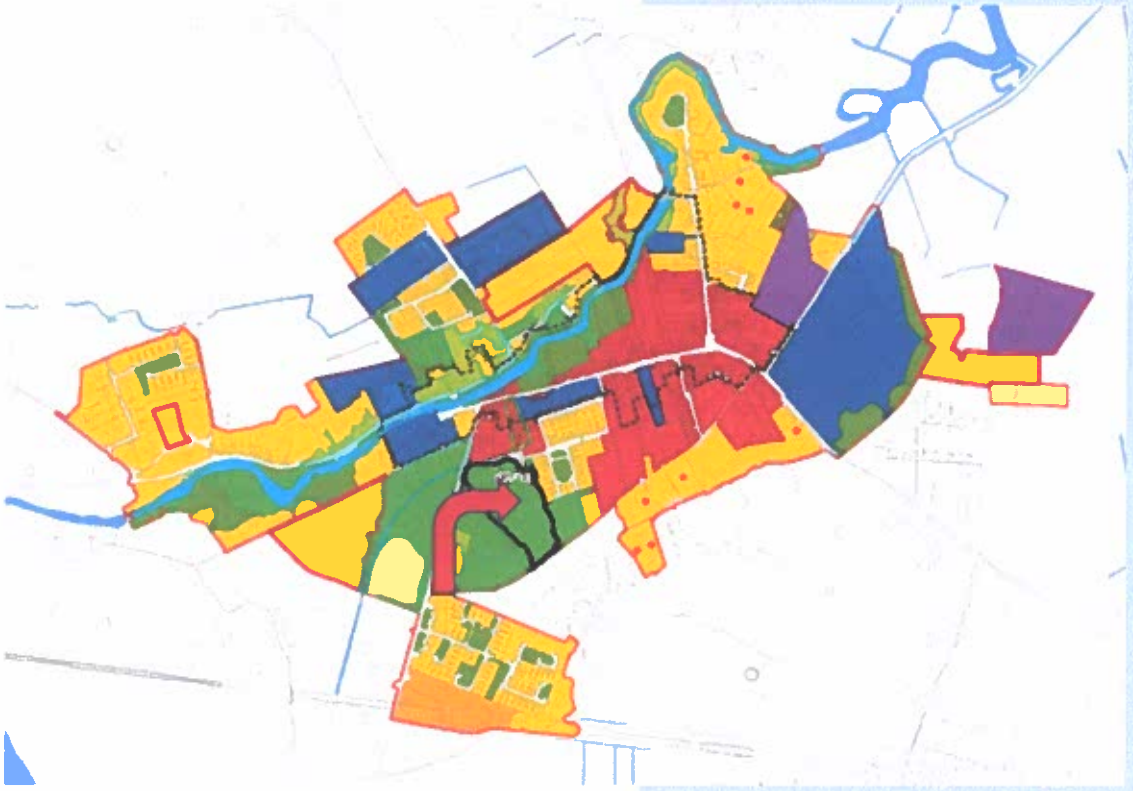
July 2021

Please find enclosed Submission for GCC Co. Dev. Plan 2022-28 for Galway

Yours
Carmel Geoghegan

Redacted personal information

Galway Development Plan Submission 2022-2028
Small Growth Town - Oughterard



Lands at Station Road, Cregg, Oughterard, Co. Galway

Submitted by Joan, Deirdre and Carmel Geoghegan.

Executive Summary

- This submission is being made by Joan, Carmel and Deirdre Geoghegan and is submitted to Galway County Council in the context of the Draft Galway County Development Plan 2022-2028, which is currently being reviewed.

- We own 5.45 acres of lands at Station Road, Cregg, Oughterard, Co. Galway. Under the current Oughterard Local Area Plan 2006-2012, the lands are zoned Residential. (Red arrow on cover page indicating the parcel of land referred to).

- It is proposed to rezone the subject land to Open Space/Recreation & Amenity under the Galway County Development Plan 2022-2028.

- We are seeking to have zoning on this land retained as Residential.

- Consultant Engineering Hydrologist Savithri Senaratne has prepared a report on her findings of the lands, in relation to flood risk and recommends changing the proposed zoning to Zone C, provided that part of the land is maintained as a flood plain and compensatory area. see Appendix 1.

- The lands are serviced directly by public water mains, electricity and telecom. The public foul water scheme is located on the Station Road which runs parallel with entrance to the lands.

- Retaining the current zoning of Residential would provide much needed family homes to the town including social and affordable housing.

- These homes would help with the growth of the town through essential services and retail/business outlets in the immediate area.

Contents

Introduction

Joan, Carmel and Deirdre Geoghegan are the registered owners of approximately 5.45 acres of land at Station Road, Cregg, Oughterard, Co. Galway which has been owned by the Geoghegan Family for over 30 years. These lands have been proposed to be re-zoned Open Space/Recreation & Amenity in the Draft of the Galway Development Plan 2022-2028. We are proposing to retain the current zoning of Residential as zoned in the current Oughterard Local Area Plan 2006-2012.

This submission is being made within the specific timeframe of submissions set out by the Draft Galway Development Plan webpage – 30th July, 2021 @ 4.30 pm

Site Location and Description

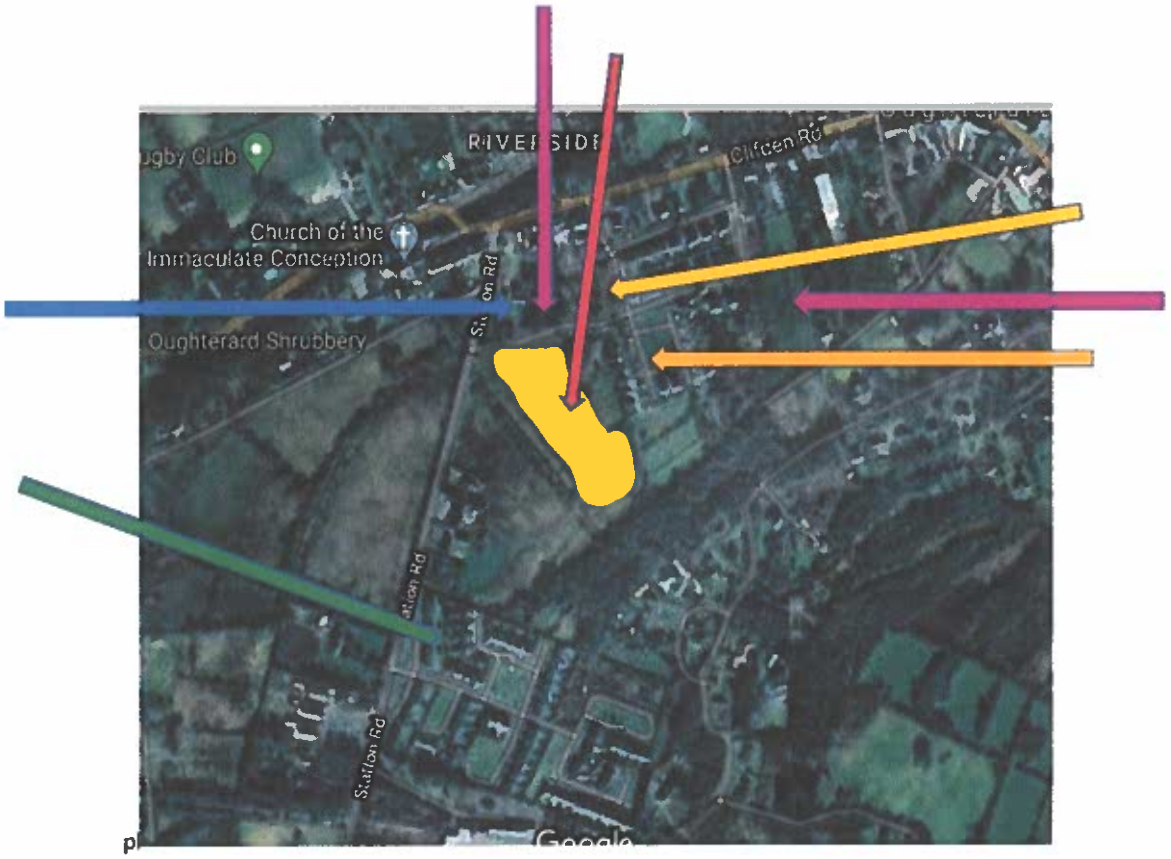
The subject lands of 5.45 acres are located on the Station Road and approximately 100 metres from the N59 Galway – Clifden road. The lands are zoned Residential in the current Oughterard Local Area Plan 2006-2012. The land is bordered on two sides by residential estates. Cregg View to the East & apartment complex Canrower Court to the North along with the "Opportunity site" Corrib Hotel. These estates are of similiar ground level which is identified on the contour map of the Flood Risk Assessment (Senaratne 2021). To the southern border of the subject lands, there is grazing land.

Cregg na Coille housing estate is approximately 200 metres further along the Station Road. The subject land enjoys proximity to the town centre which is within a 5 minute walk. The Catholic Church is 2 minutes and both National/Secondary schools are within 5/7 minute's walk. The land has excellent connectivity to the amenities and facilities of the town centre of Oughterard. A small corner shop and café are also adjacent.

Two recent nearby developments have been granted Planning Permission by Galway County Council, References 201298 for 22 dwellings and 21466 for 4 dwellings. These sites are of the similar ground level as the other developments in the adjoining estates.

There are no natural or built heritage designations on the subject lands.

See Google Maps Satellite View, lands filled in Yellow showing adjacent residential estates and recently 2021 granted housing permission estates. Figure 1.



Red Proposed Land on Station Road filled in Yellow

Orange Cregg View Housing Estate

Yellow Corrib Hotel (Opportunity Site)

Blue Canrawer Court Appartments

Green Cregg na Coille

Purple Lands approved for planning permission in 2021 Ref. 201298 & 21466 (same level ground)

Figure 1. Nearby Estates and Apartments.

National Planning Framework

National Planning Context Project Ireland 2040: National Planning Framework

The National Planning Framework (NPF) is *"the Governments high-level strategic plan for shaping the future growth and development of our country out to the year 2040"*. It is a Framework to guide public and private investment, to create and promote opportunities for our people, and to protect and enhance our environment- from our villages to our cities and everything in between.

It is stated within the National Planning Framework that *"a major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages"*. The NPF seeks to target 50% of population growth to outside of the country's five main cities (above 50,000 population) and to consolidate such growth into Ireland's large towns, villages and rural areas and therefore the subject lands, being within the Oughterard catchment, would be consistent with this aim.

The NPF states that *"the long-term vision for Ireland's housing future aims to balance the provision of good quality housing that meets the needs of a diverse population, in a way that makes our cities, towns, villages and rural areas good places to live now and in the future."* It is outlined within the Plan that future homes are required to be located where people have the best opportunities to access a high standard quality of life.

In Ireland, the location of housing has taken on a dispersed and fragmented character which has led to people living further away from their jobs and often being at a sizeable remove from important services such as education and healthcare. It is stated that it is important to *"prioritise the location of new housing provision in existing settlements as a means to maximising a better quality of life for people through accessing services, ensuring a more efficient use of land and allowing for greater integration with existing infrastructure"*.

The overarching emphasis of the NPF is on renewing and developing existing settlements, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages.

In this regard, the NPF sets a target for at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages on infill

and/or brownfield sites. The provision of a residential development on the subject site in this instance will therefore be in accordance with the NPF's target of 40% of new housing to be located within existing towns and for 50% of population growth to take place within Ireland's existing settlements, outside of the five larger cities (i.e. Dublin, Cork, Limerick, Waterford, Galway). Development Plan Submission Draft Galway County Development Plan 2022-2028

The NPF is to ensure that the targeted population growth of Ireland's small towns and rural areas to 2040 is proportionate, at a targeted average rate of 15% for small towns of less than 10,000 people and rural areas in each Regional Assembly area, to be applied regionally through the Regional Spatial and Economic Strategy process and locally through County Development Plans.

The aforementioned site is within town boundary has been residential zoned since 2004.

Rebuilding Ireland, An Action Plan for Housing and Homelessness (2016)

Rebuilding Ireland, an Action Plan for Housing and Homelessness, provides a multi-stranded, action oriented approach to achieving many of the Government's key housing objectives.

The overarching aim of the Plan is to ramp up delivery of housing from its current undersupply across all tenures to help individuals and families meet their housing needs, and to help those who are currently housed to remain in their homes or be provided with appropriate options of alternative accommodation especially those families in emergency accommodation.

The Action Plan comprises of 5 key pillars which are addressing homelessness, accelerating social housing, building more homes, improving the rental sector and utilising existing housing.

The Action Plan sets ambitious targets to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021, while at the same time making the best use of the existing housing stock and laying the foundations for a more vibrant and responsive private rented sector.

Achieving the aim of accelerated delivery will contribute to the following core objectives:

- Addressing the unacceptable level of households, particularly families, in emergency accommodation.

- Moderating rental and purchase price inflation, particularly in urban areas.

- Addressing a growing affordability gap for many households wishing to purchase their own homes.

- Maturing the rental sector so that tenants see it as one that offers security, quality and choice of tenure in the right locations and providers see it as one they can invest in with certainty.

- Ensuring housing's contribution to the national economy is steady and supportive of sustainable economic growth.

- Delivering housing in a way that meets current needs while contributing to wider objectives such as the need to support sustainable urban and rural development and communities and maximise the contribution of the built environment to addressing climate change. (Rebuilding Ireland, 2016)

The return of the existing zoning for the subject lands to provide for residential development, on lands that are contiguous to existing residential schemes will help the Government to achieve the objectives of the Housing Action Plan.

Thus, it is submitted that the proposal is consistent with the policy in this regard.

Justification and Grounds of Submission

This submission proposes to keep the subject lands zoned as Residential, this is in keeping with the residential estates in the vicinity and with the current Oughterard Local Area Plan (OLAP).

The subject lands are:

1. Within the town boundaries and are presently zoned Residential under the provisions of the 2006-2012 Oughterard Local Area Plan.
2. Are serviceable and accessible.
3. Have connectivity to the town centre.
4. Are without any natural, heritage designations. Flood Risk report included in response to the FRM map of Galway County Council showing lands are capable of withstanding potential flood events.
5. Within a town that is identified as having an important role as a satellite town of Galway City. (GCC OLAP 2006-2012)

Services and Infrastructure of the Lands

The lands are serviced by public water supply, electricity, telecom and the upgraded public sewage service runs along the Station Road. The lands are directly accessible from Station road with road frontage.

Transport and Movement

Part of the lands are bordered by a public footpath and lighting to facilitate the safe movement of pedestrians. This will "encourage and promote the reduction of reliance of the private car." Public transport is within 5 minute's walk from the land.

Flood Zoning

The basis of the Council's proposal to rezone the lands to Open Space/Recreation & Amenity is that it is believed that the lands are liable to flooding as indicated on the Flood Risk Management Map indicative zone A.

Consultant Engineering Hydrologist Savithri Senaratne has concluded that relevant flooding mechanism is pluvial flooding. The catchment area at the subject lands is small, resulting in small pluvial flood volume. The proposed zoning of the land is recommended to be changed, provided that part of the land is maintained as a flood plain and a compensatory area. Full report in Appendix 1

We look forward to a favourable consideration of this submission by Galway County Council and if clarification or further information is needed please let us know.

Contacts:

Deirdre Geoghegan Redacted Personal info

Redacted Personal info.

Carmel Geoghegan Redacted Personal info l.com

Redacted Personal information

Joan Geoghegan Redacted personal info

Redacted personal information Co. Galway

References:

Galway County Council. "Oughterard Local Area Plan 2006-2012" http://www.galway.ie/en/services/planning/planspolicy/archives/laparchives/oughterardlap/ [accessed 29/07/2021].

Government Publication. "Rebuilding Ireland Action Plan for Housing and Homelessness, 2016. Available from: https://rebuildingireland.ie/wp-content/uploads/2016/07/Rebuilding-Ireland_Action-Plan.pdf [accessed 27 August 2021].

Government Publication. "National Planning Framework Project Ireland 2040, 2018. Available from: https://npf.ie/ [accessed 27 August 2021]

Senaratne, Savithri, 2021, "Flood Risk Assessment for the Property at Cregg, Oughterard, Co. Galway."

Appendix

Flood Risk Report

FLOOD RISK ASSESSMENT

FOR THE PROPERTY

AT CREGG, OUGHTERARD, CO, GALWAY

Savithri Senaratne

B. Sc.(Engineering), MICE(Lond), C.Eng.,
M.Sc. (Hydrology), Ph. D.(Hydrology)

Consultant Engineering Hydrologist

July 2021

Hydro-S,
Kilcolgan,
Co Galway
www.hydros.ie

Mob: 086 1738119
Email : info@hydros.ie

FLOOD RISK OF THE PROPERTY AT CREGG, OUGHTERARD, CO. GALWAY.

Introduction

The subject site is at Cregg, Oughterard, Co. Galway and the location is as shown on Figure 1.

Figure 1: Subject site shown on a OSI street map

This site is located to the South of Main Street (N59, Galway – Clifden - Leenane road) and West of L1311, Oughterard – Cregg local road. The North boundary of the site is bordering a private road off from L1311 and the site entrance is from L1311. The subject property is within Oughterard town limits. River Owenriff is to the North of the subject site, flowing in a West to East direction meandering further downstream. A drainage canal is crossing the subject site in the South part and on the West boundary. Surface water features at the vicinity of the subject site are shown on Figure 2.

Scope of the study

To examine the relevant flood mechanism/s on the subject site and to arrive at the flood zones as defined in the Planning Systems and Flood Risk Management guidelines (OPW, 2009).

Flood Background

The flood hazard maps of OPW (floodinfo.ie) show the areas that experience recurrent or had a single flood event. An extract of the flood maps is as shown on Figure 2 for the general area of the subject site.

Figure 2: Extract of the floodmap at the vicinity of the site (source: www.floodinfo.ie)

There are 3 locations shown on Figure 2 that are subject to recurrent flooding. They are,

Location 1- On subject site and the area engineer's report states "low lying land floods every year after heavy rain".

Location 2 – To North-West of the subject site (near the church on road N59): "Owenriff river over flows its banks approximately every 3 years after extremely heavy rain".

Location 3– To further North-West of subject site - "Stream overflows its banks approximately every 2 years after extremely heavy rain. Recent development has taken place in the area and has exacerbated the issue"

Location2 and 3 do not affect flood risk at subject site and flood risk on Location 1 is further examined in the present report.

Data and other studies

Flood risk is examined in detail in recent studies. Preliminary Flood Risk Assessment (PFRA) was completed by OPW in July 2011. PFRA was done by a review of historical flood risk, an assessment of predictive flood risk and a consultation with local authorities. Based on these information PFRA maps were produced. However, it is advised that these maps are used only as an indication of relevant flood mechanism. Pluvial flood locations are identified only in these PFRA maps and are not revised in the recent maps. Fluvial flood risk maps are revised and the groundwater flood risk maps are also revised from the 2011 maps. The original pluvial flood risk locations are included in Appendix II page 98 (draft strategic flood risk assessment, Galway county Development Plan, 2022 – 2028), copied as Figure 3.

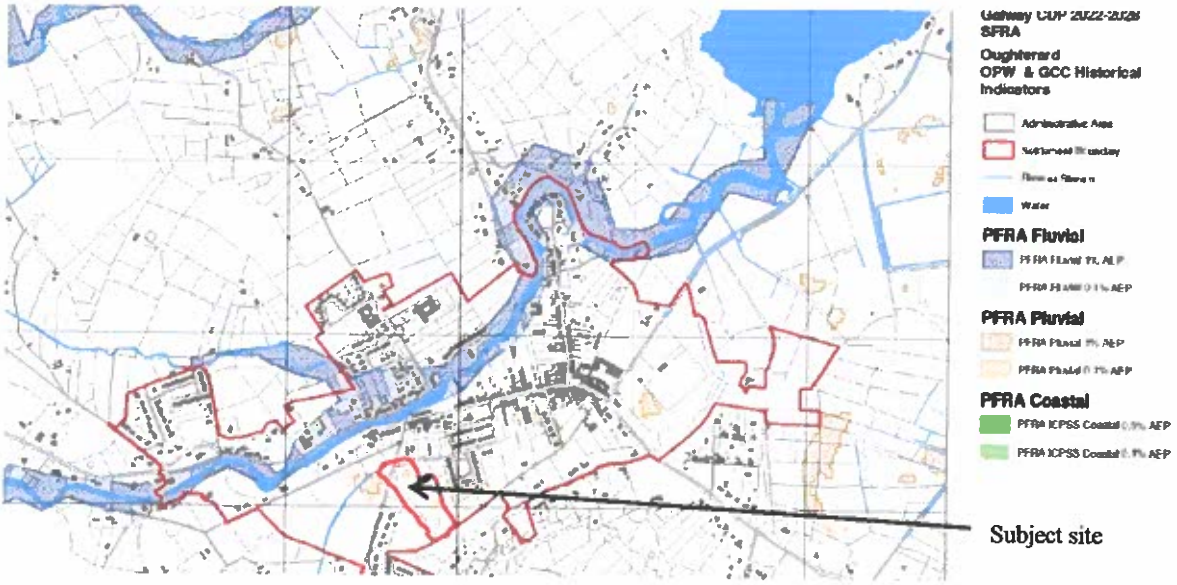


Figure 3: A copy of the draft PFRA maps showing the vicinity of the proposed site (source: strategic flood risk assessment, Draft Galway County Development Plan 2022 - 2028)

The pluvial flood locations are on the subject site as shown on Figure 3. Therefore pluvial flooding is the relevant flood mechanism at the subject site.

The flood risk zones as per the draft strategic flood risk assessment for Oughterard is as shown on Figure 4 for the general area of the subject property.

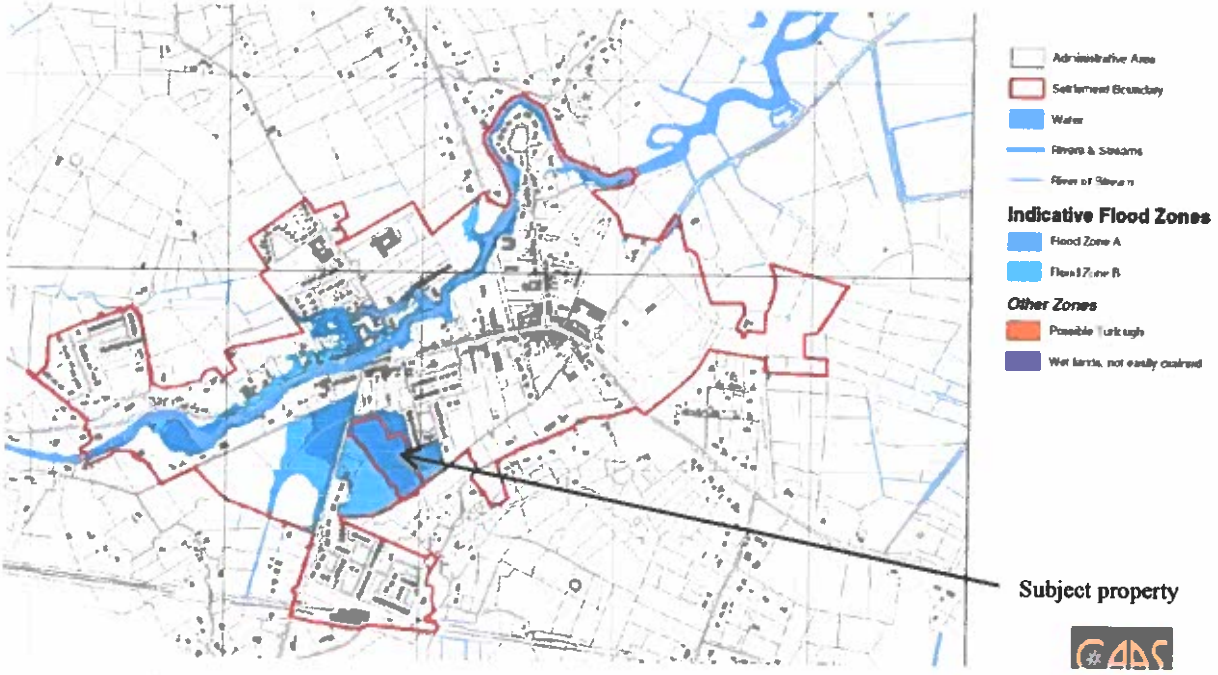


Figure 4: The flood zone map (source: strategic flood risk assessment, Draft Galway County Development Plan 2022 - 2028)

The entire site is within flood zone A as was in the previous plan based on the pluvial flood risk areas and the benefitted land map.

Drains maintained by OPW are on the South part of the subject site and on the West boundary of the subject site and are identified as CH9/1 for drainage purposes by OPW.

This drain flooded during 1999 flood event flooding the apartments to the East of subject site. These apartments have not flooded since then and not during the 2009 flood event or 2015 flood event as a surface drainage solution was implemented with an attenuation tank.

The main flood mechanism is surface runoff and pluvial flooding is the relevant flood mechanism.

Pluvial flood risk

The method described in flood studies supplementary report, FSSR 16, is used in estimating the Design flood volume. This is given by equation 1.

$$Runoff\ volume = PR \times Catchment\ area \times Rainfall\ depth \qquad \textbf{Equation 1}$$

The relevant quantities in Equation 1 are calculated using Equation 2 and other information given below.

$$PR = SPR + DPR_{CWI} + DPR_{RAIN} \qquad \textbf{Equation 2}$$

Where,

$$SPR = 10\,S_1 + 30\,S_2 + 37\,S_3 + 47\,S_4 + 53\,S_5$$

S_1 to S_5 are the catchment fractions covered by the five winter rainfall acceptance potential classes. However, Carlow County Council SUDS policy document (Carlow County Council, 2008) demarcates 5 types of soils depending on the drainage and assigns a value for SPR. This is used in the present study.

$DPR_{CWI} - 0.25(CWI - 125)$

CWI – Catchment wetness index

$DPR_{RAIN} - 0.45(R - 40)^{0.7}$ for storm depth $R > 40$ mm and is zero for $R < 40$ mm.

Using a rainfall depth for a storm of 100 year return period and 6hr duration the estimated runoff is for a return period of 100 years.

The location identified as a low-lying area is as shown on Figure 5 with the catchment area drawn on a contour map. DTM data from Ordnance Survey Ireland are used with the imagery map from World Imagery and contours are generated by GIS software.

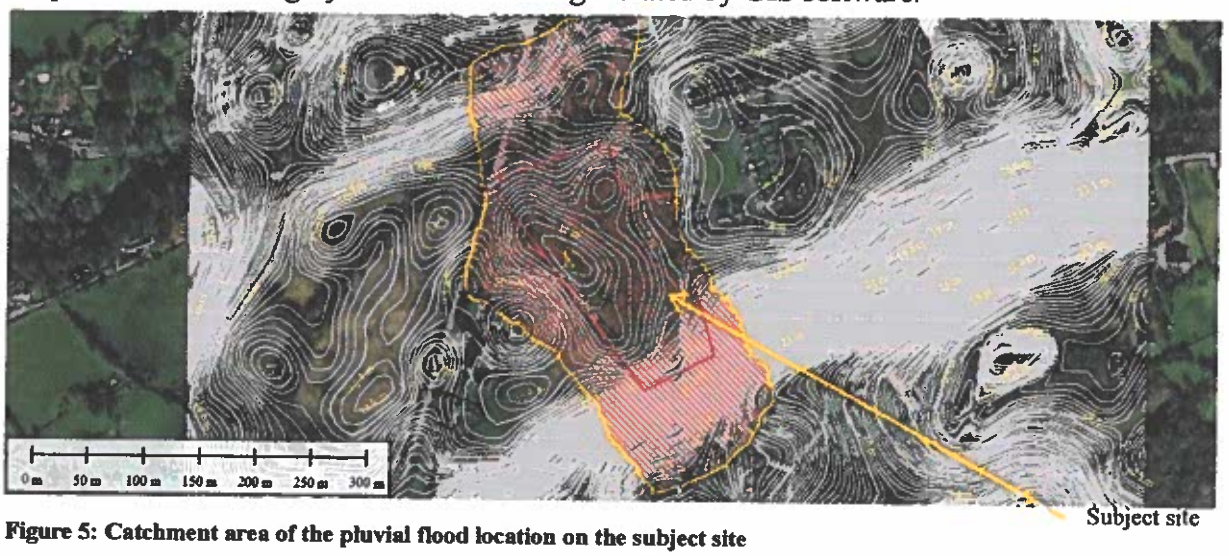


Figure 5: Catchment area of the pluvial flood location on the subject site

Catchment area = 0.0661 sq.km.

Design flood volume is calculated using FSSR 16 method described in Section 3.1. The SPR value is taken as 30 (equals 0.30x100), DPR_{RAIN} is estimated as below and the catchment wetness index is assumed as 1.

Storm depth = 64.4 (6hr 100 year rainfall)

DPR_{RAIN} = 4.21 mm

Percentage Runoff = 30 + 4.21 + 4.01 = 38.22%

Therefore the percentage runoff is 38.22 %

The design runoff volume is estimated using Equation 2. Catchment area is 11.17 ha and the rainfall depth of 6 hr 100 year rainfall is 64.4 mm.

Therefore the design flood volume = 1657 m^3.

Design flood volume with climate allowance of 20% = 1952 m^3.

Discussion

In this section the flood levels and the site levels are compared to examine the risk of flooding. The flood mechanism that is discussed in this section is pluvial flooding as it is the most relevant flood mechanism.

Pluvial flood volume is estimated in the previous Section as 1657 m^3 and 1952 m^3 when climate change is accounted. The low lying area X is on subject property and the lowest level of the subject property is at 11.7 m is the lowest level on area X. The smaller areas that are lower than general ground are connected by small drains to the main CH9/1 drain. The CH9/1 drain has high bank levels, probably resulting from clearing during maintenance works. The analysis is carried out to estimate the pluvial flood volume assuming CH9/1 drain is not present. Therefore, the flood volume is retained on the subject site along the South boundary and West boundary allowing a 10 m berm at 11.8 m AOD (shown hatched on Figure 6). This will allow rest of the subject site to be left in flood zone C.

Figure 6: flood risk zones

The area marked on Figure 6 allows a 10 m wide berm as a flood plain for the drain and the area between the South boundary and the drain is compensatory storage to be maintained at the same level (10.8 m AOD). Therefore, rest of the subject site is no longer in flood zone A or flood zone B as shown on Figure 4.

Conclusions

The objectives of the present study as given on the scope of study are as follows:

1. To examine the relevant flood mechanism/s on the subject site.
2. To arrive at the flood zones as defined in Planning Systems and Flood Risk Management guidelines (OPW, 2009).

The subject site is fully on flood zone A as shown on the flood zone map of the draft strategic flood risk assessment on the draft Galway County Development Plan 2022 – 2028 (Figure

4). The relevant flood mechanism is pluvial flooding. This is arrived from the pluvial flood risk areas as per PFRA mapping of 2011.

The catchment area at this location is small resulting a small pluvial flood volume. The pluvial flood volume is estimated assuming the drains are not present. Therefore, this flood volume could be accommodated within the subject site by allowing a 10 m wide berm as a flood plain on the right bank (Figure 6) of the drain at 10.8 m AOD. Moreover, the area between the drain and the South boundary as shown on Figure 6 at 10.8 m AOD will provide compensatory storage for developments in the rest of the site. This proposal will have a positive effect on other property as the pluvial flood volume is accommodate within the subject site

The zoning of the subject site is recommended to be changed provided the area shown hatched on Figure 6 is maintained as a flood plain and a compensatory area.

Prepared By,

Savithri Senaratne

B. Sc.(Engineering), MICE(Lond), C.Eng.,
M.Sc. (Hydrology), Ph. D.(Hydrology)

Consultant Engineering Hydrologist

July 2021

Hughes Planning & Development Consultants
85 Merrion Square, Dublin 2
+353 (0)1 539 0710 – info@hpdc.ie

Draft Galway County Development Plan 2022-2028 - Oughterard Zoning Map

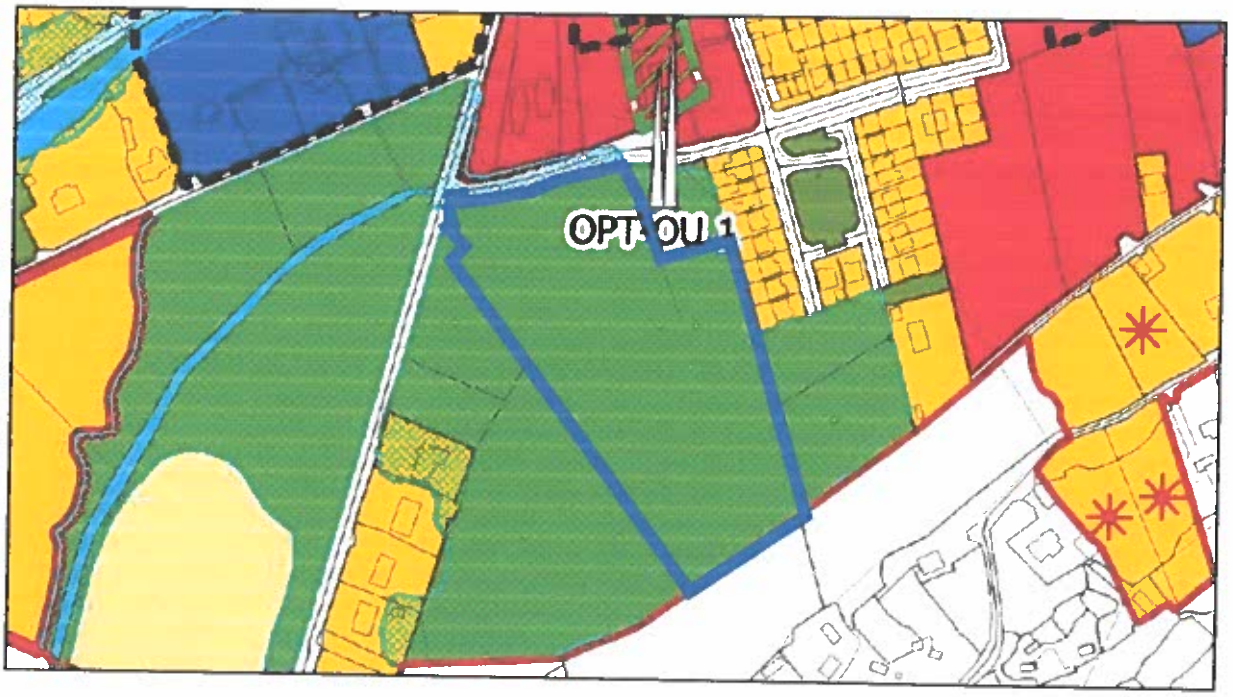


Figure 1.0 Subject site under 'Open Space/Recreation & Amenity' with 'Constrained Land Use' zoning (outlined in blue).

Figure 2.0 Aerial view of the subject site.

Hughes Planning & Development Consultants
85 Merrion Square, Dublin 2
+353 (0)1 539 0710 – info@hpdc.ie

Flood Risk Map in the Draft Galway Development Plan 2022-2028

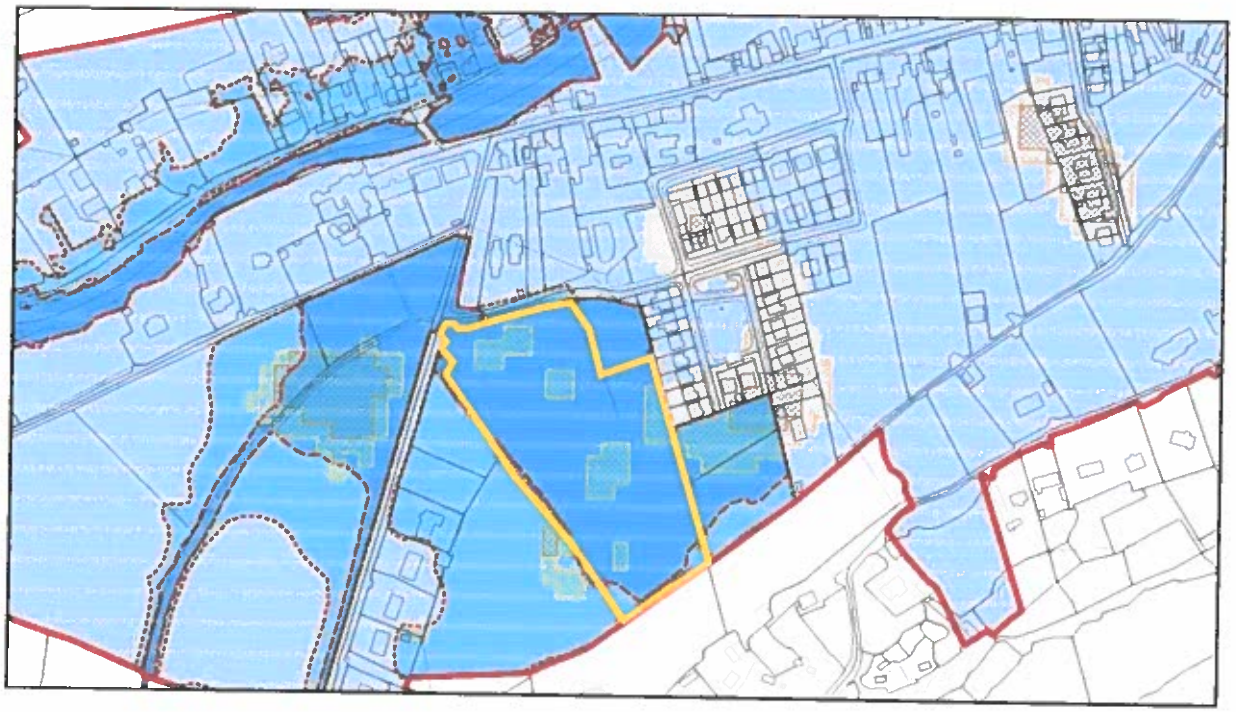


Figure 3.0 Flood risk assessment map.

Subject Site Outlined in yellow within 'Indicative Flood Zone A' -

Preliminary Flood Risk Assessment (PFRA) -