

Our Case Number: ABP-321144-24

Your Reference: Galway County Council



**An
Coimisiún
Pleanála**

MKO
Tuam Road
Galway

H91 VW84,,



Date: 26 August 2025

Re: Proposed development of a public realm scheme in Clifden, County Galway, Townland of Clifden, County Galwy

Enclosed, for **information only**, are two copies of 3 Further Comment Submissions received by the Commission from the following in relation to the above-mentioned proposed development:

1. Edie Moran
2. Harry Joyce
3. Inland Fisheries Ireland

Please ensure that a copy of these submissions is available for public inspection at the offices of the local authority.

If you have any queries in relation to the matter please contact the undersigned officer of the Commission at laps@pleanala.ie

Please quote the above-mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,


Lauren Griffin
Executive Officer
Direct Line: 01-8737244

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Our Case Number: ABP-321144-24



**An
Coimisiún
Pleanála**

**Edie Moran
Beach Road
Clifden
Co. Galway
H 71 PR53**

Date: 08 August 2025

**Re: Proposed development of a public realm scheme in Clifden, County Galway
Townlands of Clifden, County Galway**

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Commission has approved it with or without modifications.

If you have any queries in relation to the matter please contact the undersigned officer of the Commission at laps@pleanala.ie

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Yours faithfully,

**Lauren Griffin
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AA02

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From: edie moran <ediemoran999@gmail.com>

Sent: Thursday, August 7, 2025 10:10 PM

To: LAPS <laps@pleanala.ie>

Subject: Case No: ABP-321144-24

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Proposed development of a public realm scheme in Clifden.

Dear An Coimisiún Pleanála,

The map for Case No: ABP-321144-24 hasn't changed, did not take the objection I submitted into consideration.

I live at the address H71 PR53 which is situated on the Beach road in Clifden.

I wish to express my strong objection to the proposed entrance (note 3 GC1) on the Beach Road. I will no longer have parking space for my car because of the proposed entrance (note 3 GC1) & the proposed position of sculpture (note 13). I and members of my family have resided at this address H71 PR53 since 1979. For the whole of this time I and members of my family have used which is part of folio GY112170F to park cars as there is no parking attached to house, 5 steps up to house H71 PR53. I am currently undergoing cancer treatment and live at this property on my own.

The public road is close to the house H71 PR53 is narrow and there is no way to park on it without obstructing traffic.

The plans for the Harbour Park show that there will be a Sculpture (note 13) at the entrance. Why is it necessary to reposition the sculpture from the town square.

Is it possible to landfill an area to provide a gentle gradient on the pathway near the starting point of the park.

The proposed entrance a parent with a young child walking & a buggy will have to walk part of Beach Road to enter the Harbour Park.

Would you leave your car at a public car park at night.

Why cause distress to another person ?

I object to the proposed entrance (note 3 GC1) and the removal of the existing parking space which I use.

Hoping you will give this your kind consideration.

Yours sincerely,

Edie Moran
Beach Road, Clifden H71 PR53

Yours sincerely,

**Edie Moran
Beach Road, Clifden H71 PR53**

Our Case Number: ABP-321144-24



**An
Coimisiún
Pleanála**

Harry Joyce
Bridewell Lane
Clifden
Co. Galway
H71AW08

Date: 12 August 2025

Re: Proposed development of a public realm scheme in Clifden, County Galway
Townlands of Clifden, County Galway

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Commission has approved it with or without modifications.

If you have any queries in relation to the matter please contact the undersigned officer of the Commission at laps@pleanala.ie

Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Lauren Griffin
Executive Officer
Direct Line: 01-8737244

AA02

AN COIMISIÚN PLEANÁLA
LDG- _____
ACP- _____
08 AUG 2025
Fee: € _____ Type: _____
Time: 9:15 By: RSP21

Harry Joyce
Bridewell Lane,
Clifden,
Co. Galway,
H71 AW08

06 August 2025

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1, D01 V902

Re: Case No ABP-321144-24 Response to Further Information

Dear Sir/Madam,

I wish to respond to the further information provided by MKO to An Coimisiún Pleanála, reference ABP-321144-24 concerning the proposed development of a public realm scheme in Clifden, Co. Galway.

I have previously made an observation on the original application. I agree with the general aims of the proposal and admire a lot of the detailed design. However, there are serious shortcomings in the design, particularly in the town centre part of the Application with a proposal to remove 40% of on-street parking with no alternative provision.

I am concerned that the original application and the supplementary material and changes outlined in the Further Information provided are contrary to the proper planning and sustainable development of the area. The scheme is not in accordance with the objectives of Galway County Development Plan 2022-2028 (GCDP).

The Clifden Local Area Development Plan 2018-2024(LAP) is no longer in effect, but it should have informed the initial design of the proposal and is still valid as a reference for meeting the requirements of good and sustainable planning of the town. The proposal fails to meet the requirements set out in the LAP also.

As stated in my original observation, I draw attention to the shortcomings of the scheme with heavy heart because this scheme represents, arguably, the biggest attempt at improvement since the one-way system was introduced in the town. As a resident within the scheme's boundary and business and property owner within the scheme's boundary I would whole-heartedly agree with a proposal of the same aims providing it met with the requirements of the GCDP, LAP and general good planning. I hoped that there could be some way a variation of the scheme could be implemented but the scheme documented with the application, as amended and informed by the Further Information Submission, falls seriously short.

Restating the main issues from my original observation

Car Parking Reduction

The written summary of the proposed reduction in parking spaces is smaller than the actual reduction shown in the plans and supporting documents, totalling approximately 40% reduction of the existing on-street parking spaces in the town centre. Such a reduction would stifle the commercial viability of the town.

Entrance to Bridewell Lane

The proposal removes large vehicle access to this area that includes residences and

junction does not serve the wider community better but represents a serious loss to those that require its current geometry and is contrary to the proper planning and sustainable development of the area.

Bus-Stop on Market Street

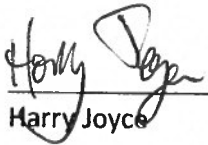
The proposed bus stop location on a slope is impractical and bus drivers seek the flatter part of Market Street for passenger safety. The impracticality is separate from minimum standards set out by the NTA. Such is the scope and scale of this scheme, it is not unreasonable to expect a more ideal relocation of a piece of key transport infrastructure. The existing single bus stop is insufficient for the current bus traffic.

Treatment of path between Bridewell Lane and Ballyconneely Road

The proposal for this path is not fully considered and may contribute to making the current intermittent issue with anti-social behaviour at this location likely a more frequent occurrence.

Please find details in the following pages regarding points raised in the Further Information Submission. Sadly, the more I review the design documents, the more I find problems. I trust that the Commission will consider this observation together with my original observation when deciding on this proposal.

Yours sincerely,


Harry Joyce

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Item 1: Roads and Traffic subitem (i)

The Further Information Request states

Having regard to the Stage 1 Road Safety Audit submitted with the application, it would appear that a number of the recommendations (Problems 2.1.1-2.1.24, 4.1.1-4.1.3, 5.1.1-5.1.2, Observations 1-3) have not been incorporated into the proposed development. You are requested to outline the rationale for same.

The Further Information Submission responds

Appendix 2: Clifden RSA Response Tracker indicates how the current scheme that was submitted to the Board (now Commission) has been updated to resolve the issues that were raised in the Road Safety Audit.

It would appear that, although the Applicant states that issues raised by the Road Safety Audit were incorporated in the scheme, the design documents do not support the assertion that resolution of all the issues have been incorporated. Some issues, flagged as resolved, clearly have not been resolved. My initial assessment of the design documents assumed that due diligence had been carried out regarding road safety. But comparison of the Road Safety Audit recommendations and the Applicant's "Clifden RSA Response Tracker" log indicates the contrary. I wish I had time to assess each of the recommendations and their "resolutions", but I do not, and this should not be responsibility of a member of the general public. I have however highlighted several of the Road Safety Audit recommendations that clearly have not been resolved.

For example, Item 2.1.6 from Appendix 2 in the Further Information Submission describes the issue as "Space to accommodate local traders not shown" and the response is logged as "Footpath widths throughout the scheme have been widened to accommodate greater spill out space and opportunities for local business". This "resolution" does not make sense.

The original finding from the Road Safety Audit stated

The Audit team observed on site a number of local traders are operating within parallel parking areas and offline parking areas on Market Street. The Audit team are concerned the failure to cater for the existing traders may result in the setting up of the stalls in unsuitable locations. This may result in creating hazardous situations for VRU.

The weekly Friday market is a key part of Clifden town life and appropriate space for the stall licence holders is key to their commercial viability. The response in the RSA Response Tracker does not make sense in the wider context of the RSA finding either. Putting aside the response logged in the Tracker, there is no defined allocated space for the local traders on the drawings in the proposed scheme. This RSA recommendation has **not** been incorporated into the proposed development.

Another example, item 2.1.17 from the Road Safety Audit states

The Audit team observed on site that the existing loading bay has not been incorporated into design. The audit team are concerned this may lead to parking two abreast when loading is required. This may lead to driver frustration, unsafe overtaking and head-on collisions

The picture included clearly shows the existing loading bay on Bridge Street. The response simply stated

Adequate loading bay spaces have been provided throughout the scheme at key locations

There is no loading bay included on Bridge Street in the design drawings and the Further Information Submission does not provide any data to support its removal despite photographic evidence included in the Road Safety Audit supporting the retention of this specific loading bay.

Another example, item 2.1.21

Gradient Of Angled Car Parking Bays

The Audit team observed angled car parking bays are proposed in the area of Market Street and Main Street. The existing spaces are angled such that easy entry by driving forward can be achieved with a wide carriageway to reverse out from. The Audit Team are concerned that the driver reversing into spaces with excessive gradients could result in a loss of control and lead to collisions with VRU

Recommendation

The design team should ensure suitable gradients of the angled parking bays at detailed design

The response logged states

It has since been acknowledged that reversing into the bays and pulling out forward with greater visibility of oncoming traffic is safer

The response does not state who made the stated acknowledgement. Concerningly, the response would appear to be for a different issue, i.e. the debate of "reverse-in" vs "reverse-out" for echelon parking spaces and not the issue of "ensuring suitable gradients of the angled parking bays"

I imagine there are other recommendations in the Road Safety Audit that have not been incorporated in the design.

I note that the Clifden RSA Response Tracker in Appendix 2 of the Further Information Submission does not use the format included with the Road Safety Audit Report, namely the format included in Appendix C to the Report "Road Safety Audit Feedback Form" as shown below.

To be Completed by Designer				To Be Completed by Audit Team Leader
Paragraph No. in Safety Audit Report	Problem accepted (yes/no)	Recommended Measures Accepted (yes/no)	Alternative Measures (describe). Give reason for not accepting recommended measure	Alternative Measures or reasons accepted by auditors(yes/no)
2.1.1	Yes	Yes		

It is not clear from the format of the RSA Response Tracker included in Appendix 2 of the FI Submission if the Audit Team Leader was given an opportunity to respond to or accept measures incorporated in the design post audit.

Item 1: Roads and Traffic subitem (ii)

I note that the Applicant was requested to clarify if the proposed development will impact on existing vehicular access/egress at the junction of Market Street/Bridewell Lane

The response was

Bridwell(sic) Lane provides an access point to a small yard that is surrounded by several sheds and garages. It is only very occasionally used by vehicles. As part of the scheme

proposals, we have however provided vehicle access to the yard area. Access from the carriageway/Market Street is provided via a 5.8m wide access point that will be surfaced in stone sett paving. This surface treatment will ensure that the route is consistent with the other materials being used as part of the public realm improvements, but the small plan size of the paving will mean that the access point is distinguishable from pedestrian areas but also can withstand vehicular use.

The design has been auto-tracked and we can confirm that vehicles up to the size of a box van can access the yard.

This statement describing Bridewell Lane is simply incorrect. The respondent has not seen fit to maintain the existing access at the junction but instead, as an alternative to correcting the design error of the original plan, has used dismissive language i.e. "small yard surrounded by several sheds and garages" and "It is only very occasionally used by vehicles" in an effort to minimise the impact the scheme would have on those who live and work on Bridewell Lane.

I do not wish to list all the people who require this access as the sole access to their properties. I will, however, make a number of points concerning my own property and some points regarding general use of the lane.

My family and I built and own a substantial commercial brewery on Bridewell Lane which we recently closed, in late 2024. This building is deceptive – its north facing aspect makes the building appear small because of the shape of the plot and our desire to work with the building line and respect the surroundings, particularly as it is next door to Clifden's Old Jail or Bridewell. Our building which either the respondent did not see or is referring to as a "shed" or "garage" is a multipurpose building split over 4 levels.

Crane access is required by us on Bridewell Lane for lifting equipment over the building for entry into and exit out of the basement via the southern aspect of the building. The equipment includes 12 stainless steel tanks, mostly 2000 litres in capacity with heights of 2.5 to 3m and diameters of up to 1.5m. There are other large and heavy pieces of equipment for milling malt and provision of cooling water for the process. This is not a "shed" with some small-scale equipment.

The crane access requirement is intermittent, but there is no other way to move equipment in and out of the building. The building simply does not work without the crane access and our existing right of access at Market St/Bridewell Lane must be maintained. Access only for a box-truck represents an unacceptable reduction in access.

While brewing we regularly receive deliveries of malted barley on a large curtain-sided truck. These large trucks need access to the building.

Additionally my family and I have lived full-time in this building above the brewery since 2008 and our movements alone in and out of the lane cannot be described as "occasional".

I refer to my observation on the original Application regarding others' usage of the lane.

Additionally, one neighbour owns an automotive garage on Bridewell Lane and this requires a suitable turning circle off Market St for large vehicles including trailers. Another neighbour requires access for a domestic vehicle and a trailer with a boat. None of these vehicle movements would be possible based on the design outlined in the Hard Landscape Proposal drawing.

The current proposal would block the ability of construction vehicles to access Bridewell Lane for building renovations or heavy deliveries.

These comments have not been addressed in the FI response.

The designers of the scheme have done little or no research on this area of Clifden. The lane is almost invariably misspelled, "Bridgewell Lane" on the original application, newspaper notice, site notice, "Bridwell Lane" as above on the FI response, etc. Furthermore, the dismissive nature of the language used in the FI response suggests a lack of desire to understand the existing use and requirements of Bridewell Lane. The original plan had a cycle lane going from Bridewell Lane to the Ballyconneely Road, but anyone who knows what a bicycle looks like and has even glanced at the steep gradient to the south of the Old Jail would not suggest a cycle path there.

The Respondent's lack of knowledge regarding Bridewell Lane is perplexing, considering that Galway County Council's office in Clifden can only be accessed from Bridewell Lane, a fact not included in the description of Bridewell Lane in the FI Response, as above. The County Council's Clifden office is used by County Council workers including Community Wardens, engineering staff and administrative staff and is visited by members of the public.

I hope that should the Commission see fit to approve the Application that approval would be subject to the condition that the Bridewell Lane/Market Street junction would be maintained with the existing possible turning circles. I believe that it is a reasonable condition, one vital to people who live, work and own property on Bridewell Lane, one that should not adversely affect anybody else and a condition that would be in the interest of sustainable development of the town.

Item 1: Roads and Traffic subitem (v)

The applicant was requested to clarify the number of parking spaces to be removed from the Town Centre

The response was

The Car Parking Survey Report (PR01C) Section 1.3.3 Parking Gap Analysis identifies that the proposed draft Town Centre Enhancement Plan retains 150 no. car parking spaces in the Town Centre thereby, resulting in loss of 63 no. car parking spaces when deducted from the original 213 no. spaces.

This does not correctly answer the question asked in the Further Information Request. The number of parking spaces proposed to be removed from the Town Centre is 100 or 103, depending upon which documents in the Application/Further Information submission are used as a basis.

The 213 spaces referred to in section 1.3.3 of the report is the sum of spaces on Main Street, Market Street and Bridge Street less the parking spaces used for outdoor dining in 2021. It does not include parking spaces on Seaview or Railway View (Market Hill). It does not include the five parallel parking spaces which double as market stall spaces on market days. It does not include the 12 parking spaces reserved for outdoor dining at the time of the parking survey.

By contrast, the retained 150 parking spaces are all the parking spaces to be included on Main Street, Market Street and Bridge Street PLUS Seaview (the portion in scope) and Railway View (Market Hill).

The two figures, 150 and 213, are counts of parking spaces in two different areas. The retained parking spaces count is from a bigger area than the existing spaces count area which is very misleading and leads to an incorrect figure of a loss 63 parking spaces.

Below is my analysis of parking spaces data taken directly from the Report.

Reproduced below is table 1-5 from the report, outlining the parking spaces retained

Location	Car Spaces Retained	Disabled Spaces	Loading Bays
Main Street	28	4	3
Market Street	76	4	1
Bridge Street	28	0	1
Market Hill	1	0	0
Seaview	9	0	1
Sub-Total	142	8	
Total	150		6

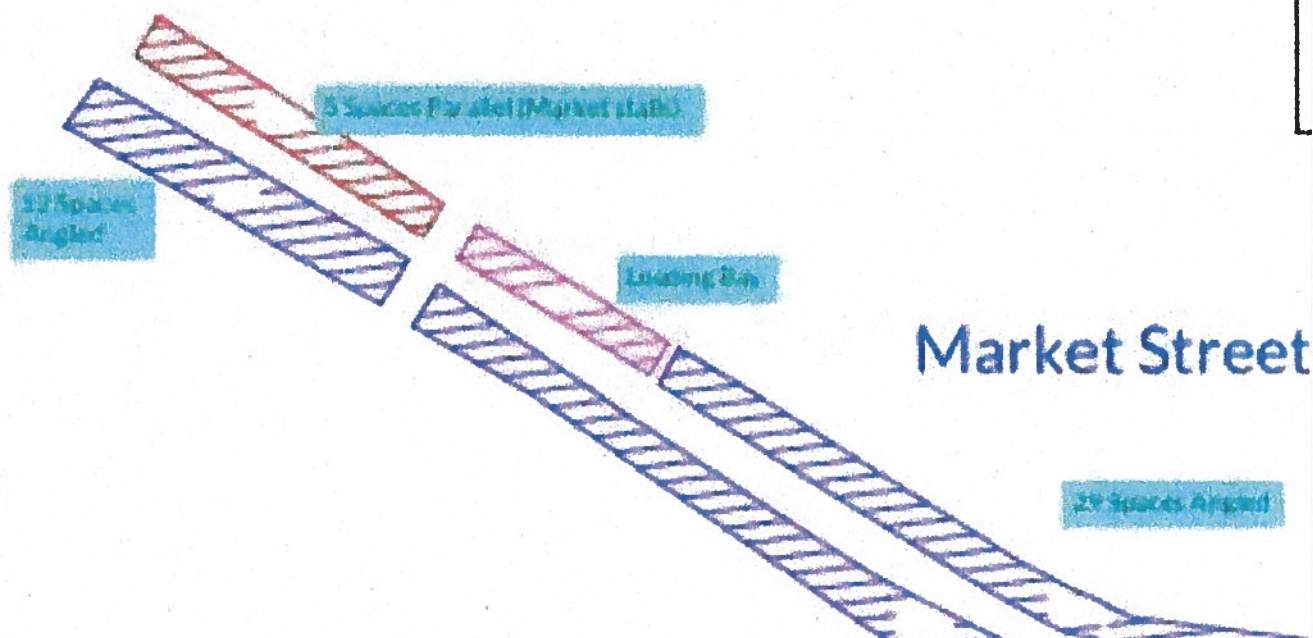
The existing parking spaces appear to be drawn from an occupancy analysis as per table 1-1 in the Report, reproduced partially below

Location	Total Spaces Available
Main Street	61
Market Street	128
Bridge Street	24
Outdoor Dining	12 (B)
Total	225 (A)
Total Town Centre	213 (A-B)

It is inappropriate not to consider the parking spaces dedicated to outdoor dining at the time of the Car Parking Survey. The absence of Market Hill and Seaview is evident in table 1-1. It is inappropriate not to consider the existing parking spaces on Railway View (Market Hill) and the portion of Sea View that is within the scope of the proposal which seeks to remove parking spaces from these streets. I would suggest that these areas were missed in the original analysis simply because the survey did not monitor them for the occupancy analysis.

Figure 1-5 of the report indicates that Market Street has 133 parking spaces, five more than the 128 listed on table 1-1. It can be concluded that table 1-1 has excluded the 5 parallel parking spaces which double as market stall spaces on market days.

Incidentally, such is the pressure on parking in the town during the summer months, these five parallel spaces typically end up accommodating up to 11 or 12 vehicles parked in angled fashion rather than parallel to the kerb. A highlighted screenshot from Google Maps shows this alongside a snip of Fig 1-4 where the equivalent parking spaces are denoted in red. Photographs included in the Road Safety Audit Report also show this angled or echelon parking pattern being used at the five parallel parking spaces. The analysis below includes only the five official parallel parking spaces, but removal of the spaces will have a bigger impact than the numbers imply. It is inappropriate not to include at least the 5 spaces in any analysis of parking space reduction.



Below is my expansion of the data included in table 1-1 in the Report. I have added in the parking spaces which are within the area that the “retained” parking spaces are counted but not included in table 1-1, i.e Railway View and the part of Seaview in scope. I have also added the “outdoor dining” and “market stall” parking spaces that were inappropriately excluded from the count of existing parking spaces.

Location	Spaces at time of Parking Survey
Main Street	61
Market Street	128
Bridge Street	24
Subtotal for primary streets	213
Outdoor Dining (on prim. streets)	12
Market Street (market stalls)	5
Railway View (Market Hill)	5
Seaview (spaces in scope)	18
Total Existing Spaces	253

In response to the Further Information Request, the Applicant has reiterated that there are 150 retained parking spaces as per table 1-5 of the report and my analysis of the existing spaces is 253 as above. Therefore, the number of parking spaces lost is 103 spaces or 41% of the existing number of spaces.

I wish to point out that there is a discrepancy between FI Response (i.e. the Car Parking Survey Report) and the drawings. The FI Response, in effect, has stated that the report has priority over the drawings. However, it is my experience as an engineer that drawings drive the detailed design and construction and generally take precedence over supporting reports. Contractors will build in accordance with drawings and specifications. The report is not a document that one would expect to be issued to a Contractor for construction – the aim of a document such as this Car Parking Survey Report is to inform design or prove a concept. The data in the report is out of sync with the drawings and I have previously argued the inappropriate timing of the survey at length in my observation on the original Application.

The following is my counting of parking spaces from the Hard Landscape Proposal drawings in the new scheme which presumably supersede the data from the Car Parking Survey Report. There are significant differences between my counting and the individual numbers included in Table 1-5. The count covers the same area as my expanded table of existing spaces (does not include the part of Seaview that is unchanged or Lower Bridge Street which is also unchanged).

Location	Car Spaces Retained	Disabled Spaces
Main Street	36	2
Market Street	72	4
Bridge Street	28	1
Railway View (Market Hill)	1	
Seaview	8	1
Subtotal	145	8
Total Retained Spaces	153	

This indicates 153 remaining spaces as opposed to the FI Response which states 150 spaces. If we consider 153 spaces are the number of parking spaces to be retained, then the number of spaces removed would be 100 (253-153) or 40% of the existing number of spaces.

The total number of parking spaces proposed be removed is 103 or 100, depending on whether you accept the total retained spaces included in Table 1-5 of the Car Parking Survey Report or count the retained spaces indicated on the drawings.

Regardless of whether the number of parking spaces to be removed is 100 or 103, this amounts to about 40% of the existing parking spaces for the town centre. There are no proposals to provide replacement parking spaces outside of the proposal area. It is inappropriate to suggest existing private car parking spaces can be used instead of the spaces being removed. For example, the Station House Hotel requires its own parking spaces for the hotel, apartments, leisure centre, theatre, bar, café, museum, retail units, staff parking etc. Typical availability of parking spaces in the Station House Hotel complex is limited in the summer months and that is despite several commercial units being currently vacant in the complex.

The Design Manual For Urban Roads and Streets (2019), section 2.1.2 states

...A lack of on-street parking facilities can also contribute to the obstruction of footpaths and cycle paths/lanes. Where demand for on-street parking exists and is not catered for, drivers routinely kerb mount and park on footpaths and cycle lanes (see Figure 2.12)

Currently, the insufficiency of car parking spaces during busy summer months leads to daily occurrences of kerb mounting, parking on double-yellow lines, cars parking in loading bays during restricted hours, vehicles parked blocking laneways and residential and business access ways.

Last Saturday 2nd August 2025 at 11:30am I walked around the town, via Market St, Main St, Bridge St and back to Market St. These were my findings:

- Market St - all parking spaces occupied with exception of 1 disabled space on the Eastern end of LHS of Market St.
- Main St - all parking spaces occupied except 1 space on Eastern end of LHS of Main St and 1 hidden disability space on the RHS
- Bridge St - all parking spaces occupied.

Additionally, there was "possibly non-conforming" parking as follows:

- There were two cars parked in the loading bay on the RHS of Market St.
- There were eleven cars parked on the market stall spaces on Market Square.
- There was one car parked on the double yellow lines on Market Square.
- There was one car parked on the pedestrian paving close to the Post Office on Market Square.
- There were three cars parked in the loading bay on the RHS of Main St (there are usually more).
- There were two vehicles parked in the loading bay on the RHS of Bridge Street.
- There were two cars parked on double yellow lines on the LHS of Bridge St.

Although there was one ordinary parking space empty during the walk around the town, the fact that there was illegal parking on double yellow lines and in loading bays indicates that the current number of parking spaces is insufficient.

I was surprised that there were not more available parking spots - I would have thought that the turnover of cars parking would have at least temporarily resulted in more spaces but any vacated space was immediately filled with the exception of the one random space on Main St - I think it most likely that space would be occupied before I finished my walk.

I decided against taking photographs during my walk because of possible GDPR infringements and/or having to edit photographs to protect the anonymity of people or vehicles. However the photographs included in the Road Safety Audit Report clearly show very little available parking at the time of the Road Safety Audit and there are further indications of insufficient parking spaces in that report as evidenced by cars parked in loading bays and commercial vehicles forced to double-park.

In this context I strongly suggest that the removal of 100 or more parking spaces, with no balancing measures, is a very undesirable proposal.

Item 4: Plans subitem (i)

The Applicant was requested to clarify the status of Clifden Local Area Plan 2018-2024.

The Applicant stated the expiry of the LAP but noted that “the proposed development is still in compliance with the goals and objectives of that LAP”. The Further Information submission states a number of objectives in the LAP with which the proposed development is stated to comply. The applicant further stated compliance with several objectives contained within the Galway County Development Plan (GCDP).

I draw attention to the fact that the proposed reduction in parking conflicts with several objectives of the GCDP in relation to Clifden and these are listed below. The removal of parking spaces at such scale, without replacement with similar nearby, or making provision for other alternative appropriate forms of transport, will have the effect of prevention of growth and development of Clifden, particularly the Town Centre.

CSGT 1 Sustainable Town Centre

Promote the development of Clifden, as an intensive, high quality, well landscaped, human scaled and accessible environment, with an appropriate mix of uses, including residential, commercial, service, tourism, enterprise, public and community uses as appropriate, that provide a range of retail services, facilities and amenities to the local community and visitors.

The town centre and associated main street shall remain the primary focus for retail and service activity within these plan areas.

CSGT 2 Sustainable Residential Communities

Promote the development of appropriate and serviced lands to provide for high quality, well laid out and well landscaped sustainable residential communities with an appropriate mix of housing types and densities, together with complementary land uses such as community facilities, local services and public transport facilities, to serve the residential population of Clifden settlement plan. Protect existing residential amenities and facilitate compatible and appropriately designed new infill development, in accordance with the proper planning and sustainable development of the settlement plan. Specifically encourage living over the shop which can contribute to the vitality of the core and extend activity beyond business hours.

CSGT 3 Community Facilities and Services

To encourage and support the expansion and development of existing community facilities and services to meet the needs of the local community.

CSGT 4 Business & Enterprise

To facilitate the expansion of businesses and enterprises uses in the plan area of Clifden where appropriate and to facilitate the provision of further local employment opportunities in accordance with the proper planning and sustainable development of the area.

CSGT 5 Tourism Development

- (a) Promote and facilitate the further development of Clifden as a key tourist destination for the benefit of the town and its surrounding areas.
- (b) To support and facilitate in co-operation with relevant bodies and landowners, the provision of tourism amenity routes around the town.
- (c) Encourage and assist the development of the sustainable tourism potential within Clifden in a manner that respects, builds on, protects and enhances the cultural, built, architectural, archaeological and heritage significance of the town including natural heritage and biodiversity, and its local amenities.

CSGT 7 Public Infrastructure

Support and encourage infrastructural development and improvement works that benefit Clifden as SGT and the wider Conamara region

Item 6: Submissions

The Applicant summarised the submissions made on the original Application and responded to a several points raised, both thematically and individually. I wish to comment on some of the content contained in this section of response document.

Parking Theme

The Applicant's response in the Further Information Submission to observations made on the original Application regarding parking states

The role vehicular parking plays to the vibrancy and economy of Clifden is acknowledged by the design team and has sought to be facilitated via the proposed development. The proposed reduction in parking has been thoroughly assessed according to best practice in the Car Parking Survey Report submitted by Tobin Engineering in the original planning report. That report assessed the provision of parking within the town centre itself, as well as further parking lots outside of the area which could be impacted by the proposed development.

It concludes that the spaces lost will be substituted by public parking locations outside the town centre, including the tourist office, station house, and proposed parking lot by the District Hospital and that therefore there is sufficient parking. It is acknowledged that the reduction in parking may result in an offset of activity to these locations, however, there is more than sufficient parking to serve the town centre including EV charging. In addition, improved wayfinding should enable drivers to more quickly and easily find available parking spaces. This availability of spaces is further enhanced by the provision of privately owned parking lots such as the SuperValu lot.

In my observation on the original Application, I have drawn attention to the deep flaws associated with the timing of the Car Parking Survey in a tourism-dependent town in November during a global pandemic. In the last week (in August 2025) there have been effectively no parking spaces in the town centre during core business hours in the town. Turnover of parking spaces is immediate. This results in vehicles parking on double-yellow lines, pavements, loading bays and blocking accessways. People park on my property and block Bridewell Lane, largely in frustration with the inadequacy of the number of existing parking spaces. The difficult-to-observe effects are the impacts on businesses and services in the town, but the resulting chaos leads to people going elsewhere instead and restricts possible growth and further development of the town centre. This is all before a proposal to remove 40% of the parking spaces.

The scope of the streets considered in the Car Parking Survey Report seems to fluctuate throughout the report, as highlighted previously in this observation. The streets included in the survey appear to be only Main Street, Market Street and Bridge Street as evidenced by the data presented, but proposed parking removal is from those streets AND Seaview and Railway View. The summary figures for proposed removal of parking spaces do not include the 5 spaces at the northwest of Market Street or the 12 spaces that were allocated for outdoor dining at the time of the survey. All of which culminates in the incorrect statement that 63 parking spaces are proposed to be removed. My calculations earlier in this document show it is proposed to remove approximately 100 parking spaces from those existing at the time of the survey. There is no way to consider that this is in the interest of sustainable development of the town.

The Applicant acknowledges that the reduction in parking spaces will drive people from the town centre, in direct contradiction of GCDP objective CSGT1. The Applicant presumes that those people leaving the town centre will travel to parking lots outside of the area such as the Tourist Office (presumably the Public Car Park behind the Tourist Office which is full this time of year), the Station House Hotel complex (typically almost full continuously this time of year, despite several empty retail units, dentist, etc), proposed parking lot by the District Hospital (there are no definite plans in place for such a parking lot). As for the suggestion that privately owned parking lots would provide parking spaces in place of those being removed seems fanciful - I have not visited the Supervalu car park recently (only a short walk from my home) but it is typically nearly full at this time of year.

Bus Stop Theme

Regarding the location of the Bus Stop, the Applicant states the following in the Further Information Submission:

The proposed bus stop area has been designed to the standards set out by the NTA and includes sufficient set down and taper space for an array of vehicles in the national fleet, as well as those used by private operators. The shelter and signage will be to be completed to the design standards of the NTA. The provision of a bus stop outside of a business or home is submitted to be a net positive from a planning perspective due to the potential for increased footfall for the business, and increased accessibility for any homeowners in the area. Further, as the area is set down only the visual impact of the stop should be temporary and minimal. The placement of the space on a hill should not hinder its operation, as evidenced by the numerous operating bus stops located on hills around the country.

The bus stop's existing location is extraordinarily convenient for me personally – I can travel from my home to locations all over the world only using public transport and not having to get in my car. I do question the location for when a second bus arrives at the bus stop. I have interviewed bus drivers who have parked on the yellow box at the Bridewell Lane junction and have been told that the driver would prefer to park in the yellow box rather than on the steep incline. It's not that it is not possible to park a bus there, it's just that it is not ideal. Considering so many changes are being proposed to the town's road design, layout and streetscape, it would seem to be a perfect opportunity to find the ideal location for the bus stop.

Footpaths Theme

Regarding footpaths the Further Information Submission summarises observations on the original application

...

Two respondents expressed concerns about the enhanced pedestrian facilities attracting

anti-social behaviour. The locations mentioned were the entrance/ crossing to Harbour Park and Sculpture 13 (in front of respondent's house) and the path between Bridewell Lane and Ballyconneely road. Sean and Jim O'Malley are concerned about losing pedestrian access to the lane adjoining the Bridewell Building behind Market Street, indicating they have a historic access. Harry Joyce is also concerned about access to Bridewell Lane, and the potential of the design to enable anti-social behaviour due to a lack of overlooking or activity.

And responds

...
The public realm, including footpaths, has been specifically designed to activate the town centre and make it a more engaging and livelier place. This includes elements such as public seating and pedestrian zones which have been placed carefully so as not to obstruct or narrow the footpath for users, while supporting a local café culture. This supports active and passive overlooking of the public realm and improve the feeling of safety. In short, the enhanced public realms and pedestrian crossings should decrease the potential for anti-social behaviour, not increase it. Access to Bridewell Lane has been addressed as part of Item 1, Subitem 2 of this response. Antisocial behaviour in Bridewell Lane is being addressed through the provision of a detailed lighting plan, as well as by opening up the lane through scrub clearance, enabling a more open design which minimises blind corners or narrow passages.

Lighting alone is not a deterrent to antisocial behaviour. I have found that if I leave my outside lights on during hours of darkness it is more likely to attract anti-social behaviour. Furthermore my experience is that the anti-social behaviour is almost equally likely during daylight hours. The key deterrent is overlooking or passive surveillance. Lighting can only act as a deterrent after dark where there is overlooking or passive surveillance.

The importance of passive surveillance is emphasized in DMURS in section 2.1.2 "The Pedestrian Perspective"

As recognised by the Guidelines for Sustainable Residential Development in Urban Areas (2009), the design of roads often results in an environment that is hostile for pedestrians (especially after dark). Blank walls and fences restrict surveillance and movement. If pedestrians feel isolated within a street because of its characteristics, they are unlikely to use it... Research has shown that a lack of activity and surveillance on streets is one of the key factors that discourage people from walking.

This statement is primarily about lack of pedestrian use of roads, lanes, etc. due to safety perceptions, but the very same characteristics are what make locations attractive for anti-social behaviour. The area south of the Old Jail is dominated by a blank wall and security fencing with negligible passive surveillance.

The provision of low-level lighting will not address anti-social behaviour. The requirement is passive surveillance. Low-level lighting will only encourage anti-social behaviour in the absence of passive surveillance. The addition of benches will not make the area feel less isolated.

The Further Information Submission suggests "opening up the lane through scrub clearance, enabling a more open design which minimises blind corners or narrow passages" which hints at possible improvements but this is not included in the design documents, emphasizing that this

portion of the scheme is not thought through to the extent where a design can be considered for proper planning and sustainable development.

Conclusion

The goals of the scheme were worthy goals which should have had near universal approval. However, the often-contradictory design pressures exerted on this type of urban redesign means that a good solution is difficult to achieve.

I have spent a great deal of time and effort coming to understand this Application because of my love of the area and because of my enthusiasm, as an engineer, for the goals of the proposal, but have found it frustrating that the design team did not seem to incorporate early feedback and seem unwilling to seriously address failings in the design.

The design for the town centre as presented in the application represents an unacceptable modification to the basic provision of services to people in the town and visitors, the result of which would severely restrict the existing town centre and limit its further development. The design for the Town Centre does not represent proper planning and sustainable development.

I had hoped that some form of the Town Centre part of the scheme could be implemented but the shortfall in parking provision is so extreme that I cannot conceive how minor alterations to the design could meet the broad goals of the scheme while acknowledging the realistic parking requirements of the Town Centre. Major alterations would be required.

I hope that the Harbour Park portion of the scheme can proceed and be implemented according to proper planning and sustainable development.

I also hope that some form of the Beach Road Quay scheme can be implemented.

Our Case Number: ABP-321144-24



**An
Coimisiún
Pleanála**

Inland Fisheries Ireland
Teach Breac
Earl's Island
Co. Galway

Date: 14 August 2025

**Re: Proposed development of a public realm scheme in Clifden, County Galway
Townlands of Clifden, County Galway**

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Commission has approved it with or without modifications.

If you have any queries in relation to the matter please contact the undersigned officer of the Commission at laps@pleanala.ie

Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Lauren Griffin
Executive Officer
Direct Line: 01-8737244

AA02

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**Iascach Intíre Éireann
Inland Fisheries Ireland**

The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

11th August 2025

Re: Section 177AE of the Planning and Development Act 2000, as amended – Notice of Significant Further Information on a Direct Planning Application to An Coimisiún Pleanála (Ref. ABP-321144-24) For the Proposed Development of a Public Realm Scheme in Clifden, Co. Galway.

Dear Secretary,

Inland Fisheries Ireland (IFI) is the State Body responsible for the protection, management and conservation of the inland fisheries and sea angling resource in Ireland. Protection of the aquatic environment and habitat is a vitally important element of IFI's work. IFI is mandated to ensure that the fisheries of the State are protected. "Fisheries" includes all inland fisheries recreational and commercial, sea angling and mollusc fisheries stipulated under the Fisheries Acts, the physical habitat upon which the fishery relies, the facilities and access, the quantity and quality of the water and the plant and animal life on which fish depend for shelter and food and the spawning areas where in fish deposit their eggs. The protective role of IFI relates to all aspects of the aquatic environment and all factors that influence the biotic communities within waters, which in any way relate to the propagation of fish stocks.

The application proposes public realm works to the Beach Road Quay, Town Centre and Harbour Park areas in Clifden, Co Galway. These sites are located adjacent to the Owenglin River which forms part of "The Twelve Bens/Garraun Complex" Special Area of Conservation (SAC), of which Atlantic Salmon are one of the qualifying interests. The Owenglin River gets good runs of salmon and sea trout each year and fishing rights are held by Clifden Trout Anglers Association.

The Bradóg Stream (referenced as an unmapped EPA watercourse in the application) flows under Main Street in Clifden adjacent to the proposed works site and is a tributary of the Owenglin River providing fisheries habitat for juvenile brown trout.

The Owenglin_030 and Clifden Bay waterbodies are currently both listed as good ecological status and not at risk under the Water Framework Directive, a status that needs to be protected. Clifden Bay is also a designated shellfish water under the European Communities (Quality of Shellfish Water) Regulations 2006 and is required to maintain specific water quality standards to support this fishery.

Having regard to these environmental sensitivities, IFI requests that consideration be given to the following points:

Protection of water quality and fisheries habitat

It is noted that the application includes mitigation measures to avoid impacts on water quality during the construction phase of the project. These measures are set out in the Construction and



Inland Fisheries Ireland
3044 Lake Drive,
Citywest Business Campus,
Dublin, D24 CK66
info@fisheriesireland.ie

Our ref: 210327
Your ref: ABP-321144-24

Date: 18th July 2025

Re: Section 177AE of the Planning and Development Act 2000, as amended – Notice of Significant Further Information on a Direct Planning Application to An Coimisiún Pleanála (Ref. ABP-321144-24) For the Proposed Development of a Public Realm Scheme in Clifden, Co. Galway

Dear Sir/Madam,

On behalf of our client, Galway County Council, of Áras an Chontae, Prospect Hill, Galway, H91 H6KX, we are writing to notify you that significant further information, as deemed by An Coimisiún Pleanála, has been submitted regarding the application under Ref **ABP-321144-24**. The planning application constitutes Local Authority Own Development Requiring Appropriate Assessment (also known as a Part 10 application) due to the necessity of providing a Natura Impact Statement (NIS) assessing potential effects on nearby designated sites as part of the application. You have received a copy of the application as a noted Prescribed Body, who was originally informed of the application.

The Development Description as set out in the original public notices is as follows:

“Planning and Development Act, 2000, as amended, Notice of Direct Planning Application to An Bord Pleanála. In accordance with Section 177AE(4)(a) of the Planning and Development Act 2000 as amended, Galway County Council are seeking approval from An Bord Pleanála for the proposed development of a public realm scheme in Clifden, Co. Galway.

The proposed works include:

- i. Alterations works to the Clifden Town Centre area on Seaview Road, Main Street, Market Street, Market Hill, Bridgewell Lane, Bridge Street, and Hulk Street comprising:*
 - a. The reconfiguration and resurfacing of roads and realignment of parking spaces including removal of 58 no. On-street parking spaces leaving a total of 155 no. on street parking spaces,*
 - b. The widening and realignment of existing footpath areas, including the provision of new soft and hard landscaping,*
 - c. The installation of new and upgraded public lighting throughout the town,*
 - d. Relocation of The Beacon Statue,*
 - e. Installation of new public art,*
- ii. Alterations to and resurfacing of Beach Road Quay public realm comprising:*

Galway - MKO, Tuam Road, Galway, H91 VW84 (**Correspondence address**)
Dublin - MKO, 9C Beckett Way, Park West Business Park, Dublin, D12 XN9W

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Lry & Water Limited, s MKO Registered in Ireland No. 338589, VAT No. IE0358589C
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- > The offices of the **Planning Department of Galway County Council (Public Counter)**, Áras an Chontae, Prospect Hill, Galway;
- > **Galway County Council Offices**, Clifden Area Office, Market St, Co. Galway, H71 Y892;
- > **The Offices of An Coimisiún Pleanála**, 64 Marlborough St Dublin 1, D01V902; and
- > **Online** at the Galway County Council Consultation Portal at <https://consult.galway.ie/>

A submission or observation in relation to the further information or revised plans may be made in writing to An Coimisiún Pleanála from the 21st of July 2025 and the 11th of August 2025 at 5:30PM, inclusive.

An Coimisiún Pleanála may give approval for the development with or without conditions or may refuse the application for development.

A person may question the validity of a decision by An Coimisiún Pleanála by way of an application for judicial review, under Order 84 of the rules of the Superior Courts (S.I. no 15 of 1986) in accordance with Section 50 of the Planning and Development act 2000 (as amended). Practical Information in respect of the judicial review process can be accessed on An Coimisiún Pleanála's website www.pleanala.ie or on the Citizens Information's website www.citizensinformation.ie

The deadline for receipt of submissions or observations to An Coimisiún Pleanála is the **11th of August 2025 at 5.30pm.**

Yours sincerely,



Ian Rathmell

Planner

MKO (Agents)

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