



MÓR Action

Working to make Maree and Oranmore a more pleasant place to live.



moraction.blogspot.com

@MOR_Action

Introduction

MÓR Action is a group of residents who want to improve the Maree-Oranmore area for everyone, young and old, abled and disabled. We believe the heart of villages and towns are its people, not the number of cars passing through. We want our community to be a place.

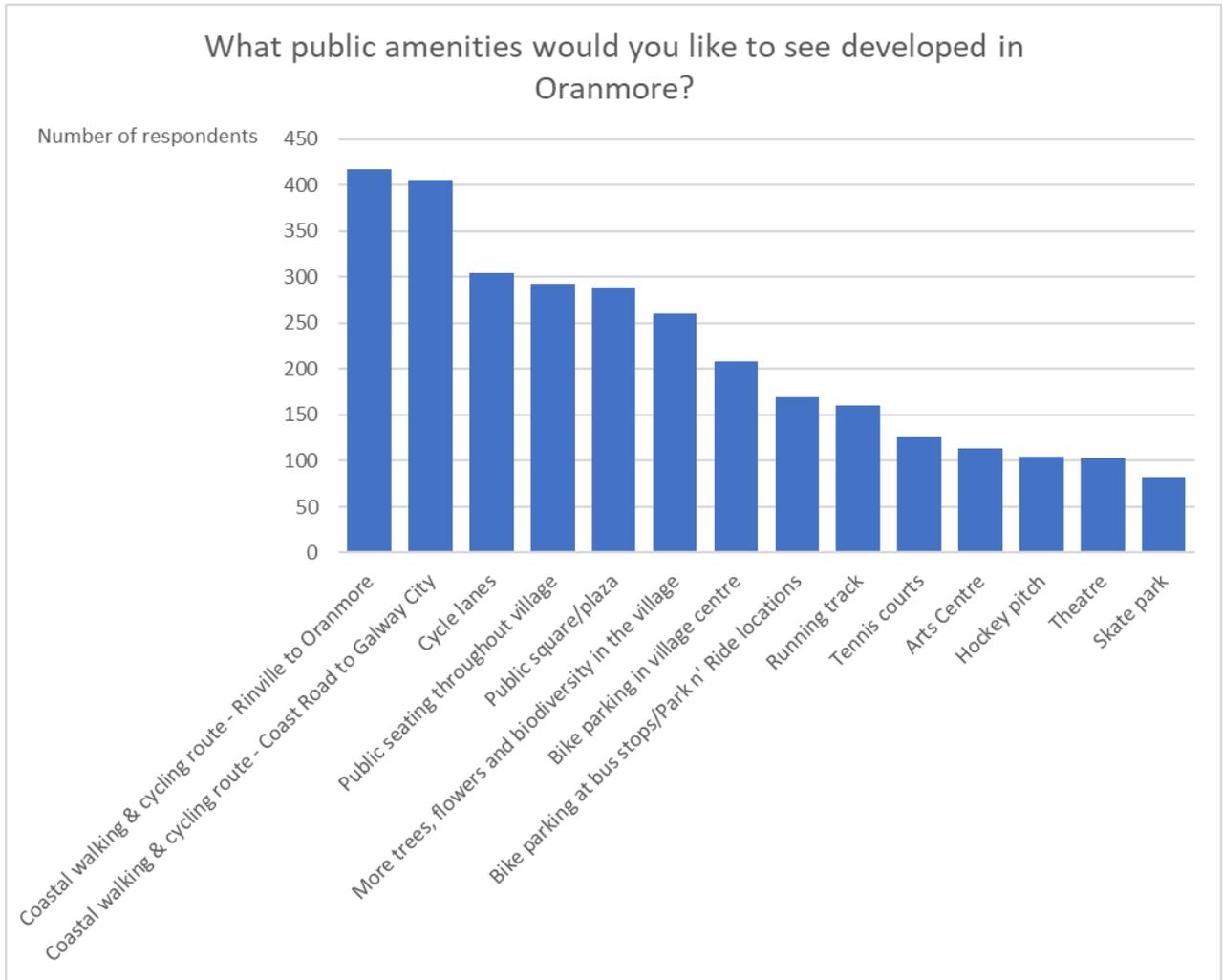
There is a climate emergency and biodiversity crisis (happening now, not in the future). We will soon be in the recovery phase of the global COVID-19 pandemic. In our view, at the community scale, the plan does not address how we respond to these big issues or show our contribution to managing them.

Our submission reflects our priorities and interests which include:

- Culture and community; cultural centres, activities for all, sports clubs and markets.
- Sustainable mobility; safe routes to school, connected infrastructure, cycle and walking infrastructure, safe streets and low traffic speeds, 15-minute cities.
- Town centre public realm; spaces for people not cars, welcoming, clean and safe.
- Rinville park as a special area for recreation.
- Biodiversity, climate change and community resilience.

We have conducted an online survey to gather the thoughts and opinions of what the local community want for Oranmore. The number of responses (517) give a representative sample of the local population with some overwhelming desires, none of which are unrealistic. The anonymous results of the survey will be shared with the Galway County Council. Some of the headlines from the survey are as follows and should be incorporated into the County Development Plan:

- 78% of respondents are in favour of a 30kmh speed limit for Oranmore. Only a small minority (7%) are against. This should happen.⁵¹
- The main reasons people avoid shopping and socialising in Oranmore are traffic jams (51%), footpaths too narrow (34%), lack of car parking (32%), lack of safe cycle infrastructure (28%), lack of public seating (23%) and lack of public toilets (22%).
- On the question “What public amenities would you like to see developed in Oranmore?”, the most popular responses are in the chart below.



- Of the 381 respondents who live within 3km of the Oranmore centre 153 take children to school or creche by car, compared to 96 on foot, and 15 who cycle.
- The respondents are clear in what would encourage them to cycle or walk to Oranmore centre. Segregated cycle lanes should be sought to encourage greater cycling. To encourage walking a mix of measures are required. **With 51% of respondents willing to cycle with segregated cycle paths, there is a significant opportunity to take a huge volume of cars off the streets during every school and commuting rush hour.**



Our submission on the county development plan comes in two parts. Part 1 is what we believe is missing from the draft development plan with specific reference to Oranmore, Maree and Garraun.

Part 2 contains detailed submissions and observations with specific references to volumes, sections and policy objectives in the plan documents.

We have undertaken a review of the progress on policy objectives in the Galway County Development Plan 2015 – 2021 and Oranmore Local Area Plan (LAP) 2012-2022. There has been no visible progress on a significant number of the policy objectives in these plans and so we have low confidence in the ability to deliver the draft plan. Other reasons include:

- Many of the specific objectives are carried over from the previous plan. There has not been any progress on a significant number of these. There is nothing to indicate this will change.
- In 2021 we facilitated a petition, which received over 1,400,400 signatures and support from many businesses for a trial one-way system in Oranmore. This was a missed opportunity to gather information and evidence on what traffic and mobility improvements may be appropriate for Oranmore. The trial could have completed during the lower traffic volumes during lockdowns in early 2021 to test out different approaches to the public realm.
- There is a lack of evidence to inform the current baseline conditions and how these will change during and after the plan timescales, and as the plan is implemented.
- The policy objectives are not sufficiently specific and there are few details on delivery mechanisms to ensure the plan vision and objectives can be delivered both within and outside of individual planning application site red-line boundaries.
- There is no enforcement of existing traffic and parking regulations in Oranmore. This would take minimal effort compared to enforcement of the development plan policy objectives.

Part 1: What is missing from the draft county development plan

We start with a list of examples of gaps in the evidence base. These, include:

- no traffic monitoring or modelling at the local settlement scale to determine the traffic impacts of land use zoning plans (during the school run we already have over 1,000 students trying to get to schools every morning and afternoon),
- no consideration of the EU best practice for default 30kmh speed limits in built up areas,
- the omission of climate change flood risks from the strategic flood risk assessment to prevent future flood risk and determine whether the plan is deliverable,
- there is no flood emergency response plan to manage what happens when the coast road, access to the railway station, the Maree Road at the Oranhill junction (see planning refence [21408](#) which suggests the council is fully aware of these issues) and parts of Maree flood during morning or evening rush hour.
- Climate change is not properly considered. The latest coastal extreme sea level analysis (ICWWS 2018 study) data shows that the Medium Range Future Scenario (MRFS) 50% Annual Exceedance Probability (AEP) flood (the 1 in 2 flood) has an equivalent flood level to

the present day 0.5% AEP (1 in 200 flood) extent used in the Strategic Flood Risk Assessment (SFRA) for this county development plan land use zoning decisions. The latest MRFS 10% AEP (1 in 10 flood) level is equivalent to the 0.1% AEP (1 in 1000 flood) level used in the SFRA. The MRFS is likely to be the conditions in 2070 to 2100. It is also worth noting that the Catchment Flood Risk Assessment and Management (CFRAM) data used to inform the SFRA do not include for any wave overtopping. The CFRAM study scope was only to map the flood hazard and risk from storm surge and astronomical tide only. We all know from experience of coastal floods on the Coast Road since 2013 that wave overtopping plays a part.

- the lack of detail on whether European-designated Natura 2000 sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)) and habitats are at favourable conservation status to assess whether the plan or mitigation measures will not have any Likely Significant Effects (in the absence of such data Ireland's Reporting under Article 17 of the Habitats Directive should be used to inform the conservation status),
- the lack of mapping of green infrastructure and ecological corridors to form the baseline for understanding where the ecological corridors to be protected are located, (for example see planning refence [21408](#), SHD -TA07.304203)
- the lack of any clear strategy or targets for cultural and arts facilities which cannot be delivered at scale by the multiple self-funded and charitable organisations,
- the lack of reasoned evidence as to why some material alterations have been approved by elected members despite the Strategic Environmental Assessment (SEA) specifically concluding, for a number of reasons, that these are not in the interests of sustainable development,
- the lack of mitigation measures for significant adverse effects identified in the SEA Environmental Report.

The Metropolitan Area Strategic Plan includes land use zoning and policy objectives for Oranmore and also the new town of Garraun. These start with a bigger scale vision but quickly become isolated plans without clear connection between settlements. The geographic divisions mean that impacts are not properly considered, and opportunities are missed.

Garraun is directly adjacent to Oranmore and therefore we believe should be considered together with Oranmore. It is inconceivable that one cannot have an effect on the other with many shared facilities, infrastructure and amenities. We believe they must be considered together in terms of the impact on local traffic, facilities and other infrastructure. One of the key objectives within 'Small Growth Towns' section 4.4 Land use Zones is to consolidate town centres. Having one town centre in Oranmore and one at Garraun less than 2km apart surely is going against proper planning?

To develop and consolidate the existing town centre to improve its vibrancy and vitality with the densification of appropriate commercial and residential developments ensuring a mix of commercial, recreation and civic uses.

Maree and Rinville are intrinsically joined to Oranmore, not just through the road network but throughout the community. Sports clubs, schools, social groups all associate with both communities. Rinville Park is a key asset to Oranmore, Maree and the wider area including Galway City. In fact,

given that Rinville Park is part owned by Galway City it seems absurd that these areas are not considered together.

In 2021 we spoke at the Gort/Loughrea Municipal District Council meeting to present a vision for Rinville Park to be considered as a Special Area for Recreation (SAR). This includes park expansion and multiple social, cultural, recreational and environmental uses. This should be included in the development plan. The last tracts of land on the north of the park are now for sale and would allow access to the sea on both sides of the peninsula. If they are not included the contiguous expansion of the park will not be possible at any stage in the future.

Our children regularly breathe in polluted air on the way to school past kilometres of cars sitting idling in traffic. We recognise it is not possible for everyone to walk or cycle to school, but action is needed here to establish safe and segregated cycle routes. When the streets are not congested, traffic speeds are too high. There is no reason not to set uniform default 30kmh speed limits. It saves lives at negligible cost.

There is absolutely nothing for the significant number of teenagers to do in Oranmore outside of organised sport. They have no space for them to safely meet. No facilities outside of playing pitches have been provided. All playing pitches provide are located in the village centre which is extremely difficult to access for young children without supervision as the footpaths are dangerous, a lack of safe crossings points and no safe cycling infrastructure to use. Skate park, hockey pitches, basketball courts, tennis courts should be incorporate into any future facilities. Oranhill has for years and continues to suffer from no facilities with teenagers and children having to walk kilometres to the village centre to access playground and pitches and all with no safe crossing points or cycling lanes.

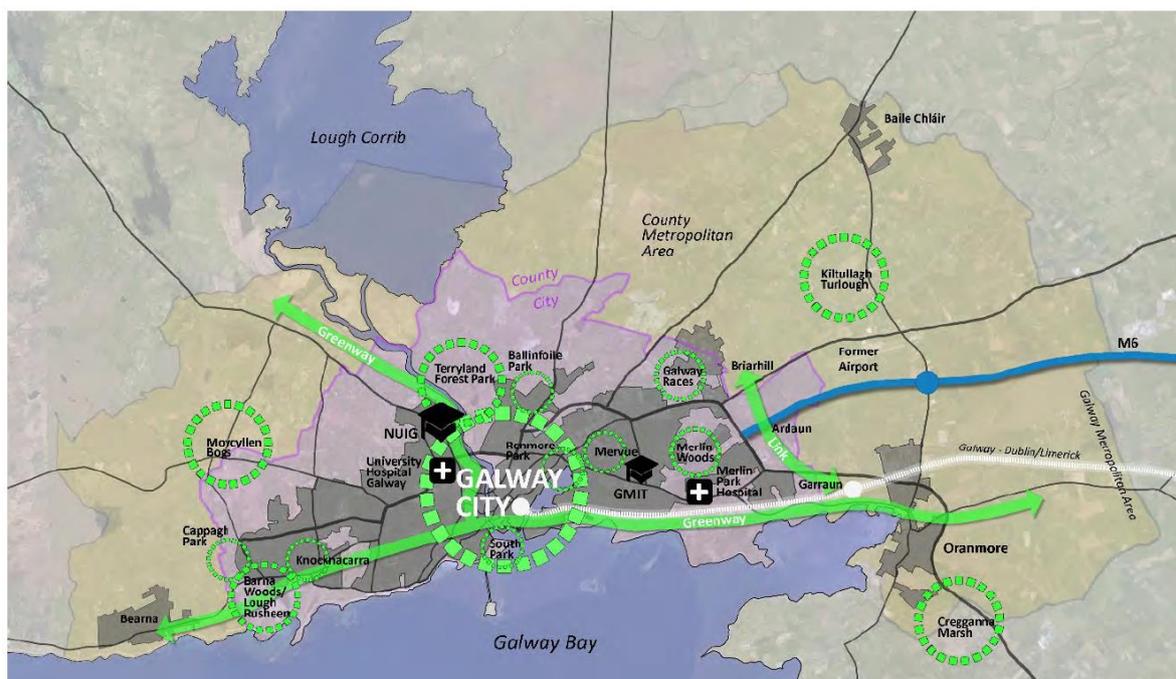
Oranmore itself is split into two different municipal and electoral districts. This means there is a democratic deficiency for the Oranmore and Maree community as a whole. It is absurd that one councillor can take an interest in part of the town and potentially not take the views of the other half. This results in a lack of joined up thinking and raises concerns that the draft county development plan for Oranmore may be based on a democratic vacuum. An example of this is the incomplete footpath on the Old Limerick Road which does not continue across the municipal council boundary while we acknowledge funding has now been secured to complete this path if won't occur for years after the first section was completed. This highlights the need for paths, cycleways and active travel solutions to also be mapped out for the duration of the plan and not just single standalone projects.

Within the MASP for Oranmore a Transportation Plan must be at its core. In our opinion you cannot continue to promote development without considering how transport and transportation infrastructure works within Oranmore and this should be based on evidence gathered within a Transportation Plan. For example, with 3 primary schools within Oranmore Village centre no new primary school will be built within the Garraun MASP according to department of Education guidelines due to proximity. So how does the plan deal with this? Without joint up infrastructure hundreds of car dependent parents will travel from Garraun MASP to Oranmore village twice daily adding to the already gridlock town of Oranmore. You will experience the same issue for sporting activities, social gatherings etc. It is our opinion that a transport infrastructure plan needs to be

delivered within the MASP plan of Oranmore and Garraun and Oranmore & Garraun need to be considered as one plan due to proximity unlike other MASP within County Galway.

Many of the ecological and greenway corridors the draft plan references cross settlement and Metropolitan Area Strategic Plan (MASP) boundaries. There appears to be a missing feedback loop to join these together from the individual settlement boundary plans back up the MASP and county development plan.

This lack of connectivity is best described with reference to figure 2 from the MASP document which shows the green network (see below). We recognise this is a strategic plan, but there are some substantial “green” features and connections that should be considered.



The definition of green is not clearly defined in this context and so we assume that the plan is referring to a Green Infrastructure Network, which should be multifunctional space. In the context of the MASP we believe the green infrastructure network should be formed of:

- Natura 2000 sites, national and local biodiversity designations
- Watercourses and floodplains
- Cultural heritage
- Places to see, with other places to see
- Connections from further afield, and
- to link homes to:
 - Schools
 - Sports facilities
 - Recreation amenities
 - Town centres
- Additional stations along the Athenry to Galway city route to service more local populations.

When it comes to the setting and enforcement of development management standards, we feel that for proper strategic planning it is too late to plan at the planning application stage for infrastructure and amenities, within and outside of planning application red line boundaries. Strategic Housing Development applications are not delivering either. We feel that the county development plan should set evidence-based requirements for specific zoned parcels of land. This should include details of who pays for what and when, including a mechanism for future developers, and those sitting on vacant and derelict property to contribute for essential infrastructure and amenities to be provided. This would ensure joined up thinking, efficient delivery and allow for full public consultation and engagement. The development contributions could be ring fenced in a fund with full accountability and transparency. This is essential, because the MASP volume of the County Development Plan does not join the interconnection between different parcels of land with the same land use zoning. It is possible that either all developments will include a small number of amenities without considering the cumulative deficit and future need of the whole community.

The material amendment to extend the settlement boundary for Oranmore to the south contradicts the Strategic Environmental Assessment (SEA) Environmental Report for a significant number of reasons, as quoted below. It is worth noting no mitigation measures have been proposed for these significant adverse effects.

The benefits of zoning this land to the local and wider community have not been detailed in the plan and therefore there are no reasonable grounds presented for this land to be zoned residential (phase 2). The reasoning in the SEA assessment is of interest to all of the community in Oranmore because it is all about driving the town centre, derelict buildings and more compact development with specific reference to sustainable mobility and protection of multiple environmental components.

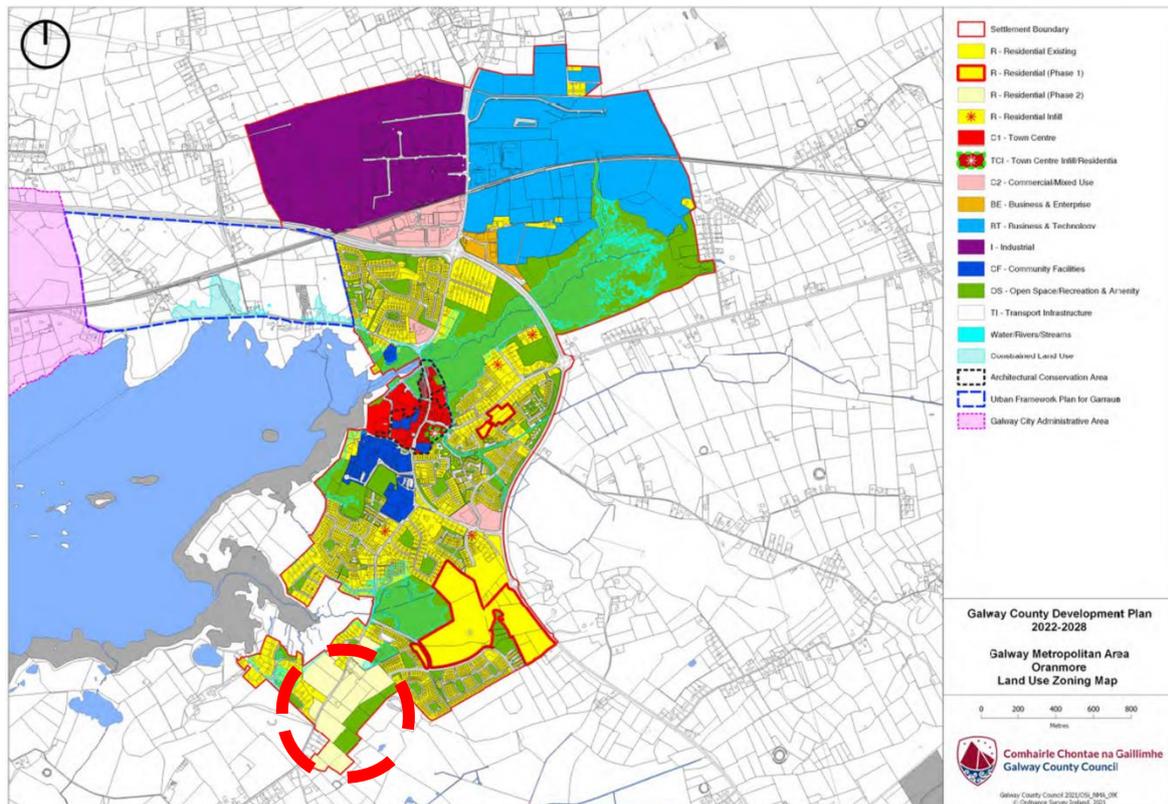


Figure 1. Location of the extension to the settlement boundary in the land use zoning map (shown in red)

“the additional zoning would present additional, unnecessary and potentially significant adverse effects on various environmental components, including:

- *Ecology and ecological connectivity;*
- *Increased loadings on water bodies;*
- *Conflicts with efforts to maximise sustainable*
- *Compact growth and sustainable mobility;*
- *Adverse impacts upon carbon emission reduction targets in line with local, national and European environmental objectives;*
- *Adverse impacts upon the economic viability of providing for public assets and infrastructure;*
- *Occurrence of adverse visual impacts;*
- *Cultural heritage; and*
- *Potential effects on human health as a result of potential interactions with environmental vectors”*

On the contrary, it is unreasonable for landowners to have zoned land that has negligible chance of being developed. This is because of the lack of mitigation or monitoring measures for the significant adverse effects identified.

Should this land be zoned as residential (phase 1 or 2) then it must be of an exceptional quality and ensure there are no impacts on the environmental components listed above from the SEA Environmental Report. It is not clear how this zoning achieves the core strategy vision and objective for compact growth because there are no obvious access points that allow for the zoned land to be within 15 minutes walk of the services and education facilities in Oranmore. Unmitigated, it would be certain to result in an unacceptable increase in traffic either through Oranhill or on the Maree road, and Road, increase car dependency.

Just like Garraun, this is an example of why we believe the draft county development plan lacks the joined-up strategic thinking necessary to address the recovery from the COVID 19 pandemic, the climate emergency and biodiversity crisis. The plan does not allow Oranmore, Maree and the new district of Garraun to prosper in a meaningful manner. We cannot accept or allow *ad-hoc* housing development to proceed in isolation without the delivery of properly designed places, infrastructure, amenities and services.

In summary we wish the following submissions to be considered:

- The settlement boundaries for Oranmore and Garraun should be merged and considered as a whole.
- A full evidence based Transport Plan needs to be delivered as part of the Oranmore & Garraun MASPs
- The evidence baseline is built to ensure delivery of the plan meets the vision and objectives stated.
- We believe that land use zoning of ecological and green corridors outside of the settlement boundaries is essential.
- Flood zones should be based on the latest data available and use future flood probability under climate change scenarios, not present day probability.
- Delivery mechanisms are clearly identified and actioned for policy objectives that need intervention outside of individual site red-line boundaries, or require 3rd parties.
- We feel that the MASP boundary should be extended to include Maree and Renville, as these are core parts of the community.
- Land use zoning requirements should be set and be specific to the zoned land parcel and include objectives that deliver infrastructure and amenities for cumulative existing and future development.
- Safe routes to school are fundamental for the whole village and any proposed MSAP in Garraun.
- Safe segregated cycle and walking routes within Oranmore and also to Renville and Galway City on the coast road are an essential element in delivering on the social, environmental and transport needs for the area, in reducing traffic congestion, and in promoting inclusion in the community for those who cannot, or who chose not to, drive. Delivery of this infrastructure is a priority under the National Transport Strategy and should similarly be prioritised in the County Development Plan.
- All streets within towns and villages should have 30kmh speed limits. European research has shown this saves lives.
- Public realm improvements to Oranmore are required to make it more desirable and easy to visit Oranmore centre.
- It is contrary to sustainable development for the plan to have no mitigation for significant adverse effects that have been identified.

Part 2: Submissions on the draft county development plan

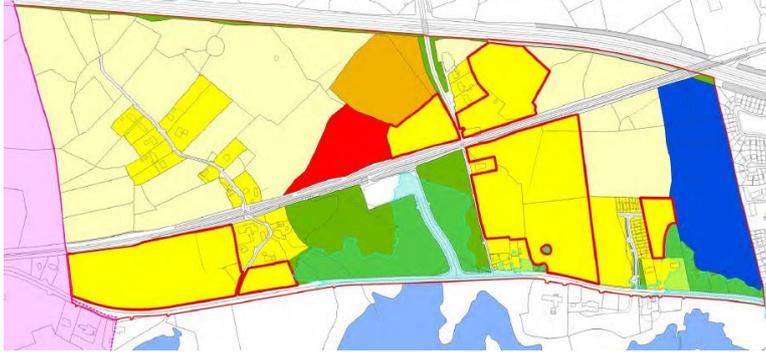
All Volumes

Paragraph	Policy Objective	Submission
General on governance and democratic representation		<p>The electoral and council municipal boundaries run through the centre of Oranmore and result in a democratic deficit in terms of elected members who specifically represent the whole of Oranmore and Maree as a combined community. This runs completely counter to how most of the local sports clubs operate.</p> <p>The electoral and municipal boundaries must be redrawn so that they make sense. There are housing estates in Oranmore split in half - some in Gort-Kinvara, other residents in Oranmore-Athenry. They should be redrawn in line with actual development and the community.</p>
All Paragraphs	All Objectives and Policies	<p>The ability to deliver the plan objectives is critical and based on previous track record we have doubts on how the policy objectives in the plan will be realised.</p> <p>There is no information available to the public on the actions taken by the county council during the lifetime of the Oranmore LAP (2012-2022) to support, encourage or facilitate objectives to be delivered outside of individual development red line boundaries.</p> <p>As such, it is difficult for the local community have any confidence that the planning policies and objectives proposed in the draft County Development Plan and Metropolitan Area Strategic Plan (2022 - 2028) will be achieved within the lifetime of the plan, both within and outside of planning application red line boundaries.</p> <p>We specifically refer to the following objectives listed below and request that the monitoring reports are made publicly available, and delivery and implementation plans are part of the development plan for these objectives:</p> <ul style="list-style-type: none"> Objective RD 11 – Neighbourhood Centre at Oranhill Objective SI 2 – Universal Access Objective CF 7 – Amenity Network Objective CF 8 – Provision of Recreation and Amenity Facilities in Oranhill Objective CF 9 – Riverside Networks Objective CF 10 – Coastal Park Objective CF 11 – Coastal Walkway/Cycleway Objective CF 12 – Social/Cultural/Youth Centre & Facilities Objective TI 2 – Sustainable Transportation Objective TI 4 – Walking Objective TI 5 – Cycling Objective TI 6 – Bicycle Parking Objective TI 7 – Walking & Cycling Strategy Objective TI 14 – Linkages for Pedestrians & Cyclists at Páirc an Clochar Objective TI 17 – Urban Street Network Objective TI 23 – Schools Objective UI 15 – Water Bodies and Watercourses Objective UD 2 – Public Spaces and Streets Objective UD 4 – Green Network and Landscaping Objective NH 5 – Biodiversity & Ecological Network Objective NH 8 – Frenchfort Stream Ecological Corridor Objective NH 9 – Trees and Hedgerows Objective NH 11 – Summer Botanical Survey for Lands at Moneyduff Objective NH 12 – Control of Invasive and Alien Species

Volume 1. Chapter 2 – Core Strategy, Settlement Strategy and Housing Strategy. (with references to Volume 2 Metropolitan Area Strategic Plan, Appendix 9 Environmental Reports)

Volume & chapter	Paragraph	Policy Objective	Submission
<p>Volume 1 Chapter 2 Core Strategy, Settlement Strategy and Housing Strategy</p>	<p>2.3.1 Project Ireland 2040: National Planning Framework (NPF) 3.7.1 Infill Sites</p>	<p>CS 2 Compact Growth CGR 11 Strategic Sites UL 1 Infill Sites DM Standard 2: Multiple Housing Schemes (Urban Areas) DM Standard 32: Parking Standards</p>	<p>Infill sites are referenced multiple times throughout the plan documents as a means of achieving the strategy for compact growth. There is no specific definition as to what classifies as an infill site and then what, if any, additional controls or amendments to other development management standards may apply.</p> <p>This is critical as infill sites appear to be critical to achieve compact growth for Baile Chláir, Bearnna and Oranmore. If infill sites are not managed appropriately we will either have a deficit of amenities and recreational space within walking distance of the more densely populated area, or an infill sites will be harder to develop resulting in greater suburban sprawl and more reliance on car travel.</p> <p>The development plan policy objectives need to explicitly state what requirements apply for amenities, sports facilities etc, in conjunction with this. If there is a 30% increase in existing footprint of the area, then there must be a proportionate development of recreational amenities - sports pitches, parks, recreational routes for walking/cycling, public realm space etc? What additional funding will accrue to the area and how will this be ringfenced so that it is used for delivery of these amenities/facilities?</p>
<p>Volume 1 Chapter 2 Core Strategy, Settlement Strategy and Housing Strategy</p>	<p>2.3.5 Regional Spatial and Economic Strategy (RSES)</p>	<p>CS 1 Implementation</p>	<p>Galway is identified as the fastest growing city in Ireland over the past 50 years. The National Planning Framework provides a target growth rate for Galway of between 50%-55% to 2040. The RSES has targeted the Metropolitan Area of Galway to grow by 27,500 to 2026 and by a further 14,500 to 2031 with a population of the city and suburbs accommodating 23,000 to 2026 and a further 12,000 to 2031. As the settlements of Baile Chláir, Bearnna and Oranmore are in the county environs there is a population allocation to this part of the county of 4,500 by 2026.</p> <p>With the substantial increase to Oranmore population over next 5 years:</p> <ul style="list-style-type: none"> • What is the corresponding amount of funding being allocated for amenities and infrastructure? • What is the source of funding and delivery mechanism for such amenities and infrastructure outside of individual planning application red line boundaries? <p>We believe the plan should present specific figures to be allocated by the Council in terms of economic funding for Oranmore to support this growth.</p> <p>We believe the plan should include specific plans for rail, light rail, bus and cycle infrastructure to support this population growth and address congestion. To ensure the vision for the strategy is deliverable it is critical that there are commitments from 3rd parties who will be responsible for delivering infrastructure and services.</p>

			<p>We believe it is necessary for the plan to identify how amenities and infrastructure will be delivered for estates and roads not taken in charge. Will funding mechanisms be put in place to enable such enhancements and ongoing maintenance?</p> <p>We also believe that the development charges placed by the County Council in the Maree-Oranmore area should be ring fenced and used within the parish and this should be highlighted to the local community.</p>
<p>Volume 1 Chapter 2 Core Strategy, Settlement Strategy and Housing Strategy</p> <p>Volume 2. Metropolitan Area Strategic Plan</p>	<p>2.4.3 Settlement Hierarchy</p>	<p>SS1 MASP (Level 1)</p> <p>Various objectives in Volume 2 MASP</p>	<p>The MASP has been identified to accommodate critical mass in population growth within the area that will ensure the vitality and appeal of Galway City and the surrounding towns and villages: Baile Chláir, Bearna, Oranmore, Garraun and Briarhill</p> <p>Oranmore is within the top tier of the settlement hierarchy. This means large scale development and high density. We believe this must be supported by high quality, high volume, mass transport - rail, light rail, cycle infrastructure required to avoid mass car congestion.</p>
<p>Volume 1 Chapter 2 Core Strategy, Settlement Strategy and Housing Strategy</p> <p>Volume 2. Metropolitan Area Strategic Plan</p> <p>Appendix 9 Environmental Reports - Strategic Flood Risk Assessment</p>	<p>2.4.4 Future Settlement Growth</p>	<p>SS1 MASP (Level 1)</p> <p>Various objectives in Volume 2 MASP</p>	<p>We note the strategic objective of the plan to support the designation of the MASP and the settlements of Baile Chláir, Bearna and Oranmore; and to support the concept of the Urban Framework Plans for Briarhill and Garraun;</p> <p>The Settlement Hierarchy seeks to strengthen the urban fabric of the county, with an emphasis on building critical mass in the MASP, Key Towns, Strategic Potential Town, the Self-Sustaining Growth Towns and Self-Sustaining Towns. The focus is on achieving the consolidated growth of the settlements, with a significantly high proportion of housing in the existing built-up footprints of each settlement, strengthening town centres to their full potential by utilising under-utilised land and buildings and developing the settlements in a sequential manner. Two Urban Framework Plans have been prepared for Briarhill and Garraun and are contained in Volume 2 of the plan. The UFP for Garraun is centred around the train station at Oranmore. The Briarhill UFP is integral to the IDA/Employment sites at Parkmore and will be connected to an existing public transport corridor.</p> <p>It is not clear from any of the draft documents what this higher density means in practical terms and what criteria the council will use to guide developers and make decisions on applications for high density development. This needs to be clarified. The visual impact of high-density development in Garraun or the centre of Oranmore has not been addressed in the SEA Environmental Report.</p> <p>It is apparent that Briarhill and Garraun are key components to achieving the MASP objectives. To be able to offer any reasonable comments on this plan and zoning objectives the public needs to be able to view and comment on the full details of the Urban Framework Plans for Briarhill and Garraun at the same time as the County Development Plan.</p>

			<p>If the Garraun plan is centred around the train station, where is the supporting infrastructure to provide safe walking and cycling links between Garraun and Oranmore?</p> <p>The Strategic Flood Risk Assessment (SFRA) does not use the latest coastal flood risk projections from the ICWWS 2018 study to define flood zones for present day or coastal flood risk. The Garraun zoning map has not been subject to a level 2 SFRA to consider flood risk to the proposed zoning, resilience and adaptation to climate change. This is a critical omission as the draft development plan has not been subject to the justification test based on the best available information and so does not follow the Guidelines for Local Authorities for planning and flood risk. This is important because it is unacceptable to expose people and future property to flood hazard along the coast road. Specific points not addressed, to ensure the proposed development plan is sustainable, include continued resilience of communities, infrastructure, transport networks (including safe access and egress) and property to flood risk.</p> <p>There is no assessment of the traffic impacts of the proposed development, the viability of the new traffic access onto the existing dual carriageway or the vague proposal to reduce through traffic on the coast road. It is impossible to make any useful submission or review of the proposals without this evidence.</p> <p>The proposed wildlife park appears to be no more than drawing a line on the map around land that cannot be developed. If this is to be a key component then it needs certainty that it can be managed as such. The expectations for this park should reflect the habitats within neighbouring Galway Bay, which may require frequent flooding to function. It is not clear if this has really been considered.</p> 
<p>Volume 1 Chapter 2 Core Strategy, Settlement Strategy and Housing Strategy Volume 2.</p>	<p>2.4.5 MASP</p>	<p>SS1 MASP (Level 1) Various objectives in Volume 2 MASP GCMA2</p>	<p>The Galway Metropolitan Area, the subject of the MASP, extends from Bearna in the west to include Galway City and suburbs and continuing eastwards to Baile Chláir and Oranmore. The eastern Metropolitan Area includes planned growth areas at Ardaun, Garraun and Briarhill. Garraun and Briarhill are identified as key strategic growth areas within County Galway that will contribute significantly to meeting the aspirations of the NPF and RSES. Urban Framework Plans have been prepared by Galway County Council for both Garraun and Briarhill and are included Volume 2 of this plan. The role of the Metropolitan Area is to accommodate population</p>

<p>Metropolitan Area Strategic Plan</p>			<p>growth within the area that will ensure the vitality and appeal of Galway City and the surrounding towns and village settlements.</p> <p>It appears that Garraun is being proposed as a standalone plan. This is not appropriate because Garraun is directly adjacent to existing development in Oranmore and should be considered as part of Oranmore. Other MA's are stand alone and do not join existing town centres unlike Oranmore and Gurraun. This is contrary to proper planning (GCMA 2) having two town centres within such a short distance. This allows the council to ignore Oranmore and its needs while doubling its capacity.</p> <p>This is important because the new population at Gurraun is estimated at 4,500; new houses, new families equal new kids. All existing primary schools are in the centre or south side of Oranmore. With no safe infrastructure and Garraun being outside walking distance everyone will be forced to drive. Restaurants, coffee shops, groceries and supermarkets are all in Oranmore so again there will be constant movement of residents from one MA to another. The plans are stand alone, they need to address linkage via roads, cycleways etc.</p> <p>This also works the other way as there are no plans to deal with Oranmore residents accessing Gurraun\railway, or the proposed employment areas in Garraun.</p> <p>There is no assessment or evidence on the potential impact of this development on Oranmore. This is a significant omission to the public consultation.</p> <p>What schools will be impacted? Will there be new schools? Who is responsible for ensuring delivery and funding of new schools, or additional school places and facilities, and does the council have any influence on this? Will this be a new secondary or primary school? Has current and projected school capacity and demand been modelled to demonstrate the viability of the proposal, and also to ensure sufficient supply of school places will be provided?</p> <p>What walking/cycling infrastructure will be provided to minimise traffic congestion?</p> <p>What public amenities will be provided to support the population in this area?</p> <p>Will the parks and sports pitches identified be owned by the council, developer or sports clubs? Will they be accessible to all of the community or just clubs? Will they be developed first or afterwards?</p>
<p>Volume 1 Chapter 2 Core Strategy, Settlement Strategy and Housing Strategy</p>	<p>2.4.7 Area of Strategic Potential</p>		<p>Economic corridors particularly employment corridors such as the Oranmore – Athenry Strategic corridor must be developed/promoted and serviced to high international standards to attract further Foreign Direct Investment and indigenous industries/ businesses, building on the existing strategic location and infrastructure. This corridor will be promoted sustainably as a centre for major national and international enterprises in a manner that shall be further defined in local planning policies.</p>

<p>Volume 2. Metropolitan Area Strategic Plan</p>			<p>How will these employment corridors be supported in terms of transport infrastructure?</p> <p>What rail, light rail, cycling and other sustainable mobility plans are to be put in place? Is the council in a position to deliver these, and if not, what agreements with 3rd party operators are in place to deliver the plan objectives?</p> <p>What incentives will be provided for employers to allow staggered/remote working to help reduce traffic congestion at peak times? If the council is not able to deliver this, what agreements are in place with 3rd parties to enable this?</p>
---	--	--	--

Volume 1: Chapter 3 - Placemaking, Regeneration & Urban Living

Paragraph	Policy Objective	Submission
<p>3.5 What is Placemaking?</p>	<p>PM 1 Placemaking</p>	<p>What pedestrian and cycle connections? Safe, segregated cycling to Parkmore?</p> <p>For example, in the case of Garraun, the Urban Framework Plan (UFP) is centred around Oranmore Train Station which is a sustainable public transportation corridor while the Briarhill UFP has developed with pedestrian and cycle connections to Parkmore as the primary means of travel to that employment site. Chapter 15 Development Management Standards sets out further steps to be taken to achieve good placemaking.</p>

Volume 1: Chapter 4 - Rural Living and Development

Paragraph	Policy Objective	Submission
<p>4.6 Rural Housing Strategy in the Open Countryside</p>		<p>The population variation between the 2006 and 2016 Census is significant. (a) In the GCTPS area, the population in Electoral Divisions (ED's) has increased in excess of 10 to 25% and in some ED's this increase is in excess of 25%, especially around Athenry and Oranmore acknowledges significant population growth.</p> <p>Has there and will there continue to be a representative 25% increase in funding allocation for Oranmore and Athenry over this period.</p>
<p>4.6.1 Rural Areas under Strong Urban Pressure – Metropolitan Area and GCTPS</p>		<p>With the designation of the Metropolitan Plan for Galway city and environs which encompasses the settlements of Bearna, Baile Chláir and Oranmore it is considered that the rural areas between these settlements and the administrative boundary of Galway city should be protected from sporadic rural housing. Within the metropolitan area of the county, the applicant must be from a member of farm family and meet a number of criteria which will be outlined in policy objectives to follow.</p> <p>It is important that rural development is not restricted to one occupancy or for families who happen to own land as this could potentially be discriminatory to others. The intention to retain vibrant rural activity is welcome.</p>

Volume 1: Chapter 5 – Economic Development, Enterprise and Retail Development

Paragraph	Policy Objective	Submission
5.3 Strategic Context	ES1 Economic Strategy EL 3 Atlantic Economic Corridor	<p>Objective EL3 which is supportive of infrastructural investment seeks a collaborative approach with the IDA Ireland to promote Galway as a location for Bio-Pharma development and investment, leveraging off the existing Life Sciences cluster including the Monksland area of County Roscommon and the existing utility-intensive Strategic Sites in Oranmore and Athenry.</p> <p>With increased industrial activity in Oranmore, what infrastructure and amenities will be developed in support of this?</p> <p>When can we expect pedestrian and cycling links to each of the industrial estates to facilitate reduction in traffic in the area?</p>
5.5.2 Economic Profile and Jobs Ratio of Settlements	ES1 Economic Strategy EL 1 Key Employment Locations SCO 8 Hubs and Remote Working	<p>Maigh Cuilinn, Oranmore and Bearnna have a jobs ratio of 0.53, 0.438 and 0.452 respectively which indicates high levels of outbound commuting. Oranmore and Athenry also have low jobs ratios of 0.438 and 0.767, respectively. In contrast to policies for Maigh Cuilinn and Bearnna, policy objectives for both towns to grow their employment base as part of the Oranmore-Athenry Strategic Economic Corridor is provided through its designation as a location with strategic development potential of a regional scale. Policy objectives to support investment in employment at Oranmore, and Athenry are provided below.</p> <p>The objective to grow jobs within the Oranmore area is very welcome. How will this be supported by travel infrastructure - walking, cycling, bus, rail etc? A specific and explicit transport strategy for the Oranmore-Athenry Strategic Economic Corridor should be included in the plan, with detailed objectives and stated targets for the number of commuters walking, cycling, and travelling by bus and rail. These targets should be aligned with national transport, environmental and carbon emission reduction objectives.</p> <p>Increased employment in Oranmore will mean increased inbound commuting. What arrangements are being made to handle increased traffic volume?</p> <p>How will the objective for hubs and remote working be achieved? What actions will the council implement to deliver the vision?</p>
5.5.4 County Galway Metropolitan Area Strategic Plan	EL 4 Former Galway Airport	<p>The primary centre identified for growth in the region is Galway City through its designation as a Metropolitan Area in the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES). The Galway Metropolitan Area Boundary encompasses both City and County Council areas (Baile Chláir, Bearnna and Oranmore) and the MASP sets out the strategic direction the city will grow to achieve compact growth. Both Oranmore and the former Airport Site are identified as key industry and technology sites within the MASP.</p> <p>The RSES acknowledges that Oranmore forms a significant proportion of the land supply and can accommodate future large-scale employment. These lands benefit from being easily accessible due to the improvement of the wider road network in the form of the M6 and M17/M18 motorways. RPO 3.6.5 supports the delivery of lands for employment uses at Parkmore, the former Airport site and Oranmore.</p> <p>The focus seems to be on car access and improvement of the wider road network. There is no mention of rail, light-rail, bus, cycle, or pedestrian linkages. This is a significant omission. The CDP must include specific and explicit provision for Active Travel infrastructure, in particular</p>

Paragraph	Policy Objective	Submission
		<p>the delivery of safe, segregated walking and cycling to facilitate access from the new development at Garraun, from Oranmore, and from Maree for workers living in the area. Development of lands for industrial, manufacturing, and other commercial activities must be accompanied by parallel development of the necessary Active Travel infrastructure, to ensure avoidance of mass congestion and provide access to these employment opportunities for everyone in the community.</p> <p>Drainage is mentioned as an issue for the area. This should be resolved in the development plan.</p> <p>Need specific details of proposed connectivity for the rail line. Need to create cycle routes to allow people travel safely by bike to the site.</p>
5.7.1 Strategic Economic Corridor	EL 2 Strategic Economic Corridor	<p>Central to the development strategy for Galway is the designation of the Strategic Economic Corridor (SEC) between Oranmore and Athenry.</p> <p>The SEC runs east from Oranmore to Athenry and is part of the long-standing economic development strategy for the county which has identified priority areas for economic development. The alignment of the corridor is based around that of the Galway to Dublin railway line and the M6 road corridor.</p> <p>This is a strategically important area which is highly accessible and has easy access and a high concentration of established and valuable infrastructure. This area has the 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.</p> <p>The extent of the SEC has been approximately defined as being 2 kilometres to the north and the south of the Dublin-Galway railway line between the Attymon Train Station and the R381 level crossing at Oranmore. The RSES makes reference to this Oranmore – Athenry Corridor as an example of an opportunity for economic development that should be promoted and to assist in the identification of suitable sites. This SEC should also be serviced to high international standards to attract further FDI and indigenous industries which would further develop the SEC as a strategic location with readily accessible infrastructure.</p> <p>In order to support this economic development and employment creation, it must be possible for people to access the area by a range of transport methods.</p> <p>Car traffic will increase congestion and add to existing traffic problems in Oranmore. The corridor is to run from Athenry to Oranmore, so transport links from Galway to Oranmore and Athenry should be significantly enhanced along the rail line. Every train running along the line should stop at Oranmore and Athenry, and short, frequent commuter services should be added, if possible.</p> <p>In the longer term, a light rail system stretching out to Athenry and Oranmore from Galway city and new and proposed employment centres, would be desirable, similar to the Luas system operating in Dublin, but based on the cheaper very light rail system being utilised in Coventry in England.</p> <p>Service must also include high quality cycle and walking infrastructure, particularly in light of the proposed high volume housing plans for Oranmore and for Athenry. Need to focus on providing means for people who live and work in the area to travel without needing a car.</p>

Volume 1: Chapter 6 - Transport and Movement

Paragraph	Policy Objective	Submission
<p>6.3.2 Regional Spatial and Economic Strategy (RSES)</p>	<p>All objectives in section 6.</p>	<p>The RSES supports transition from the private car to alternatives and promotes greater efficiency in the use of the transport networks. RPO 3.6.7 of the RSES supports the provision of a new N6 Galway City Ring Road (N6 GCRR) which represents a key priority for the Galway metropolitan area.</p> <p>This section starts off well with focus on transition from private car to alternatives, but then moves straight to priorities of maintaining the national roads network and future capacity enhancements. This is a complete contradiction.</p> <p>If the focus is to move from private car dependence, then the focus for the plan should be on rail, light rail, cycle routes and buses to move people.</p> <p>For rail services it is important to have a regular service from Athenry to Galway, as well as other new stations at regular spacing along the route into Galway City to reduce the need to travel by car. These include:</p> <ul style="list-style-type: none"> • Consideration of reinstating the Derrydonnell station in Oranmore, with park and ride. • Connections from the stations to Ardaun, as well as Garraun, Parkmore, Briarhill and the Airport site. • A station near Castlegar • Stations at Kiniska/Ballyloughane. <p>We propose the following hierarchy for transport and movement: Primary: Vulnerable road users (i.e., the visually impaired, pedestrians, cyclists and children coupled with public transport) Secondary: Low or zero tailpipe emission vehicles. Tertiary: Cars, vans and HGVs.</p>
<p>6.3.2 Regional Spatial and Economic Strategy (RSES)</p>	<p>PT 1 Sustainable Modes of Transport</p>	<p>We strongly support the following key priorities outlined in the RSES: Support for Local Transport plans for Ballinasloe and Tuam; Support for the delivery of Greenway Network to include National Dublin to Galway Cycleway, Oranmore to Bearnna Coastal Greenway and the Galway to Clifden Greenway; Support for an enhanced and more connected provision of public transport service including the rural transport programme; Support for the delivery of the rail projects including a dual railway track between Galway and Athlone; Support provision of Smarter Travel infrastructure;</p>
<p>6.5.1 Integrated Land Use and Transport Planning</p>	<p>ILUTP 1 Sustainable Transportation ILUTP 2 Local Transport Plans</p>	<p>The Plan strongly supports the creation of compact urban growth, consolidation of existing settlements and the development of brownfield lands which are all further expanded in Chapter 3 Placemaking, Regeneration and Urban Living across the settlement hierarchy.</p> <p>The promotion of brownfield development and consolidation of existing settlements supports a more sustainable modes of transport, namely walking, cycling, and public transport as viable alternatives to the private car.</p> <p>The plan promotes the creation of transport hubs and enhanced public transport infrastructure to facilitate increased capacity and additional service. At strategic locations along these public transport corridors the plan promotes higher density development which</p>

Paragraph	Policy Objective	Submission
		<p>will increase the number of people within the walking catchment of the public transport service, which will increase the numbers of passengers using the service and leads to an increase in the overall economic viability of the service and consequently reduce greenhouse gas emissions due to the reduced numbers dependent on cars.</p> <p>This strategy is evident within the plan through the preparation of the Garraun Framework Plan which has identified lands for development around the existing train station in Oranmore. A number of infrastructural works are required to the existing train line which will result in increased frequency and capacity of the train service.</p> <p>To ensure that the vision for the plan is delivered, it is critical that transport hubs are clearly defined. Do these include Rail? Light-rail services? Connections where bus and rail join? What about cycle and rail connections? Will there be secure bike parking at Park & Ride facilities to allow people travel their first/last 1km to 2km by bike, then access high volume transport system (rail or light rail), as per European models? The County Development Plan needs to include specific, detailed and explicit plans for the development of Active Travel connections between these transport hubs, including segregated cycle networks, and footpaths, to support and encourage their use.</p> <p>If increasing volume of people, then footpaths in the area need to be correspondingly wider and of significantly better quality than presently. They also need to meet disability criteria so that wheelchair users and others with a disability can access public transport with ease.</p> <p>There should be secure bike lockers to allow people cycle from e.g., Maree, lock up bikes, train to Galway or Athenry and then cycle home again. Same for bike lockers at bus stops and transport hubs. What is the delivery plan and mechanism for getting other parties to develop transport hubs and to install suitable bike lockers and other associated facilities?</p>
6.5.1 Integrated Land Use and Transport Planning	ILUTP 1 Sustainable Transportation ILUTP 2 Local Transport Plans	<p>The plan has laudable aims to encourage transition towards sustainable and low carbon transport modes, through the promotion of alternative modes of transport, and ‘walkable communities’ together with promotion of compact urban forms close to public transport corridors to encourage more sustainable patterns of movement.</p> <p>We believe the plan needs to be more specific to ensure these can and will be delivered. How much will be spent on walkable communities? What does this mean? What standards will be applied in terms of design and connectivity to facilitate pedestrian/cycling connections to public transport corridors? How many kilometres of cycle network will be delivered each month/year of the plan? Galway City is only 10km from Oranmore. When will a segregated protected cycle track be delivered to allow residents to cycle to the city? What about a cycle network connecting Oranmore and Athenry with connections all along the Strategic Economic Corridor?</p>
6.5.2 Sustainable Transport	ILUTP 1 Sustainable Transportation	<p>The transition to more sustainable transport within the county is considered essential in order to meet the requirements under section 10(2)(n) of the Act (Climate.).</p> <p>We propose the following hierarchy for transport and movement: Primary: Vulnerable road users (i.e., the visually impaired, pedestrians, cyclists and children coupled with public transport) Secondary: Low or zero tailpipe emission vehicles. Tertiary: Cars, vans and HGVs.</p>

Paragraph	Policy Objective	Submission
6.5.2.1 Walking and Cycling	WC 1 Pedestrian and Cycling Infrastructure WC 2 Bicycle Parking WC 3 Sustainable Transport Movement WC 4 Modern Network of Walking and Cycling Infrastructure WC 5 Traffic Free Cycle Routes	<p>There are a number of benefits to the promotion of both walking and cycling including a reduction of congestion in urban areas, reduced greenhouse gas emissions, a healthier population, enhanced quality of life and more sustainable communities. The more people who can actively be encouraged to both walk and cycle will also result in a reduced number of private cars within our urban areas resulting in a lower demand for parking spaces and street space which could result in enhancements of the public realm in our urban areas.</p> <p>This plan supports the design standards contained within the National Cycle Manual and the Design Manual for Urban Roads and Streets in terms of the design of pedestrian and cycling infrastructure with all new developments required to demonstrate how their proposals would be in accordance with these documents. The implementation of the principles of good urban design through the arrangement of land uses and the creation of well-connected streets and neighbourhoods between residential areas, neighbourhood centres, schools, and places of work, will encourage people to walk and cycle more frequently. The key component is the development of segregated cycle tracks so that people who would not otherwise cycle will feel safe to do so, as reflected in the results of our survey.</p> <p>This focus is on new developments. It is critical that the plan includes objectives for retrofitting existing communities and making them desirable places to walk and cycle. We believe there is no point in having great cycle lanes in a new estate if it is still unsafe for children to cycle down the Maree Road to school, for example.</p>
6.5.2.1 Walking and Cycling	WC 1 Pedestrian and Cycling Infrastructure WC 2 Bicycle Parking WC 3 Sustainable Transport Movement WC 4 Modern Network of Walking and Cycling Infrastructure WC 5 Traffic Free Cycle Routes	<p>With regards to these policy objectives, we feel they are all aspirational without any specific targets related to delivery of infrastructure or change and so not measurable. It is good to see this documented, but it is mostly the same as the 2015 plan.</p> <p>What is the proposed delivery mechanism and funding source for these objectives?</p> <p>We also note that the 2015 county development plan included a policy objective: “Design and develop the provision of a coastal walkway/cycleway from Bearna to Oranmore in conjunction with Galway City Council.”. To our knowledge there has been no progress on this, which does not give confidence in the ability to deliver the plan.</p>
6.5.2.2 Greenways and Blueways	GBW 1 Greenways GBW 2 Future Development of Network of Greenways	<p>The focus here is on the greenways and blueways as recreational space and on tourism. This is welcome. However, there must be a focus on delivering greenways as connecting towns and villages and useful for commuting purposes, and for transport between towns for matches, sports events, school events etc.</p> <p>Use them as a means of independent travel for older children and adults.</p> <p>Need to move away from seeing bikes as recreation and instead treat them as modes of transport.</p>

Paragraph	Policy Objective	Submission
6.5.2.3 Electric Vehicles	EV 1 Electric Vehicles Charging Infrastructure	<p>How do the council propose to deliver electric car charging points on council owned land, and also in the transition from privately owned petrol stations to electric car charging stations?</p> <p>The current allocation of one or two spaces per car park is insufficient.</p> <p>Will the plan also support the ability to charge electric bikes and scooters?</p> <p>How will the Council ensure that electric charging points will not impede on pedestrian or cycling infrastructure and will not create obstacles for those with disabilities in navigating paths, parks, car parks, shopping centres etc?</p> <p>Will charging points be obligatory for all new housing developments. Will petrol stations be actively encouraged to include charging points on their properties?</p>
6.5.2.4 Public Transport	PT 5 Park and Ride	Park & Ride facilities should have secure covered bicycle parking as part of their build so that bike users can also avail of Park & Ride.
6.5.2.4 Public Transport	<p>PT 1 Sustainable Modes of Transport</p> <p>PT 2 Development of Public Transport Infrastructure</p>	<p>These policy objectives for sustainable transport have an aspirational focus. They are immediately followed by an objective which focuses on parking for buses.</p> <p>There is a need to move to non-polluting, time-consistent modes of travel. Buses operate to a timetable and have to travel in car traffic which makes them a last choice option. Rail and light-rail do not have to compete with car traffic and can offer consistent travel times.</p> <p>Cycling offers independent travel, with no requirement to stick to a timetable. It also offers the option for non-motorists to access public transport, (e.g., cycling from Maree to Oranmore, then getting train from Oranmore to Athenry) but in order for this to happen, there must be secure bike parking facilities available at bus stops and Park and Ride locations.</p>
6.5.3 Roads	PRP 1 Proposed Roads Projects	<p>There is no question that a lot of roads in Galway need upgrading. However, no sign of local roads in Maree here which are in very poor condition, have minimal safe cycling and walking infrastructure on this.</p> <p>We note the peculiar mention of a car park for Oranmore. It is not clear why this is necessary when there is sufficient car parking available, much of which is not open due to legal disputes.</p> <p>The Oranmore car park is not necessary if existing privately owned car parking can be put into use as they should be under the terms of granted planning applications.</p>
6.5.3 Roads	<p>PRP 1 Proposed Roads Projects</p> <p>Oranhill Link Roads. To complete link roads.</p> <p>N6 at Carrowmoneash Investigate and provide for a</p>	<p>In relation to the Oranhill link roads, the ownership of the road is a critical issue that needs to be resolved, or an alternative solution sought. The existing junction with the Maree Road is extremely hazardous due to high traffic speeds and high traffic volume.</p> <p>If road improvements here are to be listed in the development plan as policy objectives they must be deliverable. If they cannot be delivered they should not be in the development plan.</p> <p>What is the delivery mechanism and funding source for commissioning or taking in charge objectives related to new roads and improved junctions? The plan must state how objectives can be delivered, especially where privately owned roads form part of the network of streets required to achieve the objective.</p>

Paragraph	Policy Objective	Submission
	to link to Oranmore pedestrian crossing. Industrial Area on N18.	
6.5.3.1 National Roads	NR 2 Key Roads Infrastructure Developments	<p>The focus on the Ring Road is inconsistent with Climate Change and with Population Growth objectives. If the intention is to grow populations on existing footprints, then the focus should be on high-volume transport models, not private cars. The money for this would be better spent on a very light rail system which is compatible with the high-density housing, which is proposed, as it supports living with a close distance of the city, reduces car dependency and urban sprawl and provides a time-consistent means of travel within the city and suburbs.</p> <p>Cross-county connectivity between areas west and east of Galway City is important for economic and social reasons. The Galway City Transport Strategy states that cross-city traffic is a low proportion of total traffic. Enabling more desirable local transport and mobility options will reduce traffic and make cross-city journeys more reliable, without the need for a ring road. Transport hubs for those travelling into and around the city are therefore critical and much less expensive than the bypass.</p>
6.5.3.2 Non-National Roads	<p>NNR 4 Traffic Management in Town Centre</p> <p>NNR 5 School Travel Plans</p> <p>NNR 8 Car Parking</p> <p>MASP objectives for Oranmore.</p> <p>OMSP 2 Sustainable Town Centre</p> <p>OMSP 6 Tourism Development</p>	<p>This policy objective is exactly what MÓR Action looked for with a trial one-way system. We wish to understand why the Council propose this as part of the development plan but refused it when requested by residents to implement a trial?</p> <p>We feel that there are many options to reduce traffic, increase space for people and make travelling to school safer in Oranmore without compromising overall parking capacity. For example, this could easily take a lane on each side of Main Street and convert to segregated cycle lanes to facilitate safe access from Coill Clocha and Clogh Og. Further a continued cycle route on the coast road including Costa Na Mara, and along the Maree Road.</p> <p>Objectives NNR4 and NNR5 must be included in the MASP plan for Oranmore, with explicit responsibility for delivery and funding assigned. The Terms of Reference for both must include consultation with the community and individual members of the public.</p> <p>If the focus is on reducing private car dependence, then parking should be deprioritised and bike parking, public seating and bus shelters should be prioritised.</p>

Volume 1: Chapter 7 - Infrastructure, Utilities & Environmental Protection

Paragraph	Policy Objective	Submission
7.5.5 Wastewater	WW 1 Enhancement of Wastewater Supply Infrastructure	This plan will support the investment for both new and enhanced infrastructure and utilities particularly from a water and wastewater perspective which are critical to ensuring economic growth and investment, the delivery of employment opportunities, compact growth of our settlements and more sustainable communities.

Paragraph	Policy Objective	Submission
	<p>WW 2 Delivery of Wastewater Infrastructure</p> <p>WW 3 The Greater Galway Area Drainage Study</p> <p>WW 4 Requirement to Liaise with Irish Water – Wastewater</p> <p>WW 7 Sustainable Drainage Systems</p> <p>WW 8 Storm Water Infrastructure</p>	<p>In Oranmore, our water and wastewater networks are at capacity already, never mind with the development of Garraun and a 30% population increase in the next 5 years. We recognise and welcome the proposed improvements to network capacity which must be considered a prerequisite for any new development.</p> <p>Where can we follow these developments in real-time to make sure they are actually meeting deadlines?</p> <p>We need to know dates, deadlines, and where this can be tracked and monitored, so that housing/industrial development does not outstrip provision of water/wastewater.</p> <p>To further increase capacity, the retrofit of Sustainable Urban Drainage feature should be within the plan with the specific aims of: reducing load on misconnections in the network from reduced runoff and increased interception at gullies and drains, increase resilience to climate change again through increasing network capacity. Delivering multiple benefits through public realm, biodiversity, etc.</p>
7.6 Waste Management	<p>WM 2 Requirements for Waste Management</p> <p>WM7 Recycling Infrastructure</p> <p>WM 8 Sustainable Waste Management Practices</p>	<p>The Council recognises the importance of waste management and will promote the circular economy principles, prioritising prevention, reuse, recycling and recovery, and to sustainably manage residual waste which will contribute to more sustainable communities for the existing and future population of County Galway. The Council also recognise the importance of the provision of enhancement of digital infrastructure from both a domestic residential perspective and also in terms of supporting the economic growth of the county.</p> <p>With regards waste management, there could be an opportunity here for development of a Community Repair Hub this would be a place for people to gain new skills, and also a community resource, which could help with projects for Tidy Towns, Art Festivals etc. We propose this as something which should be included as part of the development plan.</p>
7.6 Waste Management (WM)	WM 5 Construction and Environmental Management Plans (CEMPs)	<p>We support the requirement for construction environment management plans. In addition to the requirements listed in WM 5, we request the following additions: That neighbouring properties, businesses, residents and other users are engaged with by those preparing CEMPs. That specific limits are placed on acceptable dust, noise, vibration and traffic.</p>
7.4 Climate Change	None listed.	The resilience of infrastructure to climate change is fundamental, yet there are no policy objectives noted to ensure resilience of critical infrastructure is achieved.
7.9.1 Air Quality	<p>AQ 1 Ambient Air Quality</p> <p>AQ 2 Assessment of Air Quality</p>	<p>In the interest of protecting the health of our children and wider population, we request that an air quality monitoring programme is established for Oranmore town centre (to include rush hour, school times, and poor weather conditions that favour high levels of air pollution). If necessary mitigation measures should be put in place in consultation with the local community.</p>

Paragraph	Policy Objective	Submission
	AQ 3 Air Quality Mitigation Measures	
7.9.5 Major Accidents and Seveso Sites	<p>MAS 1 Separation Distances from SEVESO Sites</p> <p>MAS 2 Soil Protection Measures</p> <p>MAS 3 SEVESO III Sites</p>	<p>The Health and Safety Authority (HSA) provides advice to Planning Authorities, where appropriate, in respect of planning applications for development within a certain distance of the perimeter of these sites. There are two SEVESO sites in County Galway which includes the Chemoran facility at Deerpark Industrial Estate in Oranmore and the Tynagh Energy Ltd. All development proposals involving existing or proposed facilities classified under the Seveso II Directive will be referred to the Health and Safety Authority whose technical advice shall be taken into account in addition to any normal planning considerations.</p> <p>Seveso Sites are defined as Industrial sites that, because of the presence of dangerous substances in sufficient quantities, are regulated under Council Directives 96/82/EC and 2003/105/EC, commonly referred to as the Seveso II Directive.</p> <p>These constraints must be considered in any future development application.</p> <p>We also kindly request that the community is made aware of and understands the risks and relevant actions within any emergency response plans from existing Seveso sites, where impacts could arise through soil, surface or groundwater air, dust, noise or other forms of pollution.</p>

Volume 1: Chapter 8 – Tourism and Landscape

Paragraph	Policy Objective	Submission
8.3.2 Regional Spatial and Economic Strategy	<p>GBW 1 Walkways and Cycleways</p> <p>GBW 2 Future Development of Network of Greenways</p>	<p>The Regional Spatial and Economic Strategy (RSES) identifies the importance of recreational tourism particularly within our countryside and coastal areas, and trails. The enhancement and development of water-based leisure sector, greenways, blueways, bridle routes have been emphasised. The Strategy supports the delivery of the National Dublin to Galway Cycleway, Oranmore to Bearna Coastal Greenway and the Galway to Clifden Greenway.</p> <p>The Oranmore - Bearna Coastal Cycleway was to have been designed and developed under the 2015-2021 plan. Nothing has been delivered.</p> <p>We believe the focus needs to move from recreation to commuter and local use. There are of course tourism related benefits we welcome, but priority should be on the everyday connection of Oranmore to Galway City so that residents working or studying in the city can travel safely in by bike.</p>

Volume 1: Chapter 10 - Natural Heritage, Biodiversity and Green/Blue Infrastructure

Paragraph	Policy Objective	Submission
10.16 County Galway's	BGP 2 Development of	We welcome the inclusion of all greenways proposed, however these are all undelivered objectives carried over from the 2015 plan.

Paragraph	Policy Objective	Submission
Network of Blueways, Greenways and Peatways	Strategic Greenway Network	These must be pushed as a key deliverable under the new plan. We request that the Council commit to a timeline for delivery.
10.6 Natural Heritage and Biodiversity	NHB 5 Ecological Connectivity and Corridors NHB 9 Protection of Bats and Bats Habitats WTWF 1 Wetland Sites TWHS 1 Trees, Hedgerows, Natural Boundaries and Stone Walls GBI 1 New Developments (green infrastructure) GBI 2 Green/Blue Infrastructure Network	Without proper baseline mapping of ecological corridors, green infrastructure, bat activity and habitat, wetland sites, hedgerows and natural boundaries, it is not possible to ensure these are protected. We request that the location, condition and ecosystem services provided by these features are mapped and understood.
10.6 Natural Heritage and Biodiversity	NHB 10 NPWS & Integrated Management Plans	The council should push for the production of Natura 2000 designated site conservation management plans as these are key documents to inform the development plan, and subsequent developments. Without these site-specific management plans it is significantly more challenging for proposed developments to be designed in a manner which is complementary to biodiversity objectives for the protection and enhancement of species and habitats of European interest.

Volume 1: Chapter 11 – Community Development and Social Infrastructure

Paragraph	Policy Objective	Submission
11.12 Young People and Children 11.14 Sports, Recreation and Amenity	SRA 4 Passive and Active Open Space	There is very little in the plan and policy objectives related to the provision of places, facilities and amenities for teenagers. There should be specific provision for facilities and amenities for teenagers in Oranmore which can be safely accessed by foot or bike, so that teenagers can travel independently to these amenities and facilities. Given the lack of amenities and facilities for teenagers, such as passive recreation amenities (excluding sports facilities) in Oranmore, it is likely they will want to meet friends in Galway

		City and Salthill. For this to happen safely it is critical that safe public transport, with through services that do not require changing of buses, are provided. Timetables must ensure frequent services that extend into the evenings to ensure teenagers can get back home safely and in good time.
--	--	--

Volume 1: Chapter 15 – Development Management Standards

Paragraph	Policy Objective	Submission
Development Management Standards	DM Standard 48: Field Patterns, Stone Walls, Trees and Hedgerows	Given the biodiversity crises and climate emergency, we request in the strongest manner that existing hedgerows and trees are retained where possible.

Volume 2: Metropolitan Area Strategic Plan

Paragraph	Policy Objective	Submission
1.6, 1.7 Density Typology and Tall Buildings	GCMA 16 and 17.	Compact growth is noted as being a good means of achieving the development plan vision. We note that the policy objective is that a “density typology study will be initiated during the lifetime of the plan”. We believe that a density typology study should be part of the evidence base for the plan and used to set appropriate development management standards for specific zoning designations. Of greater importance, we wish to understand what opportunity the public will have to comment on this density typology study as it in effect sets the land use zoning.
1.3 connectivity 2.14.3 Transport and Movement		We welcome the elevated status the plan gives to Oranmore station, however we believe that the objectives for connectivity should not be solely reliant upon the station as this only connects limited destinations. It is critical that connectivity from Oranmore to: Maree and Renville, Parkmore, Briarhill, Airport Zone, Athenry, Galway City and more are established with specific policy objectives in the plan. These should ensure sustainable mobility and transport infrastructure as well as public transport. We note that there is no policy objective associated with this statement.
1.9.2 Town Centres 2.13.2 Town centre / retail Oranmore	GCMA 2, GCMA 5 OMSP 2, OMSP 3, OMSP 15	<p>We do not believe it is appropriate for some land uses within town centres to dominate the public realm. We strongly agree with the statement that “town centres must prioritise visitors who travel on foot and those with impaired mobility”. The current land use in some town centres, such as filling stations, directly contradicts this principle.</p> <p>The Oranmore plan has a specific objective for non-conforming land uses. This objective should be actively pursued in the town centre so that land uses are genuine destinations which people will walk and cycle to.</p> <p>The policy objective that a “traffic mobility plan will be required for new or existing employment developments” is welcome, but the specification for these traffic mobility plans needs to be set. We also hope that Galway County Council will have the impartial evidence at their disposal to ensure evidence-based decision making on the traffic impact of all developments.</p>

Paragraph	Policy Objective	Submission
		<p>We wish to see specific objectives on how Galway County Council will encourage re-use of derelict and vacant buildings, including the upper floors. What funding and legislation is in place to deliver this?</p> <p>Specifically, for Oranmore we welcome the statement that “the town centre and associated Main Street shall remain the primary focus for retail and service activity within these plan areas”. We believe this must include specific points including:</p> <ul style="list-style-type: none"> • Significant public realm improvements • Traffic reduction and removal • Alternative traffic routes • Safe access for residents and visitors by foot or cycle. • And specifically unique for Oranmore is that four schools are located in the town centre and so unique measures are needed. • Significant movement on dealing with the many derelict properties on Main Street.
1.9.4 Community facilities	OMSP 8	<p>We have concerns that the plan cannot guarantee timely provision of community facilities. Based on recent experience we do not believe the following statement will deliver “for the most part, the provision of community facilities will be provided by developers in agreement with the relevant stakeholders”.</p> <p>The policy objective for Oranmore is “to seek provision of...”. This is not sufficient to enable provision of community facilities. There should be a firm commitment to deliver community facilities, with funding, location and Active Travel infrastructure included as part of these facilities. The Community Development Plan should include specific deliverables and timelines for Oranmore, particularly in light of the proposed MASP and Garraun population increases.</p>
1.9.5 Open Space		<p>The Oranmore to Bearna Coastal Greenway is mentioned throughout the plan documents. Who will deliver this plan? When will it be delivered? There should be a specific policy objective for this in the MASP?</p>
1.9.7 Climate Change / Flooding 2.15 Climate change and flooding	GCMA 13b, GCMA 18	<p>We believe that the Flood Zones should be the future climate change flood zones. We also note that the coastal flood zones are not based on the latest ICWWS 2018 water level data, which is available online from www.floodinfo.ie. For reference, a screenshot is included below. This shows the current and future peak water levels. The current 0.5% annual exceedance probability (AEP) flood level will be the 10% AEP flood level in the Medium Range Future Scenario. Current evidence suggests the High-End Future Scenario can be reasonably expected by the end of the century and this would mean the current 0.5% AEP flood level will have a 50% AEP change of occurring each year. What is currently a major once in a lifetime event will be happening every other year.</p> <p>We also wish to understand why there has been no detailed flood hazard mapping of any of the MASP settlements. As these are critical to delivering the core strategy, flood risk constraints should be understood in greater detail than the Catchment Flood Risk Assessment and Management (CFRAM) study, especially as the new ICWWS 2018 coastal flood level data is now available.</p> <p>There is an opportunity to consider Sustainable Drainage Systems (SuDs) retrofit, as a measure to work towards resilience to climate change, which has not been taken.</p> <p>There is no consideration of how to ensure continued resilience to flooding of coastal communities under climate change. With the Garraun land zoning, if access to the R446</p>

Paragraph	Policy Objective	Submission
		<p>cannot be secured, the main access and egress for a significant population will be through current flood zones, with increased flooding under climate change scenarios.</p> <p>There is also no consideration of the role of biodiversity and nature-based solutions in managing flood risk and coastal erosion.</p>
2.15 Climate Change		<p>We would like to see more specific emphasis and objectives on concepts that can reduce car travel and in turn reduce carbon emissions. Concepts such as the 15-minute city where all of the everyday amenities (schools, shops, transport hubs) are within 15-minute walk for residents. If these concepts or some more radical societal change occurs then we cannot see how an increase in population will not result in increased traffic.</p> <p>It is critical that new developments, such as Garraun do not end up like Oranhill with a gaping hole in the middle where community facilities should be located.</p>
1.10.2 Zoning matrix	OMSP 9	<p>What guarantees are there that if a hotel is permitted in residential zoned land, that it does not constrain the ability to achieve the core strategy objectives.</p> <p>There is a specific objective to provide community facilities in Oranhill. This is welcome but has been promised for more than a decade with no progression. We also note that the whole of Oranhill is zoned residential so it is key that sufficient community facilities can be allowed for within this zoning plan. The number of people now living in Oranhill is now greater than lived in all of Oranmore 20 years ago. There are no facilities at all, and this will lead to social problems in the medium term which will cost the Council and the taxpayer far more money than providing from them now.</p>
2.13.1 Housing		<p>In relation to the statement “This settlement plan will insist on safe and high-quality pedestrian and cycle connections to local services such as schools, shops and community facilities”, how will the network be completed outside of new developments. What is the delivery mechanism to deliver this? What is the timeline for delivering this?</p>
2.13.2 Town centre / retail	OMSP 2, OMSP 3	<p>We wish to see specific objectives on how Galway County Council will encourage re-use of derelict and vacant buildings, including the upper floors. What funding and legislation is in place to deliver this? This is a key issue for Main Street in Oranmore.</p>
2.13.3 Employment and economic development	OMSP 4	<p>What support will be provided for small businesses to setup offices in the town centre to enhance the vibrancy of the local community?</p> <p>Post COVID-19 Oranmore will have a significant number of workers not based full time in offices. How has this diurnal change in demographics been considered in the plan making process? Has the need for home office space been included in Development Management Guidelines? What land use zoning is appropriate for remote working hubs?</p> <p>It is important to plan and deliver safe access to employment land uses for commuting by foot and cycle, ideally taking direct routes rather than convoluted crossings of main roads.</p>
2.13.8 Community facilities		<p>The plan needs clear statements on the delivery mechanisms for important community facilities that cannot be justified by the open market or charities to provide.</p>

Paragraph	Policy Objective	Submission
2.13.9 Education	OMST 12	<p>Secondary school capacity in Oranmore has already been reached. This needs action now and objectives to support and encourage are not enough if population is to grow significantly. There needs to be an explicit commitment to deliver additional facilities, whether this is in the form of a separate school or the provision of additional classrooms, sport and artistic space at the existing secondary school. Any development must be accompanied by the provision of safe, segregated Active Travel infrastructure to avoid any increase in motor traffic and additional congestion in the village. Currently some children from Maree and Oranmore are travelling to secondary school in Kinvarra. This is not sustainable from a social, well-being or carbon emissions point of view.</p>
2.13.10 Environment		<p>There is no mention here of key ecological corridors and features in Oranmore. The focus on settlement boundaries means that the spatial scale of ecological features and corridors cannot be fully considered on a strategic basis. The lack of evidence as to key connections between habitats and use of habitats is not established. The omission of this baseline means that the plan is not fully holistic. We know for certain that there are notable populations of the following species that are not considered:</p> <ul style="list-style-type: none"> Bat roosts, and foraging corridors Links between the wetland habitats Woodlands, hedgerows and treelines. Mammals such as otter, badger and red squirrels. Coastal and rocky shore habitats Trout in the rivers. <p>To account for this the lands at Carrowmoneash between Oranmore Bridge and the Dual Carriageway should be considered as an extension to the Galway Bay Complex SAC.</p> <p>Ecological corridors between EU designated sites of Creganna Marsh SPA, Inner Galway Bay SPA and Galway Bay Complex SAC as well as other local and nationally important habitats. These should be clearly defined within the land use zoning plans.</p> <p>The plan also takes no account of the Natura 2000 site objectives to protect and restore, and how this affects the land use. Land is zoned as open space, recreation and amenity but this does not ensure clear biodiversity or amenity objectives can be achieved.</p>
Tourism	OMSP 6	<p>Rinville park is a huge asset to the local community of Oranmore and Maree, as well as for Galway City and visitors from further afield. It is worth noting that the park is part owned by Galway City. The MASP does not include Renville and so strategic connections and use of the recreation and open space facilities in the area are not considered in the plan.</p> <p>Despite including a policy objective for tourism in Oranmore, there is no land zoned for tourism use. Proper walking trails for visitors, improved public realm, reduced traffic congestion is required.</p>
Oranmore Recreational facilities	OMSP 10	<p>The policy objective for Oranmore “to encourage and support the development of riverside walkways and cycleways...” is welcome, however these need to be appropriately marked on the land use zoning plan so that they can be considered as part of a transparent and holistic plan.</p>
Oranmore Open space, recreation and amenity	OMSP 11	<p>In Oranmore land zoned for open space needs to have specific and clear objectives to ensure that the open space use is relevant to the local requirements and not just kept as unused land. This needs to be either for biodiversity use, active recreation, passive landscape and amenity or other. For landowners to ensure these objectives are delivered some form of</p>

Paragraph	Policy Objective	Submission
		incentive will be necessary to value and transfer payments to landowners for provision of ecosystem services or green infrastructure.
Garraun and Oranmore		These two settlements are adjacent to each other and will share all services, facilities and amenities. The two must not be considered as separate settlements. Active Travel infrastructure - walking, cycling, buses etc must be developed and implemented in parallel with any development at Garraun, ensuring that Active Travel access between the two locations is immediate, not something to be completed post-build.

Appendix 9: Environmental Reports – SEA Environment Report

Paragraph	Policy Objective	Submission
4.11.2 Baseline Environment - Green Infrastructure		The short paragraph in the SEA Environment Report simply states some of the good things about green infrastructure. There is no mapping or evaluation of the current green infrastructure network, hubs or provision across the county to set the baseline for the assessment of the impacts of the plan on, or provision of, green infrastructure.
4.11.9 Transport		Given that Oranmore is a key settlement, it is disappointing to see that there is no baseline data or information on the current traffic levels within and around Oranmore in the SEA. Without such information it is not clear how the SEA Assessment can reach sufficient conclusions on the impact of the proposed core strategy, or alternative core strategies.
Table 8-3 Motions advised against.		<p>Motions advised against, subsequently agreed upon as amendments and which have potential for significant negative environmental effects. Changing of zoning in Oranmore from Residential to Open Space. Stated reason: flood risk. Site located to the west of the N67 near Carrowmoneash/Frenchfort Stream.</p> <p>We welcome this decision, based on evidence for zoning of these lands within the floodplain as open space. If these lands were to be zoned residential or any other more vulnerable development, it would expose population to unacceptable flood risk, and place an avoidable burden on the local community, County Council and Emergency Services.</p>
Table 8-3 Motions advised against.		<p>Motions advised against, subsequently agreed upon as amendments and which have potential for significant negative environmental effects. The addition of Residential (phase 2) to the south of the existing development envelope (Lands to the south of Oranhill in Oranmore)</p> <p>It is concerning that the County Council propose to zone lands as residential, in specific contravention of the findings of the Strategic Environmental Assessment, without any mitigation measures for the significant adverse effects identified.</p> <p>The benefits of zoning this land to the local and wider community have not been detailed in the plan and therefore there are no reasonable grounds for this land to be zoned residential (phase 2). The reasoning in the SEA assessment is of interest to all of the community in Oranmore because it is all about utilising the town centre, derelict buildings and more compact development with specific reference to sustainable mobility and protection of multiple environmental components.</p>

Paragraph	Policy Objective	Submission
		<p>It is also unfair for landowners to be given expectations for future development which are unlikely to be possible to realise due to these significant adverse effects which have no identified mitigation or monitoring measures.</p> <p>We quote the following, which is clear in giving reasons for why the land should not be zoned.</p> <p><i>“the additional zoning would present additional, unnecessary and potentially significant adverse effects on various environmental components, including:</i></p> <ul style="list-style-type: none"> • <i>Ecology and ecological connectivity;</i> • <i>Increased loadings on water bodies;</i> • <i>Conflicts with efforts to maximise sustainable</i> • <i>Compact growth and sustainable mobility;</i> • <i>Adverse impacts upon carbon emission reduction targets in line with local, national and European environmental objectives;</i> • <i>Adverse impacts upon the economic viability of providing for public assets and infrastructure;</i> • <i>Occurrence of adverse visual impacts;</i> • <i>Cultural heritage; and</i> • <i>Potential effects on human health as a result of potential interactions with environmental vectors”</i> <p>Should this land be zoned as residential (phase 1 or 2) then it must be of an exceptional quality and ensure there are no impacts on the environmental components listed below. It is not clear how this zoning achieves the core strategy vision and objective for compact growth because there are no obvious access points for the zoned land to be within 15 minutes walk of the services and education facilities in Oranmore. It would be certain to result in an unacceptable increase in traffic either through Oranhill or on the Maree Road.</p>
Monitoring of the previous plan		<p>There are no monitoring reports available related to section 9 and each row of table 9a of the Oranmore LAP 2012-2022 SEA environmental report. This reduces the confidence the public can have that the planning policies and objectives in the new draft CDP and Metropolitan Area Strategic Plan will be implemented and enforced to ensure sustainable development.</p>

Appendix 9: Environmental Reports – Natura Impact Report

Paragraph	Policy Objective	Submission
Table 3.1 Screening of European Sites, Table 4.1 Characterisation of Potential Effects arising from the Plan		<p>The current conservation status of Natura 2000 sites has not been documented in the AA Screening or NIR reports. For many of the Natura 2000 sites there is no site-specific management plan (specifically, Creganna Marsh SPA, Inner Galway Bay SPA, and Galway Bay Complex SAC). Ireland's reporting under art.17 of Habitats Directive and art.12 of Birds Directive must be considered in the assessment, particularly in the absence of a Management Plan. This has not been considered in the Appropriate Assessment Screening or NIR.</p>

Paragraph	Policy Objective	Submission
		<p>A precautionary approach must be taken for Impacts (without avoidance & mitigation measures) considered significant - when there is insufficient information to quantify / estimate the impact and the site-specific conservation objective data suggests an unfavourable CS and / or a small size population.</p> <p>The County Council, as Competent Authority, must satisfy themselves that the Appropriate Assessment has no lacunae is based upon a precautionary approach. We expect this to be confirmed with evidence to justify the decision.</p>
Section 5 - Mitigation Measures	<p>NHB 1, NHB 2, NHB 3, NHB 4, NHB 5, NHB 6, NHB 7 and NHB 8</p> <p>TWHS 1, TWHS 2 and TWHS 3</p>	<p>In the absence of any details on whether habitats or species are currently in favourable conservation status, lacunae remain and so it is not possible for the County Council, as Competent Authority to determine whether the mitigation measures proposed are effective.</p> <p>Specifically, we refer to:</p> <p>No direct land take or habitat loss will occur due to the implementation of the plan either within any European sites or any connectivity corridors necessary to support the ecological integrity of the site, due to policy objectives such as: NHB 1, NHB 2, NHB 3, NHB 4, NHB 5, NHB 6, NHB 7 and NHB 8.</p> <p>Protection against the removal of hedgerows is provided for in the plan via policies such as: TWHS 1, TWHS 2 and TWHS 3.</p> <p>The mitigation measure is well intended, but there is no evidence to demonstrate how these policy objectives and policies will be effective in ensuring no significant adverse effect.</p> <p>The Natura Impact Report (NIR) therefore does not demonstrate that the mitigation measures would be effective in avoiding or reducing impacts</p>
Section 5 - Mitigation Measures	NHB 5	<p>If policy objectives are to be used as mitigation, they need to be fully detailed with no lacunae in the information documented to demonstrate their effectiveness in avoiding or reducing impacts to site specific conservation objectives.</p> <p>There is no information in the NIS to give sufficient confidence that the policy NHB 5 to “support the protection and enhancement..” will have the desired effect? Specifically, there is no detail on how the ecological network is defined or mapped. I am not aware of any mapping that can be used as the baseline to confirm ecological corridors in the context of Article 10. It is therefore critical that the NIR document explains in detail how the public or the Competent Authority can be confident that the core strategy, and individual planning applications will not adversely affect ecological connectivity and corridors.</p> <p>NHB 5 Ecological Connectivity and Corridors. Support the protection and enhancement of biodiversity and ecological connectivity in non-designated sites, including woodlands, trees, hedgerows, semi-natural grasslands, rivers, streams, natural springs, wetlands, stonewalls, geological and geo-morphological systems, other landscape features and associated wildlife areas where these form part of the ecological network and/or may be considered as ecological corridors in the context of Article 10 of the Habitats Directive.</p>
Section 5 – Mitigation Measures	All	<p>There is insufficient assessment of the material alterations in the NIR that the SEA Environment Report identifies significant adverse effects. There is therefore lacunae in the NIR through the lack of assessment and if necessary lack of mitigation measures to avoid or reduce effects.</p>

Paragraph	Policy Objective	Submission
General Impact of the Core Strategy as a whole		There is no clear assessment of the core strategy as a whole, and the avoidance of impacts is entirely reliant upon the implementation of the County Development Plan policies. There are no details on how these policies will be implemented or enforced to avoid or reduce impacts so that favourable conservation status can be achieved.

Appendix 9: Environmental Reports – Strategic Flood Risk Assessment

Paragraph	Policy Objective	Submission
Various	Various	<p>We refer to comments made throughout this document which relate to flood hazard and risk. The most critical issue is that the plan does not make any consideration of assessment of:</p> <ul style="list-style-type: none"> • Safe access and egress from existing and proposed development. • Climate change flood zones.

We look forward to seeing a revised County Development Plan which contains specific strategic commitments and deliverables, as well as timeframes for development of infrastructure and amenities, which are supportive of the social, transport, economic, environmental, cultural and recreational needs of users in Oranmore, Maree, Garraun, and surrounding areas.

Yours sincerely

MÓR Action community group

(Aonghus Kelly, Caroline Rowan, Eoin Butler, Heather Finn, Jacqueline McCarthy, Leonie Finn, Liam Frawley, Niamh Doyle, Noreen Armstrong, Richard Burke, Seamus Diskin, Sean McInerney, Suzi Ryan, Tom Sampson)