

## Comments on the Draft Galway County Development Plan 2022-28

Mark Green - 30/7/21

I would commend the planning team and other organisations for the immense amount of work and thought which has gone into the draft CDP to date. I have the following comments on elements of the various documents and appendices.

### **LARES (appendix 1)**

**Bio-energy** - The use of animal waste products e.g. slurry, for biomass should not be encouraged as this incentivises the further intensification of animal agriculture which is detrimental to animal welfare, biodiversity, CO2 emissions and both animal and human health.

LARES Policy Objective 21 Commercial Bioenergy - All bioenergy facilities should also be assessed against their impact on biodiversity, animal welfare and CO2 reduction requirements.

Rather than encouraging the use of land to grow biomass, preference should be given, where appropriate, to organic horticulture.

**Micro-renewables**, particularly solar, hydro and heat pumps, should be actively encouraged through the planning process by minimising planning constraints, educating and enabling individuals and communities to implement projects, and collaborating with other stakeholders to provide a one-stop shop.

**Marine renewables** - The national marine planning framework was launched on 1<sup>st</sup> July 2021. Will the LARES be revised in light of this?

### **Housing Strategy (appendix 2)**

**Sustainability** – The very high level of one-off housing in county Galway (Housing Strategy & HNDA 6.2) is not sustainable and must be restricted. One-off rural houses outside villages only in exceptional circumstances. Majority of development in designated towns and villages with water/wastewater infrastructure (as per NPF 2040, National strategic outcome 1). Ensure other infrastructure in place (education, medical, retail, communications, public transport etc) to make these attractive places to live. Incentivise development/reuse of central vacant/derelict/unused sites and CPO if required for affordable/social/co-ownership housing.

In assessing a one-off housing strategy the plan should make a projection for the carrying capacity of additional dispersed one-off housing in the countryside in undermining sustainable settlement strategy, undermining of service basis of smaller towns and villages, traffic generation and exacerbation of car dependence, susceptibility to electricity failures, undermining of sustainable travel, service cost to society at large including implication of supporting an aging population, impact on biodiversity, water quality and on landscape.

In respect to sustainable and one-off housing, I refer to An Taisce's submission to the Pre-Draft Consultation, Northern and Western Regional Spatial and Economic Strategy in 2018:-

"The decline that has occurred in many Irish towns has been caused in part by the building of one off houses in the open countryside. Serviced Sites should be made available. Land in serviced settlements, could be purchased either directly by local authorities or via private initiatives. Individual plots would then be sold at a reasonable cost to people who wish to build their own dwelling, subject to certain design parameters. Such an initiative would provide the advantages of a one-off dwelling but in a serviced location, that supports the development of nucleated, walkable communities. A Serviced Sites Initiative must be buttressed by corresponding planning and fiscal policies that fully remove the current hidden subsidies and perverse incentives towards self-building in unserved, isolated locations. A core RSES objective should be that no new housing development shall be permissible which is greater than 15-minute walking distance from basic services and infrastructure. This simple principle, rigorously enforced, is possible and would go furthest in achieving the objectives of smart, compact growth and in regenerating our rural towns and villages."

**Residential zoning** phases 1 and 2. Where Residential (Phase 1) land looks like not being developed during the plan, the option to CPO land should be available to the council.

Urban design guides 2009 & 2013 – are these the most appropriate design guidance for small villages?

**Vacant homes** action plan 2018-21. No vacant sites or derelict sites on register. No action over the 3 year plan in this context. Specific targets for 22-28?

### **Transport strategy (appendix 3)**

Conversion of local authority fleet to electric. Provision of charging points by GCC.

Provision of very light rail or dedicated bendy bus corridor (as in Belfast) across Galway city prioritised over private vehicle-led ring road.

Real-time service information and flexible (e.g. mobility as a service) public transport options for rural areas to encourage modal shift.

Park & Ride must be very high frequency to encourage people to switch from private vehicles.

Walking & cycling strategy targets. Need to be broken down to measure progress against targets at stages e.g. 2024, 2026 and revise actions as required.

Corridor 13 – Galway-Oranmore-N67. A more frequent bus service from Kinvara and beyond to Galway would encourage modal switch from cars.

Road safety in Clarinbridge. Post-M18 opening funding from TII was withdrawn due to community rejection of a poorly designed and presented scheme with no local input. A plan involving all stakeholders with a holistic approach covering safety, walking/cycling, greenways, sustainable transport and village enhancement is needed.

Transport corridor Athenry – Ardrahan. Due to a lack of wastewater infrastructure Craughwell and Ardrahan are not included as small growth villages although otherwise ideal targets for this given their sustainable transport links. Representations need to be made to Irish Water to include treatment plants for these locations in their medium term plans.

### **Landscape character assessment (appendix 4)**

**Coastal landscape** includes inner Galway bay and south side of Galway bay, which are limestone and different in character to Connemara granite coastal. This is completely ignored in the landscape type summary (p33) which categorises all as granite shoreline.

**Views** – recommend view west from Clarinbridge pier, looking at Dunbulcan bay and toward Galway bay.

### **Design guidelines for single rural house (appendix 5)**

Planning context (P7) references 2003-9 CDP.

Place making (P11) – last item – add “Avoid” at start of para.

Capture the Sun (P13) – update to include consideration of solar panel optimisation.

It is to be welcomed that placemaking, energy sustainability, topography, landscaping, biodiversity and the natural environment finally take precedence over the urban-led “building line” concept and the roads-led removal of front walls and hedges. This approach needs to be consistent across all rural, including, where appropriate, small village, planning and therefore needs to be continually monitored. How will suburban building forms be consistently rejected in favour of rural forms (p29-30)?

Dormers (p43) – in addition to the design reasons outlined, are generally incompatible with NZEB standards as very hard to properly insulate. The design guidelines should be updated to cover current and future energy standards.

Trees and shrubs (p51) – should be rewritten in light of primacy of biodiversity and associated ideas e.g. rewilding.

## **SFRA**

OPW 2009 guidelines will be almost 20 years old by the end of the plan period. Allowance should be made for a re-assessment of the plan if updated data and guidance become available, including at Stage 3 planning application where the implementation of flood relief schemes have changed the flood risk level.

## **Written Statement (volume 1)**

**Climate change** – the implications of climate change should be explicitly considered in each chapter of the development plan (volume 1, written statement).

**Remote working** – the impact of the likely permanent increase in the role of remote/home working needs to be assessed and planned for in each relevant part of the plan e.g. housing, transport, retail.

**Biodiversity** – Given the council's declaration of a biodiversity loss emergency, and in addition to the SEA Environment Report and AA NIR, the plan should address the goal of increasing biodiversity in every area of the plan and at every stage of development and at all development scales. The county council and associated bodies should use every tool available to approach biodiversity in a holistic way and encourage and incentivise stakeholders to proactively do the same e.g. changing roadside and open areas maintenance regimes, support organic agriculture and rewilding projects, cut insecticide/herbicide use, pollinator planting, planning conditions (planting & maintenance), air & water quality considerations etc.

**Environmental Justice** – this principle should be incorporated into the plan

**Marine planning** – the National Marine planning framework is currently at draft stage. Allowance should be made to incorporate into the plan, any issues not already addressed, when this framework is finalised.

**Drainage** - The preferred use of innovative SUDS drainage methodologies for biodiversity enhancement should be incorporated into planning requirements.

## **MASP (volume 2)**

The Greater Galway Area Drainage study is critical to the MASP which may therefore need revision when this is complete. I would question the assumption that wastewater capacity is sufficient to 2028, and especially that it is sufficient to avoid raw discharges to watercourses/the sea in high rainfall events which are becoming increasingly frequent.

A growth of urban generated development in the MASP hinterland must be avoided since this runs counter to the compact "10 minute" community.

Claregalway – is there a proposal for a cycling/walking route to Galway city?

Oranmore – The Oranmore to Barna greenway proposal is welcome. Oranmore has a number of vacant/derelict sites in the centre. A traffic management solution is also required, preferably one that removes vehicles largely from sections of the main street (admittedly difficult while the petrol station is in its current location).

The Briarhill and, in particular, Garraun Urban Framework plans would appear to be useful templates for future similar plans.