

Chief Executive's Report on the Proposed Material Alterations to the Proposed Variation (No. 2) to the Galway City Development Plan 2023-2029

Planning Department
August 2026



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1. Introduction and Overview

1.2 Introduction

This report forms part of the statutory procedure for the material alteration of variation no. 2 to the Galway City Development Plan 2023-2029 (the Development Plan). It addresses the submissions received during the consultation period in relation to the proposed variation.

The purpose of this report is to:

- summarise the written submissions/observations received in relation to the proposed variation during the public consultation period;
- set out the Chief Executive's response to the issues raised in the submissions / observations; and
- make recommendations to the Elected Members on the issues arising from the consultation process.

1.3 Requirements under the Planning and Development Acts

Section 13 of the Planning and Development Act 2000 (as amended) (the 2000 Act) allows for planning authorities to make variations to their development plan. On 31st December 2025, Part 3 of the Planning and Development Act 2024 (the 2024 Act) was commenced which supersedes the provisions of Section 13 of the 2000 Act. However, transitional provisions allow for variations commenced under the 2000 Act can continue under that Act when the relevant provisions of the 2024 Act are commenced. As such this variation, having commenced prior to the commencement of Part 3 of the 2024 Act, can continue under the provisions of the 2000 Act.

Section 13(6) of the 2000 Act provides that members of the authority, having considered the variation and the CE Report may make the resolution with or without further modification, or they may refuse to make it. Where the further modification constitutes a Material Alteration, the planning authority is required to publish a notice of the proposed alteration and any accompanying SEA or AA determination.

This report has been prepared under Section 13(4) of 2000 Act, which requires the Chief Executive to prepare a CE Report on the proposed variations and to include details of any Submissions/Observations received and to give the response of the CE to each submission. The report has been prepared in the context of the proper planning and sustainable development of the area, taking account of the statutory obligations of the Planning Authority and all relevant national and ministerial policies and objectives.

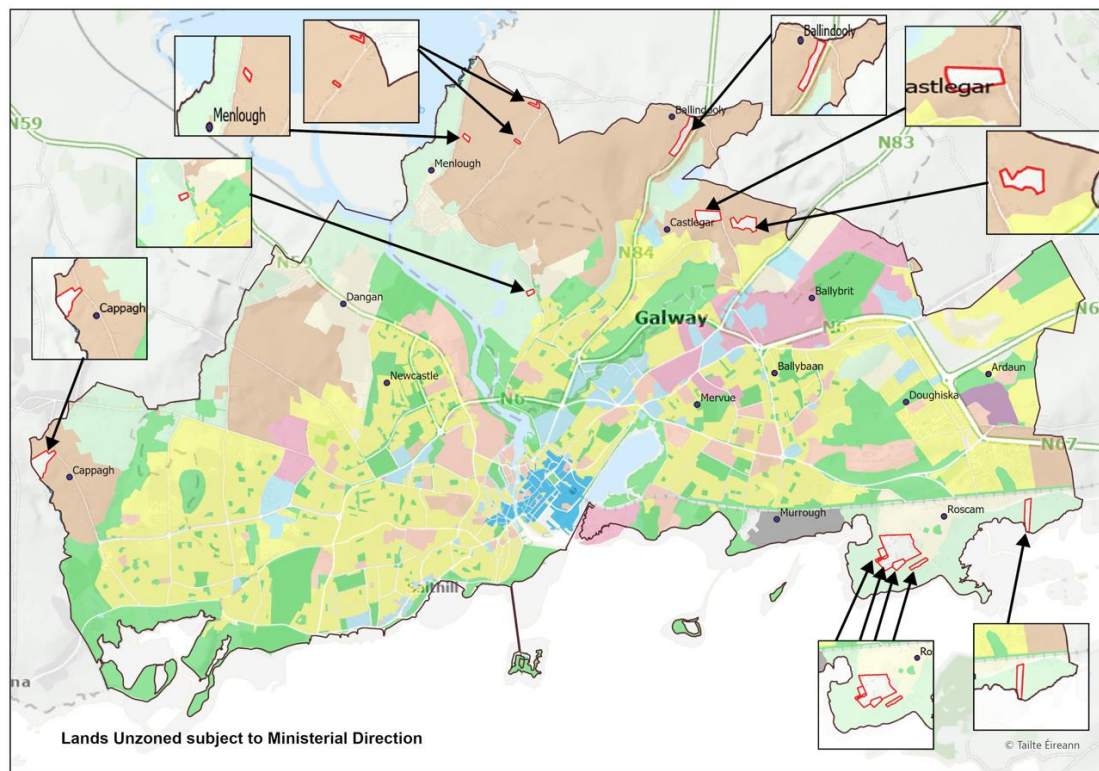
1.4 Context

The lands subject to this material alteration (refer to Section 2 of this report) are currently "unzoned", in accordance with a Ministerial Direction issued on 3rd May 2023 under Section 31 of the Planning and Development Act 2000 (as amended).

Galway City Council (GCC) has proposed under Variation No. 2 to the Galway City Development Plan 2023-2029 to amend the zoning status of 10 no. parcels of land previously "unzoned" under the ministerial direction, as GCC considers it appropriate that all lands in the city are subject to a land use zoning objective. Zoning gives clarity and a level of certainty to

landowners and third parties in considering the current use and possible future development of the subject lands.

The 10 no. “unzoned” land parcels, are identified below on Map No. 1. Variation No, 2 proposed that each parcel of land be rezoned either Agriculture (A) or Agriculture High Amenity (G).



Map 1 - 10 "unzoned" land parcels identified on Galway City Development Plan 2023-2029 Land Use Zoning Map

The proposed Variation was placed on public display for a period of over 5 weeks from 28 November 2025 to 5 January 2026, during which time the Proposed Variation including Screening reports and Determinations for Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) were made available for inspection by the public and submissions were invited. A total of twelve submissions were received during the consultation period.

In accordance with the requirements of Section 13(4)(a) of the 2000 Act, a Chief Executive's report ('CE Report') was prepared which included details of all submissions received and gave the response of the Chief Executive to each submission. The CE Report was furnished to the Elected Members on 30 January 2026.

The Elected Members of Galway City Council having considered the proposed Variation and the associated CE Report resolved at the Plenary Meeting on 9 March 2026 to make modifications to the Proposed Variation. The proposed modifications constitute Material Alterations to the proposed variation. Details of the proposed Material Alterations are set out in Section 2 of this report.

1.5 Next Steps

The Elected Members on receipt of this CE Report are obliged to consider the material alteration and the contents of the CE Report. The 2000 Act requires this to be completed not

later than 6 weeks after the submission of the CE Report to the Members. The Members may then by resolution make the variation with or without the proposed material alterations, or the Members can refuse to make the variation.

The Elected Members are in receipt of the CE Report as of 13th of August 2026. This means that under the relevant legislation the decision whether or not to vary the Plan must be decided within 6 weeks of receipt of the CE Report. It is proposed to be considered at the September 2026 Plenary Meeting.

In advance of a decision on the material alterations to the variation, it is a statutory requirement to determine if a Strategic Environmental Assessment (SEA) and/or an Appropriate Assessment (AA) are required. In this content, where material alterations have been proposed), the Chief Executives Response and Recommendation is set out (as detailed in Section 2 below). The Chief Executive's Recommendations have been considered by the ongoing SEA and AA processes that are being undertaken alongside the preparation and making of the Variation and it has been confirmed that they would not give rise to any likely significant effect on the environment or any European Site.

2. Proposed Material Alterations

The proposed Material Alterations comprise:

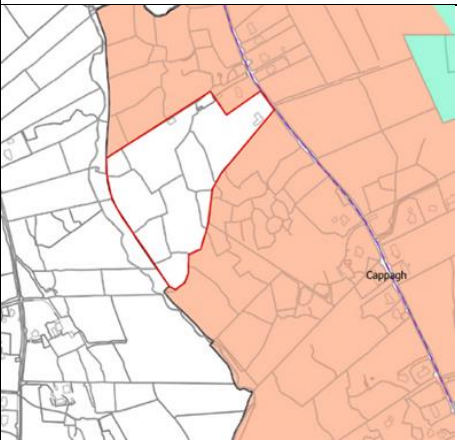
- Rezone lands at Cappagh Road (site 1) from unzoned to Residential (R)
- Rezone lands at Coolagh Road (site 3) from unzoned to Agriculture (A)
- Rezone lands at Roscam (site 9a) from unzoned to Agriculture (A)
- Rezone lands at Roscam (sites 9b, 10a, 10b) from unzoned to Residential (R) and apply Specific Objectives
- Rezone lands at Roscam (site 10c) from unzoned to Residential (R2) and apply a Specific Objective

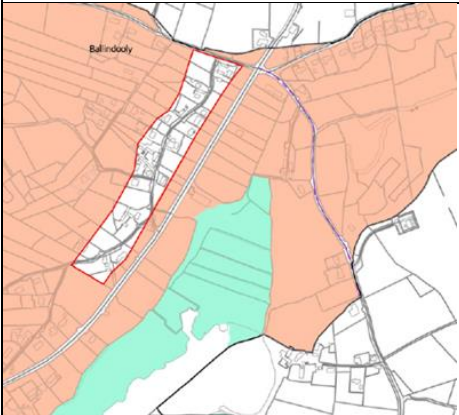
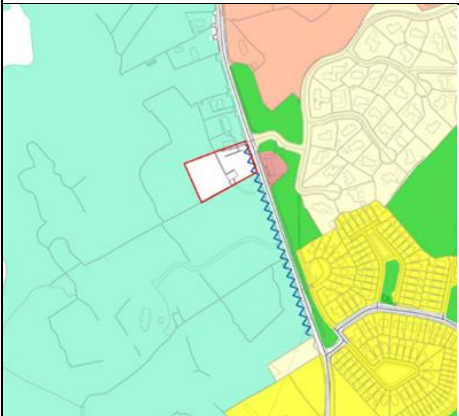
No changes were proposed to sites 2, 4, 5, 6, 7, and 8.

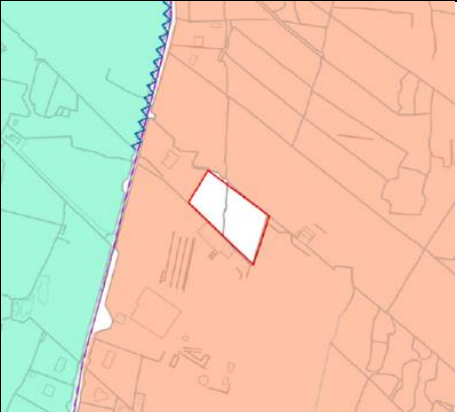
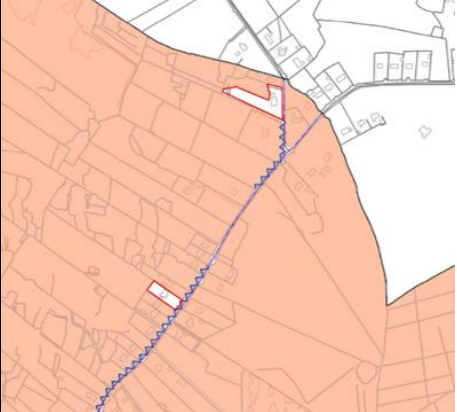
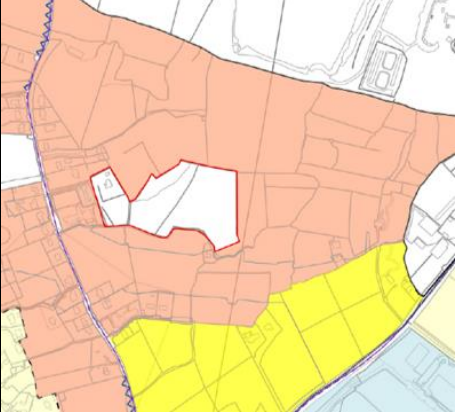
2.2 Chief Executive's Response to the Proposed Material Alterations

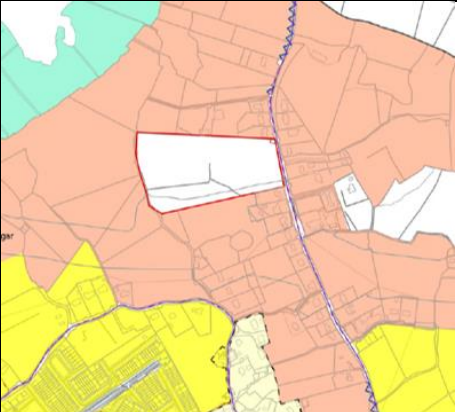
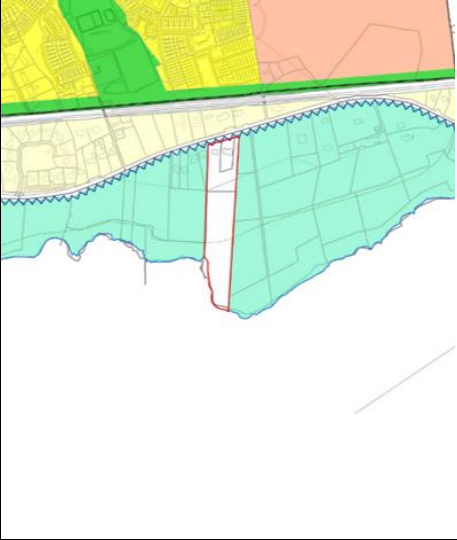
Table 1 sets out the variations to the Galway City Development Plan 2023-2029 as originally proposed in Variation No. 2 as well as the Material Alterations proposed by elected members at their meeting of 9 March 2026. For the sites where material alterations have been proposed, the Chief Executives Response and Recommendation is set out. The Chief Executive's Recommendations have been considered by the ongoing SEA and AA processes that are being undertaken alongside the preparation and making of the Variation and it has been confirmed that they would not give rise to any likely significant effect on the environment or any European Site.

Please note that the parcels of land referenced as 9 and 10 in the original CE Report have been subdivided to provide clarity on the proposed Material Alterations to those areas of land.

Variation 2 - Proposed Variations and Material Alterations			
	Lands	Area	Proposed Variation/Material Alteration
1.	Cappagh Road		
		4.72ha	Recommendation as per Proposed Variation published 28/11/25: Rezone to Agriculture (A) Proposed Material Alteration: Rezone to Residential (R)
	Chief Executives Response to the Proposed Material Alteration		

	Due to location at a remove from the existing built up area, to the lack of existing water, wastewater services for a development of scale, to the capacity of the road network and lack of footpaths and lighting in the area and having regard to the principles of Compact Growth outlined in NSO 1 of the NPF, this proposed material alteration is considered to be contrary to the proper planning and sustainable development of Galway City. It is recommended that the Variation is made without this proposed Material Alteration.		
2.	Ballindooley 	4.128ha	Recommendation as per Proposed Variation published 28/11/25 Rezone to Agriculture (A) Proposed Material Alteration: No Alteration (as per original proposal)
3.	Coolagh Road 	0.476ha	Recommendation as per Proposed Variation published 28/11/25 Rezone to Agriculture High Amenity (G) Proposed Material Alteration: Agriculture (A)
Chief Executives Response to the Proposed Material Alteration It is noted that the site falls away from the roadside boundary and that the site could accommodate considered development without interfering with the protected view, subject to all of the usual planning policy and siting considerations. No further comment or objection.			

4.	Quarry Road Menlo		0.47ha	Recommendation as per Proposed Variation published 28/11/25 Rezone to Agriculture (A) Proposed Material Alteration: No Alteration (as per original proposal)
5.	Two sites on Monument Road Menlo		Northern lands: 0.45ha Southern lands: 0.2ha	Recommendation as per Proposed Variation published 28/11/25 Rezone to Agriculture (A) Proposed Material Alteration: No Alteration (as per original proposal)
6.	Off School Road Castlegar		3.70ha	Recommendation as per Proposed Variation published 28/11/25 Rezone to Agriculture (A) Proposed Material Alteration: No Alteration (as per original proposal)

7.	School Road Castlegar		3.99ha	Recommendation as per Proposed Variation published 28/11/25 Rezone to Agriculture (A) Proposed Material Alteration: No Alteration (as per original proposal)
8.	Coast Road		2.39ha	Recommendation as per Proposed Variation published 28/11/25 Rezone to Agriculture High Amenity (G) Add Specific Objective: In compliance with the Flood Risk Management Guidelines, uses under the Agriculture High Amenity (G) zoning objective at this site shall be limited to water compatible uses in Flood Zone A, and less vulnerable or water compatible uses in Flood Zone B subject to site specific flood risk assessment. Proposed Material Alteration: No Alteration (as per original proposal)
9a.	Roscam		Northern lands: 0.95ha	Recommendation as per Proposed Variation published 28/11/25 Rezone to Agriculture High Amenity (G) Proposed Material Alteration: Rezone to Agriculture (A)
Chief Executives Response to the Proposed Material Alteration				
Any proposals on these lands will be subject to assessment regarding siting and design, as well as all relevant planning policy considerations. No further comment or objection.				

9b.	 Southern lands: 1.145ha Recommendation as per Proposed Variation published 28/11/25 Rezone to Agriculture High Amenity (G) Proposed Material Alteration: Rezone to Residential (R) Add Specific Objective: Rezone to R for development of maximum 3 units subject to connection to water and wastewater services and subject to proper planning and sustainable development.
Chief Executives Response to the Proposed Material Alteration The required connection to water and wastewater services is noted and it is acknowledged that the extension of the network in the area would provide opportunity to connect for existing properties. However, having regard to the lack of other services including public lighting and footpaths and principles of Compact Growth outlined in NSO 1 of the NPF, it is recommended that the Variation is made without this proposed Material Alteration.	
10a.	 0.88ha Recommendation as per Proposed Variation published 28/11/25 Rezone to Agriculture (A) Proposed Material Alteration: Rezone to Residential (R) Add Specific Objective: Rezone to R for a maximum 3 units subject to connection to water and wastewater services and subject to proper planning and sustainable development.
Chief Executives Response to the Proposed Material Alteration The required connection to water and wastewater services is noted and it is acknowledged that the extension of the network in the area would provide opportunity to connect for existing properties. However, having regard to the lack of other services including public lighting and footpaths and principles of Compact Growth outlined in NSO 1 of the NPF, it is recommended that the Variation is made without this proposed Material Alteration.	

10b.	Roscam		1ha	Recommendation as per Proposed Variation published 28/11/25 Rezone to Agriculture (A) Proposed Material Alteration: Rezone to Residential (R) Add Specific Objective: Rezone to R for a maximum of 12 units, subject to connection to water and wastewater services and subject to proper planning and sustainable development.
Chief Executives Response to the Proposed Material Alteration				
The required connection to water and wastewater services is noted and it is acknowledged that the extension of the network in the area would provide opportunity to connect for existing properties. However, having regard to the principles of Compact Growth outlined in NSO 1 of the NPF, it is recommended that the Variation is made without this proposed Material Alteration.				
10c.	Roscam		Southern lands: 0.91ha	Recommendation as per Proposed Variation published 28/11/25 Rezone to Agriculture (A) Proposed Material Alteration: Rezone to Residential (R2) Add Specific Objective: Rezone to R2 for a maximum of one unit subject to proper planning and sustainable development.
Chief Executives Response to the Proposed Material Alteration				
It is noted that the proposal is to allow for one additional unit subject to site suitability assessment. Having regard to the lack of available services, including footpaths, lighting and the rural character of the area, it is recommended that the Variation is made without this proposed Material Alteration.				

10d.	Roscam		Northern lands: 10.8ha Recommendation as per Proposed Variation published 28/11/25 Rezone to Agriculture (A) Proposed Material Alteration: No Alteration (as per original proposal)
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Table 1 - Proposed Material Alterations to the proposed Variation No. 2

2.3 Material Alterations Consultation Process

Notice of the proposed material alterations to the proposed variation was published in the Galway Advertiser and online on 19 June 2026 and sent to the Office of the Public Regulator, the Regional Assembly and the Minister for Housing, Local Government & Heritage and other prescribed bodies in accordance with section 13 of the 2000 Act. Documents were made available online, and hard copies were on public display at City Hall and a number of libraries and community centres around Galway City.

The consultation period for the material alteration was between the 19 June 2026 and 16 July 2026. The aim of this consultation was to enable the public and interested parties to give their observations on the proposed variation.

A total of 17 submissions were received during the consultation period with respect to the proposed material alterations. Table 2 below lists the submission references and name of each person/organisation who made submissions. Section 3 of this report gives summaries of the submissions and the response of the Chief Executive to any issues raised.

2.4 List of Submissions to the Proposed Material Alterations

Submission Reference	Name of the Person/Organisation
GLWC-C42-1	Health and Safety Authority
GLWC-C42-2	Maritime Area Regulatory Authority
GLWC-C42-3	Environmental Protection Agency
GLWC-C42-4	Office of Planning Works
GLWC-C42-5	National Transport Authority
GLWC-C42-6	Declan & Bernadette Ashe
GLWC-C42-7	Save Roscam Peninsula
GLWC-C42-8	Irish Water
GLWC-C42-9	Farry Town Planning Ltd
GLWC-C42-10	Liam Dilleen
GLWC-C42-11	James McCarthy
GLWC-C42-12	Damian Lavelle, Proofridge Ltd
GLWC-C42-13	Office of Public Works
GLWC-C42-14	Údarás na Gaeltachta
GLWC-C42-15	Transport Infrastructure Ireland
GLWC-C42-16	Office of the Planning Regulator
GLWC-C42-17	Department of Housing, Local Government and Heritage

Table 2 - List of submissions received

3. Submission Summaries and Chief Executive's Response and Recommendations

Summaries of the submissions received in respect of the material alterations to Variation No. 2 are set out below followed by the response and recommendation of the Chief Executive.

Reference	GLWC-C42-1
Submission By	Health and Safety Authority (HSA)
Submission Summary	The HSA have outlined their role in relation to Development plans, and their role in relation to land use planning. They mentioned that the HSA would expect the planning guidelines to contain Planning policy guidance for major accident hazard sites under regulations aligned with Article 13 of Directive 2012/18/EU. • Consultation distances and advice from the HSA to Galway City Council, shown on relevant maps, including any specific guidance. • Policy on siting new major hazard sites, considering Article 13 and the Authority's development policies. • Reference to notified establishment: Circle K Galway Terminal, Galway Harbour, New Docks, Galway.
Response	Noted
Recommendation	It is recommended that Variation No.2 be made without the proposed Material Alterations, as referenced in Table 1 above.

Reference	GLWC-C42-2
Submission By	Maritime Area Regulatory Authority (MARA)
Submission Summary	MARA have noted that the council are seeking to rezone lands that were previously unzoned as it considers it appropriate that all lands are given a land use zoning objective and it gives clarity and a level of certainty to landowners and third parties in considering current and future development potential of the subject lands. The submission mentions that MARA is a prescribed body under the Act and a copy of the Variation must be sent to them once adopted. They mentioned MARA's functions and responsibilities within the maritime area which includes assessing applications for the maritime area, compliance and enforcement of maritime area consent and maritime usage licences applications, investigating and prosecuting, and fostering and promoting co-operation between regulators of the maritime area. MARA notes that there is no material alterations proposed for lands or sites located directly within the maritime area. They also note that uses should maximise coexistence with established activities in marine areas should be consistent with marine planning policies set out in the National Marine Planning Framework (NMPF).

	They mention that Galway City Council, as a coastal planning authority, must ensure its development plan aligns with the (NMPF) and conduct environmental assessments accordingly. Any development within the maritime area, including flood defences or Part 8 projects, generally requires a Maritime Area Consent (MAC), unless the land is privately owned or already leased/licensed. MARA is available to advise the Coastal Planning Authority on these matters.
Response	Noted. Galway City Council (GCC) will determine whether the proposed Variation would or would not be likely to have significant effects on the environment and, in so doing, GCC will take account of relevant criteria set out in Schedule 2A ' <i>Criteria for determining whether a plan is likely to have significant effects on the environment</i> ' of the Planning and Development (SEA) Regulations, as amended.
Recommendation	It is recommended that Variation No.2 be made without the proposed Material Alterations, as referenced in Table 1 above.

Reference	GLWC-C42-3
Submission By	Environmental Protection Agency (EPA)
Submission Summary	The EPA's submission acknowledges the notice in relation to the proposed Material Alteration to Variation No.2, and they outline the role they play as an SEA environmental authority. The EPA provide a guidance document that sets out key recommendations for integrating environmental considerations into Local Authority land-use plans. It is stated that the Variation, as amended, should align with proper planning and sustainable development, as well as needing to align with national commitments on climate change mitigation and adaptation. The EPA note, that once the Variation is adopted, an SEA statement should be prepared summarising how environmental considerations were integrated, how submissions, observations and consultations were taken into account, the reasons for the variation and the measures for monitoring environmental effects.
Response	Noted.
Recommendation	It is recommended that Variation No.2 be made without the proposed Material Alterations, as referenced in Table 1 above.

Reference	GLWC-C42-4
Submission By	Office of Public Works (OPW)
Submission Summary	The OPW's submission relates to concerns around flooding and flood risk management. They mention NPO 78 in the revised version of the NPF 2025, with reference to the Cappagh Road site (Site No. 1) and the material alteration wishing to zone the site as Residential instead of Agriculture. The submission mentions that there is no flood risk data

	available for a nearby watercourse that is not included in national flood mapping programs. They outline the three stages of the flood risk assessment, the initial identification of potential flood issues. These being identifying flood risk, initial flood risk assessment and a detailed flood risk assessment. The submission mentions if flood risk is suspected but information is insufficient, a more detailed Stage 3 assessment is required, especially for land zoning decisions. They mention that as Galway City Council is proposing to zone lands, they must conduct a stage 3 flood risk assessment to inform the land use zoning, the SFRA and planning decisions. This will ensure appropriate planning and flood risk management for the area.
Response	This is noted in the context of the Office of the Planning Regulator's MA Recommendation 3, which raises the same concern regarding the unmapped watercourse. This site and potential sources of fluvial flooding were examined as part of the SFRA, undertaken alongside the Proposed Variation. It was determined that the site is situated within Flood Zone C – therefore Stage 3 SFRA was not required.
Recommendation	It is recommended that Variation No.2 be made without the proposed Material Alteration for Site No.1, as referenced in Table 1 above.

Reference	GLWC-C42-5
Submission By	National Transport Authority (NTA)
Submission Summary	The NTA have notified Galway City Council that they have reviewed the proposed Material Alteration to Variation No.2. They have noted that the council have rezoned sites that are currently unzoned under the ministerial direction, and the purpose of rezoning these sites is to give landowners and third parties clarity and a level of certainty in considering the current use and possible future development of the subject lands. The NTA recommends that site no.1 at Cappagh Road not be rezoned residential and instead be rezoned as Agriculture due to the subject lands being at the periphery of the plan boundary in a location surrounded by agricultural lands and away from existing or proposed development areas and services. They further mentioned how rezoning this site would not represent compact or sequential development and would be wholly car dependent, therefore not in the interests of proper planning and sustainable development. The NTA refers to sites 9b, 10a, 10b and 10c located in Roscam and notes that these sites are located away from existing services and are not located in close proximity to public transport and are not appropriately accessible by walking and cycling. The NTA believes that

	Rosshill Road should be upgraded for walking, cycling, and traffic before more housing is built
Response	Noted. The Chief Executive's assessment, as outlined in Table 1 of this report, indicates that the material alteration on site no.1 at Cappagh Park is contrary to proper planning and sustainable development of the city. This is due to its remote location from the existing built-up area, the lack of water and wastewater services suitable for a development of this scale, limited capacity of the road network, and the absence of footpaths and lighting in the area, all of which conflict with the principles of Compact Growth outlined in NSO 1 of the NPF. The chief executive's assessment indicates that the material alteration on site 9b, 10a and 10b should not go-ahead having regard to the lack of services including public lighting and footpaths and principles of Compact Growth outlined in NSO 1 of the NPF. The chief executive's assessment of site 10c indicates that the material alteration should not go-ahead having regard to the lack of available services, footpaths, lighting and the rural character of the area.
Recommendation	It is recommended that Variation No.2 be made without the proposed Material Alterations, as referenced in Table 1 above.

Reference	GLWC-C42-6
Submission By	Declan & Bernadette Ashe
Submission Summary	The submission wishes to make aware that there appears to be "an error" in the wording of 10 (c), and it is believed that the error could prevent the approval of their plan to build a home on their land. It is stated that Elected Members had voted to rezone their land to R2, to permit an additional unit on site, but the wording in question suggests only one unit. It is believed that this contradicts the council original intent. The landowners mentioned that they contacted the Planning department, and they have requested a correction in the wording, to include the word 'additional' to reflect the original decision. They believe this wording error may block their plans to develop an additional unit on site and they are proposing that this correction be made at the next Plenary meeting without further material alteration. They are supportive of the material alteration provided the wording is amended to allow for an additional unit. The submission gives further background noting that the Ashes' land had been zoned R2 (residential) since 2005, but the Ministerial Direction in May 2023 stripped this zoning and left the land Unzoned. They point to a similar case, Ballindooley Developments Ltd v Minister for Housing, Local Government and Heritage & Ors [2023/745 JR], where the High Court struck down a comparable Ministerial Direction and ordered the Council to restore the original zoning. Their argument is that the Council

	should have done the same for their land but instead proposed to zone it Agriculture/High Amenity, and unlike a developer such as Ballindoooley, they do not have the means to challenge this in court themselves.
Response	Noted; The Chief Executive's assessment is that the proposed Material Alteration to site 10c is contrary to the principles of Compact Growth under NSO 1 of the National Planning Framework, having regard to the lack of available services and the rural character of the area. The Executive's recommendation is that Variation No. 2 be made without this Material Alteration, and that the land instead be zoned Agriculture (A), as originally proposed. This is also consistent with the Office of the Planning Regulator's MA Recommendation 1, which recommends that the Variation be made without the Material Alteration to Site 10c. The submission's observation that the published wording ("a maximum of one unit") does not capture the Elected Members' intended decision of 9th March 2026 to permit one additional unit is noted, along with the correspondence with the Planning Department at Appendix 1. As the Executive's recommendation is that the Variation be made without this Material Alteration, the drafting of its wording does not arise for determination in this report. Should the Elected Members resolve to proceed with the Material Alteration notwithstanding this recommendation, it is recommended that any such resolution should clarify the wording to refer to "one additional unit," consistent with the record of the March Plenary Meeting.
Recommendation	It is recommended that Variation No. 2 be made without the proposed Material Alteration to site 10c, and that the land be zoned Agriculture (A) as originally proposed, consistent with the Chief Executive's Table 1 assessment on Compact Growth (NSO 1) grounds. In the event the Elected Members instead resolve to proceed with Material Alteration 10c, it is recommended that the wording be clarified to refer to a maximum of one additional unit, to reflect the decision of the Plenary Meeting of 9th March 2026.

Reference	GLWC-C42-7
Submission By	Save Roscam Peninsula
Submission Summary	Save Roscam Peninsula objects to the Material Alterations to sites 9b, 10a, 10b and 10c at Roscam, which would rezone the lands from Unzoned to Residential (R) or Residential (R2), contrary to the Chief Executive's original recommendation of Agriculture (A) or Agriculture and High Amenity (G). The submission requests that all four Material Alterations be rejected, on the following grounds: Adequacy of reasons: The elected members have not given clear, individualised planning reasons for departing from the Chief Executive's

	recommendation on sites 9b, 10a, 10b and 10c, as required by law (citing, inter alia, <i>Christian v Dublin City Council</i> (No 1) [2012] 2 IR 506, <i>Killegland Estates Ltd v Meath County Council</i> [2023] IESC 39, <i>Mallak v Minister for Justice</i> [2012] IESC 59, <i>Connelly v An Bord Pleanala</i> [2018] IESC 31 and <i>Balz v An Bord Pleanala</i> [2019] IESC 83). It submits that a single generic reason in the consultation notice cannot substitute for reasons specific to each site/ownership. Alleged conflict of interest: The submission alleges that familial and interlocking commercial relationships between decision-makers and parties who stand to benefit from the rezonings give rise to a perceived and/or actual conflict of interest, referencing s.166 and Part 15 of the Local Government Act 2001 and the Code of Conduct for Councillors. No specific individual or relationship is named. Consistency with core strategy and Ministerial Direction: The submission contends that rezoning sites 9b, 10a, 10b and 10c to residential is inconsistent with the Plan's core strategy and the NPF/RSES 50% compact growth target, and re-introduces the zonings struck out by the s.31 Ministerial Direction of 3rd May 2023. It notes the sites remain unserviced (citing the Uisce Eireann submission of 13th April 2022) and contrasts this with the treatment of other R2 lands at Roscam rezoned to Agriculture under Variation No.1, and with the residential yield already secured through Variation No.3 (sites A56/A57, cited as 500–700 units). Site-specific objections: For each of the following, the submission objects on grounds including the protected panoramic view (V.9), lack of water/wastewater services, karst hydrogeology and proximity to the Galway Bay Complex SAC/Inner Galway Bay SPA, proximity to registered monuments and protected structures, and prior refusals of planning permission on or near the site: • Material Alteration 9b (1.145ha) – objects to R zoning, max. 3 units; cites <i>Madden v An Bord Pleanala</i> [2022] IEHC 257 (leave to seek judicial review of a related ABP refusal was refused). • Material Alteration 10a (0.88ha) – objects to R zoning, max. 3 units; site cited as c.180m from the Galway Bay SAC and close to the Inner Galway Bay SPA. • Material Alteration 10b (1ha) – objects to R zoning, max. 12 units; cites karst ground conditions and a prior percolation area/enforcement issue on the site. • Material Alteration 10c (0.91ha) – objects to R2 zoning, max. 1 unit; cites a 2009 ABP refusal (PL.61.232894) for three units on visual/monument-proximity grounds. Appropriate Assessment (AA) Screening: The submission asserts that the AA Screening Report and Determination (CAAS Ltd, March 2026 – Appendix 2) is legally defective, raising six grounds:
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	(1) an inadequate in-combination assessment that omits Variation No.3's adjoining c.500–700 unit yield; (2) unlawful reliance on mitigation measures at screening stage, contrary to People Over Wind & Sweetman v Coillte (C-323/17); (3) application of an incorrect “no additional source versus the parent Plan” test rather than the Waddenzee (C-127/02) precautionary “cannot be excluded” standard; (4) impermissible tiering/deferral of assessment to the parent Plan's AA and to future project stage; (5) generic, boilerplate reasoning that it submits fails the Connelly v An Bord Pleanála [2018] IESC 31 “complete, precise and definitive” standard; (6) failure to exclude specific effects (foul wastewater loading, karst groundwater pathways, disturbance to SPA qualifying bird species) on the Galway Bay Complex SAC and Inner Galway Bay SPA. Strategic Environmental Assessment (SEA): The submission asserts the SEA is defective in that it identifies significant adverse effects for sites 1, 9b, 10a, 10b and 10c without proposing mitigation measures; applies an identical, undifferentiated effects assessment across sites of markedly different scale (1 to 12 units); contains internal inconsistencies (including boilerplate referencing “the town” and Variation No.3 housing-supply text); and relies on a single Mutton Island WWTP headroom figure without assessing local network conveyance capacity, notwithstanding acknowledged capacity constraints and reported non-compliant storm overflows and water quality deterioration at Grattan Beach.
Response	Noted; Core Strategy & Site-Specific details: The Chief Executive's assessment is that the proposed Material Alterations to sites 9b, 10a, 10b and 10c are contrary to the principles of Compact Growth under NSO 1 of the National Planning Framework, having regard to the lack of available services and the rural character of the area. The Executive's recommendation is that Variation No. 2 be made without these Material Alterations. This directly addresses the submission's core request and, together with the environmental review below, substantially answers its Appropriate Assessment, SEA and site-specific concerns. Appropriate Assessment and SEA Screening: The Council's environmental consultants, have reviewed the submission's assertions that the AA Screening and the SEA are defective and confirm that neither is defective. The Screening for Appropriate Assessment has been undertaken in compliance with the Habitats Directive and transposing legislation; it

	concludes that the Proposed Material Alterations to Proposed Variation No. 2 are not foreseen to have any likelihood of significant effects on any European site, alone or in combination with other plans or projects, and that any potential for a significant effect on the Galway Bay Complex SAC or Inner Galway Bay SPA can accordingly be ruled out. The Strategic Environmental Assessment has likewise been undertaken on the Proposed Variation in compliance with the SEA Directive and transposing Regulations; the SEA Environmental Report details the findings of the assessment, including the mitigation measures that lower tiers of decision-making will be required to comply with, with lower tier plans and projects subject to their own environmental assessment processes as relevant. No amendments to the AA Screening Report or the SEA Environmental Report are recommended arising from this submission. Reasons and conduct: The submission's observations on the adequacy of reasons for any Members' departure from the Chief Executive's recommendation and the alleged conflict of interest are noted for the attention of the Elected Members.
Recommendation	It is recommended that Variation No. 2 be made without the proposed Material Alterations to sites 9b, 10a, 10b and 10c, and that the lands be retained in Agriculture (A) / Agriculture and High Amenity (G) zoning as originally proposed. This is also consistent with the Office of the Planning Regulator's MA Recommendation 1, which recommends that Variation No. 2 be made without the Material Alterations to sites 9b, 10a, 10b and 10c on the same Compact Growth and servicing grounds. Having regard to the consultant's confirmation that the AA Screening and the SEA are not defective, no amendments to the AA Screening Report or the SEA Environmental Report are recommended arising from this submission.

Reference	GLWC-C42-8
Submission By	Uisce Eireann
Submission Summary	Uisce Eireann's comments on the proposed material alteration, includes an update water and wastewater services, as well as comments on specific Proposed Material Alterations as referenced. The first part of the submission discusses how water and wastewater capacity registers were issued for each settlement in the county, reflecting current treatment capacities. These updates consider capacities from planned capital investments expected to be completed between 2025 and 2029, although Uisce Eireann notes that these plans and timelines may change due to funding, statutory delays, or emerging needs. If water demand increases significantly, capacity will be reassessed, and additional projects can be initiated if funding becomes

	available. Uisce Eireann developed a guidance document and have given a link to this document on their submission. Uisce Eireann mentioned that they have commented on the serviceability of sites on each stage of the development plan process. In relation to Site No.1 on the Cappagh Road, it is stated that the nearest sewer is >1km away from the lands and there is a 150mm water main in the adjacent public road, Cappagh Road. Uisce Eireann have no comment regarding sites 2 to 8 and 9a and 10d. Regarding Sites 9b, 10a, b and c they note that there is no public sewer in the vicinity of these lands and there is a water network adjacent to the lands although a capacity network may be required.
Response	Noted. The Chief Executive's assessment, as outlined in Table 1 of this report, indicates that the material alteration on site no.1 at Cappagh Park is contrary to proper planning and sustainable development of the city. This is due to its remote location from the existing built-up area, the lack of water and wastewater services suitable for a development of this scale, limited capacity of the road network, and the absence of footpaths and lighting in the area, all of which conflict with the principles of Compact Growth outlined in NSO 1 of the NPF. The chief executive assessment indicates that the material alteration on site 9b should not go ahead having regard to the lack of services including public lighting and footpaths and principles of Compact Growth outlined in NSO 1 of the NPF. The chief executive's assessment of site 10a, indicate that the material alterations should not go ahead having regard to the lack of other services including public lighting and footpaths and principles of Compact Growth outlined in NSO 1 of the NPF. The Chief executive's assessment of site 10b indicates that the material alteration should not go ahead having regard to the principles of Compact Growth outlined in NSO 1 of the NPF. The Chief Executive's assessment of site 10c indicates that the material alteration should not go ahead having regard to the lack of available services, footpaths, lighting and the rural character of the area.
Recommendation	It is recommended that Variation 2 be made without the proposed material alterations to sites no.1, 9b, 10a, 10b and 10c, as referenced in Table 1 above.

Reference	GLWC-C42-9
Submission By	Farry Town Planning Ltd
Submission Summary	The submission is written on behalf of Ceaphach Developments Ltd. The submission is referring to the Cappagh Road site that is proposed to be rezoned as residential which is fully supported by the submitter. They mentioned that the site was originally zoned as residential in the previous development plan, however, plans for housing construction on this land for the next development plan was deleted by the Minister for

	Housing meaning the zoning objective was deleted and it was therefore unzoned. They note that they are aware that the alteration to the Variation is proposing to zone this site as Residential however if negative recommendations on zoning this site is made they have listed several reasons and recommendations on why it should be rezoned for residential. Total Housing Need: The submission mentions that there is a greater need for housing in this current time then there was when the demographic forecasts in the National Planning Framework were in force. Residential Density: The LDR zoning of this land in 2022 was opposed by the OPR because a maximum density of 2.5-5 dwelling per hectare was set out in the draft development plan. Proposed Material Alterations to Variation No. 2 seeks to 'rezone the lands rather than ascribe development thresholds. The 'LDR' designation has not been carried forward and therefore the aforementioned difficulty does not arise. The Agricultural Value of the Property: The submission mentions the poor soil quality of the land and its rocky scrubland character is only capable of producing berries and any suggestion of it being used for farming activity is illogical. Service Provision: The submission mentions that they believe rezoning this site as Residential follows a sequential approach to developments as they believe it is in close proximity to existing services and amenities. They believe that the OPR recommendations of encouraging low density housing as undermining the development potential of the city as being contradictory to the National Policy Objective 3b which <i>“seeks to deliver at least half of all new homes that are targeted in the five cities and suburbs within their existing built-up footprints.”</i> They believe that the rezoning of this site to residential does not breach strategic policy.
Response	Noted; The Chief Executive's assessment is that the proposed Material Alteration to rezone Site 1, Cappagh Road, Knocknacarra to Residential (R) is considered contrary to the proper planning and sustainable development of Galway City, having regard to the site's location at a remove from the existing built-up area, the lack of existing water and wastewater services for a development of scale, the capacity of the road network, and the lack of footpaths and lighting in the area, and having regard to the principles of Compact Growth under NSO 1 of the National Planning Framework. The updated national population projections and headroom methodology, and the submission's position on residential density and agricultural land value, are noted, but do not alter the site-specific location and service deficits identified above, which remain the primary basis for the Executive's recommendation. The Galway City Ring Road

	and Lenabower/Cappagh park-and-ride approvals cited in support of serviced status are noted; however, both remain subject to ongoing legal proceedings or appeal, and neither demonstrates that the site currently has the water, wastewater, footpath and lighting infrastructure necessary to support residential development of scale. The submission's reliance on NPO 3b is also noted; the Executive's assessment is grounded in the Compact Growth principles of NSO 1 rather than the headroom allowance under NPO 3b. This assessment is also consistent with the Office of the Planning Regulator's MA Recommendation 1, which similarly recommends that Variation No. 2 be made without the proposed Material Alteration to Site 1, Cappagh Road, having regard to the site's peripheral location, absence of services and reliance on private car travel. As the purpose of Variation No. 2 is to resolve the unzoned status of lands affected by the s.31 Ministerial Direction of 3rd May 2023, the Executive's recommendation is that the site be zoned Agriculture (A), consistent with the Originally Proposed Variation set out at Table 1, rather than retained as unzoned land.
Recommendation	It is recommended that Variation No. 2 be made without the proposed Material Alteration to Site 1, Cappagh Road.

Reference	GLWC-C42-10
Submission By	Liam Dilleen (MKO)
Submission Summary	MKO, on behalf of the landowner Liam Dilleen, made a submission dated 16th July 2026 supporting the proposed Material Alteration to Site 9b, Roscam (southern lands, 1.145ha), which proposes to rezone the lands from Unzoned to Residential (R) and to apply a Specific Objective restricting development to a maximum of 3 units, subject to connection to water and wastewater services and subject to proper planning and sustainable development. The submission requests that, in the interest of proper planning and sustainable development, the maximum number of units permitted on the site be increased beyond 3, given the site's size, location and proximity to services, in order to provide a greater variety of house types. In support of this position, the submission encloses and relies upon a detailed planning submission prepared by MKO (dated 05.01.2025) made during the original public display of Variation No. 2 (closed 5th January 2026), when the site was proposed to be rezoned from Unzoned to Agriculture High Amenity (G). The enclosed submission requested that the zoning be changed to Residential (R) instead, and sets out the following:

Site context and services: The subject lands (c.1.145ha, described elsewhere in the submission as c.1.2ha) are located at Rosshill, Roscam, on the south-eastern edge of the Galway City plan boundary. The site is flat, bounded by hedgerow and stone walls, and is surrounded by detached dwellings accessed via driveways. It is stated to be within close proximity (generally under 2km) to a wide range of facilities and services in Roscam and Doughiska, including Merlin Woods Primary School, Merlin College, Merlin Park University Hospital, the Galway Clinic, Roscam Playground and sporting grounds, Spar Roscam, Nevin's Pharmacy, Roscam Childcare Centre, ATU Galway City Campus, Gaelscoil Dara and Formative Years Montessori.

Connectivity: The 404 and 409 bus services connect Roscam to Galway City (c.35 minutes), with the nearest stop 1.5km northwest of the site on the Old Dublin Road (R921); Oranmore train station is 3km to the west. The submission also notes a proposed Greenway Cycle Network along the coast under the Galway City Development Plan 2023-2029.

Planning history: Three previous applications for a one-off rural dwelling (PL Ref 17/295, 18/44 and 19/89) were each granted permission by Galway City Council but subsequently refused on third-party appeal by An Bord Pleanála twice on public health grounds and once for deficiencies in the Natura Impact Statement. The submission contends limited weight should be afforded to those appeal decisions, citing governance and procedural challenges affecting An Bord Pleanála at the time, and states that further ecological, hydrological and hydrogeological surveys undertaken between 2016 and 2022 (walkover surveys, a shoreline groundwater-dependent ecosystems survey, wintering/breeding bird surveys) conclude that the lands are over 225m from the Galway Bay Complex SAC and Inner Galway Bay SPA, are not of particular environmental sensitivity, contain no Annex I habitats, and are suitable for a domestic wastewater treatment system that would not adversely affect the SAC or groundwater.

Planning policy context: The submission cites the National Planning Framework (First Revision, April 2025) and a number of National Policy Objectives (including NPOs 3, 4, 7, 8, 10, 11, 12, 13, 42, 43 and 45) relating to compact growth, brownfield/infill development and housing delivery targets; the Regional Spatial and Economic Strategy for the Northern & Western Regional Assembly (2020-2032), which identifies Roscam as a strategic growth area within the Galway Metropolitan Area Strategic Plan; and the Galway City Development Plan 2023-2029 Core Strategy and Housing Strategy policies, which require sufficient zoned land, compact growth and a diverse range of housing types. Roscam is noted at section 3.5 of the Development Plan as an outer suburb that has seen the greatest recent population growth in the city.

Land use zoning history: The site is currently unzoned, following a Ministerial Direction of 3rd May 2023 (under section 31 of the Planning and Development Act 2000, as amended) which deleted a Low Density Residential (LDR) objective (Fig 11.30) that had restricted development

	on the site to two houses reserved for immediate family members of the landowner – a zoning also carried in the 2017-2023 Development Plan. The submission notes the Office of the Planning Regulator's Recommendation 5 on the draft plan required removal of isolated LDR zoning objectives, including the Roscam site, but argues this recommendation targeted the restrictive family-only LDR objective rather than residential use in principle, and that Agriculture High Amenity zoning (as then proposed under Variation 2) is therefore not the correct outcome; it submits that the established residential character and historical LDR zoning support Residential (R) zoning instead. Assessment against the Development Plan Guidelines 2022: Addressing the Settlement Capacity Audit infrastructure criteria, the submission states the site has an existing gated road access with 70m sightlines previously accepted by the Council; no footpaths currently serve the site but the Council previously confirmed no pedestrian safety concern; no dedicated cycle infrastructure exists but a future greenway is proposed nearby; there is no current foul sewer connection but this may be feasible given planned upgrades to the Merlin Park Pumping Station (approved by An Coimisiún Pleanaála, Ref 320864, July 2025); water supply would be subject to a standard connection agreement with Uisce Éireann; and any future surface water drainage would comply with Sustainable Urban Drainage System (SuDS) principles. On this basis, the submission concludes that the site meets the Guidelines criteria as a sequential, serviceable infill site. The submission requests that the subject lands be zoned Residential (R) rather than Agriculture High Amenity (G), on the basis that this would consolidate the existing pattern of development, increase housing provision and variety within the built-up area of the city, and accord with national and regional compact growth objectives; that any future development would be subject to full ecological and environmental assessment, would retain existing hedgerows and stone walls, and would respect the protected structure and national monument to the south and the protected views on the southern site boundary; and that all previous An Bord Pleanala refusal reasons have subsequently been addressed.
Response	Noted; The Chief Executive's assessment is that the proposed Material Alteration to Site 9b (rezoning from Unzoned to Residential (R), subject to a 3-unit cap) is contrary to the principles of Compact Growth under NSO 1 of the National Planning Framework, having regard to the lack of available services (including public lighting and footpaths) and the rural character of the area. The Executive's recommendation is that Variation No. 2 be made without this Material Alteration, and that Site 9b instead be zoned Agriculture and High Amenity (G), as originally proposed. On this basis, the submission's request that the permitted unit cap be increased beyond 3

	does not arise, as the site is not being recommended for residential zoning. This is also consistent with the Office of the Planning Regulator's MA Recommendation 1, which similarly recommends that the Variation be made without the proposed Material Alteration to Site 9b. The submission's observations on planning history, connectivity, ecological surveys, and consistency with national and regional compact growth and housing policy are noted.
Recommendation	It is recommended that Variation No. 2 be made without the proposed Material Alteration to Site 9b, and that the land be zoned Agriculture and High Amenity (G) as originally proposed.

Reference	GLWC-C42-11
Submission By	James McCarthy
Submission Summary	The submission objects to the proposed Material Alterations under Variation No. 2 to the Galway City Development Plan 2023-2029 that would rezone parcels 9b, 10a, 10b and 10c at Rosshill for residential development. The submitter argues that the proposed rezonings are contrary to proper and sustainable planning and are inconsistent with the recommendations of the Chief Executive and planning officials, who recommended Agricultural (A) or Agricultural and High Amenity (G) zoning for these lands. Key concerns raised include: Loss of biodiversity and natural capital: The submission describes how the sites are environmentally valuable greenfield sites that contribute to Galway City's Green Network, wildlife corridors, pollinator habitats and biodiversity. It states that their rezoning to residential would result in losses in nature and biodiversity, including knock on effects on adjacent lands. Conflict with climate and nature objectives: The submission contends that residential development would conflict with local, national and EU policies relating to climate action, biodiversity protection, nature restoration and sustainable development. Wildlife corridor fragmentation: The submission argues that residential development would reduce and fragment an important coastal wildlife corridor linking habitats around Rosshill and Galway Bay. Housing need: The submission argues that Galway City already has sufficient residentially zoned land to meet projected housing demand, as set out in reports accompanying Variation 3 to the GCDP, and therefore

	the additional residential zoning is not required to meet Galway City's housing needs. Heritage impacts: Particular concern is expressed regarding the proximity of parcels 9b, 10b and 10c to the Roscam Monastic Site, suggesting that development on these sites would negatively affect the setting, landscape character and future heritage tourism potential of the site. Traffic and sustainable transport: The area is considered unsuitable for further residential development due to limited public transport, walking and cycling infrastructure, and the potential for increased traffic congestion. Groundwater and environmental risks: The submission raises concerns regarding potential impacts of residential development on groundwater systems, local springs, karst limestone geology and in particular the nearby Galway Bay SCA and SPA. Site Specific Comments: Site 9b: The submission argues that site 9b should be rezoned to Agricultural and High Amenity (G) because it forms part of the Green Network, contains wildlife habitat and hedgerows, and could support future greenway routes. It states that rezoning to residential would negatively affect protected views and impact the setting of the Roscam Monastic Site. Site 10a: The submission argues that site 10a should be rezoned to Agricultural (A) (or ideally Agricultural and High Amenity (G)) because it contains large historical hedgerows which contribute to the biodiversity of the area, is surrounded by agriculturally zoned lands, residential development would create environmental impacts without significant public benefit, and development on the site does not represent sustainable growth. Site 10b: The submission argues that site 10b should be rezoned to Agricultural (A) because it contains significant biodiversity and hedgerows, proposed higher-density residential development would damage the wildlife corridor, and development would negatively affect the nearby monastic site and broader landscape. Site 10c: The submission argues that site 10c should be rezoned to Agricultural (A) (or potentially Agricultural and High Amenity (G)) because it forms a key part of the coastal wildlife corridor, it directly relates to the setting and archaeology of the monastic site, and development would permanently reduce biodiversity and heritage value. Site 10d: The submission supports the rezoning of Parcel 10d to Agricultural (A) but criticises the exclusion of Parcels 10a and 10b from that agricultural designation.
Response	The submission is noted.

	A number of matters referenced in the submission, such as the protection of national monuments and archaeological features, are safeguarded under existing policies in the City Development Plan and do not necessarily preclude rezoning or development on those lands. Notwithstanding the above, with regard to sites 9b, 10a, 10b and 10c, the Executive is of the opinion that, having regard to the lack of available services, including footpaths, lighting and the rural character of the area, it is recommended that the Variation is made without the proposed Material Alteration.
Recommendation	That the variation be made without the proposed material alterations to sites 9b, 10a, 10b and 10c, and that the lands be rezoned to Agriculture (A) or Agriculture High Amenity (G).

Reference	GLWC-C42-12
Submission By	Damian Lavelle, Proofridge Ltd
Submission Summary	The submission supports the proposed Material Alteration to rezone site 10b for Residential use, arguing that this is more appropriate than the previously proposed Agricultural zoning given the site's location within an established residential area. It states that the lands are serviceable, can connect to the public sewer and existing footpath network, and would support the completion of the Ros Odhrain Estate. It goes on to say that the proposed low-density housing development would incorporate green infrastructure measures to enhance biodiversity and suggests that this use could have a lower long-term environmental impact than intensive agricultural use. The submission concludes that residential zoning is consistent with the area's existing character, supports compact growth objectives, and aligns with national planning guidelines on sustainable residential development.
Response	The Chief Executive's assessment is that the proposed Material Alteration to Site 10b (rezoning from Unzoned to Residential (R), subject to a 12-unit cap) is contrary to the principles of Compact Growth under NSO 1 of the National Planning Framework, having regard to the lack of available services and the rural character of the area. When looking at lands for zoning, national policy requires local authorities to follow compact growth principles and undertake a sequential approach, with serviced or readily serviceable infill/brownfield lands within the existing built-up footprint and in more central lands brought forward as a priority. The subject land in question is a greenfield site, on the edge of an area of detached houses on the outskirts of Roscam, predominantly surrounded by agricultural land. It is located in a periphery area of the city, outside of the defined residential suburbs and outer suburbs.

	Notwithstanding the potential for connection to the public sewer network, it is considered to be poorly serviced in terms of transport by virtue of the rural nature of the roads serving the site directly, notably Rosshill Road which has no footpaths or lighting (outside of the Ros Ohdrain estate), and its remove from pedestrian and public transport networks. The rezoning of these lands as Residential land use at this point in the Development Plan cycle would represent haphazard and uncoordinated development and not constitute proper planning and sustainable development. It is noted that OPR Recommendation 1 recommends that the Variation is made without the proposed material alteration to site 10b, as they consider the lands to be peripheral, inadequately serviced and reliant on private car travel, undermining the compact, sequential and plan led growth strategy. The Executive is of the view that, in respect of the lands at site 10b, having regard to the principles of Compact Growth outlined in NSO 1, and NPO 8, 37, 43 and 103 of the NPF, it is recommended that the Variation is made without this proposed Material Alteration.
Recommendation	It is recommended that the variation be made without the proposed material alteration to site 10b and that the lands be rezoned to Agriculture (A).

Reference	GLWC-C42-13
Submission By	Office of Public Works (OPW) Heritage Services
Submission Summary	This submission is made specifically with regard to the Heritage Services portfolio. The OPW notes that Roscam Early Medieval Ecclesiastical Site (National Monument No. 46), which is in State ownership and maintained by the OPW is located in a flat, open coastal landscape with narrow surrounding roads, hedgerows, and open views, making its setting particularly sensitive to new development. With regard to site 10b, the submission requests that the height and design of an proposed units are considered and that a visual impact assessment is undertaken at application stage to protect the setting of the national monument. With regard to site 10c, the submission proposes that the new dwelling is close to the site of the existing unit to avoid encroaching on the monument visually or in relation to archaeology. Planting of native species vegetation is also recommended to provide visual screening.
Response	The observations and recommendations from OPW in respect of the National Monument and Archaeology are noted. It is acknowledged that lands proposed to be rezoned in Roscam adjoin lands which have high historic and archaeological amenity value. Such

	features are safeguarded under existing policies in the City Development Plan and do not necessarily preclude development on those lands. Notwithstanding the above, with respect to sites 10b and 10c the Executive is of the opinion that, having regard to the lack of available services, including footpaths, lighting and the rural character of the area, it is recommended that the Variation is made without this proposed Material Alteration.
Recommendation	That the variation be made without the proposed material alterations to sites 10b and 10c, and that the lands be rezoned to Agriculture (A).

Reference	GLWC-C42-14
Submission By	Údarás na Gaeltachta
Submission Summary	Údarás na Gaeltachta welcomes this proposed variation in the context of providing additional lands for residential development, while also acknowledging Variation 3 regarding the development of additional residential units. The submission provides several recommendations on the importance of safeguarding the Irish language amid the increasing population and underscoring the objective of the bilingual city drawing attention to policy objective 7.4 of the city development plan. They noted that the original CE Report for Variation 2 was prepared detailing the submission prepared by Údarás na Gaeltacht. The submission highlights that Galway holds the position of being the strongest performing Gaeltacht area for daily use of the Irish language outside of the education system therefore planning policy should protect and promote Irish within urban development. Language Plans and bilingual initiatives are supported to maintain linguistic heritage. The importance of safeguarding Irish language amid population growth is emphasised. The submission discusses how CSO data has shown that increasing populations in key areas where Irish is spoken could accelerate population growth. Údarás na Gaeltachta feels that an increasing population and no language inurement and occupancy clause in place could further dilute the use of the Irish language. The submission recommends the development of new guidelines to linguistic impact assessments for multi-unit housing in Gaeltacht areas, with a percentage of units being reserved for Irish speakers. Applications for multi-unit developments they believe must include a Linguistic Impact Statement. This is to enhance the Irish language use within new residential developments. The submission wishes for language planning area boundaries be considered in this material alteration and in future planning decisions. They finally reiterate the fundamental value of the Irish language to the city's heritage and culture and should the metropolitan area of the city

	grow further it is important that the linguistic character of the Irish language is protected.
Response	Noted. Údarás na Gaeltachta have highlighted the importance of safeguarding the Irish language, and this is supported by the Galway City Council as per 7.4 of the Galway City Development plan on the Bilingual city where it aims to protect and promote the use of the Irish language.
Recommendation	It is recommended that Variation No.2 be made without the proposed Material Alterations, as referenced in Table 1 above.

Reference	GLWC-C42-15
Submission By	Transport Infrastructure Ireland (TII)
Submission Summary	TII acknowledge that the proposed material alterations to Variation No.2 and note advise that they have no further observation on this, since their last submission on Variation No.2. They request that this observation is taken into consideration prior to the adoption of Variation No.2.
Response	Noted
Recommendation	It is recommended that Variation No.2 be made without the proposed Material Alterations, as referenced in Table 1 above.

Reference	GLWC-C42-16
Submission By	Office of the Planning Regulator (OPR)
Submission Summary	The OPR welcomes the approach taken in the proposed Variation to assign zoning objectives to lands that were left unzoned following the Ministerial Direction of May 2023. However, it objects to several of the proposed Material Alterations, particularly those seeking to introduce residential zoning on lands at Cappagh Road (Site 1) and Roscam (Sites 9b, 10a, 10b and 10c). The OPR considers these lands to be peripheral in location, inadequately serviced, lacking wastewater infrastructure, footpaths, public lighting and convenient access to active travel and public transport networks. It states that residential zoning at these locations would result in car-dependent development and would undermine the compact, sequential and plan-led growth strategy set out in the National Planning Framework (NPF), the Regional Spatial and Economic Strategy (RSES) and Variation No. 3 of the Galway City Development Plan. As outlined in the 3 no. recommendations set out in the report, the OPR recommends that the proposed Variation be made without the following Material Alterations:

	• Site 1 (Cappagh Road) – rezoning from Agriculture (A) to Residential (R). • Site 9b (Roscam) – rezoning from Agriculture High Amenity (G) to Residential (R). • Sites 10a and 10b (Roscam) – rezoning from Agriculture (A) to Residential (R). • Site 10c (Roscam) – rezoning from Agriculture (A) to Residential (R2). • Associated specific objectives for Sites 9b, 10a and 10b. The OPR also raises concerns regarding the proposed rezoning of lands at Coolagh Road (Site 3) and Roscam 9a from Agriculture High Amenity (G) to Agriculture (A), noting that insufficient planning justification has been provided to demonstrate consistency with the landscape and amenity strategy of the Development Plan. It recommends that these zoning amendments be reviewed and omitted unless a robust planning rationale can be demonstrated. Finally, the OPR identifies a flood risk management issue relating to an unmapped watercourse in the vicinity of Site 1 (Cappagh Road). It recommends that appropriate flood risk assessments be undertaken to determine whether a Stage 3 Flood Risk Assessment is required and that any residential zoning should only proceed where it can be demonstrated to comply with the Flood Risk Management Guidelines.
Response	The OPR's submission broadly aligns with the Chief Executive's assessment set out in Table 1 of this report in relation to Sites 1, 9b, 10a, 10b and 10c. The Chief Executive has similarly concluded that these proposed residential rezonings are not supported, having regard to the principles of compact growth under the National Planning Framework, the peripheral location of the sites, the absence of key infrastructure and services and the lack of sustainable transport provision. The Executive's recommendation is that Variation No. 2 be made without these Material Alterations. <u>Site No. 3 - Coolagh Road</u> In relation to Site No. 3, the proposed zoning amendments at Coolagh Road (Site 3) involve changing the zoning objective from Agriculture High Amenity (G), to Agriculture (A) as part of the Material Alterations process. The (A) zoning objective seeks to protect and support agricultural land uses and rural character while restricting inappropriate urban development. The proposed rezoning does not facilitate additional development potential and therefore represents a more restrictive land-use designation than residential or other development-oriented zonings. It is also worth noting, following an on-site inspection and having regard to the topography of the site, that the development of an appropriately designed single storey / split level dwelling on this site, would not

	compromise the linear protected view along this road nor would it impact negatively on visual amenity in the area, particularly as there are a number of existing single storey dwellings to the north. In addition, any development on site would be subject to all the usual planning policy and siting considerations. On the basis of the forgoing, it is considered that the addition of a non-material amendment, to clarify that any development on site takes into account the topography and protected view along Coolagh Road, would ensure the proposed amendment is consistent with the overall strategy of the Development Plan to protect undeveloped lands and manage urban expansion in a plan-led manner. <u>Site No. 9a - Roscam</u> In relation to Site No. 9a, the proposed zoning amendments at Roscam involve changing the zoning objective from Agriculture High Amenity (G), to Agriculture (A) as part of the Material Alterations process. As noted above, the (A) zoning objective seeks to protect and support agricultural land uses and rural character while restricting inappropriate urban development. It is pointed out that any proposals on the site in question would be subject to assessment with regard to siting and design, as well as all relevant planning policy considerations. It is noted that the Site No. 9a, like other sites in the local area, require infrastructure / services such as water and wastewater services. It is acknowledged that an extension of the existing service network in the local area could be facilitated, particularly a large residential development is under construction to the north of the site. No further comment or objection. <u>Flood Risk</u> The OPR's comments regarding flood risk at Site 1 are also noted and this is also addressed under the OPW submission above. In summary, the site in question and potential sources of fluvial flooding were examined as part of the SFRA, undertaken alongside the Proposed Variation. It was determined that the site is situated within Flood Zone C – therefore Stage 3 SFRA was not required.
Recommendation	It is recommended that Variation 2 be made without the proposed material alterations to sites no.1, 9b, 10a, 10b and 10c. <u>Site No. 3 - Coolagh Road</u> It is recommended that the material alteration to Site No. 3 - Coolagh Road i.e. changing the zoning objective from Agriculture High Amenity (G) to Agriculture (A) should proceed, subject to the following non material amendment / clarification <i>"Any proposed development on site shall be suitably designed to take account of the topography of the site and to have regard to Protected</i>

	<i>View No. 2 listed in Table 5.9 of the Galway City Development Plan 2023 – 2029"</i>
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Reference	GLWC-C42-17
Submission By	Department of Housing, Local Government and Heritage (DHLGH)
Submission Summary	DHLGH notes that site 10c adjoins a complex of Recorded Monuments which are considered to be of national importance and designated as a National Monument. It highlights that part of the site's southern boundary forms part of the archaeological complex itself and adjoins State-owned lands. The submission states that no archaeological impact assessment was carried out in advance of the rezoning proposal and argues that the SEA does not adequately assess the archaeological implications. It raises concerns that residential development could negatively affect the setting, amenity and potentially undiscovered archaeological remains associated with the National Monument, as well as impact a protected panoramic view at Roscam. The Department concludes that the proposed rezoning conflicts with national archaeological policy and the Galway City Development Plan and therefore recommends that Material Alteration 10c be omitted.
Response	The observations and recommendations from DHLGH in respect of the National Monument and Archaeology are noted. It is acknowledged that lands proposed to be rezoned in Roscam adjoin lands which have high historic and archaeological amenity value. Such features are safeguarded under existing policies in the City Development Plan and do not necessarily preclude development on those lands. The SEA has been undertaken on the Proposed Variation in compliance with the SEA Directive and transposing Regulations. The SEA Environmental Report details the findings of the assessment, including with respect to cultural heritage (including archaeological heritage). The report identifies under Section 8.6 "Assessment Against SEA Framework" that: "Taking into account the above, including compact growth requirements, this proposal would not provide the most evidence-based framework for development and have the potential to undermine sustainable development and proper planning - with potential for associated unnecessary significant adverse environmental effects on various environmental components, including: ... • Cultural heritage, including unknown archaeology...." Some of the detailed information on archaeological heritage provided by the Department can be integrated into the final version of the SEA

	Environmental Report that accompanies the Variation, if made with this Proposed Material Alteration. Notwithstanding the above, with respect to site 10c the Executive is of the opinion that, having regard to the lack of available services, including footpaths, lighting and the rural character of the area, it is recommended that the Variation is made without this proposed Material Alteration.
Recommendation	That the variation be made without the proposed material alteration to site 10c and that the lands be rezoned to Agriculture (A).

Appendix 1

Final, Consolidated AA Report and associated Final AA Determination