspondence dated 22nd June 2018, the local authority has set out the following options to deliver the footpath:

- a) In the event of a grant of permission on the proposed scheme, Galway County Council will seek a developer contribution towards the development of the footpath from Arlum Ltd; or
- b) Galway County Council would consider entering into an agreement with Arlum Ltd for the applicant to provide a footpath on behalf of Galway County Council.

It is noted that the hard shoulder on the southern side of the L4103 is at least 3 metres in width and Galway County Council have confirmed in correspondence dated 22nd June 2018 that the requisition of lands would not be required to facilitate the provision of a new footpath. Galway County Council have estimated that the cost of providing this footpath is less than the Part VIII Planning threshold, therefore they would not require planning permission to implement the proposed footpath. A copy of the correspondence received from Galway County Council in relation to the above matter is provided in **Appendix D3**.

8.2.3.1 Findings of the Inspectors Report on ABP Reference 301952-18 in relation to compliance with DMURS

This report would like to clarify that the proposed layout and design in relation to DMURS remains unchanged from the previous SHD application on the proposed site under ABP reference 301952-18. We note that in that instance, the Inspector's Report (page 35) found that the proposed measures were acceptable in principle:

"The internal roads layout has been designed to reduce vehicle speeds in accordance with the principles of DMURS with narrow road profiles, small corner radii and the use of hard surfaces and landscaping features to denote pedestrian areas and open spaces. The layout is accessible to cyclists and includes pedestrian routes through the open spaces with pedestrian crossings at appropriate locations. Vehicular permeability is more limited with many of the 'shared spaces' laid out as cul-de-sacs.

The application includes a statement of DMURS compliance and the findings of a Road Safety Audit have been incorporated into the design. The roads layout provides a clear hierarchy and is acceptable overall with regard to DMURS. I

consider that the development achieves a good level of connectivity to surrounding residential areas and the provision of a new footpath on the L4103 will improve connectivity of the area to Oranmore town centre [...].
[Para 10.4.2]

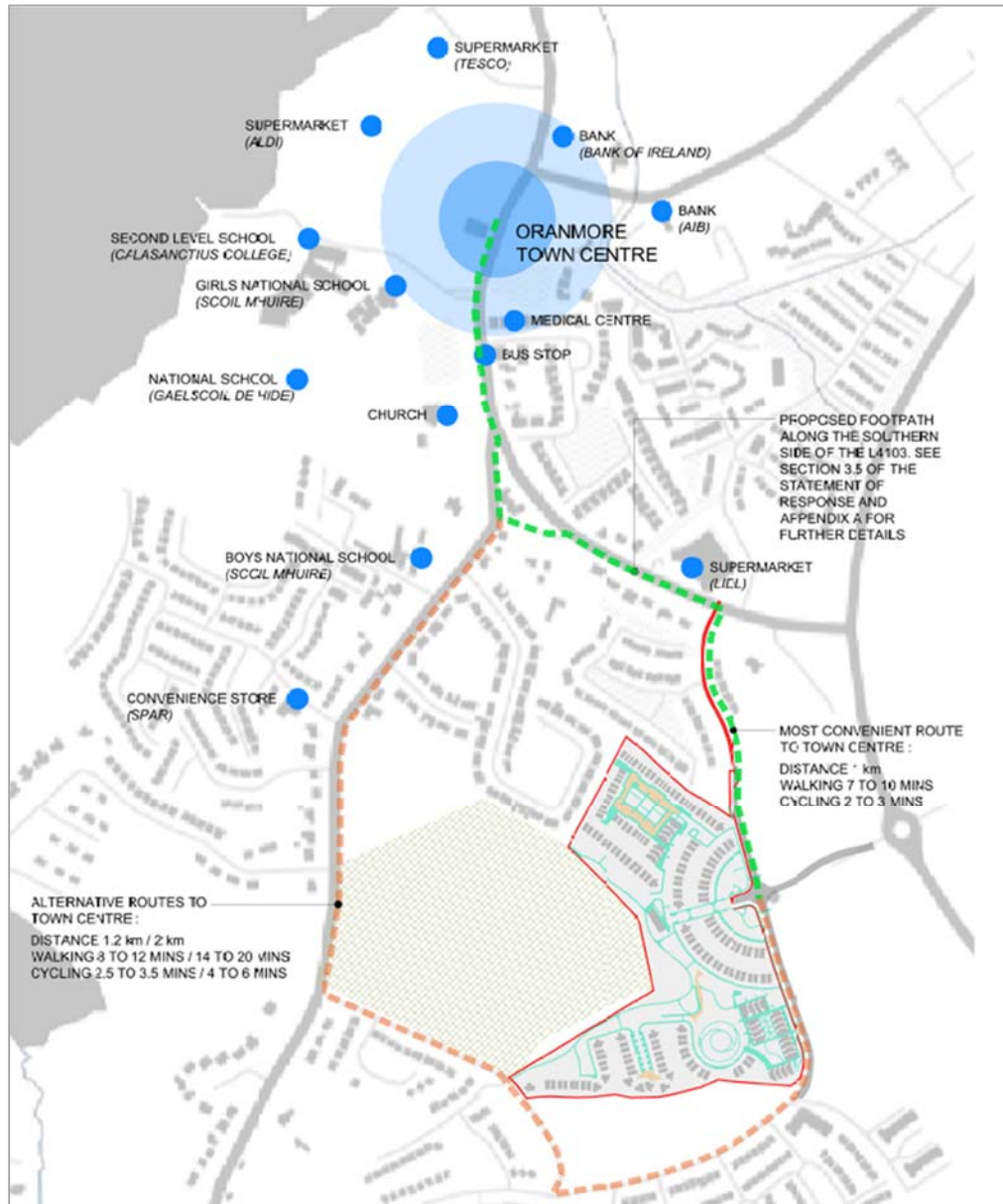


Figure 10: Accessibility to Oranmore Town Centre. Image extracted from 'Dwg 2325-P-038 Site Pedestrian Access Routes Plan'

Table 5: Compliance with Design Manual for Urban Roads and Streets

DMURS (2013) Design Principles	Statement of Consistency
<p>Design Principle 1: To support the creation of integrated street networks which promote higher levels of permeability and legibility for all users, and in particular more sustainable forms of transport.</p>	<ul style="list-style-type: none"> ▪ The street networks within the development have been designed to maximise connections between local areas and services. Upon completion, there will be a safety pedestrian connectivity to Oranmore town centre. ▪ A high degree of permeability and legibility have been provided with the proposed layout creating a legible network of streets and footways which are easy to navigate for both drivers and pedestrians. ▪ The overall design delivers a road networks that is generally curvilinear in nature. ▪ Access to the proposed development is to be facilitated via the road infrastructure proposed as part of an adjoining committed development, as already permitted (see Section 8.2.1 above for details). As noted above, under Planning Reference 15/1334, the proposed road network infrastructure was conditioned to include the upgrading of the proposals for the inclusion of dedicated Pedestrian and Cycle Facilities. This detail has been incorporated into the designs, with the detail agreed with Galway County Council as part of the Pre-Commencement Conditions Compliance for the adjacent land.
<p>Design Principle 2: The promotion of multifunctional streets that balance the needs of all users within a self regulating environment.</p>	<ul style="list-style-type: none"> ▪ The road network design throughout the proposed development consists of short, mainly curved stretches. These deliberately incorporated road features not only create a pleasing experience for the pedestrians and drivers but creates a passive method for controlling the speed of the vehicular movements throughout the development. ▪ The main form of parking for homeowners in the development shall be 'in-curtilage'. This has been specifically designed to align with homeowners' preference to have their private vehicles positioned within the limitations of the individual site ownership and to avoid a feeling of over dominance associated with having the majority of parking located on-street.
<p>Design Principle 3: The quality of the street is measured by the quality of the pedestrian environment.</p>	<ul style="list-style-type: none"> ▪ Vertical deflections or raised crossing areas have been positioned throughout the proposed development at specific considered locations to promote lower speed limits in addition to providing suitable crossing points for pedestrian at-grade. These raised crossings shall provide the pedestrian with a sense of priority over vehicular movements at these interfaces. While footways adjacent to the roads have been provided through the development, a further independent network of footways is

DMURS [2013] Design Principles	Statement of Consistency
	<p>included through the open spaces away from vehicular routes.</p> <ul style="list-style-type: none"> ▪ The pedestrian crossings located throughout the development are strategically positioned along key travel desire lines with the crossings having a min width of 1.6m wide. Pedestrian footways adjacent to the carriageways are min 2.0m wide with the footway meandering through the open spaces 1.8m wide. Road widths throughout the development are predominantly 5.5m wide (with local road at the south of the site 5.0m wide) in accordance with the guidance in DMURS (2013) section 4.4.1. The shared paved access road adjacent to the playground has a maximum width of 3.7m. ▪ The internal layout of the proposed development incorporates a number design features such as distinctive surface materials and colours which will establish a sense of place while increasing the overall safety of providing a shared surfacing for all road users. The inclusion of a shared paved vehicular and paved areas and an abundance of planting/vegetation will also encourage lower vehicle speeds throughout the development and give the pedestrian a sense of priority.
<p>Design Principle 4: Greater communication and cooperation between design professionals through the promotion of a plan led, multidisciplinary approach to design.</p>	<ul style="list-style-type: none"> ▪ The design of the proposed housing development in Moneyduff, Oranmore has been carried out taking into account considerations from many disciplines including town planning, architecture, landscaping architecture, engineering, environmental, conservation and heritage specialists. ▪ The design team have progressed through several iterations of the layout in line with comments received from each discipline and Galway County council to arrive at a solution which meets the guidance outlined in the DMURS. ▪ The resulting layout provides a development of high standard which incorporates spatial requirements and takes into account relevant plans and policies.

8.3 Design Standards (Density/Plot Ratio, Site Coverage, Open Space, Parking)

8.3.1 Density and Plot Ratio

LAP 'Objective LU 15 – Residential Densities' promotes a range of residential densities within the LAP area appropriate to the prevailing development pattern, supporting infrastructure, urban character and heritage resources in accordance with the guidance in *Sustainable Residential Development in Urban Areas Guidelines 2009*.

As noted previously in Section 2.1, the proposed site is a designated 'Key Town', within the Electoral District of Clarinbridge; accordingly, the site is located outside the defined Galway Metropolitan Area. The proposed site is located in the townland of Moneyduff, approximately 590m south of the centre of Oranmore and is considered to be an 'Inner Urban Suburban' location, as defined in Section 3.1.3 of the Oranmore LAP.

Furthermore, Census 2016⁴ revealed that the current population statistics available for Oranmore indicates that the settlement has a population of **4,900 people**. Therefore, the proposed site is considered to fall under the 'Small Town and Villages' category of the *Sustainable Residential Development in Urban Areas Guidelines 2009*, which defines such settlements as having a population range between 400 and 5,000 people.

Accordingly, the pertinent density guidelines for the proposed site are set out in:

- Section 3.1.3 of LAP (plot ratio): promotes a plot ratio range of 0.10 to 0.50 for residential development;
- Section 3.1.3 of LAP (units per hectare): Low to Medium Residential Density requires 15-35 dwelling units/hectare based on the site's inner urban suburb location; and
- Section 6.11 of the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* provides for 20-35 dwelling units/hectare on 'Edge of Centre' sites.
- Section 2.4 of the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, (March 2018)* states identification of the types of location in cities and towns that may be suitable for apartment development, will be subject to local determination by the planning authority, having regard to broad descriptions of proximity and accessibility considerations set out in **Table 5**. Based on the criteria set out in the 2018 Apartment Guidelines, the proposed site location is categorised as a 'Peripheral and/or Less Accessible Urban Location'; where residential development of any scale that includes a minority of apartments at low-medium densities (circa <45 dwellings per hectare net).
- SPPR 4 of the *Urban Development and Building Height Guidelines for Planning Authorities* includes a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:
 1. The minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "*Sustainable Residential Development in Urban Areas (2007)*" or any amending or replacement Guidelines;

⁴ Data available on: <http://www.cso.ie/en/census/>

2. A greater mix of building heights and typologies in planning for the future development of suburban locations; and
3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more

Table 6: Types of location in cities and towns that may be suitable for apartment development.

Area Type	Description
1. Central and/or Accessible Urban Locations	<p>Such locations are generally suitable for small- to large-scale (will vary subject to location) and higher density development (will also vary), that may wholly comprise apartments, including:</p> <ul style="list-style-type: none"> ▪ Sites within walking distance (i.e. up to 15 minutes or 1,000- 1,500m), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions; ▪ Sites within reasonable walking distance (i.e. up to 10 minutes or 800- 1,000m) to/from high capacity urban public transport stops (such as DART or Luas); and Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to/ from high frequency (i.e. min 10-minute peak hour frequency) urban bus services.
2. Intermediate Urban Locations	<p>Such locations are generally suitable for smaller-scale (will vary subject to location), higher density development that may wholly comprise apartments, or alternatively, medium-high density residential development of any scale that includes apartments to some extent (will also vary, but broadly >45 dwellings per hectare net) including:</p> <ul style="list-style-type: none"> ▪ Sites within or close to i.e. within reasonable walking distance (i.e. up to 10 minutes or 800- 1,000m), of principal town or suburban centres or employment locations, that may include hospitals and third level institutions; ▪ Sites within walking distance (i.e. between 10-15 minutes or 1,000-1,500m) of high capacity urban public transport stops (such as DART, commuter rail or Luas) or within reasonable walking distance (i.e. between 5-10 minutes or up to 1,000m) of high frequency (i.e. min 10-minute peak hour frequency) urban bus services or where such services can be provided; ▪ Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (min 15-minute peak hour frequency) urban bus services.

Area Type	Description
3. Peripheral and/or Less Accessible Urban Locations	<p>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), including:</p> <ul style="list-style-type: none"> ▪ Sites in suburban development areas that do not meet proximity or accessibility criteria; ▪ Sites in small towns or villages.
<p>Extracted from Section 2.4 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities.</p>	

Section 3.1.3 of the LAP promotes a plot ratio range of 0.10 to 0.50 for residential development. The proposed scheme achieves a plot ratio of 0.36 on the land zoned for 'R1' development. The proposed house designs provide for the provision of habitable spaces in the attic area of a number of units, which would increase the plot ratio to 0.41. Therefore, the proposed scheme is in accordance with the LAP plot ratio standards.

The location of the development site stipulates a low-medium density in the LAP equating to 15-35 dwellings/hectare for inner urban suburbs. In relation to required LAP densities, the proposed development layout achieves 31 units/hectare, which is at the higher end of the required density for the site location. Furthermore, the proposed density is considered to accord with Section 6.11 of the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* as they relate to 'Edge of Centre' sites and Section 2.4 of the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, (March 2018)* as they relate to 'Peripheral and/or Less Accessible Urban Locations'.

In conclusion, this report contends that the proposed density is acceptable as it aligns with the guidelines set out in the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, (March 2018)*, the *Sustainable Residential Development in Urban Areas Guidelines 2009* and the extant Oranmore LAP.

Furthermore, it is noted that An Bord Pleanála recently granted permission for 61 no. residential units on a 2.67-hectare site, on lands located immediately south of the proposed site, which equates to 22.8 units per hectare (see An Bord Pleanála reference PL 61.246315 for further details). Therefore, this report contends that the proposed development is in accordance with LAP 'Objective LU 15 – Residential Densities' which promotes residential densities within the LAP area appropriate to the prevailing development pattern.

8.3.1.1 Findings of the Inspectors Report on ABP Reference 301952-18 in relation to Density

This report would like to clarify that the proposed site density remains unchanged from the previous SHD application on the proposed site under ABP reference 301952-18. We note that in that instance, the Inspector's Report found that the proposed density was acceptable in principle:

“[...] given the site constraints including flood zones, proximity to a pNHA and to several European sites, roads objectives and the presence of a Recorded Monument, it is considered that the overall density is appropriate.”
 [Paragraph 10.2.2]

8.3.2 Site Coverage

Site Coverage refers to the percentage of gross floor area of the building/s footprint on the site. Section 3.1.3 of the extant LAP sets a maximum site coverage of 50% for zone ‘R’ land. The proposed site coverage equates to:

- Site coverage (including RA zoned lands): 16.69 %
- Site Coverage (excluding RA zoned lands): 21.08 %

Accordingly, this report contends that the proposed site coverage is acceptable as it aligns with the guidelines set out in Section 3.1.3 of the extant Oranmore LAP.

8.3.3 Open Space

8.3.3.1 Communal Open Space

‘Objective RD 4 – Open Space in Residential Areas’ requires the provision of adequate areas of high quality, safe and overlooked open space within residential developments and to support the provision of play and recreational areas in all new large residential developments. DM Guideline LU1 – Development Densities requires 15% as a minimum open space provision.

The schedule of open space proposed within the application site is set out below:

Open Space	Quantum	Area
Open Space Zoned Recreational / Amenity	10,080	m ²
Open Space within Residential zoned land	15,245	m ²
Exclusion Zone around castle	2,226	m ²
Open Space - (excluding RA zoned lands)	17.64	%
Open Space - (including RA zoned lands)	29.30	%
Open space - (excluding RA zoned lands and castle exclusion zone)	17.64	%
Total Open Space	25,325	m ²

The proposed layout also achieves compliance with the:

- LAP Urban Design and Place-Making Objectives, including:
 - Objective UD 1 (High Quality, Context Sensitive Design),
 - Objective UD 2 (Public Spaces and Streets),
 - Objective UD 3 (Spatial Definition and Animation),
 - Objective UD 4 (Green Network and Landscaping),
 - Objective UD 5 – (Street-Oriented Development and Responsive Frontages),
 - Objective UD 7 (Landscape Character, Values, Sensitivity and Views/Prospects);
- LAP Built Heritage & Cultural Heritage Objectives, including:
 - Objective HC 7 (Archaeological Heritage),
 - Objective HC 8 (Monuments and Places), and

- Objective HC 9 (Archaeological Assessment) which aim to ensure the protection and sympathetic enhancement of archaeological heritage in the Plan Area.

A detailed landscaping plan has been prepared by Cunnane Stratton Reynolds, as illustrated on **Drawing 18223-3-100 Landscape Master Plan**.

A detailed description of the landscaping proposals is provided in the Design Statement prepared by Simon J Kelly Architects. Notable features include:

- The creation of a distinct entrance route which is characterised by a generous road width, heavily planted with native tree species in order to create a sense of arrival and clear orientation.
- Dwellings adjacent to zoned recreational / open space have primary elevations fronting onto the proposed green spaces. These facades overlook, supervise and define the edges of streets and public landscaped areas.
- The creation of a playground amenity area as a local planning gain.
- Pedestrian routes into the development have housing units with active frontage fronting on to them which promotes passive supervision. Homezones lead from the routes which provide more intimate housing areas which incorporate soft landscaping, high quality urban design (including changes to the road surface).
- The distribution of recreational / open space is such that it is evenly distributed across the site in a contiguous fashion.
- All public realm areas will be landscaped to a high standard considering both hard and soft landscaping.
- All public realm areas are designed to be defined by facades and boundary walls, providing clarity between public and private space, whilst ensuring full passive security and a safe environment for the public, visitors, and residents.



Figure 11: Extract from Drawing 18223-3-100 Landscape Master Plan

8.3.3.2 Private Open Space

Each housing unit in the development proposal has an allocated area or private open space in accordance with the requirement set out in the *'Quality Housing for Sustainable Communities'* and Chapter 13 of the GCDP.

Table 7: Private Open Space Schedule

Type	Description	Internal Area GFA	Minimum Private Open Space Required	Minimum Private Open Space Provided
		m ²	m ²	m ²
House Type A	4 bedroom semi-detached	132	66	77 - 300
House Type B	3 bedroom semi-detached	113	57	73 - 171
House Type C	4 bedroom detached	165	83	140 - 410
House Type D	3 bedroom terrace	115	58	73 - 207
House Type E	4 bedroom semi-detached	140	70	90
House Type G	2 bedroom (4 person) duplex - ground floor	76	7	14
	2 bedroom (4 person) duplex - first / second floor	103	7	18
House Type H	2 bedroom (4 person) apartment - ground floor	97	7	12
	2 bedroom (4 person) apartment - first / second floor	111	7	12
	2 bedroom (4 person) apartment - first / second floor	103	7	12
House Type J	2 bedroom terrace	93	47	51 - 87

8.3.4 Car & Bicycle Parking

The parking provisions at the proposed development have been derived in accordance with the GCDP. The development plan requires 1.5 no. parking spaces per 1-3 bedroom houses. This relates to 2 no. spaces per house when provided on curtilage.

The development plan requires 1 no. parking space per 4 no. children for the proposed crèche. The revised building design can accommodate 58 no. children and 10 no. staff members. The number of associated car parking spaces has been increased to 25 no. spaces.

Accordingly, the minimum number of parking spaces required for the proposed development, in line with the GCDP, is 393 while the actual number of parking spaces being provided throughout the proposed development is 409.

Secure cycle parking facilities are proposed throughout the proposed development to encourage non-motorised transport to and from the site. In accordance with section 5.7.7 of the National Cycle Manual, 2 no. spaces are to be provided per terrace and duplex units. Bicycle parking provisions for detached and semi-detached shall be in their individual private open spaces. The minimum number of bicycle parking spaces required for the proposed development, in line with the National Cycle Manual is 146. The required number of parking spaces have been provided on site.

Please refer to section 4.5 and Appendix C of the **Design Statement** for further details.

8.4 Design Statement

LAP 'Objective UD 6 – Design Statements' require design statements with all large scale or sensitively located development proposals, such as in close proximity to an Architectural Conservation Area, protected structure, natural heritage designation, significant public amenity, elevated position or visually vulnerable area, and in the case of any other development proposals where this is considered necessary by the planning authority.

In accordance with LAP 'Objective UD 6', Simon J Kelly Architects have prepared a **Design Statement** for the proposed scheme which is enclosed with this consultation request. The submitted Design Statement includes a site appraisal examining the location, context, setting, accessibility, features and characteristics of the development site, which have been utilised to inform the selection of appropriate development forms and design responses and the incorporation and provision of any important landscape features in the layout and design of the development.

The **Design Statement** report includes a Statement of Compliance with Quality Housing for Sustainable Communities guidance in Appendix B, showing each dwelling, the associated house type, provided accommodation areas and minimum standards achieved.

8.5 Impact on Cultural Heritage

One recorded monument (RMP No. GA095-084), the site of a castle, is located within the proposed development site.

This castle is depicted and named 'Moneyduff Castle (Site of)' on the 1st edition OS six-inch map of 1840, the OS 25-inch map of the late 19th/early 20th century and the 1920 edition of the OS six-inch map. It was the seat of David Ballagh and Slighe Tybact in 1574 (Nolan, 1901).

It is situated on a rise near the South-East corner of the proposed development site. What remains of the castle is an overgrown (hazel, grass and moss) rectangular area, which measures c. 8m E/W, situated over 5m above the surrounding land.

An **Archaeological Impact Assessment** and **Pre-Development Testing Survey** of the proposed scheme has been completed by Richard Crumlish, B.A., M.I.A.I., Consultant Archaeologist, the results of which are enclosed in Chapter 11 and Appendix 11.1 respectively of the **Environmental Impact Assessment Report**. A **Conservation Management Plan** for the site of Moneyduff Castle, prepared by Anne Carey, Historic Buildings Consultant and Richard Crumlish, Consultant Archaeologist, is also enclosed in Appendix 11. 2 of the **Environmental Impact Assessment Report**.

Although Moneyduff Castle is depicted as 'Site of' on the OS maps, the remains of the destroyed monument are in situ on the site. The footprint of the medieval tower house may be intact, along with much of the collapsed fabric of the building. Associated features, deposits and/or artefacts may be located in the immediate vicinity. As a recorded monument Moneyduff Castle (RMP No. GA095-084) is protected under the National Monuments Acts 1930 to 2014. In terms of potential visual impact, whereas the monument is situated prominently within the surrounding landscape, very little of the actual monument is visible. As a result, any proposed development at this location will adversely impact on the monument setting rather than the actual monument.

The **Archaeological Impact Assessment** proposes the following mitigation measures which have been taken into account in the development of the proposed design:

- Prior to the commencement of any development a structured programme of pre-development testing should be carried out, by a suitably qualified archaeologist, across the proposed development site, due to its size. This will determine whether any, as yet unknown, subsurface archaeological features and/or deposits survive and if so, whether they will be adversely impacted upon by any proposed development here. The smaller field and northern end of the larger field do not require testing due to levels having been clearly reduced, through field clearance, there in the past.
- An exclusion zone of 20m should be established around the site of Moneyduff Castle (RMP No. GA095-084), within which no development shall take place. The measurement should be taken from the edge of the monument (as defined by a suitably qualified archaeologist) rather than the centre of the monument location. This buffer zone should be put in place prior to the commencement of any development, under the supervision of a suitably qualified archaeologist. The exclusion zone should not be accessible to construction plant/machinery associated with any development and should under no circumstances be used for storage of building materials during any development works.

- Due to the prominent setting of the recorded monument (RMP No. GA095-084), albeit that very little of the monument is visible, the proposed exclusion zone of 20m should help mitigate any adverse visual impact with views of the monument maintained as much as is practical within any proposed development at the site.
- Any design for a proposed housing development at this location should incorporate a long-term management plan for the monument (RMP No. GA095-084), which will maintain access to the monument, while also protecting it. Due to the hazardous situation of the monument, this should also be considered in terms of health and safety.

8.6 Impact on Biodiversity

Between 2016 and 2019, a range of specialist ecological survey work has been undertaken to provide comprehensive information on all ecological aspects of the location of the proposed development and the surrounding area. These surveys included detailed assessment of the site in terms of protected habitats and species. The studies and survey work undertaken provide a comprehensive inventory of the flora and fauna of the study area, the results of which are enclosed in Chapter 5 of the **Environmental Impact Assessment Report**.

Key findings of the 'Biodiversity' chapter include:

- The proposed development will be situated within habitats dominated by bramble and blackthorn scrub, with some ash, willow, whitebeam and alder trees becoming established across the site. Dry calcareous and neutral grassland (GS1) on thin soils was found to be interspersed throughout the areas of scrub.
- A number of fragmented and discontinuous areas of EU Annex I Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco - Brometalia*) habitat were recorded within the site. The proposal will result in the loss of 0.51 hectares of 'viable' Annex I semi-natural dry grasslands, which are classified as habitats of local importance (higher value). This equates to 5.6% of the entire area within the redline boundary. The loss of 0.51 hectares of 'viable' Annex I semi-natural dry grasslands has been replaced by the creation of an area of semi-natural grassland to the west of the site. This area comprises of 0.4 hectares of semi-natural meadow habitat and equates to approximately 4.4% of the total developable area.
- Habitats that support higher biodiversity value i.e., hedgerows and treelines will be retained where possible, predominantly along the western boundary of the site. In addition, the Landscape Master Plan for the site provides for supplementary planting of native tree and shrub species that will create and enhance hedgerows and treelines.
- Taking the above information into consideration and having regard to the precautionary principle, it is considered that the proposed development will not result in a significant loss of habitats and species of high ecological significance and will not have any significant impacts on the ecology of the wider area.
- The proposed housing development will not result in any significant residual impacts on sensitive ecological receptors. Following detailed winter bird surveys of the site and surrounding area (including Creganna Marsh SPA and Inner Galway Bay SPA), the site of the proposed development was shown to not provide suitable supporting habitat for SCI species for which nearby SPAs have been designated. In addition, no SCI species were recorded feeding or roosting within the proposed development site boundary during winter bird surveys undertaken between October and December 2018. The potential residual impacts on ecological receptors will be minor and therefore, there is no potential for the proposed development to contribute to any cumulative impacts on ecology when considered in-combination with other plans and projects.

- In the review of the projects that was undertaken, no connection, that could potentially result in additional or cumulative impacts was identified. Neither was any potential for different (new) impacts resulting from the combination of the various projects and plans in association with the proposed housing development.
- Provided that the proposed development is constructed and operated in accordance with the design, best practice and mitigation that is described within this application, significant impacts on ecology are not anticipated.

8.7 Flood Risk

Hydro-Environmental Services (HES) have undertaken a **Stage II Flood Risk Assessment (FRA)** for a proposed housing development which is provided in Chapter 7 of the **Environmental Impact Assessment Report** and its associated appendices.

The FRA is carried out in accordance with '*The Planning System and Flood Risk Management Guidelines for Planning Authorities*' (DoEHLG, 2009).

Section 5.1 and 5.2 of the **FRA** sets out a statement of compliance of the proposed scheme with the policies and objectives of the GCDP and Oranmore LAP respectively as they relate to flooding.

The FRA concludes as follows:

- A flood risk identification study was conducted to identify potential flood risks associated with the proposed residential development in Moneyduff, Co. Galway. From this study:
 - No instances of historical flooding were identified in historic OS maps;
 - No instances of recurring flooding were identified on OPW maps within the proposed site; and
 - Areas of the proposed site were identified with the PFRA and CFRAM Flood Zones as described below.
- Potential for coastal flooding is the key issue at the proposed site;
- The PFRA mapping indicates that there is a small area in the west of the proposed site located in the coastal Flood Zone A (200-year flood zone) and the coastal Flood Zone B (1000-year flood zone). The remainder of the proposed site is located in Flood Zone C – where the probability of flooding is low (less than 0.1% or 1 in 1,000);
- From the site survey conducted, there appears to be depressions in the west of the site that are prone to pluvial flooding. These depressions are earmarked for open space as opposed to residential development for the proposed project;
- The CFRAM mapping indicates that there are no areas within the site that are within the tidal Flood Zone A and B. The extent of tidal flood zones ends in the centre of the field to the west of the site;
- The site infrastructure and housing layout has been designed to ensure all highly vulnerable infrastructure are located outside the mapped PFRA flood zones. This ensures development located in mapped PFRA flood zones are limited to water compatible development *i.e.* amenity open space. The development of the site layout was interactive and was completed in line with recommendations included in '*The Planning System and Flood Risk Management – Guidelines for Planning Authorities – Technical Appendices (Nov, 2009) – Appendix B*;
- With the application of standard best practice SuDS drainage controls (soakaways) within the proposed site no downstream flooding from storm water runoff resulting from the proposed development is anticipated;

- Minimum floor levels within the proposed development are set above >5.10mOD, and for recommended floor levels this includes for tolerances in completed PFRA, CFRAM/ICPSS modelling, and predicted sea level rise due to climate change, and also includes an additional freeboard of 0.3m. This is a critical point as the development design includes a conservative tolerance for several climate change factors affecting coastal flooding in Galway, and therefore includes for predicted sea level variations over the intended lifetime of the proposed development;
- As outlined in Section 5.1 of the **FRA**, the proposed development is consistent with the relevant planning objectives and standards from the GCDP; and
- Based on the above, the overall risk of flooding posed by the proposed residential development and downstream of the site is estimated to be low.

8.8 Childcare Facility

In accordance with the ‘*Guidelines for Planning Authorities on Childcare Facilities*’ (DEHLG, 2001), the proposed scheme includes the provision of a childcare facility. The child care facility, which shares the common architectural language of the housing units is placed as a pavilion amongst the open space, in an easily accessible location in order to aid drop off and pick up. Its location adjacent to open space will allow for the children to make use of this natural environment safely.

Following a review of the Inspector’s Report relating to ABP-301952-18 in relation to the previously submitted childcare facility design, the applicant has increased the size of the proposed childcare facility from 206 sqm (as originally proposed) to 374 sqm. The revised building design can accommodate 58 no. children and 10 no. staff members. The number of associated car parking spaces has been increased from 11 no. to 25 no. spaces.

Key elements of the proposals include:

Table 8: Childcare Facility

Nature/Facilities	Nature/Facilities Provided
Nature of the facility:	Full day care
Numbers of children being catered for	58 no. children and 10 no. staff members
Parking provision for both customers and staff	The GCDP requires 1 car parking space per staff member and 1 parking space per 4 children: 25 no. car spaces provided. Cycle parking provided is in accordance with the National Cycle Manual
Proposed hours of operation	Anticipated hours 8.00am - 6.00pm
Open space provision and measures for management of same	Secured outdoor play area provided. It is anticipated the open space will be maintained by a management company.

The proposed childcare facility comprises a single storey structure with a ridge height of 4.05 metres. The external finishes are to be a mix of render and a select stone cladding. The proposed external play is enclosed by a 3-meter-high wall. Dedicated drop off car parking and bicycle parking spaces are provided adjacent to the facility.

A view of the proposed facility is provided below.



Figure 12: Front Elevation of Childcare Facility. Extracted from SJK Drawing 2325-P-026

8.9 Statement of Consistency

A Statement of Consistency in the form of a matrix of planning policies and guidance is provided in **Appendix F**.

9 CONCLUSION

This Statement of Consistency, which has been prepared by McCarthy Keville O’Sullivan (MKO), supports an application to An Bord Pleanála under the *Planning and Development Act 2000 (as amended by the Residential Tenancies Act 2016)*. The proposed development will assist Galway County Council in meeting its commitment to provide for residential development and for associated support development, which will ensure the protection of existing residential amenity and will contribute to sustainable residential neighbourhoods.

In summary, it is submitted that the proposed development results in a development which accords fully with the proper planning and development of the area while providing an attractive, high quality, contemporary development which enhances the development of Oranmore. It is submitted that the proposed scheme represents significant planning gain for the area for the following reasons:

- The assessments and associated ecological reporting have been updated to specifically address the refusal points raised in the previous application on the site (Pl. Ref. ABP-301952-18).
- The proposed development complies with Galway County Council’s zoning objectives relating to ‘R1’ and ‘OS’ zoned land.
- The proposed development provides for 212 no. residential units and provides a significant response to Galway’s housing needs in accordance with the adopted Housing Strategy 2015-2021, which has been informed by the Core Strategy of the GCDP. The scheme includes a range of house types and sizes (32.1% two-bed; 33% three-bed; and 34.9 % four-bed).
- The proposed scheme achieves a good mix and quality development that makes effective use of premium, centrally located land and contributes to a sense of place by strengthening the existing street pattern and creates new streets within the development.
- The proposed scheme includes 29.3% (25,325 sq m) of communal public open space (including the ‘OS’ zoned land) which respects the onsite Recorded Monument and is designed to incorporate both formal and informal play areas and a community gathering point.
- Pedestrian and cyclist connections are also incorporated into the design, providing an accessible street network for disabled users, walkers and cyclists. The usability of the proposed routes has been optimised by minimising gradients to usable levels and designing all areas to be compliant with relevant regulations and the Design Manual for Roads and Streets (DMURS) policy guidance document. These connections will promote permeability through the proposed development and within the wider area, encouraging walking and cycling in the locality and minimising the need to use private vehicles.
- The applicant proposes to provide the 21 no. units to fulfil their 10% Part V obligation in accordance with Section 95 of the Planning & Development Act 2000 (as amended).
- The proposed scheme includes a childcare facility with capacity for 58 no. children and 10 no. staff

We trust you find this application in order.

Appendix A

Minutes from Pre-Planning Meetings with Galway County Council

Moneyduff, Oranmore Development

SUBJECT: MEETING WITH COUNCIL PLANNERS REGARDING LINK ROAD

VENUE: Galway County Council

DATE: 25th January 2018

TIME: 2.30 pm

ATTENDANCE: Michael Timmins – Galway Co Co (MT), Valerie Loughnane – Galway Co Co (VL), Padraic Rhatigan – Arlum Ltd (PR), Paul Fitzmaurice – Arlum Ltd (PF), Gus McCarthy - MKOS (GMC).

GMC presented background to the development and outlined the relevant details regarding the access road and delivery of same. This would be carried out under phase 1 of planning ref 09/1925 as permitted under same. A “partial” commencement notice would be used.

PR outlined the history of the site and Arlum’s plans for the development of same. PR outlined the basis of the legal agreement under which Arlum have the right to construct the access road (and related services) under the existing Roykeel Planning grant. Arlum, Roykeel and Galway County Council are all party to this binding legal agreement.

PF outlined a summary of the previous meeting between Michael Lally (Tobin Engineering), Brendan Rudden (Tobin Engineering), PF and John Costello. This meeting was held on the 19th of July at 11am in County Councils Office. JC had confirmed that a TIA would not be required for the proposed Arlum development, on the basis that the access road was to be constructed under the existing planning (09/1925). JC stated that we would need to get confirmation from the planning dept. that we were permitted to develop the access road under the existing Roykeel Planning (and our associated legal agreement).

MT and VL confirmed that there is no planning issue which would prevent Roykeel / Cannons (or another party acting on their behalf) completing the access road under Phase 1 of the existing planning permission.

The planning application for the development of our site would be by way of a separate SHD application. We would need to confirm the fact that we have an entitlement to develop the road under the Roykeel/Cannon 09 application by way

of a solicitor's letter (or similar format to be agreed with Council). We would also need to confirm that we have a ROW over the road for access and services. VL confirmed that the access road should be highlighted in yellow as a ROW for the purposes of the planning application.

MT confirmed that (if necessary), we would be able to amend the specification of the road post the SHD planning grant (by agreement with the council) under the conditions of the existing planning. This would allow for any improved Road Safety Requirements to be allowed for (if required by council). The road corridor under the 09-planning grant is sufficiently wide to allow for any potential requirements.

MT confirmed that we would need to agree any changes to traffic / roads issues with Galway Co Co Roads Dept.



SHD STAGE 1: MEETING NOTE (ABP-301952-18)

Project/Reference:	170831 – SHD Stage 1 Meeting Note Arlum Ltd. (Applicant)
Time & Date:	Friday 2 nd February @11.00am
Meeting Type:	SHD Stage 1 (Planning Authority) – Meeting No. 1
Location:	Galway County Council
Minutes By:	Pamela Harty, Project Planner, MKOS
Issue Date:	02.02.2018
Filename:	SHD Stage 1 Meeting Note – 2018.02.02 -170831

Attendance Details

Individual	Company	Abbreviation
Paul Fitzmaurice	Arlum Ltd	PF
Edel Tobin – Lead Project Architect	Simon J Kelly	ET
Blair Stanaway – Project Architect	Simon J Kelly	BS
Michael Scott – Project Architect	Simon J Kelly	MS
Brendan Rudden – Project Engineer	TOBIN Consulting Engineers	BR
Pamela Harty – Project Planning Consultant	MKO	PH
Martina Connaughton - Senior Executive Engineer, Water Services	Galway County Council	MC
Fintan Donnelly - Environmental Technician	Galway County Council	FD
Kevin Finn – Housing Officer	Galway County Council	KF
James Russell – Senior Executive Planning Officer	Galway County Council	JR
Saoirse Kennedy – Senior Planner	Galway County Council	SK
John Costello – Roads Engineer	Galway County Council	JC
Ann Dolan – Senior Executive Technician	Galway County Council	AD

Abbreviations

AA	Appropriate Assessment	GFA	Gross Floor Area
AIA	Archaeology Impact Assessment	SHD	Strategic Housing Development
GCDP	Galway County Development Plan 2015-2021	SoC	Statement of Consistency
FRA	Flood Risk Assessment	RSA	Road Safety Audit
GCC	Galway County Council	TIA	Traffic Impact Assessment

1.0 Introductions and Background

Following roundtable introductions, PH outlined the structure of the presentation, as per the agenda.

2.0 Site Location and Development Description

PH provided a brief overview of the proposed site location which is located in the townland of Moneyduff, located in the suburbs of Oranmore Co. Galway. The subject lands are located to the south of a well-established residential area. The lands comprise a number of existing agricultural fields, with direct frontage onto both the Maree Road and Orancourt Road.

Notable site constraints include:

- The subject lands contain a recorded monument GA095-084 (Castle-unclassified).
- The Galway Bay Complex Special Area of Conservation (SAC) and Proposed National Heritage Area (pNHA) (site code 000268) is located immediately west of the proposed site.
- Part of the western portion of the site (zoned for 'Open Space/ Recreation and Amenity) is located within an 'Indicative Flood Zone A' as identified in the Oranmore Local Area Plan 2012-2022, which is classified as having a 'High' probability for flooding. The remainder of the site (which is zoned for residential development) is designated as Flood Zone C, where the probability of flooding from rivers and the sea is low (less than 0.1% or 1 in 1000 for both river and coastal flooding).

BS and ET provided an overview of the proposed scheme, including a description of the site layout, proposed house types, landscaping proposals, area schedules and key planning statistics (including plot ratio and communal open space provision).

BR provided an overview of the proposed civil engineering and access/traffic proposals, which included direct access to the permitted north-south link road for 10 no. dwelling units.

3.0 Feedback from Galway City Council

3.1 Planning Authority

JR welcomed the proposal and noted the high quality of the proposed built development, including the satisfactory mix of housing units. Given the scale of the development and the proximity to the SAC, JR advised that a Stage 2 AA be prepared.

3.2 Access

JC noted that a Traffic Impact Assessment and Road Safety Audit has been completed for the link road permitted under Ref 09/1925; ABP Reference PL 07.237219 which was later extended under PL Ref 15/1334. JC was concerned with the direct access for the 10 no. dwelling units as this would not have been assessed under the in the 2009 planning application for the adjacent lands. JC advised if the proposal includes direct access for the 10. individual dwelling units, he would be required to assess this aspect of the link road again under the current application. JC noted that DMURS does not promote direct access onto Distributor Roads. JC confirmed that if the proposal does not include direct access to the permitted link road for individual houses, then a Traffic Impact Assessment is not required.

JC also raised concern that the location of the proposed Part V units may pose sightline issues. JC advised that a Road Safety Audit will be required if the developer intends for the local authority to take the development in charge. PF confirmed that the a

management company will be established to manage the site rather than having it taken in charge.

3.3 Part V

KV is concerned about the distribution of Part V units and would like to see the proposed units dispersed with access to communal open space. Currently the Housing Authority's demand in Oranmore equates to 75% two-beds and 25% three beds.

3.4 Environmental

AD advised that if the site levels are going to be raised the applicant needs to apply for a permit for the fill material. Surface water management proposal will be required to be addressed. All stormwater generated on site from roadways and roofs will be required to be discharged via Oil/Petrol Interceptors.

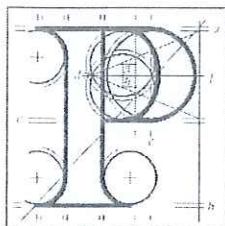
BR confirmed that a Pre-Connection Enquiry has been lodged with Irish Water.

4.0 Conclusion

JR concluded the meeting by reiterating that GCC welcomed the proposal which is in accordance with GCDP Core Strategy and complimented the architectural approach.

Key matters to revisit/address are:

- Direct access for individual houses to the permitted link road;
- Requirement for a Natura Impact Statement;
- Distribution of Part V units; and
- Compliance with DMURS.



An
Bord
Pleanála

Record of Meeting ABP-301193-18

Case Reference / Description	192 no. residential units, crèche, new site access from the North-South Distributor Road and all associated site works. Moneyduff, Oranmore, Co. Galway.		
Case Type	Section 5 Pre-Application Consultation Request		
1st/2nd/3rd Meeting	1 st Meeting		
Date:	24 th April, 2018	Start Time	11.30 am
Location	Galway County Council Offices	End Time	12.50 pm
Chairperson	Tom Rabbette	Executive Officer	Cora Cunningham

Representing An Bord Pleanála:

Tom Rabbette, Assistant Director of Planning
Stephen O'Sullivan, Senior Planning Inspector
Cora Cunningham, Executive Officer

Representing Prospective Applicant:

Padraic Rhatigan, Applicant
Paul Fitzmaurice, Applicant
Gus McCarthy, MKO Planning & Environmental Consultants
Pamela Harty, MKO Planning & Environmental Consultants
Edel Tobin, Simon J Kelly Architects
Blair Stanaway, Simon J Kelly Architects
Keith Mitchell, CSR Landscape
Brendan Rudden, Tobin Consulting Engineers

Representing Planning Authority

Eileen Ruane, Director of Services
James Russell, A/Senior Executive Planner
Kevin Finn, Senior Executive Engineer
Ronan Mannion, Executive Engineer
Tom Doherty, Executive Engineer
Maire Ni Chionna, Senior Engineer
Daithi Flood, Executive Engineer
Paula Connaghton, Assistant Planner

Introduction

The representatives of An Bord Pleanála (ABP) welcomed the prospective applicant, Planning Authority (PA) and introductions were made. The procedural matters relating to the meeting were as follows:

- The written record will be placed on the pre-application consultation file and will be made public, along with that file, should an application arise following the conclusion of this consultation process,
- ABP received a submission from the PA on 11th April, 2018 providing the records of consultations held pursuant to section 247 and its written opinion of considerations related to proper planning and sustainable development that may have a bearing on ABP's decision,
- The consultation meeting will not involve a merits-based assessment of the proposed development,
- The meeting will focus on key site-specific issues at strategic overview level, and whether the documents submitted require further consideration and/or amendment in order to constitute a reasonable basis for an application.
- Key considerations will be examined in the context of the statutory development plan for the area and section 28 Ministerial Guidelines where relevant,
- A reminder that neither the holding of a consultation or the forming of an opinion shall prejudice ABP or the PA concerned in relation to any other of their respective functions under the Planning Acts or any other enactments and cannot be relied upon in the formal planning process or in legal proceedings.

The ABP representatives acknowledged the letter dated 16th March, 2018 formally requesting pre-application consultations with ABP. Prospective applicant advised of the need to comply with definition of SHD as set out in the Act of 2016, in relation to thresholds of development. It was also noted that the Inspector dealing with the pre-application consultation request would be different to who would deal with the application when it was submitted. Recording of the meeting is prohibited.

Agenda

1. The integration of the proposed development with the urban structure of Oranmore, in particular the provision of road access for the proposed housing in accordance with the applicable standards in DMURS, including access for pedestrians as well as vehicular traffic, and the provision of a permeable urban form which facilitate links to the town centre and neighbouring residential areas including the road at Coill Clocha to the north and a pedestrian link towards the Maree Road via Orancourt
 2. The rationale for the number and type of houses proposed, having regard to national policy on residential density in urban areas and the provision of a suitable mix of housing types to meet the needs of the community
 3. The layout of the proposed housing development having regard to the need to provide a high standard of urban design and residential amenity that respects the context of the site
 4. Impact on natural Heritage and Ecology
 5. Impact on cultural heritage and archaeology
 6. Proposals for compliance with Part V of the planning act and the phasing of development
 7. Foul and surface water drainage, including connection the public sewerage, pumping on site, capacity at the WWTP; SUDS measures; water supply
 8. Any other matters
-
1. The integration of the proposed development with the urban structure of Oranmore, in particular the provision of road access for the proposed housing in accordance with the applicable standards in DMURS, including access for pedestrians as well as vehicular traffic, and the provision of a permeable urban form which facilitate links to the town centre and neighbouring residential areas including the road at Coill Clocha to the north and a pedestrian link towards the Maree Road via Orancourt

ABP sought further elaboration/discussion on:

- Providing proper and timely access to site for pedestrians/cyclists and vehicular traffic
- Relying on the partial implementation of 2010 planning permission through the extension of time application, how this proposal would relate to current standards under DMURS
- The continuation of the distributor road, which is an objective of the LAP, as part of the proposed application,
- Clarification of the above issues

Prospective Applicant's response:

- Permitted development on adjoining site not yet developed, there was binding agreement already in place when site was acquired by prospective applicant to allow development on the site to use the authorised road network and to actually install it if it had not been completed. The road works on the adjoining land would need to be completed before housing on this site was occupied.
- The roads covered by the agreement would run north / south to Coill Clocha and Oranhill, as well as one running east to the roundabout on the N67

- Adjoining developments not yet taken in charge
- Footpath to be provided to south western corner of the site opposite Orancourt but the adjoining road is not taken in charge, does not have a footpath on the near side and the verge there remains in 3rd party ownership
- Duplex units have been moved in from boundary in order to avoid restricting visibility on the authorised distributor road, the design of which does not constrain traffic speeds

Planning Authority's comments:

- Satisfied with proposals

Further ABP comments:

- Proposals for frontage development and additional accesses on distributor road should be considered
- Issues arising if prospective applicant completes road network but adjacent proposed development is not delivered before their permission expires
- Right of way to be shown and evidence of entitlement to build roads outside the site should be included in application documentation

2. The rationale for the number and type of houses proposed, having regard to national policy on residential density in urban areas and the provision of a suitable mix of housing types to meet the needs of the community

ABP sought further elaboration/discussion on:

- Justification required for proposed density in relation to Oranmore and the wider area having regard to the National Planning Framework, the sustainable urban residential guidelines and the new apartment guidelines

Prospective Applicant's response:

- Constraints on development relating to access, existing and authorised housing on neighbouring land, the proximity of a recorded monument and an SAC, and the zoning of part of the site for open space, all of which limit the amount of housing that could be provided

Planning Authority's comments:

- Proposed 2 bed acceptable for Part V
- No particular PA policy in relation to house types, smaller units will create a higher density
- Demographic profile of Oranmore consists mainly of families

Further ABP comments:

- Oranmore envisaged to grow beyond small town classification under the current development plan, proposals should have regard to national policy and its relationship with the Galway Metropolitan Area
- The extent of the recorded monument, the open space zoning and the SAC would inform the calculation of the net density of the development
- Should have regard to other ABP strategic housing decision which refused permission in relation to density and mix as they did not meet national policy

3. The layout of the proposed housing development having regard to the need to provide a high standard of urban design and residential amenity that respects the context of the site

ABP sought further elaboration/discussion on:

- Addressing the boundaries of the site, including the distributor road to the east and the SAC to the west
- Treatment of plot boundaries where they adjoin footpaths and streets
- Open space in front of terraced houses to north of site
- Landscaping along the boundary with SAC

Prospective Applicant's response:

- Constraints on site, proposed development broken into clusters to introduce character areas
- Internal streets are DMURS compliant, including shared surfaces in home zones
- Specific house type proposed for many corner plots to minimise blank walls along streets
- Open space distributed across site but visually connected to SAC, overlooked by houses
- Terraces are to contain home zone/shared surfaces with parkland in centre
- Drystone wall boundary along SAC to be retained, ownership extends into SAC, open parkland to create views from proposed development into SAC, expert recommendations for areas closest to SAC and monument reflected in landscaping proposals

Planning Authority's comments:

- Considered the proposal to be of high design quality
- Pockets served by public open space to provide vista to SAC

Further ABP comments:

- High standard of boundary and surface treatments needed to provide safe and attractive home zone areas

4. Impact on natural Heritage and Ecology

ABP sought further elaboration/discussion on:

- Proposed development beside SAC

Prospective Applicant's response:

- Botanical assessment carried out in summer 2016 in line with objective of LAP,
- NIS includes drainage proposals

Further ABP comments:

- Integrated assessment of likely impact on SAC to address issues arising from surface water and foul drainage proposals, in particular those arising from the proposed soakaways and pumping station

5. Impact on cultural heritage and archaeology

ABP sought further elaboration/discussion on:

- Cultural heritage and archaeology on site

Prospective Applicant's response:

- 20m buffer zone proposed around monument
- Licence to carry out trench testing has been obtained, the results of which are to be included in application along with appropriate mitigation measures

Planning Authority's comments:

- Have regard to health and safety issues for open space around monument

Further ABP comments:

- Potential impact of groundworks adjacent to monument to be included in assessment
- National Monuments Service has been notified of proposed development, any response will be considered in opinion and can be sent to the prospective applicant

6. Proposals for compliance with Part V of the planning act and the phasing of development

ABP sought further elaboration/discussion on:

- Part V proposals

Planning Authority's comments:

- Initial concerns raised in section 247 meetings now addressed

7. Foul and surface water drainage, including connection the public sewerage, pumping on site, capacity at the WWTP; SUDS measures; water supply

ABP sought further elaboration/discussion on:

- Issues raised in Irish Water letter
- Soakaways in relation to SAC, possible failure of proposed pumping station in relation to SAC, whether these would be taken in charge

Prospective Applicant's response:

- Ongoing discussions with Irish Water in relation to the proposed design
- Foul water going with gravity of site, then pumped from station on the site to nearest Irish Water manhole on the public road
- Water supply taken from the mains on the public road
- Substantial amount of piping required
- 4 soakways proposed in the 4 main home zones to deal with storm water
- Envisaged management company will take drainage infrastructure in charge

Planning Authority's comments:

- Potential impact on SAC
- Agree with prospective applicant that management company take in charge

Further ABP comments:

- Have regard to circular and apartment guidelines regarding management companies and taking in charge
- Application to have regard to any works being carried out to foul sewer, pipe connections if part of proposed development, include in redline, any consents required to be in place, ensure no conflict in drawings

8. Any other matters

The representatives of ABP noted the size of the site as currently delineated and the possibility that it might be increased to accommodate necessary supporting roads and piped infrastructure, as well as the sensitivity arising from the proximity of an SAC and recorded monument to the proposed housing and its prominence in the landscape. The prospective applicants were therefore advised to be mindful of the thresholds for EIA and the criteria used to determine whether sub-threshold development requires EIA.

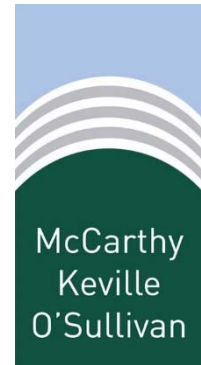
Conclusions

The representatives of ABP emphasised the following:

- There should be no delay in making the planning application once the public notice has been published
- Sample notices, application form and procedures are available on the ABP website
- Irish Water would like prospective applicants to contact Irish Water at cdsdesignqa@water.ie **between the Pre-Application Consultation and Application stages**, to confirm details of their proposed development and their proposed design.
- The email address to which applicants should send their **applications** to Irish Water as a prescribed body is spatialplanning@water.ie



Tom Rabbette
Assistant Director of Planning
qr May, 2018



SHD STAGE 1: MEETING NOTE (REVISED APPLICATION)

Project/Reference:	181044 – SHD Stage 1 Meeting Note Arlum Ltd. (Applicant): Revised Application
Time & Date:	18 th October 2018
Meeting Type:	SHD Stage 1 (Planning Authority) – Meeting No. 2 (Revised Application)
Location:	Galway County Council
Minutes By:	Pamela Harty, Project Planner, MKOS
Issue Date:	18.10.2018
Filename:	SHD Stage 1 Meeting Note – 2018.10.18 -181044

Attendance Details

Individual	Company	Abbreviation
Paul Fitzmaurice	Arlum Ltd	PF
Pamela Harty – Project Planning Consultant	MKO	PH
Gus McCarthy – Director - Project Planning Consultant	MKO	GMcC
Pat Roberts - Senior Ecologist	MKO	PR
James Russell – Senior Executive Planning Officer	Galway County Council	JR
Eileen Ruane – Director of Services – Planning	Galway County Council	ER

Abbreviations

AA	Appropriate Assessment	NIS	Natura Impact Statement
SAC	Special Area of Conservation	SPA	Special Protection Area

Following review of the decision to refuse planning permission for ABP-301952-18, the applicant and design team devised a strategy for addressing the 2 no. reasons for refusal.

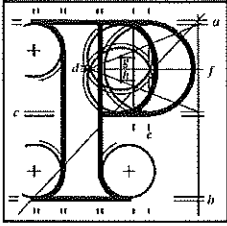
A stage 1 SHD meeting was held with Galway County Council where the project ecologist outlined the methodology for addressing the reasons for refusal, a summary of which is provided below:

- Following consideration of the refusal of the previous SHD application on this site (PL.Ref:ABP-301952), the current application features a number of changes and presents additional information with the aim of addressing the two refusal reasons stated in the previous application.
- Firstly, with respect to refusal reason one in the previous application, the current Article 6(3) Screening report screens in the potential for the proposed development to result in significant effects on both Cregganna Marsh SPA and Rahasane Turlough SPA. These sites were Screened out in the previous application. This follows an extremely precautionary principle. In order to provide additional evidence that the site and the surrounding area do not provide significant habitat for Greenland white fronted goose (or any other wildfowl species), monthly bird surveys are currently being undertaken from October 2018 to March

2019 (a full winter season). These surveys have been completed up to December 2018 and the results have been included in the NIS that is now being submitted to An Bord Pleanála. There have been no records of the SCI species from either Cregganna Marsh SPA or Rahasane Turlough SPA (Greenland white fronted goose) either on the site or in the surrounding area during the surveys undertaken so far. Neither has there been any usage of the site or adjacent fen area by any other wildfowl species. The purpose of the monthly winter bird surveys to demonstrate beyond reasonable scientific doubt, that the site of the proposed development and areas immediately surrounding it do not provide suitable habitat and are not used by Greenland White Fronted Goose. This will also demonstrate that the site and surrounding fen is not significantly used by any of the bird species that are among the qualifying interests of the Inner Galway Bay SPA either and that no adverse effects on any of these designated sites are predicted.

The results of the surveys will be used to inform the NIS, which has been updated accordingly in the current draft and will be further updated following completion of the surveys in March 2019.

- In respect of refusal reason 2, additional monthly bird surveys will provide the information necessary to conclusively demonstrate that the proposed development itself will not result in effects on the SCI species of the Inner Galway Bay SPA, Cregganna Marsh SPA or the Rahasane Turlough SPA. As described above, these surveys will be undertaken throughout the entire winter period and will be completed in March 2018, with the NIS will be updated accordingly. The revised draft NIS also includes an assessment of the potential effects of the proposed development on the nearby European Designated Sites as a result of disturbance, recreational pressures and population increase. Whilst the potential effects on the Fen habitats were assessed in the previous application, a further, specific and dedicated assessment of the adjacent alkaline fen habitat has been undertaken and is included as an appendix to the NIS and EIAR. Effects on this habitat within the SAC are fully considered in the current draft NIS.
- The assessments and associated ecological reporting will be updated to specifically address the refusal points raised in the previous application on the site (Pl.Ref. ABP-301952-18).



An
Bord
Pleanála

Record of Meeting ABP-303294-18

Case Description	212 no. residential units (156 houses and 56 apartments), a creche and all associated site development works. Moneyduff, Oranmore, Galway.		
Case Type	Section 5 Pre-Application Consultation Request		
1st Meeting	1 st Meeting		
Date:	8 th February, 2019	Start Time	11:30 a.m.
Location	Offices of Galway County Council	End Time	13:20 p.m.
Chairperson	Tom Rabbette	Executive Officer	Ciaran Hand

Representing An Bord Pleanála:

Tom Rabbette, Assistant Director of Planning
Stephen Rhys Thomas, Planning Inspector
Ciaran Hand, Executive Officer

Representing Prospective Applicant:

Paul Fitzmaurice, Applicant representative
Blair Stanaway, Architect
Brendan Rudden, Engineer
David McNicholas, Ecologist
Pamela Harty, Planner
Pat Roberts, Ecologist

Representing Planning Authority

Valerie Loughnane, Senior Planner
Eileen Keaveney, Administrative Officer
Kevin Finn, Acting Senior Executive Engineer
Daithi Flood, Assistant Engineer

Introduction

The representatives of An Bord Pleanála (ABP) welcomed the prospective applicant, Planning Authority (PA) and introductions were made. The procedural matters relating to the meeting were as follows:

- The written record will be placed on the pre-application consultation file and will be made public, along with that file, should an application arise following the conclusion of this consultation process,
- ABP received a submission from the PA on 24th January 2019 providing the records of consultations held pursuant to section 247 and its written opinion of considerations related to proper planning and sustainable development that may have a bearing on ABP's decision,
- The consultation meeting will not involve a merits-based assessment of the proposed development,
- The meeting will focus on key site-specific issues at strategic overview level, and whether the documents submitted require further consideration and/or amendment in order to constitute a reasonable basis for an application.
- Key considerations will be examined in the context of the statutory development plan for the area and section 28 Ministerial Guidelines where relevant,
- A reminder that neither the holding of a consultation or the forming of an opinion shall prejudice ABP or the PA concerned in relation to any other of their respective functions under the Planning Acts or any other enactments and cannot be relied upon in the formal planning process or in legal proceedings.

The ABP representatives acknowledged the letter dated 20th December 2018 formally requesting pre-application consultations with ABP. Prospective applicant advised of the need to comply with definition of SHD as set out in the Act of 2016, in relation to thresholds of development. It was also noted that the Inspector dealing with the pre-application consultation request would be different to who would deal with the application when it was submitted. Recording of the meeting is prohibited.

Agenda

- 1. Natural Heritage and Ecology. NIS and EIAR.**
- 2. Archaeological and Cultural Heritage.**
- 3. Pedestrian permeability and DMURS.**
- 4. Any other matters.**

NOTE:

At the commencement of the meeting, correspondence from the Development Applications Unit of the Department of Culture, Heritage and the Gaeltacht, in relation to Nature Conservation was referred to by representatives of the Board. The correspondence had not been forwarded to the prospective applicant and the meeting was adjourned for a short period to allow time for its contents to be read.

1. Natural Heritage and Ecology. NIS and EIAR.

ABP sought further elaboration/discussion on:

- National Parks and Wildlife Service submission on this proposed development and the contents of the NIS generally.

Prospective Applicant's response:

- This proposed development is outside of the SAC boundary and is not encroaching
- Mitigation measures have been included to manage potential run off during the construction phase
- Flood risk will be examined and addressed in the NIS at application stage
- There has been an increase in the human population of the wider area and no residential developments are linked to Cregganna Marsh
- A landscaping buffer will be provided to the adjacent SAC
- There is no evidence to show an ancillary feeding area in the SAC
- There are no open water or mud flats east of the public road
- A full winters worth of survey data will address what bird species utilise the SAC (if any)
- An otter survey will also be submitted
- The SPA is 200 meters in proximity from the site, a permitted development of 400 houses and a wide public road form a barrier to Cregganna Marsh
- It will be demonstrated that the SPA is not being used for geese, the site cover is scrub and not a wetland, the SPA also contains dense rushes and reeds
- No birds of note are located in the adjacent area of the SAC
- Annex 1 Habitat is not being lost
- The concerns outlined in the National Parks and Wildlife Service submission will be addressed

Planning Authority's comments:

- Examine the SEA of 2012 Oranmore LAP
- There was flooding in Galway in 2015
- Prove that there is no flood impact
- Meet all of the objectives of the LAP
- Use information and data to back up statements
- Address all concerns contained in the National Parks and Wildlife Service submission

Further ABP comments:

- Ensure all concerns contained in the National Parks and Wildlife Service submission are addressed
- Examine if there are any in-combination effects with other existing and permitted developments, as necessary
- Use scientific data and analysis to support your bird survey
- Clarify if any impact from leisure use such as cyclists and dog walkers will result to the SAC
- Ensure that all conclusions are beyond reasonable scientific doubt

- Address hydraulic connections, habitats and species impact and cumulative impact
- Highlight if there is any human impact
- Ensure that the EIAR ties in with the NIS regarding baseline data

2. Archaeological and Cultural Heritage.

ABP sought further elaboration/discussion on:

- Archaeological and Cultural Heritage in the context of the Development Applications Unit submission
- Visual amenity of the Castle a Recorded Monument (GA095-084)

Prospective Applicant's response:

- Satisfied with the DAU submission
- Mitigation measures will be taken and the buffer area of 20 meters can happen
- Happy with the proposed conditions in the event of the application being granted
- In considering the Castle the landscaping plan is sensitive
- The buffer area around the Castle is sensitively managed
- It can be addressed how certain areas might be taken in charge
- A management company would be used

Planning Authority's comments:

- No issues with management of the buffer area around the Castle

Further ABP comments:

- Address concerns raised in the Development Applications Unit submission
- Clarify if open space around the castle remains are to be taken in charge

3. Pedestrian permeability and DMURS.

ABP sought further elaboration/discussion on:

- The distributor road in connection with other developments
- DMURS context
- The permitted roundabout provides an ideal solution for vehicles but what proposals are there with regards to pedestrians and cyclists

Prospective Applicant's response:

- Permeability increases from Oranmore to the town centre
- There is an existing permission on the adjacent site
- An agreement is in place with another landowner to construct a road which will be pedestrian and cyclist friendly
- There is a marginal adjustment required for lanes at the roundabout
- Pre-development submissions have been lodged, conditions have been met and commencement notices have been issued
- There is a discharging condition
- There is a pathway on 3rd party land which is not taken in charge

Planning Authority's comments:

- In 2015 there was a previous road permission this was prior DMURS
- A condition included that requires agreement on a phased basis
- Phase 1 is the roads process
- The roundabout will have minor amendments which will comply with DMURS and the cycle strategy without changing the road
- The long-term plan is to have a road to N18
- Roads in the area are not taken in charge

Further ABP comments:

- Address all conditions outlined at application stage
- Provide a detailed DMURS design statement
- Pedestrian connections require greater detail

4. Any other matters

ABP comments:

- Have regard to the recent planning history of this site
- Have regard to the new EIAR regulations

Prospective Applicant's response:

- Creche spaces have been increased on foot of comments in the Inspector's Report

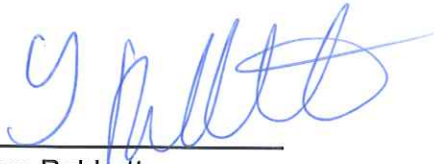
Planning Authority's comments:

- Further discussions can take place with the prospective applicant regarding any outstanding issues

Conclusions

The representatives of ABP emphasised the following:

- There should be no delay in making the planning application once the public notice has been published
- Sample notices, application form and procedures are available on the ABP website
- Irish Water would like prospective applicants to contact Irish Water at cdsdesignqa@water.ie **between the Pre-Application Consultation and Application stages**, to confirm details of their proposed development and their proposed design.
- The email address to which applicants should send their **applications** to Irish Water as a prescribed body is spatialplanning@water.ie



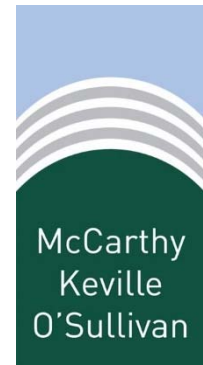
Tom Rabbette
Assistant Director of Planning
February 2019

27/02/

Planning & Environmental Consultants

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Moneenageisha Road
Galway

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MEETING MINUTES

Project/Reference:	Strategic Housing Development (SHD), Moneyduff, Oranmore (ABP-303294-18)
Time & Date:	27 th February 2019. 11:30 am
Meeting Type:	Stage 3 pre-submission consultation
Location:	NPWS office, Custom House, Galway
Minutes By:	David McNicholas
Issue Date:	27/02/2019
Filename:	181044

Attendance Details

	Individual	Company	Abbreviation
Attendees	David McNicholas	MKO	DMN
	Pat Roberts	MKO	PR
	Padraig Rhatigan	JJ Rhatigan	PRh
	Paul Fitzmaurice	JJ Rhatigan	PF
	Julie Fossitt	NPWS	JF
Apologies			

Circulation: All attendees

Item	Description
1.0	<p>Introductions</p> <p>PRh – Introduced himself and PF and explained the nature of their involvement in the project. He explained that they were interested in attending the meeting in order to gain a better understanding of the items raised in the DAU submission and how they will be addressed in the application.</p> <p>PR introduced himself and explained that the purpose of the meeting was to discuss the items raised in the submission from the Development Applications Unit of the Department of Culture, Heritage and the Gaeltacht dated the 29th January 2019 and to provide details on how they are to be addressed.</p> <p>JF queried aspects of EIA scoping via ABP, including whether ABP had observations on scope of EIA and was aware of the meeting with NPWS, in this SHD pre-application case. JF also queried whether minutes would be produced and supplied to ABP. It was confirmed that agreed minutes would be supplied to ABP.</p> <p>JF noted that the proposal was similar to or the same as the previous application, and asked if any other (third party) submissions had been made in relation to that case, noting that details of submissions are not normally known or publicly available in ABP/SHD cases.</p>

	<p>It was confirmed by PF that the only other submissions in relation to the project were from local residents and did not specifically relate to issues surrounding natural heritage. They were predominantly restricted to issues over traffic, roads and pedestrian crossings.</p> <p>JF noted that although the meeting was to focus on the DAU submission dated 29/01/2019, items raised in previous submissions in relation to the previous application (ABP – 301952 – 18) continue to stand and need to be addressed.</p>
2.0	<p>Consideration of potential disturbance to the Qualifying Interest (QI) or Special Conservation Interests (SCI) species of nearby Special Areas of Conservation (SACs)/Special Protection Areas (SPAs):</p> <p>PR explained that issues relating to disturbance and habitat loss and degradation had been addressed in the application and through further survey works including the following:</p> <ul style="list-style-type: none"> • Monthly bird surveys have been undertaken of the site and nearest parts of the Inner Galway Bay SPA as well as Creganna Marsh SPA throughout the winter of 2018/2019 and are ongoing. These surveys follow an adapted I-WeBS survey methodology. • The site of the proposed development and its immediate surroundings including the adjacent fen do not provide suitable habitat for Qualifying Interest (QI) or Special Conservation Interests (SCI) species for which the nearby Galway Bay Complex SAC, Creganna Marsh SPA or Inner Galway Bay SPA have been designated. • No SCI bird species have been recorded within the site during dedicated bird surveys that have been undertaken between October 2018 and February 2019. No evidence of the site of the proposed development being on any commuting route was recorded. • There is a physical and visual barrier between the proposed development site and Creganna Marsh in the form of existing housing estates. • Dedicated otter surveys have been undertaken both on the site and in the surrounding area with no suitable habitat present on the site and no signs of otter activity recorded in the wider area. • The proposal will not result in any physical loss of habitat for QI/SCI species. • The applicant is developing within lands that have been zoned for development within the Oranmore Local Area Plan 2012 and the County Development Plan, which have been subject to the Appropriate Assessment process (CAAS, 2015)¹. <p>Following these surveys, it is further demonstrated that the site of the proposed development and surrounding lands do not provide significant habitat for QI/SCI species of the nearby SACs/SPAs and that the proposed development will not result in any adverse effects in relation to disturbance of these species. The data obtained from these surveys</p>

¹ CAAS, 2015, Natura Impact Report In Support of the AA of the Galway County Development Plan 2015-2021, Online, Available at: <http://www.galway.ie/en/services/planning/developmentplansandpolicy/galwaycountydevelopmentplan2015-2021/environmentalsupportingdocuments/>, Accessed: 01/03/2019

	<p>will be presented in the Natura Impact Statement (NIS) and Environmental Impact Assessment Report (EIAR) presented with the Stage 3 SHD application.</p> <p>In addition, PR explained that a review of all developments in the area surrounding the proposed development since 1994 (when the Inner Galway Bay SPA was designated) has been undertaken and will inform the final cumulative assessment in the EIAR Biodiversity Chapter and NIS. PR confirmed that none of the developments reviewed had encroached onto any designated site. He also confirmed that although, the site of the proposed development was surrounded by existing, proposed and recently constructed developments, no evidence that there was a commuting route for any species through the site was recorded during any of the surveys undertaken. Neither was there any continuity of habitats through the site (i.e. the fen that is within the SAC does not continue through the site of the proposed development and it does not provide a significant link to sensitive habitats in the wider area).</p> <p>JF noted the above in relation to direct and indirect effects on birds in the application area but advised that the NIS needed to focus on matters of relevance, and the European sites and conservation objectives that were realistically at risk from construction and operation of the development, including any ex-situ and cumulative effects or pressures that might result, e.g. increased disturbance and amenity and recreational pressures, pressures on water and wastewater services, road infrastructure and other facilities etc. resulting from increased housing, population and development in the wider Oranmore area. JF said the definition of NIS should be checked as the NIS is required to include scientific examination of evidence and data necessary to identify and classify and implications for conservation objectives of sites, and noted that these are broader than QIs or SCIs alone. JF said the key concerns in relation to potential effects on European sites were outlined in the Department's latest submission and advised that these needed to be addressed in the NIS. She referenced the standards of the AA process that would have to be reached on the basis of the NIS submitted. JF mentioned Scottish Natural Heritage (SNH) guidelines in relation to addressing recreational pressures on SACs/SPAs.</p> <p>PR said that the proposed development did not provide any direct or indirect access to any SAC or SPA and that the development was located on zoned land and fully in accordance with the provisions of the Oranmore Local Area Plan 2012, Galway County Development Plan 2015-2021 and its Core Strategy. These plans were the subject of Appropriate Assessment in their own right (CAAS, 2015 - *note consultants prepare reports, AA competent authorities carry out AA).</p> <p>PR stated that he was not aware of the Scottish Natural Heritage Guidance that was referenced by JF but will use it in the completion of an assessment of the ex-situ impacts on SACs/SPAs as a result of recreational activity.</p> <p>PF added that the proposal is required to have 15% of the developable areas as amenity and recreational areas and that the proposal has been designed to have this, including an additional 14.3% of open space. This provides adequate provision for recreation and amenity within the site, without impacting on the surrounding SAC/SPA.</p>
3.0	<p>Consideration of potential Hydrological and Hydrogeological effects on nearby SACs/SPAs</p> <p>JF said that the NIS should contain all scientific information relating to how the effects were analysed and assessed, including cumulative effects on groundwater dependent receptors in the SAC. She explained that if key potential effects were hydrological/hydrogeological effects on fen habitats (including an assessment of their structure and function as well as the relevant conservation objectives), this should form part of the NIS.</p>

	<p>Will the development, alone or in combination with other constructed and permitted developments, affect or impede groundwater flow to/from the fen habitat in the SAC to the east, or affect fen hydrology? The attributes and targets of the site-specific conservation objectives, and the requirements of the habitat, should be checked and will guide the detail of the assessment required. These matters will guide the content of the NIS.</p> <p>PR stated that all relevant information/data from the hydrological assessment of the site on the Sustainable Drainage Design (SuDS) and the Flood Risk Assessment was considered in the assessment of the hydrological/hydrogeological impacts on the designated sites. All this information is available in the EIAR Biodiversity and Hydrology/Hydrogeology chapters and associated appendices. This information confirms that the proposed development will have no effect on downstream SAC/SPA and was cross referenced in the NIS. However, in light of the DAU submission, the NIS will be updated to include this information to provide the scientific reasoning within the document itself. The NIS will address all other issues raised in the DAU submission.</p> <p>PR agreed to update the Hydrogeological assessment to address this issue</p>
4.0	<p>Biodiversity:</p> <p>PR explained that whilst the site may have contained high quality Annex I habitats in the past, it was assessed on the basis of the habitats that currently exist on the site and that the current owner was not responsible for any previous works undertaken on the site.</p> <p>JF noted that Annex I habitats do occur on the site, as established by the various surveys, including those of MCKOS. JF noted that excavations were undertaken (in connection with archaeological investigations) on the site and may have been development which required planning permission, noting the range of restrictions on exemptions that could have applied. Various types of ground excavations and testing are classes of exempted development.</p> <p>PF – An archaeological Licence was granted from the Department following consultation. JF outlined that the granting of such a licence does not negate any planning requirements that might arise. The client not aware of any requirement for planning permission for such exploration works and was not advised by any party that such permission was required.</p> <p>PR explained that site has been the subject of detailed habitat surveys and mapping. Isolated areas of Annex I calcareous grassland were recorded on the site and have been mapped. The site is currently subject to low intensity grazing and is in the process of being engulfed by scrub and rank grassland. The area of Annex I habitat within the site is decreasing as a result of scrub encroachment and this trend is likely to continue.</p> <p>PR confirmed that the proposed development has provided for the retention and ongoing management of almost 0.71 hectare Annex I calcareous grassland within the site and forming a strip along the boundary with the SAC to the west and north. A Habitat Management Plan has been included within the application? and has defined roles and responsibilities for the implementation of the plan and monitoring of the results. The plan also provides for the enhancement of general biodiversity on the site with the retention and enhancement of hedgerows and treelines.</p> <p>PR confirmed that mammal surveys of the site have been undertaken and details are provided within the EIAR including all dedicated badger and otter surveys. Bat surveys were not required as the site does not support any suitable roosting features and is not considered to provide a significant area of suitable foraging habitat. In addition, no obvious potential for the site to be a significant commuting route was identified.</p>

	<p>JF questioned the lack of data on bats and the lack of surveys to establish usage of the site by bats, noting that PR confirmed that bats used and overflew the site. JF raised the issue of the site being a potential ecological corridor, and noted the extent of cumulative habitat loss and fragmentation in the area. JF said that bat surveys were required to establish the baseline ecological environment.</p> <p>Post meeting it has been decided to undertake nighttime bat detector surveys of the site in advance of submission.</p> <p>JF stated that there is a need to address and assess the cumulative effects that could result or which may already exist.</p> <p>PR confirmed that the proposed development has been designed to comply with the various plans and policies referenced in the DAU submission. JF advised reviewing the proposal in the context of consistency or compliance with the protective nature conservation objectives and policies in these plans, noting that these are matters for consideration in relation to proper planning and sustainable development of an area.</p> <p>JF suggested reviewing the recent EU Commission Guidelines on EIAR, in particular the checklists of the project description to ensure all items have been addressed.</p>
5.0	<p>Closing</p> <p>PR asked if there were any other issues that JF wanted to discuss.</p> <p>JF said no.</p>

END

Appendix B

Legal Agreement relating to Permitted Road Network Infrastructure –
GCC Pl Ref 09/1925 & 15/1334

Kieran Murphy & Co.

BREDA TIERNEY KEVIN McNAMARA
GEMMA FORDE

Dublin Office:
24/26 Upr. Ormond Quay
DX 4537 Galway

Solicitors
9 The Crescent, Galway
H91 W6T7

Tel. 091-587171
Fax 091-584660
Email: law@kieranmurphy.com
22nd June 2018.

Our Ref.
KMcn/CD/RHA20170034

Your Ref.

TO WHOM IT MAY CONCERN

Re: Arlum Limited
Lands at Moneyduff, Oranmore, Co. Galway.

Dear Sir/Madam,

The above Company is the registered owner of the property described in Folio 121724F County Galway. We attach hereto copy PRA Printout of the said Folio together with PRA Screenshot of the Folio Plan, both printed from landdirect.ie.

The property described in Folio 121724F County Galway has the benefit of appurtenant rights of way, wayleave and other easements, rights and privileges, allowing access and egress to and from the public road, as specified in Land Registry Instrument Numbers D2017LR138723K and D2017LR138726P, registered as appurtenant rights at Entry Nos. 1 and 2, Part 1 (A) of Folio 121724F County Galway. Subject to the provisions of the said Instruments, our client has an entitlement to construct the roads and services necessary for development of the above property.

Yours faithfully,



Kevin McNamara

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Landdirect.ie

https://www.landdirect.ie/pramap.aspx/

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Gaige Oranmore

ROCKLANDS

MONEYDUFF

Orenhill Rd

Scale 1:5000

Townland Moneyduff

Barony Dunkellin

County Galway

Property Details

> Back

Folio Number	GY121724F
Title Level	Freehold
Plan Number	17
Property Number	1
Area of selected plans	19.09 hectares.
Number of Plans on this folio:	2
Address	Not Available

[View Folio PDF](#) [Request Certified Copy](#)

The following Applications are Pending on this Folio

D2018LR021690H For Further Attention

*PRA Boundaries and Plan Area are not conclusive. See [Section 52\(2\) of Registration of Title Act 2006](#) and [Rule 8\(B\) of the Land Registration Rules 2012](#).

[Print Current View](#)

EN 11:54 07/03/2018

Land Registry

County Galway

Folio 121724F

Register of Ownership of Freehold Land

Part 1(A) - The Property

Note: Unless a note to the contrary appears, neither the description of land in the register nor its identification by reference to the Registry Map is conclusive as to boundaries or extent

No.	For parts transferred see Part 1(B) Description	Official Notes
1	<p>The property shown coloured Red as plan(s) 17, DHVY5 on the Registry Map, situate in the Townland of MONEYDUFF, in the Barony of DUNKELLIN, in the Electoral Division of CLARINBRIDGE.</p> <p>The Registration does not extend to the mines and minerals</p>	From Folio GY5620N

- 1 10-OCT-2017 D2017LR138723K There is appurtenant to the property the easement(s) as specified in Instrument D2017LR138723K over part of the townland of ORANHILL by the way shown coloured yellow on folios GY107698F, GY116107F and GY116108F of the Registry Map.
- 2 12-OCT-2017 D2017LR138726P There is appurtenant to the property the easement(s) as specified in Instrument D2017LR138726P over part of the townland of MONEYDUFF by the way shown coloured yellow on folios GY5620 and GY29395F of the Registry Map.
- Note: Entry added under Rule 7. Q2018LR000168K. 16-JAN-2018.
- Note: Entry added under Rule 7. Q2018LR001136E. 16-JAN-2018.

Land Registry

County Galway

Folio 121724F

Part 1(B) - Property

Parts Transferred

No.	Prop No:	Instrument:	Date:	Area(Hectares):	Plan:	Folio No:

Land Registry

County Galway

Folio 121724F

Part 2 - Ownership

Title ABSOLUTE

No.	The devolution of the property is subject to the provisions of Part II of the Succession Act, 1965
1	12-OCT-2017 ARLUM LIMITED (CRO reference 312486) of Wolfe Tone House, Fr Griffin Road, County Galway is full owner. D2017LR138726P

Land Registry

County Galway

Folio 121724F

Part 3 - Burdens and Notices of Burdens

No.	Particulars
1A 05-MAY-1972 Y 1707/72	The conditions relating to the use and enjoyment of the parts of the property shown coloured yellow on plan DHVY5 (O.S. 95/5) and shown edged red as plan 17 (O.S. 95/5) as specified in Instrument No. Y 1707/72 . Note : The burdens at entries 1a and 1b rank in equal priority . Note: Description revised. D2017LR138726P.
1B 05-MAY-1972 Y 1707/72	Full right and liberty for Sean Kilraine, his heirs, executors, administrators, the registered owner of the property comprised in folio GY56523, his lessees and assigns, at all times to go pass and repass over the property herein by the way shown coloured yellow on plan DHVY5 (O.S. 95/5) for the purpose specified in Instrument No. Y 1707/72 . Note : The burdens at entries 1a and 1b rank in equal priority . Note: Description revised. D2017LR138726P.
2 10-OCT-2017 D2017LR138723K	The right of way and such other easements as specified in Instrument D2017LR138723K in favour of the registered owners of the property comprised in folios GY116107F, GY116108F and GY107698F, their heirs, assigns and others as specified therein, affecting the part of the property shown coloured yellow on plan DHVY5 of the Registry Map.

Appendix C

Part V Costings and Schedule of Units

Part V Schedule - Residential Development - Moneyduff Oranmore.

Unit Type	Description	Unit Number	Nett Floor Area of Unit Type (sqm)	Total Cost
Type G	2 bed apartment	36	81	€219,281.50
Type G	2 bed apartment	38	81	€219,281.50
Type G	2 bed apartment	40	81	€219,281.50
Type D	3 bed terrace	59	115	€274,188.73
Type J	2 bed terrace	60	93	€221,736.09
Type D	3 bed terrace	61	115	€274,188.73
Type D	3 bed terrace	69	115	€274,188.73
Type J	2 bed terrace	70	93	€221,736.09
Type J	2 bed terrace	71	93	€221,736.09
Type D	3 bed terrace	72	115	€274,188.73
Type B	3 bed semi - d	120	111	€264,652.45
Type B	3 bed semi - d	121	111	€264,652.45
Type H	2 bed apartment	124	99	€268,010.38
Type G	2 bed apartment	127	81	€219,281.50
Type G	2 bed apartment	129	81	€219,281.50
Type G	2 bed apartment	131	81	€219,281.50
Type G	2 bed apartment	141	81	€219,281.50
Type G	2 bed apartment	143	81	€219,281.50
Type G	2 bed apartment	145	81	€219,281.50
Type G	2 bed apartment	147	81	€219,281.50
Type G	2 bed apartment	149	81	€219,281.50

Appendix D(1)

Pre-Commencement Conditions Compliance Submission
(ABP Ref PL 07.237219 / GCC Pl Ref P09/1925 which was extended by GCC Pl Ref 15/1334)

Fairgreen House,
Fairgreen Road,
Galway
H91 AXK8
Tel: +353 (0)91 565211
Fax: +353 (0)91 565398

Block 10-4,
Blanchardstown Corporate Park,
Dublin 15
D15 X98N
Tel: +353 (0)1 8030401/6
Fax: +353 (0)1 8030409/10

Market Square,
Castlebar,
Co. Mayo
F23 Y427
Tel: +353 (0)94 9021401
Fax: +353 (0)94 9021534

17 Bowling Green Lane,
Clerkenwell,
London, EC1R 0QB
United Kingdom
Tel: +44 (0)20 3915 6301
Email: info@tobin-uk.com

Our Ref: BR/SG 10402-02-06

25th May 2018

Planning Department,
Galway County Council,
Áras an Chontae,
Prospect Hill,
Galway.

**RE: Proposed Development at Oranhill, Oranmore, Co. Galway -
PI Ref 09/1925 (ABP Reference No 07.237219) [Extended under PI Ref 15/1334]**

Dear Sir,

We have been engaged as Consulting Engineers in order to address pre-development conditions and commencement of works for the above development. Further to recent meetings and correspondence with the Roads Department, we wish to submit the following in relation to the conditions:

Condition No. 4:

We hereby confirm that as per Condition 4, the north / south link road will be included in Phase One of the development. We also confirm that the link road to the N67 (via Rocklands roundabout) is included in Phase One as requested by the Roads Department of Galway County Council and primarily for the provision of construction traffic access (see attached Phasing Layout Drawing No. 10402-1015). The remaining phases shall be agreed with the Planning Authority on completion of Phase One as stipulated in the Condition 4.

The link road from the roundabout will serve the site for construction access to the future phases therefore avoiding the need to access the future phases through or via the existing adjoining housing estates. The north / south link road will be constructed up to the existing estate roads but not actually opened for public use until the future phases are progressed. This approach will greatly assist the health and safety of the construction site during the various construction phases.

Directors: L.E. Waldron (Chairman) R.F. Tobin (Managing Director) E. Connaughton (Company Secretary)
B.J. Downes D. Grehan M. McDonnell C. McGovern
M.F. Garrick J.P. Kelly B. Mulligan

Associate Directors: T. Cannon B. Carroll P. Cloonan B. Gallagher B. Heaney E. McPartlin A. Mulligan S. Tinnelly

Condition No. 10:

We refer to the access road to the proposed development only and following our meeting and correspondence with the Roads Department we have revised elements of this access road within the permitted corridor to achieve the current standards as requested by the Roads Department of Galway County Council (See Phase One Road Layout Drawing No. 10402-1016).

Condition No. 15:

We are currently engaging with a lighting specialist in order to address this condition and a layout will follow in the coming fortnight.

As per condition 15 and the discussions on same, this lighting scheme will be designed by a competent public lighting designer so as to meet the design and performance requirements set out in the latest edition of the European Standard EN13201-2 & BS 548G-1: 2014. The luminaires used shall be LED type only and shall be approved for use on the Triple E Register operated by Sustainable Energy Associated Ireland (SEAI). The lighting scheme shall incorporate a trimming and dimming regime to 75% of the light output between the hours 12.00 midnight and 6.00am to match Unmetered Registrar (UMR) approved burn profile.

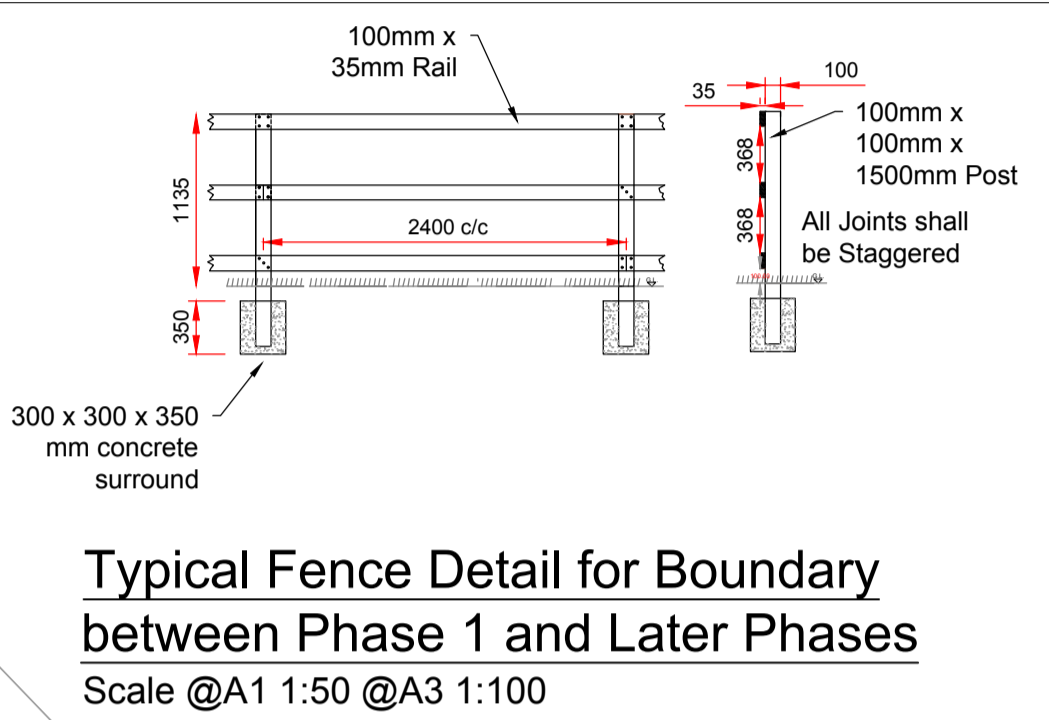
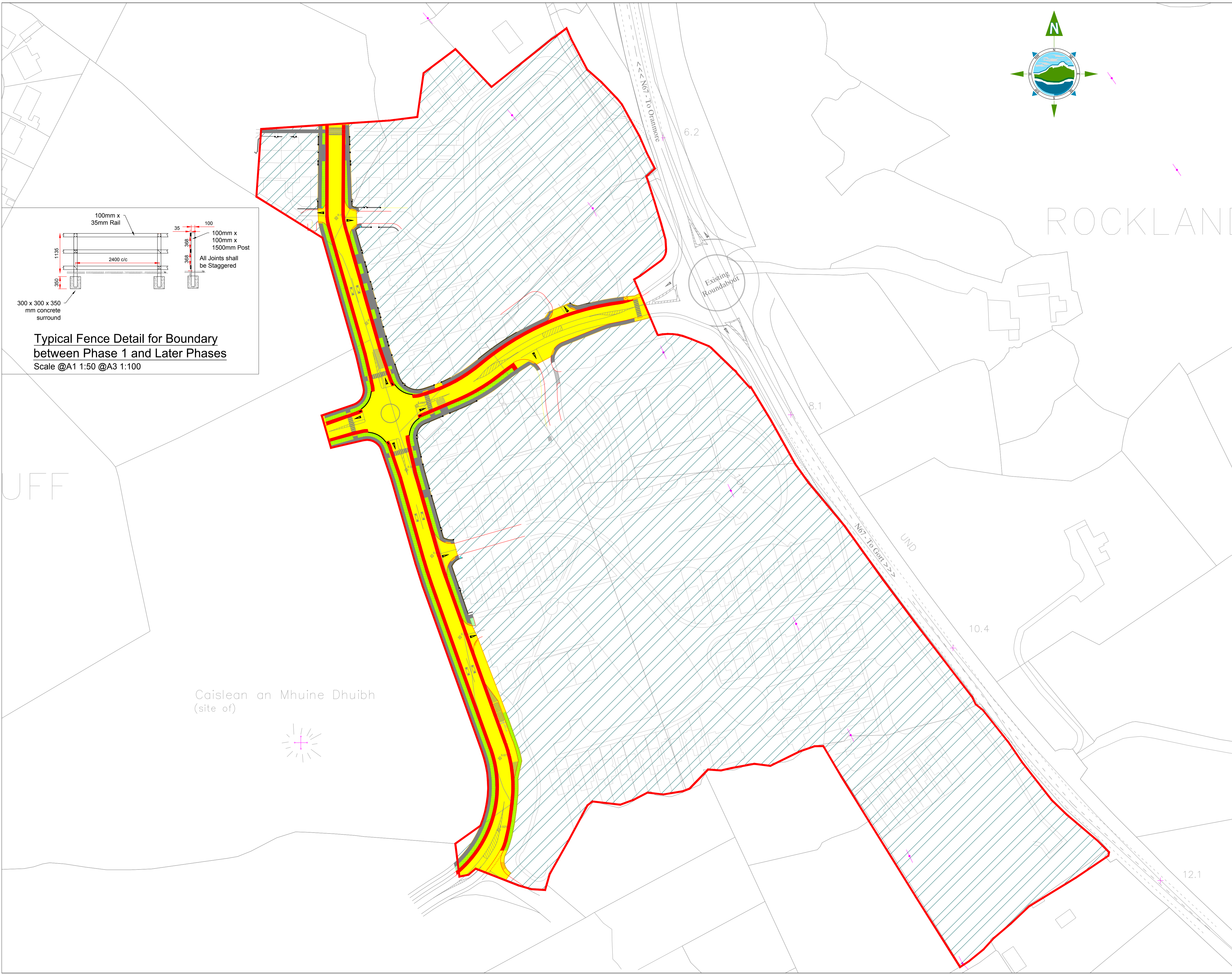
We would be very grateful if you can confirm if the above are in order and in particular if compliance could be confirmed for Conditions 4 and 10.

Should you have any queries, please do not hesitate to contact us.

Yours faithfully,



Brendan Rudden



LEGEND

- Site Boundary
- Phase 1
- Housing / Buildings Phases

- NOTES:**
1. FIGURED DIMENSIONS ONLY TO BE TAKEN FROM THIS DRAWING.
 2. ALL DRAWINGS TO BE CHECKED BY THE CONTRACTOR ON SITE
 3. ENGINEER/EMPLOYERS REPRESENTATIVE, AS APPROPRIATE, TO BE INFORMED BY THE CONTRACTOR OF ANY DISCREPANCIES BEFORE ANY WORK COMMENCES
 4. THE CONTRACTOR SHALL UNDERTAKE A THOROUGH CHECK FOR THE ACTUAL LOCATION OF ALL SERVICES/UTILITIES, ABOVE AND BELOW GROUND, BEFORE ANY WORK COMMENCES
 5. ALL LEVELS SHOWN RELATE TO ORDNANCE SURVEY DATUM AT MALIN HEAD

Rev	Date	Description	By	Chkd.
D03	25.05.2018	Issued for Comment	JK	BR
D02	25.05.2018	Issued for Comment	JK	BR
D01	21.05.2018	Issue Comment	JK	BR

Client:
ROYKEEL LTD.

Project:
**Residential Development
Oranhill, Oranmore
Co. Galway**

Title:
Proposed Phasing Layout

Scale @ A1: 1:1000 @ A3 1:2000

Prepared by: JK Checked: BR Date: May 2018

Project Director: Michael McDonnell

Drawing Status: Preliminary

TOBIN
Patrick J. Tobin & Co. Ltd.

TOBIN Consulting Engineers,
Fairgreen House, Fairgreen Road,
Galway, Ireland.
tel: +353-(0)91-565211
fax: +353-(0)91-565398
e-mail: galway@tobin.ie
www.tobin.ie

Drawing No.: **10402-1015 D03**

Revision:



LEGEND

- Site Boundary
- Proposed Footpath 2.0m Wide
- Proposed Cycling Line 1.8m Wide
- Proposed Grass Area
- Proposed Tactile Paving and Drop Kerb Location

NOTES :

1. FIGURED DIMENSIONS ONLY TO BE TAKEN FROM THIS DRAWING.
2. ALL DRAWINGS TO BE CHECKED BY THE CONTRACTOR ON SITE
3. ENGINEER/EMPLOYERS REPRESENTATIVE, AS APPROPRIATE, TO BE INFORMED BY THE CONTRACTOR OF ANY DISCREPANCIES BEFORE ANY WORK COMMENCES
4. THE CONTRACTOR SHALL UNDERTAKE A THOROUGH CHECK FOR THE ACTUAL LOCATION OF ALL SERVICES/UTILITIES, ABOVE AND BELOW GROUND, BEFORE ANY WORK COMMENCES
5. ALL LEVELS SHOWN RELATE TO ORDNANCE SURVEY DATUM AT MALIN HEAD

Rev	Date	Description	By	Chkd.
D01	21.05.2018	Issue Comment	JK	BR

Client:
ROYKEEL LTD.

Project:
**Residential Development
Oranhill, Oranmore
Co. Galway**

Title:
**Proposed Road Layout
(Phase One)**

Scale @ A1:	1:1000 @ A3 :1:2000	
Prepared by:	Checked:	Date:
JK	BR	May 2018
Project Director:	Michael McDonnell	
Drawing Status:	Preliminary	

TOBIN
Patrick J. Tobin & Co. Ltd.

TOBIN Consulting Engineers,
Fairgreen House, Fairgreen Road,
Galway, Ireland.
tel: +353-(0)91-565211
fax: +353-(0)91-565398
e-mail: galway@tobin.ie
www.tobin.ie

Drawing No.:	10402-1016 D02
--------------	-----------------------

Appendix D(2)

Galway County Council Conditions Compliance Letter

Áras an Chontae,
Cnoc na Radharc, Gaillimh.
H91 H6KX.

Áras an Chontae,
Prospect Hill, Galway.
H91 H6KX.

Fón/Phone: (091) 509 000
Facs/Fax: (091) 509 010
Idirlíon/Web: www.gaillimh.ie
www.galway.ie

@GalwayCoCo
GalwayCounty



Comhairle Chontae na Gaillimhe
Galway County Council

**c/o Brendan Rudden,
Tobins Consulting Engineers,
Fairgreen House,
Fairgreen Road,
Galway City.**

Tithíocht
Housing
(091) 509 300
housing@galwaycoco.ie

Deontais Tithíochta
Housing Grants
(091) 509 301
housing@galwaycoco.ie

Seirbhísí Corparáideacha
Corporate Services
(091) 509 225
corpserv@galwaycoco.ie

Timpeallacht & Tréidliacht
Environment & Veterinary
(091) 509 510
environment@galwaycoco.ie

**Bóithre, Iompar, Cúrsaí Mara
& Seirbhísí Ginearálta**
Roads, Transportation, Marine
& General Services
(091) 509 309
roads@galwaycoco.ie

Acmhainní Daonna
Human Resources
(091) 509 303
hr@galwaycoco.ie

Mótarcháin
Motor Taxation
(091) 509 099
motortax@galwaycoco.ie

Clár na dToghthóirí
Register of Electors
(091) 509 310
electors@galwaycoco.ie

Seirbhísí Uisce
Water Services
(091) 509 505
water@galwaycoco.ie

Pobal & Fiontar
Community & Enterprise
(091) 509 521
community@galwaycoco.ie

Pleanáil
Planning
(091) 509 308
planning@galwaycoco.ie

Leabharlann
Library
(091) 562 471
info@galwaylibrary.ie

Our Ref: 09/1925 (ABP Ref. 07.237219)

21st of June 2018

RE: Planning Ref. No. 09/1925 (ABP Ref. 07.237219) – Planning permission for construction of a residential/commercial development and the completion of the North-South Oranmore distributor road (gross floor space 25,930.03sqm), in the townland of Oranhill Oranmore Co. Galway.

Applicant: Mr. James Cannon

A Chara,

I refer to your letter dated the 25th of May 2018.

For your records, the Planning Authority is satisfied that the compliance documents submitted with respect to meeting the requirements set out by An Bord Pleanála for Condition no. 4 (i.e. distributor/link road to be constructed in Phase 1) and Condition no. 10 (i.e. details to be agreed for the internal road network) the under planning reference number PL 07.237219 is in compliance with the provisions said conditions.

Mise, le meas,

James Russell

**A/Senior Executive Planner
Planning, Environment & Emergency Services.
Galway County Council**

Appendix D(3)

Correspondence from Galway County Council in relation to the provision of a new footpath on the L4103, Old Limerick Road

Áras an Chontae,
Cnoc na Radharc, Gaillimh.
H91 H6KX.

Áras an Chontae,
Prospect Hill, Galway.
H91 H6KX.

Fón/Phone: (091) 509 000
Facs/Fax: (091) 509 010
Idirlíon/Web: www.gaillimh.ie
www.galway.ie

@GalwayCoCo
GalwayCounty

Seirbhísí Corparáideacha
Corporate Services
(091) 509 225
corpserv@galwaycoco.ie

Tithíocht
Housing
(091) 509 300
housing@galwaycoco.ie

Timpeallacht & Tréidliacht
Environment & Veterinary
(091) 509 510
environment@galwaycoco.ie

Bóithre, Iompar, Cúrsaí Mara
& Seirbhísí Ginearálta
Roads, Transportation, Marine
& General Services
(091) 509 309
roads@galwaycoco.ie

Acmhainní Daonna
Human Resources
(091) 509 303
hr@galwaycoco.ie

Mótarcháin
Motor Taxation
(091) 509 099
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Clár na dToghthóirí
Register of Electors
(091) 509 310
electors@galwaycoco.ie

Seirbhísí Uisce
Water Services
(091) 509 505
water@galwaycoco.ie

Pobal & Fiontar
Community & Enterprise
(091) 509 521
community@galwaycoco.ie

Pleanáil
Planning
(091) 509 308
planning@galwaycoco.ie

Leabharlann
Library
(091) 562 471
info@galwaylibrary.ie



Comhairle Chontae na Gaillimhe Galway County Council

FAO: Paul Fitzmaurice,
Arlum Ltd.,
Wolfe Tone House,
Father Griffin Road,
Galway.

Date: 11th of April 2019

RE: Proposed Footpath – L 4103 (Old Limerick Road) Oranmore

Paul,

Further to our discussion, I can confirm that Galway County Council have received representations in relation to the provision of a footpath on the L4103, Old Limerick Road as indicated in the map below. However, due to resource constraints (i.e. funding) it is not in the current roads programme to provide this infrastructure.



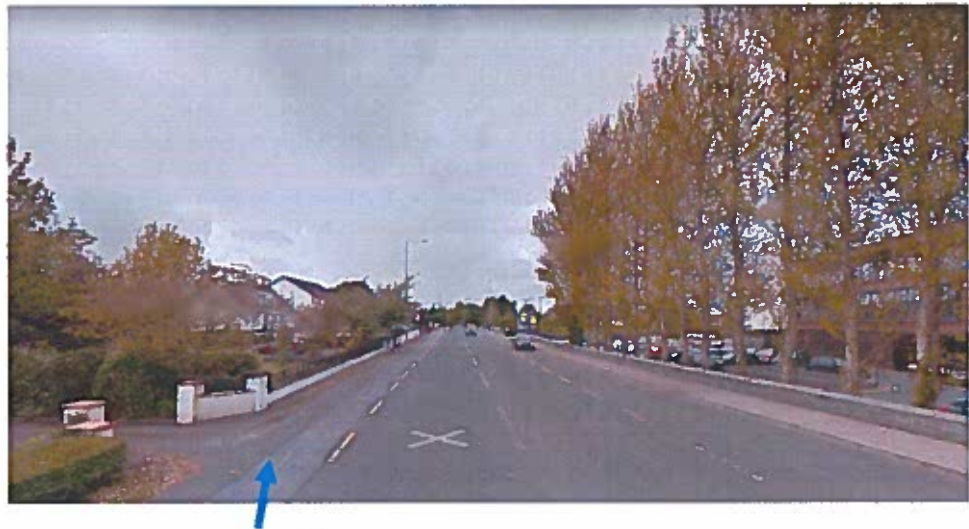
Proposed footpath location

Thus, Galway County Council will seek a development contribution towards the development of this footpath from Arlum Ltd., and their proposed strategic housing scheme at Moneyduff, Oranmore, Galway.

Alternatively, Galway County Council would consider entering into an agreement with Arlum Ltd., were the footpath will be provided by Arlum Ltd. on behalf of Galway County Council.

Note:

1. The hard shoulder on the southern side of the L4103 is at least 3m in width and thus the requisition of lands would not be required to facilitate this development.



Hard shoulder on southern side of the L4301, Old Limerick Road.

2. It is estimated the cost of providing this footpath is less than the Part VIII Planning threshold. Thus, Galway County Council would not require planning permission to provide this footpath.

Regards,

A handwritten signature in black ink, appearing to read 'Daithí Flood', written over a horizontal line.

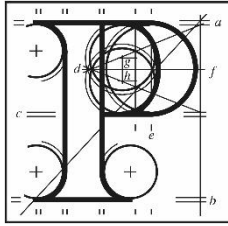
Daithí Flood
Roads, Transportation, Marine and General Services

Phone: 091 509 050 (Direct Line)

Email: dflood@galwaycoco.ie

Appendix E

ABP Reference 301952-18 Inspectors Report



An
Bord
Pleanála

S. 4(1) of Planning and Development (Housing) and Residential Tenancies Act 2016

Inspector's Report ABP-301952-18

Strategic Housing Development

212 no. residential units, crèche, new vehicular and pedestrian site access from the North-South Oranmore distributor road, communal and private open space, landscaping, car parking, site services and all associated site development works.

Location

Moneyduff and Oranhill, Oranmore, Co. Galway

Planning Authority

Galway County Council

Applicant

Arlum Limited

Prescribed Bodies

Dept. of Culture, Heritage and the Gaeltacht
Transport Infrastructure Ireland

Irish Water

Observers

24 submissions – see Appendix I

Date of Site Inspection

30th July 2018

Inspector

Sarah Moran

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1.0 Introduction

- 1.1. This is an assessment of a proposed strategic housing development submitted to the Board under section 4(1) of the Planning and Development (Housing) and Residential Tenancies Act 2016.

2.0 Site Location and Description

- 2.1. The site lies between 0.6 km and 1.2 km south of the town centre of Oranmore, Co. Galway and c. 8 km from Galway city centre. It has a stated area of 8.7 ha and consists of several fields under rough pasture containing stone walls and hedgerows. Suburban housing has been built on the adjoining lands to the north (Beech Park and Coill Clocha) and south (Orancourt, Oranhill Road / Drive) and further development is permitted on lands to the immediate east and south, see section 4.0 below. The N67 (formerly N18 Galway to Gort road) is c. 210 m to the east of the site, this has been bypassed by the M18 since 2017. The land to the immediate west of the site is flat and only c. 2 m above sea level, this area is part of the Galway Bay Complex SAC (site code 000268) and proposed Natural Heritage Area (pNHA). The site is also c. 0.5 km to the east of lands within the Inner Galway Bay SPA (site code 04031). Cregganna Marsh SPA (site code 004142) and NHA (site code 000253). is c. 0.3 km south of the development site. The land on the site slopes unevenly up from that level to c. 7.6 m – 9.7 m above OD along the western boundary of the site, with some higher mounds within the site. The remnants of a medieval tower at Moneyduff Castle (recorded monument GA095-084) stand in the south-eastern part of the site.
- 2.2. The application site boundary includes an existing road within Coill Clocha estate to the immediate north of the main part of the development site, connecting to a local access road to the north of the site.

3.0 Proposed Strategic Housing Development

- 3.1. The development involves 212 no. residential units as follows:

UNIT TYPE	NO. OF UNITS	%
Houses		
House Types A, C, E, F 4 bed semi / detached	74	35%
House Types B and D 3 bed semi / terraced units	70	33%
House Type J 2 bed terrace	12	6%
Apartments		
House Types G, H 2 bed duplex apartment units	56	26%
Total Houses and Apts	212	

3.2. The application also includes:

- Crèche (206 sq.m.) and associated play area and car parking.
- Landscaping and public open space. The remains of Moneyduff Castle are to be surrounded by a 20m exclusion zone to be incorporated into the public open space.
- New vehicular and pedestrian access from the North-South Oranmore Distributor Road as permitted under PL07.237219. There is an agreement between the applicant and the adjoining landowner for the construction of an access road from the existing roundabout, the north-south Oranmore road and the roundabout where both roads meet. The applicant has the benefit of appurtenant rights of way, wayleave and other easements, rights and privileges allowing access to and egress from the public road.
- Connection to the Irish Water foul network at an existing watermain near Coill Clocha. A letter of consent from Galway County Council is submitted.
- Part V proposals comprising the transfer of units at the development site to the planning authority.

3.3. The development is to be phased as follows over c. 4 years:

- Phase 1 at the northern end of the site. 71 no. units including the duplex apartments. Also road access to the roundabout at the development access, to be used as construction access.
 - Phase 2 at the centre of the site, adjoining the roundabout. 52 no. houses.
 - Phase 3 at the south western corner of the site, adjacent to Orancourt. 35 no. houses.
 - Phase 4 at the south eastern corner of the site, including Moneyduff Castle. 54 no. houses and the play area.
- 3.4. The application is accompanied by an Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS).

4.0 Planning History

4.1. Development Site

- 4.1.1. There are no details on file of any relevant planning history relating to the development site.

4.2. Adjacent Sites

- 4.2.1. Lands to the East of the Development Site 04/305, 09/1925, PL07.237219 and 15/1334

Relating to the parcel of land to the east, between the development site and the N67 (formerly N18). Permission was granted under reg. ref. 04/305 for the construction of 89 no. residential units, a crèche and all associated roads and services, incorporating part of the Oranmore north-south distributor route as contained in the Oranhill Action Plan. The Board granted permission for a housing development of 161 no. units, a hotel and a commercial centre in 2010 under PL07.237219, including the completion of the Oranmore north-south distributor road as permitted under 04/305 and an east / west link from the distributor road to the Rocklands roundabout on the N67 (then the N18). The duration of permission was extended until 2020 under 15/1334. These lands remain undeveloped at present.

- 4.2.2. 15/1107 PL07.246315 Lands to the South of the Development Site

The Board granted permission for 68 houses to the south of the current site on 25th July 2016. This site has not been developed to date.

5.0 Section 5 Pre Application Consultation

5.1. Pre-Application Consultation

5.1.1. The pre-application consultation related to a proposal to construct 192 no. residential units including 172 no. houses and a childcare facility.

5.1.2. A section 5 consultation meeting took place at the offices of Galway County Council on 24th April 2018. Representatives of the prospective applicant, the planning authority and ABP were in attendance. Following consideration of the issues raised during the consultation process, and having regard to the opinion of the planning authority, ABP was of the opinion that the documentation submitted required further consideration and amendment to constitute a reasonable basis for an application for strategic housing development. The issues raised were as follows:

- The number and type of housing units proposed on the site, with regard to the advice given at section 5.11 of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas issued in 2009 regarding greenfield suburban sites and the advice at section 2.4 of the Guidelines for Planning Authorities on Sustainable Urban Housing: Design Guidelines for New Apartments issued in March 2018, as well as to the profile of housing need in Galway across all sections of the community.
- The provision of access to the proposed housing development. It was noted that the road links from the site to existing roads that are authorised under PL07.237219 would not conform with the provisions of DMURS or the National Cycle Manual. Reliance on the previously authorised links might therefore raise issues of compliance with current road safety standards. Housing development upon the prospective application site could also be constrained by the limited period left within which to implement the previous permission. Consideration to be given to the inclusion of the required connections to the existing road network in any proposed housing development and the site of the application, in which case the proposed development would also include the consequent variations to planning permissions for housing on the adjoining land that might be necessary.

The provision of direct and convenient access for pedestrians and cyclists from housing on every part of the site to the rest of the town, and in particular to its centre, to be a key consideration for any development of the site.

- Connections between the development and the existing water supply and foul sewerage systems, having regard to the separation of the site from the proposed connection points on the existing networks and the scope of the planning exemptions available for works by Irish Water. Consideration to be given to the inclusion of the works to provide the necessary connections as part of any proposed development within the application site.
- Whether the submitted documents should or might need to include an EIAR, having regard to the threshold set out at section 10(b)(iv) of Part 2 of Schedule 5 of the Planning and Development Regulations 2002-2018, and to the requirement for works outside the site as currently delineated to provide access to roads, the public foul sewerage network and the public water supply, as well as to the criteria set out in Schedule 7 of the regulations regarding sub-threshold projects and the proximity of the proposed housing development to an SAC and recorded monument.

5.1.3. The opinion notification pursuant to article 285(5)(b) also referred to specific information that should be submitted with any application as follows:

1. A Natura Impact Statement.
2. A report prepared by a suitably qualified person on the likely impact of the proposed development on archaeology, in particular upon the recorded monument at Moneyduff Castle GA095-084. It should include a report on archaeological test excavations that have been informed by a prior geophysical survey, and a detailed conservation and management proposal to ensure the future preservation of the recorded monument including a description of its current status and condition.
3. A site specific flood risk assessment and details of proposals for the drainage of the site and the attenuation of surface water runoff, as well as details demonstrating the capacity of the receiving waters for stormwater effluent and of the wastewater treatment plant to cater for foul effluent from the proposed development.

4. A statement specifying who would be responsible for carrying out any works to provide the supporting infrastructure that would be required to service the proposed housing development, including roads, watermains and sewers, and specifying when the works would be carried out in relation to a phasing programme for the proposed housing development. Information should also be submitted to demonstrate that the responsible person would have the requisite legal interest in land to carry out those works, or the agreement of a person who does. If the works are not included within the proposed development and the boundary of the application site, then information should be submitted that demonstrates that the consents necessary for those works under the planning act and other laws have been obtained.
5. A report prepared by a suitably qualified and competent person demonstrating specific compliance with the requirements set out in the Design Manual for Urban Roads and Streets and the National Cycle Manual, as well as a map illustrating pedestrian, cycle and vehicular links from each part of the proposed development on the site to the rest of the town.
6. Proposals for the taking-in-charge of common areas, services and facilities in the development and their ongoing management and maintenance, including a building lifecycle report for apartment buildings in accordance with section 6.13 of the 2018 Apartment Design Guidelines. The proposals should have due regard to section 180 of the Planning and Development Act, 2000 (as amended), the taking-in-charge policy of the planning authority and any relevant ministerial policies, including those stated in Circular Letter PL5/2014.
7. Proposals for compliance with Part V of the planning act.

5.2. Applicant's Response to Pre-Application Opinion

- 5.2.1. The application includes a statement of response to the pre-application consultation, as provided for under section 8(1)(iv) of the Act of 2016, which may be summarised as follows.
 - The proposed residential density has increased from 26.56 units / ha at the section 5 consultation to 30.94 units / ha in the current proposal. The plot ratio has increased from 0.32 to 0.37. This is in accordance with the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas'

guidance for greenfield suburban sites. This is considered an appropriate density for the development site with regard to constraints comprising:

- Presence of a Recorded Monument in the south eastern corner of the site, with the associated 20 m exclusion zone.
 - Presence of an NHA and SAC to the immediate west of the site.
 - Lands to the immediate west of the site are within the 10-year tidal flood extent.
 - The narrow shape of the land zoned for residential development at the site.
- It is submitted that the more apt policy provision for the development site is that as a small town / village 'edge of centre' site, as per the guidelines on sustainable residential development. This is due to the location of the site outside the Galway Metropolitan area and to the current population of Oranmore of 4,900 (2016 census). The guidelines provide for densities of 20-35 dwellings / ha at such locations. In addition, the site is located in a 'peripheral and / or less accessible urban location' as per the 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities', which allow for development with a minority of apartments at low-medium densities (broadly < 45 dwellings / ha) at such locations.
 - The Galway Council Housing Strategy identifies a need for c. 4,133 units for the plan period 2015-2021 and an anticipated social housing need of 513 units. An assessment of the changing demographic profile of the county indicates a need for a greater mix of housing types and sizes in the future. The development plan core strategy estimates a population increase of 1,170 for Oranmore and 363 new dwelling units. The development provides 212 no. residential units with a mix of 32.1% 2 bed units, 33% 3 bed units and 34.95% 4 bed units and a mix of house types of 26.4% duplex units, 10.4% terraced, 55.7% semi-detached and 7.5% detached. It is submitted that current market prices do not meet the delivery costs of apartments, based on a recent report by the Society of Chartered Surveyors of Ireland 'The Real Costs of New Apartment Delivery, Analysis of Affordability and Viability'.

- The applicant proposes to transfer 21 no. units to meet Part V requirements.
- The applicant has submitted proposals to construct the north/south and east/west links permitted on the adjoining site to the east under PL07.237219 and 15/1334, to the satisfaction of Galway County Council. The permitted layouts include pedestrian and cycle facilities. Elements of the permitted roads have been revised within the permitted corridor to achieve compliance with DMURS. A public lighting scheme is incorporated in compliance with condition no. 15 of 15/1334. The proposed roads layout of the development will also provide a high level of pedestrian accessibility between the development and the Oranhill estate, the Maree Road and Coill Clocha to the north and onwards to the centre of Oranmore. The application includes proposals to provide a new footpath on the L4103, Old Limerick Road, to ensure a continuous footpath between the development and Oranmore town centre. A statement of compliance with DMURS is submitted.
- The red line site boundary has been revised to include the proposed water supply and foul sewerage connections, resulting in a revised site area of 8.7 ha.
- The application includes a sub-threshold EIAR and a NIS.
- The specific information required by the Board has been submitted including an archaeology report; a conservation management plan; a flood risk assessment; a report on civil works; statement in relation to who would be responsible for carrying out any works to provide supporting infrastructure to serve the development; details of legal interest for the construction of adjoining access roads and services; phasing plan; details of compliance with DMURS and the National Cycle Manual; proposals for taking in charge; building lifecycle report; Part V proposals.

6.0 Relevant Planning Policy

6.1. National Policy

6.1.1. The following is a list of relevant section 28 Ministerial Guidelines:

- 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' including the associated Urban Design Manual.

- ‘Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities’ as updated March 2018.
- ‘Design Manual for Urban Roads and Streets’ (DMURS)
- ‘The Planning System and Flood Risk Management’ including the associated ‘Technical Appendices’
- ‘Architectural Heritage Protection Guidelines for Planning Authorities’
- ‘Childcare Facilities – Guidelines for Planning Authorities’
- ‘Framework and Principles for the Protection of Archaeological Heritage’ (Dept. of Arts, Heritage, Gaeltacht and the Islands, 1999)
- ‘Urban Development and Building Heights Guidelines for Planning Authorities’ (Consultation draft, August 2018)

6.2. Galway County Development Plan 2015-2021

- 6.2.1. The overall development plan approach is based on the promoting the development of Galway City and the associated Galway Metropolitan Area (GMA) along with the development of key towns and smaller villages along strategic development corridors focussed on transportation routes. There is a strategic economic corridor to the east of Galway city between Oranmore and Attymon, which is identified as an area with potential to attract significant levels of investment and stimulate economic development and employment creation, performing a number of economic functions to support both the city, county and broader region. The development plan incorporates the Galway Transportation and Planning Study (GTPS), as adopted by both Galway City and County in 2003, which also proposed consolidating development within Galway City and County within a planned corridor for expansion to the east.
- 6.2.2. The core strategy identifies Oranmore as a ‘key town’ at the edge of the GMA, which is at the top of the settlement hierarchy. Key towns are at the 4th tier of the settlement strategy with populations > 1,500. Oranmore is partially located within the GMA but the development site is located outside this area. The following development plan objectives apply.

Objective SS 1 – Galway Metropolitan Area:

“Galway County Council shall support the important role of Galway City and the Galway Metropolitan Area (which includes the City area and the Electoral Divisions of Oranmore, Bearna, Galway Rural and Ballintemple which are inextricably linked to and function as part of a greater Galway City), as key drivers of social and economic growth in the County and in the wider Western Region and will support the sustainable growth of the strategic settlements, including the future development of Ardaun and Garraun, within the Galway Metropolitan Area.”

Objective SS 5 – Development of Key Towns:

“Support the development of the key towns of the County as outlined in the Core Strategy and Settlement Strategy in order to sustain strong, vibrant urban centres which act as important drivers for the local economies, reduces travel demand and supports a large rural hinterland, while providing a complementary role to the hub town of Tuam and the smaller towns and villages in the County.”

The core strategy allocates a population of 1,170 to the town of Oranmore / Garraun with a housing land requirement of 22.67 ha, as originally provided for under the 2012 Oranmore LAP.

- 6.2.3. Housing policy objective UH0 10 – Sequential Development includes a positive presumption in favour of the sequential development of suitably serviced Residential Phase 1 lands in zoned towns and villages. Development on Residential Phase 2 lands will normally only be considered where 50% of the lands in Residential Phase 1 are committed to development. Objective UHO 11 – Development Densities states:

“Galway County Council shall ensure that the density of new development is appropriate to the particular land use zone and/or site context, is in keeping with the existing development pattern of the area, does not unduly impact on the amenities of the area and results in a positive relationship between existing development and any adjoining public spaces. The development of higher density development shall be promoted in appropriate locations, such as suitable sites within the town/village centre and adjacent to public transport facilities, where such development is compatible with heritage and urban design objectives, infrastructure capacity and environmental considerations. New development shall also have regard to the ‘Sustainable Residential Development in Urban Areas’ Guidelines (or any updated/superseding document).”

6.2.4. Development plan table 13.1 provides the following indicative density standards for residential developments:

Residential Density	Units / ha	Possible Appropriate Locations
Medium to high	35-50	Town centre or immediately adjacent to public transport hubs.
Low to medium	15-35	Neighbourhood centres (typically within 400m walking distance of centre point), inner urban suburbs.
Low	5-15	Urban periphery, outlying lands, areas with capacity/ environmental constraints.

6.3. Oranmore Local Area Plan 2012-2022

6.3.1. The Oranmore LAP 2012 has been extended to from 2017 to 2022. The originally allocated population growth of 1,170 additional persons and housing land requirement of 22.67 ha have been incorporated into the core strategy of the current county development plan. The report of the Chief Executive of Galway County Council on the proposed deferral of notices under Section 20 of the Planning & Development Act 2000 noted that, as of May 2017, there had been limited development in Oranmore in the period since the adoption of the LAP and there was no evidence that this was going to change substantially in the immediate period ahead. Practically all of the 22 ha required for phase 1 residential development remained undeveloped.

6.3.2. The majority of the site is zoned 'R1', 'Residential Phase I', with some of the western margins zoned 'OS', 'Open Space / Recreation and Amenity'. As per LAP objective DS 6 – Residential Development Phasing, residentially zoned lands are to be developed sequentially with Phase 1 lands identified for development in the short to medium term in locations that are serviceable and accessible. LAP section 3.1.3 provides the following standards for residentially zoned lands:

- Plot ratio 0.10 to 0.50

- 50% maximum site coverage
- 15% minimum public open space

It also repeats residential density standards set out in development plan table 13.1 as above.

6.3.3. The following relevant LAP policies and objectives are noted:

- LU 3 – Residential (R)
- LU 15 – Residential Densities
- Policy RD1 – Residential Development
- Policy RD 2 – Phased Development on Residential Zoned Lands
- Objective RD 1 – Phased Residential Development
- Objective RD 2 – Quality Housing Environments
- Objective RD 3 - Housing Options
- Objective RD 4 – Open Space in Residential Areas
- Objective RD 5 – Social and Affordable Housing
- Objective CF 3 – Childcare Facilities
- Objective CF 8 – Provision of Recreation and Amenity Facilities in Oranhill is to ensure the provision of recreational and amenity facilities as an integral part of any development proposals for Oranhill to the south of the development site.
- Objectives TI 24 and TI 25 to provide the Oranhill Distributor Route from the Maree Road to the Rocklands roundabout on the N18 (now N67). Objective TI 27 – Maree Road is to preserve and improve the Maree Road.
- Policy UI4 – Flood Risk Management and Objective UI 13 – Flood Zones and Appropriate Land Uses (Refer to Map 3A/3B)
- Objective UD 7 – Landscape Character, Values, Sensitivity and Views / Prospects
- Objective HC 8 – Monuments and Places and Objective HC 9 – Archaeological Assessment.

- Objective NH 11 – Summer Botanical Survey for Lands at Moneyduff is to ensure that a Summer Botanical Survey is undertaken and submitted as part of any planning application for development of lands beside the cSAC/pNHA designated site in Moneyduff.

6.4. Statement of Consistency

6.4.1. The applicant has submitted a Statement of Consistency as per Section 8(1)(iv) of the Act of 2016, which indicates how the proposal is consistent with the policies and objectives of section 28 guidelines, the County Development Plan and the LAP and other regional and national planning policies. The following points are noted.

- The development complies with the national policy objectives of the National Planning Framework (NPF) relating to the provision of new homes in existing built-up settlements and suburbs, also at locations that can support sustainable development and at an appropriate scale of provision relative to location, also objective policy 3A in relation to lifetime adaptable homes and policy objective 35 in relation to residential density.
- The development complies with the ‘Sustainable Residential Development in Urban Areas’ in relation to the sequential approach to development; the provision of community facilities; residential density and the 12 criteria provided in the accompanying Urban Design Manual.
- The proposed housing mix complies with SPPR 1 of the apartment guidelines. The apartment floor areas comply with SPPR 3. The design and layout comply with SPPRs 4, 5 and 6. The development complies with other design criteria set out in the apartment guidelines in relation to storage space, private amenity space, security considerations, communal facilities, children’s play, car and cycle parking.
- A statement of compliance with DMURS is submitted. The development provides a total of 383 no. car parking spaces, exceeding the total no. of 371 required to comply with development plan car parking standards. Cycle parking is to be provided in accordance with the requirements of the National Cycle Manual.
- The development is consistent with the population target for Oranmore set out in the County Development Plan core strategy and settlement strategy. The

development meets the 10% Part V obligation. It complies with development plan objectives in relation to high quality residential development, urban design and sequential residential development. Also relevant traffic and transportation objectives and car / cycle parking provision. Also other relevant development plan objectives relating to wastewater treatment; waste management; energy efficiency; green infrastructure; flood risk assessment and climate change; archaeological heritage and protection of recorded monuments; natural heritage and biodiversity; landscape and environmental management; education and childcare facilities; social and community development.

- The development site is zoned for residential development under the LAP. Lands within the site that are zoned for open space will be landscaped. The development is in accordance with LAP objective DS6 – Residential Development Phasing. The proposed residential density of 30.94 units / ha is in accordance with LAP section 3.1.3 with regard to plot ratio and units / ha and consistent with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas guidance on ‘edge of centre’ sites. It corresponds to the location ‘peripheral / less accessible urban location’ in the apartment guidelines, i.e. suitable for limited, very small scale higher density development. The proposed open space provision complies with the LAP requirement of 15% minimum open space provision. The private open space provision exceeds the standards set out in the Galway County Development Plan. A design statement is submitted in accordance with LAP objective UD 6. The development complies with other LAP objectives in relation to housing mix; part V; open access fibre ducting; childcare facilities; amenity, sports, play and recreation facilities; cycling, parking and mobility management, climate change, flooding and site services; cultural and natural heritage.
- The applicant proposes to construct an access route between the existing and permitted residential developments north and south of the development site and an east/west link between the development and the N67 Rocklands roundabout. These routes are permitted under PL07.327219, as extended under 15/1334 and

the works will be carried out in compliance with those permissions, in consultation with the planning authority. A statement of compliance with DMURS is submitted. A map indicating pedestrian access routes to the centre of Oranmore is submitted. The applicant submits proposals to achieve a new footpath on the L4013. The car and cycle parking provision meet or exceed development plan standards.

- The submitted flood risk assessment includes a statement of compliance with flooding policies in the County Development Plan and LAP.
- The design of the proposed childcare facility is in accordance with the recommendations of the Childcare Facilities Guidelines for Planning Authorities.

7.0 Third Party Submissions

7.1. The submissions were primarily made by or on behalf of local residents, particularly residents of Coill Clocha and Oranhill. There is also a submission by Hildegarde Naughton T.D. The main points made in the submissions may be summarised as follows

- Unsustainable development that will help to perpetuate the expansion of Galway in a car dependent form. The density is below the 35-50 dwellings / ha range recommended for outer suburban / greenfield sites in the Sustainable Residential Developments in Urban Areas guidelines. There are traffic congestion and poor public transport connections between Oranmore and Galway. The development will be car dominated with on street parking. The 2016 census indicates that 82% of workers in Oranmore travel to work by car and other private vehicles. The submitted Traffic and Transportation Statement is misleading with regard to pedestrian connectivity to public transport and other services.
- Lack of strategic planning for the development of the Oranmore area, which has been ad-hoc and piecemeal. Lack of social infrastructure and amenities in Oranmore to cater for the development, i.e. open spaces, schools, playgrounds, sports facilities, community centre, crèche.
- Impacts on residential amenities by way of noise, disturbance, overlooking and loss of privacy, overshadowing.
- Development out of character with the surrounding area.

- Excessive density of development in the context of the small town of Oranmore.
- Proposed housing mix does not cater for the need for family housing in Oranmore. Development will encourage speculative landlords in the area.
- Clustering of social housing provision at the southern end of the site, close to Oranhill estate.
- Impacts on visual amenities, in particular at the Maree Road, which is part of the Wild Atlantic Way.
- Adverse impacts on property values in the area.
- Non compliance with DMURS.
- Development will generate additional traffic congestion on existing road junctions in the area, especially the entrance to Coill Clocha estate.
- Traffic safety issues due to additional traffic through adjoining estates, particularly Coill Clocha and the entrance to Oranhill from the Maree Road, due to the presence of many young families. Use of the north/south distributor road as a 'rat run'. Need for traffic calming measures on adjoining roads in residential areas.
- Traffic hazard at the entrance to Coill Clocha estate due to its proximity to the Lidl car park and delivery access. This entrance is likely to be heavily used by traffic travelling to the centre of Oranmore from the proposed development. Concerns about pedestrian safety at this location due to lack of pedestrian crossing facilities.
- Development will result in the creation of a low quality pedestrian environment. Need for additional pedestrian and cyclist facilities to serve the development including a connection to Beech Park to the south of the proposed development. Need to ensure the development of the proposed pedestrian link to the Oranhill development at the south western corner of the development. Need for adequate cycle parking for the apartments.
- Concerns about the safety of cyclists at local junctions due to increased traffic. The development will result in additional cycle traffic on the L4103 between Coill

cloche and the centre of Oranmore, which serves several local schools. There are several junctions on the L4013 that are very hazardous for cyclists at present.

- Construction traffic congestion.
- Flood risk due to proximity to an existing flood plain to the west of the site.
- Adverse impacts on European Sites. Development will result in the destruction of Annex I habitat within the site. The survey work carried out was not of sufficient duration to determine the status of the grassland habitat with regard to the potential presence of orchid species.
- Additional development should not be permitted in the area until unfinished parts of the adjoining Oranhill estate are completed, including an unfinished commercial development, medical centre and crèche, 'The Hole in the Ground', reg. ref. 05/4805 and 11/407.

7.2. **Third Party Submissions Conclusion**

I have considered all of the documentation included with the above third party submissions.

8.0 **Planning Authority Submission**

8.1. Galway County Council has made a submission in accordance with the requirements of section 8(5)(a) of the Act of 2016. It summarises observer comments as per section 8(5)(a)(i) and the views of the relevant elected members of the Oranmore Municipal District, as expressed at their meeting of the 16th July 2018. The planning and technical analysis in accordance with the requirements of section 8(5)(a)(ii) and 8(5)(b)(i) may be summarised as follows.

8.2. PA Comment on Zoning and Core Strategy

- The development plan core strategy allocates a population of 1,170 to Oranmore / 363 dwellings over the plan period. A small amount of this population is accounted for by extant planning permissions including the permission for 68 units on the adjoining lands to the south under PL07.246315. The site is located outside the Galway Metropolitan Area (GMA) but functions as part of Oranmore town, which is located within the GMA. The site is also located within the Draft

Metropolitan Area Plans for Galway, which are being prepared as part of the Regional Spatial and Economic Strategy for the North and Western Regions. The planning authority is satisfied that the development is consistent with the core strategy and settlement strategy of the current county development plan.

- The site is predominantly zoned Residential Phase 1 under the Oranmore LAP, with the western extremities zoned 'Open Space / Recreation and Amenity', corresponding to the Indicative Flood Zones A and B of the Strategic Flood Risk Assessment. The planning authority is satisfied that the development of the area of the site that is zoned for residential development is compliant with the LAP.

8.3. PA Comment on Traffic and Vehicular Access

- The permitted north/south distributor road through the Coill Clocha estate was originally envisaged under the 2000 Oranhill Area Action Plan and is facilitated by the existing roundabout on the N67.
- Galway County Council has recently issued a Letter of Compliance with respect to conditions nos. 4 and 10 of PL07.237219, copy of same submitted. Details of the legal agreement to construct the distributor road are submitted, comprising folio details for folio GY121724F and a corresponding solicitor's letter.
- The link road is to be constructed as phase 1 of the proposed development, including footpaths and cyclepaths. No units shall be occupied until the road is completed and the planning authority has given written confirmation of same under PL07.237219. A similar approach is proposed for the subject application.
- The planning authority requires a financial contribution towards the development of a footpath within the hard shoulder of the L4103, as proposed in the submitted TTA. This will result in a safe pedestrian connection to Oranmore town centre and is welcomed by the planning authority.
- The Roads Dept. of Galway County Council recommends permission for the development subject to conditions including the completion of the permitted link road in advance of the commencement of development; the north / south link road will not be opened until the proposed development has been completed in its entirety and the payment of a special development contribution of €100,000 to Galway County Council for the provision of a footpath on the south side of the

L4103 unless an alternative agreement between the applicant and the planning authority can be reached.

8.4. PA Comment on Water Services and Flooding

- The planning authority is satisfied that the development can be facilitated by the existing Irish Water infrastructure and that the proposed surface water drainage arrangements are acceptable.
- On the basis of the information submitted with the application, in conjunction with the provisions of the current Galway County Development Plan and the Oranmore Local Area Plan, the planning authority is satisfied that the development will not exacerbate flood risks or cause flooding on site or elsewhere and therefore meets the requirements of the Flood Risk Management Guidelines.

8.5. PA Comment on Cultural Heritage

- The Oranmore Architectural Conservation Area (ACA) is located c. 585 m north of the development site. The planning authority is satisfied that the development will not result in adverse impacts on the character of the ACA.
- The integration of Moneyduff Castle into the layout of the development will provide an important focal point and sense of place, whilst maintaining the cultural heritage of the area and accommodating new development. The planning authority is satisfied that the development will not result in adverse impacts on the archaeological heritage of Oranmore.

8.6. PA Comment on Childcare Facilities

- Refers to LAP Objective CF 3.
- Based on the 2016 census figures for the 0-4 age cohort in Oranmore at 10.6% of the overall population and the projected population of approx. 595 for the proposed development, it is estimated that the development will have a population of c. 63 children of the 0-4 age cohort. The proposed childcare facility has capacity for 25 children. It is acknowledged that 31% of the development is 2 bed residential units and, therefore the overall number of children between 0-4 is likely to be less than 63 persons.

- The application does not include a Childcare Facility Assessment. The planning authority notes that there are currently no existing or permitted childcare facilities in the vicinity of the site. However, based on a review of the Tusla website in relation to existing childcare facilities in Oranmore and Galway City, the planning authority is satisfied that there are sufficient existing childcare options available in Oranmore that can accommodate the additional demand generated by the development. The planning authority considers that the crèche building should have a more flexible use outside childcare hours and should be made available to the local community for community purposes.

8.7. PA Comment on Design, Density, Layout and Open Space

- The 2016 census indicates that 31% of the population of Oranmore lives in 2 or less bedroom dwellings. Therefore, the provision of 32% of 3 bedroom units in the proposed development is considered appropriate to the area.
- The proposed net density of 30.94 units / ha complies with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas guidance for small towns, i.e. densities of between 15-35 units / ha. The site is also considered to function as part of the GMA. The proposed density is higher than that permitted on the adjoining site to the south under PL07.246315. The planning authority is satisfied with the proposed density on this basis.
- The proposed open space provision, site coverage and plot ratio are within acceptable parameters as per relevant requirements of the Oranmore LAP.
- The development meets relevant LAP standards with regard to open space, car parking, landscaping, overlooking, overshadowing and boundary treatment.
- The planning authority considers that the design, density, layout and open space provision of the proposed development are of a high standard, accord to best practice and are appropriate to the character of the surrounding area and the relevant provisions of the LAP and county development plan.

8.8. PA Comment on Part V

- The planning authority is satisfied that the proposed social housing units with associated costings meet the requirements of the Planning and Development Act

2000, as amended, and that the locations of the proposed units within the development promote social integration.

8.9. PA Comment on Appropriate Assessment

- Although the submitted AA screening report and NIS did not specifically identify the location and distribution of all Alkaline habitat within the Galway Bay Complex SAC, it did state that the site synopses and conservation objectives of these sites were considered at the time of preparing the report and in this regard, the location of alkaline fen was considered during the desk study. The screening report notes potential pathways for indirect effects on aquatic features of the SAC, including alkaline fens. The NIS report notes that the fen habitat to the west of the development site has been degraded by grazing and artificial drainage but these habitats will not be impacted upon as a result of the proposed development.
- The NIS notes that pathways for surface water runoff from the proposed development to the nearby SACs and SPAs are blocked by several means.
- The planning authority is satisfied that Creganna Marsh SPA was assessed in the AA screening and can be screened out due to its separation from the development site by Oranhill road and the associated Oranhill housing estate. The SPA therefore does not need to be considered further in the NIS. The Inner Galway SPA can also be screened out as it is separated from the site by > 300m of hedgerows, marsh / wet grassland and the Maree road, with no potential for significant effects on the SCI species for which the site has been designated.
- The planning authority notes the conclusions of the NIS and is satisfied that the proposed development is not located within or directly connected to or necessary to the management of any European site. The proposal, by reason of its nature and location and proposed implementation of best practice construction methods, either alone or in combination with other plans or projects, would not adversely affect the integrity of any European site.

8.10. PA Comment on EIA

- The PA accepts the justification submitted by the applicant for a sub-threshold EIAR.

- The EIAR does not include the consideration of alternatives. However, the planning authority is satisfied, having regard to the zoning objective of the site and the several iterations of the layout and design of the strategic housing scheme during stages 1 and 2 of the SHD process.
- The planning authority is satisfied that the EIAR has been prepared by competent experts and complies with article 94 of the Planning and Development Regulations 2000, as amended, and the provisions of Article 5 of the EIA Directive 2014.
- The planning authority is satisfied that the development will likely have a long term and positive impact on human health as a result of the provision of the north/south distributor link road and the creation of high quality accommodation.
- The planning authority is satisfied that the noise and vibration emitted by the development are not likely to have significant effects on the population or on human health, subject to noise monitoring, adherence with stated measures and a construction management plan.
- The planning authority notes the comments of the Dept. of Culture, Heritage and the Gaeltacht with regard to the Biodiversity section of the EIAR and a relevant third party submission from Coill Clocha estate with regard to impacts on the Annex I habitat within the development site.
- The planning authority is satisfied that detailed faunal records are outlined in the EIAR desk study, noting specific tables and sections of the report, also the field study carried out. It is also satisfied that there was no justification for a bat survey as no suitable structures or features for roosting bats were located within the site and that such data / information would not influence the outcome of any impact assessment for the proposal. The development includes the retention of treelines and hedgerows where possible to ensure connectivity for commuting and feeding bats.
- The site has been subject to scrub clearance, soil movement and grazing by horses since it was surveyed by the NPWS in 2006. This has altered the extent and character of the habitats on site and reduced the area of Annex I calcareous habitat within the site. As identified during the desk study, small white orchid (*Pseudorchis Albida*) has been recorded within the hectad in which the site is

located. However, this species was not recorded during the 2016 or 2017 field visits. Although there will be some loss of grassland habitat used by local pollinators, grassland habitat will be reinstated to the west in an open space to be managed as part of a wildflower area. The EIAR concludes that residual impacts on ecological receptors will be minor with no potential cumulative impacts.

- The EIAR chapter on land, soils and geology is noted. The development would alter the use of the land from rough agricultural to grassland. Its impact on land would therefore be significant. There is a recognised shortage of housing in Galway. There is no equivalent scarcity of land to graze animals. The site is zoned for residential use. The effect on land is therefore positive.
- The findings of the EIAR chapters on hydrology and hydrogeology and air and climate are noted.
- The landscape chapter of the EIAR is noted. The planning authority considers that the development will be most prominent in the landscape as viewed from the Maree road to the west of the site, due its elevation location relative to the road and to the low-lying nature of the SAC wetlands between the road and the site. The development will change the landscape of a relatively large site from one of rough agricultural lands to that of a residential suburb. This is considered to be a permanent and moderate impact as the site adjoins existing residential developments to the east, north and south. The design is of a reasonable standard and the urban form is similar to existing developments. The provision of parklands and open space within the development will help to reduce visual impacts. The planning authority considers that the development would not have a significant negative visual impact.
- The archaeology and cultural heritage chapter of the EIAR is noted. The planning authority considers that the development will not result in adverse impacts on the built or archaeological heritage of the development site or the wider area of Oranmore.
- The material assets and interactions chapters of the EIAR are noted.

8.11. PA Conclusion

8.11.1. The planning authority recommends permission subject to conditions.

9.0 Prescribed Bodies

9.1. Department of Culture, Heritage and the Gaeltacht

9.1.1. The following comments are made in relation to nature conservation issues:

- There was insufficient time at pre-application stage for the Department to provide nature conservation observations to the applicant's consultants prior to an application being made.
- The Galway Bay Complex SAC, which borders the application to the west, supports alkaline fen which grades seawards into salt marsh habitat. The smaller SAC outliers to the east and north-east support alkaline fen habitats. These fen areas and their location relative to the proposed development are not identified in the NIS. In addition, Cregganna Marsh SPA (not included in the NIS) is approximately 270m to the south of the development.
- The information and analysis provided in the NIS will need to be supplemented by the following in order to enable an appropriate assessment to be carried out:
 - Additional data and analysis available from the EIAR (including appendices), notably in respect of soils, geology, hydrology and hydrogeology;
 - Additional assessment and analysis with respect to the conservation objectives of the European sites at risk, and noting the habitats, species and attributes and targets of relevance.
 - Further assessment of the likely effects of the development along and in combination with other plans and projects, in particular on (a) qualifying interest alkaline fen habitats within the SAC, including as a result of water supply, water levels, directions of flow, water quality, need for drainage or drainage maintenance, need for flood risk measures, etc.; (b) special conservation interest bird species, including as a result of increasing disturbance and potential increases in recreational and amenity pressures.
- The biodiversity chapter of the EIAR lacks information on fauna arising from surveys. The site has been subject to scrub clearance and ground excavations over time but is species rich and diverse and supports a mosaic of open

calcareous grassland and herbaceous communities of open / disturbed ground and developing mixed scrub and woodland where soil cover is thin or absent. Lower areas fringing the SAC have deeper soils and there are indications of poor drainage and waterlogging. The submission lists the following considerations for the Board in its EIA:

- The size of the site (8.7 ha) and area of natural and semi-natural habitats present (and which will be lost);
- The presence of the Annex I habitat, Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (*important orchid sites) [6210], outside of a European site, and noting that this habitat is more extensive than indicated in Figure 4 of the EIAR, in the context of the significance of its national conservation status.
- The potential presence of rare and legally protected (Flora (Protection) Order, 2015) plant species, noting the type of habitats present and the limited information available in relation to vegetation communities and flora of the site;
- The potential presence of legally protected species of fauna, noting the extent of scrub cover on the site and the limited species surveys undertaken (no bat surveys);
- The value of the site for invertebrate communities and pollinators, e.g. butterflies and bees;
- Cumulative effects including the combined losses of limestone pavement and other rocky calcareous habits in the wider Oranmore area over the recent decades;
- The extent to which biodiversity issues will be consistent with or will contravene objectives and policies of the Galway County Development Plan and Oranmore LAP.

9.2. **Transport Infrastructure Ireland**

9.2.1. Recommends the following:

“The proposed development shall be undertaken in accordance with the recommendations of the Transport (Traffic) Assessment and Road Safety Audit submitted. Any recommendations arising should be incorporated as Conditions in the Permission, if granted. The developer should be advised that any additional works required as a result of the Transport Assessment and Road Safety Audits should be funded by the developer.”

9.3. **Irish Water**

9.3.1. The following is noted:

- Irish Water has issued a Confirmation of Feasibility for the proposed development. The development is a standard connection, requiring no network or treatment plant upgrades for water or wastewater by either the customer or Irish Water. No third party consents are required for these connections to take place.
- Irish Water confirms that subject to a compliant water and wastewater layout and a valid connection agreement being put in place between Irish Water and the developer, the proposed connections to the Irish Water network can be facilitated.

10.0 Assessment

10.1. The following are the principal issues to be considered in this case:

- Principle of Development
- Roads and Traffic / Transport Impacts
- Design and Layout
- Landscape and Visual Impacts
- Impacts on Moneyduff Castle
- Drainage, Flood Risk and Site Services
- Part V

These matters may be considered separately as follows.

10.2. Principle of Development

10.2.1. Zoning / LAP

The development site is located outside the Galway Metropolitan Area as per the Galway County Development Plan 2015-2021 but is within the development boundary of the Oranmore Local Area Plan 2012-2022. The development is in accordance with the LAP Phase 1 residential zoning of the site, to be developed prior to other residential zoned lands within the LAP area. The development plan core strategy and LAP allocate an additional population of 1,170 or c. 363 residential units for Oranmore for the period up to 2022. The submission of Galway County Council notes that only a small amount of this allocation has been developed with permission recently granted for 68 no. residential units on adjoining lands to the south of the development site under PL07.246315. Therefore, there is capacity for the development.

The proposed layout corresponds to the zoning of the eastern and southern parts of the site for residential development with areas on the western margin zoned 'OS', 'Open Space / Recreation and Amenity', to correspond to the indicative Flood Zones A and B as per the Strategic Flood Risk Assessment of the Oranmore LAP. The roads layout corresponds with LAP objectives TI 24 and 25 to provide a distributor route at Oranhill as it provides a link to the Rocklands roundabout on the N67 and a

north/south link between Coill Clocha to the north and Oranhill to the south. The site coverage and plot ratio of the development are in accordance with the standards for same set out in LAP section 3.1.3. The development is therefore generally in accordance with LAP objectives.

10.2.2. Residential Density and Housing Mix

The development has a stated net residential density of 30.94 units / ha. This was increased from a density of 26.56 units / ha, on foot of pre-planning advice from ABP. Given the location of the site contiguous to the 'key town' of Oranmore and close to the edge of the Galway Metropolitan Area (GMA), I consider that the site corresponds with the definition of an 'outer suburban / greenfield site', as per the Section 28 'Guidelines for Planning Authorities for Sustainable Residential Development in Urban Areas'. The Guidelines encourage densities of 35-50 units / ha at such sites, to involve a variety of housing types where possible. Development at net densities of < 30 units / ha is discouraged. The LAP does not include any specific objective in relation to residential density at this location. Both the LAP and the development plan provide an indicative density standard of 15-35 units at 'neighbourhood centre' locations typically within 400m walking distance of the town centre or at inner suburban locations. I consider that the proposed density is low for zoned and serviced land in an established residential area close to the edge of the GMA. However, given the site constraints including flood zones, proximity to a pNHA and to several European sites, roads objectives and the presence of a Recorded Monument, it is considered that the overall density is appropriate.

Development plan section 3.3.3 states that housing mix should be influenced by a range of factors including the nature of the existing housing stock and existing social mix in the area, the desirability of providing for mixed communities, the provision of a range of housing types and tenures to meet demand and the need to provide a choice of housing, suitable to all age groups and persons. The development is located in an area that is predominantly characterised by large, single family houses with some apartment development adjacent to the south at Oranhill. The proposed development comprises 35% 4 bed detached and semi-detached houses, 33% 3 bed semi-detached and terraced units and 32% 2 bed units, of which 6% are terraced houses and 26% 2 bed duplex apartments. I consider this mix to be

reasonable as it avoids a preponderance of large, detached houses and includes a mix of unit types and sizes that will enhance the housing mix of the area.

10.2.3. Childcare Facility

LAP Objective CF 3 – Crèche Facilities requires the provision of crèche facilities in mixed use / residential developments in accordance with the Childcare Facilities Guidelines for Planning Authorities. These guidelines recommend a minimum provision of 20 childcare places per 75 no. dwellings, i.e. c. 57 no spaces for the proposed development. The submitted statement of consistency indicates that the proposed childcare facility will cater for 25 no. children with 5 no. staff members. This falls short of the above requirement. I note that Section 4.7 of the ‘Sustainable Urban Housing: Design Standards for New Apartments’ states that the threshold for the provision of childcare facilities in apartment schemes should be established having regard to the scale and unit mix of the scheme, the existing geographical distribution of childcare facilities and the emerging demographic profile of the area, with 1 bed or studio units generally not be considered to contribute to a requirement for any childcare provision. Subject to location, this may also apply in part or whole to units with 2 or more bedrooms.

I note the comment of Galway County Council that, based on the 2016 census figures for the 0-4 age cohort in Oranmore at 10.6% of the overall population and the projected population of approx. 595 for the proposed development, it is estimated that the development will have a population of c. 63 children of the 0-4 age cohort. I also accept that 32% of the proposed residential units are 2 bed units which may not generate a demand for places in the childcare facility, as per the apartment guidelines. However, even if the 2 bed units are omitted entirely from the requirement for childcare, this would result in a requirement of c. 38 spaces to cater for the 3 and 4 bed units in the scheme. I note the comments in third party submissions regarding the failure to develop a permitted childcare facility in the adjoining Oranhill development and, while I accept the planning authority comment in relation to existing childcare facilities in Oranmore and Galway City, I consider that the scale of the proposed development at 212 no. 2, 3 and 4 bed units requires an adequate childcare facility. In addition, there can be issues around the viability of smaller childcare facilities and a risk that such facilities are eventually changed to other commercial uses. The applicant has not provided a rationale for the proposed

childcare provision with regard to the availability of existing facilities in the area. In the absence of same, I consider that the proposed crèche should be increased in size to a larger facility in accordance with the recommendations of the Childcare Guidelines. A condition requiring same may be imposed if the Board decides to grant permission.

10.2.4. Principle of Development Conclusion

To conclude, the proposed density, housing mix and crèche are considered to be acceptable in the context of site constraints and to be generally in accordance with relevant LAP, development plan and national policies. The development is therefore considered to be acceptable in principle.

10.3. **Roads and Traffic / Transport Impacts**

10.3.1. Existing and Proposed Roads Infrastructure

The development site has no direct road access at present. The N67 is c. 210 m to the east of the site. This was previously the N18 Galway to Gort route but has been bypassed since the new N18 motorway opened in September 2017. The eastern site boundary adjoins the parcel of land between the site and the N67, on which development has been permitted under PL07.237219, with an existing access to the Rocklands roundabout on the N67. The northern site boundary adjoins the Coill Clocha estate, including an internal road within that development. There are undeveloped lands fronting onto the Maree Road to the immediate west of the site and further undeveloped lands to the immediate south. A small area at the south western corner of the site fronts onto a distributor road within the Oranhill housing development. There are limited public transport services in the area. Oranmore train station is 1.5 km north west of the town centre, c. 33 minutes walk / 9 minutes cycle from the development site. The station provides services to Dublin, Galway and Cork. There are 2 bus stops nearby, one a 10 minute walk / 3 minute cycle and another a 23 minute walk / 7 minute cycle from the development site. Both serve routes to Galway, NUIG, GMIT and other locations.

The proposed development involves the construction of 2 no. connecting link roads, as permitted under the adjoining development PL07.237219:

- A north/south link between Coill Clocha estate to the north (which has been taken in charge by Galway County Council) and the Orancourt / Oranhill housing estate to the south (Oranmore distributor road).
- A roundabout at the development site access to the Oranmore north/south distributor road will also link to an east/west spur within the adjoining development permitted under PL07.237219 and connecting to the existing Rocklands roundabout on the N67.

The red line site boundary includes the access road through Coill Clocha estate but not the lands between the development site and the N67. The applicant submits that the permission PL07.237219 has been extended and will expire on 20th December 2020, reg. ref. 15/1334. There is a legal agreement in place between the applicant, Arlum Ltd. and the owner of the adjoining lands to the east, Roykeel Ltd, for the construction of both roads. The applicant has the benefit of right of way, wayleave and other easements to allow access and egress to / from the N67. Details of the legal agreement are submitted. The applicant will comply with roads conditions of PL07.237219 (conditions nos. 4 and 10), as extended under 15/1334, and has agreed same with the Roads Dept. of Galway County Council, details of the agreement are submitted. Elements of the permitted roads have been revised within the permitted corridor to achieve compliance with DMURS and other requirements of Galway County Council Roads Dept. Correspondence from Galway County Council dated 21st June 2018 states satisfaction with the submitted proposals for compliance with conditions nos. 4 and 10 of PL07.237219. It is submitted that the roads can therefore be constructed under that permission and a Commencement Notice can be submitted to Galway County Council if the subject development is permitted by the Board. Both roads will therefore be provided with Phase 1 of the proposed development and will be used for construction traffic, with access from the N67. The construction also includes a roads lighting scheme, in compliance with condition no. 15 of PL07.237219. Galway County Council states that it has recently issued a Letter of Compliance with respect to conditions nos. 4 and 10 of PL07.237219. It recommends that permission be granted subject to the construction of the link roads as part of Phase I of the development, with the east/west link to the N67 to be used for construction traffic and the north/south link to Coill Clocha to be opened when the development has been completed in its entirety.

These arrangements are acceptable in principle and I recommend that, if permission is granted, a condition is imposed requiring the construction of the proposed link roads in advance of the remainder of the development. While the concerns of the residents of Coill Clocha are noted, the north/south link at this location is an objective of the current Oranmore LAP and, as per the comment of Galway County Council, was originally envisaged under the 2000 Oranhill Area Action Plan. In addition, the access through Coill Clocha must be considered in the context of the overall road works proposed, i.e. a new link to the N67 to the east and to Oranhill to the south. The proposed roads layout is considered acceptable on this basis.

10.3.2. Pedestrian and Cycle Connections

The application includes a map of existing pedestrian and cycle connections to Oranmore town centre, also local schools, shops, etc. The main pedestrian and cyclist access route to the development will be via the Coill Clocha estate to the north of the site. This will connect to the link roads permitted under PL07.237219. The permitted layout includes pedestrian and cycle facilities on the north/south and east/west link roads. There is also a secondary pedestrian and cycle connection at the southern end of the development to the distributor road within the Oranhill development, linking to the Maree Road further to the south. I note that the proposed site layout also indicates a 'possible future pedestrian connection' at the south western corner of the site where it fronts onto the Oranhill distributor road. The provision of this connection would be very desirable as it would greatly enhance pedestrian connectivity in the area and should be required by condition if permission is granted.

The applicant submits the following proposals in relation to a new footpath on the L4103 Old Limerick Road to the north west of the development, to ensure a pedestrian connection to the centre of Oranmore and improved connections to bus stops, etc.:

- A development contribution to Galway County Council towards the development of the footpath.
- Galway County Council would enter into an agreement for the applicant to provide a footpath on their behalf.

The applicant notes that the hard shoulder on the southern side of the L4103 is at least 3 m wide and would accommodate a footpath and that correspondence from Galway Council Council confirms that the requisition of lands would not be required to facilitate the provision of a new footpath. Galway County Council have estimated that the cost of providing the footpath is less than the Part VIII threshold and therefore would not require planning permission. It requires a special financial contribution of €100,000 towards the provision of the footpath as proposed by the applicant. This proposal is acceptable and would significantly improve pedestrian facilities in the area. It may be required as a condition of permission.

10.3.3. Traffic Impacts

The application includes a Traffic and Transportation Assessment (TTA) and a Mobility Management Plan. The TTA estimates trip generation rates of 108 no. vehicular movements in the AM peak and 131 no. movements in the PM peak. The TTA states that traffic volumes on the N67 have reduced significantly since the opening of the M18 in 2017. A strategic traffic counter on the N67 between Kilcolgan and Clarinbridge previously showed AADT's of 19,470 and 16,683 for the years 2016 and 2017 respectively but has fallen to 6617 in 2018, a reduction of some 66%. The adjacent N67 and Rocklands roundabout were designed to accommodate traffic volumes prior to the opening of the M18 and therefore have substantial excess capacity for the development permitted under PL07.237219, as well as traffic generated by the proposed development. Traffic impacts are assessed as 'imperceptible' on this basis. This assessment is accepted.

10.3.4. Car and Cycle Parking

Development plan table 13.5 sets out the following car parking standards:

Development	Car Parking Standard
Dwellings/Apartments (1-3 bed)	1.5 Spaces / Dwelling (2 spaces in curtilage)
Dwellings/Apartments (4+ bed)	2 Spaces / Unit
Childcare Facilities	1 car parking space / staff member + 1 space / 4 children

The site layout states that proposed development provides the following car parking for each house type:

House Type	No. of Units	Development plan requirement	Proposed Provision
A semi-detached 4 bed	34	2 x in curtilage spaces / unit = 68 spaces	68 in curtilage spaces
B semi-detached 3 bed	54	2 x in curtilage spaces / unit = 108 spaces	108 in curtilage spaces
C detached 4 bed	10	2 spaces / unit = 20 spaces	20 in curtilage spaces
D terraced 3 bed	16	1.5 spaces / unit = 24 spaces	24 shared spaces
E semi-detached 3 bed	24	2 x in curtilage spaces / unit = 48 spaces	48 in curtilage spaces
F detached 4 bed	6	2 x in curtilage spaces / unit = 12 spaces	12 in curtilage spaces
G and H 2 bed duplex units	56	1.5 spaces / unit = 84 spaces	84 shared spaces
J terraced 2 bed	12	18	18 shared spaces
Crèche	1	25 children + 5 staff members = 11 spaces	11 spaces
Visitor parking		0	22
Total		393	415

The above figures are as per drawings nos. 2325-P-004 and 2325-P-005. I note that they do not accord with those provided in the TTA, section 6 of which states that the total provision is 383 no. spaces. The above drawings also indicate that at the northern end of the site a total of 55 no. shared spaces are provided for 28 no. house types D and J (2 / 3 bed terraced units) and 15 no. 2 bed duplex units, i.e. a total development plan requirement of 64.5 no spaces. At the southern end of the site, 45 no. shared spaces are provided for 41 no. 2 bed duplex units, i.e. a development plan requirement of 61.5 spaces. Visitor parking / shared spaces are provided elsewhere on the layout, however these would not be accessible to the terraced houses and duplex units. I note the recommendations of section 4.22 of the updated apartment guidelines:

“As a benchmark guideline for apartments in relatively peripheral, less accessible urban locations, one car parking space per unit, together with an element of visitor parking, such as one space for every 3-4 apartments, should generally be required.”

I also note national policy objective 13 of the National Planning Framework 2018:

“In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.”

The proposed car parking provision for the residential development is considered acceptable on this basis. However, the proposed crèche car park of 11 no. spaces would be inadequate to cater for an enlarged crèche as per my above recommendation. There is scope in the adjoining areas to provide additional car parking in accordance with development plan standards and this could be required as a condition of permission.

Development plan Standard 22, section (f) requires the provision of secure cycle parking facilities for residential and employment generating development, to be located in a prominent position within 30m of the facility served. The TTA states that cycle parking is to be provided at a rate of 2 spaces per terrace and duplex unit, as per section 5.7.7. of the National Cycle Manual. The site layout indicates cycle parking at various locations throughout the site. This is satisfactory.

10.3.6. Construction Traffic

As per the submitted Construction and Environmental Management Plan (CEMP), construction traffic to the development site will use the east/west link road permitted under PL07.237219 and the existing Rocklands roundabout access from the N67, therefore avoiding adjacent residential areas. The north/south link road will be constructed up to the existing estate roads but not opened for public use until the future phases of the development are progressed. Construction traffic volumes will vary during the development phases. Construction traffic impacts are assessed as ‘imperceptible negative’ overall and this evaluation is accepted.

10.3.7. Roads and Traffic Impacts Conclusion

Having regard to the above assessment, I am satisfied that the development will not result in undue adverse traffic impacts such as would warrant a refusal of permission and that any outstanding issues may be dealt with by condition. I am also satisfied that the development will achieve adequate pedestrian and cycle connections to Oranmore town centre and to the wider area, subject to conditions.

10.4. **Design and Layout**

10.4.1. Proposed Design and Layout

The development has been designed around the constraints present at the site, i.e. the roads layout permitted under PL07.237219; the flood zones along the western site periphery; the location of Moneyduff Castle in the south eastern corner of the site and its associated 20m exclusion zone and the layouts of adjoining existing and permitted residential developments. There is a single vehicular access to the entire development via a new roundabout on the north/south distributor road. The layout provides a transitional open space at this roundabout and a crescent of 2.5 storey 'Type E' houses. This is an attractive entrance to the scheme and helps to create legibility and a strong sense of place. The crèche and associated parking area are accessed via a short axial route from the main entrance, thereby avoiding drawing associated traffic through the rest of the development.

The remainder of the scheme is laid out in a series of zones that each have a distinct character. The area at the northern end of the site comprises a mix of duplex units and 2 / 3 storey terraced houses around a landscaped public open space and shared surface. There is a group of duplex types G and H at the southern eastern corner of the scheme, providing an attractive frontage to the north/south distributor road and an internal courtyard. The duplex units have an innovative layout that provides active frontages on all sides, achieving passive overlooking of the central open space.

There is another crescent of large 2 storey houses around Moneyduff Castle, which is to be landscaped as detailed below. A play area to the north of the castle is accessible to both the crèche and to many of the units within the development.

Beyond the play area, the peripheral areas along the western site boundary are to be planted as wildflower meadows as a biodiversity enhancement measure, along with the area around Moneyduff Castle, to create 0.4 ha of semi-natural meadow habitat.

This habitat is to be cut once or twice per year to reduce sward height and allow for wildflower establishment. Existing trees and hedgerows along the site boundary will also be retained. Finally, there is a mix of detached and semi-detached houses at the south western corner of the scheme. The mix of house types creates variety, with detached houses providing active frontages to corner sites. A smaller open space in this area is well overlooked.

I consider that the proposed layout overall satisfactorily addresses the constraints and site features, while providing a good standard of public space and amenity. The open space is stated as 20.22% of the total site area, well in excess of the 15% development plan quantitative standard. The landscaping plan by Cunnane Stratton Reynolds indicates that trees and shrubs to be planted are to be native species typical of those found in the surrounding environment, as a biodiversity mitigation measure, this will achieve a high quality of public open space. Private open spaces meet or exceed development plan quantitative standards. The mix of dwelling unit types adds interest and the contemporary design language of the houses and duplex units and use of natural stone give the scheme a strong character and quality finish. The layout also provides a good standard of residential amenity as back-to-back distances meet or exceed the 22m standard and the scheme interacts satisfactorily with adjoining existing / permitted residential developments such that there would not be any significant adverse impacts on residential amenities by way of overlooking or overshadowing. Proposed boundary treatments comprise concrete post and panel fencing to rear gardens and metal railings and stone walls to front gardens / spaces. The front boundary treatments are acceptable, the rear boundaries may be amended to capped concrete block walls by condition. The layout includes adequate provision for waste storage with individual areas provided in front of duplex and terraced housing units, which are adequately screened.

10.4.2. Internal Roads Layout

The internal roads layout has been designed to reduce vehicle speeds in accordance with the principles of DMURS with narrow road profiles, small corner radii and the use of hard surfaces and landscaping features to denote pedestrian areas and open spaces. The layout is accessible to cyclists and includes pedestrian routes through the open spaces with pedestrian crossings at appropriate locations. Vehicular permeability is more limited with many of the 'shared spaces' laid out as cul-de-sacs.

The application includes a statement of DMURS compliance and the findings of a Road Safety Audit have been incorporated into the design. The roads layout provides a clear hierarchy and is acceptable overall with regard to DMURS. I consider that the development achieves a good level of connectivity to surrounding residential areas and the provision of a new footpath on the L4103 will improve connectivity of the area to Oranmore town centre. However the achievement of an additional pedestrian connection at the south western corner of the site would be desirable, as discussed above.

10.4.3. Quality of Residential Accommodation

The house types all provide a high standard of residential accommodation in terms of floor plans and private open space provision. The duplex units have been designed to comply with the 'Sustainable Urban Housing Design Standards for New Apartments' and the floor areas meet or exceed the required provision in all instances. A Building Lifecycle Report is submitted. This includes proposals for the ongoing maintenance of communal areas including a property management company. I am satisfied that the development will provide a high standard of residential accommodation.

10.4.4. Design and Layout Conclusion

To conclude, I consider that the design and layout of the development are generally satisfactory with regard to national and development plan guidance for residential development and that there is a reasonable standard of residential accommodation for future residents of the scheme.

10.5. **Landscape and Visual Impacts**

10.5.1. The site is located in 'Landscape Character Area (LCA) 13 – East Galway Bay (Oranmore to Kinvarra Bay and inland to N18 road)', as per the *Landscape and Landscape Character Assessment for County Galway*, published by Galway County Council in 2002 and adopted into the current County Development Plan. This is assessed as an area of high landscape value. The development plan map 'Landscape Sensitivity and Character Areas – LCM2' classifies the landscape sensitivity of the area as 'Class 3 – Medium' with a coastal edge of 'Class 4 – Special'. The landscape character assessment describes LCA 13 as follows:

“The coastline is intimate and sinuous with many sheltered inlets. The coast is scenic and relatively undeveloped. The landscape adjacent to the coast comprises pastureland in large fields bordered by mature hedgerows. The existing vegetation screens the coastline from roads and properties inland of the N18 road.”

The Landscape Character Assessment includes the following recommendations for LCA 13:

3.36 The sinuous coastline is scenic and is relatively undeveloped. It is therefore highly sensitive. Future development should therefore be located further inland in order to protect this coastline and the panoramic views to be gained from it.

3.37 In general, groups of dwellings or holiday homes should be located further inland within the area indicated as class 3 on the landscape sensitivity map. These developments are to be located close to existing settlements. As in other areas, advantage is to be taken of both landform and existing vegetation to carefully conceal these developments from view.

There are no designated focal points or views within a 5 km radius of the development site. There are two designated views in the wider area, within 5.1 and 7.4 km of the site, the development would not be visible from either of these. The development will be visible from the Oranmore Slí walking route along the Maree Road, c. 280m to the east of the site. Development plan objective RA6 applies:

“Prohibit the intrusion of development along public walking routes and public rights of way, particularly those in scenic areas, the sea coast and along inland waterways.”

The development will also be visible from the Wild Atlantic Way at the N67 to the east and the Maree Road to the west.

10.5.2. I note the LVIA included in EIAR chapter 10. It considers visual impacts from 7 no. vantage points within a 2 km radius of the development site, including the adjoining residential areas of Orancourt, Oranhill, the Maree Road, Coill Clocha and the N67, and concludes that it will have a neutral / negative, slight to moderate and permanent landscape impact overall on the adjoining public roads and residential areas. Having inspected the site and viewed it from a variety of locations in the area, I am satisfied that visual impacts would be localised and generally limited to the adjoining

residential areas, the N67 and the Maree Road. Views from the Maree Road will be offset by the intervening undeveloped lands and the presence of landscaping along the western site margins. Views from the N67 will eventually be obliterated by the permitted development to the immediate east of the site. Due to the low profile of the development and to its location contiguous to existing and permitted residential schemes, I am satisfied that the development will read as a continuation of the built up area of Oranmore in views from the wider area. I also note that the site is well set back from the shore, beyond existing housing and the Maree road, and therefore will have no significant impact on coastline views, as per the recommendations of the Landscape Character Assessment. The potential landscape and visual impacts are considered acceptable on this basis.

10.6. Impacts on Moneyduff Castle

10.6.1. Potential cultural heritage impacts primarily relate to impacts on the setting of Moneyduff Castle (RMP no. GA095-084), the remains of which are located on a mound on top of a rocky outcrop at the south eastern corner of the development site. Little is known of the history of the castle and the origin and occupation of the site are not known. The information provided with the application states that it most likely formed part of a wider group of castles in the barony of Dunkellin, connected by their similarities in their dates and construction, also that the castle is recorded as the seat of David Ballagh and Slíghe Tybacht in 1574. It is possible that the site was a tower house, but it is not possible to classify the castle solely based on the current remains, which may be of more recent date. The remains are an overgrown, rectangular area with some mortared rubble walls. Some of the collapsed fabric of the building is likely to remain, along with potential sub-surface archaeological features, deposits or artefacts in the immediate vicinity. There is evidence of attempts at the consolidation of the castle through the addition of what is most likely mid 20th century cementitious mortar. It is unclear if features possibly associated with the castle, such as a bawn wall or other functional buildings, were constructed in the vicinity. The archaeological investigations carried out at the site identified 2 no. features of possible archaeological significance, suggesting that sub-surface archaeological features may be present within the development site. The testing did not reveal any structural remains.

- 10.6.2. A Conservation Management Plan for the castle is submitted as EIAR Appendix 11-2, prepared by an archaeologist and a historic buildings consultant. This assesses the significance of the castle as (i) its historic value to the area and (ii) its place in the local community. The plan proposes the removal of existing vegetation at the castle, the conservation of the structural remains and the landscaping of the rocky mound on which the castle stands. This would allow safe public access to the castle. Signage providing information on the historical significance of the castle is to be provided. It is submitted that the castle is currently physically vulnerable and likely to deteriorate further if left in its current condition. The submitted CEMP sets out measures to protect the castle during construction, including fencing off the 20m exclusion zone.
- 10.6.3. I consider that the proposed measures to protect and enhance the setting of the castle are appropriate and that, subject to conditions including archaeological monitoring during construction, the development will not have a significant adverse impact on the archaeological resource of the area.

10.7. **Drainage, Flood Risk and Site Services**

10.7.1. Surface Water Drainage and Flood Risk

The site does not contain any natural watercourses or field drains and it is likely that much of the rainfall that reaches it drains through the soils. Rainfall data and the predominant well-draining mineral soils and relatively flat ground indicate that the site is characterised by low surface water runoff rates and high groundwater recharge rates. The site is generally dry but has some waterlogged areas. The presence of areas of rock-based fill influence the direction of runoff to some extent but the natural topography of the site underlying the fill is sloping from higher land to the east to lower land to the west. Due to proximity to the coast, all drainage from the site will ultimately end up in Oranmore Bay. The Millpot stream drains lands to the immediate west, also discharging to Oranmore Bay. That area is peaty, poorly drained and wet underfoot. It is separated from the development site by a stone wall. The Site Specific Flood Risk Assessment (SSFRA) by Hydro-Environmental Services submitted therefore identifies potential for coastal flooding as the key flood risk issue at the development site. The OPW PFRA map indicates that areas of the western part of the development site are within the indicative 200 year coastal flood

zone (Flood Zone A) and 1,000 year coastal flood zone (Flood Zone B). This is due to proximity to Oranmore Bay and the flat profile of lands between the development site and the sea. The LAP land use zonings are based on the PFRA maps, however they have been superseded by more accurate CFRAM mapping. The CFRAM mapping indicates that large sections of lands to the west of the site are within the 10-year tidal flood event, however the development site is outside this zone due to higher ground levels. There are no areas within the development site in Flood Zones A or B. The entire development site is therefore entirely within Flood Zone C, in accordance with the sequential approach set out in 'The Planning System and Flood Risk Management, Guidelines for Planning Authorities'. No instances of historic flooding at the development site are identified in OS maps and there are no instances of recurring flooding in relevant OPW flood maps. The site survey found depressions in the west of the site that are prone to fluvial flooding. These are to be developed as open space within the development.

The proposed housing layout therefore ensures that vulnerable development is outside flood zones as per LAP and CFRAM maps. Minimum floor levels are set above > 5.1 m O.D. This includes allowances for tolerances in completed PFRA, CFRAM / ICPSS modelling and predicted sea level rise due to climate change and also includes an additional freeboard of 0.3m. The development therefore includes allowances for predicted sea level variations over its intended lifetime. In addition, the wastewater pumping station within the development is a sealed underground tank and therefore would not be affected by any tidal flooding.

The SSFRA concludes that the site is not constrained by coastal flooding and that there is no pluvial, groundwater or fluvial flood risk associated with the site, also that the proposed storm water drainage system will adequately cater for surface runoff from the development. In addition, the development does not include any structures that would affect surface water flows or result in increased flood risk. The proposed storm water drainage system will discharge via an oil / petrol interceptor to a total of 5 no. soakaways situated in the centre, north and west of the site. Stormwater design calculations are provided, which are based on a 30 year return period plus an additional 10% climate change allowance. The soakaways will discharge to groundwater. This is acceptable with regard to the findings of the SSFRA.

10.7.2. Foul Drainage and Water Supply

Wastewater from the development is to drain via gravity to a pumping station on the western side of the site, then discharge via a rising main to an existing foul sewer at the entrance to Coill Clocha. The development will also connect to an existing watermain at this location. The Coill Clocha estate road has been taken in charge by Galway County Council. The applicant has obtained a letter of consent from same to allow connection to the Irish Water foul sewer and watermain over the estate road. I note the Irish Water correspondence on file, which states that existing Irish Water water and wastewater infrastructure has the capacity to cater for the development and that no wastewater treatment upgrades are required. The proposed water supply and foul water treatment arrangements are acceptable on this basis.

10.7.3. Drainage, Flood Risk and Site Services Conclusion

Having regard to the above, I consider that the development can be facilitated by existing Irish Water infrastructure and that the proposed surface water drainage arrangements are acceptable. I also note and accept the findings of the SSFRA, such that the development will not impinge on Flood Zone A or B and will not result in additional flood risk. The proposed foul drainage and water supply arrangements are satisfactory.

10.8. **Part V**

10.8.1. The applicant has submitted Part V proposals comprising the transfer of 21 no. units at the site to the planning authority comprising 12 no. 2 bed apartments, 3 no. 2 bed terraced houses and 6 no. 3 bed terraced / semi-detached houses. A schedule of estimated costs has been submitted and details of the numbers of units to be transferred at each phase of the scheme. I note the third party comments regarding the location of the Part V units within the development. However, Galway County Council is satisfied that the proposed social housing units and costings meet the requirements of the Planning and Development Act 2000, as amended, and that the locations of the proposed units within the development promote social integration. I therefore recommend that a condition requiring a Part V agreement is imposed in the event of permission being granted.

10.9. Planning Assessment Conclusion

- 10.9.1. The development is acceptable in principle with regard to the Galway County Development Plan 2015-2021 and the Oranmore Local Area Plan 2012-2022. The proposed design and layout are satisfactory with regard to the creation of a high quality residential environment, to meeting LAP roads objectives TI 24 and 25 and to achieving adequate pedestrian and cycle connections. The development is also considered to be compliant with the Design Manual for Urban Roads and Streets. I am satisfied that the development would not have significant adverse impacts on visual or residential amenities such as would warrant a refusal of permission. The development provides for the adequate protection of Moneyduff Castle (RMP no. GA095-084) and would not have a significant adverse impact on the archaeological resource of the area. The proposed surface water and wastewater drainage arrangements are satisfactory and the comments of Irish Water regarding connection to water and foul infrastructure are noted. I am also satisfied with regard to the submitted Site Specific Flood Risk Assessment that the site is not constrained by coastal flooding and that the proposed residential development is entirely within Flood Zone C and is therefore acceptable with regard to flood risk. The submitted Part V proposals are in accordance with the requirements of the planning authority for same.
- 10.9.2. However, having regard to the EIAR assessment of impacts on flora and fauna and to the comments of the Dept. of Culture, Heritage and the Gaeltacht, and given the presence of several Natura 2000 designated sites in the wider area, including the Galway Bay Complex SAC (site code 000268) and pNHA, the Inner Galway Bay SPA (site code 04031) and Cregganna Marsh SPA (site code 004142) and NHA, all in close proximity to the development site, along with the presence of Annex I habitat, Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (*important orchid sites) [6210] at the development site, it is considered that there is insufficient information available to enable the Board to carry out a robust assessment of potential impacts on flora and fauna and corresponding impacts on designated sites. In addition, having regard to the information provided with the application, including the Natura Impact Statement, I am not satisfied that the proposed development either individually or in combination with other plans or projects, would not be likely to have a significant effect on the Galway Bay Complex

SAC (000268), Inner Galway SPA (04031), Cregganna Marsh SPA (004142) and Rahasane Turlough SPA (000322), in view of the sites' Conservation Objectives.

11.0 Environmental Impact Assessment

11.1. EIA Statutory Provisions

11.1.1. This application was submitted to the Board after 16th May 2017, the date for transposition of Directive 2014/52/EU amending the 2011 EIA Directive. The European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 transpose the requirements of Directive 2011/52/EU into Irish planning law. Circular Letter PL 05/2018, dated 24th August 2018 states:

“Article 2 of the 2018 Regulations: The new Regulations transposing Directive 2014/52/EC come into effect on 1 September 2018 in respect of development consent applications requiring EIA made on or after that date (save for specific provisions below which come into effect on 1 January 2019).”

The ‘specific provisions’ referred to relate to the introduction of applications for screening for EIA in advance of making a planning application under sections 176A to 176C of the Planning and Development Act 2000 as provided for in the Planning and Development (Housing) and Residential Tenancies Act 2016. This matter is to be the subject of a further Circular Letter and is not relevant to the subject case. The requirements of the 2018 Regulations thus do not apply to the subject case, which was lodged on 27th June 2018. I therefore propose to apply the provisions of Circular Letter PL 1/2017, dated 15th May 2017, which applied prior to the 2018 Regulations and set out transitional arrangements in advance of the commencement of transposing legislation. The Board may wish to seek legal advice on this matter.

11.1.2. Item 10(b) of Part 2 of Schedule 5 of the Planning and Development Regulations 2001 and section 172(1)(a) of the Planning and Development Act 2000 (as amended) provide that an EIA is required for infrastructure projects comprising of urban development which would exceed:

- 500 dwellings
- an area of 2 ha in the case of a business district, 10 ha in the case of other parts of a built-up area and 20 ha elsewhere.

The development involves a total of 212 residential units and the site has a stated area of 8.7 ha, located in a built-up area. It therefore falls below the above thresholds and does not require mandatory EIA. EIAR section 1.4 provides the applicant's rationale for sub-threshold EIA with regard to the criteria set out in Schedule 7 of the Planning and Development Regulations 2001 (as amended), due to its nature, size and location close to an environmentally sensitive area, i.e. the Galway Bay Complex SAC (site code 000268). I concur with this assessment having regard to the location of the development site adjoining the Galway Bay Complex SAC (site code 000268) and proposed Natural Heritage Area (pNHA) and in close proximity to the Inner Galway Bay SPA (site code 04031) and Cregganna Marsh SPA (site code 004142) and NHA (site code 000253). As per article 102 of the 2001 Regulations, a planning application for sub-threshold development accompanied by an EIAR shall be dealt with as if the EIAR had been submitted in accordance with section 172(1) of the Act of 2000.

11.1.3. The EIAR is laid out in one volume including a non-technical summary. The introductory chapters establish the context of development and describe the proposal in detail, including construction and phasing. The adjoining access roads are included in the description of the proposed development. The EIAR considers cumulative impacts including several permitted developments in the vicinity, ref. PL07.246315, PL07.237219, PL07.237409, Reg. Ref. 17/1268. The strategic need for the development is outlined in the context of the zoning of the site and national and local planning policy. Chapter 1 provides details of the competent experts that carried out the assessments in each chapter. Chapter 13 considers interactions but does not provide a summary of mitigation measures. The likely significant direct and indirect effects are considered under the following headings, after those set out in Article 3 of the EIA Directive 2014/52/EU:

- Human beings, population and human health
- Biodiversity, flora and fauna
- Land, soils and geology
- Hydrology and hydrogeology
- Air and climate

- Noise and vibration
- Landscape and visual
- Archaeology and cultural heritage
- Material assets

11.1.4. I am satisfied that the information contained in the EIAR has been prepared by competent experts and generally complies with article 94 of the Planning and Development Regulations 2000, as amended, and the provisions of Article 5 of the EIA Directive 2014. However, there are identified deficiencies in the survey data on which the Biodiversity, Flora and Fauna chapter is based. This matter is discussed in detail below.

11.1.5. I have carried out an examination of the information presented by the applicant, including the EIAR, and the submissions made during the course of the application. A summary of the results of the submissions made by the planning authority, prescribed bodies and observers has been set out at sections 7.0, 8.0 and 9.0 of this report.

11.1.6. This EIA has had regard to the application documentation, including the EIAR, the observations received and the planning assessment completed in Section 10.0 above.

11.2. Alternatives

11.2.1. Article 5(1)(d) of the 2014 EIA Directive requires the following:

“a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, taking into account the effects of the project on the environment.”

Annex IV (Information for the EIAR) provides more detail on ‘reasonable alternatives’:

“2. A description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of

the main reasons for selecting the chosen option, including a comparison of the environmental effects.”

11.2.2. The submitted EIAR does not include any specific consideration of alternatives. It is reasonable that alternative sites would not be considered given the LAP zoning of the site for residential development, which underwent SEA. I note that EIAR chapter 3, along with other documentation submitted by the applicant, provide a detailed rationale for the design and layout of the proposed development with regard to site constraints including roads access; proximity to the Galway Bay pNHA and several European sites; the presence of the recorded monument GA 095-084 and adjoining permitted development. As noted in the planning authority submission, the development has emerged from an iterative process including section 247 discussions with Galway County Council and the section 5 pre-application consultation process with ABP, details of which are on file. It is therefore considered that the issue of alternatives has been adequately addressed in the application documentation, which is to be considered by ABP as the competent authority in the EIA process.

11.3. **Likely Significant Direct and Indirect Effects**

11.3.1. Population and Human Health

The site adjoins established residential areas and permitted residential developments. The nearest existing occupied dwelling is c. 30m from the northern site boundary. The population of the Clarinbridge and Oranmore EDs grew by 55% in the period 2006-2011 and 3.3 % in the period 2011-2016. The rate of population growth was much higher than that recorded for the state in the 2011-2016 period. Aside from the built up area, local land use is dominated by agriculture and tourism. There are 3 no. primary schools and one secondary school within 1 km of the site as well as various amenities and sports clubs in the Oranmore, Clarinbridge and Carnmore area. The proposed development would provide accommodation for 594 persons, based on the average size of household in the county, which is 2.8 persons. Potential significant impacts relate to health and safety, traffic, noise, dust and air quality during the construction phase and impacts associated with employment, population, land use and economic activity. There are slight / imperceptible short term negative impacts during construction associated with noise,

dust and air quality and traffic, proposed mitigation measures are outlined in relevant chapters, no significant residual impacts. No significant residual impacts on health and safety, employment and investment, population, tourism or land use. There is a potential long term slight negative traffic impact. There are no significant impacts associated with vulnerability of the project to natural disaster. No significant cumulative impacts are envisaged.

I have considered all of the written submissions made in relation to population and human health. I am satisfied that they have been appropriately addressed in terms of the application and the information submitted by the applicant and that no significant adverse direct, indirect or cumulative effects on population and human health are likely to arise.

11.3.2. Biodiversity: Flora and Fauna

The biodiversity chapter of the EIAR has been prepared by competent experts with details of relevant credentials supplied. It is based on ecological walkover surveys of the site on the 8th September 2016 and the 16th August 2017, including a search for non-native invasive species, supplemented by other sources of data / information including breeding and wintering bird atlases; Bat Conservation Ireland database, the National Biodiversity Centre web mapper; Inland Fisheries Ireland reports, NPWS records including specially requested records from the NPWS Rare and Protected Species Database for the hectads in which the proposed development is located.

The eastern section of the site is predominantly overgrown by scrub species, interspersed by habitats classified as dry calcareous and natural grassland on thin soils with some bare limestone rock visible in parts. The Annex I habitat 'semi-natural dry grasslands (Festuco-Brometalia) (*important orchid sites) [6210]' is present at the development site. This habitat is listed as a Qualifying Interest of the adjoining Galway Bay Complex SAC (000268). A total of 9 discrete mappable areas of the habitat type were identified within the site in the 2016-2017 survey period, equating to approx. 0.89 ha or 10.3% of the development area. These areas occur in disjointed patches which are threatened by scrub encroachment. Given the nature and extent of scrub encroachment surrounding the smaller areas, most are not considered to be 'viable areas' of Annex I habitat and are therefore considered to be

of local importance (higher value). There are 2 'viable areas' of Annex I habitat comprising a total of 0.51 ha at the development site. The south west portion of the site comprises dry grassland. A small area within the northern part of the site, that will form part of the site access road, comprises of spoil and bare ground. No invasive species were recorded at the site. The habitats outside the site boundary, in the wider area, comprise built land, semi-improved agricultural pasture hedgerows, treelines and degraded poor fen. The fen habitat to the west of the site has been degraded by grazing and artificial drainage. It is likely that this has reduced its suitability for usage by wintering waterfowl.

The field surveys found no evidence of protected faunal species or species of conservation concern. The habitats within the site, in particular hedgerows and treelines, are likely to provide suitable commuting and foraging habitat for bat species in the wider area. However, no suitable structures or features for roosting bats were located within the site.

The primary potential impacts identified in the EIAR are as follows:

- Short term moderate negative impact associated with loss of scrub, hedgerow and grassland habitats.
- Permanent slight negative impact associated with loss of 0.51 ha of 'viable' Annex I habitat classified as habitat of local importance (higher value).
- Long term neutral impacts relating to disturbance and habitat loss of faunal species.
- No predicted impacts on habitats outside the site boundary.
- Short term neutral impact on designated sites during the construction phase, associated with impacts on soils and water quality. The nearest NHA, Cregganna Marsh NHA, is situated 0.26 km to the south of the site and is separated from the site by an existing housing estate and agricultural grassland.
- There are not believed to be any existing stands of invasive species at the site.
- No significant cumulative impacts are predicted.

Proposed mitigation measures include landscaping with biodiversity enhancement measures such as the use of native species to create a total of 0.4 ha of semi-

natural meadow habitat. The submitted CEMP includes control measures for the management of invasive species.

I note the comments of the Department of Culture, Heritage and the Gaeltacht (DoCHG) in relation to the Biodiversity chapter of the EIAR, in particular the following points:

- The Biodiversity chapter describes the baseline environment based on a walkover survey and a desktop study and the focus is primarily on habitats occurring with the development site. Information on fauna arising from surveys is lacking.
- The site was originally rocky and, when surveyed for the NPWS in 2006, supported a mosaic of species-rich calcareous heath (including Juniper), calcareous grassland and rocky outcrops, as well as some disturbed ground. Scrub clearance and ground excavations have occurred from c. 2005 onwards and there is evidence of past areas of water-worn limestone rock on the site (now stored / disposed on lower ground in the southern end of the site). More recently, substantial excavations (which may constitute development) have taken place in connection with archaeological testing. Despite these disturbances, the site is species – rich and diverse, and supports a mosaic of open calcareous grassland and herbaceous communities of open / disturbed ground, and developing mixed scrub and woodland where soil cover is thin or absent. Lower areas fringing the SAC have deeper soils and there are indications of poor drainage and waterlogging.

The DoCHG comments that the following should be included among the Board's considerations:

1. The size of the site (8.7ha), and area of natural and semi-natural habitats present (and which will be lost);
2. The presence of the Annex I habitat, 'Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (*important orchid sites) [6210]', outside a European site, and noting that this habitat is more extensive than indicated in Figure 5.4 of the EIAR. Note it would be appropriate to evaluate the significance of the losses of this habitat in the context of its national conservation status;

3. The potential presence of rare and legally protected (Flora (Protection) Order, 2015) plant species, noting the type of habitats present, and the limited information available in relation to vegetation communities and flora of the site;
4. The potential presence of legally protected species of fauna, noting the extent of scrub cover on the site, and the limited species surveys undertaken (e.g. no bat surveys);
5. The value of the site for invertebrate communities and pollinators, e.g. butterflies and bees;
6. Cumulative effects, including the combined losses of limestone pavement and other rocky calcareous habitats in the wider Oranmore area over recent decades;
7. The extent to which the biodiversity losses will be consistent with or will contravene objectives and policies of Galway County Development Plan and Oranmore LAP in relation to the conservation and protection of the natural heritage of the plan areas.

As per section 3.6.2 of the EPA 'Draft Guidelines on Environmental Impact Assessment' (August 2017):

"The need for site specific and up-to-date data is to be reviewed on a case-by-case basis in the context of available data and to determine whether new surveys or research are required."

And:

"The description of any aspect of the environment should provide sufficient data to facilitate the identification and evaluation of the likely significant effects on that topic. Systematic, accurate and comprehensive descriptions include descriptions of the context, character, significance and sensitivity of the existing environment."

I note section 4.3 'Biodiversity' of the draft EPA 'Advice Notes for Preparing Environmental Impact Statements' (September 2015), which recommends that seasonal variations will need to be considered when investigating the existing environment and deciding on appropriate methods of survey. As discussed above, the Biodiversity chapter of the EIAR is based on desktop data and on ecological walkover surveys of the site on the 8th September 2016 and the 16th August 2017. This does not allow for any seasonal variations in the flora and fauna present at the

development site. I note in this regard the following comment in the submission by Galway County Council with regard to the presence of Annex I habitat and the potential presence of rare and legally protected plant species at the development site:

“Since the site was originally surveyed by the NPWS in 2006, the site has been subject to scrub clearance, soil movement and grazing by horses. This has altered the extent and character of the habitats on the site and reduced the area of Annex I calcareous habitat within the site. As identified during the desk study, small white orchid (Pseudorchis Albida) has been recorded within the hectad in which the site is located. However, this species was not recorded during the 2016 or 2017 field visits.”

Having regard to the comment of the DoCHG above and to the limited survey data available, it appears that the exact extent of the Annex I habitat at the development site is unclear, in particular with regard to the uncertainty around the presence of orchid species (the Annex I habitat is considered a priority habitat only if it is an important orchid site). On this basis, I consider that the submitted EIAR does not allow for a full assessment of potential impacts on the Annex I habitat.

I note that the EIAR section 5.4 states that no bat surveys were undertaken at the site as no suitable structures or features for roosting bats were located within the site. I also note that the development involves the retention of hedgerow and treeline features where possible as a mitigation measure, in order to ensure connectivity is maintained for commuting and feeding faunal species including birds, bats and invertebrates. I am satisfied on this basis that the development will not have significant adverse impacts on bats.

With regard to the value of the site for invertebrate communities and pollinators, e.g. butterflies and bees, any development at this site will result in some loss of habitat for same and I note that the development includes the creation of areas of wildflower meadow as a mitigation measure.

With regard to cumulative effects including the combined losses of limestone pavement and other rocky calcareous habits in the wider Oranmore area over the recent decades, EIAR section 5.5.6 includes cumulative impacts and finds that the development will not result in any significant residual cumulative impacts on sensitive ecological receptors. However, as noted above this is based on limited survey data

and in the context of uncertainty around the extent of Annex I habitat at the development site.

I have considered all of the written submissions made in relation to biodiversity. Having regard to the limited survey data on which the Biodiversity assessment is based, I am not satisfied that the identified impacts on biodiversity would be avoided, managed and mitigated by the measures which form part of the proposed scheme, or through suitable conditions. I am, therefore, not satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of biodiversity.

11.3.3. Land, Soils and Geology

This chapter and that on water impacts are based on site investigations carried out on 5th January 2018. The site is dominated by shallow, well drained mineral soils and shallow, rocky, peaty complexes. The majority of the site is underlain by karstified limestone bedrock outcrop / subcrop with some areas of raised peat in the southwest of the site. There are no recorded geological heritage sites or areas of soil contamination within the site. Potential impacts relate to the alteration of ground levels with soils / subsoil excavation. Cut and fill works at the site will be neutral as material will be reused on site resulting in a permanent relation of soil and subsoil at most excavation locations. There will be a requirement for c. 20,000 m³ of aggregate for building works. There is potential for soil contamination as a result of leakages and spillages including hydrocarbons. Proposed mitigation measures are outlined for the construction phase. No significant residual or cumulative impacts are predicted.

I have considered all of the written submissions made in relation to land and soils. I am satisfied that the identified impacts would be avoided, managed and mitigated by the measures which form part of proposed scheme, the proposed mitigation measures and through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of land and soils.

11.3.4. Hydrology and Hydrogeology

The hydrological mapping of the site and surrounding area is based on site investigations carried out on 5th January 2018. A flood risk assessment has also been carried out. The surface water characteristics of the site and flood risk are

discussed in above section 10.7. There is a high degree of interaction between surface and groundwater at the site due to the presence of permeable, karstified limestone. Groundwater flow is through conduit systems, generally in a westerly direction. There is a Regionally Important limestone aquifer under the site. The groundwater vulnerability rating is 'extreme' due to the presence of rock at or near the surface. The Clarinbridge groundwater body underlying the site has an 'at risk' status. There are no groundwater protection zones or mapped private well locations within the site.

Potential impacts on water quality generally relate to surface water impacts during construction as a result of contamination / spillages and the release of suspended solids, also short term impacts on surface and groundwater as a result of dewatering. Proposed construction mitigation measures are outlined, to ensure protection of downstream receiving waters and groundwater. As outlined in above section 10.7, surface water runoff from the development is to be attenuated such that there are no changes to surface water flow volumes leaving the site. Water draining to soakaways will pass through hydrocarbon interceptors and silt traps prior to reaching each soakaway. Foul drainage is to the public network (Irish Water). No significant residual or cumulative impacts on surface or ground water from the construction or operation of the development are predicted.

I have considered all of the written submissions made in relation to hydrology and hydrogeology. I am satisfied that the identified impacts would be avoided, managed and mitigated by the measures which form part of proposed scheme, the proposed mitigation measures and through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of hydrology and hydrogeology.

11.3.5. Air and Climate

11.3.6. The air quality in the vicinity of the development is typical of that in rural areas of the west of Ireland, EPA Air Quality Zone D. The area has a temperate oceanic climate with mild winters and cool summers and a prevailing wind direction between south and west, bringing moist air and frequent rain. Potential air quality impacts primarily relate to fugitive dust and combustion gas emissions during construction. Mitigation measures comprise construction management measures. Impacts are anticipated to

be imperceptible. No long term cumulative impacts on air quality are predicted. No significant climate impacts are predicted.

I have considered all of the written submissions made in relation to air quality and climate. I am satisfied that the identified impacts would be avoided, managed and mitigated by the measures which form part of proposed scheme, the proposed mitigation measures and through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of air quality and climate.

11.3.7. Noise and Vibration

The EIAR assessment of noise impacts is based on daytime noise monitoring carried out at 3 residential locations north and south of the site on 31st May 2018. The existing noise climate in the area is generally dominated by road traffic. Vibration was not perceptible.

Potential noise impacts during the 4 year construction phase relate to site works and construction machinery, resulting in slight to moderate impacts. Construction noise modelling indicates that the *British Standard BS 5228;2009+A1:2014* construction day time criterion of 65 dB LAeq 1 h can typically be complied with during enabling and construction works without noise attenuation measures, except for one instance of excavation works at the northern site boundary where noise levels will marginally exceed the criterion. Proposed mitigation measures are outlined. Construction traffic will not pass existing dwellings and will be inconsequential in the context of existing road traffic in the area. Any cumulative impacts would be as a result of other sites in the area simultaneously being developed and would be temporary, localised and imperceptible. No adverse noise impact on the local population or on human health is predicted. No significant vibration impacts are predicted as the development will not involve blasting or piling and only small amounts of rock breaking.

I have considered all of the written submissions made in relation to noise and vibration. I am satisfied that the identified impacts would be avoided, managed and mitigated by the measures which form part of proposed scheme, the proposed mitigation measures and through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of noise or vibration.

11.3.8. Landscape and Visual

The Board is referred to section 10.5 above in respect of landscape and visual impacts.

The LVIA considers visual impacts from 7 no. vantage points within a 2 km radius of the development site, including the adjoining residential areas of Orancourt, Oranhill, the Maree Road, Coill Clocha and the N67. I am satisfied that the viewpoints selected allow for an adequate assessment of overall visual impacts.

The development site is currently well screened from the surrounding area. The development will have a neutral / negative, slight to moderate and permanent landscape impact overall on the adjoining public roads and residential areas. Proposed mitigation measures comprise construction management measures, the retention of existing trees and boundaries and the landscaping scheme. No significant or profound residual landscape or visual impacts are identified in the long term. Cumulative impacts are possible in view of other zoned lands nearby and the ongoing development of the area.

I note that the submitted LVIA does not include photomontages of the proposed development and may be considered deficient in this respect. However, having inspected the site, I am satisfied that visual impacts would be localised and that the development would read as a continuation of the built up area of Oranmore in the wider landscape. The submitted LVIA is therefore considered adequate.

I have considered all of the written submissions made in relation to landscape and visual impact. I am satisfied that the identified impacts would be avoided, managed and mitigated by the measures which form part of the proposed scheme, the proposed mitigation measures and through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect landscape and visual impacts.

11.3.9. Archaeology and Cultural Heritage

The Board is referred to section 10.6 above in relation to impacts on Moneyduff Castle (RMP no. GA095-084)

This chapter of the EIAR is based on a walkover survey of the site carried out on 2nd November 2017 and subsequent pre-development testing at the site between 26th

and 29th March 2018. A report on the findings of the archaeological testing is submitted as EIAR appendix 11-1.

The EIAR lists 29 no. Recorded Monuments within 1 km of the development. Of these, 7 are not scheduled for inclusion in the next revision of the RMP. Of the remaining 22, none are within 100m of the development site. A large area of the northern part of the development site has been subject to field clearance with levels reduced, removing any potential archaeological features and / or deposits. The western half of the southern part of the site appears to be undisturbed and may contain sub-surface archaeological features, deposits and / or artefacts associated with Moneyduff Castle. The archaeological testing found 2 no. features of possible archaeological significance, suggesting that potential sub-surface archaeological features may survive within the development site. A midden was found at Trench A in the south western corner of the site and an area of burnt soil at Trench I to the south of Moneyduff Castle. It is not possible to date these features without full excavation and these areas should be archaeologically resolved prior to the development of the site. There are 15 no. protected structures within 1 km of the site, the closest of which, 'Roseville House' (RPS no. 920) is c. 300m away.

The EIAR rates the significance of the impacts on cultural heritage as moderate, due to the visual impact on the Moneyduff Castle Recorded Monument. The development should have no impact on the cultural heritage of the wider area given the distance to protected structures and other recorded monuments. The proposed mitigation measure is an exclusion zone of 20m, implementation of a conservation and management plan, archaeological monitoring during construction and excavation of the features of potential archaeological significance prior to development. Residual impacts are assessed as not significant.

I have considered all of the written submissions made in relation to cultural heritage. I am satisfied that the identified impacts would be avoided, managed and mitigated by the measures which form part of the proposed scheme, the proposed mitigation measures and through suitable conditions. I am, therefore, satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of cultural heritage.

11.3.10. Material Assets Including Traffic and Transport

The Board is referred to section 10.3 above in respect of traffic and transportation.

The construction of the development will have no impact on above ground or underground telecommunications networks or other utility services. Mitigation measures to protect such services are incorporated into the Construction and Environmental Management Plan. No significant residual or cumulative impacts on telecommunications or other utilities are predicted.

I have considered all of the written submissions made in relation to material assets, traffic and transport. I am satisfied that the identified impacts would be avoided, managed and mitigated by the measures which form part of proposed scheme, the proposed mitigation measures and through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of material assets, traffic and transport.

11.3.11. Significant Interactions

I have also considered the interrelationships between factors and whether these might as a whole affect the environment, even though the effects may be acceptable on an individual basis.

EIAR Chapter 13 provides a summary of principal interactions. There are no potential significant negative interactions. It is submitted that all of the potential interactions are dealt with in the relevant individual chapters of the EIAR, which present an integrated report of findings from the impact assessment process rather than a collection of individual assessments. The development will not result in any significant cumulative or synergistic adverse impacts on the environment.

In conclusion, I am generally satisfied that effects arising can be avoided, managed and mitigated by the measures which form part of the proposed development, mitigation measures, and suitable conditions. However, having regard to the above assessment of the Biodiversity chapter of the EIAR, impacts on biodiversity cannot be clearly ruled out due to the lack of sufficient survey data on the presence of Annex I habitat at the development site.

11.4. Reasoned Conclusion on the Significant Effects

11.4.1. Having regard to the examination of environmental information contained above, and in particular to the EIAR and supplementary information provided by the developer, and the submissions from the planning authority, prescribed bodies and observers in the course of the application, it is considered that the main significant direct and indirect effects of the proposed development on the environment are as follows:

- Biodiversity impacts cannot be clearly ruled out due to the lack of sufficient survey data on the presence of Annex I habitat at the development site due to the lack of sufficient flora and fauna survey data and to the uncertainty regarding the exact extent of the Annex I habitat 'Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (*important orchid sites)' [6210] at the development site.
- Land and soils impacts, to be mitigated by construction management measures including reuse of overburden material, minimal removal of topsoil and subsoil, reuse of excess material within the site, management and maintenance of plant and machinery.
- Hydrology and hydrology impacts, to be mitigated by management of surface water run-off during construction to attenuate surface water flow and avoid uncontrolled discharge of sediment, also appropriate interceptor drainage and measures to avoid release of cement based products. Operational impacts are to be mitigated by surface water attenuation to prevent flooding.
- Landscape and visual impacts, which will be mitigated by the retention and enhancement of existing trees and hedgerows and new landscaping along the western site boundary.
- Cultural heritage impacts, which will be mitigated by a 20m exclusion zone around Moneyduff Castle (RMP no. GA095-084), by a conservation and management plan for the monument and by landscaping.
- Traffic and transportation impacts, which will be mitigated by the management of construction traffic and by the construction of the Oranmore north/south distributor road and a new east/west connection to the N67.

11.4.2. The submitted EIAR has been considered with regard to the guidance provided in the EPA documents 'Guidelines on the Information to be Contained in Environmental Impact Assessment Reports' (draft August 2017) and 'Advice Notes for Preparing Environmental Impact Statements' (draft September 2015). Although the assessments provided in many of the individual EIAR chapters are satisfactory, it is considered that the baseline surveys on which the Biodiversity: Flora and Fauna chapter are based do not allow for seasonal variations in the flora and fauna present at the development site and the exact extent of the presence of the Annex I priority habitat 'Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (*important orchid sites)' [6210] as associated potential biodiversity impacts are therefore unclear.

12.0 Appropriate Assessment

12.1. AA Introduction

12.1.1. This section of the report considers the likely significant effects of the proposal on European sites with each of the potential significant effects assessed in respect of each of the Natura 2000 sites considered to be at risk and the significance of same. The assessment is based on the submitted Natura Impact Statement (NIS), prepared by McCarthy Keville O'Sullivan Planning and Environmental Consultants.

12.2. The Project and Its Characteristics

12.2.1. See the detailed description of the proposed development in section 1.0 above.

12.3. The European Sites Likely to be Affected Stage I Screening

12.3.1. Sites Within 15km

12.3.2. The applicant's screening assessment notes the following designated sites within a 15 km radius of the development, as recommended in the DoEHLG 'Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities' (2010). Designated sites outside the 15 km buffer zone were considered but no pathway for effects on sites outside this zone were identified.

Name of Site Site Code	Distance to Development Site	Qualifying Interests and Conservation Objectives * Denotes a priority habitat	NIS Screening Conclusion
Galway Bay Complex SAC 000268	To the immediate west of the site.	The conservation objectives for the SAC relate to the maintenance of a favourable conservation condition of Annex I habitats and Annex II species. There are detailed targets for each habitat and species: 1140 Mudflats and sandflats not covered by seawater at low tide 1150 Coastal lagoons* 1160 Large shallow inlets and bays 1170 Reefs 1220 Perennial vegetation of stony banks 1310 <i>Salicornia</i> and other annuals colonising mud and sand 1330 Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>) 1355 Otter <i>Lutra lutra</i> 1365 Harbour seal <i>Phoca vitulina</i> 1410 Mediterranean salt meadows (<i>Juncetalia maritimi</i>) 3180 Turloughs* 5130 <i>Juniperus communis</i> formations on heaths or calcareous grasslands 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco Brometalia</i>) (*important orchid sites) 7210 Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i> * 7230 Alkaline fens	Screened In Taking a precautionary approach, potential pathways for indirect effects on the surface water dependent Qualifying Interests were identified. Such effects may arise as a result of deterioration of surface water quality resulting, from pollution associated with the surface water runoff from the hard-standing areas of the proposed development.
Lough Fingall Complex SAC 000606	7.3 km	The conservation objectives for the SAC generally relate to the maintenance of a favourable conservation condition of the following Annex I habitats and Annex II species: 3180 Turloughs* 4060 Alpine and Boreal heaths 5130 <i>Juniperus communis</i> formations on heaths or calcareous grasslands 6210 Semi-natural dry grasslands and scrubland facies on calcareous	Screened Out The NIS states that there will be no direct effects as the proposed development is located entirely this SAC. No complete impact source-pathway-receptor chain was identified during the Screening Assessment. Significant effects on the SAC resulting from the proposed development can be excluded and it is 'Screened Out'.

		<p>substrates (Festuco-Brometalia) (* important orchid sites)</p> <p>7210 Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i>*</p> <p>8240 Limestone pavements*</p> <p>1303 Lesser Horseshoe Bat <i>Rhinolophus hipposideros</i></p>	
<p>Lough Corrib SAC 000297</p>	8.4 km	<p>The conservation objectives for the SAC relate to the maintenance of a favourable conservation condition of Annex I habitats and Annex II species. There are detailed targets for each habitat and species:</p> <p>1029 Freshwater Pearl Mussel <i>Margaritifera margaritifera</i></p> <p>1092 White-clawed Crayfish <i>Austropotamobius pallipes</i></p> <p>1095 Sea Lamprey <i>Petromyzon marinus</i></p> <p>1096 Brook Lamprey <i>Lampetra planeri</i></p> <p>1106 Salmon <i>Salmo salar</i></p> <p>1303 Lesser Horseshoe Bat <i>Rhinolophus hipposideros</i></p> <p>1355 Otter <i>Lutra lutra</i></p> <p>1393 Slender Green Feather-moss <i>Drepanocladus vernicosus</i></p> <p>1833 Slender Naiad <i>Najas flexilis</i></p> <p>3110 Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>)</p> <p>3130 Oligotrophic to mesotrophic standing waters with vegetation of the <i>Littorelletea uniflorae</i> and/or <i>Isoeto-Nanojuncetea</i></p> <p>3140 Hard oligo-mesotrophic waters with benthic vegetation of <i>Chara</i> spp.</p> <p>3260 Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation</p> <p>6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites)</p> <p>6410 <i>Molina</i> meadows on calcareous, peaty or clayey-silt-</p>	<p>Screened Out As above.</p>

		<p>laden soils (<i>Molinion caeruleae</i>)</p> <p>7110 Active raised bogs*</p> <p>7120 Degraded raised bogs still capable of natural regeneration</p> <p>7150 Depressions on peat substrates of the Rhynchosporion</p> <p>7210 Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i>*</p> <p>7220 Petrifying springs with tufa formation (<i>Cratoneurion</i>)*</p> <p>7230 Alkaline fens</p> <p>8240 Limestone pavements*</p> <p>91A0 Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles</p> <p>91D0 Bog woodland*</p>	
<p>Rahasane Turlough SAC 000322</p>	8.9 km	<p>The conservation objectives for the SAC generally relate to the maintenance of a favourable conservation condition of the following Annex I habitat:</p> <p>3180 Turloughs*</p>	<p>Screened Out As above.</p>
<p>Castletaylor Complex SAC 000242</p>	9.6 km	<p>The conservation objectives for the SAC generally relate to the maintenance of a favourable conservation condition of the following Annex I habitats and Annex II species:</p> <p>3180 Turloughs*</p> <p>4060 Alpine and Boreal heaths</p> <p>5130 <i>Juniperus communis</i> formations on heaths or calcareous grasslands</p> <p>6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites)</p> <p>8240 Limestone pavements*</p>	<p>Screened Out As above.</p>
<p>Kiltiernan Turlough SAC 001285</p>	9.8 km	<p>The conservation objectives for the SAC generally relate to the maintenance of a favourable conservation condition of the following Annex I habitat:</p> <p>3180 Turloughs*</p>	<p>Screened Out As above.</p>
<p>Ardrahan Grassland SAC 002244</p>	10.9 km	<p>The conservation objectives for the SAC generally relate to the maintenance of a favourable conservation condition of the</p>	<p>Screened Out As above.</p>

		<p>following Annex I habitats:</p> <p>4060 Alpine and Boreal heaths</p> <p>5130 Juniperus communis formations on heaths or calcareous grasslands</p> <p>8240 Limestone pavements*</p>	
<p>East Burren Complex SAC 001926</p>	15.5 km	<p>The conservation objectives for the SAC generally relate to the maintenance of a favourable conservation condition of the following Annex I habitats and Annex II species:</p> <p>3140 Hard oligo-mesotrophic waters with benthic vegetation of Chara spp.</p> <p>3180 Turloughs*</p> <p>3260 Water courses of plain to montane levels with the Ranunculum fluitantis and Callitriche-Batrachion vegetation</p> <p>4060 Alpine and Boreal heaths</p> <p>5130 Juniperus communis formations on heaths or calcareous grasslands</p> <p>6130 Calaminarian grasslands of the Violetalia calaminariae</p> <p>6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites)</p> <p>6510 Lowland hay meadows (Alopecurus pratensis, Sanguisorba officinalis)</p> <p>7210 Calcareous fens with Cladium mariscus and species of the Caricion davallianae*</p> <p>7220 Petrifying springs with tufa formation (Cratoneurion)*</p> <p>7230 Alkaline fens</p> <p>8240 Limestone pavements*</p> <p>8310 Caves not open to the public</p> <p>91E0 Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)*</p> <p>1065 Marsh Fritillary Euphydryas aurinia</p> <p>1303 Lesser Horseshoe Bat</p>	<p>Screened Out As above.</p>

		Rhinolophus hipposideros 1355 Otter Lutra lutra	
Inner Galway Bay SPA 004031	0.34 km	<p>The conservation objectives for SPA generally relate to the maintenance of the bird species listed as Special Conservation Interests for the SPA. There are detailed targets for each species.</p> <p>A003 Great Northern Diver Gavia immer</p> <p>A017 Cormorant Phalacrocorax carbo</p> <p>A028 Grey Heron Ardea cinerea</p> <p>A046 Brent Goose Branta bernicla hrota</p> <p>A050 Wigeon Anas penelope</p> <p>A052 Teal Anas crecca</p> <p>A056 Shoveler Anas clypeata</p> <p>A069 Red-breasted Merganser Mergus serrator</p> <p>A137 Ringed Plover Charadrius hiaticula</p> <p>A140 Golden Plover Pluvialis apricaria</p> <p>A142 Lapwing Vanellus vanellus</p> <p>A149 Dunlin Calidris alpina alpina</p> <p>A157 Bar-tailed Godwit Limosa lapponica</p> <p>A160 Curlew Numenius arquata</p> <p>A162 Redshank Tringa totanus</p> <p>A169 Turnstone Arenaria interpres</p> <p>A179 Black-headed Gull Chroicocephalus ridibundus</p> <p>A182 Common Gull Larus canus</p> <p>A191 Sandwich Tern Sterna sandvicensis</p> <p>A193 Common Tern Sterna hirundo</p> <p>There is also an objective to maintain the favourable conservation condition of wetland habitat in the SPA.</p>	<p>Screened In</p> <p>The development site is located outside the SPA. No aquatic habitats suitable for the SCI species for which the SPA has been designated occurs within the site. Although there will be no direct effects on the supporting wetland (A999) habitat of waterbirds within the SPA, taking a precautionary approach, there is potential for indirect effects on supporting wetland habitat with regard to surface water pollution.</p>
Cregganna Marsh SPA 004142	0.26 km	<p>The conservation objectives for SPA generally relate to the maintenance of the bird species listed as Special Conservation</p>	<p>Screened Out</p> <p>See discussion below.</p>

		<p>Interests for the SPA.</p> <p>A395 Greenland White-fronted Goose <i>Anser albifrons flavirostris</i></p>	
<p>Rahasane Turlough SPA 004089</p>	8.8 km	<p>The conservation objectives for SPA generally relate to the maintenance of the bird species listed as Special Conservation Interests for the SPA.</p> <p>A038 Whooper Swan <i>Cygnus cygnus</i></p> <p>A050 Wigeon <i>Anas penelope</i></p> <p>A140 Golden Plover <i>Pluvialis apricaria</i></p> <p>A156 Black-tailed Godwit <i>Limosa limosa</i></p> <p>A395 Greenland White-fronted Goose <i>Anser albifrons flavirostris</i></p> <p>There is also an objective to maintain or restore the favourable conservation condition of the wetland habitat at the SPA.</p>	<p>Screened Out</p> <p>There will be no direct effects as the proposed development is located entirely outside the SPA. No complete impact source-pathway-receptor chain was identified during the Screening Assessment. Significant effects on the SPA resulting from the proposed development can be excluded and it is 'Screened Out'.</p> <p>See discussion below.</p>
<p>Lough Corrib SPA 004042</p>	10.7 km	<p>The conservation objectives for SPA generally relate to the maintenance of the bird species listed as Special Conservation Interests for the SPA.</p> <p>A051 Gadwall <i>Anas strepera</i></p> <p>A056 Shoveler <i>Anas clypeata</i></p> <p>A059 Pochard <i>Aythya ferina</i></p> <p>A061 Tufted Duck <i>Aythya fuligula</i></p> <p>A065 Common Scoter <i>Melanitta nigra</i></p> <p>A082 Hen Harrier <i>Circus cyaneus</i></p> <p>A125 Coot <i>Fulica atra</i></p> <p>A140 Golden Plover <i>Pluvialis apricaria</i></p> <p>A179 Black-headed Gull <i>Chroicocephalus ridibundus</i></p> <p>A182 Common Gull <i>Larus canus</i></p> <p>A193 Common Tern <i>Sterna hirundo</i></p> <p>A194 Arctic Tern <i>Sterna paradisaea</i></p> <p>A395 Greenland White-fronted Goose <i>Anser albifrons flavirostris</i></p> <p>There is also an objective to</p>	<p>Screened Out</p> <p>As above.</p>

		maintain or restore the favourable conservation condition of the wetland habitat at the SPA.	
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The applicant's Stage I screening identifies the following likely effects of the proposed development on European sites:

- The development site borders Galway Bay Complex SAC along its western boundary. However, there will be no land take associated with the development from the SAC. Therefore, there will be no reduction in habitat area of this or any other European site as a result of the development.
- There will be no exploitation of any resources within any European Site as part of the development.
- There is no potential for fragmentation of habitats and species as a result of the development.
- There will be no disturbance to key species associated with the development given the nature of the habitats within the adjacent European Site which are not suitable for the QI Species (otter and harbour seal). There is no potential for significant habitat or species fragmentation and significant effects are not anticipated.
- Based on the nature and extent of the proposed works no disruption to QI or SCIs of any European Sites are anticipated.
- The Inner Galway Bay SPA is located 0.34km to the west of the site and is buffered from it by a national road, urban infrastructure and grassland. No pathway for effects as a specific result of these distances was identified.
- There is a pathway for potential impacts on the water quality of the Galway Bay Complex SAC and the Galway Bay SPA during the construction phase of the development. There is also potential for effects on these sites during the operational phase the form of runoff from hardstandings, foul water discharge and noise emissions. Effects resulting from emissions to surface water during construction and operation need to be fully assessed given the nature and scale of the proposal and its proximity to Galway Bay Complex SAC and Inner Galway Bay SPA. For this reason, potential effects on the aquatic features of the SAC

and SPA cannot be screened out at this stage and further assessment is required.

- The proposed development was considered in combination with other plans and projects in the area that could result in cumulative effects on European Sites. The online planning system for Galway City Council was consulted on the 14th February 2018. A total of 15 other projects were found in the Moneyduff area within the last 10 years and comprised: 12 regarding the construction of and alterations to dwelling houses and domestic garages and 3 regarding commercial premises / residential development. Where pathways for effects on European Sites have been identified in relation to the construction and operation of the development, the potential for cumulative effects cannot be discounted at this stage and further assessment is required.

12.3.3. Applicant's Screening Conclusion

The applicant's Stage I screening conclusion notes that applying a precautionary principle, it is not possible to exclude the European Sites Galway Bay Complex SAC (000268) and Inner Galway Bay SPA (004031). It concludes that, in view of best scientific knowledge and on the basis of objective information, the proposed development either individually or in combination with other plans or projects, is not likely to have significant effects on the European Sites Lough Fingall Complex SAC (000606); Lough Corrib SAC (000297); Rahasane Turlough SAC (000322); Castletaylor Complex SAC (000242); Kiltiernan Turlough SAC (001285); Ardahan Grassland SAC (002244); East Burren Complex SAC (001926); Creggana Marsh SPA (004142); Rahasane Turlough SPA (004089) and Lough Corrib SPA (004042).

12.3.4. Creggana Marsh SPA (004142) and Rahasane Turlough SPA (004089)

The comment of the DoCHG makes the following points in relation to potential effects on the Creggana Marsh SPA (004142) and Rahasane Turlough SPA (004089) with regard to the sites' Conservation Objectives:

- The Creggana Marsh SPA is approx. 270m to the south of the proposed development and is designated for the conservation of the Annex I species Greenland White-fronted Goose, a wintering species that is highly susceptible to

disturbance from human activity. The geese that occur in Cregganna Marsh also utilise Rahasane Turlough; the importance of the former for the geese increases when water levels in the turlough are high.

- Pressures of increasing amenity and recreational activity, including dog-walking, due to increasing development and population pressure in the area, and progressive losses and fragmentation of open spaces, require particular attention, noting the potential for increased disturbance in the Cregganna Marsh SPA.

The relevant site synopses state that Cregganna Marsh is of major conservation importance as a feeding site for a nationally important flock of Greenland White-fronted Goose. Rahasane Turlough is a traditional site for Greenland White-fronted Goose and also supports a population of national importance. The Annex I species is listed as a Special Conservation Interest for both SPAs. As per the DoCHG comment, there is an inter relationship between the SPAs with regard to their use by the species.

The BirdWatch Ireland website states that the Greenland White-fronted Goose is Amber-listed in Ireland as the majority of the population winter at less than ten sites. The species has very localised distribution, occurring mostly (up to 9,000 birds) at the Wexford Slobs, with smaller numbers (usually low hundreds) elsewhere. Wexford (North & South Slobs, Tacumshin Lake & Cahore Marshes), Loughs Swilly & Foyle in County Donegal, Lough Gara in County Roscommon, Midland lakes (Loughs Derravarragh, Iron, Owel & Ennell) in County Westmeath, Little Brosna in County Offaly and River Suck/Shannonbridge in County Roscommon are the most important sites. EIAR chapter 5 Biodiversity: Flora and Fauna uses information from National Biodiversity Data Centre (NBDC) datasets and from the *Bird Atlas 2007-11: The breeding and wintering birds of Britain and Ireland* (2013) and notes that the Greenland white-fronted Goose is listed as present but not breeding in the relevant hectads in the 2007-2011 period. EIAR section 5.4 states that the site surveys did not record any EU Annex I bird species at the development site and concludes, based on findings of the desk study, the species recorded and the habitat composition, that the development site does not provide suitable habitat for protected bird species. However, as discussed above the Biodiversity: Flora and Fauna chapter of the EIAR is based on limited survey information. The BirdWatch

Ireland website states that the Greenland white-fronted Goose grazes on a range of plant material and forages over peat bogs, dune grassland, and occasionally salt marsh, with the use of agricultural grassland increasing in recent years. The habitats present at the development site, as listed in EIAR table 5.9, comprise:

- Scrub
- Dry calcareous and neutral grassland
- Hedgerow
- Stone walls and other stonework
- Spoil and bare ground
- Wet grassland

The development footprint is situated within habitats dominated by scrub and rank grassland vegetation.

On the basis of the information provided and having regard to the comments of the DoCLG, specifically (i) potential effects on the Greenland White-fronted Goose which is highly susceptible to disturbance from human activity as a result of increased amenity and recreational activity, including dog-walking; (ii) potential effects on the grazing habitat of the Greenland White-fronted Goose, which may be present at the development site, the Board cannot be satisfied that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on the European Sites Cregganna Marsh SPA (004142) and Rahasane Turlough SPA (004089), in view of the sites' Conservation Objectives. These sites therefore should be screened in and the submitted NIS is deficient in this respect. I therefore consider that the information submitted is not sufficient to allow the Board to carry out AA.

12.3.5. Stage I Screening Conclusion

12.3.6. It is reasonable to conclude on the basis of the information on file, which I consider adequate in order to issue a screening determination, that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on the following European sites, in view of their Conservation Objectives, and a Stage 2 Appropriate Assessment (and submission of a NIS) is not therefore required for the following sites:

Lough Fingall Complex SAC (000606)

Lough Corrib SAC (000297)
Castletaylor Complex SAC (000242)
Kiltiernan Tulough SAC (001285)
Ardrahan Grassland SAC (002244)
East Burren Complex SAC (001926)
Inner Galway Bay SPA (004031)
Lough Corrib SPA (004042)

12.3.7. The following European sites are screened in with regard to potential effects on the Greenland White-fronted Goose, which is listed as a Conservation Objective for both sites:

Cregganna Marsh SPA (004142)
Rahasane Turlough SPA (004089)

The following European Sites are also screened in, as per the applicant's screening conclusion:

Galway Bay Complex SAC (000268)
Inner Galway Bay SPA (004031)

12.4. **Stage II AA**

12.4.1. The NIS states that there will be no direct effects on the Galway Bay Complex SAC or the Inner Galway Bay SPA as the footprint of the proposed development is located entirely outside the designated sites and there is no direct surface water connectivity between the proposal and any EU Designated Site. In addition, there is no pathway for effects on the terrestrial habitats for which the Galway Bay Complex SAC is designated. Potential pathways for indirect effects on the following surface water dependent qualifying interests of the SAC were identified:

Mudflats and sandflats not covered by seawater at low tide [1140]

Coastal lagoons [1150]
Large shallow inlets and bays [1160]
Reefs [1170]
Salicornia and other annuals colonising mud and sand [1310]
Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i> [7210]
Alkaline fens [7230]
Lutra lutra (Otter) [1355]
Phoca vitulina (Harbour Seal) [1365]

These effects may arise as a result of deterioration of surface water quality resulting, from emissions to surface water during construction and from pollution associated with the surface water runoff from the hard-standing areas of the proposed development. The applicant's Stage 2 AA states that no indirect effect has been identified as pathways have been robustly blocked by the following means:

- The proposal layout has been designed to be entirely located outside of SAC and behind an existing stone wall and hedgerow,
- A grass buffer is maintained between the development and the western site boundary, in the form of amenity grassland and meadow habitat. This increases the separation between the proposal and the SAC.
- Construction best practice measures are implemented.
- Operational services, including all foul water will be connected to the local public sewer. All surface water runoff will enter appropriately designed petrol interceptors prior to discharge to specified percolation areas.

Based on the design measures described above, the absence of surface water connectivity (Hydro-Environmental Services, 2018) and the separation of the proposal from both SAC and the SPA, no pathway for indirect effect has been identified with regard to surface water pollution or disturbance to any designated site. In addition, the site is separated from the Inner Galway Bay SPA by over 300 m to the west of the development (separated by hedgerows, marsh/wet grassland and a main road / Maree Road). The applicant's Stage 2 AA concludes that there will

therefore be no potential for significant effects on the species for which the sites have been designated. It states that there will be no reduction in key habitats supporting populations of Annex I & II species and no reduction in the populations of any Annex II species as a result of the proposed development.

12.4.3. I note the comment of the DoCHG that the information and analysis in the NIS will need to be supplemented by additional data, assessment and analysis, including with respect to the conservation objectives of the relevant European sites, aspects of habitat structure and function, and the effects of the current proposal in combination with other plans and projects. The comment also notes the potential for effects associated with pressures of increasing amenity and recreational activity, including dog-walking, due to increasing development and population pressure in the area, and progressive losses and fragmentation of open spaces, require particular attention, noting the potential for increased disturbance in two SPAs in particular (i.e. the Inner Galway Bay SPA and the Cregganna Marsh SPA). The DoCHG also comments that the information and analysis in the applicant's Stage 2 AA will need to be supplemented by:

- Additional data and analysis available from the EIAR (including appendices), notably in respect of soils, geology, hydrology and hydrogeology;
- Additional assessment and analysis with respect to the conservation objectives of the European sites at risk, and noting the habitats, species, and attributes and targets of relevance;
- Further assessment of the likely effects of the proposed development alone, and in combination with other plans and projects, on the following in particular: (a) qualifying interest alkaline fen habitats within the SAC, including as a result of water supply, water levels, directions of flow, water quality, need for drainage or drainage maintenance, need for flood risk measures, etc. and (b) special conservation interest bird species, including as a result of increasing disturbance and potential increases in recreational and amenity pressures.
- Further assessment of the likely effects of the proposed development alone, and in combination with other plans and projects, on special conservation interest bird species, including as a result of increasing disturbance and potential increases in recreational and amenity pressures.

- 12.4.4. I also note that the Annex I habitat 'semi-natural dry grasslands (Festuco-Brometalia) [6210]' is present at the development site. This habitat is listed as a Qualifying Interest of the adjoining Galway Bay Complex SAC (000268), with a Conservation Objective to maintain the favourable conservation condition of Annex I habitats and Annex II species. This matter is not considered in the applicant's Stage 2 AA.
- 12.4.5. In addition, as discussed above, the European sites Cregganna Marsh SPA (004142) and Rahasane Turlough SPA (004089), which have been screened in by the Stage 1 assessment, are not included in the applicant's Stage 2 AA. It is therefore not possible for the Board to carry out an AA on these sites.
- 12.4.6. Having regard to the above, I am not satisfied that the data, assessment and analysis submitted are sufficient to enable the Board to carry out an AA.

12.5. Mitigation Measures and Residual Impacts

- 12.5.1. The NIS states that the measures employed in the design of the development to prevent impacts on designated sites are best practice construction measures, are standard procedures and are an integral part of the design of the project and are not considered to be mitigation measures.

12.6. Other Plans or Projects (In Combination Effects)

- 12.6.1. No significant 'in combination' effects are envisaged.

12.7. AA Conclusion

- 12.7.1. On the basis of the information provided with the application, including the Natura Impact Statement, and in light of the assessment carried out above and with regard to the precautionary principle, it is not possible to reach a conclusion of no adverse effects on the integrity of the following European Sites, in view of their Conservation Objectives:

Galway Bay Complex SAC (000268)

Inner Galway Bay SPA (004031)

Cregganna Marsh SPA (004142)

Rahasane Turlough SPA (004089)

13.0 Conclusion

- 13.1.1. The proposed development is considered to be in accordance with the provisions of the Galway County Development Plan 2015-2021 and the Oranmore Local Area Plan 2012-2022.
- 13.1.2. The baseline surveys on which the Biodiversity: Flora and Fauna chapter of the EIAR are based do not allow for seasonal variations in the flora and fauna present at the development site and the exact extent of the presence of the Annex I priority habitat 'Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (*important orchid sites)' is therefore unclear. There is therefore insufficient information on which to base a robust assessment of potential impacts on bird species, or to consider potential impacts on the qualifying interests of European sites in the vicinity.
- 13.1.3. The above assessment concludes on the basis of the information provided and having regard to the comments of the DoCLG, specifically (i) potential effects on the Greenland White-fronted Goose which is highly susceptible to disturbance from human activity as a result of increased amenity and recreational activity, including dog-walking and (ii) potential effects on the grazing habitat of the Greenland White-fronted Goose, which may be present at the development site, that the Board cannot be satisfied that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on the European sites Cregganna Marsh SPA (004142) and Rahasane Turlough SPA (004089), in view of the sites' Conservation Objectives. The applicant's Stage I AA screens out both of these European sites and it is therefore not possible for the Board to carry out AA. In addition, the applicant's Stage 2 AA does not consider (i) the potential for effects on special conservation interest bird species of the Inner Galway Bay SPA (004031) and the Cregganna Marsh SPA (004142) including as a result of increasing disturbance and potential increases in recreational and amenity pressures or (ii) potential effects on qualifying interest alkaline fen habitats within the Galway Bay Complex SAC (000268) including as a result of water supply, water levels, directions of flow, water quality, need for drainage or drainage maintenance, need for flood risk measures, etc.

13.1.4. Having regard to the above, I am not satisfied that the data, assessment and analysis submitted are sufficient to enable the Board to carry out an AA. I therefore recommend that the Board refuse permission.

14.0 Recommendation

14.1. Having considered the contents of the application including the Environmental Impact Assessment Report and the Natura Impact Statement, the planning history of the vicinity, the provisions of the Galway County Development Plan 2015-2021 and the Oranmore Local Area Plan 2012-2022 and relevant national planning policy as listed in above section 6.1, the comment of Galway County Council, the submissions of prescribed bodies and the observations made in writing to the Board. I recommend that permission be refused for the reasons and considerations set out hereunder.

15.0 Reasons and Considerations

15.1. Having regard to the information provided in the Screening Report dated 14th June 2018, the Board could not be satisfied that the exclusion from the Natura Impact Statement of the European Sites Cregganna Marsh Special Protection Area (SPA) (Site Code: 004142) and Rahasane Turlough SPA (Site Code: 004089), on the basis that the development is entirely outside the designated sites with no complete source-pathway-receptor chain, was appropriate given the possible use of the development site by the Greenland White-fronted Goose, which is listed as a species of Special Conservation Interest for both SPAs. In addition, the Natura Impact Statement does not consider (i) the potential for effects on Special Conservation Interest bird species of the Inner Galway Bay SPA (Site Code: 004031) and the Cregganna Marsh SPA (Site Code: 004142) including as a result of increasing disturbance and potential increases in recreational and amenity pressures or (ii) potential effects on qualifying interest alkaline fen habitats within the Galway Bay Complex Special Area of Conservation (Site Code: 000268). The Board therefore cannot be satisfied, beyond reasonable scientific doubt, that the proposed development, either individually or in combination with other plans and projects, would not adversely affect the integrity of these European sites Galway Bay Complex Special Area of Conservation (Site Code: 000268), Inner Galway Bay SPA (Site Code: 004031), Cregganna Marsh SPA (004142) and Rahasane Turlough SPA (004089), in view of the sites' Conservation Objectives.

The proposed development would therefore be contrary to the proper planning and sustainable development of the area.

Sarah Moran
Senior Planning Inspector
24th September 2018

Appendix I List of Third Party Submissions

Siobhan and Mike Lever

Teresa Keehan

Wayne Donnellan

Leona King and Family

Marie Irwin and Simon Kelly

Maureen Donohoe

Oranmore Community Development Association Ltd.

Phillip Smith

Frank Mannion

Galway Cycling Campaign

Grainne Cotter

Hildegarde Naughton

Celine Graham

Claire Quinn

Coill Clocha Management Company

Hugh and Ailish Hamill

Oliver Quinn

Frank and Mairead McManamon

Jill Holtz

John and Susanne Lawlor

Neil Dunworth

Stuart McLaren

Constatin and Vicorita Acabei

Alacoque Morris

Appendix E

Statement of Consistency
(Matrix of Planning Policies and Guidance)

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1. COMPLIANCE WITH THE NATIONAL PLANNING FRAMEWORK

Chapter	Policy Objective	Guidance / Requirement	Statement of Consistency
Chapter 2: A New Way Forward	National Policy Objective 3a	Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.	The proposed development will provide 212 no. residential units in the existing settlement of Oranmore.
Chapter 2: A New Way Forward	National Policy Objective 3b	Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.	The proposed development will provide 212 no. residential units in the existing Galway suburb of Oranmore.
Chapter 6 - People, Homes and Communities	National Policy Objective 32	To target the delivery of 550,000 additional households to 2040.	The proposed development will provide 212 no. residential units which will assist in the delivery of additional households.
Chapter 6 - People, Homes and Communities	National Policy Objective 33	Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.	The proposed site is zoned as R – Residential (Phase 1) lands in the Oranmore LAP. Phase 1 residential lands have been identified for short to medium term growth in suitable locations that are serviceable and accessible.
Chapter 6 – People, Homes and Communities	National Policy Objective 34	Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.	The proposed development provides for 212 no. residential units and provides a significant response to Galway’s housing needs in accordance with the adopted Housing Strategy 2015-2021, which has been informed by the Core Strategy of the Galway County

Chapter	Policy Objective	Guidance / Requirement	Statement of Consistency
			<p>Development Plan (GCDP). The scheme includes a range of house types and sizes (32.1% two-bed; 33% three-bed; and 34.9 % four-bed).</p> <p>The proposed residential units have been designed to accommodate the changing needs of a household over time. For example, House Type E consists of four-bed semi-detached units with possible attic conversion.</p> <p>In addition, the units have been designed to comply with energy efficiency standards.</p>
<p>Chapter 6 – People, Homes and Communities</p>	<p>National Policy Objective 35</p>	<p>Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights</p>	<p>The area in which the development is proposed is characterised by existing and emerging residential development. In this regard the proposed development can be considered as an infill development scheme.</p>

2. COMPLIANCE WITH SUSTAINABLE RESIDENTIAL DEVELOPMENT IN URBAN AREAS (CITIES, TOWNS & VILLAGES), 2009

Apartment Design Standards	Guidance / Requirement	Statement of Consistency
Sequential Approach to the Development	The Guidelines reinforce the need to adopt a sequential approach to the development of land and note in Section 2.3 and 'the sequential approach as set out in the Departments Development Plan Guidelines (DoEHLG, 2007) specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference, encouraging infill opportunities...'	The proposed site is zoned as R – Residential (Phase 1) lands. Phase 1 residential lands have been identified for short to medium term growth in suitable locations that are serviceable and accessible.
Community Facilities	Sustainable neighbourhoods require a range of community facilities, and each district/neighbourhood will need to be considered within its own wider locality, as some facilities may be available in the wider area while others will need to be provided locally	The proposal includes a childcare facility and extensive areas of open space.
Density	Section 6.11 of the Guidelines provides for 20-35 dwelling units/hectare on 'Edge of Centre' sites.	<p>The proposed development layout achieves 30.94 units/hectare, which is above the midpoint of the required density for the site location. The proposed density is considered to accord with Section 6.11 of the <i>Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas</i> as they relate to 'Edge of Centre' sites.</p> <p>It is noted that in the previous application (ABP 301952-18) in relation to 'Density and Housing Mix', the Inspector commented as follows:</p> <p><i>'The proposed density is low for zoned and serviced land in an established residential area</i></p>

Apartment Design Standards	Guidance / Requirement	Statement of Consistency
		<p><i>close to the edge of the Galway Metropolitan Area. However, given the site constraints including flood zones, proximity to a pNHA and to several European sites, roads objectives and the presence of a Recorded Monument, it is considered that the overall density is appropriate. The mix of house types is deemed acceptable'.</i></p> <p>[...]</p> <p><i>'To conclude, the proposed density, housing mix and crèche are considered to be acceptable in the context of site constraints and to be generally in accordance with relevant LAP, development plan and national policies. The development is therefore considered to be acceptable in principle'. [Para 10.2.4]</i></p>

3. COMPLIANCE WITH URBAN DESIGN MANUAL A BEST PRACTICE GUIDE

Criteria	Guidance / Requirement	Statement of Consistency
Context	How does the development respond to its surroundings?	The area is characterised by existing and emerging residential development. The proposed development is responsive to the site context and is in keeping with the existing character, amenity, heritage, environment and landscape of the surrounding area. The scheme as proposed conforms with the surrounding area in terms of its scale, height, massing, building line and housing mix.
Connections	How well connected is the new neighbourhood?	<p>The scheme includes the provision of a new vehicular site access from the North-South Link Road.</p> <p>A network of footpaths throughout the proposed development will provide a high rate of accessibility to the local facilities with the town of Oranmore. Please refer to Dwg 2325-P-038 Site Pedestrian Access Routes Plan for details of the internal footpath locations and the connection to wider amenities within Oranmore town. The inclusion of these attractive, well designed walking routes will encourage pedestrians to access the local facilities on foot as opposed to taking their personal vehicles. The main pedestrian and cyclist access route to the proposed development from nearby Oranmore village centre will be via the Coill Clocha residential development to the north. Pedestrians shall utilise the existing pedestrian arrangements within the Coill Clocha housing development which will connect to the newly constructed pedestrian pathway along the link road and throughout the proposed development. This will result in a continuous pedestrian route from all locations within the proposed development to Oranmore town centre. Refer to Dwg 2325-P-038 Site Pedestrian Access Routes Plan for proposed connections. A secondary pedestrian and cyclist route is also provided to the south of the link road permitted under PR 15/1334.</p>

Criteria	Guidance / Requirement	Statement of Consistency
		<p>This allows users to access Oranmore village and the Maree road via the existing Oranhill housing estate.</p> <p>Pedestrian routes from the proposed development to the Oranmore town centre will be 1.00km in length and will take the average pedestrian 10 min to walk. Amenities in and around the town centre include local primary and secondary schools, shops, restaurant.</p>
Inclusivity	How easily can people use and access the development?	The proposed development provides a mix of 9 dwelling unit types differing in type and size. There is a range of public, communal and private amenity spaces and facilities for children of different ages, parents and the elderly. The proposed development will provide a variety of vehicle, pedestrian and cycle routes throughout the site. The development will also provide disabled car parking spaces.
Variety	How does the development promote a good mix of activities?	The proposed development provides for a mix of 9 dwelling unit types differing in type and size. This will ensure a mix of tenures is provided for within the scheme. The proposal also includes a childcare facility and extensive areas of open space.
Efficiency	How does the development make appropriate use of resources, including land?	The proposed development layout achieves 30.94 units/hectare. The proposed scheme achieves a plot ratio of 0.37 on the land zoned for 'R1' development. The proposed house designs provide for the provision of habitable spaces in the attic area of a number of units, which would increase the plot ratio to 0.41. The proposed density makes efficient use of these valuable Residential Phase 1 zoned lands.
Distinctiveness	How do the proposals create a sense of place?	There is a mix of dwelling units types, each with its own distinctive design. The scheme also incorporates an archaeological monument, Moneyduff Castle (RMP No GA095-084). The sowing of native wildflower

Criteria	Guidance / Requirement	Statement of Consistency
		meadow resulting in the creation of 0.4 hectares of semi-natural meadow habitat also assists in providing a good sense of place on site.
Layout	How does the proposal create people friendly streets and spaces?	The proposed layout provides for an easily accessible and easily navigable network of places. The new site access from the North-South Link Road provides the main artery route to the development with a number of other circulation roads and pedestrian/cyclist routes branching off this main route.
Public Realm	How safe, secure and enjoyable are the public areas?	A high level of passive surveillance will be created by the overlooking of adjacent residential developments.
Adaptability	How will the buildings cope with change?	House Type E consists of four-bed semi-detached units with possible attic conversion. In addition, the units have been designed to comply with energy efficiency standards.
Privacy and Amenity	How does the scheme provide a decent standard of amenity?	Each home has access to an area of useable private outdoor space. An extensive area of open space (29.3%) is provided within the scheme.
Parking	How will the parking be secure and attractive?	The proposed development will provide 409 number of parking spaces which will either be within the curtilage of the individual dwellings or be overlooked by adjacent dwellings. The parking areas have been incorporated into the landscape scheme. Bicycle parking has also been included.
Detailed Design	How well thought through is the building and landscape design?	A Design Statement prepared by Simon J Kelly architects provides details in respect of the design principles behind the proposed development. A comprehensive landscaping plan has been prepared by Cunnane Stratton Reynolds landscape architects which incorporates extensive areas of open space including a playground with specialist timber play equipment and passive amenity areas.

4. COMPLIANCE WITH THE SUSTAINABLE URBAN HOUSING: DESIGN STANDARDS FOR NEW APARTMENTS GUIDELINES FOR PLANNING AUTHORITIES 2018

Apartment Design Standards	Guidance / Requirement	Statement of Consistency
Specific Planning Policy Requirement 1	Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).	The overall scheme includes a range of house types and sizes (32.1% two-bed; 33% three-bed; and 34.9 % four-bed).
Specific Planning Policy Requirement 2	For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha: <ul style="list-style-type: none"> ▪ Where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50% of the development (i.e. up to 4 units) comprises studio-type units; ▪ Where between 10 to 49 residential units are proposed, the flexible dwelling mix provision for the first 9 units may be carried forward and the parameters set out in SPPR 1, shall apply from the 10th residential unit to the 49th; ▪ For schemes of 50 or more units, SPPR 1 shall apply to the entire development. 	N/A – is not a refurbishment or urban infill scheme.
Specific Planning Policy Requirement 3	Minimum Apartment Floor Areas: <ul style="list-style-type: none"> ▪ Studio apartment (1 person) 37 sq.m ▪ 1-bedroom apartment (2 persons) 45 sq.m ▪ 2-bedroom apartment (4 persons) 73 sq.m ▪ 3-bedroom apartment (5 persons) 90 sq.m 	As per the Architectural Design Statement- Appendix B submitted the permitted unit sizes accord with SPPR3.

Apartment Design Standards	Guidance / Requirement	Statement of Consistency
Specific Planning Policy Requirement 4	Section 3.16 requires minimum 50% dual aspect apartments in urban locations. This may be reduced to a minimum 33% in certain circumstances where it is necessary to ensure good street frontage and subject to high quality design, usually on inner urban sites, near to city or town centres, including SDZ areas.	The massing of the proposed duplex development ensures that every apartment benefits from facing onto at least two aspects, with the specific orientation depending on their location within a respective block.
Specific Planning Policy Requirement 5 Floor to Ceiling Height	Section 3.20 requires that minimum ceiling heights accord with the Building Regulations (i.e. 2.4m). Ceiling heights at ground floor level should be greater, a minimum 2.7m and designers should consider 3.0m on the ground floor of multi-storey buildings.	Ceiling heights provided are well in excess of the minimum standards proposed.
Specific Planning Policy Requirement 6	A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, subject to overall design quality and compliance with building regulations.	The proposed apartments comprise duplex type development blocks with own door access.
Other Design Criteria		
Internal Storage	Section 3.30 states that provision should be made for storage and utility (additional to kitchen/bedroom furniture), specifically for household utility functions such as clothes washing and the storage of bulky personal or household items. Section 3.32 and 3.33 states that secure storage can be provided outside individual units, and this may be used to satisfy up to half of the minimum storage requirement for individual apartment units.	Standard levels of storage have been provided within the Duplex units.

Apartment Design Standards	Guidance / Requirement	Statement of Consistency
Private Amenity Space	Section 3.35 requires that private amenity space shall be provided in the form of gardens or patios/terraces for ground floor apartments and balconies at upper levels.	For the duplex units, terraces are provided on the ground floor and balconies are provided on the second floor.
Security Considerations	Section 3.40 states that apartment developments should provide residents and visitors with a sense of safety, by maximising natural surveillance of streets, open spaces, play areas and any surface bicycle or car parking. Accordingly, blocks and buildings should overlook the public realm. Entrance points should be clearly indicated, well lit, and overlooked by adjoining dwellings. Particular attention should be given to the security of ground floor apartments and access to internal and external communal areas.	The duplex units overlook an area of public open space, with pedestrian and cycle linkages.
Communal Facilities in Apartments: Access and Services	Section 4.1 requires apartment schemes to be capable of meeting the changing needs of occupants through compliance with Part M of the building regulations	Easy and safe accessibility provided through all floor levels and entire site.
Refuse Storage	Section 4.8 requires that provision shall be made for the appropriate storage and collection of waste materials in apartment schemes. Within apartments, there should be adequate provision for the temporary storage of segregated materials prior to deposition in communal waste storage.	Waste storage areas are provided to the front of each of the Duplex units. Recycling facilities will also be provided. Waste collections would typically be undertaken by a specialist contractor, with the timing and frequency agreed to suit the Residence requirements and to respect Health and Safety protocols.
Communal Amenity Facilities	Section 4.10 requires the provision and proper future maintenance of well-designed communal amenity space is critical in meeting the amenity needs of residents. The design must ensure that the heights and orientation of adjoining blocks permit adequate levels of sunlight.	The proposed development provides for a range of amenity and common spaces. The proposed public open space is comprised of a high-quality scheme of landscaping, which include areas of formal and informal play and passive amenity areas.

Apartment Design Standards	Guidance / Requirement	Statement of Consistency
Children's Play	Section 4.13 requires that the recreational needs of children must be considered as part of communal amenity space within apartment schemes.	A comprehensive landscaping scheme has been developed which incorporates a playground with specialist timber play equipment and passive amenity areas. The proposed development therefore makes adequate provision for play for a broad range of ages.
Bicycle Parking	Section 4.15 states that bicycle parking provision for residential development generally is a matter for individual planning authorities. Where provided, bicycle parking spaces should be conveniently accessible to residents, both in terms of proximity to access points i.e. stair/lift cores to apartments and routes to the external road/ street network.	Cycle parking provided is in accordance with the National Cycle Manual. Please see Section 4.5 of the Architectural Design Statement for further details.
Car Parking	Section 4.18 states that the quantum of car parking provision for residential developments generally is a matter for individual planning authorities having regard to local circumstances (notably location and access to public transport).	Car parking provided is in accordance with the Galway County Plan. The proposed scheme includes 409 no. car parking spaces. Please see Appendix C of the Architectural Design Statement for further details.
Specific Planning Policy Requirements 7 to 9	Specific Planning Policy Requirements 7 to 9 relate to Build to Rent (BTR) and Shared Accommodation are not relevant to the current proposal.	N/A

5. URBAN DEVELOPMENT AND BUILDING HEIGHT GUIDELINES FOR PLANNING AUTHORITIES

Policy/Section	Guidance / Requirement	Statement of Consistency
Section 1.9	<p>These guidelines require that the scope to consider general building heights of at least three to four storeys, coupled with appropriate density, in locations outside what would be defined as city and town centre areas, and which would include suburban areas, must be supported in principle at development plan and development management levels.</p>	<p>The proposed housing design includes a mix of two to three storey buildings.</p> <p>It is noted that in the previous application (ABP 301952-18) in relation to 'Design and Layout', the Inspector commented as follows:</p> <p><i>'To conclude, I consider that the design and layout of the development are generally satisfactory with regard to national and development plan guidance for residential development and that there is a reasonable standard of residential accommodation for future residents of the scheme'. [Para 10.4.4]</i></p>
SPPR 4	<p>It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:</p> <ol style="list-style-type: none"> 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Sustainable Residential Development in Urban Areas (2007)" or any amending or replacement Guidelines; 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and 	<p>The proposed development layout achieves 30.94 units/hectare, which is above the midpoint of the required density for the site location. The proposed density is considered to accord with Section 6.11 of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas as they relate to 'Edge of Centre' sites.</p>

Policy/Section	Guidance / Requirement	Statement of Consistency
	<p>3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more</p>	<p>It is noted that in the previous application (ABP 301952-18) in relation to 'Density and Housing Mix', the Inspector commented as follows:</p> <p><i>'The proposed density is low for zoned and serviced land in an established residential area close to the edge of the Galway Metropolitan Area. However, given the site constraints including flood zones, proximity to a pNHA and to several European sites, roads objectives and the presence of a Recorded Monument, it is considered that the overall density is appropriate. The mix of house types is deemed acceptable'.</i></p> <p>[...]</p> <p><i>'To conclude, the proposed density, housing mix and crèche are considered to be acceptable in the context of site constraints and to be generally in accordance with relevant LAP, development plan and national policies. The development is therefore considered to be acceptable in principle'. [Para 10.2.4]</i></p>

6. NORTH WESTERN REGIONAL AUTHORITY DRAFT REGIONAL AND ECONOMIC STRATEGY

Criteria	Guidance / Requirement	Statement of Consistency
REGIONAL POLICY OBJECTIVE 12	Deliver at least 30% of all new housing within the existing built-up footprint of settlements with a population of over 1,500 (excluding Galway Metropolitan Area).	<p>It is noted that the settlement of Oranmore is featured in both Tier 1 (Galway Metropolitan Area) and Tier 4 (Key Town), with an explanation provided on Page 40 of the GCDP that the Galway Metropolitan Area only encompasses part of the LAP area of Oranmore. The proposed site is located in the Electoral District of Clarinbridge, therefore it is located outside the Galway Metropolitan Area (GMA).</p> <p>The provision of 212. No. residential units on site will assist in delivering at least 30% of all new housing within the existing built-up footprint of settlements with a population of over 1,500.</p>

7. COMPLIANCE WITH THE GALWAY COUNTY DEVELOPMENT PLAN 2015-2021 (GCDP)

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
Chapter 2 - Spatial Strategy, Core & Settlement Strategy	Objective SS 1 – Galway Metropolitan Area	Galway County Council shall support the important role of Galway City and the Galway Metropolitan Area (which includes the City area and the Electoral Divisions of Oranmore, Bearna, Galway Rural and Ballintemple which are inextricably linked to and function as part of a greater Galway City), as key drivers of social and economic growth in the County and in the wider Western Region and will support the sustainable growth of the strategic settlements, including the future development of Ardaun and Garraun, within the Galway Metropolitan Area.	The GCDP identifies Oranmore as a 'Key Town' with a population >1500. It is noted that the settlement of Oranmore is featured in both Tier 1 (Galway Metropolitan Area) and Tier 4 (Key Town), with an explanation provided on Page 40 of the GCDP that the Galway Metropolitan Area only encompasses part of the LAP area of Oranmore. The proposed site is located in the Electoral District of Clarinbridge, therefore it is located outside the Galway Metropolitan Area (GMA). Over the lifetime of the GCDP (i.e. 2015-2021) the Core Strategy estimates that the settlement of Oranmore can accommodate an increase in population of 1,170 people, with an associated requirement for 363 new homes. The proposed development is consistent with the requirements of the Core Strategy and the Settlement Strategy which seeks to support the development of the key towns of the County. The proposed development will contribute towards meeting the 363 no. new dwellings target provided for in the housing allocation.
Chapter 2 - Spatial Strategy, Core & Settlement Strategy	Objective SS 5 – Development of Key Towns	Support the development of the key towns of the County as outlined in the Core Strategy and Settlement Strategy in order to sustain strong, vibrant urban centres which act as important drivers for the local economies, reduces travel demand and supports a large rural hinterland, while providing a complementary role to the hub town of Tuam and	The GCDP identifies Oranmore as a 'Key Town' with a population >1500. It is noted that the settlement of Oranmore is featured in both Tier 1 (Galway Metropolitan Area) and Tier 4 (Key Town), with an explanation provided on Page 40 of the GCDP that the Galway Metropolitan Area only encompasses part of the LAP area of Oranmore. The proposed site is located in the Electoral District of Clarinbridge, therefore it is located outside the Galway Metropolitan Area (GMA). Over the lifetime of the GCDP (i.e. 2015-2021) the Core Strategy estimates that the settlement of Oranmore can accommodate an increase in population of 1,170 people, with an associated requirement

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
		the smaller towns and villages in the County.	for 363 new homes. The proposed development is consistent with the requirements of the Core Strategy and the Settlement Strategy which seeks to support the development of the key towns of the County. The proposed development will contribute towards meeting the 363 no. new dwellings target provided for in the housing allocation.
Chapter 3 – Urban & Rural Housing	Policy UHO 2 – Housing Strategy	Ensure, in accordance with Part V of the Planning & Development Act, 2000 (as amended) that arrangements for the provision of Housing are made in accordance with the current Housing Strategy 2015-2021. Secure the provision of social and specialist housing accommodation where possible, to meet the needs of all households and the disadvantaged sectors in the County, including older persons, first time buyers, those building their first homes, single person households on modest incomes, people with disabilities, special needs, Travellers etc.	The applicant proposes to provide the 21 no. units to fulfil their 10% Part V obligation in accordance with Section 95 of the Planning & Development Act 2000 (as amended). Please refer to Dwg 2325-P-033 for details of the location of the proposed units. Estimated calculations and methodology for calculating values for the proposed Part V units are set out in Appendix C .
Chapter 3 – Urban & Rural Housing	Objective UHO 1 – Housing Strategy	Secure the implementation of the Housing Strategy 2015-2021, including the implementation of its policies and objectives and requirement to reserve a minimum of 12% of residential development for social and specialist housing.	The applicant proposes to provide the 21 no. units to fulfil their 10% Part V obligation in accordance with Section 95 of the Planning & Development Act 2000 (as amended). Please refer to Dwg 2325-P-033 for details of the location of the proposed units. Estimated calculations and methodology for calculating values for the proposed Part V units are set out in Appendix C .

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
Chapter 3 – Urban & Rural Housing	Objective UHO 2 – Social and Specialist Housing	Implement Part V provisions as per the Planning and Development Act, 2000 (as amended) and any subsequent amendments to the Part V provision to reflect Government policy.	The applicant proposes to provide the 21no. units to fulfil their 10% Part V obligation in accordance with Section 95 of the Planning & Development Act 2000 (as amended). Please refer to Dwg 2325-P-033 for details of the location of the proposed units. Estimated calculations and methodology for calculating values for the proposed Part V units are set out in Appendix C .
Chapter 3 – Urban & Rural Housing	Objective UHO 7 – High Quality/Mix and Sensitive Design	Ensure that new developments are responsive to their site context and in keeping with the character, amenity, heritage, environment and landscape of the area. New development proposals will be required to complement the existing character of the town centre/area in terms of scale, height, massing, building line, housing mix, urban grain and definition and through high quality design and layout proposals for buildings and structures.	<p>The proposed development is responsive to the site context and is in keeping with the existing character, amenity, heritage, environment and landscape of the surrounding area.</p> <p>From a design perspective, the scheme as proposed conforms with the surrounding area in terms of its scale, height, massing, building line and housing mix.</p> <p>The proposed development has been designed to ensure the protection of the residential amenity of adjoining and adjacent residential properties</p>
Chapter 3 – Urban & Rural Housing	Objective UHO 8 – Urban Design	Promote the use of sustainable urban design principles and approaches that will help to create high quality built and natural environments appropriate to the context and landscape setting of the specific area, having regard to the guidance contained in the Sustainable Residential Development in Urban Areas Guidelines 2009, the	<p>The proposed development provides for a high-quality scheme that respects, responds to and integrates with the immediate and surrounding context. The proposed development takes full consideration of and accords with the provisions of the Sustainable Residential Development in Urban Areas Guidelines 2009, the Urban Design Manual 2009 and the Design Manual for Urban Roads & Streets (2013).</p> <p>An Architectural Design Statement prepared by Simon J Kelly architects provides details in respect of the design principles behind the proposed development. Tobin Consulting Engineers</p>

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
		accompanying Urban Design Manual 2009 (or any updated version) and the Design Manual for Urban Roads & Streets (2013) (including any superseding document).	have prepared a Statement of Compliance with Ministerial Guidelines - Design Manual for Urban Roads & Streets.
Chapter 3 – Urban & Rural Housing	Objective UHO 10 – Sequential Development	Endeavour to promote the orderly and phased development of residential development in accordance with the principles of the sequential approach and as set out in the Sustainable Residential Development in Urban Areas (Cities, Towns & Villages) Guidelines 2009 (or as updated). This shall include a positive presumption in favour of the sequential development of suitably serviced Residential (Phase 1) lands in zoned towns and villages.	The proposed site is zoned as R – Residential (Phase 1) lands. Phase 1 residential lands have been identified for short to medium term growth in suitable locations that are serviceable and accessible.
Chapter 5 – Roads & Transportation	Policy TI 5 – Roads, Streets and Parking	It is the policy of Galway County Council in conjunction with all relevant statutory agencies and infrastructure providers to provide road and street networks that are safe and convenient, that have adequate capacity to accommodate motorised traffic and non-motorised movements, that have a high environmental	The proposed development has been designed to be compliant with relevant regulations and the Design Manual for Roads and Streets (DMURS) policy guidance document. Tobin Consulting Engineers have prepared a Statement of Compliance with Ministerial Guidelines - Design Manual for Urban Roads & Streets which is submitted with this application.

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
		<p>quality with appropriate adjacent development and built form, particularly in the case of urban streets and streetscapes, and that adequate parking facilities are provided to serve the needs of towns and villages within the County. In this regard, the principles, approaches, and standards set out in the Design Manual for Urban Roads & Streets (2013) (including any superseding document) shall be applied to new development as appropriate.</p>	
<p>Chapter 5 – Roads & Transportation</p>	<p>Objective TI 9 – Car Parking</p>	<p>Provide/improve parking facilities in towns and villages as development and traffic demand. The requirements for car parking shall be in accordance with the standards and guidelines as set out within Chapter 13 (Development Management Standards and Guidelines) of this plan under Guidelines for Transportation, Roads, Parking, Loading and Storage.</p>	<p>The parking provisions at the proposed development have been derived in accordance with the GCDP. The development plan requires 1.5 no. parking spaces per 1-3 bedroom houses. This relates to 2 no. spaces per houses when provided on curtilage. The development plan requires 1 no. parking space per 4 no. children for the proposed crèche. The proposed crèche will allow for a capacity of 58 no. children and 10 no. staff.</p> <p>The minimum number of parking spaces required for the proposed development, in line with the GCDP, is 393 while the actual number of parking spaced being provided throughout the proposed development is 409.</p>

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
<p>Chapter 5 – Roads & Transportation</p>	<p>Objective TI 10 – Traffic and Transport Assessment (TTA) and Road Safety Audits (RSA)</p>	<p>Require all proposed new significant development proposals to be accompanied by a TTA and RSA, carried out by suitably competent consultants, which are assessed in association with their cumulative impact with neighbouring developments on the road network, in accordance with the requirements contained within the NRA's Traffic and Transport Assessment Guidelines, having regard and with respect to RSA in NRA DMRB HD19/12 Road Safety Audit (including any updated superseding document).</p>	<p>Tobin's Consulting Engineers have prepared a Traffic and Transportation Statement in support of the proposed development.</p>
<p>Chapter 5 – Roads & Transportation</p>	<p>Objective TI 11 – Urban Street Network and the Design Manual for Urban Roads and Streets</p>	<p>Support the treatment of the route network within the built areas of towns as urban streets that prioritise the needs of pedestrians, that facilitate cyclists wherever possible and that support public and private transport movements, stopping and parking, as appropriate. In this regard, the principles approaches, and standards set out in the Design Manual for Urban Roads and Streets 2013 (including any updated/superseding document) shall be applied to new development as appropriate.</p>	<p>The proposed development has been designed to be compliant with relevant regulations and the Design Manual for Roads and Streets (DMURS) policy guidance document. Section 5 of the submitted Traffic and Transportation Statement provides a statement of the proposed schemes compliance with the Design Manual for Urban Roads and Streets</p>

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
<p>Chapter 6 -Waste, Wastewater, Waste Management & Extractive Industry</p>	<p>Objective WW 7 – Surface Water Drainage and Sustainable Drainage Systems (SuDS)</p>	<p>Maintain and enhance, as appropriate, existing surface water drainage systems in the County, ensure that new developments are adequately serviced with surface water drainage infrastructure and promote the use of Sustainable Drainage Systems in all new developments.</p>	<p>A Civils Works Design Report has been prepared by Tobins Consulting Engineers which is submitted with this application.</p> <p>With regard to the proposed foul sewer, it is proposed that all pipes will be thermoplastic structured wall pipes. The maximum pipe diameter is to be 225mm, with a maximum and minimum gradient of 1/60 and 1/200. All velocities at said gradients fall within the limits of 0.75 and 3m/sec as set out in “Recommendations for Site Development Works” as published by the Department of Environment.</p> <p>The storm water drainage design has been designed to cater for all surface water runoff from all hard surfaces in the proposed development including roadways, roofs etc. All stormwater generated on site from roadways and roofs will discharge via Oil/Petrol Interceptor to one of 5 no. proposed soakaways which are situated in the centre and west of the site. The stormwater will soak away through soil.</p> <p>Further details are provided in the Civils Works Design Report.</p>
<p>Chapter 6 -Waste, Wastewater, Waste Management & Extractive Industry</p>	<p>Objective WM7 – On Site Provision for Waste Storage and Segregation</p>	<p>Seek to ensure on-site provision for waste storage and segregation (bio-waste/dry recyclables/residual waste) pending collection at all new domestic and non domestic premises, in order to comply with the Replacement Waste Management Plan for the Connacht Region (or updated document).</p>	<p>Waste collections would typically be undertaken by a specialist contractor, with the timing and frequency agreed to suit the Residence requirements and to respect Health and Safety protocols.</p>

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
<p>Chapter 7 - Energy/Renewable Energies & Communications Technology</p>	<p>Objective ER 7 - Energy Efficiency Technology in Buildings</p>	<p>The Planning Authority will have regard to the DOEHLG Guidelines on Sustainable Residential Developments in Urban Area: Guidelines for Planning Authorities (2009) and the accompanying guidance document Urban Design Manual in the assessment of any proposals for residential development, including inter alia those in respect of energy efficiency, passive solar design and renewable energy sources; The council shall:</p> <p>(a) Encourage and actively promote innovative housing design, energy efficient technologies and layout solutions that address concerns of environmental sustainability with regard to matters such as energy efficiency and the use of materials;</p> <p>(b) Actively encourage the integration of micro renewable energy sources into the design and construction of single and multiple housing developments throughout the County;</p> <p>(c) The Council shall work with local and relevant departments to identify where there is poor energy</p>	<p>The proposed scheme is designed to comply with Part L 2008 requirements for energy performance and greenhouse gas emissions. The development is targeting a BER certification of at least A3.</p>

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
		<p>infrastructure and low penetration of renewable energy. The Council shall promote the use of district heating/cooling and combined heat and power in new single and multiple housing developments, within schools, commercial and public buildings throughout the County;</p> <p>(d) Galway County Council shall require the provision of energy efficient street lighting in all private developments.</p>	
<p>Chapter 8 - Climate Change & Flooding</p>	<p>Objective CC 3 - Green Infrastructure</p>	<p>Galway County Council shall promote the benefit of open spaces and implement the integration of green infrastructure/networks (e.g. interconnected network of green spaces (including aquatic ecosystems) and other physical features on land) into new development and regeneration proposals in order to mitigate and adapt to climate change.</p>	<p>The proposed scheme provides for 20.22% of public open space (excluding RA Zoned lands) which exceeds the 15% requirement thus satisfying LAP provisions. The proposed scheme provides 29.07% open space when RA zoned lands and the castle zone are included. The proposed public open space is comprised of a high-quality scheme of landscaping, which include areas of formal and informal play and passive amenity areas.</p>

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
Chapter 8 - Climate Change & Flooding	Objective FL 4 – Flood Risk Assessment for Planning Applications and CFRAMS	Site-specific Flood Risk Assessment (FRA) is required for all planning applications in areas at risk of flooding, even for developments appropriate to the particular flood zone. The detail of these site-specific FRAs will depend on the level of risk and scale of development. A detailed site-specific FRA should quantify the risks, the effects of selected mitigation and the management of any residual risks. The Council shall have regard to the results of any CFRAM Studies in the assessment of planning applications.	A Flood Risk Assessment (FRA) has been prepared by Hydro Environmental Service, which is included in Appendix 7.1 of the Environmental Impact Assessment Report. The FRA is carried out in accordance with ‘The Planning System and Flood Risk Management Guidelines for Planning Authorities’ (DoEHLG, 2009).
Chapter 8 - Climate Change & Flooding	Objective FL 5 – SFRA/FRA and Climate Change	SFRAs and site-specific FRAs shall provide information on the implications of climate change with regard to flood risk in relevant locations. The 2009 OPW Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management (or any superseding document) shall be consulted with to this effect.	The western CFRAM study provided for the expected impacts of climate change based on the 2009 OPW Draft Guidance. The results of the Western CFRAM Study are an integral part of the submitted site-specific FRA and as such the recommendations of the FRA includes provisions for the implications of climate change. The FRA is provided in Appendix 7.1 of the Environmental Impact Assessment Report.

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
<p>Chapter 9 - Heritage, Landscape & Environmental Management</p>	<p>Objective ARC 1 – Protection of Archaeological Sites</p>	<p>Protect archaeological sites and monuments their settings and visual amenity and archaeological objects and underwater archaeological sites that are listed in the Record of Monuments and Places, in the ownership/guardianship of the State, or that are subject of Preservation Orders or have been registered in the Register of Historic Monuments and seek to protect important archaeological landscapes.</p>	<p>An Archaeological Impact Assessment and Pre-Development Testing Survey of the proposed scheme has been completed by Richard Crumlish, B.A., M.I.A.I., Consultant Archaeologist, the results of which are enclosed in Chapter 11 and Appendix 11.1 respectively of the Environmental Impact Assessment Report. A Conservation Management Plan for the site of Moneyduff Castle, prepared by Anne Carey, Historic Buildings Consultant and Richard Crumlish, Consultant Archaeologist, is also enclosed in Appendix 11. 2 of the Environmental Impact Assessment Report.</p> <p>An exclusion zone of 20m has been established around the site of Moneyduff Castle (RMP No GA095-084) within which no development shall take place.</p>
<p>Chapter 9 - Heritage, Landscape & Environmental Management</p>	<p>Policy ARC 3 – Consultation</p>	<p>Consult with the National Monuments Service of the Department of Arts, Heritage and the Gaeltacht in relation to proposed developments adjoining archaeological sites.</p>	<p>The applicant has consulted with the National Monuments Service of the Department of Arts, Heritage and the Gaeltacht in relation to proposed developments adjoining archaeological sites.</p> <p>All recommendations from the archaeology assessment are subject to the final approval of the Department of Culture, Heritage and the Gaeltacht.</p>
<p>Chapter 9 - Heritage, Landscape & Environmental Management</p>	<p>Policy ARC 4 – Management of Archaeological Sites and Monuments</p>	<p>Support the preservation, conservation and management of archaeological sites and monuments, together with the settings of these monuments.</p>	<p>There are historic castle tower remains within the development site which are to be protected via a 20m exclusion zone. The 20m exclusion zone will be fenced off from the site, and the contractor will not have any storage, plant, or traffic going inside this exclusion zone during the construction period. Suitable fencing will be erected to ensure the remains are protected and preserved during the construction period, and regular checks and inspections will be carried out on this by the contractor and project archaeologist.</p>

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
			Refer to Section 3.3.5 of the EIAR for further details.
Chapter 9 - Heritage, Landscape & Environmental Management	Policy ARC 5 - Archaeological Heritage	Ensure the protection and sympathetic enhancement of archaeological heritage in the plan area, in particular by implementing the relevant provisions of the Planning and Development Act, 2000 (as amended), The National Monuments Act, 1930 (as amended), and The National Policy on Town Defences, 2008 (Department of the Environment, Heritage and Local Government).	An exclusion zone of 20m has been established around the site of Moneyduff Castle (RMP No GA095-084) within which no development shall take place. A Conservation Management Plan for the site of Moneyduff Castle, prepared by Anne Carey, Historic Buildings Consultant and Richard Crumlsh, Consultant Archaeologist, is also enclosed in Appendix 11. 2 of the Environmental Impact Assessment Report.
Chapter 9 - Heritage, Landscape & Environmental Management	Objective ARC 7 - Recorded Monuments	Ensure that any development in the immediate vicinity of a Recorded Monument is sensitively designed and sited and does not detract from the monument or its visual amenity.	An exclusion zone of 20m has been established around the site of Moneyduff Castle (RMP No GA095-084) within which no development shall take place. A Conservation Management Plan for the site of Moneyduff Castle, prepared by Anne Carey, Historic Buildings Consultant and Richard Crumlsh, Consultant Archaeologist, is also enclosed in Appendix 11. 2 of the Environmental Impact Assessment Report.

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
<p>Chapter 9 - Heritage, Landscape & Environmental Management</p>	<p>Policy NHB 1 - Natural Heritage and Biodiversity</p>	<p>It is the policy of Galway County Council to support the protection, conservation and enhancement of natural heritage and biodiversity, including the protection of the integrity of European sites, that form part of the Natura 2000 network, the protection of Natural Heritage Areas, proposed Natural Heritage Areas Ramsar Sites, Nature Reserves, Wild Fowl Sanctuaries and Conamara National Park (and other designated sites including any future designations) and the promotion of the development of a green/ ecological network within the plan area, in order to support ecological functioning and connectivity, create opportunities in suitable locations for active and passive recreation and to structure and provide visual relief from the built environment.</p>	<p>An Appropriate Assessment Screening Report and Natura Impact Statement have been prepared by McCarthy Keville O’Sullivan to accompany this planning application.</p> <p>The NIS concludes as follows:</p> <p><i>‘It can be concluded, on the basis of objective scientific information, that the proposed development, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site.’</i></p> <p>A habitat management plan has been produced for the site of the proposed development. Full details of the plan are provided in Appendix 3-4 of the EIAR. This plan will be implemented through both the construction and operational phases of the development and will form an integral part of the development. The implementation of a grassland management regime will ensure the long-term viability of the semi-natural calcareous grassland habitat within the landownership boundary. Supplementary planting within existing hedgerows along the west and south of the site and the replacement of the eastern hedge community will ensure that connectivity of linear landscape features will be retained and enhanced. Bird and bat boxes will be provided for additional nesting/roosting habitat on the site. Information signage will be used to help provide a better understanding of the floral diversity in the area and management practices required to maintain the habitat in its optimal quality.</p>

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
<p>Chapter 9 - Heritage, Landscape & Environmental Management</p>	<p>Objective NHB 2 – Biodiversity and Ecological Networks</p>	<p>Support the protection and enhancement of biodiversity and ecological connectivity within the plan area, including woodlands, trees, hedgerows, semi-natural grasslands, rivers, streams, natural springs, wetlands, stonewalls, geological and geomorphological systems, other landscape features and associated wildlife where these form part of the ecological network and/or may be considered as ecological corridors or stepping stones in the context of Article 10 of the Habitats Directive.</p>	<p>As above.</p>
<p>Chapter 9 - Heritage, Landscape & Environmental Management</p>	<p>Objective NHB 11 – Trees, Parkland/Woodland, Stonewalls and Hedgerows</p>	<p>a) Protect important trees, tree clusters and hedgerows within the County and ensure that development proposals take cognisance of significant trees/tree stands. Ensure that all planting schemes use suitable native variety of trees of Irish provenance; b) Seek to retain natural boundaries, including stonewalls, hedgerows and tree boundaries, wherever possible and replace with a boundary type similar to the existing boundary where removal is unavoidable. Discourage the felling of mature trees to facilitate development and</p>	<p>A Landscape Master Plan has been prepared by Cunnane Stratton Reynolds landscape architects. The proposed scheme integrates existing trees on the development sites where appropriate and provides for additional planting as part of a comprehensive landscaping strategy for the site. See Dwg18223-3-100 Landscape Master Plan .</p>

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
		<p>encourage tree surgery rather than felling where possible. All works to be carried out in accordance with the provisions of the Forestry Act, 1946.</p>	
	<p>Policy CF 3 – Education and Childcare Facilities</p>	<p>Promote the provision of education opportunities for all groups in the County and the provision of day care and childcare facilities by both the public and private sectors in settlements and communities throughout the County.</p>	<p>The proposed scheme includes the provision of a childcare facility. The childcare facility is proposed to be located at the western boundary of the site, at the end of the main access road. The proposed childcare facility comprises a single storey structure with a ridge height of 4.05 metres. The external finishes are to be a mix of render and a select stone cladding. The proposed external play area extends to 265 sqm and is enclosed by a 3-meter-high wall. Dedicated drop off car parking and bicycle parking spaces are provided adjacent to the facility</p>
<p>Chapter 10 - Cultural, Social & Community Development</p>	<p>Objective CF 3 – Crèche Facilities</p>	<p>Require the provision of crèche facilities in mixed use/residential developments in accordance with the ministerial guidelines for Planning Authorities on Childcare Facilities published in 2001. The Planning Authority shall encourage the development of a broad range of childcare facilities, i.e. parttime, full day-care, after-school care, etc., including those based in residential areas, in employment areas and in areas close to where users of such</p>	<p>In accordance with the 'Guidelines for Planning Authorities on Childcare Facilities' (DEHLG, 2001), the proposed scheme includes the provision of a childcare facility. The childcare facility has capacity for 58 no. children and 10 no. staff members</p>

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
		<p>facilities live. In general, childcare facilities outside of established settlements shall only be permitted adjacent to or in close proximity to existing educational or social facilities (national schools, rural shops/post offices, etc).</p>	
<p>Chapter 10 - Cultural, Social & Community Development</p>	<p>Objective CF 4 – Sport, Amenity and Recreation</p>	<p>Support and facilitate local communities and sporting organisations in the development of sport and recreational facilities. Support the modest expansion of existing and authorised sporting facilities throughout the County. Seek to develop open spaces throughout the County which will support a range of recreational and amenity activities that provides for active and passive needs.</p>	<p>A comprehensive landscaping scheme has been developed which incorporates a playground with specialist timber play equipment and passive amenity areas. The proposed development therefore makes adequate provision for play for a broad range of ages.</p>
<p>Chapter 10 - Cultural, Social & Community Development</p>	<p>Objective CF 5 – Play Facilities</p>	<p>Support the development of play facilities at suitable locations in the County in accordance with the National Play Strategy Ready Steady Play!.</p>	<p>A comprehensive landscaping scheme has been developed which incorporates a playground with specialist timber play equipment and passive amenity areas. The proposed development therefore makes adequate provision for play for a broad range of ages.</p>

8. COMPLIANCE WITH THE ORANMORE LOCAL AREA PLAN 2012-2022

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
Chapter 2 – Development Strategy	Objective DS 1 – Orderly and Sequential Development	Support the orderly and sequential development of the Plan Area, focussing on the consolidation and continued vitality and viability of the town centre and the protection and enhancement of the existing landscape setting, character and unique identity of the town.	The proposed site is zoned as R – Residential (Phase 1) lands. Phase 1 residential lands have been identified for short to medium term growth in suitable locations that are serviceable and accessible.
Chapter 2 – Development Strategy	Objective DS 2 – Consistency with the Core Strategy	Galway County Council will ensure that developments permitted within the Plan Area are consistent with the revised zoned land allocations in the Core Strategy and associated provisions in the Galway County Development Plan.	The GCDP identifies Oranmore as a ‘Key Town’ with a population >1500. It is noted that the settlement of Oranmore is featured in both Tier 1 (Galway Metropolitan Area) and Tier 4 (Key Town), with an explanation provided on Page 40 of the GCDP that the Galway Metropolitan Area only encompasses part of the LAP area of Oranmore. The proposed site is located in the Electoral District of Clarinbridge, therefore it is located outside the Galway Metropolitan Area (GMA). Over the lifetime of the GCDP (i.e. 2015-2021) the Core Strategy estimates that the settlement of Oranmore can accommodate an increase in population of 1,170 people, with an associated requirement for 363 new homes. The proposed development is consistent with the requirements of the Core Strategy and the Settlement Strategy which seeks to support the development of the key towns of the County. The proposed development will contribute towards meeting the 363 no. new dwellings target provided for in the housing allocation.

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
Chapter 2 – Development Strategy	Objective DS 3 – Natura 2000 Network and Habitats Directive Assessment	Protect European sites that form part of the Natura 2000 network (including Special Protection Areas and Special Areas of Conservation) in accordance with the requirements in the EU Habitats Directive (92/43/EEC), EU Birds Directive (2009/147/EC), the Planning and Development (Amendment) Act 2010, the European Communities (Birds and Natural Habitats) Regulations 2011 (SI No. 477 of 2011) (and any subsequent amendments or updated legislation) and having due regard to the guidance in the Appropriate Assessment Guidelines 2010 (and any updated/superseding guidance).	<p>McCarthy Keville O’Sullivan Planning and Environmental Consultants Ltd have prepared an Appropriate Assessment Screening Report and Natura Impact Statement to provide the information necessary to allow the competent authority to conduct an Article 6(3) Screening for Appropriate Assessment for the proposed development.</p> <p>The submitted NIS report concludes as follows:</p> <p><i>‘It can be concluded, on the basis of objective scientific information, that the proposed development, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site.’</i></p>
Chapter 2 – Development Strategy	Objective DS 4 – Development Management Standards and Guidelines	The general development management standards and guidelines set out under the current Galway County Development Plan, or any subsequent variation/review, shall apply as appropriate in the Plan Area. In addition, any specific development management guidelines set out in Section 3 of this plan shall also be applied, as appropriate, to development proposals in the Plan Area.	The proposed development complies with the general development management standards as set out in Section 8.3 of the Planning Report and Statement of Consistency . In addition, the Architectural Design Statement report includes a Statement of Compliance with Quality Housing for Sustainable Communities guidance in Appendix B, showing each dwelling, the associated house type, provided accommodation areas and minimum standards achieved.

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
Chapter 2 – Development Strategy	Objective DS 5 – Service Led Development	Development under the Plan shall be preceded by sufficient capacity in the public waste water infrastructure and potable water infrastructure.	The proposed site is zoned as R – Residential (Phase 1) lands. Phase 1 residential lands have been identified for short to medium term growth in suitable locations that are serviceable and accessible.
Chapter 2 – Development Strategy	Objective DS 6 – Residential Development Phasing	Direct residential development into appropriately zoned and serviced areas in accordance with the phased development framework set out in Sections 3.1 and 3.2 and on Map 1A/1B - Land Use Zoning	The proposed site is zoned as R – Residential (Phase 1) lands. Phase 1 residential lands have been identified for short to medium term growth in suitable locations that are serviceable and accessible.
Chapter 2 – Development Strategy	Objective DS 8 – Flood Risk Management and Assessment (Refer to Map 3A and 3B)	Ensure that proposals for new developments located within identified or potential flood risk areas, or which may exacerbate the risk of flooding elsewhere, are assessed in accordance with the provisions of The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 (or as updated) and the relevant policies and objectives of this Plan.	A Flood Risk Assessment has been prepared by Hydro Environmental Services. The FRA is carried out in accordance with ‘The Planning System and Flood Risk Management Guidelines for Planning Authorities’ (DoEHLG, 2009). See Appendix 7.1 of the EIAR for details.

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
<p>Chapter 3 - Development Policies, Objectives and Guidelines</p>	<p>Objective LU 3 – Residential (R)</p>	<p>Promote the development of appropriate and serviced lands to provide for high quality, well laid out and well landscaped sustainable residential communities with an appropriate mix of housing types and densities, together with complementary land uses such as community facilities, local services and public transport facilities, to serve the residential population of the area. Protect existing residential amenities and facilitate compatible and appropriately designed new infill development, in accordance with the proper planning and sustainable development of the area. A Phasing Scheme shall apply to residential uses on Residential (R) zoned lands, as set out under Objective RD1 in Section 3.2.2.</p>	<p>The proposed site is zoned as R – Residential (Phase 1) lands. Phase 1 residential lands have been identified for short to medium term growth in suitable locations that are serviceable and accessible.</p> <p>The proposed development is responsive to the site context and is in keeping with the existing character, amenity, heritage, environment and landscape of the surrounding area.</p> <p>From a design perspective, the scheme as proposed conforms with the surrounding area in terms of its scale, height, massing, building line and housing mix.</p> <p>The proposed development has been designed to ensure the protection of the residential amenity of adjoining and adjacent residential properties</p>
<p>Chapter 3 - Development Policies, Objectives and Guidelines</p>	<p>Objective LU14 – Development Densities</p>	<p>Ensure that the density of new development is appropriate to the land use zone and site context, is in keeping with the development pattern of the area, does not unduly impact on the amenities of the area and that it results in a positive relationship between new developments and any adjoining public spaces. Promote the</p>	<p>The proposed scheme achieves a plot ratio of 0.37 on the land zoned for 'R1' development. The proposed house designs provide for the provision of habitable spaces in the attic area of a number of units, which would increase the plot ratio to 0.41. This is considered to comply with the LAP standards which has a plot area ratio range of 0.10 to 0.50 for residential development.</p> <p>The proposed development is responsive to the site context and is in keeping with the existing character, amenity, heritage, environment and landscape of the surrounding area. From a design perspective,</p>

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
		<p>development of higher density development in appropriate locations, such as suitable sites within the town centre and adjacent to public transport facilities, where such development is compatible with heritage and urban design objectives and infrastructure capacity.</p>	<p>the scheme as proposed conforms with the surrounding area in terms of its scale, height, massing, building line and housing mix. The proposed development has been designed to ensure the protection of the residential amenity of adjoining and adjacent residential properties</p>
<p>Chapter 3 - Development Policies, Objectives and Guidelines</p>	<p>DM Guideline LU1 – Development Densities</p>	<p>The development of higher densities will need to be appropriate to the context and will be assessed based on the merits of the proposal and subject to good design, compliance with both qualitative and quantitative standards, location, capacity of the site and infrastructure to absorb development, existing character of the area, established densities on adjoining sites, protection of residential amenities, proximity to public transport, etc.</p>	<p>The proposed scheme achieves a plot ratio of 0.37 on the land zoned for 'R1' development. The proposed house designs provide for the provision of habitable spaces in the attic area of a number of units, which would increase the plot ratio to 0.41. This is considered to comply with the LAP standards which has a plot area ratio range of 0.10 to 0.50 for residential development.</p> <p>The location of the development site stipulates a low-medium density in the LAP equating to 15-35 dwellings/hectare for inner urban suburbs. In relation to required LAP densities, the proposed development layout achieves 30.94 units/hectare, which is at the higher end of the required density for the site location.</p> <p>The proposed development is responsive to the site context and is in keeping with the existing character, amenity, heritage, environment and landscape of the surrounding area. From a design perspective, the scheme as proposed conforms with the surrounding area in terms of its scale, height, massing, building line and housing mix. The proposed development has been designed to ensure the protection of the residential amenity of adjoining and adjacent residential properties</p>

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
<p>Chapter 3 - Development Policies, Objectives and Guidelines</p>	<p>Policy RD 1 – Residential Development</p>	<p>It is the policy of Galway County Council to support the creation of sustainable communities and high quality residential areas at appropriate locations, with a range of housing options and adequate support services, facilities and amenities.</p>	<p>The proposed development provides for the creation of a high quality, residential development to serve the existing and future needs of Oranmore. The proposed site is zoned as R – Residential (Phase 1) lands and provides a mix of seven different unit type, associated open space, recreational amenities and a childcare facility. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.</p>
<p>Chapter 3 - Development Policies, Objectives and Guidelines</p>	<p>Policy RD 2 – Phased Development on Residential Zoned Lands</p>	<p>It is the policy of Galway County Council to encourage orderly, sequential and phased residential development in accordance with the Preferred Development Strategy and the land use management and zoning provisions set out in this Local Area Plan. This shall include a positive presumption in favour of the sequential development of suitably serviced Residential (Phase 1) lands in order to align the Local Area Plan with the Core Strategy/Settlement Strategy in the current Galway County Development Plan, subject to compliance with the policies and objectives in this Local Area Plan and the principles of proper planning and sustainable development.</p>	<p>The proposed site is zoned as R – Residential (Phase 1) lands. Phase 1 residential lands have been identified for short to medium term growth in suitable locations that are serviceable and accessible.</p>

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<p>Chapter 3 - Development Policies, Objectives and Guidelines</p>	<p>Objective RD1 – Phased Residential Development (Refer to Map 1A/1B Land Use Zoning)</p>	<p>Support the development of lands designated as Residential (Phase 1) within the lifetime of the Local Area 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 the town.</p>	<p>The proposed site is zoned as R – Residential (Phase 1) lands. Phase 1 residential lands have been identified for short to medium term growth in suitable locations that are serviceable and accessible</p>
<p>Chapter 3 - Development Policies, Objectives and Guidelines</p>	<p>Objective RD 2 – Quality Housing Environments</p>	<p>Encourage the development of sustainable residential communities through the promotion of innovative, high quality building design and appropriate layouts, that prioritise walking, cycling and public transport options and provide for a high level of permeability, accessibility and connectivity to the existing built environment, services and facilities. In this regard, future residential development proposals will be in accordance with the principles set out in the DoEHLG document ‘Sustainable Residential Development in Urban Areas 2009’ and its companion document ‘Urban Design Manual: A Best Practice Guide for Planning Authorities 2009’, or any updated version of these documents</p>	<p>An Architectural Design Statement prepared by Simon J Kelly architects provides details in respect of the design principles behind the proposed development. The proposed development provides for a high-quality scheme that respects, responds to and integrates with the immediate and surrounding context.</p>

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
		published during the lifetime of this Plan.	
Chapter 3 - Development Policies, Objectives and Guidelines	Objective RD 3 – Housing Options	Require that a suitable variety and mix of dwelling types and sizes are provided in developments to meet different needs, having regard to demographics and social changes, social inclusion, life time changes, smaller household sizes, lower formation age, immigration, etc.	<p>The proposed development comprises the following house types:</p> <ul style="list-style-type: none"> ▪ 34 no. House Type A (four-bed semi-detached unit) ▪ 54 no. House Type B (three-bed semi-detached unit) ▪ 16 no. House Type C (four-bed detached) ▪ 16 no. House Type D (three-bed terraced unit) ▪ 24 no. House Type E four-bed semi-detached unit) ▪ 50 no. House Type G (25 no. two-bed ground floor duplexes and 25 no. two-bed first/second floor duplexes) ▪ 6 no. House Type H (two-bed duplex apartments) ▪ 12 no. house Type J (two-bed terrace)
Chapter 3 - Development Policies, Objectives and Guidelines	Objective RD 4 – Open Space in Residential Areas	Ensure the provision of adequate areas of high quality, safe and overlooked open space within residential developments and support the provision of play and recreational areas in all new large residential developments.	The LAP requires that a minimum of 15% public/communal open space be provided in residential developments. The proposed scheme provides for 20.22% of public open space (excluding RA Zoned lands) which exceeds the 15% requirement thus satisfying LAP provisions. The proposed scheme provides 29.3% open space when RA zoned lands and the castle zone are included. The proposed public open space is comprised of a high-quality scheme of landscaping, which include areas of formal and informal play and passive amenity areas.
Chapter 3 - Development Policies, Objectives and Guidelines	Objective RD 5 – Social and Affordable Housing	Require that 20% of all new eligible residential sites are set aside for the development of new social and affordable units, unless addressed through suitable alternative arrangements by agreement with the Planning Authority, in accordance with	The applicant proposes to provide the 21 no. units to fulfil their 10% Part V obligation in accordance with Section 95 of the Planning & Development Act 2000 (as amended). Please refer to Dwg 2325-P-033 for details of the location of the proposed units. Estimated calculations and methodology for calculating values for the proposed Part V units are set out in Appendix C .

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		Galway County Council's Housing Strategy 2009-2015 and Part V of the Planning and Development Act 2000 (as amended).	
Chapter 3 - Development Policies, Objectives and Guidelines	DM Guideline RD1 – Open Access Fibre Ducting	Request that all new build residential developments have open access fibre connections installed for high speed technologies, where practicable, in accordance with the Department of Communications Energy and Natural Resources document Recommendations for Open Access Fibre Ducting and Interior Cabling for New Residential Buildings 'Making Homes Fibre Ready', 2011.	The proposed development will be built to comply with DM Guideline RD1.
Chapter 3 - Development Policies, Objectives and Guidelines	Objective CF 3 – Childcare Facilities	Facilitate and promote the development of childcare facilities in suitable locations and in accordance with national policy and the Department of the Environment, Heritage and Local Government 'Childcare Facilities-Guidelines for Planning Authorities' 2001, (or any updated/amended version of this document).	In accordance with the 'Guidelines for Planning Authorities on Childcare Facilities' (DEHLG, 2001), the proposed scheme includes the provision of a childcare facility. The childcare facility is proposed to be located at the western boundary of the site, at the end of the main access road.

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
Chapter 3 - Development Policies, Objectives and Guidelines	Objective CF 5 – Sports, Play and Recreation Facilities	Support the provision of new sports, play and recreational facilities to service the needs of the local community and require the provision of play/recreation facilities in new large residential developments, and facilitate the development of same in other appropriate locations in the town, including supporting public/community initiatives to provide same.	A comprehensive landscaping scheme has been developed which incorporates a playground with specialist timber play equipment and passive amenity areas. The proposed development therefore makes adequate provision for play for a broad range of ages.
Chapter 3 - Development Policies, Objectives and Guidelines	Objective CF 7 – Amenity Network	Support the establishment of an accessible network of greenway linkages and amenities that provide safe and attractive circulation routes for pedestrians and cyclists and for the enjoyment and recreational use of the entire community.	<p>The proposed scheme includes a central area of communal public open space, shared surface paved areas and pedestrian connection links from the main access road through the development</p> <p>The proposed development will contain a 'homezone' environment, in accordance with the principles of the <i>Design Manual for Urban Roads and Streets</i> (DMURS).</p> <p>The scheme proposes new pedestrian links through the RA land at the west of the proposed site to increase permeability.</p> <p>The area of open space provides for active play areas and seating structures, in addition to soft landscaping and passive amenity areas.</p>

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
<p>Chapter 3 - Development Policies, Objectives and Guidelines</p>	<p>Objective CF 8 – Provision of Recreation and Amenity Facilities in Oranhill</p>	<p>Ensure the provision of recreational and amenity facilities as an integral part of any development proposals for Oranhill. Refer to Map 2A/2B – Specific Objectives.</p>	<p>The LAP requires that a minimum of 15% public/communal open space be provided in residential developments. The proposed scheme provides for 17.64% of public open space (excluding RA Zoned lands) which exceeds the 15% requirement thus satisfying LAP provisions. The proposed scheme provides 29.3% open space when RA zoned lands and the castle zone are included. The proposed public open space is comprised of a high-quality scheme of landscaping, which include areas of formal and informal play and passive amenity areas.</p>
<p>Chapter 3 - Development Policies, Objectives and Guidelines</p>	<p>Objective TI 4 – Walking</p>	<p>Facilitate the improvement of the pedestrian environment and network so that it is safe and accessible to all, through the provision of the necessary infrastructure such as footpaths, lighting, pedestrian crossings etc. New development shall promote and prioritise walking, shall be permeable, adequately linked and connected to neighbouring areas, the town centre, recreational, educational, residential and employment destinations and shall adhere to the principles contained within the national policy document Smarter Travel A Sustainable Transport Future 2009-2020, or as updated or with any associated guidance document. See Specific Objectives TI 12, TI 13, TI 14, TI 30 & Refer to Map 2A/2B - Specific Objectives.</p>	<p>Pedestrian and cyclist connections are also incorporated into the design, providing an accessible street network for disable users, walkers and cyclists. The usability of the proposed routes has been optimised by minimising gradients to usable levels and designing all areas to be compliant with relevant regulations and the Design Manual for Roads and Streets (DMURS) policy guidance document. These connections will promote permeability through the proposed development and within the wider area, encouraging walking and cycling in the locality and minimising the need to use private vehicles.</p>

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
<p>Chapter 3 - Development Policies, Objectives and Guidelines</p>	<p>Objective TI 5 – Cycling</p>	<p>Facilitate the improvement of the cycling environment/network so that it is safe and accessible, through the provision of the necessary infrastructure, such as surface treatment, junction treatment, cycle track(s), cycle lane(s), lighting, road crossings etc. New development shall promote and prioritise cycling, shall be permeable, adequately linked and connected to neighbouring areas, the town centre, recreational, educational, residential and employment destinations and shall adhere to the principles contained within the national policy document Smarter Travel A Sustainable Transport Future 2009- 2020, and the National Cycle Policy Framework document or updated/amended guidance document.</p>	<p>Pedestrian and cyclist connections are also incorporated into the design, providing an accessible street network for disable users, walkers and cyclists. The usability of the proposed routes has been optimised by minimising gradients to usable levels and designing all areas to be compliant with relevant regulations and the Design Manual for Roads and Streets (DMURS) policy guidance document. These connections will promote permeability through the proposed development and within the wider area, encouraging walking and cycling in the locality and minimising the need to use private vehicles.</p>
<p>Chapter 3 - Development Policies, Objectives and Guidelines</p>	<p>Objective TI 6 – Bicycle Parking</p>	<p>Seek to provide adequate levels of bicycle parking throughout the Plan area, in accordance with the standards as set out in the current County Development Plan, or as varied/updated, and ensure that new private developments provide safe, secure and sheltered bicycle parking facilities.</p>	<p>Secure cycle parking facilities are proposed throughout the proposed development to encourage non-motorised transport to and from the site. In accordance with section 5.7.7 of the National Cycle Manual, 2 no. spaces are to be provided per terrace and duplex units. Bicycle parking provisions for detached and semi-detached shall be in their individual private open spaces. The minimum number of bicycle parking spaces required for the proposed development, in line with the National Cycle Manual is 146. The required number of parking spaces have been provided on site.</p>

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Chapter 3 - Development Policies, Objectives and Guidelines	Objective TI 8 – Mobility Management Plans	Require Mobility Management Plans for all medium to large scale residential, commercial, mixed use or business/enterprise, industrial, business and technology developments, as appropriate.	Tobin’s Consulting Engineers have prepared a Traffic and Transportation Statement framework in support of the proposed development.
Chapter 3 - Development Policies, Objectives and Guidelines	Objective TI 21 – Road Safety Audits, Traffic Impact Assessment	Require all proposed new commercial, industrial and retail developments and residential development greater than 4 units, or where significant changes are proposed to existing commercial, industrial or larger retail developments, to submit Road Safety Audits and Traffic Impact Assessments as part of their planning application documentation.	Tobin’s Consulting Engineers have prepared a Traffic and Transportation Statement in support of the proposed development.
Chapter 3 - Development Policies, Objectives and Guidelines	Objective UI 1 – Water Supply & Water Conservation	Ensure that new developments are adequately serviced with a suitable quantity and quality of drinking water supply, promote water conservation to reduce the overall level of water loss in the public supply and require that new domestic developments provide for water supply metering.	<p>The water supply required for the proposed development shall be via a 150mm diameter watermain as per Irish Water requirements. A connection to the existing 200mm upvc watermain at the entrance to the Coill Clocha housing estate is proposed. The route for the 150mm watermain from this location to the proposed development will be via the Coill Clocha estate road which has been taken in charge by GCC.</p> <p>An existing Irish Water asset, a 125mm PE watermain, currently serves customers within the Coill Clocha estate; however, The new 150mm water main will be laid offline to avoid disruption to customers currently being served by the existing 125mm watermain.</p>

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
Chapter 3 - Development Policies, Objectives and Guidelines	Objective UI 3 – Wastewater Disposal.	New developments shall only be permitted where it can be clearly demonstrated that they can be serviced and that there is adequate capacity in the wastewater disposal infrastructure in accordance with applicable requirements and standards, including urban wastewater treatment disposal standards, in order to protect the Galway Bay Natura 2000 sites and their respective qualifying interests.	<p>Further information is available in Section 4 of the Report of the Civils Works.</p> <p>It is proposed to discharge via gravity to a pumping station located in the West of the site and then discharge via rising main to the existing public foul sewer Manhole as shown on drg. no. 10402-2005. The existing MH and existing 300mm dia foul sewer is located to the North-east of proposed development. The rising main will discharge to a rising main discharge manhole (as per IW standard Detail CDS-WW-29) prior to entering the existing MH to which the final connection will be made.</p> <p>Further information is available in Section 2 of the Report of the Civils Works.</p>
Chapter 3 - Development Policies, Objectives and Guidelines	Objective UI 5 – Surface Water Drainage and Sustainable Drainage Systems	Maintain, and enhance as appropriate, the existing surface water drainage system throughout the Plan Area and ensure that new developments are adequately serviced with surface water drainage infrastructure and promote the use of Sustainable Drainage Systems in new developments. Surface water runoff from development sites will be limited to pre-development levels and planning applications for new developments will be required to provide details of surface water drainage and	<p>The storm water drainage design has been designed to cater for all surface water runoff from all hard surfaces in the proposed development including roadways, roofs etc. All stormwater generated on site from roadways and roofs will discharge via Oil/Petrol Interceptor to one of 4 no. proposed soakaways which are situated in the centre and west of the site. The stormwater will soak away through soil.</p> <p>Further information is available in Section 3 of the Report of the Civils Works.</p>

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		Sustainable Drainage Systems proposals	
Chapter 3 - Development Policies, Objectives and Guidelines	Objective UI 9 – Climate Change & Air Quality	Continue to implement Galway County Council’s Energy Action Plan regarding energy efficiency and conservation in existing and future buildings, in energy use and procurement activities and in raising awareness and stimulating action within local communities. Promote the preservation of best ambient air quality compatible with sustainable development throughout the Plan Area by seeking to protect and maintain the regulatory standards contained with the EPA’s Air Quality in Ireland 2009 Key Indicators of Ambient Air Quality (Environmental Protection Agency 2010, or any superseding document) and ensure that all air emissions associated with new developments are within Environmental Quality Standards as set out in statutory regulations, namely SI 180/2011 Air Quality Standards Regulations 2011	<p>The proposed scheme is designed to comply with Part L 2008 requirements for energy performance and greenhouse gas emissions. The development is targeting a BER certification of A3.</p> <p>It is envisaged that potential impacts on air quality are most likely during the construction stage of the proposed development. See Chapter 8 of the EIAR for further details</p>

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Chapter 3 - Development Policies, Objectives and Guidelines	Objective UI 10 – Air Purification	Encourage landscaping and deciduous tree planting in an environmentally sensitive manner within the Plan Area as a means of air purification, the filtering of suspended particles and the improvement of Oranmore’s micro- climate.	A comprehensive landscaping plan has been prepared by Cunnane Stratton Reynolds landscape architects. The proposed scheme integrates existing trees on the development sites where appropriate and provides for additional planting as part of a comprehensive landscaping strategy for the site.
Chapter 3 - Development Policies, Objectives and Guidelines	Objective UI 12 – Flood Risk Management and Assessment	Ensure the implementation of the DoEHLG/OPW publication The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 (or any updated/superseding document) in relation to flood risk management within the Plan Area.	The FRA reflects the flood risk of the proposed development in accordance with the DoEHLG/OPW Guidelines “The Planning System and Flood Risk Management – Guidelines for Planning Authorities.
Chapter 3 - Development Policies, Objectives and Guidelines	Objective UI 13 – Flood Zones and Appropriate Land Uses (Refer to Map 3A/3B)	Protect Flood Zone A and Flood Zone B from inappropriate development and direct developments/land uses into the appropriate Flood Zone in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 (or any superseding document) and the guidance contained in DM Guidance UI 1- Flood Zones and Appropriate Land Uses. Where a development/land use is proposed that is inappropriate within the Flood Zone, then the development proposal will need to be	<p>A site-specific FRA prepared by Hydro Environmental Services supports this application (see Appendix 7.1 of the EIAR).</p> <p>The PFRA mapping indicates that there is a small area in the west of the proposed site located in the coastal Flood Zone A (200-year flood zone) and the coastal Flood Zone B (1000-year flood zone). The remainder of the proposed site is located in Flood Zone C – where the probability of flooding is low (less than 0.1% or 1 in 1,000).</p> <p>The CFRAM mapping indicates that there are no areas within the site that are within the tidal Flood Zone A and B. The extent of tidal flood zones ends in the centre of the field to the west of the site.</p>

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
		<p>accompanied by a Development Management Justification Test and Site Specific Flood Risk Assessment in accordance with the criteria set out under with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009.</p>	
<p>Chapter 3 - Development Policies, Objectives and Guidelines</p>	<p>Objective UI 17 – Waste Prevention, Reduction & Recycling</p>	<p>Promote the prevention, reduction and recycling of waste in new developments, new development proposals shall be required to submit proposals demonstrating how this is to be achieved.</p>	<p>Waste storage areas are provided to the front of each of the Duplex units. Recycling facilities will also be provided. Waste collections would typically be undertaken by a specialist contractor, with the timing and frequency agreed to suit the Residence requirements and to respect Health and Safety protocols.</p>
<p>Chapter 3 - Development Policies, Objectives and Guidelines</p>	<p>Objective UI 21 – Energy Conservation & Efficiency</p>	<p>New buildings shall be sustainable in their siting, orientation, design and construction. Passive solar design techniques, high energy efficiency, low impact construction methods and the use of local building materials shall be encouraged to ensure that new developments minimise their environmental impacts and long term costs</p>	<p>The proposed scheme is designed to comply with Part L 2008 requirements for energy performance and greenhouse gas emissions. The development is targeting a BER certification of A3.</p>

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
<p>Chapter 3 - Development Policies, Objectives and Guidelines</p>	<p>Policy UD1 – Urban Design and Landscape</p>	<p>It is the policy of Galway County Council to promote the use of sustainable urban design principles and approaches that will help to create high quality built and natural environments appropriate to the context and landscape setting of the town, having regard to the guidance contained in the Sustainable Residential Development in Urban Areas Guidelines 2009 and the accompanying Urban Design Manual 2009 (or any superseding guidance document).</p>	<p>The architectural inputs into this application have been prepared by Simon J Kelly Architects. An Architectural Design Statement prepared by Simon J Kelly architects provides details in respect of the design principles behind the proposed development. The proposed development provides for a high-quality scheme that respects, responds to and integrates with the immediate and surrounding context:</p> <p>A Landscape Master Plan has also been prepared by Cunnane Stratton Reynolds landscape architects to enhance the proposed development. See Drawing 18223-3-100 Landscape Master Plan</p>
<p>Chapter 3 - Development Policies, Objectives and Guidelines</p>	<p>Objective UD 1 – High Quality, Context Sensitive Design</p>	<p>Ensure that new developments are responsive to their site context and in keeping with the character, amenity, heritage, environment and landscape of the area. New development proposals will be required to complement the existing character of the town centre/area in terms of scale, height, massing, building line, urban grain and definition and through high quality design proposals for buildings/structures/shop fronts, the use of high quality, appropriate materials and the provision of appropriate signage, lighting,</p>	<p>An Architectural Design Statement prepared by Simon J Kelly architects provides details in respect of the design principles behind the proposed development. The proposed development provides for a high-quality scheme that respects, responds to and integrates with the immediate and surrounding context:</p> <p>A Landscape Master Plan has also been prepared by Cunnane Stratton Reynolds landscape architects to enhance the proposed development. See Drawing 18223-3-100 Landscape Master Plan</p>

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
		landscaping proposals and other such details.	
Chapter 3 - Development Policies, Objectives and Guidelines	Objective UD 2 – Public Spaces and Streets	Promote the development of high quality public spaces consisting of streets, squares, parks and amenities connected by a network of pedestrian and cycling routes. Public spaces should have a high standard of design and street furniture that will create a coherent character for the area. This would include appropriately designed and located park benches, bus shelters, cycle storage facilities, refuse bins, signage, street sculpture, etc. but should avoid the over-proliferation of different elements and/or cluttering of public spaces.	<p>The proposed scheme includes a central area of communal public open space, shared surface paved areas and pedestrian connection links from the main access road through the development</p> <p>The proposed development will contain a 'homezone' environment, in accordance with the principles of the Design Manual for Urban Roads and Streets (DMURS).</p> <p>The scheme proposes new pedestrian links through the RA land at the west of the proposed site to increase permeability.</p> <p>The area of open space provides for active play areas and seating structures, in addition to soft landscaping and passive amenity areas.</p>
Chapter 3 - Development Policies, Objectives and Guidelines	Objective UD 4 – Green Network and Landscaping	Support the development of a network of amenities, open spaces and natural areas that support biodiversity, that incorporate existing landscape features such as local rivers, streams, trees, stone walls and hedgerows, that provide pedestrian and cycling linkages and active and passive recreation opportunities, that help to structure and provide relief from the built environment and that can provide areas for surface	The LAP requires that a minimum of 15% public/communal open space be provided in residential developments. The proposed scheme provides for 20.22% of public open space (excluding RA Zoned lands) which exceeds the 15% requirement thus satisfying LAP provisions. The proposed scheme provides 29.07% open space when RA zoned lands and the castle zone are included. The proposed public open space is comprised of a high-quality scheme of landscaping, which include areas of formal and informal play and passive amenity areas.

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		water attenuation and flood risk management.	
	Objective HC 9 – Archaeological Assessment	Ensure that all planning applications for development within close proximity (30m) of Recorded Monuments and Places and any monuments that may be designated as National Monuments, and within Zones of Archaeological Potential are referred to the Department of Arts, Heritage and the Gaeltacht (DAHG) and take account of the archaeological heritage of the area, any advice received from the DAHG and the need for archaeological assessments and, where appropriate, mitigation measures.	<p>An Archaeological Impact Assessment and Pre-Development Testing Survey of the proposed scheme has been completed by Richard Crumlish, B.A., M.I.A.I., Consultant Archaeologist, the results of which are enclosed in Chapter 11 and Appendix 11.1 respectively of the Environmental Impact Assessment Report. A Conservation Management Plan for the site of Moneyduff Castle, prepared by Anne Carey, Historic Buildings Consultant and Richard Crumlish, Consultant Archaeologist, is also enclosed in Appendix 11.2 of the Environmental Impact Assessment Report.</p> <p>An exclusion zone of 20m has been established around the site of Moneyduff Castle (RMP No GA095-084) within which no development shall take place.</p> <p>All recommendations from the assessment are subject to the final approval of the Department of Culture, Heritage and the Gaeltacht.</p>
Chapter 3 - Development Policies, Objectives and Guidelines	Policies Policy NH 1 – Natural Heritage, Landscape and Environment	It is the policy of Galway County Council, to support the conservation and enhancement of natural heritage and biodiversity, including the protection of the integrity of Natura 2000 sites, the protection of Natural Heritage Areas and proposed Natural Heritage Areas and the promotion of the development of a green/ecological network within the Plan Area, in order to support ecological functioning and connectivity, create opportunities	The Landscape Master Plan for the site includes the sowing of a native wildflower seed mix around the western periphery of the site. The implementation of the Landscape Plan will allow for some compensatory habitat creation. The native wildflower meadow will result in the creation of semi-natural meadow habitat. This habitat will be cut once or twice per year to reduce sward height and allow for wildflower establishment. Cutting is to be undertaken early and/or late in the year (March or August/September) to facilitate wildflower germination.

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
		<p>in suitable locations for active and passive recreation and to structure and provide visual relief from the built environment.</p>	
<p>Chapter 3 - Development Policies, Objectives and Guidelines</p>	<p>Objective NH 1 – Natura 2000 Sites</p>	<p>Protect European sites that form part of the Natura 2000 network (including Special Protection Areas and Special Areas of Conservation) in accordance with the requirements in the EU Habitats Directive (92/43/EEC), EU Birds Directive (2009/147/EC), the Planning and Development (Amendment) Act 2010, the European Communities (Birds and Natural Habitats) Regulations 2011 (SI No. 477 of 2011) (and any subsequent amendments or updated legislation) and having due regard to the guidance in the Appropriate Assessment Guidelines 2010 (and any updated/superseding guidance).</p>	<p>An Appropriate Assessment Screening Report and Natura Impact Statement have been prepared by McCarthy Keville O’Sullivan to accompany this planning application.</p> <p>The submitted NIS concludes;</p> <p><i>“It can be concluded, on the basis of objective scientific information, that the proposed development, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site.”</i></p>

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
<p>Chapter 3 - Development Policies, Objectives and Guidelines</p>	<p>Objective NH 2 – Protected Habitats and Species</p>	<p>Support the protection of protected habitats and species listed in the annexes to the EU Habitats Directive 1992 (92/43/EEC) and the Birds Directive (2009/147/EC) and regularly occurring-migratory birds and their habitats, and species protected under the Wildlife Acts. This includes the protection of bats and their roosts, and the maintenance of woodland, hedgerows, treelines, ecological networks and corridors which serve as feeding areas, flight paths and community routes for bats.</p>	<p>An EIAR and an Appropriate Assessment Screening Report/Natura Impact Statement have been prepared by McCarthy Keville O’Sullivan to accompany this planning application.</p> <p>The EIAR notes that based on the findings of the desk study, the species recorded within the site and the habitat composition, the development boundary does not provide significant suitable habitat for protected species.</p>
<p>Chapter 3 - Development Policies, Objectives and Guidelines</p>	<p>Objective NH 3 – Natural Heritage Areas and Proposed Natural Heritage Areas</p>	<p>Protect Natural Heritage Areas and proposed Natural Heritage Areas in accordance with the requirements of the Wildlife Act 1976, the Wildlife (Amendment) Act 2000 and the Planning and Development Act 2000 (as amended). Where a proposed development within the Plan Area may give rise to likely significant effects on any Natural Heritage Area or proposed Natural Heritage Area an Ecological Impact Assessment or an Environmental Impact Assessment, as appropriate, may be required.</p>	<p>An EIAR and an Appropriate Assessment Screening Report/Nature Impact Statement have been prepared by McCarthy Keville O’Sullivan to accompany this planning application.</p>

Chapter	Policy Objective	Development Plan Criteria	Statement of Compliance
<p>Chapter 3 - Development Policies, Objectives and Guidelines</p>	<p>Objective NH 4 – Impact Assessments</p>	<p>Ensure full compliance with the requirements of the EU Habitats Directive (92/43/EEC), SEA Directive (2001/42/EC) and EIA Directive 2011/92/EU and associated legislation/regulations, including the associated European Communities (Birds and Natural Habitats) Regulations 2011 (SI No. 477 of 2011), European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004-2011, Planning and Development (Strategic Environmental Assessment) Regulations 2004-2011 and the European Communities (Environmental Impact Assessment) Regulations 1989-2011 (or any updated/superseding legislation). Planning applications for proposed developments within the Plan Area that may give rise to likely significant effects on the environment may be need to be accompanied by one or more of the following: an Environmental Impact Statement, an Ecological Impact Assessment Report, a Habitats Directive Assessment Screening Report or a Natura Impact Statement, as appropriate.</p>	<p>Between 2016 and 2019, a range of specialist ecological survey work has been undertaken to provide comprehensive information on all ecological aspects of the location of the proposed development and the surrounding area. These surveys included detailed assessment of the site in terms of protected habitats and species. The studies and survey work undertaken provide a comprehensive inventory of the flora and fauna of the study area, the results of which are enclosed in Chapter 5 of the EIAR.</p>

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		<p>Ensure that Natura Impact Statements and any other environmental or ecological impact assessments submitted in support of proposals for development are carried out according to best practice methodologies and contain all necessary baseline assessments.</p>	
<p>Chapter 3 - Development Policies, Objectives and Guidelines</p>	<p>Objective NH 5 – Biodiversity & Ecological Networks</p>	<p>Support the protection of biodiversity and ecological connectivity within the Plan area including woodlands, trees, hedgerows, rivers, streams, natural springs, wetlands, stonewalls, fens, salt marshes, geological and geo-morphological systems, other landscape features and associated wildlife, where these form part of the ecological network. Seek to retain and incorporate these natural features into developments, in order to avoid ecological fragmentation and maintain ecological corridors.</p>	<p>The Landscape Plan for the site includes the sowing of a native wildflower seed mix around the western periphery of the site. The implementation of the Landscape Plan will allow for some compensatory habitat creation. The native wildflower meadow will result in the creation semi-natural meadow habitat. This habitat will be cut once or twice per year to reduce sward height and allow for wildflower establishment. Cutting is to be undertaken early and/or late in the year (March or August/September) to facilitate wildflower germination. Hedgerow and treeline features will be retained where possible, with additional supplementary hedgerows and treeline planting also prescribed in the landscape management plan. Hedgerow tree and shrub species will predominantly comprise of native species, typical of that found in the surrounding environment. This will ensure that connectivity is maintained for commuting and feeding faunal species including birds, bats and invertebrates.</p>
<p>Chapter 3 - Development Policies, Objectives and Guidelines</p>	<p>Objective NH 11 – Summer Botanical Survey for Lands at Moneyduff</p>	<p>Ensure that a Summer Botanical Survey is undertaken and submitted as part of any planning application for development of lands beside the cSAC/pNHA designated site in Moneyduff. Refer to the Map 2A/2B - Specific Objectives.</p>	<p>An account of the field surveys undertaken is provided in Section 5.7 of the EIAR. Detailed botanical data from the assessment of grasslands on the site is provided in Appendix 5-2 of the EIAR.</p>

