

Galway City Council
Draft Development Plan 2017-2023
Comhairle Cathrach na Gaillimhe
Dréachtphlean Forbartha 2017 -2023

Chief Executive's Report - Part 1

Response to Submissions



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Section 1 Introduction

Section 12 of the Planning and Development Act 2000 (as amended) sets out the requirements in relation to the making of the City Development Plan. This follows on from the initial stages of pre Draft Plan consultation and preparation of the Draft Development Plan and submission to the Council Members for their consideration. The Draft Development Plan was approved by the Council Members in December 2015 and this was followed by a period of public display and consultation.

The public consultation process extended from Monday 14th December 2015 to Friday 11th March 2016. As part of the process, the Planning Authority was required to publish a newspaper notice to notify the general public of the preparation of the Draft Plan and to invite written submissions or observations on the Draft Plan. In addition, the Planning Authority was required to send the Draft Development Plan specifically to the Department of Environment, Heritage and Local Government (DEHLG), the Northern and Western Regional Assembly (NWRA) and prescribed authorities (see list of prescribed authorities in Appendix A), and invite written submissions or observations on the Draft Plan.

The legislation requires that following the Draft Plan public consultation, the Chief Executive prepares a Report for the Council Members.

The Chief Executive's (CE) Report is required to:

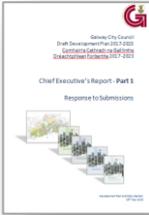
- List the persons/bodies who made submissions/observations and to summarise the issues raised;
- Give the response of the Chief Executive regarding the issues raised. The Chief Executive in his response must have regard to any specific directions issued from the Council, any statutory obligations of the local authority; any relevant national and regional policies /objectives and any observations made by the Minister for Arts, Heritage and the Gaeltacht in relation to submissions regarding additions to the Record of Protected Structures (RPS) which were recommended by the Minister.
- Summarise the issues raised by the DEHLG and issues raised and recommendations made by the Northern and Western Regional Assembly and to outline how these should be addressed in the Draft Development Plan.

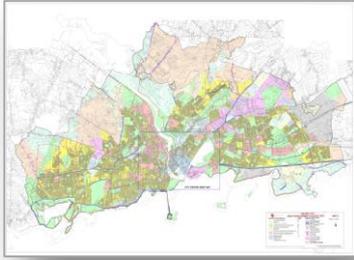
Next Steps

Following receipt of the CE Report, the Council Members have a period of twelve weeks to consider the Draft Plan and the Report that is not later than 17th August 2016. During this stage, the Council Members can adopt the Draft Plan with/without amendments. Should amendments be made that are of a material nature, these will be required to go on public display for a period of not less than 4 weeks and submissions invited from the public and prescribed bodies. These stages are highlighted in Fig 1.

Section 12 (11) of the Act states that in the making of the Development Plan, the Council Members are restricted to considering the proper planning and sustainable development of the area to which the Development Plan relates; the statutory obligations of any Local Authority in the area and any relevant policies or objective for the time being of the Government or any Minister of Government.

Format of Chief Executive’s (CE) Report

<p>Part 1 Response to Submissions</p> 	<p>Section 1 of the Chief Executive’s Report contains the introduction. Section 2 provides a summary of submissions by chapter and the CE’s response to submissions. The submissions received from the DEHLG and the NWRA are specifically dealt with under this section.</p> <p>A number of submissions did not have relevance to the Draft Plan. Many of these related to general Council operational issues; or are more appropriately dealt with through the development management process; or may have related to other legislation. These are included in Operation/Outside Remit Section of Part 1.</p> <p>The Environmental Appraisals Section of the Report deals with Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA). Screening exercises for SEA and AA have concluded that a full SEA and AA of a number of amendments will be required.</p> <p>Any additional proposed material amendments will also be assessed to determine potential impacts on the environment and European Sites and to consider flood risk.</p> <p>The Appendix section contains the list of persons/bodies who made submissions and details of the public consultation and prescribed bodies list.</p>
<p>Part 2 Summary Matrix of Submissions</p> 	<p>Part 2 includes the reference for each submission, the person/body making the submission, a summary of the submission and a cross-reference to the relevant response/recommendations of the CE.</p> <p>This section also includes a table with the submission numbers grouped into the relevant chapters.</p>
<p>Part 3 Recommended Amendments to Draft City Development Plan 2017-2023.</p> 	<p>Part 3 presents recommended amendments, these are grouped under the relevant Draft Plan chapter topics.</p>

Maps

Two maps are included;

Map of Submissions Received - Where rezoning submissions have been received, these have been mapped and a table included indicating the submission number, the relevant area of land and the type of re-zoning requested. Submissions requesting the insertion/omission of specific objectives where these amount to a material change from the zoning are also included.

Map of Recommended Amendments - Where amendments are recommended to the Draft Development Plan Land Use Zoning Map, these have been mapped and are also included as small map extracts under the relevant chapter topic in Part 3.

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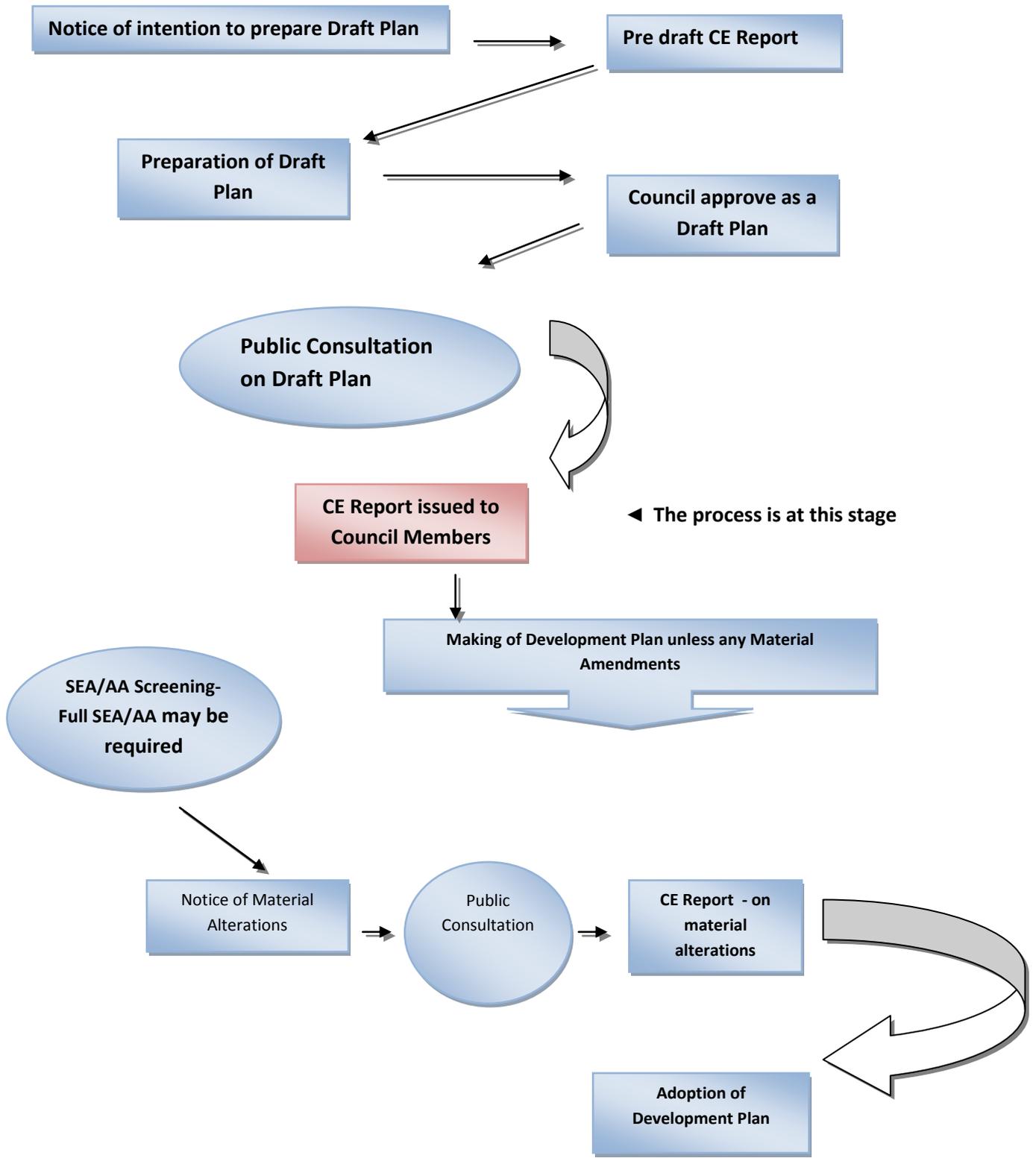
This Chief Executive's Report on the Draft Plan Consultation is hereby submitted to the Council Members for consideration and includes the following:

- CE Report – Part One, Part 2 and Part 3;
- A map showing recommended mapping amendments to the Draft Development Plan Land Use Zoning Map;
- A map showing submissions requesting re-zonings and specific objectives;
- A CD with scanned copies of all submissions.

Council Meetings to consider the CE Report are scheduled as follows;

Month	Type of Meeting	Date
June	Special Meeting (CDP) 3pm	Monday 27 th June
June	Special Meeting (CDP) 3pm	Wednesday 29 th June
July	Special Meeting (CDP) 3pm	Friday 1 st July
July	Special Meeting (CDP) 3pm	Tuesday 5 th July
July	Special Meeting (CDP) 3pm	Thursday 7 th July

Fig.1 Stages in the Development Plan Process



Section 2 Summary of Submissions and Chief Executive's Response

As indicated all submissions received have been fully assessed and have been considered in the context of the chapters in the Draft Development Plan to which they most relate. For some this meant inclusion in more than one chapter. The approach in the CE response was first to ascertain if the points raised could be best addressed in the development plan. If so then to examine if they were already dealt with by the draft policies and objectives in the relevant chapters. If not, to indicate if amendments to the Draft Plan are appropriate and to indicate where changes are proposed.

A substantial number of submissions, 48 in all were requests for re-zoning (these are mapped on the submissions map). All requests for re-zoning have been addressed in the context where they fit best. Requests in relation to specific objectives are addressed mainly in chapter 11 but may also be in chapters where they are considered best fit.

Issue based submissions, which contained views, suggestions and opinions have been dealt with in the context of the chapters to which they had most relevance. As a number of submissions expressed similar views these have been grouped to avoid repetition and may represent more than one submission. Regardless of this, Section 2 facilitates the matching of particular issues to particular submissions. To further facilitate the Council a matrix card is enclosed which lists the Chapters and the submissions to which are primarily associated.

The headings for examination are as follows:-

- Chapter 1 Core Strategy
- Chapter 2 Housing and Sustainable Neighbourhoods
- Chapter 3 Transportation
- Chapter 4 Natural Heritage, Recreation & Amenity
- Chapter 5 Economic activities
- Chapter 6 Retail Strategy
- Chapter 7 Community & Culture
- Chapter 8 Built Heritage & Urban Design
- Chapter 9 Environment & Infrastructure
- Chapter 10 City Centre & Area Based Plans
- Chapter 11 Land Use Zoning Objectives & Development Standards and Guidelines
- SEA Environmental Report
- Natura Impact Report
- SFRA

Chapter 1 Core Strategy

Summary of Issues Raised

Strategic Vision and Goals:

- Include 'promote a healthy environment' as the eighth strategic goal in the Development Plan.
- Amend section 1.2 strategic Vision to incorporate clearer time horizons of - near future: 0-10 years; Short Term: 10-20 years; Medium Term: 20-50 years; Long Term: 50-100 year. All plans/projects to use these timescales to ensure they are strategic and work towards realising the vision for the city.
- Add a new Strategic Goal under Section 1.2 to support and facilitate an 'Oil-Free' Galway City by 2030.
- Revise 1.2 Strategic Vision Galway, Strategic Goals to include reference to the Council become a 'Council in Transition' such that sustainability and resilience is central to all Council's policies, work and activities and make ecological limits and sustainability central to land use, buildings, water, energy, waste, sustainable transport modes, and integration of land use transportation.
- Support the vision of a sustainable, inclusive and people centred city.

Core Strategy:

- Review Core Strategy and map to update status of N6GCTP and include as a strategic goal in the Core Strategy *to support the development of a transport solution to the existing congestion on the national and regional road network in Galway Gateway and environs.*
- Fully integrate the Transport Strategy (ITMP) into the Development Plan. Revised Core Strategy to take account of the Transport Strategy. Suggest the Core Strategy should give a separate section to the Transport Strategy.
- The Draft Plan provides a strategic framework for the proper planning and sustainable development of the area and gives spatial expression to the economic, social, cultural and environmental aims of the City. It provides a well thought out and comprehensive planning assessment of Galway City.
- The core strategy allows for the RPG targets to be achievable through the combination of land availability of residential zoned land, regeneration areas, vacancy and Ardaun phase 1. The core strategy figures appear in line with National and Regional guidelines.
- A number of specific objectives within the Draft Plan allow for residential development to be considered within specific areas of different land use zonings which allows for a degree of flexibility and adaptability in terms of residential land availability within the urban setting of Galway. To ensure transparency a Specifics Objective Map highlighting the objectives and reference this cohort within the core strategy should be considered.
- Omit Ardaun LAP zoning and identify area as 'Future Development Lands/Strategic Landbank' as it is could not be developed in the short term and should not delay transport and housing projects.
- Include that employment land or zone swaps between the east and west of the city would be considered to ensure better balance between economic development and residential development.
- Ensure population and economic growth, (and associated development), are linked to the ability to provide adequate and appropriate critical service infrastructure, in collaboration with other key stakeholders. Notes intention to collaborate closely with Irish Water in providing service infrastructure (drinking water and wastewater) to service development.

Sustainability:

- Recommends the adoption of a sustainability framework based on the ten *One Planet Living* principles which include; zero carbon, zero waste, sustainable transport, sustainable materials, local sustainable food, sustainable water, land use & wildlife, culture & community, equity & local economy and health & happiness.
- Suggest a more extensive definition of sustainability be included in the glossary of Plan.
- The Plan should be consistent with 'Transforming our World: The 2030 Agenda for Sustainable Development' (UN 2015) and the Paris Climate Conference (COP 21).
- Cites NW Bicester, UK, Eco-town as an exemplar of sustainable development.
- The vision for the city must include equity and aspire to equal opportunity for all citizens of Galway in terms of housing, education, employment, public transport, leisure, culture, heritage, healthcare and well being regardless of age, gender, special needs, health, social background and ethnicity.
- Requests the inclusion of a statement that the principles of equality, sustainability and accessibility underpin the Plan.
- Acknowledges that environmental considerations have been integrated into the Plan through specific commitments to promote measures to reduce greenhouse gas emissions by encouraging increased use of public transportation, walking/cycling, protecting environmental sensitivities including designated sites and protected species, incorporating protection and incorporating of green and blue infrastructure into developments, and also providing for coastal zone and flood risk management.
- Revise or strengthen wording so that, for example, 'sustainable' is defined in part to mean that adverse affects on the conservation objectives and integrity of European sites (and also NHAs) will not result.

Other:

- Caution should be exercised in supporting other plans and strategies, or in giving effect to their recommendations for development and land uses, if such plans or strategies cannot demonstrate their own compliance with the Habitats Directive or if they are subject to appropriate assessment as part of the current plan
- Amend references in plan including Legislative Background' page 6 to clarify that terms 'NIR' and 'appropriate assessment' and when the latter is carried out.

Response:

All positive comments are noted and welcome.

Strategic Vision and Goals:

The Vision for the city and the Strategic Goals in Ch. 1 encompass a broad framework for sustainable planning in the city. The promotion of a healthy environment is already included in the first Strategic Goal. It is not considered necessary to further amend these goals either to add text or to promote a specific view on sustainability as requested as this area is well covered.

The nature of the vision is not exclusively controlled at local level, it is linked with regional, national and global, (e.g. greenhouse gases), decision making. It therefore does not lend itself to local timelines. Regardless, some will always be ongoing such as striving for an inclusive and equal city, functioning as a regional capital. The objectives in the plan of a specific nature are more suitable to be monitored on a time basis and these will be subject to a two year review after adoption of the Plan. In addition it is considered that the LECP and the City and County Economic Strategy will

provide more of a focused remit for achievable targets at local level with respect to the local economy and community.

Core Strategy:

The Core Strategy has been amended to accommodate the Galway Transport Strategy (GTS) and the N6 GCRR project. The amended Chapter 3 includes for specific policy support for all transport measures. All associated mapping shows the strategic measures associated with proposals for an integrated transport strategy including public transport, walking, cycling and a new strategic road (N6 GCRR).

It is proposed to include a map in Schedule 1– Housing Strategy that will highlight all undeveloped residential zoned lands and other locations where residential development can be delivered on other zonings as referenced in the Core Strategy. This illustration will be inserted when all zonings have been finalised and adopted by the Members prior to publishing.

No amendment is proposed in relation to Ardaun LAP as these lands have been considered as part of and critical to the Core Strategy of the Draft Development Plan. Issues raised in the submission, such as associated infrastructure and community services, will be in the remit of the LAP. The transport strategy confirms that the pursuance of this settlement strategy will not frustrate the included measures but rather complement it as an integrated approach to development. The objectives to develop Ardaun will endeavour also to address the east/west unsustainable imbalance between employment and residential areas in the city and represents an integrated approach as is required from the Core Strategy.

Sustainability:

Embedded in all goals is the philosophy of sustainability which permeates through all consequent chapters and the associated environmental assessments. It is not considered necessary to add text or to promote a particular view or target on sustainability, these are better linked with national adoptable standards and commitments. The Draft Plan follows on from national policy with regard to sustainability, climate change and environmental standards and these standards are included for in assessment through the SEA, AA and SFRA.

The Plan does include specific goals (no's 4 and 5) on an equal, accessible and inclusive city in the context of land use planning.

The strengthening of wording is being addressed through HDA assessment of the Plan with respect to the conservation objectives of European sites, it is also being addressed through strengthening of the development plan policies in particular as set out in chapter 4, in particular section 4.2 Protected Spaces.

Other:

The Plan will be reviewed to remove any ambiguity relating to the use of the terms NIR and Appropriate Assessment. Other plans and projects inform development plan policy but regardless the Plan itself undergoes its own assessment. All relevant points raised will be taken into consideration in the drafting of an updated NIR.

The definition of sustainability in the glossary section of the Plan will be further explained and elaborated to mean no resulting adverse effects on the conservation objectives and integrity of European Sites.

The CE report includes for a number of proposed amendments to the Draft Plan that will have impacts of significant scale. In particular the inclusion of an amendment to accommodate the reservation of a corridor within which the N6 GCRR road can be designed and constructed will have impacts on the quantum of residential zoned lands available for development in the next two years.

This period is estimated as the time required for the road design to be finalised, consent sought from An Bord Pleanála and a sufficient period for the Board to arrive at a decision. Following which, the capacity of residual lands available for development purposes will be apparent. In the interim however there is an obligation on the Planning Authority to have sufficient lands available for the development of housing which is a critical issue for the city and indeed the state. There is a need to take into consideration the consequences of the amount of land that, although zoned residential and calculated as such in the Core Strategy, will not be available at least in the next two years for these purposes. Should a positive decision issue from An Bord Pleanála there is likely to be a residual amount of land released from the corridor but this is not yet known and no decision will be made in the near future.

In this regard the submissions which requested re-zoning for residential purposes were all considered and their merits examined. In general they were assessed in the context of the overall Core Strategy and the City Development Plan settlement strategy. They were then further assessed under more specific planning criteria. The issues examined included those relating to the capacity of the lands to be linked in, in a sequential manner into the existing settlement patterns, the capacity of the lands to be serviced by infrastructure and transport, the capacity to achieve safe access and the proximity of essential services. In addition the existing zoning were assessed – in particular for sites located in sensitive amenity and visual areas, such as those in the **A** and **G** zone, sites that could not be serviced in near future and sites that could frustrate long term strategies in the plan. Following this assessment only some of the submissions qualified for examination.

Those now recommended for zoning are all associated with submissions received. The bank of land at Letteragh is recommended for re-zoning from **A** to residential **R** zoning. This bank of land has significant merits over other lands for re-zoning. It has potential to be serviced if connected in with the recently extended Knocknacarra Drainage Scheme. It is sequential to the existing settlement pattern, located opposite developed lands which have developed a good standard of road and pedestrian access and associated public realm. It is located close to services and can link in with existing and future road networks. These lands measuring 11.8 ha would include a portion of land included in submission No. 230.

A smaller bank of land at Castlegar, the subject of submission No. 223 is also recommended for changing from **A** agriculture to **R** residential zoning. These lands are surrounded by residential and industrial/commercial zoning and face onto a highly trafficked Tuam Road. They have been assessed in a general manner from a services and transportation perspective which indicates that they are potentially suitable to be in linked into a newly laid sewer but will have to ensure that access arrangements are safe and comply with road junction proposals for the area also.

In addition, a site off the Moycullen Road, the subject of a submission No. 012 is proposed to change from **A** to **LDR** low density development. There is already an established pattern of such type of development in the area of Barnacranny already. The topography and access arrangements would be challenging for standard density housing but the lands do have the benefit of a connection to the public sewer and a newly developed access arrangement. In addition it would represent a pocket of land siphoned off from other **A** zoned lands by the N6 GCRR and associated link roads corridor.

The justification for bringing forward these amendments is made in the context of the impact of the reservation of a very extensive corridor for the N6 GCRR. These proposed amendments have been examined in the context of the Core Strategy, the Housing Strategy and the quantum of land zoned residential that would be essentially unavailable for housing as a result of the reserved corridor of the N6 GCRR. It is considered in this context the proposed amendments are compatible with the Core Strategy. However the decision regarding the amendments for the N6 GCRR should be made first as the zoning changes are only relevant where this decision is being made and agreed acceptable.

Recommendations:

Proposed amendments relating to this Chapter include Amendments No's;

- A1.1
- A11.19
- A11.20
- A11.25

Chapter 2 Housing and Sustainable Neighbourhoods and Schedule 1 Housing Strategy

Summary of Issues Raised

Housing Supply:

- Include in chapter 2 a table identifying sites that are 1) unconstrained and are available for residential development, 2) lands zoned that will be ready for development within the medium term (within next five years), and 3) zoned residential land that is currently constrained and not available for development due to reasons such as infrastructural issues. This would assist in alignment of demand and supply, allow for a focused and transparent active land management system and assist in the development of the housing market.

Housing Strategy:

- Ensure that sufficient zoned and serviced land is available to the market for the duration of the Development Plan.
- Replacement of Part V with 1% levy on the sale of new and existing units is more equitable.
- Include policy for new and improved student accommodation at appropriately located sites in the city to meet student housing needs.
- Questions Part V, Traveller Accommodation Plan, Homelessness strategy and other strategies to improve the delivery of social housing and reduce housing list.
- The achievements of the previous City Plan and the expected achievable outcomes of the Draft Plan with regard to social housing provision should be stated under Schedule 1 S1.5.
- Annual review of the implementation of the Plan in conjunction with stakeholders required.
- Evaluation of previous housing strategy required.
- Welcomes the incorporation of Universal design and life time adaptability.
- Incorporate Health Impact Assessment as part of overall housing strategy.
- Consult with and incorporate the needs of all various groups including people with disabilities and older people in the provision of housing,
- Greater reference to housing for older people, sheltered housing and support services and maintenance is required, including maintenance of local authority stock and vacancy management and establishment of fund to reinvest in housing stock.
- Refer to the growth in homelessness with a short term response.
- Specifically support student accommodation delivery which can help free up capacity in the private rented sector.

Residential Density:

- A more diverse mix of housing types should be provided within each neighbourhood to reflect different housing needs and tenure.
- Seeks higher density for site no.'s 38, 39, 41, 42, 43 and 45 Newcastle Road, given its highly accessible location to a range of facilities and services, eliminating the need for private car use and meeting urgent housing need.
- Support increased development of Inner Residential areas.
- Need to develop higher density (max. 6 storey's) to achieve critical mass at appropriate locations with associated open space and community infrastructure in order to have a compact city.
- Higher plot ratios and lower open space requirements should be permitted, and different controls and standards should be developed for different areas.
- Develop high density development areas along the rail line with regular train stops.

- Restrictions on redevelopment and intensification in existing residential areas should be removed. A strategy to allow progressive intensification and redevelopment in existing residential areas is required with quality controls such as height in different areas of the city

Universal Design and Energy Efficiency:

- Concept of Universal Design Homes is very important.
- Policy 2.5 Outer Suburbs should be revised to read as ‘ensure the promotion of universal design in the design of residential developments’ as opposed to encourage.
- A strategy is required in Section 2 Housing & Sustainable Neighbourhoods regarding nearly zero energy buildings and EU requirements for high energy performance buildings.

Traveller Accommodation:

- Need for more integrated and better designed traveller accommodation.
- A culturally appropriate response is required for Traveller homelessness, which is a growing issue, and to estate management and tenant liaison.
- Inclusion of Traveller Accommodation in a range of land use zoning objectives is welcome.
- Should include explicit commitment to provide culturally appropriate accommodation and that such accommodation would also include facilitation of traveller economic and trade activities, including land and facilities for horses.
- Meaningful participation with Travellers is essential, including in the Planning process, and should be part of the implementation of all specific objectives outlined in section 2.12.

Planning Legislation:

- Include reference to the Urban Regeneration and Housing Act 2015 within section 2.0 Housing and Sustainable Neighbourhoods specifically referencing the vacant site levy outlining the implications of the introduction of this levy in Galway City.
- Reference to Section 28, Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2015 should be incorporated into the draft Plan, particularly within chapter 2 Policy 2.2 Housing Strategy and in the Residential Densities text in Section 2.4; in chapter 11 Section 11.3 Residential Development regarding private open space standards and in Schedule 2, page 210.

Housing & Sustainable Transport:

- Consider in Policy 2.4 Neighbourhood Concept & 2.5 Outer Suburbs for residential developments to have regard to audit tool ‘Walkability Audit – How Walkable is your Town’, Centre for Excellence in Universal Design 2015.
- Section 2.4 in relation to creating sustainable neighbourhoods refers to reduced traffic movements but should reference the threat to neighbourhood and community arising from rat running and through traffic. The elimination of through traffic should be central to neighbourhood policy and steps taken to protect neighbourhoods such as selective road closures and traffic cells.
- In section 2.4 Neighbourhoods: Outer Suburbs and in section 2.5 established suburbs and section 2.7 inner residential areas in relation to Redevelopment additional wording is proposed to restrict infill development on lands that would be obvious access corridors and school routes for pedestrians and cyclists.
- In section 2.10 Village Envelopes/Areas reference should be made to the impact of rat running and through traffic on the amenities of these areas and that measures will be taken to retain the character of these areas through elimination of through traffic by using selective road closures and traffic cells and restoration of historical road widths.
- Insert reference to car-free neighbourhoods in Policy 2.5 Outer Suburbs.

Village Envelopes:

- Review and revise the zoning of one part of an SAC as 'residential' as part of a 'village envelope' in Menlough area.
- Extend the Menlough village envelope to release land for housing which would not interfere with the character of Menlough and would build upon the existing assets of the community.

Housing Design:

- A clear commitment to the principles of universal access and whole-of-life design is required in the Plan.
- Support modular housing.
- Requires detailed guidance on home zones and more innovative design approach to amenity spaces

Other:

- Revise Policy 2.5 to include for the obligatory need for bi-lingual place names and signage in the Gaeltacht parts of the city only and not have any directional signage exclusively in Irish.
- Insert a new policy under Policy 2.2 Housing Strategy to support the development of new housing along the Galway to Oranmore rail line.
- Insert a new policy under Policy 2.2 Housing Strategy to support and facilitate intentional communities such as eco-villages, co-housing communities and housing co-ops.
- Support infill development on residual open spaces.
- Redevelop small houses in Bohermore to 4 storey height or if protection is considered, they should be designated.
- Insert the following policy to address restrictions to extensions - *Residential Development- Extensions or alterations to existing residential properties may be proposed that are outside of the specific development Plan standards and these will be considered on their merits with reference to national regulations for development exempt from Planning control.*
- Lack of complimentary community facilities in residential neighbourhoods.
- Include in section 2.1 that housing and accommodation will be considered in a holistic manner.
- Plan lacks detail on implementation and monitoring and ongoing consultation with stakeholders.
- Include commitment to support of sustainable citizen initiatives such as Housing Cooperatives, Community Land Trusts, Co-Housing, and off-grid developments.
- Include wording that all Planning should be carried out in consultation with residents.

Rezoning of R/LDR zoned lands:

There are 10 overtures for re-zoning of lands from residential land use zoning to other land use zones including CI, CC, CF, RA and LDR to R. Requests for the rezoning of 5.54ha (13.69acres) residential lands to other land use zonings.

Rezone R/LDR to CI:

- Rezone lands from R to CI at Lidl, Doughiska Road to reflect existing retail use. Revise the route of pedestrian /cycleway specific objective from car park area to along northern boundary of site to the existing QBC corridor . Rezone existing transport corridor and lands to the rear of Lidl from R to CI as R zoning is impractical.
- Rezone R to CI to better reflect existing hotel use and to allow for greater plot ratio. Apply a flexibility of plot ratio in CI zones, maximum plot ratios should be identified as indicative only.

- Rezone lands (0.4ha/0.99acre site beside Clayton Hotel) from R to CI to allow the consideration of small supermarket/discount store at this location to enhance the vitality and viability of Briarhill Shopping Centre. The development of small supermarket/discount food store at this site would be consistent with the Retail Strategy. There is a deficiency of these stores to serve the east of the city. Proposal is more in keeping with adjacent development. Site is inappropriate for residential development in view of adjacent commercial developments and the noise environment (noise appraisal report included). Permission previously refused by An Bord Pleanala based on existing zoning.
- Rezone LDR land to CI lands at Tuam Road (065).
- Rezone Pharmacy and Mortons from R to CI to reflect long established commercial use and proximity to existing CI uses. Rezone 144 Lower Salthill from R to CI to provide an integrated and cohesive commercial centre.

Rezone R to CC:

- Rezone the site of former Anglo Bank premises, Foster Street from R to CC zoning

Rezone R to CF:

- Rezone from R to CF at new vehicular access at Newcastle Road to reflect the existing use as access to university.
- Rezone Martin Ryan Institute Annex and adjacent lands from R to CF to reflect the existing institutional use of the site.

Rezone R to RA:

- Rezone land from R to RA at Dun na Mara, Renmore. Used and maintained by residents as open space for 50 years.

Rezoning of LDR to R:

- Rezone land from LDR to R, Circular Road.

Change LDR zoning:

- Change LDR zoning in Menlo Village envelope which is part of the Lough Corrib cSAC.

Response:

Housing Supply:

The provision of a table in chapter 2 identifying residential sites and lands and their constraints and timescales for development is not feasible or appropriate. There are a range of issues which impact on the development of residential sites within the city and which are not easily tabulated. The development of such sites is complex and dynamic and can be affected by many constraints which are not readily identifiable and attaching likely timescales to their development would not be prudent.

The Core Strategy highlights undeveloped lands suitable for housing and priorities are set out as part of a clearly defined settlement strategy. The Core Strategy also sets out where priorities for infrastructure are required.

The Housing Strategy in Schedule One -*S1.4 Analysis of housing demand and supply* - gives further detail to the availability of lands and gives considered outputs up to 2023. Constraints associated with various sites across the city are more readily dealt with through pre planning meetings which tease out complex issues and give detailed direction to developers.

It is recommended that the Draft Plan is amended to include a map in Schedule 1– Housing Strategy that will highlight all undeveloped residential zoned lands and other locations where residential development can be delivered on other zonings as referenced in the Core Strategy. This illustration will be inserted when all zonings have been finalised and adopted by the Members prior to publishing.

A specific objective is included in Chapter 2 to set to investigate measures to expedite construction of housing in the city. This is recommended to be alerted to be a Local Housing Forum which will try to assist in expediting the developing of housing in the city.

Housing Strategy:

The Core Strategy is required to ensure that there is sufficient capacity to satisfy the housing needs of the targeted population as set by the Regional Planning Guidelines (98,700 by 2022). As explained in the CE response to the Core Strategy, a number of amendments are proposed to the Draft Plan to ensure that there is sufficient capacity. These amendments are included in Part 3.

The Development Plan in Chapter 2 and the Housing Strategy in Schedule 1 recognise the significant need for student housing in the city and a specific policy to support student housing is included in Policy 2.2 Housing Strategy. Detailed requirements for student housing are also included in Chapter 11 section 11.29 and it is recommended that the Draft Plan is amended to elaborate on the requirements for or new and improved student accommodation at appropriate located sites in the city to meet student housing needs.

Various strategies and plans are in place to support and facilitate the delivery of social housing, however, its delivery is very much dependant on central government financing and funding initiatives. The Housing Strategy in Schedule 1 of the Plan gives details of social housing provision under the various current initiatives and gives a detailed analysis of social housing demand and supply. The achievable outcomes for the Plan period will be highly dependent on central government funding. Details of the DECLG housing capital programme for the city 2015-2017 are included in Section 1.5.

Any review of the Plan or Housing Strategy is dictated by planning legislation which currently requires a two year progress report to review the implementation of the Plan and the Housing Strategy. This is done in conjunction with Elected Members.

The Plan which includes the Housing Strategy is not required by legislation to be accompanied by a Health Impact Assessment however the process of SEA does incorporate assessment of broader elements of health impact such as in relation to impact on human beings, policy in relation to green network, amenity, air and water quality.

Chapter 2 and the Housing Strategy sufficiently recognises the housing and associated needs of all various groups, including people with disabilities and older people. Specific policy to support the housing needs of the elderly and persons with disabilities is set out in policy 2.2 and in the Housing Strategy, Schedule 1.5 under the specific housing needs section. With regard to management and maintenance, the Council, on an operational level, include for maintenance programmes for existing social housing stock and for vacancy management of council housing stock.

The growth in homelessness nationally is recognised and the Housing Strategy highlights the range of homeless provision services both short and long term that are available in the city. The Plan already includes specific policies to support those involved in the provision of emergency and crisis accommodation and actions set out in the Local Homeless Plan for Galway City (2015).

Residential Density:

Chapter 2 supports achieving a diverse mix of housing types within each neighbourhood which would cater for different housing needs and tenure, which allows choice in the market and allows for lifetime communities, where people can meet their specific needs over time without having to leave their neighbourhood. Development density standards in the Plan are based on plot ratios which encourages a range of house types of different sizes as opposed to a standard house per acre. The plan does not preclude consideration of modular housing (now known as 'rapid build') as an option in the city.

Policy 2.5 already encourages higher residential densities at appropriate locations especially close to public transport routes. Density standards achieved in the newer neighbourhood areas in the outer suburbs in recent years have been well balanced, achieving the necessary critical mass to sustain essential infrastructure and sustainable communities.

In certain cases high density development would not be appropriate having regard to availability of services, context of the site and the established character of the area. In particular, in the established and inner suburbs, densities must be balanced with protection of existing residential amenity and character of these areas. An increase in plot ratio and decrease in open space standards would be a retrograde step and would seriously diminish the concept of achieving sustainable neighbourhoods.

Redevelopment and intensification in existing residential areas is not precluded, however certain controls and guidance as set out in Chapter 2 are required to ensure that the character and residential amenity of these areas is not unduly compromised

With regard to increasing the density standards for building no's 38, 39, 41, 42, 43 and 45 on Newcastle Road, this is not considered appropriate given the residential zoning objective on these lands and having regard to the existing character of this section of Newcastle Road and surrounding residential amenity. The existing zoning acknowledges the local level of services in some of these units which is acceptable in R zoned lands.

Universal Design and Energy Efficiency:

The comments with regard to Universal Design are noted. The Plan supports universal design and makes reference to universal access and design with regard to residential design, transportation and the green network. Universal design guidelines, unlike Section 28 Guidelines, are not mandatory therefore the wording to encourage universal design is appropriate.

Section 2.5 includes appropriate support for the integration of energy efficiency into house design and layout of neighbourhoods.

Traveller Accommodation:

Comments with regard to Traveller accommodation are noted. The Plan recognises that travellers have specific accommodation needs and refers to implementation of the Traveller Accommodation Programme 2014-2018, and any consequent plan which sets out the specific needs of Travellers in the city.

With regard to participation of Travellers in the Planning process, the statutory consultation process is open to all. It is not considered appropriate to include for mandatory participation with travellers in all planning processes. Consultation with Travellers and their representatives is an important part of the TAP (Traveller Accommodation Programme) and active consultation with Travellers on a range of issues through the Council's Traveller Liaison Officer and the Traveller Consultative Committee is ongoing.

Planning Legislation:

It is recommended that reference to the Urban Regeneration and Housing Act 2015, within Section 2.0 Housing and Sustainable Neighbourhoods specifically referencing the vacant site levy outlining the implications of the introduction of this levy in Galway City, is included as an amendment to the Draft Plan. Similarly it is recommended that reference to the recent *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities*, 2015 should be incorporated as an amendment to the Draft Plan and the national documents and guidelines relating to Climate Change Adaptation in the context of the planning system.

Housing & Sustainable Transport:

The Draft Plan promotes pedestrian accessibility and permeability in residential areas throughout the city and recognises the value of key linkages between housing areas and local facilities and community infrastructure, the public transport network and linkage to the network of walking and cycling routes. The Plan refers to government guidance in particular DMURS and the *'Sustainable Residential development in Urban Areas'* and the accompanying *'Urban Design Manual – A Best Practice Guide'* setting out a range of design principles to consider in the layout of residential areas including achieving good connectivity and permeability. While audits can be used to identify walkability, it is not considered however appropriate to single out this particular document and include as a Development Plan policy. It is recommended that the Draft Plan should be amended to include reference to the National Transport Authority document- *Permeability in existing Urban Areas, A Best Practice Guide (2015)*

With regard to rat running and through traffic within residential neighbourhoods, it is implicit in the neighbourhood concept in chapter 2 that such practice does not contribute to a successful, safe and accessible neighbourhood. The principles set out in this chapter are designed to preclude such activities with priority for sustainable transport, reduction in traffic movements and the design of streets to have important public realm function as opposed to merely a movement function. With regard to the village envelopes/areas, the preparation of specific area plans will inform the need for appropriate traffic management measures in these areas.

With regard to access corridors and school routes, these would be required to be specifically identified and designated, and lands reserved as appropriate.

While the reduction in car travel and a move to sustainable transport modes is a key policy of the Plan, *car-free neighbourhoods* are considered premature. Such neighbourhoods are not part of NTA or any national policy and have not been included as part of the GTS. Proposed environmental improvement schemes for different neighbourhood areas of the city aim to make improvements in the public realm to encourage reduction in traffic speeds and volumes in these areas.

Village Envelopes:

The Menlough Village envelope extent is based on the historical pattern of development and is designated as a village in recognition of its distinctive character. The extension of the boundary to allow for a release of land for housing would be wholly inappropriate and would erode the character of the village. This area is also unserved and other than cases of sensitive infill in the village envelope, housing should be directed to serviced housing land areas.

A specific objective in 2.12 is to develop best practice advice for the design of homezones. In addition Section 2.5 and chapter 11, section 11.3 gives guidance on achieving good open space design. Government guidelines, in particular the *Sustainable Residential Development Guidelines* and the accompanying *Urban Design Manual*, give detailed guidance in this regard.

Other:

The policy to have bilingual signage across the entire city is considered appropriate in the context of the objective to establish the status of Galway City as a *Bilingual City*. The requirements for directional signage in the Gaeltacht parts of the city are required under specific legislative requirements.

A specific policy to support housing development along the railway line to Oranmore would not be appropriate as certain areas along the railway line are deemed more suitable for other land uses, some lands are not suitably serviced or have amenity functions and are outside of the jurisdiction of Galway City Council.

Policy 2.2 Housing Strategy gives support to Approved Housing Bodies (AHB's). Within this context the development of specific types of housing/communities and citizen initiatives are facilitated.

Bohermore is located within an Inner Residential Area as defined in section 2.7. While it is considered that adding the single storey houses in Bohermore to the RPS is not merited, their redevelopment for 4 storey height may not represent the optimum development in this area. In this case a balance between the protection of the character of the area and its sustainable development is required. Policy 2.7 is considered a reasonable policy seeking to protect the quality of inner residential areas by ensuring that new development does not adversely affect their character and has regard to the prevailing pattern, form and density of these areas. Any proposals for development will be assessed on their merits having regard to this policy.

The Plan recognises the need for local service and community facilities in residential neighbourhoods and the Council, through zoning objectives, will encourage a range of facilities of a scale appropriate to serve the local community. It is implicit in chapter 2 that housing and accommodation will be considered in a holistic manner.

With regard to residential extensions, exempted development restrictions are dictated by Planning legislation. Any Planning applications for extensions will be considered on their merits having regard to development standards. In many cases, the Planning Authority have considered a relaxation in standards such as in older neighbourhoods, where dwellings and back gardens are small and where an extension ensures the continued sustainable use of the dwelling as a family home.

With regard to infill development on residual open space, Chapter 2 in section 2.6 refers to areas in the city with open spaces that do not contribute to the urban structure and where infill development could create benefits to the community. Residual open spaces can be valuable for passive recreation, act as buffers, biodiversity areas and wildlife corridors.

The Plan structure and process is dictated by legislation, with extensive consultation and consequent adoption by the Elected Members. Consultation with the public is a significant element of all Planning processes and is statutorily provided for, it would not be appropriate to include a statement that all Planning should be carried out in consultation with residents. Inevitable proposals for projects both public and private, other than minor works require consents that accommodate third party views.

Rezone R/LDR to CI:

A number of submissions seek rezoning of R zoned land to CI zone in order to reflect the existing established commercial use of the land eg, the Lidl site in Doughiska, Clayton Hotel and a property at Lower Salthill. It is not deemed necessary as the R zoning does not preclude the existing local commercial uses. The land use zoning objective in the plan is to protect residential amenity, allow for associated uses and to allow uses that contribute to sustainable neighbourhoods. In this regard

residential zoned lands can accommodate commercial uses and the Development Plan supports commercial uses without the requirement to change the zoning. With regard to the existing commercial centre at Lower Salthill, this type of development is fully supported by the existing residential zoning which allows for the development of local service areas of this nature.

In the case of the Clayton Hotel, it is not considered appropriate to increase the plot ratio in view of the prevailing pattern of development in the vicinity the existing development on site demonstrates how successful the current standards have been to allow for scale. With regard to flexibility in plot ratio, these standards are flexible up to the maximum 1.25 for CI zones and subject to specific requirements set out in section 11.9.2.

With regard to rezoning of R lands to CI use along the Tuam Road, at Parkmore (sub.65), there are already sufficient lands zoned for commercial purposes in the city. To allow for re-zoning of this site would be wholly unsustainable and haphazard.

With regard to the Lidl site in Doughiska, the line of the proposed cycleway can be moved marginally on the map to be located along the northern boundary. The map references that all such objectives are indicative and not exact.

Rezone R to CC:

With regard to rezoning R land to CC zone, namely on the site of former Anglo Bank premises, Foster Street, this site is part of a block of R zoned land and is surrounded by existing residential development. It would not be appropriate to isolate this site and rezone for City Centre use. Such a rezoning could unduly impact on the amenities of the greater residential block. R zoned lands can accommodate some commercial uses such as that which already exists/existed in the building. An inter change for similar office type uses most likely could be sustained and from consultation there appears to be significant unmet demand for additional office space in the city centre.

Rezone R to CF:

With regard to requests by NUIG to rezone from R to CF the new vehicular access at Newcastle Road to reflect the existing use as access to university, it is deemed acceptable and in the interests of proper planning and orderly development, to rezone the entrance and to consolidate the CF zoned lands associated with the university. Similarly it is also recommended that the site of the Martin Ryan Institute Annex be rezoned from R to CF to reflect the existing institutional use of the site. (See Amendments A11.7 and A11.8)

Rezone R to RA:

With regard to a request to rezone land from R to RA at Dun na Mara, it is considered that Renmore is well served by extensive tracts of RA zoned lands, in addition to having an attractive beach located nearby, no change in zoning is recommended. This land has been zoned for residential use over a number of development plans; it is not being introduced in the draft plan. The referenced lands are associated with planning application for residential development granted by the City Council (15/328) and subsequently appealed to An Bord Pleanála (no decision to date).

Rezoning of LDR to R:

With regard to a request to rezone land from LDR to R along Circular Road, no change in zoning is recommended. This land is a small infill site which is part of a larger area of LDR zoned land with an established housing character and pattern of development.

Change LDR zoning:

With regard to the request to change LDR zoning in Menlo Village envelope which is part of the Lough Corrib cSAC, no change in zoning is considered necessary. Section 11.8 and section 11.31 sets out standards to ensure that any development projects adhere to the requirements of the Habitats Directive and Policy 4.2 also ensures compliance with the EU Directive.

Change LDR zoning:

It is considered appropriate to zone LDR lands at Doughiska (A11.10). These pockets of land have significant merits over other lands for re-zoning. They meet the sequential approach adjacent to existing R zoned lands to the north. They are serviced and are well served by roads, footpaths and public transport.

Recommendation:

Proposed amendments relating to this Chapter include Amendments No's:

- A2.1,
- A2.2,
- A2.3,
- A2.4,
- A11.7,
- A11.8,
- A11.19,
- A11.20,
- A11.25,
- A 11.26

Chapter 3 Transportation

Summary of Issues Raised

Sustainable Transport:

- Insert new policy under Policy no. 3.4 Cycling and Walking to support sustainable travel in the tourism sector by the promotion of public transport use, through the Public Bike Scheme and by undertaking enhancements to the public realm and overall accessibility of the city thereby making it easier for visitors to navigate the city.
- Promotes a range of sustainable transport measures and protection of natural habitats in the Castlegar area/city.
- Lack of investment nationally for sustainable land use and transport planning.
- Solutions to reduce car dependence in city include car sharing, improved bus services, provision of commuter rail, redevelop Ceannt Station as multi-modal public transport interchange, light rail/tram system, building GCOB, congestion charges, marketing, and park & ride sites at edge of city.
- GTU have not recognised the need to develop a roads transport system which prioritises sustainable transport modes.
- Highlights the importance of Electric Vehicles (EVs) infrastructure as an enabler of large scale wind energy projects. The ESB will continue to work with the Council as appropriate to ensure the establishment of EV infrastructure and supports Policy 3.7 and Section 11.10.1 of the Plan.
- Support of the inclusion of sustainable transport policies and objectives including the greenway network.
- Support initiatives to promote active and safe travel in Policy 3.2 Land Use and Transportation
- Incorporate finding of existing research on the Health Impacts of Transport and commit to supporting HIA in proposed developments and projects.
- Ensure the Plan facilitates and supports the implementation of Galway City Walking and Cycling Strategy, Galway Sports Partnership Strategic Plan (2016), and Irelands National Physical Activity Plan (2015) and WHO Physical Activity Planning Guide for Cities
- Amend the strategy to include to Support and facilitate in conjunction with other agencies a modal change from the private car to more sustainable modes of transport, namely walking, cycling and public transport.
- Under Public Transport (Page 46) change text in relation to provision for bus shelters on all routes to include in conjunction with stakeholders.
- Insert text from existing plan to facilitate the provision of public transport and sustainable transportation facilities.

N6GCTP/IMTP:

- Supports an effective public transport system for Galway and opposed to N6GCTP.
- Galway County Council, as lead authority for N6 Project, requests the update of specific objectives for N6 Galway City Transport Project and if deemed necessary the NTA transport strategy.
- Review Chapter 3 to update status of N6GCTP and include as a strategic goal in the Core Strategy *to support the development of a transport solution to the existing congestion on the national and regional road network in Galway Gateway and environs.*
- Include the N6GCTP preferred route corridor on all maps, remove underlying zoning objectives and include clear written objectives to support and facilitate the project.

- The proposed route corridor of N6GCTP will have a significant adverse impact on the university notwithstanding Development Plan policy to support the university.
- The N6GCTP should retain existing access arrangements to Knocknacarra District Centre.
- Improve public transport and road network including new bridge and by pass.
- Update Policies in Chapter 3 to take account of the Transport Strategy. Omit 'other measures' from Policy 3.2. Revise policies and objectives in relation to reference to RTRs, location of potential public transportation hubs, statements and policy seeking to facilitate commuter rail services with stops within the city, references to locations for park&ride facilities, parking provision in the city centre,
- There is little information provided regarding proposed improvements in the provision of public transport and in order to address this issue, the ITMP which should be progressed in liaison with the road solution of N6GCTP.
- Insert a specific objective in section 3.9 public transport that the DOS for Planning & Transportation will be responsible for ensuring that an updated Public Transport Feasibility Study is included in the ITMP and give regular progress updates to the Council members and public.
- Need for policy in Plan to develop an expanded Galway City & County Transportation Unit.
- Support the requirement for the N6 Galway City Bypass in order to improve access to & from the Gaeltacht both for economic development within in the Gaeltacht and to allow Gaeltacht residents to travel easily to and from work.
- Considers that following are among some of plans policies/ objectives that pose particular risks to European sites and suggests that omit or reword *Policy 3.3: Continue to progress a sustainable transport solution for the city through the implementation of measures included in the Integrated Transport Management Programme (ITMP) and Specific Objective 3.9: Prepare an Integrated Transportation Management Programme (ITMP) for the city in conjunction with the NTA, Galway County Council and other relevant state agencies.* DAHG suggest that in the absence of the detail of the ITMP and its NIS (or NIR), these should be omitted or reworded, or plan preparation should await the availability of the ITMP and its NIS/NIR. Proposed ITMP include a new road that traverses SAC areas and cycleways that are to be developed within European sites, meaning that it cannot be excluded that each component on its own, and in combination with other plans and projects, will have adverse effects on the integrity of a European site.

Bus:

- Promote a city bus rapid transit (BRT) system with regional connection.
- Include under Policy 3.5 Public Transport a new policy to support and facilitate greener public transport vehicles.
- A frequent direct bus service between the West and East of the City over the Quincentenary Bridge should be provided.
- Insert specific objective in section 3.9 public transport that the DOS for Planning & Transportation will be responsible for ensuring a direct bus service is provided between the city's residential areas in the West and the employment centres in the East and that the DOS will provide the Council members and public with a bi-annual update on this objective until it is achieved.
- Provide bus stop on Sea Road.
- Identify and map sites for tour bus parking.
- Upgrade access from Menlo Road bus stop into Castlelawn Heights and extend footpaths in the estate.
- The Plan should clarify that rapid transit is defined in terms of service frequency not vehicular speed.

Cycling:

- Insert new policy under Policy 3.4 Cycling and Walking to support and facilitate the free carriage of bicycles on all public transport.
- Reinforce Policy 3.4 on extension of bike scheme.
- Support expansion of Bike Scheme but omit the reference to potential locations (Salthill, NUIG, GMIT) for new bike stations.
- Consider cross city public transport and extension of city bike scheme to Blackrock and GMIT.
- Amend text in relation to the Public Bike Scheme to include implementation of the recommendations of the Jacobs Report (2011) by implementing two-way access to cyclists on one-way streets.
- Consider under Policy 3.4 Cycling and Walking policy that builds on the work already undertaken in relation to auditing of walking and to develop and implement an improvement plan for cycling.
- In section 3.4 Cycling and Walking additional wording is proposed requiring the council to *adopt a 'level of service' approach for promoting walking as a form of transport. Important pedestrian origins and destinations will be identified along with the most direct routes and networks required to link them. A desired target walking time or speed will be established and used to identify sources of delay to pedestrians. Delays may be due to travel away from direct routes and delay will include time spent diverting from the desired and obvious line of travel to find a pedestrian crossing. Maximum ceilings will be established for the delay experienced by pedestrians at desired crossing points and also but not merely at, pedestrian facilities. The level of service will include requirements for street lighting and passive and active security. The necessary treatments to improve service will then be implemented through changes in traffic management, traffic calming, pedestrian crossings, provision of street lighting etc.*
- In relation to Smarter streetscapes, insert additional wording that Shared streets will be favoured over further pedestrianisation in order to facilitate other vulnerable road users such as cyclists.
- In relation to connectivity and permeability insert additional text to undertake a 'retrofit improvement scheme' of older developments in order to provide maximum connectivity and permeability for pedestrians and cyclists
- Amend text in relation to cycle infrastructure to include the Hierarchy of Solutions in the National Cycle Policy Framework and to provide cycle parking facilities throughout the city to cater for 20% of commuters arriving by bicycle.
- Insert text to remove one-way streets and discourage the use of one-way systems within private developments.
- Insert text to develop the established network of walking and cycling routes linking key destinations to encourage more active commuting and leisure trips and a network of connector and amenity routes by utilising the existing network of boreens and country lanes.
- Insert text from existing plan requiring that where a road has been assessed having regard to the statutory and national guidance requirements (including the hierarchy of solutions in the National Cycling Policy Framework) and a need identified for such treatments as hard shoulders or on road cycle lane, such treatments shall be a minimum width of 2 metres.
- Insert text requiring an audit of traffic calming features, pilot shared use road markings, yield to cyclist signage at roundabouts and pinch points and detection sensors at all junctions in the city to recognise bicycles.

- Require sheltered cycle parking to match the predicted occupancies for each unit and a minimum of one cycle parking space per residence to be provided for visitors located within the residential units or the associated curtilage.
- Require specific standards for cycle parking facilities at work places and visitor cycle parking.
- Remove objective to provide motorcycle parking facilities at appropriate locations in the city.
- In relation to *Policy 3.8: Galway Port and Other Transport Facilities – Support the future viability of Galway Port including proposals for development and extension of port facilities and an extension of the rail line to the port* highlights that proposed harbour development is currently under consideration by An Bord Pleanála in the context of Article 6(4) of the Habitats Directive
- Considers that following are among some of plans policies/ objectives that pose particular risks to European sites and suggests that omit or reword *Provide cycleways along the following routes: From the City Centre to the eastern city boundary having regard to the Galway to Dublin Cycleway; From the City Centre to Bearna; From the City Centre to Moycullen* to indicate that suitable routes for such cycleways will be explored, taking ecological constraints, the likely effects on European sites in view of their conservation objectives, and in combination effects of other plans and projects into account.
- Considers that following are among some of plans policies/ objectives that pose particular risks to European sites and suggests that omit or reword *Construct a new pedestrian and cycle bridge on the piers of the Old Clifden Railway Line from Waterside to NUIG* to indicate that a suitable option for a bridge will be explored, taking ecological constraints, the likely effects on European sites in view of their conservation objectives, and in combination effects of other plans and projects into account.

Pedestrian facilities and Pedestrianisation:

- Improve pedestrian facilities in the interest of health, safety and well being in particular at roundabouts/junctions linked to programme of implementation of timed improvements.
- Redevelop traditional right of way from Headford Road into Castlelawn Heights and link to the Dyke Road cycle ramp.
- Insert new policy in Policy 3.9 to support the provision of accurate and easy-to-use information within the public realm including: Delivery of way-finding information both on-street and web based at focal points including public transport interchanges; at cultural/tourist hubs; along key visitor streets including Quay Street, Spanish Arch, Canal Walk and Salthill Promenade, at City Bike stands, Eyre Square and public spaces; Work with Galway Tourism Office Network for the provision of visitor information; Work with the NTA on the provision of symbolised transport information (particularly public transport information) for tourists.
- Deficient safe road crossing and public transport services are leading to car based school transport.
- Lack of permeability and central core area in housing estates.
- Consider under Policy 3.2 Land Use and Transportation policy to conduct a walkability audit of the city. Such audits have been carried out elsewhere by Age Friendly Ireland and provide evidence of features of roads and streets that can prevent people with a wide range of abilities from easily accessing and using local amenities.
- Insert requirement to undertake a ‘safe routes to school’ programme of works
- Requests replacement of text in relation to pedestrian development and to (Page 47) carry out a permeability audit to improve pedestrian linkage.
- Develop the established network of walking and cycling routes linking key destinations to encourage more active commuting and leisure trips.

- Develop a network of connector and amenity routes by utilising the existing network of boreens and country lanes

Parking and Park& Ride:

- Amend objective for park and ride sites at strategic locations in the city to include their provision as part of a coherent plan led strategy as opposed to identifying sites on a piecemeal basis.
- Attract people to the West area through reduced parking charges, installation of a Bike scheme docking station and improved signage to the West.
- Review car parking charges and parking management in the West.
- Remove car parking from Woodquay and replace with pedestrian friendly environment.
- Recommends an increase in parking standards for post primary and primary schools. Recommends an increase in off-street car parking spaces for larger houses.
- Reduce the number of car parks in the city centre and reserve Eyre Square for the use of buses, light rail and taxis only.
- Workplace transport management plans should be sought where business seek additional car parking spaces.
- Reduce on-street car parking by 5% per year as it results in increased traffic and less road and footpath space and impacts on movement of pedestrians, cyclists and motor vehicles.
- A percentage of the removed on-street car parking spaces to be dedicated to disabled bays, bicycle parking and alternative uses.

Rail/Light Rail:

- Revise Policy 3.5 Public Transport to include reference to suburban commuter rail.
- Include under Policy 3.5 Public Transport a new policy to support and facilitate a light rail system for Galway and the full opening of the Western Rail Corridor.
- A new transport assessment of the best long term public transport solutions for Galway City should be provided and light rail should be fully considered as a long term option with cost benefit analysis using longer time frames.
- Supports the provision of a GAL-TRAM in the city.
- Requests Members to seek greater government investment in rail, light rail and bus services for Galway.

Road Network:

- Retain and improve connections across the river to the West.
- Requests that the proposal to create new entrance at Merlin Park House be reviewed, the bus corridor should not be provided through hospital grounds but along Dublin Road.
- Omit objective to 'Facilitate a new access to Merlin park Hospital from the Dublin Road at Galway Crystal', and replaced with 'Redesign current entrance to Merlin Park Hospital to make it safe and include traffic lights, thus avoiding the destruction of South Merlin Woods and the Merlin Woods meadows – both areas of significant amenity and biodiversity.
- Omit objective to facilitate a new Merlin Park Hospital access and replace with an objective to move the current entrance 50m so that South Woods and South Meadows can be protected in the interests of biodiversity and amenity.
- Omit objective to continue widening and improvements on Coolagh Road, Quarry Road and Monument Road.
- Insert text to preserve the character of country roads and the breen network and to compile an inventory of boreens and a plan to preserve and restore their character.

- Retain text of existing plan to recognise the difficulties posed by roundabouts for cyclists and pedestrians and is committed to addressing this issue by taking whatever appropriate steps as are necessary.
- Implement junction upgrades at the Deane Roundabout, Skerritt Roundabout, Martin Roundabout, Joyce Roundabout to provide for pedestrian and cycle movement and to facilitate public transport.
- Include under Policy 3.6 Road and Street Network and Accessibility a new policy to support and facilitate the full replacement of roundabouts with signalised junctions.
- Remove objective to implement road widening and improvements at Bothar na gCoiste.
- Implement strategic road closures to motorised traffic to prevent rat-running.

Traffic Management:

- Carry out road improvement and traffic calming measures on the old Monivea Road from the junction at McGreals to junction at Coynes.
- Reduce traffic congestion by instigating a one way system in the West area as previously proposed in late nineties
- Enforcement of speed limits is required in Castlelawn estate.
- Impose a one way traffic system in the area and include bike scheme docking station in The Small Crane and bus stop on Sea Road.
- Serious concerns with regard to any vehicular restrictions on Francis Street. Requires vehicular access to their property and seeks consultation in advance of any proposal to alter transport proposals for Francis Street.
- Require a speed management strategy for Galway city.
- Require a Heavy Goods Vehicle (HGV) Management Strategy.
- The requirement for a freight management strategy should be expanded to included restriction to designated roads and times.
- In section 3.6 Road and Street Network and Accessibility insert text to implement 30km/h speed limit as the default for the city centre, residential and non-arterial urban roads.
- Require that children are given better conditions for walking, cycling and accessing public transport for the entire journey from home to school through 30km/h speed limits as the default for residential and non-arterial urban roads, and streets in the vicinity of schools.
- Text should emphasise a community-wide approach to road safety for children, facilitating active travel not just in and around residential estates, but also between residential areas and schools.
- In section 3.7 Mobility Management and Parking submission additions to the text requested to include retrofit traffic calming schemes in older developments.
- Require new industries to provide mobility plans.

National Guidelines:

- Reference is made to DECLG Spatial Planning and National Roads Guidelines which requires objectives to retain lands required for national roads projects free from development and require that measures are put in place to ensure that adjacent development is compatible with the construction and long term operation of the road.
- Include reference to the DECLG Spatial Planning and National Roads Guidelines (2012) in Section 3.6 and a commitment to accord with its provisions.
- Local area plans should include for strategic traffic and transport assessments and applications for development of employment areas close to the national road network should accord with the Traffic and Transport Assessment Guidelines 2014 in relation to preparation of TTAs (Traffic and Transport Assessments).

- Include in the plan a clear policy statement from the retail planning guidelines that there is a presumption against large out of town retail centres located adjacent or close to existing, new or planned national roads/motorways.
- Include in the plan reference to restriction of new access points or intensification of existing access points on the national road network outside the 60kmh as required by the DECLG Spatial Planning and National Roads Guidelines (2012).
- Include reference to Road Safety Impact Assessment (RSIA) and Road safety Audit (RSA) standards which must be addressed in the design of roads and road schemes.
- Reference to the TTA guidelines are welcome and should be incorporated into a separate section as opposed to within the section on car parking requirements. Reference to TTAs should also be included in Chapter 3.
- Monitor and implement the land use and transport provisions of the RPGs including curtailment of car based commuter development into the city.

Other:

- Consider inclusion in section 3.7 that appropriate mobility management and travel plans be incorporated into any LAP framework and planning applications for employment uses.
- Development Plan should promote 'healthy-weight' environments.
- Insert policy to provide signs on street.
- Plan and its objectives should be more SMART (Specific, measurable, achievable, relevant and timed) and therefore more achievable within set timescales under the responsibility of specific officials.
- Annual monitoring of objectives should be undertaken- Objectives should be numbered rather than bullet pointed.
- Commission a report regarding transport access into the city core.

Response:

A range of issues in relation to transportation have been raised in submissions made to the Draft Plan. As with the pre Draft Plan and previous plan consultations, transport was a topic of considerable interest. Consequent on the preparation of the Galway Transport Strategy (GTS) and work carried out to date on the N6 Galway City Ring Road (N6 GCRR) project, it is proposed to amend Chapter 3 of the Draft Plan in its entirety. The proposed amendment accommodates the GTS and the N6 GCRR and includes specific policy support for all transport measures proposed in the GTS. It is also proposed to amend all associated mapping to show the strategic measures associated with the GTS including public transport, walking, cycling and the new strategic road corridor (N6 GCRR).

The measures included in the GTS and given specific policy support in the proposed amendment Chapter 3 will address many transportation issues raised in the submissions.

Cumulatively the components of the GTS, which includes the need for a ring road, such as that being proposed in the N6 GCRR project, will relieve congestion in the city and in turn improve the quality of the city environment and increase opportunities for, and the quality and experience of, public transport, walking and cycling. The proposals in the GTS seek to reduce car dependency through the combined increased capacity of a modern, high quality public transport system in conjunction with the delivery and promotion of a core and feeder cycling network and an attractive prioritised pedestrian network.

Sustainable Transport:

With regard to sustainable transport, the proposed new Chapter 3 incorporates measures outlined in the GTS and specific policy support to promote walking and cycling. As part of the GTS, a high quality, dedicated cycling network is proposed including measures to give priority to cyclists, encouraging commuting, leisure and local trips.

With regard to investment, the measures outlined in the GTS will be linked to a 20 year implementation programme which will allow for funding applications in particular to the NTA for phased implementation based on priority needs. The GTS builds on previous work and studies including the Walking and Cycling Strategy but advances the transport planning to a more strategic and integrated approach. It also takes into account of national and regional advice and guidelines.

Policy support is included in the proposed Chapter 3 to support provision of bus shelters (specific objective 3.10) and also for smarter technologies which will improve the passenger experience and convenience. In practice these measures are done in consultation with stakeholders such as with the bus providers and the NTA, therefore it is not considered necessary include specific wording regarding stakeholders.

With regard to Health Impact Assessment, commitment to undertaking HIA of transport projects can only be given if it becomes a mandatory requirement. Regardless the promotion of sustainable measures which forms a significant part of the GTS will inevitable contribute to a healthier lifestyle.

N6GCTP/ITMP:

Submissions express both support and concern with regard to the N6 GCRR (formerly the N6GCTP). While concerns are raised with regard to the N6 GCRR, the analysis and transport modelling assessment carried out as part of the GTS affirms the need for a strategic ring road incorporating a new river crossing to enable the delivery of the public transport and sustainable transport measures. Public transport measures alone have been deemed incapable of delivering a solution to the specific, significant problems associated with transport in the city. The problems will only be further exacerbated by additional future demand unless addressed now.

The preferred route corridor of the N6 GCRR is included on the proposed amendments map. It is not considered appropriate at this stage to remove underlying zoning objectives, however clear policy support is included in the amended Chapter 3 including specific objectives in section 3.10 to give priority to the reservation of the *NCGCRR Preferred Route Corridor* and the associated land requirements.

The ITMP is no longer an appropriate title and is superseded by the GTS. Elements of previous transport policy and proposals which have not been brought forward in the GTS have been removed from the amended Chapter 3 and associated mapping. These include Rapid Transit Routes and Quality Bus Corridors.

With regard to transport updates, progress reports are presented to the Council on a quarterly basis. All strategies, policies and specific objectives of the Plan and proposed amendments are subject to screening for SEA and Appropriate Assessment to assess their impact on the environment including the European sites.

The staffing structures in Galway City and County Councils for implementation of transportation measures are not a policy matter for the Development Plan and would be dependent on relevant budgets and central government funding. In practice both Councils work together on projects and in

certain cases one authority will take the lead responsibility which can be facilitated under Local Government Act (section 85 agreements). The GTS and the N6 GCRR are examples where both authorities are taking into consideration the transport needs of both the city and county.

Bus

The proposed amendment to Chapter 3 incorporates the measures outlined in the GTS for an improved public transport system in the city. The GTS recommends the provision of a high quality, high frequency bus service for the city and environs as being the most appropriate form of public transport provision. This is to be based on a network with 5 specific routes anticipated. The routes will serve the major trip attractors and will operate cross city with convenient opportunities for transfer between services, designed at key locations. Eyre Square is designed as the primary location for interchange.

As part of the GTS, use of the Quincentenary Bridge for bus crossing was assessed but was not considered to be the optimum link, a cross city link along University Road onto Eglinton Street and Eyre Square was considered the preferred option. Bus stops will be linked logically with the network of the 5 routes across the city.

This cross - city link is the primary focus for the implementation of priority measures such as bus lanes and the removal of pinch points and delays. It will require traffic management measures as already referenced to be implemented in conjunction with the removal of through traffic from the city centre. To maximise the range of destinations served, convenient opportunities for transfer between services are designed at key locations with Eyre Square as the primary location for interchange.

Parking for tour buses is accommodated and specifically identified in the proposed amended Chapter 3 at Merchants Road and the Cathedral. Other sites will be identified having regard to the tour bus parking study.

Cycling:

A wide range of issues have been raised in submissions with regard to cycling. The GTS which is incorporated into the proposed amended Chapter 3 gives significant emphasis to the delivery of an integrated, safe, convenient cycle network. This is supported through policy support and specific objectives propose measures which will increase opportunities for and the quality and experience of cycling in the city, enhancing safety and convenience. Specifically a network of primary and feeder cycleways are proposed together with two greenway cycleways extending from Oranmore to Bearna and north to Maigh Cuilinn. Where possible the proposed routes are fully segregated from motor traffic. In other locations the network includes on-road cycle lanes and /or wide bus lanes to that may also be able to cater for both buses and cyclists along the same route.

Together with modifications proposed to the traffic network and improvements to the public realm, the uptake of cycling as both a commuter option and recreational option will be greatly encouraged and the experience of the user much enhanced.

As in the Draft Plan, the proposed amended Chapter 3 recognises the need to provide sufficient bike parking and includes a policy and specific objectives to provide cycle parking at various locations.

Cycle parking standards are set out in section 11.10.2 and includes for sheltered parking. The Draft Plan continues to support the provision of motorcycle parking facilities at appropriate locations in the city.

A number of submissions request detailed specific requirements for cyclists such as lane treatment, yield signage and detection sensors. It is not appropriate for a Development Plan to include reference in this regard. This would form part of specific design proposals at project stage and is better addresses in this manner to allow for flexibility.

Pedestrian facilities and Pedestrianisation:

Many of the issues raised in relation to walking are addressed in the GTS and consequently included for in the proposed amended Ch. 3. The GTS has recognised the need to increase walking as a transport mode in the city and give priority to the pedestrian network and the associated environment. This will include reducing vehicular traffic in the city centre core and making correspondingly make improvements to the public realm including permeability.

Emphasis will also be given to increasing permeability within suburban residential areas, improving the pedestrian networks, making them safer and maximising pedestrian accessibility to the public transport network. These measures will contribute to a reduction in car dependency.

The GTS also includes for measures to increase connectivity and permeability within and to places of employment in particular the Business and Technology parks on the east side of the city at Parkmore and Ballybrit. These aspects are now included for in the proposed policy revisions to Ch 3. For example policy is included to support and promote initiatives such as *Park and Stride*, *Green Schools Programme* and the concept of having safe routes to school.

The proposed amended Chapter 3 also includes a policy to promote the implementation of a Wayfinding Scheme with provision of directional information and signage at appropriate locations across the city as part of a greater objective to prepare a specific Public Realm Strategy.

Parking and Park & Ride:

The proposed amended Chapter 3 has incorporated the approach as provided for in the GTS which includes for measures to promote 'park and ride' at various locations in the city, not implemented as standalone facilities but integrated with the proposed public transport network and planned for in conjunction with the likely bus patronage and therefore more likely to be successful.

With regard to car parking, Chapter 3 proposed amendments includes supporting policy to reduce on street car parking in the city centre and encourage a revised pricing structure as recommended by the GTS. These measures can increase the attraction of opting to use public transport, walking or cycling.

Increases in parking standards are not deemed appropriate for schools and/or larger houses. Travel and mobility plans are considered appropriate for schools which would encourage sustainable travel measures such as car sharing, walking cycling and use of public transport. With regard to larger houses, an increase in parking requirements is not considered a sustainable option and the current standards are considered to meet most needs.

Mobility Management and Travel Plans:

The amended Chapter 3 includes policy support in section 3.8 for mobility management and travel plans. An amendment is also recommended in Chapter 11 setting out requirements for travel plans (see A11.13).

Rail/Light Rail:

Some of the submissions requested the inclusion of this type of public transport option for the city to be included in the Draft Plan. The GTS following examination has determined that light rail is not an appropriate option as part of the transport solution for the city currently, taking into consideration the existing and predicted population and the prevailing density patterns. Transport modelling has been carried out as part of the GTS to look at the possibility of the economic feasibility of bus based or light rail-based options along the busiest corridors in the city. Modelling indicates that a light rail service would provide capacity far in excess of what is practically required. Therefore when considering the costs to build and operate light rail at the same frequency as a bus based transport system, the GTS clearly concludes that bus-based public transport represents the most appropriate and viable public transport system for the city.

The proposed amended Chapter 3 includes policy to support the potential for possible future rail stops in the city along the existing rail line. This option will be linked with demand and feasibility.

Road Network:

The proposed amended Chapter 3 and associated mapping retains the objective to facilitate a new access to Merlin Park Hospital. This access is considered the preferred access point and has already been assessed and invested in to date. It will also include for an on road bus route through the hospital and along Merlin Lane which makes it an efficient objective.

Objectives for road improvements are also retained as these are part of the overall general programme of improvement works for roads in the city.

Certain roads within the city are likely to require widening and improvement to cater for safety for all including pedestrians and cyclists, to comply with national standards and to accommodate the expansion of the city through intensification of development. It is not therefore appropriate to include for their preservation as this could prejudice these needs for safety and proper standards for all. There are a number of boreens in the city which have been designated RA greenways and also a number of rights of ways. These will continue to reflect an amenity function. An inventory of boreens as requested maybe more appropriate as an action of the Heritage Plan in view of their historical value.

Junction upgrades are proposed for the remaining roundabouts along the existing N6 corridor. Upgrades will be considered having regard to all users and safety and efficiency requirements and in the context of the GTS measures.

Traffic Management:

Proposed measures set out in the GTS for a cross-city link which includes Francis Street will have vehicular restrictions but will be designed to allow for local access. The GTS recommends that the introduction of lower speed limits should be examined for the city centre and residential areas in conjunction with the relevant authorities. This is incorporated into the proposals in the amended Chapter 3.

With regard to HGV management, the proposed amended Chapter 3 has included a specific policy to implement the GTS proposals for a HGV management strategy and a loading and delivery strategy in the city centre.

National Guidelines

Reference to various national guidelines such as Spatial Planning and National Roads Guidelines (2012), Traffic and Transport Assessment Guidelines 2014, Road Safety Impact Assessment (RSIA) and Road safety Audit (RSA) will be included in the Development Plan.

The preparation of Local Area Plans will include for appropriate traffic and transport assessments (TTA's). It is not considered necessary to refer to the presumption against large out of town retail centres near national roads/motorways as outlined in S28 Retail Planning Guidelines as appropriate reference is given to these Guidelines in the Plan and the relevant retail hierarchy and policies do not accommodate such locations.

Reference to the TTA guidelines will be re-organised to be incorporated into a separate section as opposed to within the section on car parking requirements as requested.

Other:

The provision of signage on streets is an operational matter and not for the Draft Plan. However policy in relation to bilingual signage is included in the Draft Plan.

With regard to incorporation of "healthy weight" environments, it is proposed to amend Chapter 4.1 to include a support for the *Get Ireland Active: A framework for improved Health and Wellbeing, 2015-2025 (DH and DTTS) (A4.7)*.

The request that the Plan and its objectives should be more SMART (Specific, measurable, achievable, relevant and timed) and therefore more achievable within set timescales under the responsibility of specific officials is noted. While timescales are attached to some objectives and projects, in many cases this is not possible as implementation is very much resource and funding dependant. With regard to monitoring, a progress report on the implementation of the Plan is required after two years of adoption of the Plan. The request for numbered objectives as opposed to bullet points is also noted and all efforts regarding user friend documentation is a normal consideration of the plan production.

The GTS has considered the issue of transport access into the city core and this has been incorporated into the proposed amended Chapter 3.

Recommendations:

Proposed amendments relating to this Chapter include Amendments No's:

- A3.1
- A3.2
- A11.13
- A 11.27
- Other recommended amendments to the Draft Plan also relate to transportation, these include A1.1, A2.3, A2.4, A4.1, A4.3, A4.4, A4.5, A4.6, A5.1, A5.2, A5.3, A6.1, A7.1, A8.2, A8.3, A10.1, A10.2, A10.3, A10.4, A10.6, A10.7 and A10.8.
- Proposed map amendments in relation to transportation are highlighted in A3.2 and are reflected on the Proposed Amendment map.

Chapter 4 Natural Heritage, Recreation and Amenity

Chapter 4 of the Draft City Development Plan addresses natural heritage, recreation and amenity in the city. The overall aim of the chapter is to provide for a green network in the city that allows for the protection, sustainable management and use of natural heritage and biodiversity, parks, open spaces, coast, canals and waterways and recreation amenity areas in an integrated manner. This section seeks to ensure better integration of environmental and natural resource considerations in the Development Plan through the SEA process. The development of the green network will provide a high level of protection for European (Natura 2000) sites taking into account Article 6 of the EU Habitats Directive.

The Chapter includes policies and specific objectives regarding green and blue spaces and protected European sites including the following:

- Green Network
- Parks
- European, national and local sites of ecological importance
- Natural Heritage and biodiversity
- Greenways and Public Rights of Way
- Coastline Area, canals and waterways
- Urban Woodlands, trees and hedgerows
- Child Friendly City
- Views of Special Amenity Value and Interest
- Agricultural Lands

Summary of Issues Raised

RA Zoned Lands:

There are 12 overtures for rezoning of lands from recreation and amenity RA use to predominately residential/low density residential purposes. Requests for the rezoning of land from RA to other land use zones, R, LDR and I totals 25.11ha (62acres).

A/G Agricultural Zoned Lands:

There are 17 overtures for rezoning of lands from agriculture use to residential/low density residential purposes. Requests for the rezoning of land from A/G to R and LDR totals 42.54ha (105.12acres).

Parks & Recreation:

Merlin Park Woods

- Remove objective for new access to Merlin Park at Galway Crystal, Section 3.6. Includes presentation by Friends of Merlin Woods to SPCs in 2013.
- Designate Merlin Park Woods as a statutory nature reserve in view of the ecological importance of the wildlife habitats therein.
- Place a TPO on Merlin Park Woods in order to ensure its future protection.
- Place a Special Amenity Area Order on Merlin Park Woods.
- Prohibit any change of use of Merlin Park Meadows.
- Include reference to the restoration of Merlin Park Woods to alleviate habitat/species loss in Section 4 Natural Heritage, Recreation and Amenity.
- Policy 4.1 Include a new Policy Support the actions of the Merlin Park Woodland Habitat Survey and Management Plan 2009.

- Table 4.3 should include reference to Merlin Park meadows.
- Include policy under Policy 4.2 protect the ecological integrity of Statutory Nature Reserves, refuges for fauna and Annex 1 habitats which are present in Merlin Park Woods.
- Insert under Policy 4.5.3 View of Special Amenity Value and Interest, protection of the Merlin Park south meadows and woodland from development.
- Amend the specific objective in relation to preparation of master plans to include Merlin Woods, Merlin Meadow, Ballinfoile Park and Woodquay plots/old railway embankment.

Terryland Forest Park/ Salthill

- Improve accessibility to Terryland Forest Park and make the park more user friendly.
- Terryland Forest Park requires a Special Amenity Order, similar to Liffey Valley Park and Lagan Valley Park.
- Queries what development, if any, is planned for Salthill Park.
- Move *Terryland Forest Park* from Table 4.4 to Table 4.3.
- Include reference to the Terryland Forest Park Committee and a commitment to its revitalisation.
- Include in Section 4.6.2 that *Galway City Council will promote the establishment of an educational farm in the Castlegar area to the north of Terryland Forest Park.*

Recreation

- Include reference to development of modern rugby stadium in various chapters of the Plan. Changing facilities to be provided at existing sports pitches, including Hazel Park/Laurel Park, Westside, McGrath's Field, Knocknacarra, Cappagh Park as lack of such facilities limits their usage. Provide a flood lit synthetic rugby within the city for year round use.
- City Plan should support the urgent requirement for playing pitches and associated facilities to support hockey. The club has sought lands for a hockey pitch and have made representation in relation to RA zoned lands at Kingston. Support the Specific Objective in Section 4.7 to prepare and implement a masterplan for Kingston RA lands. Shared use of facilities would be agreeable.
- Insert specific development objective on RA zoned lands at Lough Atalia for consideration of sports ground and facilities.
- Include as a specific objective in the Community Spaces Sub section: Medium/Long term to develop adventure playgrounds and outdoor classrooms

Biodiversity/Protected Habitats and Species:

- Welcomes the wide-ranging strategy and policies in the Plan to conserve protect and enhance nature conservation sites, habitats, species, and ecological networks.
- Some of these policies and objectives allow for or promote development and uses, including amenity and recreation uses and associated infrastructure, or other specified or potential developments, or are not clearly protective or mitigatory with regards to Natura 2000/European Sites, e.g. policy 4(1), 4.1(1), 4.1(4), 4.2(10), 4.3(3), 4.3(9), 4.3(13), 4.3(14), 4.3(17), 4.6.2(5), 5.1(16), and 9.3(10).
- Include the ecological constraints mapping carried out for N6 Project in the Development Plan, and include policy to prohibit development in areas recorded to have a high amenity value.
- Enhance biodiversity in housing estates.
- Concern regarding policies and objectives referencing the use and management of ecological sites, ecological networks and green areas for amenity and recreational uses, and, among

other things, commitments to develop cycleways, walkways and other facilities in these areas, and to develop and increase sports and recreational activities in these areas.

- Include reference to the Galway city Habitats Inventory 2006 in the context section.
- Concern that there is no distinction is made between European sites and other green or blue (marine) areas.
- Dry stone wall and hedgerows should be used as oppose to cement block walls.
- Refer to Galway City Habitats Inventory 2005 in Strategy 4.1.
- The strategy should be amended to include the following:
 - Promote development of wildflower meadows in all parks where possible
 - Develop a management plan for all parks and forests with the involvement of local communities.
 - Develop ecological or wildlife corridors.
 - Promote and develop forests and woodlands as *carbon sinks*.
 - Promote, develop and expand forests, woodlands, bogs and wetlands as natural flood defences.
 - Promote and develop forests and woodlands as *Outdoor Classrooms*.
- Amend text of policy 4.1 to enhance linkages and connectivity to include “*to protect and enhance biodiversity*”.
- *Regenerate and restore hedgerows and traditional dry-stone walls in order to recognise their value as areas of high biodiversity and to create a network of wildlife corridors along boreens and other road.*

Community Gardens/Allotments:

- Include under Policy 4.1 Green Network new policies to support and facilitate api-centric bee keeping, urban food gardens, urban agriculture and 'sustainable garden dig your lawn' awards.
- Include under Policy 4.4.1 Green Spaces: Urban Woodlands and Trees a new policy to support and facilitate community trees nurseries.
- Include under Policy 4.5 Community Spaces: Allotments, Community Gardens and Cemeteries a new policy to provide a new separate ecological burial ground for the site or set aside a portion of any cemeteries for ecological burial.
- Consider under Policy 4.5.4 Community Spaces: Allotments, Community Gardens and Cemeteries to support the development of Let's Get Galway Growing Community Gardens Network, other community garden and allotment spaces.

Blue Spaces Coast, Canals and Waterways:

- Insert specific objective for RA lands adjoining the River Corrib to support the provision of water sports facilities.
- No reference to coastal-zone management plan particularly in view of flooding and coastal erosion.
- Develop the coastline rather than its retention as amenity land and use development contributions to fund coastal amenities such as promenades/cycle paths.
- Develop along the east side of the river served by walk/cycle paths and public transport corridor and tram system.
- Insert in table 4,2 Blue Spaces Sandy River and Ballindooley Lough.
- Table 4.2 - Hierarchy of open spaces- rivers and waterways should be amended to include *Barna River, Merlin River, Terryland/Sandy River and Ballindooley Lough*.
- Reserve area at Claddagh Basin and New Dock for traditional boats.
- Include under Policy 4.3 Blue Spaces: Coast, Canals and Waterways a new policy to support a sensitive revitalisation of the Eglinton Canal such as a limited number of small-scale barge hotels, restaurants and homes.

- Accommodate commercial boats, such as cafe boats, ferries, tour boats, within Claddagh Basin and New Dock.
- Repair and reopen Eglinton Canal link between River Corrib and the sea.
- Policies for a 10m buffer beside the River Corrib are welcomed, however it may not suffice as a protective measure, and all plans or projects beside the river, and infrastructural maintenance works, will require screening for appropriate assessment, in order to establish planning requirements.
- Appropriate assessment requirements are likely to arise in relation to the master plan for Lough Atalia and Renmore Lagoon both areas support Annex I priority habitat and are closely linked to the Galway Harbour Extension project.

Public Open Spaces:

- Insert new policy in Policy 4.6.1 Open Spaces: Public Realm to facilitate the on-going use of public spaces within the city to host major public events, priority congregation spaces have been identified (eg. Eyre Square, Fishmarket, Headford Road, Ceannt Station, Inner Harbour, locations to be shown on map) and the Council will ensure these locations can be appropriately managed and have sufficient services and infrastructure to facilitate events.
- Enhance green areas in Woodquay and preserve and expand green spaces in the city.
- Amend Specific Objective 4.7 Green Spaces as follows; Support the incorporation of art sculpture and installation in parks in accordance with the City's Art Plans '*with consultation with local communities*'.
- Insert a specific objective in Section 4.7 short term Green Spaces to provide for recreational and outdoor playing areas, for school and community use, at locations close to existing schools and residential areas.

Greenways/Rights of Way:

- There are 25 objections to the greenway through White Oaks, objections allege that the greenway has potential to attract anti-social behaviour.
- In section 4.4.1 include reference to boreens, hedgerows and traditional drystone walls.
- In section 4.5.1 Greenways and Public Rights of Way - Insert at the end of last sentence in paragraph two *and which Galway City Council will actively promote.*
- Insert text to give *consideration to developing Castlegar Mass Path, boreen to the left of the entrance to Menlo Castle, Carrowbrowne Bog Road and what is known as the Seven Galway Castles Heritage Way as trails for the benefit of leisure cycling and walking.*
- In section 4.5.1 Greenways, Public Rights of Way add Boreens to the title and include in text as boreens and greenway networks.
- Insert section recognising the existence of boreens and the need to preserve them as country lanes.
- Amend objective to develop a strategic citywide coastal greenway from east to west linking with riverside walkways to include links to adjacent neighbourhoods also.
- Insert objective to develop a greenway route under the railway embankment at Lough Atalia to link Renmore, Wellpark, Mervue to the city centre via the docklands and link the same districts to the coastal greenway and preserve a corridor through the docklands and harbour area for the proposed coastal greenway.
- In the specific objectives section replace walkways with greenways.
- Include objective to compile a list of boreens and adopt an action plan to preserve their country lane nature and develop them as a recreational resource.
- Amend specific objective to develop pedestrian and cycle ways along *new alignments away from existing roads* at Knockacarra, Doughiska and Castlegar linking residential with existing and future services and amenities

- Amend the specific objective in relation to riverside walk that - *This walk would be linked to a new pathway from the Dyke Road into the lands of the Terryland Forest Park leading towards the Quincenntennial Bridge entrance.*
- Link estates in the vicinity to the proposed riverside greenway.
- Insert in section 4.5.2 Child Friendly City that the Council will work to ensure that younger children have access to a network of backstreet routes that allow them to avoid main roads for routine journeys and a specific objective to provide children with a network of routes away from main roads.
- Consider under Policy 4.4.1 Green Spaces: Urban Woodlands and Trees supporting the development of walkways, cycling paths, provision of public toilets, water fountains, public seating.
- Amend the specific objective in relation to park at Menlough Castle to include *walking and cycling access in adjacent boreen.*

Other:

- Review annually the Plan to monitor progress of objectives.
- Consider under Policy 4.5.2 Community Spaces: Child Friendly City following: Support the implementation of Galway City Early Years Strategy. Promote a Child-Friendly Environment. Promote vibrant and empowering communities that offer children outlets for physical activity, self-actualisation and positive socialisation.
- In Residential Open Space, amend the primary purpose to include for use for *all abilities.*
- In Agricultural Lands & High Amenity, amend to include *Castlegar, Ballindooley, Dyke Road, Merlin, Menlo, Circular Road.*
- Include Ballinfoile (green) Park in description of View 6.

Response:

Some of the responses to the above issues may overlap because of the integrated nature of natural heritage and recreation and amenity, an aspect highlighted by the green network policy approach of the Draft Plan.

RA and A/G Lands:

RA lands represent a valuable asset both in terms of being a natural heritage resource and also in enabling sustainable recreation and amenity opportunities for the city. RA zoned lands perform different functions in the city including recreation or wildlife and biodiversity corridors within the built-up urban area. Acquisition and development of more RA lands will continue to be an objective particularly as the city develops. In addition agricultural lands, zoned A & G, can contribute to recreation and amenity. These lands form part of a natural backdrop to the built environment. G zoned areas have an important landscape value. RA lands are located adjacent to residential areas and form important natural corridors and green spaces in the city. It is an objective of the Development Plan to retain all RA zoned lands. In view of the removal of the specific objective for the road reservation associated with the GCOB under Variation no. 2 to current Development Plan 2011-2017, made on the 12th January 2015, it is proposed to rezone the former road reservation lands at Ardaun from A to LAP. They are not now part of examination as the emerging option for the subsequent N6 GCRR corridor either. In addition the strategic location of these lands immediately adjacent to the LAP area, large employment area at Ballybritt and the N6/M6 is advantaged. The rezoning of these lands would also rationalise the development land bank associated with the LAP.

Parks & Recreation:

The green network for the city comprises of a variety of parks and open spaces, serving a number of different purposes, throughout the city area, as indicated in Tables 4.2 (pg. 53). Table 4.2 is not an

exhaustive list of parks and open spaces and gives a few examples of different types, sizes and functions of parks and open spaces in the city. Nevertheless it is proposed to insert a reference to Sandy River and Ballindooley in the table. The RA zoning objective allows for all forms of outdoor recreation including sports grounds and ancillary facilities related to and secondary to the primary use of the land.

A short-term objective of the Draft Plan is to prepare master plans for parks in the city in accordance with Recreation and Amenity Needs Study in consultation with local residents, including Barna/Lough Rusheen Park, Merlin Woods City Park (Doughiska RA zoned lands) and Terryland Forest Park. It is considered that issues regarding Merlin Parks Woods and Terryland Forest Park should be addressed during the parks master plan preparation process, which will include consultation with local residents groups and other stakeholders. The designation of Merlin Park Woods as a nature reserve is outside the remit of the Plan. It is not considered appropriate to place a TPO/SAAO on Merlin Park Woods as the park is designated a City Park and a Local Biodiversity Area under Chapter 4 Natural Heritage, Recreation and Amenity, in the Parks Strategy and the City Recreation Amenity Needs Study affording it adequate protection and recognition.

Biodiversity/Protected Habitats and Species:

The green network is a strategic and integrated approach, which seeks to facilitate a good balance between conservation and sustainable development as promoted nationally in the National Heritage and Biodiversity Plans and in the Draft City Heritage Plan 2015-2020 and City Biodiversity Action Plan 2014-2024. The Draft Plan under Policy no. 4.2 Protected Spaces (pg. 55), recognises the need to protect European Sites, national and local sites of ecological importance within the city in order to ensure that the range and quality of wildlife habitats are maintained and biodiversity increased. Policy 4.2 Protected Spaces: Sites of European, National and Local Ecological Importance, seeks to protect European Sites that form part of the Natura 2000 network and ensure that plans or projects within the Plan area will only be authorised after it has ascertained, based on scientific evidence, screening for appropriate assessment and/or a Habitats Directive Assessment that the plan or project will not give rise to an adverse effect on the integrity of any European Site in accordance with the requirements of Habitats Directive (92/43EEC). The Draft Plan includes a policy to co-operate with NPWS, landowners and stakeholders in the preparation of management plans for designated Natura 2000 sites. The Natura Impact Report of the Draft Plan addresses the points raised in submissions received with regard to European Sites.

Recognition has been provided to the network of Local Biodiversity Area from City Habitats Inventory 2005. A key action of the City Biodiversity Action Plan 2014-2024 is to review these areas as identified in the Habitats Inventory. The importance of biodiversity and the need to protect existing landscape features such as tree, hedgerows, stonewalls, geological and water features is reference in Chapter 2, 4 and 11. The Draft Plan supports the actions of the City's Heritage Plan and Biodiversity Action Plan with regard to the protection and enhancement of local biodiversity. Along with specific policies of Chapter 4, Section 11.3.1 Residential Development standards seek that *"existing trees, hedges and walls, where possible, be maintained. A landscaping scheme including hard and soft landscaping, where appropriate, shall be designed as an integral part of the development"*. The integration of natural features (e.g. natural contours, outcrops of rock) as part of the communal open space provision in residential development is also sought in Section 11.3.1 c of the Plan. Section 11.19 Green Design specifies that new development should consider the use of innovative green design features, such as green roofs and roof gardens in order to enhance biodiversity in the urban environment.

Community Gardens/Allotments:

The Draft Plan recognises, under Section 4.5 Community Spaces, the importance of allotments and community gardens in creating a sustainable city and healthy living. Many of the issues raised in

submissions under this section are operational in nature and are not prohibited by the policies and objectives of the Plan. A city-wide short-term objective of the Plan is to provide for allotments and community gardens in the city subject to Council approval.

Blue Spaces; Coast, Canals and Waterways:

The coastal area, canals and the waterways are assets of major natural and built heritage value. The policies outlined under Policy 4.3 Blue Spaces: Coast, Canals and Waterways seek to protect the nature conservation areas along waterways and in the coastal area while enabling the development and enhancement of the recreational and amenity potential of these areas. Policy 4.3 Blue Spaces: Coast, Canals and Waterways includes a policy, which states that the City Council will work with stakeholders including WRFB, OPW, WRBD and the Corrib Navigational Trust in the management of the river and canal system. It is also proposed to investigate the extensive water resource in the city with a view to exploring where public access and enjoyment can be improved and where potential sustainable uses can be developed to the benefit of the city having regard to ecological conservation and safety considerations. The Draft Plan seeks to ensure that development and uses adhere to the principles of sustainable development and prohibit any development and use, which negatively impacts on water quality.

With regard to the coastal zone, the Draft Plan contains a number of integrated and co-ordinated policies relating to the coastal area, including natural heritage, recreation and amenity, coastal erosion/flooding, water quality and economy, as promoted by the Western Regional Guidelines 2010-2020 and Western River Basin Management Plan. The examination of proposals for the accommodation of commercial boats, such as cafe boats, ferries, tour boats, within the Claddagh Basin, New Dock and Eglinton Canal would be subject to consideration primarily by the relevant controlling parties. The merits subsequently would have to be assessed most likely under the development management system. Policy 4.3 Blue Spaces: Coast, Canals and Waterways include a policy to develop and enhance of the recreation and amenity potential and accessibility of the city's blue spaces. Any coastal/waterway plans or projects that could have potential to impact on a European Site will be subject to requirements of the EU Habitats Directive.

Public Open Spaces:

A number of the issues raised under this section are outside the remit the Development Plan and are addressed by the Parks& Amenity Programme, Recreation and Amenity Needs Study, and City Arts Plan. It is considered that the proposed Public Realm Strategy for the city will address the management of outdoor civic events on public open spaces.

Greenways/Rights of Way:

The Draft Plan proposes a network of greenways throughout the city, which will provide alternative circulation routes for pedestrians and cyclists, as proposed in the GTS, and those specified for recreational and amenity use. These are shown indicatively and allow for flexibility in the route, taking cognisance of site-specific circumstances including the sensitivity of the natural environment and protected habitats. It is the policy of the Draft Plan to preserve existing public rights of way for the common good. A short-term objective of the Draft Plan is to facilitate the extension of the existing coastal greenway, which includes the Salthill promenade to create a continuous link from Bearna to Oranmore in conjunction with the greenway measures as identified in the Galway Transport Strategy including the coastal walk extending from Silverstrand to Sailín if feasible. In order to facilitate and encourage safe routes to school, permeability and convenient circulation routes for walking and cycling, it is proposed to retain the greenway through Whiteoaks/Doire Gheal linking the Clybaun Road. It is noted the greenway forms an integral part of the imminent recreational masterplan for adjoining RA lands which is currently being prepared. The removal of this greenway would be contrary to the green network, recreation/amenity, permeability, accessibility and sustainable transport policies of the Plan.

Other:

A number of the issues raised under this section are outside the remit of the Development Plan. The Draft Development Plan, once adopted, is subject to a two-year review which monitors the progress of the Plan and the achievement of its policies and objectives. The policies of the Plan support and promote the city as a 'Child Friendly City' and seek diversity and flexibility of open spaces to allow different uses and functions within the green network. The description of designated protected views is considered to be adequate as protected views are also expressed graphically on Development Plan maps.

Recommendations:

Proposed amendments relating to this Chapter include Amendments No's:

- A4.1
- A4.2
- A4.3
- A4.4
- A4.5
- A4.6
- A4.7
- A 11.6
- A11.9
- A11.16
- A11.21

Chapter 5 Economic Activity

Summary of Issues Raised

Rezone I to other land uses:

There are 4 overtures to rezone industrial zoned lands from I to CI commercial land use. Requests for the rezoning of 8.05ha (19.9acres) of land from I to other land uses.

- Rezone land from I to LDR. Planning permission granted for house in 1996 (pl. Ref. no. 96/485).
- Rezone I to CI, (1ha) at Ballybane Industrial Park, this would allow for greater employment generating uses on this strategically located site.
- Rezone I to CI at Trappers Tuam Road to reflect the established commercial use on site. Current I land use zoning is inappropriate for the redevelopment and upgrading of this prominent site and is unattractive for future investment. The site is more suited to CI zoning given its location and accessibility and would allow a range of services and employment opportunities.
- Rezone lands (3.24ha) from I to CI at Bothar na Mine, Ballybane to reflect existing uses on the site and to facilitate further development in particular office and employment uses and retail uses relating to the building industry. Seeking the inclusion of a specific objective to facilitate access between the land and the Ballybrit industrial area to the east. This site is underutilised, highly accessible and has significant development potential. The I zoning is not appropriate at this specific location and does not reflect the established land uses in the vicinity.

Economic Development:

- States that key areas and strategy for economic development as defined by the Galway Chamber of Commerce (GCoC) in context of greater region has not been included for in plan or other local plan e.g. LECP, LEO Plan. Argues that there is a lack of a robust economic model for the city and that this model should include for city and county together.
- States that model of economic strategy as included for in Atlantic Corridor Strategy (ACS) would contribute to re-dressing emigration in the West, work in a global economic context, acknowledge sustainability needs, improve lifestyle quality and also make the region a significant economic driver of scale.
- Argues that strategically the draft CDP should have a specific goal that includes for a greater growth in population, that the local economy should target the retention of the future graduates and have objective for attracting in/back an educated workforce.
- The goal should include tangible economic targets –re employment levels increase; specific increase in GVA/person, increase in GDP in city/ region, should also plan for associated infrastructure especially in housing & transport that will be needed for extra population.
- Argues that needs a shared city & county vision driven by strategic economic growth strategy which is currently absent from plan. This should be supported by a broad based Economic Forum tasked with the role of preparing strategy which would set frame for master planning city & county.
- Need for longer term vision -up to 2050 in view of global trends towards increase in urbanisation and be ready for demands for having smarter & greener cities.
- Suggests need for international sustainable business campus. Suggests expansion of Mervue Bus. & Tech. Pk. outwards towards Ballybrit including Crown & Telecom sites to create a city

innovation area supported by sustainable energy and transport. Recommends review of Barcelona/other smart city and green city approaches.

- All initiatives will require high citizen engagement. Of the opinion that current planning model needs re-forming and new type of governance. Suggests 'charette' and consensus models of public engagement be used by city & co. and resultant plans will reflect this active engagement.
- Also has another view that city will be driven by infrastructure and will result in development on east side supporting an industry & enterprise corridor to Athenry which would require the corresponding development of high density housing while protecting built heritage & cultural legacy in city centre as attractors in themselves.
- The 8 priority growth sectors including medical tech; software, financial and international services; creative sector; renewable green economy; ageing; food; tourism; marine, for the Western Regional need to be supported and grown in a cohesive way through the development of regional centres involving the private sector, enterprise support agencies, local authorities, education and training providers, which would drive the development of these sectors in the region.
- Agreeing a city and regional ambition towards '*A confident and ambitious Western Region where excellence, innovation and creativity are rewarded*' and where '*the rich quality of life, clean environment and unique heritage area valued and safeguarded*', where Galway City is a key economic anchor and driver.
- Plan for city and regional performance which achieves GVA growth, employment growth, regional income growth and population retention, and where the west region contributes to and is known as a valued contributor to the national economic performance.
- To attract FDI need good population base, infrastructure, properties, and skills. Good property availability is critical in attracting FDI. City centre locations are now attractive for FDI and a good quality work environment/office accommodation, public transportation, access to education and healthcare, broadband, access to amenities and quality and affordable housing enhances the marketability of the city.
- Include a co-ordinated regional economic development approach, which will provide an overall framework for development of the city and region, while specific sectoral policies in the areas of enterprise support, innovation, infrastructure and investment will underpin it.
- Submission included direct comments on the Draft CDP and also included copies of documents the Chamber prepared for other purposes namely the promotion of a shared vision of an economic corridor with other city/town chambers and a copy of the submission to the Galway City & Co. Economic Plan consultation process.
- Suggests need also for new transport system possibly including an east - west light rail linked in with mainline rail system with a revised road network radiating from the port to proposed road project.
- Argues significant deficit is that plan has no economic model and includes assumption that draft CDP is an economic development plan as per new Local Government Reform Act.
- Includes suggestions for new strategic goals in addition to aforementioned ones. These include objective to -
 - Have in conjunction with the private sector – a regional investment fund & develop co.
 - A commitment to accelerate development through a city/co./region based on city – economic model.
 - Objective to have plus 20,000 new persons attracted into the city in next 5 years
 - Accelerate Galway city as regional capital with commitments to develop resources of region & sustain and increase jobs in region.
 - Develop the city as green energy city.
 - Engage with communities and businesses in development of economic assets and infrastructure.

- Ensure that >10% of public assets & amenities to invest in social enterprise
- Provide 10% of public assets & amenities invested in small businesses innovation schemes that relate to improvements in urban area.
- Provide 10% of funding to meretricious start up enterprises.
- Concludes main points are - should have robust economic model; model should be implemented by an economic forum; forum status established as a development company; draft CDP should not be adopted until measures above implemented.
- Two documents are attached with the submission not specifically prepared as part of submission to Draft CDP.
- *Atlantic Economic Corridor – Regional Economic Strategy Feb. 2016-* This elaborates on the agreed principles of an economic initiative needed in the region defined by the authors, prepared as a result of a collaboration between a number of Chamber of Commerce from Sligo to Limerick (west area of Ireland).
- The second attachment is a copy of submission made during the preparation of the *Galway City & County Economic Development Plan* and gives more elaboration on the background argument to adopting the economic model for Galway City Co. and west of Ireland.
- Notes the available opportunity sites including the Harbour Enterprise Park.
- Ensure that relevant environmental assessments and, where necessary, mitigation is carried out for the re-development of opportunity sites including the Harbour Enterprise Park
- Insert reference and commitment to Green economics and development of a seven-day food market;
- Make references to the bid to become the European Capital of Gastronomy and the European Youth Capital 2019; the importance of promoting co-operatives and social enterprise;
- Insert text in relation to young people and employment
- In relation to *Policy 5.1: Enterprise – Support the sustainable development and extension to Galway Harbour subject to environment, visual, economic viability and transportation requirements* highlights that proposed harbour development is currently under consideration by An Bord Pleanála in the context of Article 6(4) of the Habitats Directive

Enterprise and Employment:

- Insert under Policy 5.1 Enterprise a new policy to support and facilitate the green economy and the creation of green jobs.
- Insert under Policy 5.1 Enterprise a new policy to support and facilitate local social enterprises and Fairtrade.
- Insert under Policy 5.1 Enterprise a new policy to support and facilitate divestment from fossil fuel and tobacco industries.
- Insert under Policy 5.1 Enterprise new policies to support and facilitate the introduction of a local currency for Galway, a Green Chamber of Commerce, green procurement, a new local bank for Galway, local co-operatives, shorter working week models, and green credit unions.
- Insert under Policy 5.1 Enterprise a new policy to produce an annual carbon budget and ecological footprint for Galway City.
- Insert under Policy 5.1 Enterprise a new policy to place well being at the centre of economic policy and to foster the share economy.
- Insert under Policy 5.1 Enterprise a new policy to budget for climate change mitigation and adaptation.
- Insert under Policy 5.1 Enterprise a new policy to support and expand the 'Made in Galway' brand.
- Insert under Policy 5.1 Enterprise a new policy to support and facilitate energy co-ops.

- Insert under Policy 5.1 Enterprise a new policy to promote a centre for practical sustainability for Galway within the R&D renewable energy and sustainable food sectors. The centre will incorporate education, tourism, creativity, prototyping, piloting and testing a wide range of solutions.
- The role and importance of the Traveller economy and entrepreneurship should be recognised in the plan and specific provision for support mechanisms for social enterprises that are developed by Travellers, or by Traveller organisations included.
- The employment of Travellers in any future recruitment processes should be targeted and specific enterprise supports for travellers developed.
- All strategies and plans should be equality proofed and policies subject to social and regulatory impact assessment.
- Need to promote the west of the city as a location for Smart industries, including those with links with NUIG.
- Include an objective under Policy 5.1 Enterprise to explore the creation of a social enterprise hub using City Council Sandy Road enterprise units.
- Locate new business parks along primary routes, and where accessible by railway and public transport.
- Ensure the plan facilitates the development of a environment for workplaces and industry including for active travel, mobility management, recreational facilities and amenities
- Support the implementation of Healthy Workplace initiatives as identified with Healthy Ireland.
- Facilitate the accommodation of Health Care facilities and services including Primary Care services

Tourism:

- Seek further recognition should be given for the need for various types of tourist accommodation.
- Parking standard for hotels in city centre is excessive.
- Have greater flexibility in the application of car parking spaces for all city centre uses including tourist accommodation.
- Seeks additional references in Section 5 Economic Development with regard to tourism sector as an economic driver and as a strategy in Section 5.1.
- Would welcome a dedicated tourism chapter in the Plan that would encompass all policies and objectives relating to this sector and recognise its significant role it plays in Galway as the Tourism Strategy is not a statutory document.
- Requests references to the following; tourism revenue and visitor statistics taken from Fáilte Ireland Tourism Facts 2014, commentary on profile of visitor market, support for a strategic regional tourism plan, incorporate Wild Atlantic Way and the Blue Economy into zoning maps, and promotion of green tourism initiatives.
- Seeks the insertion of a new policy in Section 5.3 to continue the collaboration between City Council, Fáilte Ireland, and other tourism development partner to adopt joint objectives for the development of the city's tourism sector during the lifetime of the Plan. These are: to 'refine' the Galway tourist experience and develop a clear tourism identity for city; to improve the visitor experience to ensure all visitors to the city; to capitalise on Galway's status as the only city and mid-way point along the Wild Atlantic Way, to finalise the Tourism Strategy for Galway City.
- Insert reference to Wild Atlantic Way branding strategy in Section 4.3, and incorporate into the zoning map.

Response:

Rezone I to other land uses:

The Core Strategy has established the framework for development of land in the city. It is supported by an evidenced based analysis where the need for zoned lands is qualified by demands that are linked to regionally defined population targets. It is considered that the overtures to change industrial zoned lands to more mainstream commercial land would not be acceptable.

Firstly the impact of change would decrease the availability of industrial zoned lands which is important for supporting uses such as light industry, small manufacturing and service units. In addition it can also accommodate other uses that have large demand for floorspace like car sales, garages, wholesale retailing and warehousing.

In fact the Draft Plan overtly recognizes that Industrial zoned lands need to be protected from higher value uses. A normal functioning economy does require the full range of economic activities to be catered for and the current proposals are not justified noting all sites requesting change to CI are currently occupied and trading. These industries are generally indigenously owned and operated. To retain the current zoning on these lands will be important in the future in view of the increasingly important role indigenous firms is considered to have in future economic growth.

Secondly, the change to CI would consequently impact on the Objectives in Chapter 6 with respect to the Retail Strategy. The locations for change proposed do not form any definite pattern and do not generally accord with the retail hierarchy that is District, Neighborhood or Local Centres. The Draft Plan aims to concentrate commercial developments and align these with settlement nodes. The logic for this is that it can offset the need to travel to a number of different locations for different commercial demands. Land and infrastructure can therefore be used in the most efficient fashion. In addition the city will get a more proportionate geographical spread and of critical importance, public transportation investment can achieve maximized efficiencies.

Following an assessment to determine the estimated requirements for additional commercial floorspace it was established that there is no need to consider additional commercial zonings for the period 2017-23. The legacy of the 2011-2017 Development Plan is such that there is already a significant amount of land with commercial floor area granted /zoned for commercial purposes. Trends in retailing show a huge decrease in spend in recent years, with little to no new build in retail floorspace development except for the discount convenient food retailers over the last few years. This coupled with a conservative growth predicted by the ESRI indicates little demand for more expansion in zoning. This is also in the context of current high levels of vacancy in commercial premises as recorded recently. To allow for more retail floorspace would further reduce the capacity of unfinished retail parks to succeed and would also undermine the prime role of the city centre. It would also not be feasible to justify such additional zoning in the current Retail Strategy, which is linked in with the Core Strategy, both of which are required to be justifiable through evidence based analysis.

An amendment for a specific objective is proposed to allow for an element of flexibility within the existing floorspace of The Trappers Inn, a non-conforming use located within a larger tract of I zoned lands to address a recent refusal by An Bord Pleanála following a grant of permission by the Council. What this would do is allow for interchange between the existing commercial use floorspace on site for other similar uses but it would not alter the zoning of the overall lands which is far greater bank of land than the functional site of the Trapper's Inn.

An additional submission has requested a change to LDR on I zoned lands. This would reduce the bank of land available at Ragoon for these purposes and impact on the potential for a co-ordinated development on these lands. It would, if allowed to change be precedential for permitting uses that

could in the longer term jeopardize the potential to develop these lands in a comprehensive and coordinated and unhindered manner. The I zoned lands are part of strategic bank of land to provide for employment opportunities on the west side of the city. Being located close to a junction with the reserved N6 GCRR corridor the land could be greatly enhanced by the delivery of this road and the associated link in close proximity. The original permission for a dwelling on these lands was granted 20 years ago and has obviously well expired. The current zoning has existed over two development plans.

Economic Development

The policies in 5.1 give general support to a wide range of economic activities and their ancillary requirements as much as is possible within a development plan.

The very broad submission from the Chamber of Commerce focuses significantly on economic changes at political, corporate and national policy level. The Draft Development Plan is not solely an economic plan and is a land use plan with an element of economic planning/activity. Many of the issues raised are within the remit of the Galway City and County Economic Plan and the LECP. The Draft Development Plan cannot incorporate the Atlantic Corridor Strategy in its totality as it is not national (NSS), regional (NWRA), or IDA policy. The suggested radical changes too may be more suitable as a submission to the imminent – review of the NSS and the consequent delivery of the Regional Spatial and Economic Strategy for the BMW region.

It is confirmed that the City and County Economic Strategy has a shared vision and this is included for in Chapter 5 Economic Activities. In addition it is confirmed that the land use zoning objectives of the Draft Plan support the development of existing technology and business parks in the city. Policies for Smarter Cities are included in Chapter 5. Reform of the planning model is outside the remit of the Plan and is an issue for Local Government reform should it be required. The transport system will be addressed by an amendment to Chapter 3 Transportation.

A regional investment fund and the other issues raised in the submission regarding funding investment are outside the remit of the Development Plan. Some may have relevance to the City and County Economic Strategy and the Action Plan for Jobs (West Region), IDA Enterprise Ireland and the LEO office.

Enterprise and Employment:

It is considered that the overall aim of Chapter 5 “..to promote a balanced sustainable, economic development of the city “ has an embedded objective to culture an economy that respects the environment. This is also included in a number of the overall goals in Chapter 1 as is the objective of equality and social inclusion as further elaborated on in Chapter 7. It is considered that there are no impediments to developing an economy that aims at reducing environmental risk, ecological scarcity and sustains environmental standards.

The more global objective to actively promote a “Green“ economy is more for the introduction of national standards and regulations and for the LECP and the City & Co. Economic Strategy to include as a specific pursuance.

The aims, strategies and policies for the city economy includes for a flourishing of all forms of the economy irrespective of who is generating the activity. It promotes a “resilient and diverse city economy that meets the needs for sustainable employment opportunities” therefore it encompasses the need for a broad range of jobs for all, including members of the Travelling community. The principles of equality and social inclusivity are outlined in greater detail in Chapter. 7. The specific recognition of the Travellers economy and the requested relevant supports required is more appropriate to the LECP and national employment policies and initiatives. The operation of the Council’s enterprise units is not governed by the City Plan.

The Core Strategy and Chapter 3, including the proposed amendments, highlight the integrated approach to land use, where uses and travel patterns have been integrated in particular settlement and employment hubs. This addresses the issues raised regarding choices of sustainable mobility to workplaces.

Chapter 5 includes for a policy regarding workplace wellness delivered through design, layout and landscaping. It is felt that this contributes to healthy workplaces as far as is possible through the planning process.

Primary Care Centres/Services are overtly recognised as important in Chapter 7 and are specifically mentioned also in Chapter 6 and Chapter 11 as important community facilities that can be accommodated within the retail hierarchy. Such uses have been permitted at these locations in the past and some of these permissions are still valid but not activated to date.

Tourism:

Chapter 5 gives specific recognition to tourism as an economic activity and this has been expanded on from the previous development plans and considered sufficient for the purposes of a development plan. This is coupled by insertion of an expanded section on the creative culture sector which has strong links with the tourist economy. Acknowledgement of the benefits of the Wild Atlantic Way has also been included in this chapter. Many of the more specific issues raised in the submission are more appropriately aligned to the Tourism Strategy and Economic Strategy. All statistics in the plan, such as tourist visitor rates and expenditure will be updated where these are available specifically for the city immediately prior to final publication of the Plan which is estimated to be in January 2017. As these are facts they will not require further material amendments.

There are numerous policies and objectives in the plan that although don't specifically reference the benefits for tourism, will in fact improve the tourist experience, facilities and city brand e.g. public realm strategy, recreation and amenity objectives, transport strategy etc.

The Draft Plan recognises and supports different types of tourist accommodation. Notwithstanding this, the description of tourist accommodation is being amended in Ch 11 to broaden categories. With respect to the city centre and car parking requirements, it should be noted that the Draft Plan does in fact include for the acceptance of Transportation specific contributions in lieu of car parking space provision where deemed appropriate.

Recommendations:

Proposed amendments relating to this Chapter include Amendments No's:

- A5.1
- A5.2
- A5.3
- A5.4
- A 11.3
- A11.14
- A11.15
- A11.16

Chapter 6 Retail Strategy

Summary of Issues Raised

Rezone CI Lands to other Land Uses:

There are 3 overtures to rezone CI zoned lands to R residential purposes, a total rezoning of 1.22ha (3 acres) from CI to R.

- Rezone lands from CI lands to R and remove neighbourhood centre specific objective designation or relocate to adjacent northern site adjacent to roundabout, (currently zoned CI). There is significant CI zoned lands in Knocknacarra area of more suitable scale at more suitable locations. In light of previous refusals from An Bord Pleanála unlikely that CI type development would proceed at this site. The demand and need for a neighbourhood centre has not been justified and should this designation be retained, a preferred location would be the adjacent CI zoned site which has good street presence.
- Rezone lands at Ballyburke (Thomas lands) from CI and R to RA to protect the amenity and biodiversity value of these lands for the well being of surrounding residents.
- Rezone lands from CI to R (0.22Ha) and rezone RA to R (0.8ha) Upper Salthill Road/Knocknacarra Road (Spinnaker Hotel). If this is deemed to be unacceptable alternatively seeking to allow RA zoned land to be considered as part of open spaces calculation for any proposed scheme on the entire site. Use of RA lands as part of open space associated with residential development of the overall site would achieve improvements in residential and visual amenity. RA land is currently used as a car park. There is sufficient RA zoned lands in the vicinity. Requests higher plot ratio given its brownfield status, its strategic location and the permitted development on the site. Existing plot ratio is 0.75:1 and permitted plot ratio 1.2:1.

Core Retail Area:

- Refine core retail area within the city centre.
- Support the primacy of the city core retail area.

Retail Activities:

- The mapping of geo directory commercial and retail address points is beneficial when focusing on economic and retail activity providing strong baseline data from which to work from. And it is noted from analysis there is no increased need for additional zoned or otherwise designation of lands for retail from that zoned in the 2011 – 2017 City Plan.
- Insert new policies under Policy 6.1 Retail Strategy to support and facilitate a city centre full-week municipal food market and new outdoor markets.
- Insert a new policy under Policy 6.1 Retail Strategy to support and facilitate Slow Food, refillable containers and eco-fashion.
- Include a policy in Section 6.1 relating to retail tourism.
- Highlights that DECLG Local Area Plan Guidelines (2013) includes that LAPs can promote active and healthier lifestyles by ensuring that: “exposure of children to the promotion of foods that are high in fat, salt or sugar is reduced such as the careful consideration of the appropriateness and or location of fast food outlets in the vicinity of schools and parks”
- Recommends that any new fast food outlets which offer foods high in fat salt and sugar are excluded from operating within 400m of gates or site boundary of schools, parks or playgrounds.

- Support the implementation of Galway City Alcohol Strategy to Prevent and Reduce Alcohol-Related Harm with specific regard to the following actions;
 - Limit the availability of alcohol in Galway City – reducing the number of outlets selling alcohol and strengthening zoning regulations
 - Reduce the exposure of children to alcohol marketing in public places

Other:

- Delete requirement for a minimum of 20% residential/residential commercial floorspace as part of any new development in Knocknacarra District Centre (Gateway Retail Park). Expand the range of uses permission in principle in CI zoning objective. The designation of Westside as a district centre undermines the development of Knocknacarra District Centre. The N6GCTP should retain existing access arrangements to Knocknacarra District Centre.
- Include a site specific development objective to consider the development of the site for convenience retailing on CI lands (0.9ha) Motorpark Sandy Road. Has significant potential for large convenience retail development. The site is highly accessible and prominent site. This is an edge of centre site as defined by Retail Planning Guidelines and is closer to the core retail area than other CI zoned lands.

Response:

Rezone CI Lands to other Land Uses:

One of the submissions regarding re-zoning relate to lands on the Western Distributor Road that have been the subject of two recent refusals by An Bord Pleanála. The submission, the site and the reasons for refusal have been examined. It is considered that the issue of scale of retail /commercial facilities was a critical element in the refusals. The Council would argue that this area supports a significant portion of population which will increase following development of the balance of the undeveloped residential zoned lands in the area. This area is not within walking distance of the District Centre at Knocknacarra and it is not well served by local shops/services. In this regard there is a proposed amendment to change the zoning to residential but to require the provision of the equivalent of 20% of the potential floorspace of the site be reserved for local convenience shopping and local services. This represents a good sustainable balanced resolution to issues raised. This will not have a significant impact on the retail hierarchy as the site will fulfil a neighbourhood centre use and comply with the policy on distribution of potential demand for additional floorspace as identified in Chapter 6 and as required under the Ministerial Guidelines on retail planning. It will also allow for residential floorspace of up to 80% of the development on the site.

It is proposed to amend the existing zoning on the Spinnaker House Hotel. The main premises have been closed for a long period and the site currently has the benefit of permission for a niche hotel and a number of apartments. The proposal to change to exclusively residential is not a radical change in use from commercial residential (hotel) to private residential (housing) and is deemed acceptable. It is not considered appropriate to allow the site to continue to have the same density as a commercial site as the requirements are different and design and visual impacts can be greater in such a sensitive location where there are protected views. However it is considered appropriate to allow credit for the floorspace of the existing hotel, which is higher than normal permissible residential densities and to allow for the requirements for associated amenity space to be located on the RA zoned lands subject to environmental rehabilitation from the current use as surface car parking.

Core Retail Area:

The core shopping area definition also accords with the definition in the Ministerial Guidelines and has been accepted as such by the Department. and accords with the Regional Planning Guidelines. The definition of the city core shopping area in the Draft Plan is the same as what existed in previous plans with no change. The submission on the issue suggests a reduction, however this is not recommended as Galway City functions as a regional retail centre, as is acknowledged in the current Ministerial guidelines on retailing and requires a core area of this scale.

The Draft Plan supports the protection of the prime role of the city centre and this is expressly provided for in Chapter 6 strategic objective and also in policy Section 6.1.

Retail Activities:

The policies in 5.1, in particular the support for the food sector and the objective for a public realm strategy which will identify locations for outdoor events will contribute to supporting any outdoor market venture. The more specific details can be included for in the LECP /Economic Strategy if merited, including the issue regarding the type of food markets.

The importance of retail tourism is acknowledged also and there is sufficient reference to retail tourism and the benefits and importance in Section 6.1 and in Chapter 5 Section 5.3.

The Development Plan is not considered the appropriate platform for controlling sale/ use of alcohol. In addition, it is considered that the Development Plan and indeed the planning legislation are not suitably designed to control high fat and high sugar consumption. It puts an onus on planning officials to establish food content for sale as such food types are not restricted to “fast food” outlets only and to consequently require restrictions on trading. This is excessive control and also not viable. In addition a 400m ban in a city of the scale of Galway would be very extensive. Certain change of uses from existing uses do not require planning permission either, so regardless of controls these could be circumvented without requiring consents.

There are already certain restrictions in chapter 11 regarding the proliferation of uses – fast food outlets, off –licences. This comes more from the desire to have a balanced mix of uses available to the public in retailing and to preserve the prime retail streets for high quality goods trading. The issue of community consumption habits and consequent impacts is better addressed through health policy actions, encouragement of good behavioural habits and health and wellbeing education.

The facilitating land uses and policies which encourage recreational activity, protect natural amenity and encourage sustainable movements patterns are areas where land use planning can positively contribute to physical health. These are included for in the Draft Plan.

Other:

No amendment to the Draft Plan is recommended with respect to the District Centre at Ragoon/Knocknacarra. The requirement for 20% residential floorspace is necessary in the district centre to have a sustainable mix of uses and to encourage a 24/7 living environment with vitality, passive surveillance and sustainable co-location of residential and jobs. This area will include other non – commercial uses such as a school which is beneficial and complementary to residential use. It already has in the recent past had permission for a significant number of housing units which proved its suitability in terms of design, layout and capacity (on the site of 12ha) to integrate with the surrounding context.

It also has a facility and plot ratio to sustain a broad range of uses and no expansion in this range is deemed necessary as it is considered that it should function to serve the wider Knocknacarra area but in doing so pose no threat to the prime role, attraction and nature of retailing in the city centre.

The designation of Westside as a District Centre was specifically requested to be included in City Development Plan 2011-2017 by Council Members in 2011 and no change is now recommended.

The design of the N6 GCRR is not part of the Draft Plan – only the associated corridor. Issues relating to the design of the road and priority of link roads should be discussed with the Road Design Office.

To allow for a specific objective on the site of the “Motorpark Headford Road” to facilitate convenience retailing would be tantamount to changing the area to a neighbourhood centre status as the associated site is nearly 1 ha in area. A change such as this would be in conflict with the retail hierarchy and the Ministerial Retail Planning Guidelines, where it states that neighbourhood centres should be located adjacent to existing residential population as per the retail hierarchy and as stated “..only where the applicant can demonstrate and the planning authority is satisfied that there are no sites or potential sites including vacant units within a city or town centre or within a designated district centre that are (a) suitable (b) available and (c) viable, can that edge-of-centre site be considered” pg 30 . In contrast to what is argued there is no demand to expand the city centre /core area particularly in view of the already huge potential for development on the designated regeneration sites at Ceannt /Headford Road /Harbour which are the priority sites for re-development.

Recommendations:

Proposed amendments relating to this Chapter include Amendments No’s:

- A6.1
- A6.2
- A6.3
- A6.4
- A11.15

Chapter 7 Community and Culture

Summary of Issues Raised

Rezone CF land to other Lands Uses:

- Rezone CF City Council lands (2.5acres) to R zoning to meet significant social housing demand in the city.

Community and Cultural Facilities

- Insert new policy under Policy 7.2 Creative City to support the provision of a site/building for a community-led cultural hub for the city centre Galway Craft Gallery.
- Insert new policies under Policy 7.2 Creative City to support and facilitate a Galway Environmental Film Awards, greener festivals, events and venues, collaboration between artists and engineers, greater engagement between artists and community groups, sustainable themes, material, methods in public art work, local artistic talent, 'Postcards for 2030' initiative, volunteerism, and Galway Sports day/week/month.
- No further subsidy for art house cinema.
- Insert new objective in Section 7.5 Specific Objectives, facilitate the creation and on-going development of a series of cultural trails, in collaboration with National Trails Office, combining the assets of the food, creative and agricultural sectors.
- Insert in Chapter 7 a new policy to support and promote the existing festivals and cultural events which take place in the city and to facilitate the establishment of new events where viable and support community groups and festival committees in identifying and accessing new sources of funding for festival and events in the city.
- Amend policy to explicitly support existing community service providers and facilities.
- Council owned community halls/indoor sport facilities should not be managed by private operators.
- Insert new policy in 7.2 Cultural City to facilitate the on-going use of public spaces within the city to host major public events, priority congregation spaces have been identified (eg. Eyre Square, Fishmarket, Headford Road, Ceannt Station, Inner Harbour, locations to be shown on map) and the Council will ensure these locations can be appropriately managed and have sufficient services and infrastructure to facilitate events.
- More community facilities and greater accessibility.
- Use existing community facilities for public information events. Support broader use of community facilities.
- Include under Policy 7.4.1 the following:
 - Support and expand community centres that respond to a range of social facilities and services, such as for the youth, refugees and migrants and other community voluntary groups
 - Such voluntary community organizations provide a framework for community interaction and service which are critical for building cohesion and integration.
 - Further, social and civic education forums that seek to promote the involvement of the youth in democratic participation and citizenship, through meetings, debates, local histories and interactive workshops would enable the youth to fully realize their potential and actively involved in public life. Moreover, creation of youth forums, youth teams and conferences would provide the youth to identify and address specific youth concerns, including alcohol abuse, youth crime, anti-social behaviour etc.
 - Alcohol free venues for arts, festivals and music events would add so much to the city in terms of creating safe and enjoyable environment, accommodating young students, families and individuals from a variety of backgrounds, age-groups and cultures.

- Community policing, neighbourhood watches and traffic calming devices in estates are also some of the service needs that have to be addressed.
- GCCN would welcome an explicit statement that Galway City Council will support community owned facilities and resource centres.
- Where community facilities have been developed or are being developed, GCCN opposes the policy direction in favour of tendering for the running of facilities. We are in favour of retaining facilities in community ownership and management with the support of community enterprises or local co-operatives. Access by the community needs to be retained as an absolute priority.
- GCCN would welcome commitment to a scheme to enable the re-development and refurbishment of community centres, including community-owned centres.
- GCCN would welcome an explicit reference to supporting the LGBTI resource centre in the city in the long-term.
- GCCN also proposes a new bullet with the following wording: "Inclusion in any development of better lighting to discourage anti-social behaviour, more seating in playgrounds and sheltered bandstands for outdoor use".
- Welcomes focus on urban design and commitment to facilitate the expansion of the arts and culture experience of the city through; maximising the Percent for Art scheme; best practice in the context of the Barcelona Declaration in regeneration projects, extend urban design and arts/culture infrastructure to local communities by encouraging development of creative hubs in suburbs.
- Community proof all arts and culture infrastructure to ensure accessibility for all members of the community in particular the socially excluded.
- Community facilities should remain in community ownership and management.
- Ensure all future community developments area carbon neutral and sustainable.
- Develop an Arts Facility Master Plan. With identified provision for all art forms, including arts spaces outside the city centre and major developments in the city.
- Insert policy under Policy 7.2 Creative City to facilitate and encourage cultural facilities to include rehearsal, performance, set building, artist's studios, storage space and office with broadband.
- Amend policy under Policy 7.2 Creative City to support the establishment of school of music and that a lead agency be appointed to spearhead the development of a school of music in Galway.
- Support artists, artist groups, arts infrastructure/organisations providing studio/gallery spaces and support proposed Municipal Art Gallery.

Social Inclusion:

- Sets out an Accessibility Strategy 2015-2018 to met the strategic goals of the Development Plan to achieve an accessible and socially inclusive city.
- Revise the wording of Policy 7.4 Inclusive City to ensure clear outcomes in social inclusion and to define the role of the social inclusion office.
- Requests a specific reference to Galway City Community Network in Policy 7.4 Inclusive City.
- Suggests a new section in the Plan regarding youth engagement.
- The Traveller community have a right to a cultural identity, without discrimination or marginalisation. This should be recognised and reflected in the Development Plan and in all implementation measures.
- The emerging National Traveller and Roma Inclusion Strategy will need to be considered in all plans.
- In making and implementing the plan, the city council must have due regard to equality legislation, eliminating discrimination, advancing equality and protecting human rights.

- Galway City Council should support traveller research and initiatives.
- A National Traveller Agency is required to implement all Traveller related policy.
- Requests the inclusion of the promotion of the city as 'Disability Friendly ' under Section 4.1 Strategy.
- Travellers should be recognised as an ethnic minority group.
- Collect data on the needs and participation of Travellers in all aspects of life and work in the city and monitor effectiveness of services and initiatives.
- Traveller Accommodation and Traveller economic activity should be considered in Ardaun and all LAPs and consultation undertaken.
- Include in Policy 7.4 Inclusive City reference to the Public Participation Network in Galway City as a core element of civil society in Galway and a key partner in many of the planned activities.
- The public sector duty obligations under the Irish Human Rights and Equality Commission Act 2014 should be specifically referenced and stated that principles of equality, sustainability and accessibility underpin the Development Plan.
- Clarify that the use of words citizen and citizenship includes all residents of the city and does not exclude those who do not have Irish citizenship.
- Plan imagery should reflect the diversity of its people and communities.
- Reference should be made to monitor and review the implementation of the plan in consultation with stakeholders.
- Welcome reference to LECP notes this is a living document and reference to supporting goals, objectives and building on actions is required.
- Qualify the status of the LECP as a living document and is therefore yet to be fully expanded upon and developed in conjunction with the community sector. LECD deficient in representation of the community sector.
- Recognise that the Irish State is soon to ratify the UN's Convention on the Rights of People with Disabilities, the Council should build on its commitments to the Barcelona Declaration and National Disability Strategy Implementation Plan.
- Ensure tackling inequalities is at the heart of policy making in the City and that the City Development plan.

Irish Language:

- Commends efforts by Council towards bi-lingual city.
- Support Galway's bilingual city's status.
- Development and market a brand for Galway as a bilingual city.
- Welcomes reference to bilingual city and Irish language, reference should be given to the multi-lingual diverse city community.
- Growth & development of the Gaeltacht areas should be supported & managed through investment in education, IT, Communication, travel, retail, structural infrastructure & leisure & arts infrastructure.
- The Local Authority should work in partnership with communities & organisations to strengthen the gaeltacht and to attract inward investment.
- Significant requirement for improvement of public infrastructure & transport within the Gaeltacht.
- Council engage with relevant bodies to establish second level Gaelscoils in the parts of the city not currently serviced by such schools.
- More facilities/services as Gaelige, Bilingualism.
- Strategic policies for land use within Gaeltacht areas including for social & affordable housing.

- Policies to promote and preserve the Irish language through language planning practices and in partnership with relevant state agencies.
- Public signage to be in Irish as far as is possible.
- Support the continuation of the naming of new housing developments in Irish and extend this practise to public buildings.
- Promote Irish language in all cultural infrastructure and activities.
- All new and replacement signage on business premises to include some Irish wording.

Schools/Childcare:

- Consider a specific land use objectives for school provision and identify suitably located lands to meet educational needs.
- Identify sites for education uses close to community facilities to allow shared facilities.
- Insert specific objective in Section 7.5 to Provide for recreational and outdoor playing areas, for school and community use, at locations close to existing schools and residential areas.
- Consider buffer zones around existing school site to allow for school expansion.
- Introduce no-fry zones adjacent to schools, with the exclusion zone set at 1km.
- Specifically exclude any requirement for schools to use renewable energy source and green roof technology (Section 11.18 and 11.19), schools to be guided by Departments standards.
- The importance of the university to the city and county must be a consideration in the planning process and strong policy put in place to facilitate the sustainable growth of the university.
- Requests designation of Galway as a 'University City'.
- Support community based after schools projects in disadvantaged areas.
- Protect community based childcare facilities.
- Consider under Policy 7.4.3 Childcare to support the development and implementation of the Galway City Early Years Plan for 0-3s, currently in development.

Healthy Cities:

- Welcomes support for the WHO Healthy City Project and all island Network of Healthy Cities. In Policy 7.4 Inclusive city
- Creating resilient communities and supportive environment is a core theme of current phase of the WHO Healthy Cities programme. Theme considers issues such as Healthy Urban Planning and Design, Healthy Transport, Climate Change, Healthy Settings, Housing and Regeneration.
- Draft Galway City Development Plan has the potential to deliver a more co-ordinated and integrated approach to improving the health and wellbeing of the local population.
- Suggests health and wellbeing should form a central theme in the City Development Plan and include goals and policies to promote and protect health and wellbeing.
- Recommends that Health Impact Assessment is incorporated as a core element of all aspects of the plan. While HIA is currently recommended in various policy documents, it is predicted that HIA will become mandatory. Links to publications from Institute of Public Health on HIA provided.
- Incorporate Health Impact Assessment and best practice guidelines in the development of the built environment.
- Suggests that a percentage of budgets are allocated for Health Impact Assessment e.g. 1% to provide the necessary resources and commitment
- Consult and collaborate with HSE Health and Wellbeing and other Divisions regarding health status and needs of the local population
- Use health related checklists for scrutinising plans and proposals. UK checklist examples provided.

- Prioritise evidence-based actions to promote health and wellbeing objectives as part of the plan. NICE examples relating to walking and cycling infrastructure and retrofitting homes provided.
- Incorporate health promoting design principles to ensure that the environment impacts positively on physical and mental health e.g. location and density of land use, street layout and connectivity, access to affordable and healthy foods, safety, open and green space, affordable and energy efficient housing, air and noise quality, active travel
- Develop a monitoring and evaluation framework to assess how health and wellbeing is promoted.
- Take into account the future expansion requirements of Galway University Hospitals when progressing infrastructure development so that much needed health facilities may develop as health funding is made available.
- Take into account the future expansion requirements of Galway University Hospitals when progressing infrastructure development so that much needed health facilities may develop as health funding is made available.
- Take into account the Hospitals Development Control Plan which is currently under review. Current / proposed development include the following:
 - Consider constraints that may exist in developing facilities on existing sites.
 - Background data provided relating to aims of WHO Galway Healthy Cities Forum and Healthy Ireland - A Framework for Improved Health and Wellbeing (2013-2025). Research into range of social, environmental and economic factors outside the healthcare sector, which influence health and wellbeing (Determinants of Health) also provided, many of which are identified in chapters of Draft Plan.
 - Clarify whether proposed access to Merlin Park University Hospital at Galway Crystal would, in addition to buses, also cater for other public service vehicles and how additional traffic would be managed in the context of the acknowledged existing pressures on the hospital roadway system. Before considering initiative, HSE and hospital management would also require clarification on precise nature of scheme and how City Council propose to resource and develop the network and manage the through-traffic in the context of a functioning hospital environment. A safe vehicular and pedestrian access to hospital is a priority.
 - Support the development of a Suicide Prevention Action Plan for Galway focusing on a more co-ordinated and sustainable approach to suicide prevention
 - Support the implementation of the National housing and disability strategy for people with enduring mental illness
 - Support the development of the Galway city Early years plan for parents and children aged 0-3 years which will strengthen investment in prevention and early intervention, focus on health and well-being, parenting and early childhood care
 - Support the development of a Homeless Information system for Galway city for those persons who are homeless or at risk of being homeless as well as for services who confront homeless issues
 - Support the development of primary care services, a key element of the overall Health Reform Programme.
 - Encourage the recreation and amenity use of the Merlin park campus
 - Continue to further develop the Galway Healthy Cities Programme in conjunction with local agencies
 - Further develop the Galway city strategy to prevent and reduce alcohol related harm
 - Support the development of local sport and physical activity programmes and plans
 - Support the development of a more unified approach in collecting and utilisation of data across agencies
 - Support the implementation of Transforming Lives, the programme to implement the recommendations of the Value For Money and Policy Review of Disability Services in Ireland.

This will see a move from institutional models of care to a community based person centred model enabling and supporting meaningful lives as chosen by people with a disability

- Support the development of Community Nursing Units in Galway City
- Support the development of plan to promote positive ageing and improve physical activity levels in partnership with other agencies.

Culture:

- Welcomes Objective 7.5 to prepare and implement a Tourism Strategy and ITMP for the city.
- Consider under Policy 7.2 Creative City to implement best practice in developing Galway as a Creative City (e.g. Creativity, Culture & the City: A question of interconnection) and UNESCO's Global Alliance for Cultural Diversity and the Creative Cities Network
- Consider under Policy 7.2 Creative City to provide for alcohol free venues for arts, festivals musical and cultural events which are accessible to all cultures and abilities including families
- Imagery in the Draft Plan needs to reflect diversity in the arts.
- Seeks broader definition of culture.

Response:

Rezone CF land to other Lands Uses:

An amendment is recommended to rezone CF zoned lands at Doughiska to meet the social housing demands in the city. The R zoning would be compatible with existing uses in the vicinity and is supported with facilities and services including access to public transport and enables best use of these lands to meet urgent housing needs. It is noted also that the area has already had considerable community and institutional development independent from this land and CF exclusive zoning too e.g. preschool, primary school, secondary school, primary care centre, church, community centre.

Community and Cultural Facilities:

Policies 7.4.1 Community Facilities seeks to facilitate balanced and equitable provision of community services and facilities throughout the city, through policies, zoning objectives and specific designations. A major theme in submissions was the need to support and expand community facilities in the city and promote greater accessibility for all members of the community. Many of the submissions received raised concerns over the management of facilities, which is an operational matter and outside the ambit of the Plan.

Social Inclusion:

While it is acknowledged that the Draft Development Plan is a land use document, the Draft Plan includes policies to proactively promote all forms of social inclusion, where feasible in land use terms. Policies encourage an integrated city community. The overall aim is to create a socially inclusive city including for all members of the community, different age and economic groups, ethnic groups, the elderly and people with disabilities. The various policies of the Draft Plan support the socio-economic and cultural goals of the Local Economic and Community Plan (LECP) and seek to incorporate these goals with the sustainable physical development of the city. The Plan also acknowledges on-going measures with regard to social inclusion including the actions of the City Council's Social Inclusion Office and the Council's commitment to the Barcelona Declaration in creating an accessible built environment. The promotion of universal access and improved accessibility is included in the Core Strategy, Chapter 7, Chapter 11 and Schedule 1 Housing Strategy.

The Council also seeks to co-operate with the Access for All Committee and other organisations representing people with disabilities to provide equal access for all, in particular in the area of

housing, transport, the built environment and the public realm. The WHO Healthy City, Age Friendly City and Child Friendly City status of the city is promoted. Traveller accommodation and housing are addressed in Chapter 2, and Schedule 1 Housing Strategy and many issues raised are within the remit of the Traveller Accommodation Programme and LECP. The diversity of the city's community is acknowledged in the Plan and in support of this the definition of citizen/citizenship is to be amended in the glossary of the Plan to include all inhabitants of the city.

Irish Language:

The Draft Plan under Section 7.3 Bilingual City (pg. 99) recognises the unique social, cultural, artistic and economic importance of the Irish language and culture to the city and the objective to establish the status of the City as *a Bilingual City*. Many of the submissions received under this topic welcome the policies under this section. The Draft Plan commits to continue the use of Irish in signage and place naming and support of all Irish culture in the city and includes a policy to designate a Gaeltacht Language Planning Area.

Schools/Childcare:

Section 7.4.2 Education promotes schools provision as an integral part of the development of sustainable residential neighbourhoods and the Council will encourage the location of schools adjacent to residential areas, public transport routes and community, cultural and recreation facilities to encourage synergies between facilities. Section 7.4.3 Childcare supports the development of all types of childcare facilities, including after school facilities at a number of suitable locations city wide; including residential areas, places of employment, city centre, neighbourhood and district centres, schools, near educational and community establishments and adjacent to public transport nodes.

Healthy Cities:

Healthy lifestyles and well being is a key goal of the Core Strategy and land use policy of the Plan. Strategic Goal no. 6 of the Draft Plan aims to strengthen the green network and linkages recognising the range of recreational benefits, the potential through facilitating active and healthy lifestyles, it can have on the quality of general health and well being. Section 7.4 Inclusive City specifically references health and well being. Chapter 4 Natural Heritage, Recreation and Amenity supports the participation of the city in the WHO Healthy Cities Project and its aim to enhance the health of the city, its environment and its people. The draft plan also supports and facilitates the City Council's Recreational and Amenity Needs Study and the actions of the Sports Partnership in promoting healthier lifestyles.

A Health Impact Assessment (HIA) is the process where a policy, program or project may be judged as to its potential effects on the health of a population. There is no statutory requirement under the Planning and Development Act 2000 (as amended) to undertake a Health Impact Assessment (HIA) of the Plan. The Development Plan is subject to a Strategic Environment Assessment (SEA) which would have assessed the impact of draft plan policies and objectives on a number of aspects of the environment including Population and Human Health (Section 4.3 of SEA). While other aspects of the city's environment, including air quality, sustainable transportation, water quality, infrastructure provision, green network all contribute to the health and wellbeing of communities. The Council will carry a Health Impact Assessment of the Development Plan when the process is a mandatory requirement under the Planning and Development Acts. To carry out a HIA would be premature pending implementation of Directive and associated national legislation and guidelines. Policy 7.4.1 Community Facilities promotes the development of health care facilities in the city having regard to the regional role of the city and Chapter 5 Economic Activity recognises the importance of the health and education sector to the city's economy. Policy 5.1 Enterprise supports and facilitates the sustainable development of strategic health and education institutions in their primary functional roles and also their contribution to innovation, research, training and skills development. Issues

referenced in submissions with regard to intervention and prevention in a number of health related issues including alcohol use and health funding is outside the ambit of the Development Plan.

Culture:

Chapter 7, Section 7.1 identifies the city's people and culture as its greatest strengths and assets. The importance of the arts and culture is acknowledged under Section 7.2 Creative City and the policies promote the city as a centre of culture and arts excellence and support the Galway City and County Councils' Cultural Strategy 2016-2025 and its actions for all facets of culture and the Bid for European City of Culture 2020 and City Arts Plan.

Recommendations:

Proposed amendments relating to this Chapter include Amendments No's:

- A7.1
- A7.2
- A7.3
- A7.4
- A11.4
- A11.5
- A11.7
- A11.8
- A11.15

Summary of Issues Raised

Proposed Additions to Register of Protected Structures:

- Objects to inclusion of Coláiste Éinde to RPS. Claims building is in poor condition and inclusion in RPS would incur greater cost to rehabilitate the building.
- Notes the architectural features of the James Stewart Ltd. Building 43 Lower Salthill. Vast majority of building fabric consists of recent structures. Concerned that any future development of the site including building of new offices would be precluded by designation.
- Concerned over inclusion of Roscam Quay on RPS. Structure is in poor condition. Not in a position financially for continued maintenance and conservation, open to overtures from City Council to buy structure.
- Objects to inclusion of Victoria Trust Ltd, 1 Merchants Road in RPS. Suggests facade is the only architectural feature of merit and can be protected through the development management process.
- Objects to inclusion of Kilrainey Lodge, 97 Salthill Road Lower to RPS. Building has been significantly rehabilitated subsequent to flood damage in 2014. In 2001 Council rejected its inclusion in RPS. Questions architectural merit.
- Object to inclusion of 25 William Street West in RPS. Will only support inclusion if the designation relates to exterior only. Interior has no architectural merit.
- Objects to inclusion of 23 William Street West in RPS. Will only support inclusion if the designation relates to exterior only. Interior has no architectural merit.
- Objects to inclusion of 23-24 William Street West in RPS. Will only support inclusion if the designation relates to exterior only. Interior has no architectural merit.
- Objects to inclusion of Glenina House building in RPS. References previous rejection by Council for inclusion in 2005. Inclusion in RPS would negatively affect potential sales value. Indicates that building is in poor structural condition.
- Objects to RPS designation of 40 Eyre Square (Dunnes) and existing ACA designation affords adequate protection.
- Objects to inclusion of 88 Lower Salthill in RPS, as the map provided does not accurately reflect rear of properties.
- Objects to inclusion of The Croft Taylor's Hill (ref. no. RPS CDP PP33) as it would constrain future development of the site, place financial burden on the property and would be counterproductive in view the building has always been carefully preserved.
- Remove Barnacranny Thatched cottage from RPS (ref. no.1503) as property too close to N59 and is a financial burden.
- Objection to inclusion of No. 23 Eyre Square on the RPS. Could impact on sale value of property. Architectural Heritage Assessment submitted. Assessment concludes that building is of architectural significance while later buildings at the rear are of modern construction and have no feature of architectural interest and therefore should be excluded.
- Objects to inclusion of no. 17, St. Mary's Road, CDP.PPS.25 on RPS. The building has been altered significantly and is not considered of regional value or architectural interest and does not merit inclusion in the RPS. Significant internal works have also taken place over time. The curtilage and attendant grounds have been lost.

- Objects to the inclusion of no. 25, Nun's Island (CDP PPS 26) on RPS. Original structure as been altered such as extensions, replacement of rear windows and internal alterations. Full internal inspection was not carried out.
- Objects to the inclusion of Merville, Taylor's Hill as the building has been altered and little of the original fabric remaining and what is present presents little architectural merit. Privately commissioned report included.

Include Structures onto the Register of Protected Structures:

- Seeks the inclusion of Arch House in RPS.
- Include no. 13 Sandyview Drive in RPS, as it acted as first mosque in Galway.
- Protect a terrace of buildings in Bohermore which is deemed to have historic character.
- Supports the list of additional protected structures in the plan.

ACAs:

- Designate Bohermore and Forster Street as ACAs.

Urban Design:

- Insert under Policy 8.7 Urban Design new policies to support and facilitate quiet spaces and poster booths for community events.
- Include for wirescape policy.
- Include for extension as well as refurbishment of Blackrock Tower.
- Include a statement discouraging the removal of original window type and the use of UPVC or aluminium windows.
- Seeks greater reference and commitment to accessibility and ensuring a life-cycle approach to urban design.
- Seeks a greater to commitment to public consultation on all large-scale developments and to open competitive approaches to design to ensure the highest standards.
- Welcomes focus on urban design in Section 8.7 Urban Design
- Incorporate WHO health objectives outlined in *Healthy Urban Planning – A WHO Guide to planning for people* during the urban design process

Built Heritage:

- Restore the Old Dock, Longwalk as a working dock and maritime quarter.
- Survey existing old shopfronts.
- Assess the heritage value of derelict/dangerous buildings.
- Management plan required for Mutton Island.
- Develop Menlo Castle as a focus of a riverside Peoples Park from Dyke Road to Menlo Village.
- Support the aims and objectives of City Heritage Plan.
- Include in the redevelopment of Ceannt Station a plan to restore and reuse protected structures on site. Conservation Plan for Browne Doorway is required.

Response:

Proposed Additions to Record of Protected Structures:

There were in total Forty Six structures brought forward during the currency of the Draft Development Plan for consideration as proposed additions to the Record of Protected Structures (RPS). Forty Two of these structures were recommended for inclusion on the RPS by the Minister for Arts Heritage and the Gaeltacht (MAHG) who deemed them to be classified as of regional status. The full appraisals for each structure were issued to the Members in conjunction with the Draft Development Plan documents and on display during the public consultation period. Following the consultation process sixteen of the submissions received related to the proposed additions, all objecting to inclusion or suggestion of inclusion of part of the structures only. The CE report having reviewed these submissions, in conjunction with further conservation advice and consultation with the MAHG (as is required under planning legislation) continues to recommend that fifteen of these are included and that two are not.

It should be noted that in the event that the Ministerial Recommendation from the Minister of Arts Heritage and the Gaeltacht requesting inclusion of all forty two structures on the Council's RPS is not being complied with, the Council is required to inform the Minister in writing of the reasons for its decision. (Planning and Development Act 2000 as amended Section 53).

Dunnes, 40 Eyre Square. CDP PPS 2

The submission objects to the inclusion of 40 Eyre Square (Dunnes Stores) on the RPS, stating that the existing ACA designation affords adequate protection.

This Proposed Protected Structure is a Ministerial Recommendation. A specific response was received from the DAHG following their receipt of the submission. They have clarified the date of the structure to concur with that of the Council's appraisal circa late 19 century and re-affirmed the significance of the building in particular the distinctive facade which exhibits the remnants of what was an early petrol filling station which has remained unchanged.

While the ACA affords protection of the streetscape value of the structure, the inclusion of the building as a whole on the RPS is merited. This building is unique in its scale and symmetry and is highly decorated in its facade. The building also amalgamates parts of several earlier structures on the Rosemary Avenue side. It contributes to Eyre Square as a unique building in style and scale in an area of mixed architectural forms.

The protection of a facade alone is generally only considered where there is no surviving interior of any interest. Generally a facade relates integrally to its building, which may retain original elements such as walls or chimneypieces. Elements of the whole external envelope may also be of intrinsic interest and worthy of protection.

Although the Dunnes Stores building has been altered internally over the years it is likely to still retain fabric such as walls, fire breasts and other parts of the building envelope, some just covered over or concealed by fixtures of the existing use.

The aim of protection is not to inhibit development. Protected structure status ensures that any proposed development on site gives due consideration to the special interest associated with the structure. The current use and recent modifications to a use for a Dunnes Stores brand demonstrates this capability where the character is retained and the heritage value of the building complements the smart merchandise now on sale. This reflects the points raised previously

regarding the existing 587 protected structures that exist and accommodate many uses within the city centre, an area which continues to thrive and develop.

Clarity on what features are protected and the type of works which would not materially affect the character of the structure can be obtained from a Section 57 Declaration.

It is also noted that the development plan contains proactive policies to encourage the restoration of protected structures and best conservation practices. This includes potential for offsetting of development contributions if a proposal involves conservation works. Affording protection status could also provide for funding opportunities for essential conservation works through Government/Heritage Council grant schemes.

It is recommended that Dunnes, 40 Eyre Square CDP PPS 2 is added in the Record of Protected Structures.

23 Eyre Sq. CDP PPS 3

The owner of No. 23 Eyre Square objects to its inclusion on the RPS, it is claimed that such a status could impact on the sale value of the property. This submission includes an Architectural Heritage Assessment carried out on behalf of the owner. The assessment concludes that building is of architectural significance while later buildings at the rear are of modern construction and have no feature of architectural interest and therefore should be excluded.

The appraisal carried out by the Council highlights the importance of the building both internally and externally. It should also be noted that the proposed addition is a Ministerial Recommendation.

The architectural assessment submitted by the owner concurs largely with the Council's appraisal but states that *the buildings to the rear are of modern date, with the return to the rear dating to the early twentieth century at the earliest and the further office extensions to the rear of the return being of late twentieth century date. These buildings do not have any architectural features of interest, being modern in fixtures and fittings as well as fabric.*

In this regard the inclusion of the building on the Record of Protected Structures would not necessarily inhibit works to the building and/or removal of later buildings through the planning process and a Section 57 Declaration can be sought from the Council to determine the kind of works that could be carried out, without materially affecting the character of the structure.

It is not considered that protected status would impact negatively on the value of the property. It is located in a prime location in the city adjacent to many structures which have heritage protection already and are functioning in a viable, sustaining manner and retaining their commercial value.

It is noted also that the development plan contains proactive policies to encourage the restoration of protected structures and best conservation practices. This includes potential for offsetting of development contributions if a proposal involves conservation works. Affording protection status could also provide for funding opportunities for essential conservation works through Government/Heritage Council grant schemes. In addition it is acknowledged that although many buildings have the protected heritage status, this protection is only afforded to the structural elements that contribute to the original character and does not usually apply to later modifications or extensions.

It is recommended that 23 Eyre Sq. CDP PPS 3 is added to the Record of Protected Structures.

1 Merchants Road, Galway - CDP PPS 7

This submission objects to inclusion of 1 Merchants Road in the RPS. The objection argues that the facade is the only architectural feature of merit and suggests that it can be protected through the development management process. These points have been examined.

No. 1 Merchants Road is considered worthy of inclusion on the RPS notwithstanding alterations that have been made internally. This structure appears to be one of the earliest Georgian style buildings in the city and has significant historical and architectural importance. Its stonework and detailing demonstrates the craftsmanship available at the time. As highlighted in the Council appraisal "*the general rarity of Georgian buildings in Galway make this unusual example all the more significant*". This structure is also recommended for inclusion on the RPS by the Minster (MAHG) and these attributes recognised.

Given the significance of the structure, it is considered that assessment as part of a planning application may not give the Planning Authority sufficient basis to ensure the special interest of the structure is protected. Protected structure status gives legal recognition to the special character of a building and ensures that any proposed development on site gives due consideration to this special interest and protects against outright demolition. Future development is not specifically restricted and clarity on what features are protected and the type of works which would not materially affect the character of the structure can be obtained from requesting a Section 57 Declaration. Again the wealth of functioning heritage buildings with protection in the vicinity of this structure bears testimony to the ability for such buildings to adapt to new uses and also shows that value from retaining heritage character can actually add to the commercial attraction and asset.

It should be noted that the development plan contains proactive policies to encourage the restoration of protected structures and best conservation practices. This includes potential for offsetting of development contributions if a proposal involves conservation works. Affording protection status could also provide for funding opportunities for essential conservation works through Government/Heritage Council grant schemes.

It is recommended that the 1 Merchants Road, Galway CDP PPS 7 is added to the Record of Protected Structures.

23 William Street West - CDP PPS 11

This submission objects to inclusion of Number 23, Silkes Cash & Carry, on the RPS. It expresses concern that the entire building would be protected, stating that there is nothing of merit internally. The submission advocates that Galway City Council must make it unequivocally clear that the front facade of the building only should be protected.

This structure was considered of regional importance when recommended for inclusion on the RPS by the Minster for Arts, Heritage and the Gaeltacht. The Councils consequent appraisal of this structure further confirmed and highlighted the architectural interest of the structure, adding that the design contributes to the varied architectural styles in the city. It refers to the facade as being the main architectural interest of this structure.

Notwithstanding that the main interest lies in the facade of this building, it is considered appropriate to include the structure as a whole on the RPS. In general, the protection of facades alone is discouraged and would be considered only in exceptional circumstances such as where, the remaining structure has been gutted or has been completely modernised for example Steamship House on the Docks.

Again it is reiterated that the aim of protection is not to inhibit use or development of the structure. It is understood that most protected structures can only survive where they are allowed to adapt to new uses. Protected structure status ensures that any proposed development on site gives due consideration to the special interest associated with the structure which as stated in the Council appraisal is its facade. It is accepted that buildings have to be maintained and this can be achieved in a manner that will allow a structure to evolve and have viable uses while retaining its particular significance. Protected status is not a preservation status it relates more to conserving heritage features. As mentioned the current RPS contains over 587 protected structures, many of which are within the city centre, an area which continues to thrive and develop.

Clarity on what features are protected and the type of works which would not materially affect the character of the structure can be obtained from a Section 57 declaration.

It is recommended that 23 William Street West CDP PPS 11 is added to the Record of Protected Structures.

23-24 William Street West - CDP PPS 12

This submission objects to inclusion of Number 23-24 William St West, which is a 5 bay, two storey building adjoining the Silkes Cash & Carry. It expresses concern that the entire building would be protected, stating that there is nothing of merit internally, that the building suffers from water ingress and that inclusion of the entire building would be a great impediment to future investment and development. The submission requests that if protection is recommended a specific reference that the front facade of the building only should be included in any decision.

This structure was considered of regional importance when recommended for inclusion on the RPS by the Minster (MAHG). The Councils consequent appraisal of this structure further confirmed and highlighted the architectural interest of the structure, adding that the design contributes to the varied architectural styles in the city. It refers to the facade as being the main architectural interest of this structure.

Notwithstanding that the main interest lies in the facade of this building, it is considered appropriate to include the structure as a whole on the RPS. In general, the protection of facades alone is discouraged and would be considered only in exceptional circumstances such as where, the remaining structure has been gutted or has been completely modernised for example Steamship House on the Docks. This is not to infer that the all internal elements are of high heritage value but to stress that the integrity of the building is more than an exclusive elevation and can only be interpreted as being part of a full structure.

Notwithstanding this point the aim of protection is not to inhibit development. Protected structure status ensures that any proposed development on site gives due consideration to the special interest associated with the structure as many examples in the city can testify. Clarity on what features are protected and the type of works which would not materially affect the character of the structure can be obtained through a request for a Section 57 declaration.

It is noted also that the development plan contains proactive policies to encourage the restoration of protected structures and best conservation practices. This includes potential for offsetting of development contributions if a proposal involves conservation works. This has been activated for a number of developments over the years. Affording protection status could also provide for funding opportunities for essential conservation works through Government/Heritage Council grant schemes.

It is recommended that 23-24 William Street West CDP PPS 12 is added to the Record of Protected Structures.

25 William Street West - CDP PPS 13

This submission objects to inclusion of Number 25 which is a 4 bay two storey building adjoining number 23-24. It expresses concern that the entire building would be protected, stating that there is nothing of merit internally, that the building has been altered previously and that inclusion of the entire building would be a great impediment to future investment and development. The submission states that Galway City Council must make it unequivocally clear that the front facade of the building only should be protected.

This structure was recommended for inclusion on the RPS by the Minster for Arts Heritage and the Gaeltacht (MAHG). The Council appraisal of this structure highlights the architectural interest of the structure, that the former store contributes to the varied architectural styles in the city. It refers to the facade as being the main architectural interest of this structure acknowledging that the interior has been modernised over the years.

Notwithstanding that the main interest lies in the facade of this building, it is considered appropriate to include the structure as a whole on the RPS. In general, the protection of facades alone is discouraged and would be considered only in exceptional circumstances such as where, the remaining structure has been gutted or has been completely modernised for example Steamship House on the Docks.

The aim of protection is not to inhibit development. Protected structure status ensures that any proposed development on site gives due consideration to the special interest associated with the structure which as stated in the Council appraisal is its facade. It is accepted that buildings have to be maintained and this can be achieved in a manner that will allow a structure to evolve and have viable uses while retaining its particular significance. The Development Plan contains over 587 protected structures, many of which are within the city centre, an area which continues to thrive and develop.

It should be noted that the development plan contains proactive policies to encourage the restoration of protected structures and best conservation practices. This includes potential for offsetting of development contributions if a proposal involves conservation works. Affording protection status could also provide for funding opportunities for essential conservation works through Government/Heritage Council grant schemes.

It is recommended that 25 William Street West CDP PPS 13 is added to the Record of Protected Structures.

James Stewart Ltd 43 Lower Salthill, Galway -CDP PPS 16

The submission notes the architectural features of the James Stewart Ltd. Building 43 Lower Salthill stating that the building has been altered on a number of occasions. According to the owner except for the cut stone front façade, the lettering on the façade, front entrance porch including polished stone tiled floor and timber doors and panelling, the side facade including the canopied door opening and windows on either side, that the vast majority of the building fabric at no. 43 was constructed in the Seventies. The submission expresses concern that any future development of the site including building of new offices would be precluded by inclusion on the RPS.

The contents of the submission are noted and it is recognised that the building has been much altered. Notwithstanding this, the Council's appraisal highlights the distinctiveness of the building in

the locality with the main interest being the stone detailing in the front elevation and the Art Deco style lettering. In this regard the inclusion of the structure on the RPS is merited.

The aim of protection is not to inhibit development. Protected structure status ensures that any proposed development on site gives due consideration to the special interest associated with the structure. It should be noted that there are currently 586 structures included in the RPS, many of which are in use for commercial purposes and have changed use and structural elements over the years within the framework of protection. Future development on this structure is not specifically restricted and protected status should not inhibit works to the building and/or removal of more modern additions through the planning process. Clarity on what features are protected and the type of works which would not materially affect the character of the structure can be obtained from a Section 57 Declaration.

This structure was recommended for inclusion on the RPS by the Minister for Arts Heritage and the Gaeltacht and the Council's appraisal has further affirmed the merit of building and has also, at a preliminary examination highlighted elements that are not considered to be of any architectural merit and could be altered without constraint.

It is recommended that James Stewart Ltd 43 Lower Salthill, Galway CDP PPS 16 is added to the Record of Protected Structures.

88 Lower Salthill - CDP PPS 19

The owner objects to the inclusion of 88 Lower Salthill in the RPS on the grounds that the map accompanying the proposed addition does not accurately reflect the rear of both properties located at 86/88 Lower Salthill. The owner is concerned that problems will arise down the road if the properties were to be sold and the map was not amended.

The map which accompanies the Proposed Addition to the RPS namely 88 Lower Salthill PPS 19 is the latest update of the Ordnance Survey map (2015). The exact nature of the stated inaccuracy has not been detailed by the owner, however in any case, the claim regarding the background mapping is not a valid reason for excluding the building from the RPS. Nor could this location map ever be used as a definition of land registration /ownership. In terms of inclusion on the RPS, the map highlights the building and its location, rather than the site ownership, therefore regarding any future sale, the nature of what the designation relates to would be clear.

This proposed addition is a Ministerial Recommendation and the Council's appraisal supports this recommendation. The building has significant architectural merit for inclusion on the RPS. It is one of a simple, well proportioned, matching pair of structures and forms an elegant landmark in the streetscape.

It is recommended that 88 Lower Salthill CDP PPS 19 is added to the Record of Protected Structures.

Coláiste Éinde, Threadneedle Road, Galway - CDP PPS 20

This submission objects to the addition of Coláiste Éinde to RPS, on the grounds that such protection would be "unfair and unreasonable". It claims that the building is in poor condition and inclusion in the RPS would incur greater cost to rehabilitate the building. It also states that the ball alleys are of poor construction and their preservation is not possible.

The argument presented is noted. However the structure is of great significance to the City. In addition to being a Ministerial recommendation which has assessed the early 20th century buildings

as having considerable architectural interest, the Councils own appraisal has further highlighted the social and historical value of the building.

The aim of protection is not to inhibit the schools development but to ensure that any such development is carried out with due regard to the important values associated with the building. As the Secondary School still retains its original form and has been in use predominantly since its construction as a school, it is not considered that heritage protection will diminish its ability to continue to grow and function as an educational facility. Many educational establishments in the city, county and state continue to flourish despite being housed partially or wholly in such protected structures. While the objection raises cost and funding issues, essential maintenance and repair will be necessary regardless, to allow for its continued use and will not be generated by inclusion on the RPS. The Department of Education & Skills funding is not determined by whether or not a structure is included on the RPS. It is accepted that all buildings have to be maintained and this can be achieved in a manner that will allow a structure to evolve and have viable uses while retaining its particular significance. Affording protection status could provide for new funding opportunities through Government/Heritage Council grant schemes.

For comfort and to recognise what works are exempt from permission or particular conservation treatment an owner/occupier of a protected structure can seek a Section 57 Declaration from Galway City Council, which indicates the kind of works which would not materially affect the character of the structure.

It is recommended that Coláiste Éinde, Threadneedle Road, Galway CDPPPS 20 is included in the Record of Protected Structures.

Roscam Quay, Roscam, Galway - CDP PPS 22

The submission expresses concern over inclusion of Roscam Quay on RPS, stating that the structure is in poor condition. It is stated that the owner is not in a position financially for continued maintenance and conservation and is open to overtures from the City Council to buy the structure.

This 19th century structure recommended for inclusion on the RPS by the Minister for DAHG (MAHG) was further examined by the Council. The Councils own appraisal expanded on the value of this heritage structure highlighting the architectural, social and technical value of the structure adding that it is a unique and an attractive landmark in the locality. The quay reflects the former importance of commercial maritime activity in Galway Bay and is important for its rarity in a city setting. The condition of the structure is acknowledged as having deteriorated, particularly following the severe storms in recent years. Notwithstanding this, it is worthy of inclusion in the RPS and affording protection status preserves the remaining distinctive heritage legacy and could also provide for funding opportunities for essential conservation works through Government/Heritage Council grant schemes. Options to sell the quay or for the Council to purchase the quay are noted but are not for consideration within the ambit of the Draft Development Plan process.

It is recommended that Roscam Quay, Roscam, Galway. CDP PPS 22 is added to the Record of protected structures.

17 St. Mary's Road - CDP PPS 25

The owners of the building, object to the inclusion of 17 St. Mary's Road on the RPS. They believe the building's inclusion is an error based on the default approach to inclusion and not on an appropriate assessment of the structure. They suggest that this building, particularly because of its transformation and evolution over time, does not at this stage, merit being included in the RPS or being attributed architectural interest. In relation to the surroundings, the submission states that the

structure sits incongruously out of character with the different terrace on either side and that it is out of character in style, alignment of building line, and scale with its neighbouring buildings

This Proposed Protected Structure was recommended by the Minister for inclusion in the RPS. However the arguments made in the submission have validity. The building has undergone a number of significant alterations with later additions and numerous alterations which has resulted in the original structure being overwhelmed by new build and in the process lost most of its original attraction over time.

The Council's appraisal did highlight some of the attractive elements such as bay windows and the double fronted front elevation. However the argument is accepted that the culmination of both old and extensive insensitive additions impacts the totality of the heritage value.

Having assessed the submission received and having regard to the Council appraisals, it is considered that given the significant loss of character through major alterations and the later additions to 17 St. Mary's Road PPS 25, the structure, that it does not merit inclusion on the RPS notwithstanding the recommendation of the minister for inclusion. In this instance there is a sufficient defensible case to be made to Minister to convey why inclusion is not recommended

It is recommended that 17 St Mary's Road CDP PPS 25 is not added to the Record of Protected Structures.

25 Nun's Island - CDP PPS 26

This submission objects to the inclusion of no. 25, Nun's Island on the RPS stating that the original structure has been altered with extensions, replacement of rear windows and internal alterations. This Proposed Protected Structure is a Ministerial Recommendation and the Council's appraisal further supports this recommendation.

The appraisal refers to the NIAH survey which states that *the scale and form of this early nineteenth-century Georgian building make it a notable feature of the streetscape. The house has retained its timber sash windows and fine Georgian-style door-case. The front garden, with its fine spear-headed railings considerably enhances the setting.*

Notwithstanding the changes that have been highlighted in the owners submission, the building has been very well maintained and retains a considerable amount of the original features and character and contributes to the streetscape which contains buildings of a similar scale and vintage, some of which are already protected structures.

As stated in response to objections to other similar structures, the aim of protection is not to inhibit development. Permissions granted for significant changes and modernisation to protected structures along this street have demonstrated this fact. Protected structure status can enhance a structure and afford opportunities for funding for conservation works. It ensures that any proposed development on site gives due consideration to the special interest associated with the structure. Clarity on what features are protected and the type of works which would not materially affect the character of the structure can be obtained from a Section 57 declaration.

It is recommended that 25 Nun's Island CDP PPS 26 is added to the Record of Protected Structures.

Merville, Taylors Hill, Galway - CDP PPS 32

The submission objects to 'Merville' being added to the RPS on the grounds that while the house was constructed circa 1831, it states that little or nothing of the original house now remains. The submission includes a report prepared by Conservation Architects that was commissioned by the owner to support this argument. It concludes that the house has suffered a major loss of character over time with significant documented renovations and alterations carried out since its acquisition by the current owner in 1976. The Conservation Architects report provides illustrations to support this claim and also that the outbuildings have been considerably altered in the 20th century which it states has resulted in a significant loss of character.

This report has been examined in detail and further assessed by the experts engaged by the Council. The report including the detailed internal assessment carried out on behalf of the owner does substantiate the case made in the submission. It is considered that "Merville" has suffered a significant loss of character. This has been exacerbated by the later additions to the building which have been done in a particularly intrusive manner. In view of the documented replacement, of what would be the original distinctive features both externally and internally in the house and the compromising nature of the modern additions to what is a structure defined exclusively of merit on architectural terms, it is considered that the house therefore should not be considered for inclusion on the RPS notwithstanding the recommendation of the Minister. In this instance there is a sufficient defensible case to be made to Minister to convey why inclusion is not recommended.

It is recommended that Merville, Taylors Hill, Galway, CDP PPS 32 not be placed on the Record of Protected Structures.

The Croft Taylor's Hill - CDP PPS 33

The owners request that the Croft be removed from the proposals for addition in the RPS, expressing concern that the curtilage will also be protected and that the property in its entirety will be subject to RPS constraints and preclude additional development in the grounds. They believe that it is unnecessary to list the building as the owners have carefully preserved it up to now and that protecting the building would be counterproductive as it would elevate the cost of maintenance.

These are not considered good reasons for not including the structure on the RPS. Irrespective of an RPS designation, a proposal for development within the grounds would most likely require planning permission and would consequently require assessment on a range of planning issues.

The Council appraisal of this structure highlights the significant architectural and artistic value of the structure. It should also be noted that the proposed addition is a Ministerial Recommendation classed as having regional importance.

As set out in the Council's appraisal, the house is well proportioned and retains many original features which give it character. The house also displays high craftsmanship in internal features such as decorative plasterwork, the staircase, fireplaces doors and windows all of which merit the inclusion. It is acknowledged that the owners have diligently maintained the structure to a very high standard.

It is not considered that protected status would impact unduly on the structure. Essential maintenance and repair will be necessary regardless of its status. Affording protection status could provide for new funding opportunities through Government/Heritage Council grant schemes. The aim of protection is not to inhibit development and does recognise the needs of modern lifestyles

and need for certain adaption. Protected structure status ensures that any proposed development on site gives due consideration to the special interest associated with the structure for which it is apparent the owners have had due regard to date.

It is recommended that The Croft Taylor's Hill CDP PPS 33 is added to the Record of Protected Structures.

Kilrainey Lodge 97 Lower Salthill, Galway - CDP PPS 37

This submission states that Kilrainey Lodge has been renovated and altered over the years and significantly altered subsequent to flood damage in 2014 and does not merit inclusion on the RPS. It also refers to a previous decision by the Elected Members to reject a proposal to include it on the RPS in 2001.

That the value of Kilrainey Lodge was recognised in 2001 by the Council is correct. This second attempt to protect the structure is now being recommended specifically by Ministerial request where it has been declared of regional significance. The failure to include previously on the RPS has not diminished this value. Notwithstanding the alterations that have been made internally it is still considered worthy of inclusion on the RPS. The structure has both architectural and historical interest. The Council's appraisal highlights the distinctive style of the building – an attractive late Victorian house with fine external stonework, unusual for Galway City. In their appraisal the NIAH stated *this attractive house contributes to the architectural diversity of the streetscape. It presents well-executed stonework enlivened by red-brick details, both materials also giving textural variety to the streetscape.*

The building is also of particular historic interest because of its association with the tram network being formerly a tram driver's cottage and is a notable attractive landmark in Salthill marking the legacy of the historic importance of this seaside resort.

It is recommended that Kilrainey Lodge 97 Lower Salthill, Galway, CDP PPS 37 is added to the Record of Protected Structures.

Glenina House, Galwegian's RFC, Dublin Road, Galway - CDP PPS 40

The submission objects to inclusion of Glenina House in RPS. It also refers to a previous decision by the Elected Members to reject a proposal to include it on the RPS in 2005. It states that inclusion in the RPS would negatively affect potential sales value and indicates that the building is in poor structural condition.

There have been significant changes to the interior of the original building, including the knocking of walls, relocation of fireplaces. Despite this the house still reflects the strong character of the late Victorian era, it is well proportioned and remains an attractive building. As highlighted in the Council's appraisal, the buildings, including the outbuildings, are of architectural, social and cultural interest. The farm buildings directly to the north of the house are of interest as they are earlier in date from that of the house.

It is not considered that protected status would impact unduly on the value of the overall property which constitutes a site of over 9 acres. A previous grant of permission in 2000 in fact included the building in the overall layout of a 68 house development at no detriment to the development standard. (Pl. Ref. 00/584).

Affording protection status could provide for new funding opportunities through Government/Heritage Council grant schemes. With regard to the condition of the buildings, essential maintenance and repair will be necessary regardless, to allow for their continued use. It is

accepted that buildings have to be maintained and this can be achieved in a manner that will allow a structure to evolve and have viable uses while retaining its particular significance.

It is noted that the Elected Members previously rejected the recommendation to include this structure on the RPS, it is considered that the structure still retains the values which merited the original recommendation in 2005. It should also be noted that the Minister has recommended this structure for inclusion on the RPS and deemed it to be of regional significance.

It is recommended that Glenina House, Galwegian's RFC, Dublin Road, CDP PPS 40 is added to the Record of Protected Structures.

Other:

Thatched Cottage at Barnacranny, Bushypark, Galway RPS (ref. no.1503)

This is an existing protected structure and the owner objects to it being on the RPS. The owner requests that this cottage be deleted from the RPS stating that given its small size and poor accessibility, it has no viable use. Access is suggested to be poor and the only door to the cottage opens directly out onto a narrow footpath of a busy main road. The owner also refers to maintenance costs and the financial burden of the structure.

The cottage has significant heritage value. It dates to c1800. In form it is a single storey, three bay, double fronted cottage with a lean-to structure/outbuilding attached to the east gable. The cottage was typical of the modest vernacular-style house in Ireland, having a thatched roof and being single-story with a rectangular-plan. It is of a western regional style which includes a gable-end chimneystack.

Contrary to the owner's statement, the main door of the cottage does not open directly onto a narrow footpath but is set back from the roadway behind a low rubble wall. There is a wrought iron gate set between two rubble piers to the east of the cottage which allows access from the road in to the site. A survey carried out by the Council in 2013 of thatched cottages in the city includes images and a survey of the cottage. It states that the roof was thatched in 2011 and that the thatch is in good all round condition, however it was noted in the survey that the exterior gable chimney stonework was loose. Notwithstanding this, the cottage has not suffered a significant loss of character which would warrant its removal from the RPS. Its presence along the national route entering the city adds to the architectural heritage of the city and contributes to the areas character. It should be noted that the owner has received specific conservation grants in the recent past for works to the structure.

As the cottage is of vernacular architectural interest and is one of only a small number of thatched cottages remaining in the city, it is not recommended that the structure be removed from the RPS.

Inclusion of Structures onto the Record of Protected Structures:

A submission received requested that Arch House, located off Shantalla Road, be included on the RPS. It should be noted that this structure was not included in the Ministerial Recommendations to add structures to the RPS so was not brought forward with the current list.

It is considered that the structure may have heritage merit and in order for the architectural and historical value of this building to be fully assessed, a full appraisal including a site assessment would be required. This has been carried out for all the current proposals. Given the timescales involved, it would be more appropriate to consider suitability for inclusion onto the RPS outside of the Development Plan process (under Section 55 of the planning act 2000) in order to allow adequate

assessment and give owners/occupiers and relevant prescribed bodies an appropriate consultation period. The making of an addition is a reserved function, therefore any future addition, should it merit same, will come back before the Elected Members for their decision.

A submission received requested that 13 Sandyview Drive is included on the RPS.

13 Sandyview Drive is a detached two bay two story house of mid 20th century date located in a large housing estate of similar buildings and is by no means unique. While it has some cultural associations with the Muslim Faith in Ireland, it does not contain any significant features which would merit its inclusion in the RPS being of modern standard construction. It is therefore not recommended for inclusion in the RPS. To mark the importance of the building to the Muslim community, a plaque at this location could be considered. This would be a matter which would not come under the ambit of the Development Plan.

With regard to another submission in relation to the terrace of buildings in Bohermore, it is similarly considered that these structures are not deemed to be of sufficient architectural or historical merit to warrant inclusion in the RPS.

With regard to designation of Bohermore and Forster Street as ACAs, these areas are not considered to meet the criteria for assessment for ACA designation.

Comments included that support the list of additional protected structures in the plan is noted.

Urban Design:

Policy 8.7 refers to the Shopfront and Signage Guidelines which includes advice and guidance on utilities and services including wiring and cabling. The proposed Public Realm Strategy will further inform the approach to wirescape which is merely one element of the public realm. It would not be appropriate to include a policy in advance of this strategy.

With regard to the specific request for an inclusion for an extension as well as refurbishment of Blackrock Tower, the Council do not have any plans for such an extension, therefore a reference to extension is not merited and would be misleading.

Standards set out in Chapter 11, Section 11.15 Built Heritage states that ... *replacing original windows with those of a different material, e.g. aluminium or PVC, is not normally acceptable in protected structures*. The conservation of original windows and other elements that contribute to the character of structures is also referred to in section 8.4 Vernacular Heritage. It is felt that this is sufficient reference to address the issues raised in the submission.

The comments relating to commitment to accessibility are noted. The Plan however has commitment to accessibility which permeates all aspects of the Development Plan. Section 8.7 Urban Design together with policies in Chapter 2 in relation to creation of sustainable neighbourhoods supports a life cycle approach to urban design.

Consultation is statutorily provided for in all aspects of the planning process. A strategic goal of the plan is to encourage a sense of collective identity through civic engagement.

Opportunities for innovative architecture and design competitions are specifically referenced in Chapter 10.

There are a range of urban design guidelines available to advise on good urban design, it is considered that those referred to in the plan which are national guidelines are the most appropriate for inclusion.

With regard to inclusion of polices to support and facilitate quiet spaces and poster booths for community events, these are overly specific and it is not considered appropriate to promote these over other types of spaces/community facilities.

Built Heritage:

With regard to the restoration of the old dock/mud dock, any proposals brought forward for works/restoration will be considered having regard to the nature of any proposed works, its location within the Long Walk Architectural Conservation Area, the protected status of the quay wall, accessibility, recreation and amenity issues and any other issues arising. However these are more appropriate to be considered as part of a planning application which most likely would be required for such uses.

Chapter 2 refers to Menlough Castle and recognises the potential of the castle and adjoining lands for use for recreation and amenity purposes. It is a specific objective of Chapter 8 to facilitate the restoration of the Castle, for public use and to allow for new uses, in particular cultural/recreation uses. A river side park was not deemed a requirement under the Recreation & Amenity Study which comprehensively assessed the recreation and amenity needs for the city. The lands along the river are zoned for RA and as high amenity agricultural lands which contribute to the overall green network of the city.

The Development Plan includes specific support for the aims and objectives of City Heritage Plan in chapter 4 and 7.

With regard to the protected structures at Ceannt station, chapter 10 specifically refers to the architectural heritage of the site and requires that it be a major consideration in any development proposal and that opportunities for the re-use and the re-establishment of relationships between these structures be explored in any design and layout.

A Draft Conservation & Management Plan for the Browne Doorway has been prepared and is being currently being examined for finalisation.

With regard to Mutton Island, it is not proposed to prepare a management plan. The built heritage element on the island is the Light House keepers house. Significant costs have already been expended to preserve this structure and the long term use is a consideration of the Museum Strategy .

Requests for a survey of existing old shopfronts and an assessment of the heritage value of derelict/dangerous buildings would be more appropriate as actions of the Heritage Plan.

Recommendation:

Set out in the table is a summary of recommendations of the Chief Executive in response to submissions received to the Proposed Protected Structures. These recommendations had regard to the content of the submissions, observations of the Minister for Arts, Heritage and the Gaeltacht, detailed appraisals of the structures and advice of Cathal Crimmins, Architect and Historic Building Consultant and Dr. Jim Higgins, Heritage Officer.

PPS Ref. No.	Proposed Protected Structure	CE Recommendation to Include on RPS	Submission Ref. No.
CDP PPS 2	Dunnes Stores, 40 Eyre Square.	Yes	DDP.17.095
CDP PPS 3	23 Eyre Sq	Yes	DDP.17.095
CDP PPS 7	1 Merchants Road, Galway.	Yes	DDP.17.020
CDP PPS 11	23 William Street West	Yes	DDP.17.043
CDP PPS 12	23-24 William Street West	Yes	DDP.17.044
CDP PPS 13	25 William Street West	Yes	DDP.17.042
CDP PPS 16	Stewarts, 43 Lower Salthill,	Yes	DDP.17.008
CDP PPS 19	88 Lower Salthill	Yes	DDP.17.155
CDP PPS 20	Coláiste Éinde, Threadneedle Road,	Yes	DDP.17.005
CDP PPS 22	Roscam Quay, Roscam,	Yes	DDP.17.017
CDP PPS 25	17 St. Mary's Road	Recommend not to include on RPS	DDP.17.239
CDP PPS 26	25 Nun's Island	Yes	DDP.17.241
CDP PPS 32	Merville, Taylors Hill,	Recommend not to include on RPS	DDP.17.024
CDP PPS 33	The Croft Taylor's Hill	Yes	DDP.17.228
CDP PPS 37	Kilrainey Lodge, 97 Lower Salthill	Yes	DDP.17.023
CDP PPS 40	Glenina, Dublin Road	Yes	DDP.17.056

Note: Council Members will be required to make a decision at this stage as to whether or not to add the Proposed Protected Structures onto the Record of Protected Structures. Unlike Material Amendments to the Draft Plan, there is no consequent consultation process associated with the Proposed Protected Structures.

Chapter 9 Environment and Infrastructure

Summary of Issues Raised

Climate Change Adaptation:

- Need to reference climate change in each chapter of the Plan and for development to consider climate change, reduce greenhouse gases and transition to a low carbon future.
- The policy context of the Plan should include Amsterdam Treaty 1997, Gothenburg Declaration 2001, Kyoto Treaty, and National Climate Change Strategy 2000, EU Air Quality, Noise, SEA, EIA, Waste and Water Framework, Birds and Habitats Directives, National Spatial Strategy in order to avoid future legal liability for non-compliance of EU Directives with regard land use planning, transport infrastructure and traffic management.
- Make reference to the *National Climate Change Adaptation Framework, 2012*.
- Include a policy in section 9.2 expressing the Council's commitment to climate adaptation and the preparation of local adaptations plans.

Energy Efficiency:

- Seeks reference to ensuring Galway is an Oil Free City by 2030 and an action plan to ensure this is achieved; the establishment of solar power targets and an action plan to ensure this is achieved; a commitment to a Corrib and Canal Hydropower Project; benchmarking carbon emissions and monitor reductions; undertaking the measurement of ecological footprint; frequent hazardous waste collections; and the establishment of a Resource Recovery Park.
- An energy policy for all buildings, private and public should be included in the Plan. Enhance Policy 9.5 to achieve internationally recognised Passive House standard.
- Suggests retitling of 9.4 Renewable Energy to 9.4 Renewable Energy and Energy Efficiency.
- Insert new policies under Policy 9.4 Renewable Energy to support and facilitate the promotion of low energy lifestyles, energy efficiency, replacement of open fire places with stoves in dwellings, clean solid heating fuels, locally-sourced bio-energy, electricity auto-production, anaerobic digestion, micro-generation energy co-ops, and smart micro grid for Galway.
- Insert new policies under Policy 9.14 Energy and associated infrastructure to support and facilitate single wind turbines, micro-generation energy co-ops, and energy storage projects.

Energy and associated Infrastructure:

- Welcomes Policy 9.14 Energy and Associated Infrastructure, which demonstrates support where appropriate for the provision of energy networks.
- Welcomes the recognition in the Plan of the DECLG Circular Letter 07/12 regarding Telecommunications.
- Amend reference to Grid 25 Strategy to refer to emerging Draft Grid Development Strategy Your Grid, Your Views, Your Tomorrow (2015) and refer to Government White Paper on Energy Dec 2015.

Infrastructure – General:

- Endorses the strategic goals for future use of infrastructural resources set out in the Plan.
- Suggests revisions to text of Section 9.7 Water Services including reference to the aim of IW to endeavour to secure the provision of the infrastructure necessary to support the evolving population change and economic activity over the next plan period, subject to the availability of capital investment.
- Insert under Policy 9.7 Water Services new policies to support the ceasing of fluoridation of the public water supply, the replacement of lead pipes in the water distribution network,

rainwater harvesting, grey water recycling, public water drinking water dispensers, compost toilets, plant-based and wastewater treatment.

- Argues that Policy 9.13 should be expanded to include all visible services infrastructure in the public realm.
- The requirements of Policy 9.13 in terms of co-location, reduction of infrastructure, detailed technical justifications for new ESB Telecoms infrastructure is acceptable and in line with ESB Telecoms Policy.

Noise:

- Include policy to control the level of sound/music generated from commercial premises.
- Consider whether review of Noise Action Plan 2013-2018 is required taking into account the proposed extension of port, rail and road transportation infrastructure within the lifetime of the Plan in terms of assessing any potential for additional noise nuisance and providing the appropriate mitigation to minimise any disturbance.

Other:

- Seeks insertion under Aim 9.1 Environment and Infrastructure that the Council reaffirms its commitment to making the city a nicer place to live, work and visit and ensure that investment in infrastructure meets the needs of both resident and visitor populations alike.
- Insert under Specific Objectives 9.15 a new objective to expand Local Agenda 21 scheme and green community events.
- In relation to *Specific Objectives 9.15: Complete the Sailin to Silverstrand Coastal Protection Scheme and walkway from Blackrock to Silverstrand* highlights that an NIS is required for the foreshore component of this development in connection with the foreshore licence. The development is located within two European sites, and will have direct and permanent effects, and possible indirect and in combination effects, on the conservation objectives of these sites. Some of these conservation objectives may also be adversely affected in the case of the Galway Harbour Extension project.

Response:

Climate Change Adaptation:

The challenge of climate change is reflected in the strategic goals of the Core Strategy; Strategic Goal no. 3 which promotes the reduction of greenhouse gas emissions through proactive measures in line with EU commitments to tackle climate change and reduce vulnerability to harmful effects of climate change, in particular sea level encroachment and extreme weather events, through specific adaptation measures. Climate change resilience permeates the Plan, and is specifically referenced in Section 9.2 Climate Change Resilience, SEA and SFRA. Policies in other sections of the Plan with regard to land use, sustainable transport, green network, green and blue spaces, sustainable energy sources, energy conservation, green design, flood risk and sustainable urban drainage systems (SUDS) all contribute to the city's climate change resilience. The Context of Section 9.1 references the National Climate Change Adaptation Framework 2012 nevertheless an amendment is recommended to the Draft Plan, referencing Galway City's commitment to the implementation of the *National Climate Change Adaptation Framework, 2012* in Section 9.2 and the imminent associated guidelines.

Energy Efficiency:

Section 9.4 Renewable Energy of the Draft Plan seeks to promote and facilitate the development of different renewable sources of energy within the city in order to create sustainable alternatives to fossil fuels. Section 9.5 seeks to promote improved energy performance in all future buildings in the city by encouraging energy efficiency and conservation. A number of different renewable energy

sources are stated in the text as examples of different methods of energy creation including those renewable energy sources mentioned in submissions. The list of examples in the Draft Plan is not exhaustive as technology steadily advances in this field. Section 11.18 Renewable Energy Sources sets out the development control standards for renewable energy sources, while Section 11.19 Green Design allows the consideration of innovative low carbon and green design features. The development of single wind turbines and micro-generation energy sources is exempted development under planning regulations.

Energy and associated Infrastructure:

The submission from Eirgrid supported and welcomed the policies under Policy 9.14 Energy and Associated Infrastructure. It is proposed to amend Policy 9.14 and omit a reference to *Grid 25 Strategy* and to refer to emerging *Draft Grid Development Strategy Your Grid, Your Views, Your Tomorrow (2015)* which was not published at the time of the Draft Plan.

Infrastructure – General:

Policies under this topic were supported by some submissions. Some amendments will be included in Section 9.7 Water Services in response to suggested revisions to text by Irish Water including a reference to the aim of Irish Water to endeavour to secure the provision of the infrastructure necessary to support the evolving population change and economic activity of the city over the next plan period, subject to the availability of capital investment. Water conservation, rainwater harvesting and grey water usage is supported in Policy 9.7 Water Services, Policy 9.8 Suds and Section 11.19 Green Design. Other issues raised such as fluoridation of water supply are operational and are outside the remit of the Development Plan.

Noise:

Noise is addressed in Policy 9.10 Air Quality and Noise. Policy 9.10 seeks to ensure that the design of development incorporates measures to minimise noise levels in the design and reduce the emission and intrusion of any noise or vibration which might adversely impact on residential amenities, where appropriate. The Noise Action Plan assesses environmental noise source as defined under the Environmental Noise Directive (END) 2002/49/EC. The inclusion of additional environmental noise sources may be considered in future Noise Plans. In the Galway City Noise action Plan, noise maps were prepared for environmental noise sources within the city boundaries i.e. major roads, in this regard it is noted that the airport lies outside of the City Council administration area. Policy 9.10 states that the City Council's Noise Action Plan will be considered in the assessment of development applications.

Other:

The aim of Chapter 9 Environment and Infrastructure is *“To secure a high quality, clean and healthy environment, while facilitating the sustainable development of the city”* for the benefit of all. The policies of the Development Plan support the move towards a low carbon based economy. Local Agenda 21 is addressed in the LECP and is central to the Development Plan preparation process in terms of public consultation.

Recommendations:

Proposed amendments relating to this Chapter include Amendments No's:

- A9.1
- A9.2
- A9.3
- A9.4, A9.5, A9.6, A9.7 and A9.8

Chapter 10 City Centre/Area Based Plans

Summary of Issues Raised

City Centre:

- Remove car parking from Woodquay and replace with a pedestrian friendly environment.
- Improve amenity of Woodquay park and Corrib riverbank. Provide for weekend market at Potato Market
- Bowling Green urgently requires an enhancement scheme to address issues such as amenity, traffic and surface water flow. Supports improvements to public and sustainable transport to improve the amenity of the historical city centre.
- Insert in Chapter 10, Policy 10.2 in relation to improvement schemes reference to Whitehall.
- Increase residential development in city centre.
- Amend Section 10.2 City Centre to include specific reference to tourist accommodation.
- Extend pedestrianised area and improve permeability and traffic management.
- Significant improvements required to Father Griffin Park, to pavements in the area, street lighting and to improve accessibility for all users.
- Maintain and improve urban green spaces and community centres in the city.
- Regeneration of the block of land fronting onto and behind Eyre Square East /Prospect Hill approx. 2.6 ha. Is inhibited by a fractured urban grain and poor quality pedestrian permeability. Elements of a regeneration master plan for the area are outlined which include for a new mixed use urban quarter including for new pedestrian access links focusing on a public square at the old St Patricks Church and the newer church to be re-housed within the scheme. Requests that the CDP include for policies and /or a specific development objectives that would designate the block as suitable for Urban Renewal of the nature described in the masterplan.
- A new demand for FDI type office space in city centre is noted where acute shortage in supply is recorded.
- Doubt is cast on the deliverability of regeneration at Ceannt Station, Inner Harbour, Headford Road. It is stated that the block of lands at Eyre Sq. East don't have same constraints and has equal potential to be identified as a new urban quarter. Gives example of lands which have similar characteristics and have been re-developed in Belfast, Cork Edinburgh.

Harbour/The Docks/Ceannt Station:

- Seeks that Ceannt Station and Inner Harbour Area be developed before Ardaun in view of their city centre location and both areas should be part of an overall sustainable development framework.
- Supports Galway Harbour extension as it offers the opportunity to develop a modern, high quality, sustainable city centre.
- There is limited public access to facilities at the Docks and Claddagh Basin.
- Reserve area at Claddagh Basin and New Dock for traditional boats and accommodate commercial boats, such as cafe boats, ferries, tour boats, within Claddagh Basin and New Dock.
- Provide marina boating facility in docks.
- City Council should take lead role in preparing a masterplan for Inner Harbour area.
- Discussion is required regarding the preservation of docks and quay walls.

- Need for an integrated plan for Ceannt Station, The Docks and Eyre Square and need for Galway Dockland Development Plan.
- Potential to site social and cultural development projects in the Docks area to increase cultural tourism.

The West:

- Development Plan should accommodate preservation of current development and expansion of new development. Preserve and protect the character of The West and improve traffic management and carry out public realm improvements.
- Include specific proposals for The West End. Include for improved signage, street lighting and street furniture.
- Promote the West area as an arts, cultural and historical district, mark historical sites and support regeneration incentives and environmental improvements for the area.
- Review car parking charges and parking management in the West .
- Impose a one way traffic system in the area and include bike scheme docking station in The Small Crane and a bus stop on Sea Road.
- Support improvement in footfall to The West area through investment.
- Retain and improve connections across the river to the West.
- Include for increased and improved signage is required in the West.
- Build car park on west side of the city e.g. Connaught Laundry site.
- Improved infrastructure and public realm is required to complement existing community and business development in the West to enhance this area as a destination.
- Identify and interpret Old Galway history sites e.g. the Small Crane.
- Public realm improvements are required which reflect the culture and identity of the West.
- Pedestrianise the Crane Square and create an attractive space.

Ardaun:

- Designate Ardaun LAP lands as opportunity site to encourage their expedient development. Seeks a site specific objective for retail development on site which would act as a catalyst for the development of LAP lands.
- Ensure future development at Ardaun complies with Spatial Planning and National Roads Guidelines for Planning Authorities (DECLG/DTTS 2012).
- The entirety of the Ardaun area, land within the city and county administration areas, should be included in the proposed LAP.
- Questions the location of Ardaun in view of transport accessibility as it not located on rail line.
- Ardaun should be designated for longer term future development lands/strategic land bank.

Murrough:

- Extend the boundary of the Murrough LAP area to include the Ballyloughaun area, to allow for future integrated recreation and amenity development. Retain current RA zonings in this area.
- Insert a new policy under Section 10.6 regarding rail and public transport links from the city centre to Murrough and provision of recreation and tourism amenities in Murrough LAP.

- Recreation development of GMIT lands at Murroogh (8.3 ha/20 acres) were deemed premature pending the preparation of LAP for the area. Notes there is a similar objective in the draft CDP to prepare an LAP and that in advance of LAP developments described as minor can only be advanced. Requests an objective to allow for sporting and recreation activities to occur on these lands in advance of adoption of an LAP– uses which by their nature are claimed to be reversible.

Other:

- Amend wording of Section 10.2.4 and Section 11.9.4 with regard to the requirement to have minimum content of 30% objective in area zoned CI adjoining the Headford Road to state that this requirement would not apply in the case of alterations to or extension of commercial buildings. This would provide clarity with regard to future development proposals.
- Insert a new policy in Section 10.3 to enhance way finding and public access to Salthill from city centre through: expansion of public bike scheme to Salthill; development of the city centre to Bearna greenway; improved frequency of public transport services from the city centre to Salthill; expansion of the cycleway and pedestrian walk way along the coast.
- No provision for significant public consultation in the preparing of master plans for new suburbs.
- Incorporate requirements of the SEA, Floods, Water Framework, EIA and Habitats Directives as relevant for LAPs, master plans and significant infrastructure related projects such as road improvements, rail (Ceannt Station) and port related extension developments.
- Incorporate Health Impact Assessment into area based plans.
- Strengthen and define different neighbourhoods in the city to aid navigation.

Response:

City Centre:

In response to submission regarding Woodquay reference is made to Section 10.2.5 in the Draft Plan. It refers to Woodquay and opportunities for civic improvements and improvements to residential amenity. An environmental Improvement Scheme is proposed for Woodquay to be carried out in consultation with the public. The scheme will address parking and traffic management and as it states in section 10.2.5... *will include measures to enhance the strong community spirit such as community events and market days*..Chapter 4 also includes as a short term specific objective to progress the enhancement of Woodquay/Potato Market.

Opportunities for civic improvements will also be addressed in the proposed Public Realm Strategy as detailed in Chapter 8 which will include for defined goals and targets to enhance the management and use of public realm in the city. It is anticipated that this strategy will be prepared shortly after adoption of the plan.

With regard to Bowling Green, the request for urgency in the preparation of an improvement scheme for this area is noted. A specific timescale has not been set for the preparation of this scheme and its completion will be resource dependent. As requested by the submission, issues to be addressed in the improvement scheme will include amenity and traffic management. The proposed Improvement scheme for this area will also be informed by the Public Realm Strategy.

Other associated aspects that relate to the area are under the control of private landowners where permissions have been granted that would contribute to improvements but have not implemented to date.

With regard to Whitehall, a specific objective to *prepare an enhancement scheme for Whitehall* is included in Chapter 2 Section 2.12.

With regard to increased residential development in the city centre, the zoning objective for the city centre is... *to provide for city centre activities and particularly those, which preserve the city, centre as the dominant commercial area of the city.* .. Residential use is a use which is compatible with this objective. Residential development in the city centre is considered an essential element of a living and sustainable city. All new development in the city centre is required to have a minimum 20% residential content. In the regeneration areas of the city centre namely Ceannt Station and Inner Harbour a minimum 30% is required enabling new communities to develop on these brown field sites, ensuring an appropriate mix of uses and to create a vibrant neighbourhood.

With regard to specific reference to tourist accommodation, *section 10.2 Diversity of Uses* refers to a broad range of uses and includes *uses relating to tourism* and their contribution to the vitality and atmosphere of the city centre. It is not considered necessary to specifically refer to accommodation over any other tourism supporting facility in the city centre. This is consistent with the uses highlighted in the zoning objective for City Centre Section 11.2.7 which refers to *Tourist related uses*, as an example of a use which is compatible with the city centre zoning objective.

The request to extend the pedestrianised area and improve permeability and traffic management is noted. The development plan sets out a range of policies and objectives which seek to improve the pedestrian environment and permeability in the city centre as in Ch 3. Improvements will also be informed by the GTS and the proposal to prepare a Public Realm Strategy.

With regard to significant improvements required to Father Griffin Park, this is an operational issue for the Recreation and Amenity works programme. Reference is made to the need for better pavements and lighting in the area, the public realm study will be a comprehensive strategy for the management and enhancement of the public realm in the city centre.

With regard to lands fronting onto Eyre Square (known as Eyre Square East), it would not be appropriate to include in the development plan the specific vision as outlined in the details submitted, these details would be more appropriate as part of a planning application for a specific development proposal for the lands. It is considered that section 10.2.3 *Site Assembly and Key Opportunity Sites* best addresses the requirements for these lands. This section requires that large scale sites include an overall masterplan which demonstrates an integrated and holistic view of development which sets out the optimum development strategy taking into consideration issues of architecture, urban design, traffic management, car parking and the surrounding built and natural environment. Specific reference is made in this section to Eyre Square East and the need to take a comprehensive approach to masterplanning given the scale of the city centre site and its location partially within the Eyre Square ACA. This section therefore is recognising the potential for large scale re-development but to promote one solution would be too inflexible and could prejudice other future opportunity arrangements.

The development plan recognises the demand for FDI type office space in the city centre. This type of use is compatible with the CC zoning objective. Chapter 5, section 5.3 specifically refers to the attractiveness of central locations and references Eyre Square East together with Ceannt station, Inner Harbour, Nuns Island and Headford Road as locations which are ripe for regeneration and with potential to support emerging enterprise as well as a presence by larger established companies.

Harbour/The Docks/Ceannt Station:

With regard to development of Ceannt Station and Inner Harbour prior to the development of Ardaun, it is not possible to set timescales for potential development of these areas which will be plan led and market dependant. All three areas are part of the development/settlement strategy for the city. The two city centre sites will require masterplans and Ardaun requires a LAP to ensure the integrated sustainable development of these areas.

Sections 10.2.1 and 10.2.2 sets out a number of specific requirements for the two city centre regeneration sites including a requirement for masterplans which will set out the best options for regeneration, will provide for a range of uses including provision of social and cultural facilities and in the case of the inner harbour area, marine facilities. The preparation of masterplans will be guided by the requirements of the Development Plan and it is envisaged that consultation with the Council will be an important element of the process. However the responsibility for preparation of masterplans will be with the associated landowners/developers.

With regard to access and facilities at Claddagh Basin and the Docks, Chapter 4 and specifically Section 4.3.2 Coast, Canals and Waterways include policy to develop and enhance the recreation and amenity potential and accessibility of the city's waterways and coast. In the case of Claddagh Basin, this area is under the remit of the Lough Corrib Navigation Trust. No proposal for such developments has been received from this body. In any event such developments will most likely require planning permission and will be subject to assessment at that stage should a proposal be forthcoming.

With regard to the preservation of the docks and quay walls, these are a valuable part of the heritage of the city and designated as Protected Structures (ref: 8501). Chapter 8 highlights the importance of the built heritage to the city and specifically policy 8.2 relates to protection of this heritage.

The West:

Numerous submissions have been received with regard to the area known as The West. Submissions request improvements to be carried out to the public realm citing narrow footpaths, poor lighting the need for improved signage and street furniture. In this regard it is considered that these issues will be addressed in the proposed Public Realm Strategy as detailed in Chapter 8 which will include for defined goals and targets to enhance the management and use of public realm in the city. The proposed wayfinding strategy will inform the location and design of signage and mapboards in the area.

It is also proposed to amend section 10.2.5 Raven Terrace to widen this section to the West Area and insert a specific policy to enhance the urban environment of the West.

With regard to preservation of the area and enhancement of the character of the west, the plan recognises the importance of the built heritage in this area through designation of ACAs and through inclusion of structures on the RPS. There are two Architectural Conservation Areas – Dominick Street and Crescent/Sea road ACA detailed in Chapter 8. The designation of these areas recognises their heritage value and management plans for these ACAs will set out detailed guidance for future development and a co-ordinated approach to works in the public domain. There are also a number of proposed additions to the RPS in this area further highlighting the heritage value of the area.

With regard to expansion of new development, there are a number of sites in this area which have been granted planning permission for a range of uses. However they have not progressed possibly owing to recent economic challenges. This area is zoned for city centre uses which allows for a very

wide range of uses and policy in chapter 5 economic developments and chapter 6 retail strategy supports and promotes city centre development and regeneration. The SFRA has already highlighted part of this area as at Flood risk, any new development will be required to have regard to flood risk.

With regard to the Small Crane Square, Section 10.2.5 and 10.7 proposes a civic improvement scheme. These civic improvements may include pedestrianisation, undergrounding of services and provision of high quality public space and an enhanced setting for the Small Crane weighing scales, a protected structure. The scheme will also investigate potential to re-establish the market and to facilitate community events.

With regard to the transport network and traffic management in the area, improvements to transport in the city centre including the west area will arise through implementation of measures proposed in the Galway Transport Strategy (GTS). The GTS is a comprehensive strategy to address traffic problems in the city and its implementation will provide opportunities to improve accessibility and support environmental and public realm improvements. These measures combined with the proposed N6 GCRR will reduce traffic volumes in the city centre, including the West area and allow opportunities to improve connectivity to the West with subsequent improvements in footfall. The Public Realm Strategy will also inform opportunities for improvement. Additional text is recommended for inclusion in the Draft Plan and as referred to above will build on the improvements already carried out in Raven Terrace.

With regard to provision of additional car parking in the area, the measures proposed in the GTS for the city centre focus on improving and prioritising walking, cycling and public transport. In this regard it is not proposed to provide additional car parking in this area.

Ardaun:

Submissions referring to Ardaun are noted. The LAP will set out the best options for the sustainable development of these lands and it would be premature to designate areas for retail use or as opportunity sites pending completion of the LAP. Any future development of this area will accord with national guidelines. With regard to inclusion of the county area within the LAP, the county lands are outside of the control of the City Council and therefore it is not within our remit to include them in the LAP. The LAP will however, in accordance with policy 10.5, consider the strategic needs of the lands in the immediate County area to ensure co-ordination of key elements such as land use, infrastructure and sustainable transport.

Ardaun is at a highly accessible location and is a key element of the core strategy for the city enshrined in previous plans and at national and regional level. The LAP will include for a comprehensive movement strategy focussing on the development of a bus based public transport network and a comprehensive cycle and pedestrian network linking in with the GTS. The development of Ardaun is a critical element of the settlement strategy for the city, together with the consolidation of undeveloped zoned lands and regeneration of key brownfield sites - Ceannt Station, Harbour and Headford Road LAP area. It would not be appropriate to identify Ardaun as a long term future strategic land bank. It is envisaged that Ardaun will be developed on a phased basis and will continue to be developed beyond the next development plan period that is post 2023.

Murrough:

With regard to a Murrough LAP boundary extension to include the Ballyloughaun area to allow for future integrated recreation and amenity development, this is not considered appropriate and could affect the timescales for delivery of additional recreation facilities in the Ballyloughaun area. The current RA zoning in Ballyloughaun does not prohibit recreation development or future integration. A number of planning permissions have already been granted in the vicinity at Mellow's grounds

including pl. Ref. No. 08/381, pl. Ref. No. 09/97 and pl. Ref. No. 11/284 for a range of recreational facilities and infrastructure. No change is therefore proposed in the wording.

With regard to rail and public transport links from the city centre to Murrough, amendments to Chapter 3 incorporate the GTS which includes a comprehensive public transport strategy for the city. Chapter 3 also includes specific objectives to provide for possible commuter rail stops within the city and to reserve lands parallel with the rail line from the city centre to the eastern city boundary for future rail transport requirements. Murrough LAP will include for a range of recreation and amenity uses, it is not deemed appropriate to specifically refer to tourist uses, and the development of this area will be to cater for the recreation and amenity needs of all users.

With regard to the reference to recreation development of GMIT lands, it should be clarified that the subject planning application was not deemed premature. A decision to request Further Information was made in respect of this development and was not responded to by the applicant within the required timescale and therefore had to by law be deemed withdrawn by the planning authority (plref.08/752). This application was not followed up subsequently. The Draft Plan does not preclude sporting and recreation activities to occur in this area but subject to safe access and environmental considerations.

Other:

With regard to the Headford Road area and the minimum residential content required in the Draft Plan, this relates to new large scale developments and not minor alterations. Ancillary increases in floor space can be accommodated and a range of planning permissions have been granted e.g. Conker Properties, for extensions and alterations. No change in the wording is considered necessary.

With regard to transport improvements in Salthill, Amendments to Chapter 3 include measures included in the GTS which will improve accessibility to and within Salthill. It is proposed to make amendments in this section to include for reference to transport proposals and public realm improvements.

In relation to specific public consultation, statutory requirements are built in for consultation on draft statutory plans. In practice the City council also undertakes consultation on non statutory plans. Other masterplans prepared by the private sector do not have a statutory requirement for consultation. However, planning applications arising from such masterplans do allow for public consultation and also opportunities for observations/objections/ submissions.

Requirements of the statutory environmental assessments of the plan are part of the development plan process. Should the preparation of Health Impact Assessment become a statutory requirement, it will be carried out. It should be noted that SEA does take into account a range of issues which impact on health as referenced in previous sections of this report.

With regard to the request to strengthen and define different neighbourhoods in the city to aid navigation, Chapter 2 includes for definition of different neighbourhoods by their character and function. In terms of navigation, the proposed wayfinding strategy will provide a comprehensive approach to the provision of signage and map boards to aid navigation. A signage and branding strategy under preparation by the City Council will also help in defining neighbourhoods.

Recommendations:

Proposed amendments relating to this Chapter include Amendments No's:

- A10.1
- A 10.2
- A10.3
- A10.4
- A10.5
- A 10.6
- A10.7
- A10.8

Summary of Issues Raised

Specific Development Objective 11.2:

There are a total of 77 submissions, 8 for and 69 against, regarding the Specific Development Objective 11.2 location of secondary school on NUIG grounds/Dangan. Issues raised against the Specific Objective include;

- Would exacerbate traffic congestion on road network. Scale of site inadequate for all ancillary requirements and adequate provision for safe and convenient access cannot be achieved.
- Site size does not meet national Department of Education guidelines for school provision.
- Site size will be further impacted upon by presence of archaeological site.
- The area lacks facilities and services for student population.
- West of the city already well served by existing secondary schools.
- Concerns over impact of N6GCTP route on well being of students.
- Loss of amenity land, lands should be reserved for recreation and amenity.
- Considering age profile of the area does not justify a secondary school.
- Safety concerns for pedestrians crossing a busy road.
- Increase traffic would cause noise and air pollution.
- Lack of supporting facilities in the area.
- Scale of site inadequate for proposed number of students.
- Preserve the biodiversity of the area.
- Safety and anti-social behaviour concerns.

Issues raised in support of the Specific Objective include;

- Existing school no longer fit for purposes with overcrowding and out dated facilities.
- Would afford higher quality and healthier educational environment.
- Vast majority of students live on west side of river.
- School site is at an optimal location with access to adjacent sports facilities.
- Department of Education and Skills supports relocation of school to green field site and funding for new school has been approved.
- Galway lacks a secondary school in this area of the city.
- Lacks sport and recreation facilities in proximity of the school.
- Majority of students live on west side of river.
- Detail planning process will address all environmental, traffic, archaeology and visual issues.

Land Use Policy and Objectives:

R/LDR Zoned Lands:

- Increase residential densities of lands Fig. 11.13 Merlin Lane, Doughiska and 11.14 Doughiska .
- Amend Specific Development Objective in Chapter 11 Fig. 11.19 Ballindooley to replace wording “*shall be reserved for a cultural facility*” with “*shall be reserved for the provision of community, recreational, educational and heritage facilities and car parking related to these facilities*”. Enlarge the site outlined in black in Fig. 11.9 Ballindooley to include adjacent field (0.55ha/1.35acres).

- Amend Figure 11.26 LDR Coolagh (10.5ha) from 2.5 dwellings/ha (1house/acre) to allow a maximum density of 10 dwellings/Ha (4 houses/acre) to reflect the establish pattern of development in the area. Lands are readily serviced and the increased density would represent sustainable use of housing land.

CI Zoned Lands:

- Remove the Wellpark Retail and Leisure Park from the specific development objective which restricts retailing to bulky goods and local retailing needs only on CI zoned lands. Include a specific objective that will allow a wider range of retail opportunities at Wellpark Retail Park. Wellpark Retail Park is already a mixed use development and is located within the city with a significant adjacent residential population, a wider range of retail uses would reduce vacant floorspace in the Park ensure viability and success of the Retail Park.
- Seeking to alter the required residential content of former Topaz site from a minimum of 30% to a minimum of 10% of gross floor area as it dilutes the commercial potential of these sites and the revision will still allow for a residential content. Requests flexibility on requirement to provide 30% minimum residential content in the Headford Road area, where it would not represent the optimal use for a specific site. Requests redevelopment of Dyke Road car park and provision of multi storey car park to service the area. Requests that the Plan support measures to upgrade streetscape and improve connectivity between Headford Road and city centre and increase maximum plot ratio permissible to 2:1 in line with city centre.
- Amend Specific Development Objective 11.2.6 in relation to the former Crown site to remove the 20% cap on residential development and to promote a significant element of residential use on the site. 20% cap limits the viability of the site. Remove reference in Specific Objective 11.2.6 to access restriction to this site. Restrictions on site access compromises connectivity and permeability between the site and surrounding network. Remove reference to four storey building height restriction as there is capacity to accommodate higher buildings in less sensitive locations within the site. Restriction on the retail mix be relaxed to permit convenience retailing with low/middle order comparison goods as this would enhance the viability of the site for development.
- Amend wording of Section 10.2.4 and Section 11.9.4 with regard to the requirement a minimum content of 30% objective in area zoned CI adjoining the Headford Road. To state that this requirement would not apply in the case of alterations to or extension of commercial buildings. In order to provide clarity with regard to future development proposals.
- Remove Specific Development Objective 11.2.6 from Section 11 of the Plan requiring the provision of community centre at Joyce's Supermarket as this is now unnecessary. Community meeting rooms have been provided at first floor level at Joyces and this use will continue. The ground floor space is unsuitable for community use and has never been used as such. A new Knocknacarra Community Centre is of located at Cappagh Park. Considers that there is already able provision at the new Cappagh Park Facility.
- In Section 11.2.8 expand reference to hotels to include hostel. Insert specific objective to support in principle the provision of aparthotels, tourist hostels, cafes and restaurants and visitor attractions including those for children.
- Supports the retention of the CI zoning of ESB site at Sean Mulvoy Road (c.6.87acres).
- Delete requirement for a minimum of 20% residential/residential commercial floorspace as part of any new development in Knocknacarra District Centre (Gateway Retail Park) as it has potential to hinder appropriate development.
- Expand the range of uses permission in principle in CI zoning objective to include hotel, cinema, restaurant/cafe and drive-thru and expand the uses that may contribute to

dependent on location and scale to include other uses such as motor show room and petrol filling station.

- The designation of Westside as a district centre undermines the development of Knocknacarra District Centre.
- Consider hotels and hostels as uses that may contribute to the zoning objective dependent on scale that would not duly interfere primary use of the land for CI purposes in CI land use zones, Section 11.2.6.

CC Zoned Lands:

- Zone from CC to CI Market Street Car Park to reflect its current use as car park or alternatively to provide specific objective to facilitate a car park and food market on site. Site ideally suited for a market with car parking provision.
- Expand reference to tourist related uses to include reference in CC land use zoning objective to hotel and hostel accommodation in Section 11.2.7.

RA Zoned Lands:

- Amend Specific Development Objective in Chapter 11, Section 11.2.2 in relation to RA zoned lands north of Dublin Road and south of CF zoned lands at Merlin Park Hospital to allow for hospice on 6.2Ha/15.3 acres site. Any proposed development would retain the existing woodland setting and would retain public access. A hospice facility requires a site at this scale and would provide an appropriate setting for such facility. Permission has expired for an Alzheimer's unit on part of this site.
- Objects to the 11.2.2 removal of the RA zoning of the lands north of the Dublin Road and south of CF zoned lands, as it would result in the loss of high biodiversity land, woodland habitat and trees and loss of amenity lands for recreation. It is considered that there is adequate CF zoned land for development within the hospital complex and the site would be more appropriate as a garden for patients and community.

A/G Zoned Lands:

- Seeks the inclusion of specific development objective for commercial residential step down facility on lands at Doughiska.
- Consider hotels to be compatible in the A zoning especially in redundant buildings where appropriate, Section 11.2.3.

I zoned Lands:

- Consider hotels and hostels which may contribute to I land use zoning objective dependent on the location and scale, Section 11.2.5.

CF Zoned Lands:

- Amend Section 11.2.1 in relation to CF zoned lands at Fisheries Field to omit cultural facility and insert wording to consider the development of this site for uses not normally permitted on CF zoned lands where a beneficial public facility forms part of the development proposals.
- Review existing objective to facilitate hotel redevelopment (Section 11.2.2 Menlo Park Hotel) on lands adjacent to Kirwan roundabout to ensure any development proposals would not impact on the proposed upgrade of this roundabout.
- Add hotel and tourist accommodation to list of uses compatible with CF zoning objective, Section 11.2.1.

Development Standards and Guidelines:

General

- Reference to Section 28, Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2015 should be incorporated into the draft plan, particularly within chapter 2 Policy 2.2 Housing Strategy and in the Residential Densities text in Section 2.4; in chapter 11 Section 11.3 Residential Development regarding private open space standards and in Schedule 2, page 210.
- Include standard to exclude the use of plastic downpipes, doors and windows on front of buildings at ground floor level.
- Highlight the importance of Universal Design Homes.
- Amend Section 11.4.5 in relation uses within city centre as follows; in relation to High Street, consideration will be given to food outlet use in small existing ground floor units of total retail gross floor space of less than 50sq.m. This would enable viable uses of constrained protected structures and would contribute to vitality and vibrancy of the street and complement city centre uses.
- Consider in development standards an increase in the number of new fruit trees planted e.g. 2% and the planting of small orchards in established parks and community gardens.

Car Parking

- An evidence based approach to car parking is required through the preparation of an overall car parking strategy for the city. Development Plan should seek to manage rather than prohibit car parking. Suggests text revisions to support parking.
- Seeks the inclusion of new EV parking standards under Section 11.10.1 for development with private car spaces (residential and non-residential) including visitor car parking spaces eg. office space and for developments with publicly accessible spaces (eg. supermarket car park, cinema etc.), in view of the future growth of use of EVs and government's commitment to reducing greenhouse gases.
- Reduce the requirement for car parking associated with office development from 1 space per 50sq.m. to 1 space per 300sq.m. to promote more sustainable transport movements. The requirement for car parking militates the viability of commercial development in the city centre and leads to unsustainable traffic patterns. Reduce car parking requirement for all commercial development in city centre and encourage travel work place plans.

Signage

- Consider under Section 11.6 Advertisements and Signage support for the actions of Galway City Alcohol Strategy to Prevent and Reduce Alcohol-Related Harm e.g.
 - Reduce the exposure of children to alcohol marketing in public places
 - Restrict the total number of alcohol outlets and limit alcohol outlet density as part of overall plan to prevent and reduce alcohol related harm in Galway City
- Consider the effects of signage including alcohol signage and advertising having regard to its impact on health and wellbeing.

Response:

Response:

Specific Development Objective 11.2 to allow for consideration of secondary school on RA lands owned by NUIG:

This specific objective generated the most number of submissions during the consultation process with 8 submissions in support and 69 submissions objecting to the inclusion of the specific objective. The objectors question primarily the suitability of the location, site size, adequacy of facilities, loss of amenity lands and biodiversity. They also express serious concern with regard to traffic congestion, traffic safety and nuisance such as noise and anti social behaviour that may arise from the development of a secondary school at this location.

In response, it is considered that in principle this is a suitable location for a secondary school. The site is highly accessible and well served by essential infrastructure. Its location as part of the NUIG land bank gives potential for access to the significant NUIG RA bank of lands adjacent to the site and potential to link with the wide range of amenities associated with those lands such as direct river access. This site is an optimum location to deliver a high quality educational and working environment for students and staff in a safe and attractive setting conducive to learning. A four acre site is deemed an appropriate size for the development of a secondary school at this location, to accommodate buildings and associated facilities. There may be opportunities also to use existing NUIG facilities adjacent to the site, however this has not been confirmed.

It is acknowledged that a secondary school at this location would not just serve an immediate local need. Secondary school catchments by their nature and scale are much broader than local neighbourhoods. This is evidenced by the range and profile of students attending existing schools in the city, however it is contended by the supporters of this school site that the vast majority of potential students would live on the west side, of the river as deduced from existing patterns of patronage. Notwithstanding the extent of the catchment it should be recognised that students in the wider catchment are eligible for school bus transport and a significant portion of attendees would be likely to use this option thereby reducing the perceived vehicular impact on the adjacent road network. Concerns expressed with regard to the location of a school in a residential area are noted, however it is a policy to locate schools within residential areas in order to serve existing and future need which is considered reasonable and sustainable. Other post primary schools namely Coláiste Mhuirinne and Coláiste na Coiribe have been successfully located in residential areas of the city in recent years. There are numerous other schools located in residential areas including three primary schools in the vicinity of this site.

The issue of traffic congestion and traffic safety is acknowledged and in particular the references to loading on the network during drop off and pick up times. However the nature of the use means that any development of the site will most likely not be open all year round taking into consideration that the post primary school year consists of opening days of 167 days, less than half a year's activity.

However it is recommended in the interests of parties who made submission and in the interests of sustainability that an amendment to the Specific Objective is made that is, to require as part of any development proposal, a School Traffic Control Management Plan and a Mobility Management Plan. These plans are required to set targets for modal shift to sustainable modes and public transport for staff and students working at and attending school. Such plans also include for appropriate facilities to support these sustainable modes. Such a plan would be required to include transport measures specific to the school and generally include the appointment of a Travel Plan Co-ordinator to

implement the plans and liaise with the City Council and stakeholders. Regular monitoring and review during term time of the achievement of targets and associated timelines would be required to deliver defined transport modal splits.

In general traffic congestion is a problem for the whole city and not specifically this area. In this regard the objective should be considered in the context of the proposals for a new transport strategy for the city. In addition to addressing road and traffic management issues it will be important to implement the proposals set out in the Galway Transportation Strategy in relation to cycle, pedestrian and public transport measures which will enhance accessibility and reduce traffic congestion in the city and have positive consequences for the Newcastle area and an appropriate level of public transport services and improved cycling and walking infrastructure.

The development management process will assess the suitability of the site relative to the scale of any proposed school and accommodation of ancillary facilities. Concerns with regard to impact on archaeology, noise and nuisance issues and visual impact are more appropriately dealt with as part of a planning application where detailed aspects of design and layout and potential impacts are normally assessed. This is also where additional opportunity will exist for third parties to view and comment also and exercise their right of appeal if needed.

Concerns have been expressed with regard to the loss of amenity lands at this location. It should be noted that these are lands privately owned by NUI Galway. The use of 1.6 hectares of these lands – out of a bank of almost 37 hectares - for a facility which would be of significant benefit to the school going population of the city at a location proximate to adjacent sports and amenity facilities is considered to outweigh the reduction of NUI Galway amenity land. It would be of a similar function – educational to what already exists already on the greater site. As part of any planning application, development proposals will be required to incorporate a high standard of design and landscaping to ensure integration with the surrounding natural setting, enhance biodiversity and minimise the visual impact of any development.

The issues raised in support of the Specific Objective are noted and concurred with. Reference to the existing St Josephs School is also noted. With regard to alternative school locations, the Specific Objective 11.2 would not prohibit an alternative location of St. Mary's College referenced in a number of submissions.

Land Use Policy and Objectives:

Change of Land Use Zoning from LDR to R at Doughiska:

It is proposed to rezone two pockets of land at Doughiska from LDR to R. These sites have significant merits over other lands for rezoning. They are a logical expansion of Doughiska. The lands are serviced and have a legacy of a high standard of roads, footpaths and public transport. They are close to essential community amenities such as schools, community centre, shops, church and can be accessed on foot/cycle. The lands meet the sequential approach being adjacent to existing R zoned lands to the north. An R zoning would reflect the urban form and density of the existing residential development to the north.

The third portion of land in the area being located directly onto the Dublin Road and the main approach to the city is not considered as suitable for high density and should remain LDR which allows for development but gives a transition zone into Doughiska, giving it better definition as a neighbourhood and minimises the visual impact on the access into the city.

Specific Development Objective – Figure 11.19 Ballindooley:

It is proposed to amend Specific Development Objective in Chapter 11 Fig. 11.19 in relation to the Council owned site in Ballindooley to replace wording “*shall be reserved for a cultural facility*” with “*shall be reserved for the provision of community, recreational, educational and heritage facilities and car parking related to these facilities*”. This is in response to a submission from a local community group who considered the objective to be too narrow in its focus.

This submission also requested an enlargement of the site to include the adjoining field, however a change is not recommended. The reservation of a site for such purposes was originally focused on the site for regeneration of the existing dwelling house and old cottage exclusively. The requirement for additional land for facilities at this location is not considered appropriate in particular given the completion of the Castlegar/Ballinfoile community centre - a significant community facility located nearby. Also in consideration that no new use has been established and there is no evidence to justify an extension of the lands to encompass an even greater site than what remains unused to date.

Specific Development Objective – Figure 11.26 LDR Coolagh:

A change in the density of these LDR lands from 2.5 houses/hectare to 10 houses/hectare would be wholly contrary to the principles of proper planning and sustainable development, in particular as the site lacks essential infrastructure. There is no proposal to extend the public services in this direction included for by Irish Water therefore the density would represent an environmental challenge in close proximity to a cSAC and within a limestone area with associated vulnerable pathways.

The established pattern of development would not, as contended in the submission, be reflected in the density increase sought. The lands are very elevated and exposed and are bounded by the Lackagh Quarry site to the south and in an area more rural than urban in character. There are infinitely more suitable lands which are sustainably serviced and available to meet the housing requirements for this plan period. No change is recommended to the Draft Plan.

CI Zoned Land- Retail type and extent:

A number of the submissions seek to be reclassified within the retail hierarchy of the city and expand the type of retailing on CI lands, for example the Wellpark Retail Park and former Crown site. These submissions, relating to various locations throughout the city, are haphazard locations and without any definite pattern and would be contrary to the retail hierarchy which directs such development to District, Neighbourhood or Local Centres. To allow an expansion of the range of retailing at these locations would undermine the primacy and economic commercial function of the city centre as the core retail shopping area and would be wholly unsustainable. There is ample evidence in other urban areas to demonstrate the damage retail development on the periphery can have on city centres. As such, no change is recommended to the Draft Plan.

CI/CC Zoned Land- Residential content:

It is not recommended to remove the minimum residential requirement in the city centre including the Inner Harbour/Ceannt Station sites, Headford Road LAP area and district centres, including Knocknacarra District Centre, as this requirement is needed to have an appropriate sustainable mix of uses and to create vibrant and safe neighbourhoods with sustainable communities and a living city. This minimum residential requirement will provide vital additional housing for the city at highly sustainable, accessible and attractive city centre locations. It is considered that as part of the successful regeneration of these areas, a significant level of residential presence is necessary and a residential content on the site equivalent to 30% of the gross floor area would give a critical mass to create a new community. Similar requirements were included for in the Urban renewal schemes

which radically changed the resident population in the city centre, a significant benefit from an economic, environmental, safety and urban design viewpoint.

CI Zoned Land- Former Crown Equipment Site:

In recognition of the needs to provide housing in the city at sustainable and serviced locations, an amendment to the Draft Plan is recommended to remove the 20% cap on residential development on the former Crown site and to remove the building height restrictions on the site. In response to the submission, and in consultation with the GTU, it is also considered appropriate to remove the access restrictions to this site, this would allow for greater opportunities for permeability and connections into the existing network. Any revisions to the permitted access and circulation network would be the subject of a planning application which would require detailed assessment in terms of impact on the network and implementation of proposed measures set out in the GTS. Similarly any revisions to permitted uses and heights would require planning permission and detailed assessment of the impact and positive contribution a development can make to the streetscape and the sustainable use of this large brownfield site.

To allow for an expansion of retailing at this location would however be contrary to the Retail Strategy. The site has the benefit of planning permission (Pl.Ref: 06/223 extended to September 2017) for a significant mixed use development of primarily bulky goods retail, offices, residential, leisure and hotel with some small scale retail for local need. To expand the potential for more diversity of uses for both convenient and comparison (other than bulky goods as permitted) would impact negatively on the balance of other centres and most importantly on the role of the city centre and the vision for the regeneration site therein.

CI Zoned Land- Joyces Supermarket site:

An amendment is recommended to remove the Specific Objective for the provision of a community centre on this site, noting the provision of a community centre in Cappagh Park which serves this area. However, having regard to the importance and usage of the existing community rooms within the Joyce development for the local community, these are required to continue to be facilitated at this location. A proposed amendment to the Draft Plan Chapter 11 Section 11.2.6 is therefore recommended *.to continue to facilitate community meeting rooms at first floor level at Joyces Supermarket development.*

CC Zoned Lands- Market Street Car Park site:

It is not considered appropriate to change the land use zoning of the Market Street Car Park from CC use to CI use. A CI zoning of this site would be contrary to the Core Strategy, inappropriate and unsustainable as it would not represent the optimum use and capacity of the site. This is considered to be a key redevelopment site within the city centre area and such a change would be contrary to Retail Strategy and the retail hierarchy as detailed in Chapter 6. There is a demand for larger retail floor space formats that could occupy this site and this significant site is one of only two potential large infill sites within the City Core ripe for regeneration (the other being the site known as Taaffe's). Development for city centre uses which has the maximum plot ratio is the optimum development option for this site.

Further development of this site as a multi storey car park would be in conflict with the objectives of the GTS which seek to reduce car parking provision in the city centre and to enhance the attraction of public transport and sustainable travel. It is not one of the designated car park sites – Ceannt Station and Headford Road in the Draft Plan and would therefore be considered surplus to the needs of the city. To allow for this site to develop as a permanent extended car park would also exacerbate congestion along the access which consists of a narrow network of streets and compromise any long term opportunities for expansion of the city pedestrianisation in this area.

It has always been considered that the existing surface car park is a temporary use pending the development of the site for a use which would provide for city centre services and result in a built form that would enhance the quality of the streetscape which is part of the City Core Architectural Conservation Area and proximate to the landmark St. Nicholas Church and Bowling Green. The site has the benefit of planning permission (Pl.Ref: 08/613 extended to June 2019) for a significant mixed retail, office and residential development consisting of two, four and two storey blocks. It also includes for a new pedestrian street and civic square. It includes also for the protection and enhancement of existing protected structures and Medieval wall which are reflected in the overall design. This permission gives an indication of the capacity of the site to contribute to the vitality and buoyancy of the city centre, protect the heritage of the city and enhance the quality of the streetscape at this location. To instead reserve the site for a multi storey car park would be contrary to the vision for the city centre and detrimental for the city centre therefore no change is recommended.

RA Zoned Lands- Merlin Park Hospital lands:

Specific development objective Section 11.2.2 which relates to the use of RA lands at Merlin Park Hospital is referenced in two separate submissions. One received from *Galway Hospice Foundation* and another from *The Friends of Merlin Park Woods*.

Currently in the Draft Plan, and a legacy from the 2011 City Development Plan there is specific development objective that allows for the consideration of the *“use of the lands occupied by the existing dwelling and a small portion of adjoining lands for an elderly care facility where removal of trees will be kept to a minimum”*. This is on RA zoned lands on the grounds of Merlin Park Hospital fronting on to the Dublin Road and almost opposite Galway Crystal. Consequent on the insertion of this objective, planning permission issued for the construction of a residential and day care nursing unit with ancillary buildings and car parking, for persons suffering from Alzheimer's disease ref. no. 07/874. The area of this site was 0.8ha/2acres and replaced the footprint of an existing derelict house and had the advantage of tree screening and a remove from the public road.

The current proposal requests that the building area be increased to 3.6 ha to facilitate a 26 bed hospice facility, all associated buildings, access and car parking. The balance of the lands stated to be made available to the foundation is 2.6ha and would be included in the site but remain as RA in use as an associated landscaped area and as stated support future use.

The existing objective allows for a level of development that can be assimilated without changing the character of this area and the attractive approach into the city. It ensured a limited build impact and was drafted so that it replaced the location of a derelict structure and nestled in a wooded setting at a remove from the public road. The current proposal in contrast would increase the building footprint substantially occupy the central meadow area and inevitably change the character of this very large bank of 6.2 ha notwithstanding the reference to retaining sections of woodland.

The nature of hospice use is recognised as providing a critical facility to the community of both Galway City and the wider county catchment. The challenges of future demand owing to demographic changes, and the expansion of palliative care to a broader range of persons with life limiting illnesses and the advantages of a service that includes for a homecare team is also acknowledged. These elements, although of an extremely sensitive and important nature are not the primary consideration from a land use viewpoint.

The RA lands have been retained for a specific purpose as part of the amenity lands in the city, allied to and including an attractive woodland setting, of high environmental, visual and biodiversity value that frames the approach to the city. Change in the zoning of these lands to development use has

been resisted over a series of development plans and there is no necessary reason now to alter this approach. In addition there has been very little precedent where change from RA zoning has been allowed in the past. There is significant CF zoned lands in the vicinity which can accommodate such a use. In addition there are many other land use zoning that could equally support a use of this nature. In view of this and in the context of the very extensive size of the site involved, it is not recommended to alter the zoning.

The second submission from the *Friends of Merlin Park Wood* notes that the lands are part of a local biodiversity area and wildlife corridor and an important entry point into the city. The submission also makes note of the availability of undeveloped CF zoned lands within the hospital grounds that could accommodate a hospice of the size proposed.

RA Zoned Land- Menlo Park Hotel:

In relation to lands at Menlo Park Hotel adjacent to the Kirwan Roundabout, a specific development objective Section 11.2.2 RA lands allows for consideration of underground hotel facilities. A submission received raised an issue with regard to the potential impact of this objective on any junction upgrade proposals. Having consulted with the Transportation section it has been established that lands at Menlo Park Hotel are surplus to any proposed junction revision requirements and no amendment to this specific objective is therefore required.

A/G Zoned Land- Specific Objective for step down facility at Doughiska:

The inclusion of a specific objective for a commercial step down facility at Doughiska is not recommended. Section 11.2.3 already includes for a specific objective for a step -down facility on adjacent lands that are linked to services provided at the Galway Clinic. This objective has not been activated through a specific planning application yet which gives no justification for an additional objective on the proposed lands. The inclusion of an additional specific objective on the additional site would be inappropriate. The site is not serviced and would be an unsustainable use of this land. Such a commercial development of this nature may have a detrimental impact on the residential, visual amenities and ecological value of agricultural lands. Ultimately these types of uses will be among the range of uses which will be considered in a planned and co-ordinated way as part of the LAP for the Ardaun lands to the north of the site. To allow for a change now would be piecemeal and unsustainable.

CF Zoned Lands- Fisheries Field:

The current wording of this specific objective allows for consideration of part of these lands for residential or commercial residential development where a significant cultural facility is proposed as part of the development and subject to detailed planning consideration such as design, access environmental suitability and traffic safety. This is considered a reasonable objective to achieve the balanced and sustainable development of the site.

This is a significant landmark site adjoining the city centre. It is a highly attractive site located in a semi natural setting bounded by the river and canal system, with extensive frontage onto the River Corrib and includes a lime kiln, a protected structure. Fisheries Field has a legacy of public use, with public access via the existing greenway and in recent years has become an important location for events, most notably during the Arts Festival. This site is a strategic site at a key location between the city centre and the university and is linked to the main NUIG campus via the new O' Shaughnessy Bridge.

Given the advantages of this site, it is considered that Fisheries Field could have significant civic value and should be reserved in part for this purpose. It is not considered appropriate to omit the requirement for a cultural facility and to allow for consideration of uses where a beneficial public facility forms part of the development proposals as requested in the submission. The wording is considered too limited to ensure a facility of significant community benefit can be secured. This site has potential for the development of an iconic cultural facility for the city. The wording inherent in

the existing objective envisages a development of exceptional architectural merit integrated into the surrounding environmental context and incorporating public access. No amendment is recommended to the existing objective. It should be noted that a conference centre and concert hall for the Fisheries Field was the subject of an application for Gateway Innovation Funding in 2007. This was in recognition of the potential this site has for a statement building that could showcase the city

Tourist accommodation –Hotels and Hostels

‘Tourist related uses’, which includes tourism accommodation such as hotels and hostels, are open for consideration under a number of land use zoning objectives, including R, CC and CI land use zones. Hotels and hostels are open for consideration under a number of other land use zoning objectives, including R, CC and CI land use zones.

It is recommended that Section 11.2.8 Residential R and LDR Land Use Zoning Objectives reference hostels in addition to hotels as a use that may contribute to the zoning objective dependent on the R and LDR location and scale of development.

The inclusion of hotels and hostels in I and CF zones would conflict with the land use zoning objectives of those zones.

Uses specified under various land use zoning objectives are intended as a guideline and are not exhaustive. Uses not cited as examples but which fulfil the land use objective are considered in relation to general policy and to the zoning objectives for the area in question. In addition it is noted that Section 8.2 Built Heritage of the Draft Plan provides that a change of use of a protected structure to a use compatible with the conservation of the structure, notwithstanding the zoning of the area, can be considered, examples of this include the conversion of former large estate houses or institutional buildings to tourism related uses and accommodation within agricultural areas.

Development Standards and Guidelines:

General

- Reference is made to new Section 28 Ministerial Guidelines; *Sustainable Urban Housing Design Standards for New Apartments, (DECLG 2015)* in recommended amendments. The use of modern building materials is an operational issue for development management. It is noted that Section 11.15 Built Heritage stated that in protected structures the replacement of windows with those of a different material e.g. aluminium and uPVC is not normally acceptable.
- Universal Design is addressed in Chapter 2, Housing and Sustainable Neighbourhoods (Section 2.5), Chapter 7 Community and Culture, Section 11.10 Transportation and Section 11.24 Access for All.
- No amendment to Section 11.4 City Centre Area, sub section 11.4.5 Uses is proposed. This section preserves the principle retail streets within the city centre, and any amendment would be contrary to the Retail Strategy, Chapter 5 and the retail hierarchy which places the city centre as Level 1 Main Town Centre. The Draft Plan does give consideration for retail services for exceptionally small existing units of total retail gross floor spaces of less than 20sq.m and retail service uses are allowable on upper floors.
- The planting of fruit trees while essentially an operational issue for the Parks & Amenity Section of the Council is already addressed in Section 4.7 Specific Objectives; Green Spaces short term specific objectives (pg. 69).

Car Parking

- Section 11.3 Residential Development and Section 11.10 Transportation Table 11.5 of the Draft Plan set out the car parking requirements for specific uses at different neighbourhoods/areas within the city. The GTS will address the management of car parking and parking space provision within the city in an evidence based manner based on smarter, sustainable and integrated transport and land use and mobility principles.
- Section 11.10.1 seeks the provision of EV car parking spaces in commercial developments. There is flexibility allowed in the application of car parking standards in the city centre and Salthill. Section 11.10.1 Parking Space Requirement states that in the city centre and Salthill, where developments do not provide car parking, a transportation contribution may be levied in lieu of on-site parking spaces. Chapter 3 Transportation and GTS includes for the encouragement of travel workplace mobility plans and initiatives and incentives to encourage modal shift from private car to other sustainable transport modes, thereby reducing car parking demand and this is included in an amendment to Section 11.10 - Transportation new sub-section 11.10.1 Mobility Travel Plans, see Part 3 of the Chief Executive's Report.

Signage

- While the control of alcohol is outside the remit of the Development Plan, it is the policy of the Draft Plan, as expressed under Signage 11.5 Shopfronts, and Section 11.6 Advertisements, to ensure that new signage or advertisements respect the scale, character and setting of the building to which it is attached and have regard to the extent of existing signage on the site. The policies under Sections 11.5 and 11.6 seek to limit the over-proliferation of commercial product advertising within the public realm and streetscape and preserve the attractiveness, visual amenities and heritage value of the city.
- The principle of limiting product/alcoholic drinks advertising is also included for in the Section 254 Outdoor Tables and Chairs policy document.
- Chapter 11, Section 11.4.5 Uses and Section 11.4.6 City Centre/Other Areas prevents the over concentration and enlargement of off-licenses in the city.

Recommendations:

Proposed amendments relating to this Chapter include Amendments No's:

- A11.1 to A11.25

Environmental Appraisals

SEA:

Strategic Environmental Assessment (SEA) is the formal evaluation of the likely significant environmental effects of implementing the development plan before a decision is made to adopt the plan. The Environmental Report detailing the SEA process accompanies the Development Plan and includes Strategic Environmental Objectives (SEO) against which the environmental effects of implementing the Plan are assessed and tested, these are based on a current understanding of key environmental issues. The SEA Report also includes an evaluation of the likely environmental impacts of alternative development strategies and describes measures for monitoring significant environment effects of implementing the Plan. This report is divided into these two sections:

1. SEA Screening Findings
2. Summary of Issues on SEA Environmental Report and Recommended Amendments

1 SEA Screening Findings

The DEHLG's *Guidelines for Regional and Planning Authorities on the Assessment of the Effects of Certain Plans and Programmes on the Environment, (2004)*, recommends that changes to the Draft Plan be screened to see if the proposed changes cause any significant environmental effects not previously identified in the Environmental Report, taking into account criteria set out in Schedule 2A of the SEA Regulations. The SEO against which the potential environmental effects of implementing the Plan are assessed are also considered in the screening assessment. SEO's are identified in Chapter 5 of the SEA Environmental Report and relate to the indicators described in the SEA Directive. The SEA screening assessment was also informed by the screening for Appropriate Assessment of recommended amendments¹ and the *SEA Screening of Recommended Amendments related to the Draft Galway Transport Strategy, May 2016*.

Table 1 provides a summary of the screening findings of amendments to strategy, policies and objectives. The assessment demonstrates that a SEA is required for recommended amendments relating to recreational development proposals and the GTS and NGGCRR, strategic projects for the city. Notwithstanding the protective policies of the Draft Plan, these recommended amendments have the potential for likely significant impacts on all SEA indicators: population and human health, biodiversity, flora and fauna, soil, water, air and climatic factors, material assets, cultural heritage

¹ DEHLG; Circular Letter SEA 1/08 & NPWS 1/08 *Appropriate Assessment of Land Use Plans clarifies that in any case where, following screening, it is found that the draft plan or amendment may have an impact on the conservation objectives of a Natura 2000 site or that such an impact cannot be ruled out, adopting a precautionary approach - an appropriate assessment of the plan must be carried out and in any case where a strategic environmental assessment (SEA) would not otherwise be required, it must also be carried out.*

and landscape and their interaction as well as for the SEOs set out in the Environmental Report for the Draft Plan. Planning legislation allows for additional time to facilitate this SEA on recommended amendments. It is recommended that an addendum to the SEA report be prepared on amendments that require SEA. It is also recommended that this addendum incorporates recommended amendments to the SEA made in response to submissions.

Table 1 Summary of SEA Screening Findings

Chapter	Amendment	Relates to	SEA Screening Summary
Recommended amendments to strategy/policy/objectives			
1 Introduction and Core Strategy	A1.1	Section 1.3 Core Strategy	Screened in
2 Housing and Sustainable Neighbourhoods	A2.2	Policy 2.2. Housing Strategy	Screened out
	A2.4	Policy 2.5 Outer Suburbs	Screened in
	A2.5	2.12 Specific Objectives	Screened out
3 Transportation	A3.1	Revised Transportation Chapter	Screened in
4 Natural Heritage, Recreation & Amenity	A4.3	Policy 4.5.1 Greenways and Public Rights of Way	Screened in
	A4.4	Policy 4.5.1 Greenways and Public Rights of Way	Screened in
	A4.5	Policy 4.5.1 Greenways and Public Rights of Way	Screened in
	A4.6	4.7 Green Network Specific Objectives	Screened in
	A4.7	Policy 4.1 Green Network	Screened in
5 Economic Activities	A5.2	Strategy	Screened in
	A5.3	Policy 5.1 Enterprise	Screened in
	A5.4	Policy 5.1 Enterprise	Screened in
6 Retail Strategy	A6.1	Strategy	Screened in
7 Community & Culture	A7.1	Policy 7.4.1 Community Facilities	Screened in
	A7.2	7.5. Specific Objective	Screened out
	A7.4	7.5. Specific Objectives	Screened out
8 Built Heritage and Urban Design	A8.3	Policy 8.7 Urban Design	Screened in
9 Environment & Infrastructure	A9.1	Policy 9.2 Climate Change Resilience	Screened out
	A9.2	9.15 Specific Objectives	Screened out
	A9.4	Policy 9.14 Energy and Associated Infrastructure	Screened out
10 City Centre/Area Based Plans	A10.5	Policy 10.2.5 Other City Centre Areas	Screened out
	A10.7	Policy 10.2 City Centre	Screened in
	A10.8	Policy 10.3 Salthill	Screened in

The SEA Screening of Recommended Amendments related to the Draft Galway Transport Strategy, May 2016 informed SEA screening findings

2 Summary of Issues on SEA Environmental Report and Response

The following includes a summary of issues raised on the SEA Environmental Report along with the CE response. An addendum to the SEA report is to be prepared on amendments that require SEA. It is recommended that this addendum incorporates recommended amendments to the SEA made in response to submissions and highlighted below:

Ref. No.	Summary of Issues raised	Response and Recommendation
General		
DDP.17.057	The planning authority should satisfy themselves in consultation with the National Parks and Wildlife Service that the draft plan is fully compliant with its obligations under the relevant Strategic Environmental Assessment (SEA) and Habitats Directive Assessment (AA) Directives.	Noted. Refer to SEA Screening Findings
DDP.17.081	Ensure that the delivery of transport infrastructure complies fully with SEA and EIA Directives.	
DDP.17.218	Welcomes incorporation of many issues made at pre-draft stage in the preparation of Plan and associated SEA ER.	Positive comments regarding the Plan and associated SEA ER noted.
Additional comments to be considered are as follows:		
DDP.17.218	<p><i>Amend Table 3.1 Key Plans associated with the Development Plan and SEA Process to include a reference to</i></p> <ul style="list-style-type: none"> - National Mitigation Plan (DECLG currently being prepared) - Renewable Electricity Policy and Development Framework (DCENR – recently commenced) - Galway County Development Plan - Wild Atlantic Way (Failte Ireland) 	Plans and guidelines associated with the Development Plan and SEA process are identified in Table 3.1 and Appendix 3 of the SEA Environmental Report: key plans are identified in Table 3.1. The National Mitigation Plan, currently being prepared by the DECLG, relates to enactment of the Climate Action and Low Carbon Development Bill 2015. The Renewable Electricity Policy and Development Framework, recently commenced by DCENR, aims to guide the development of renewable electricity projects in a sustainable manner. Documents listed in Appendix 3 included the County Development Plan.

Ref. No.	Summary of Issues raised	Response and Recommendation
		Recommended Amendment: Amend Table 3.1 Key Plans associated with the Development Plan and SEA Process to include publications.
DDP.17.218	Welcomes the detail provided in highlighting the existing green (and blue) infrastructure network within the Plan area, highlighting the significant environmental resource and ecosystem services aspects to both protect, manage and develop in an environmentally sustainable manner.	Positive comments with regard to Chapter 4 are noted.
DDP.17.218	Notes the alternatives proposed in SEA and the selection of the preferred alternative.	Noted.
DDP.17.123:	As part of alternative options in the SEA, the Council should consider whether an option of new development could be more sustainably directed towards areas already serviced which may be a more informative alternative to be considered in preference to that described in Scenario 1 Chapter 6 of the SEA.	Three spatial alternative plan/strategic development scenarios were considered in Chapter 6 of the SEA Environmental Report and informed the core strategy of the Development Plan. It is not considered appropriate to have a scenario to direct city population to the county area. Population targets set by the department were specific to the city, similarly targets were specifically set for the county. National, regional and local policy promotes the development of a critical mass in the city to sustain critical services and enhance the role of the city as a regional capital and gateway.
DDP.17.218	Acknowledges the mitigation measures proposed in Table 8.1 Mitigation Measures of Draft Galway City Development Plan 2017-2023	Noted.
DDP.17.218	Consider including additional mitigation policy under the 'Housing' sub-heading to avoid inappropriate residential / mixed use development in areas of potential significant flood risk or coastal erosion. This should be informed by the Flood Risk Assessment carried out as well as the relevant aspects of the Western CFRAMS upon its adoption.	This is included for in Chapter 9 of the Draft Plan, SFRA and SEA.
DDP.17.218	Where possible, information relating to the monitoring frequency for the relevant environmental protection objectives should be included	A monitoring programme is included for in the SEA report and its delivery is an operational matter. Chapter

Ref. No.	Summary of Issues raised	Response and Recommendation
		<p>9 of the SEA report states that the frequency of monitoring process shall be carried out on an ongoing basis through the assessment of planning applications and environmental monitoring programmes. Indicators are indicative and may change over the period of the Plan, taking into consideration factors such as changes to monitoring programmes over time and monitoring arrangements of other stakeholders. The SEA monitoring process will be integrated with the normal review of the Development Plan. A preliminary report on SEA monitoring shall be prepared to coincide with the Chief Executive's Report to Elected Members on progress achieved in securing Development Plan objectives and targets, within two years of the making of the Plan.</p>
DDP.17.218	<p>Monitoring measures relating to any changes in water quality status (and any associated trend information) should also be considered and reported where possible. The EPA's online WFD Application (available on EDEN) could assist in these water related monitoring aspects.</p>	<p>A monitoring programme is included for in the SEA report and its delivery is an operational matter. Monitoring measures to assist in monitoring changes in water quality status are noted.</p>
DDP.17.218	<p>Where amendments to the Plan are proposed, these should be screened for likely significant effects in accordance with the criteria as set out in Schedule 2A of the SEA Regulations and should be subject to the same method of assessment applied in the 'environmental assessment' of Draft Plan.</p>	<p>Screening is part of the material amendment process, see section 1 of this report.</p>
DDP.17.218	<p>Following adoption of the Plan, an SEA Statement should be sent to any environmental authority consulted during the SEA process summarising the following:</p> <ul style="list-style-type: none"> - How environmental considerations have been integrated into the Plan 	<p>This stage of the SEA process will be adhered to.</p>

Ref. No.	Summary of Issues raised	Response and Recommendation
	<ul style="list-style-type: none"> - How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan - Reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and - Measures decided upon to monitor the significant environmental effects of implementation of the Plan. 	
DDP.17.117	<p>SEA assessment of policies and objectives should generally mirror the NIR, suggests assessment does not match the NIR and DAHGs own knowledge of some critical concerns in the plan area. The matrix requires further assessment and analysis to reach more robust and precise conclusions, and so that the findings of the SEA can reflect or integrate more appropriately with those of the NIR and the appropriate assessment which has yet to be carried out.</p>	<p>The SEA and the NIR differ in their focus. SEA reviews the combined influence/effect of a policy or objective over a range of environmental indicators including biodiversity flora and fauna. Whereas the NIR considers only the effects of a given plan or project on a European site. The NIR of the Draft Development Plan identified potential impacts of proposed policies and objectives whereas the SEA listed them as unknown potential impacts that would depend on the proposal at development stage. The SEA report also highlighted that uncertain potential impacts relating to the development of large greenfield sites at Ardaun and Murrough, redevelopment proposals within the city, transportation and green network proposals, coastal protection and flood mitigation measures, which is consistent with the NIR. Both the SEA and NIR assessments highlighted that mitigation and monitoring would be required to ensure no deterioration in environmental quality.</p> <p>Additional mitigation measures recommended by the NIR are included for in the mitigation measures set out in Table 8.1 of the SEA report and informed the</p>

Ref. No.	Summary of Issues raised	Response and Recommendation
		<p>Development Plan review. Amendments to the SEA assessment of policies and objectives will be carried out following a review of the updated NIR of the Plan.</p> <p>Recommended Amendment: Update Table 7.1 Evaluation of Policies and objectives, Table 8.1 Mitigation Measures and Table 9.1: Monitoring Measures to take into account any amendments to policies and objectives and recommendations of the updated NIR.</p>
DDP.17.117	<p>Habitat and species datasets associated with the N6 GCTP in particular, but also the former N6 GCOB, and the Galway City Habitat Inventory (2005) are available in GIS format. There is no clear indication that any of these have been used in informing the plan and its environmental assessments.</p> <p>Losses of Annex I habitats outside nature conservation sites have occurred in the plan area as a result of development and agricultural reclamation since the dates for the implementation of the EIA Directive, Habitats and Birds Directives, and Environmental Liability Directive in Ireland. Further losses through land use zonings and arising from projects supported or promoted by the plan should be given due consideration in the SEA, including in the context of whether ‘environmental damage’ as defined in the Environmental Liability Directive could be caused.</p>	<p>Section 4.2 of the SEA Environmental Report includes baseline data on biodiversity, flora and fauna, which was collated through a review of currently available data as recommended in SEA Guidelines. This section includes maps and tables of designated sites of International Importance and national sites of importance. It also includes Table 4.3 Network of Local Biodiversity Areas included in City Development Plan and Table 4.4: Other Areas of Local Importance in the City included in City Development Plan, these were informed by habitat mapping of the Galway City Habitat Inventory (2005). Details on the Galway Biodiversity Action Plan (GBAP 2014-2024) which takes into consideration the findings of the inventory are also provided along with a summary of the threats for various habitat sub-groups identified in the habitat inventory. The SEA Report also highlights that the GBAP</p>

Ref. No.	Summary of Issues raised	Response and Recommendation
		<p>2014-2024 sets out a action to resurvey the Local Biodiversity Areas identified in the Habitats Inventory and potential wildlife corridors and to list them in the City Development Plan. This should in turn be informed by habitat and species datasets associated with the N6 GCTP.</p> <p>Baseline data also provides details on the NIR of Draft Galway City Development Plan 2017-2023, which includes details of annexed habitats and species outside European sites recorded in the plan area as part of the N6 GCTP Route Selection Report (ARUP 2015). For the purpose of clarity, it is proposed to include a map of annex 1 habitats in the Galway area, based on draft data for habitat and species datasets associated with the project and to highlight protection afforded to annex 1 habitats under planning and wildlife/habitat legislation. The key issues identified in the SEA Report included to incorporate recommendations from the NIR and ensure that plans and development proposals with potential to impact on European sites, protected flora and fauna are subject to ecological assessment. This informed zoning reviews and Development Plan policy to protect habitats outside of the Natura 2000 network. Policy 4.2 includes to 'Protect and conserve rare and threatened flora and fauna and their key habitats, (wherever they occur) listed on Annex I and Annex IV of the EU Habitats Directive (92/43EEC) and listed for</p>

Ref. No.	Summary of Issues raised	Response and Recommendation
		<p>protection under the Wildlife Acts 1976-2000.</p> <p>Recommended Amendment: Amend baseline data on biodiversity, flora and fauna to include map of annex 1 habitats in the Galway area based on draft data for habitat and species datasets associated with the N6 GCTP and to highlight protection afforded to annex 1 habitats under planning and wildlife/habitat legislation.</p>



Annex 1 Habitats in the Galway area. Source: Draft data for habitat and species datasets associated with the N6GCRR

NIR:

The Natura Impact Report (NIR) is an assessment of the Draft Galway City Development Plan 2017-2023, based on best scientific knowledge, of the potential impacts of the Plan in combination with other plans and projects on the conservation objectives of any European site and the provision, where necessary, of mitigation or avoidance measures to preclude adverse effects. This report is divided into these two sections:

1. Screening for Appropriate Assessment Findings
2. Summary of Issues on NIR Report of Draft Development Plan and Response

1 Screening for Appropriate Assessment Findings

Recommended amendments to draft strategy, policies and objectives in the Draft Galway City Development Plan 2017-2023 have been screened for significant effects on European sites in line with requirements of Regulation 42 of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477/2011) as amended and the Planning and Development Act, 2000-2015. Table 1 provides a summary of the screening for Appropriate Assessment (AA) findings. The assessment concludes that amendments relating to recreational development proposals and the GTS and NGGCRR, strategic projects for the city, have the potential to give rise to significant effects upon European Sites, alone and or in-combination with other plans and projects, and an Appropriate Assessment is required. Planning legislation allows for additional time to facilitate this assessment and the NIR prepared for the Draft Galway City Development Plan 2017-2023 will be amended to include for the assessment. The appropriate assessment process includes identifying any potential impacts, including in-combination impacts, on the integrity of European sites. Points raised by DAHG (Submission reference number DDP.17.117) will therefore be taken into consideration in the drafting of an updated NIR.

Table 1: Summary of Screening for AA Findings of Amendments relating to Strategy, Policy and Objectives

Chapter	Amendment	Relates to	Screening for AA Summary
1 Introduction and Core Strategy	A1.1	Section 1.3 Core Strategy	Screened In
2 Housing and Sustainable Neighbourhoods	A2.2	Policy 2.2. Housing Strategy	Screened Out
	A2.4	Policy 2.5 Outer Suburbs	Screened In
	A2.5	2.12 Specific Objectives	Screened out
3 Transportation	A3.1	Revised Chapter	Screened In
4 Natural Heritage, Recreation & Amenity	A4.3	Policy 4.5.1 Greenways and PROWs	Screened In
	A4.4	Policy 4.5.1 Greenways and PROWs	Screened In
	A4.5	Policy 4.5.1 Greenways and PROWs	Screened In
	A4.6	4.7 Green Network Specific Objectives	Screened In
	A4.7	Policy 4.1 Green Network	Screened In
5 Economic Activities	A5.2	Strategy	Screened In
	A5.3	Policy 5.1 Enterprise	Screened In
	A5.4	Policy 5.1 Enterprise	Screened In

Chapter	Amendment	Relates to	Screening for AA Summary
6 Retail Strategy	A6.1	Strategy	Screened In
7 Community & Culture	A7.1	Policy 7.4.1 Community Facilities	Screened In
	A7.2	7.5. Specific Objectives	Screened Out
	A7.4	7.5. Specific Objectives	Screened Out
8 Built Heritage and Urban Design	A8.3	Policy 8.7 Urban Design	Screened In
9 Environment & Infrastructure	A9.1	Section 9.2 Climate Change Resilience	Screened Out
	A9.2	9.15 Specific Objectives	Screened Out
	A9.4	Policy 9.14 Energy and Associated Infrastructure	Screened Out
10 City Centre/Area Based Plans	10.5	10.2.5 Other City Centre Areas	Screened Out
	A10.7	Policy 10.2 City Centre	Screened In
	A10.8	Policy 10.3 Salthill	Screened In

Source: Screening for Appropriate Assessment of Recommended Amendments, May 2016

Recommended amendments to land use zoning and development objectives have also been screened for potential significant effects on European sites. Table 2 provides a summary of the screening findings. The assessment concludes that recommended amendments have the potential to give rise to significant effects upon European Sites, alone and or in-combination with other plans and projects, and are to proceed to the next stage of the AA process.

Table 2 Summary of Screening for AA Findings of Amendments relating to Land Use Zoning/Development Objectives

Amendment	Relates to	Screening for AA Summary
A3.2	Map A	Screened In
A6.2	Map A	Screened Out
A6.3	Map A	Screened Out
A11.1	Map A	Screened Out
A11.6	Rezone from CI to R at Spinnaker House Hotel site	Screened Out
A11.7	Map A	Screened Out
A11.8	Map A	Screened Out
A11.9	Map A	Screened Out
A11.10	Map A	Screened Out
A11.12	Map A	Screened Out
A11.15	Map A	Screened Out
A11.16	Map A	Screened Out
A11.17	Map A	Screened In
A11.18	Map A	Screened Out
A11.20	Map A	Screened In
A11.21	Map A	Screened Out
A11.22	Section 11.2.2	Screened Out
A11.23	Map A	Screened In
A11.25	Chapter 11, Section 11.2 Land Use Zoning General	Screened In

Source: Screening for Appropriate Assessment of Recommended Amendments, May 2016

2 Summary of Issues on NIR Report and Response

The following includes a summary of issues raised on the NIR of the Draft Galway City Development Plan 2017-2023 along with the CE response. Points raised by DAHG (Submission reference number DDP.17.117) will be taken into consideration in the drafting of an updated NIR and updates made where appropriate.

Summary of Issues raised	Response and Recommendation
General	
<p><u>Background/ Duties of a public authority/ Previous Departmental submissions</u></p> <ul style="list-style-type: none"> • GCC is competent authority for the appropriate assessment of the plan • Welcome process of preparing the NIR which will have influenced the drafting of the main policy document in a positive way • Observations refer to legislation requirements to be considered and are to assist the Council in meeting its obligations in relation to Habitats Directive and Birds Directive, Part XAB of the Planning and Development Act, 2000 as amended, and the European Communities (Birds and Natural Habitats) Regulations, 2011. • An appropriate assessment must be carried out by the Council before the plan is made, and that no plan that would have (or perpetuate) adverse effects on the integrity of a European site may be made (unless in exceptional circumstances where the provisions of Article 6(4) of the Habitats Directive, may be invoked). • The appropriate assessment is a pending step in the plan-making process and must contain complete, precise and definitive findings and conclusions with regard to the implications of the plan for the conservation objectives and integrity of a European site or sites. • The Council must take account of the NIR when this assessment is carried out, and the NIR should relate to the final iteration of the plan, including any amendments or material alterations of the current draft plan. 	<p>Acknowledged. Legislative requirement of the Habitats Directive, national legislation will be adhered to and screening is part of the development plan review process. Refer also to screening for Appropriate Assessment conclusion.</p>
<ul style="list-style-type: none"> • DAHG highlights advice and recommendations given at pre-draft stage (summary in Table 2.2 and Appendix 1 of the SEA Environmental Report, and Table 1.1 of the NIR), other submissions to Council, and/or its consultants on the existing Development Plan, variations and Local Area Plans including Ardaun and submissions to Council (and/or its consultants) and to other authorities 	<p>DAHG advice and recommendations given at pre-draft stage informed the drafting of the Development Plan and associated</p>

Summary of Issues raised	Response and Recommendation
<p>relevant or related to some specific development objectives of particular concern in draft plan. These include for example following proposed projects:</p> <ul style="list-style-type: none"> - N6 Galway City Transport Project - Galway Harbour Extension - Galway City to Barna Greenway - Galway City to Oughterard Greenway - Dublin to Galway Greenway - new Salthill (Blackrock to caravan park) - coastal protection scheme and walkway, and Sailin to Silverstrand coastal protection scheme and walkway. <ul style="list-style-type: none"> • With the exception of the Galway Harbour Extension project, no appropriate assessment has been carried out, as yet, for any of projects • Many of these future projects and uses are within or cannot avoid European sites, including some of the projects listed above which have not yet been subject to an appropriate assessment. The implications for the conservation objectives of the European sites in question have not been examined or adequately mitigated, and it cannot be excluded that adverse effects on the integrity of a European site will result. • Case law of the Court of Justice of the European Union should be taken into account in relation to the requirements and tests of the appropriate assessment, including the ‘Grüne Liga Sachsen and Others’ case, C-388/14, in relation to the construction of damaging projects that have been authorised in SACs or SPAs. Case C-258/11 (Sweetman and others) is also relevant to the plan area, and to matters of interpretation of Article 6 of the Habitats Directive in the context of appropriate assessment. 	<p>environmental reports. The NIR report identified elements of the Plan that may result in impacts on European Sites including projects listed. The screening for Appropriate Assessment (AA) of recommended amendments of the Draft City Development Plan determined that the next stage of the AA process is required; these include transport and greenway projects referred to in the DAHG submission. Planning legislation allows for additional time to facilitate Habitat Directive assessment. The points raised and relevant case law will be taken into consideration in the drafting of an updated NIR.</p>
Plan	
<p><u>Chapter 4 ‘Natural heritage, recreation and amenity’</u></p> <ul style="list-style-type: none"> • Strategy and policies to conserve protect and enhance nature conservation sites, habitats, species, and ecological networks welcomed and are wide-ranging. • Concern regarding policies and objectives referencing the use and management of ecological sites, 	<p>The Draft City Development Plan contains a strong focus on the protection, sustainable use and management of natural heritage and a commitment for development to take</p>

Summary of Issues raised	Response and Recommendation
<p>ecological networks and green areas for amenity and recreational uses, and, among other things, commitments to develop cycleways, walkways and other facilities in these areas, and to develop and increase sports and recreational activities in these areas. (see also comments referred to above and regarding map)</p> <p><u>Other Chapters</u></p> <ul style="list-style-type: none"> • Other chapters of the plan support or promote development, including changes in land use or in the likely intensity of land use. In some cases, developments and their locations are specific, and European sites will be impacted, or cannot be avoided. • As currently presented, many policies and objectives in the plan require further assessment and analysis, and mitigation at the plan level needs to be developed and specified. • Highlights that a plan should aim to manage the competing aspirations for development on the one hand, and ecological and environmental conservation and enhancement on the other; all aspects of the plan must comply with Article 6 of the Habitats Directive. It should also aim to identify areas where resources, advice and funding may need to be made available to assist in achieving certain development objectives, particularly when considering suitable project sites or options, when assessments are required, and when Council or community projects are involved. • Suggests that mitigation might include <ul style="list-style-type: none"> - ensuring that policies and objectives with impacts on European sites are omitted, particularly from maps, and that the commitments instead are to explore future options to deliver the particular development objective. eg cycleways and walkways on map - Revise or strengthen wording so that, for example, ‘sustainable’ is defined in part to mean that adverse effects on the conservation objectives and integrity of European sites (and also NHAs) will not result. • Considers that widely used approach of requiring project-stage assessment and compliance is not promoted as appropriate mitigation by this Department, but, together with other revisions of the plan, may assist in allowing the plan to proceed without reference to Article 6(4) of the Habitats Directive. • In the absence of changes or more appropriate mitigation, it cannot be excluded that adverse effects on the integrity of a European site would result from this and similar objectives. 	<p>place in an environmentally sustainable manner. The comment welcoming the inclusion of strategy and policies to conserve protect and enhance nature conservation sites, habitats, species, and ecological networks is noted. Concern regarding policies and objectives referencing the use and management of ecological sites, ecological networks and green areas for amenity and recreational uses, other chapters of the plan will be reviewed in the drafting of an updated NIR.</p>

Summary of Issues raised	Response and Recommendation
<ul style="list-style-type: none"> • Considers that following are among some of plans policies/ objectives that pose particular risks to European sites and suggests that omit or reword the following: <ul style="list-style-type: none"> - Omit or reword <i>Policy 3.3: Continue to progress a sustainable transport solution for the city through the implementation of measures included in the Integrated Transport Management Programme (ITMP) and Specific Objective 3.9: Prepare an Integrated Transportation Management Programme (ITMP) for the city in conjunction with the NTA, Galway County Council and other relevant state agencies.</i> In the absence of the detail of the ITMP and its NIS (or NIR), these should be omitted or reworded, or plan preparation should await the availability of the ITMP and its NIS/NIR. The appropriate assessment should cover both elements in combination. It is noted that the ITMP and N6 GCTP initiatives, which are interrelated, include a new road that traverses SAC areas and cycleways that are to be developed within European sites, meaning that it cannot be excluded that each component on its own, and in combination with other plans and projects, will have adverse effects on the integrity of a European site. • Reword <i>Provide cycleways along the following routes: From the City Centre to the eastern city boundary having regard to the Galway to Dublin Cycleway; From the City Centre to Bearna; From the City Centre to Moycullen</i> to indicate that suitable routes for such cycleways will be explored, taking ecological constraints, the likely effects on European sites in view of their conservation objectives, and in combination effects of other plans and projects into account. • Reword <i>Construct a new pedestrian and cycle bridge on the piers of the Old Clifden Railway Line from Waterside to NUIG</i> to indicate that a suitable option for a bridge will be explored, taking ecological constraints, the likely effects on European sites in view of their conservation objectives, and in combination effects of other plans and projects into account. - In relation to <i>Specific Objectives 9.15: Complete the Sailin to Silverstrand Coastal Protection Scheme and walkway from Blackrock to Silverstrand</i> highlights that an NIS is required for the foreshore component of this development in connection with the foreshore licence. The development is located within two European sites, and will have direct and permanent effects, and possible indirect and in combination effects, on the conservation objectives of these sites. Some of these conservation objectives may also be adversely affected in the case of the Galway Harbour Extension project - In relation to <i>Policy 3.8: Galway Port and Other Transport Facilities – Support the future viability of Galway Port including proposals for development and extension of port facilities and an extension of the rail line to the port</i> and <i>Policy 5.1: Enterprise – Support the sustainable</i> 	<p>The Draft Plan includes policy so plans and projects, which cannot be predicted at the Development Plan level, will be subject to separate assessment procedures in accordance with all applicable Regulations and Directives. Proposed mitigation measures will be reviewed in the drafting of an updated NIR.</p>

Summary of Issues raised	Response and Recommendation
<p><i>development and extension to Galway Harbour subject to environment, visual, economic viability and transportation requirements</i> DAHG understands that, if the Galway Harbour Extension project proceeds in its current form, it will have adverse effects on the integrity of at least one European site that require all necessary compensation measures to be taken to ensure the overall coherence of the Natura 2000 network is protected. The proposed development is currently under consideration by An Bord Pleanála in the context of Article 6(4) of the Directive</p> <p><u>Other points</u></p> <ul style="list-style-type: none"> • Screening for appropriate assessment, and appropriate assessment requirements, where necessary, will arise in relation to the Local Area Plans and other area plans that are to be prepared or completed, as per the policies and objectives in the current plan. SEA obligations will also arise. • Caution should be exercised in supporting other plans and strategies, or in giving effect to their recommendations for development and land uses, if such plans or strategies cannot demonstrate their own compliance with the Habitats Directive or if they are subject to appropriate assessment as part of the current plan • Policies for a 10m buffer beside the River Corrib welcomed, it may not suffice as a protective measure, and all plans or projects beside the river, and infrastructural maintenance works, will require screening for appropriate assessment, including in order to establish planning requirements. • Appropriate assessment requirements are likely to arise in relation to the master plan for Lough Atalia and Renmore Lagoon Both areas support Annex I priority habitat and are closely linked to the Galway Harbour Extension project. • Amend references in plan including Legislative Background’ page 6 to clarify that terms ‘NIR’ and ‘appropriate assessment’ and when the latter is carried out. • The Council should further consider NIR findings of Draft Plan and whether clear, precise and definitive conclusions of the appropriate assessment may be reached. <p><u>Map</u></p> <ul style="list-style-type: none"> • Revise map to address concerns relating to projects referred to above and concern that there is no distinction is made between European sites and other green or blue (marine) areas. 	<p>Development Plan policy informed by other plans and strategies has undergone Habitat Directive assessment. Policy is incorporated in the Draft Plan to ensure that Local Area Plans and other area plans adhere to the requirements of the Habitats Directive. The points raised will be considered the drafting of an updated NIR and the Council will further consider NIR findings following Habitat Directive assessment and updating of the NIR.</p> <p>The Plan will be reviewed to remove any ambiguity relating to the use of the terms NIR and Appropriate Assessment.</p> <p>Figure 4.3 of the Draft Development Plan highlights European sites within the city. Concerns relating to projects listed above</p>

Summary of Issues raised	Response and Recommendation
<ul style="list-style-type: none"> Review and revise the zoning of one part of an SAC as ‘residential’ as part of a ‘village envelope’ in Menlough area 	<p>will be reviewed in the drafting of an updated NIR. No proposed zoning change is recommended in the Menlough area, policy 4.2 and development standard 11.31 ensure that development projects adhere to the requirements of the Habitats Directive.</p>
<p>NIR of Draft Galway City Development Plan 2017-2023</p>	
<ul style="list-style-type: none"> Amend NIR Section 1, and NIR Section 5 to clarify that terms ‘NIR’ and ‘appropriate assessment’ and when the latter is carried out. 	<p>The NIR will be reviewed to remove any ambiguity relating to the use of the terms NIR and Appropriate Assessment.</p>
<ul style="list-style-type: none"> Notes that potential impacts on European sites are listed in NIR Table 3.5 and in Appendix C Some of the existing threats and pressures on European sites are further detailed in NIR Section 3.3.7 states as follows: <i>“The coastal area of Galway City is a popular destination for leisure and port activities in the County. Leisure activities and developments along the coastline of Galway City are likely to place increasing pressure on the ecology of coastal areas. Cycle routes, road developments and leisure facilities in close proximity to the coast line add to this pressure, with potential impacts to coastal/marine European sites including direct habitat loss, disturbance or fragmentation; reduction in water quality; destruction of wetlands; bird disturbance; and the risk of introducing invasive species.”</i> These adverse effects are not further assessed and analysed in the NIR in the context of the residual effects after mitigation. While adverse effects of the plan are identified with respect to Galway Bay Complex cSAC, Lough Corrib cSAC, Inner Galway Bay SPA, and Lough Corrib SPA, few specifics about which of the sites and which of their conservation objectives may be affected. An NIR must consider the likely effects of a plan or project in combination with other plans and projects. No projects are listed in the NIR in relation to potential cumulative or in combination effects. Examples outlined above. 	<p>Noted. Section 3.5 Potential impacts on European sites and 3.6 Potential cumulative impacts will be reviewed in the drafting of an updated NIR.</p>
<ul style="list-style-type: none"> Approach to mitigation in the NIR relies on policies and objectives which are generally, but not always, protective. 	<p>Existing and additional mitigation measures in the Draft Plan to avoid or reduce the</p>

Summary of Issues raised	Response and Recommendation
<ul style="list-style-type: none"> • Some of these policies and objectives allow for or promote development and uses, including amenity and recreation uses and associated infrastructure, or other specified or potential developments, or are not clearly protective or mitigatory, e.g. policy 4(1), 4.1(1), 4.1(4), 4.2(10), 4.3(3), 4.3(9), 4.3(13), 4.3(14), 4.3(17), 4.6.2(5), 5.1(16), and 9.3(10). • It is not shown in the NIR how it was determined that reliance on protective policies will suffice, whether at the specific project level or when assessing the cumulative or in combination effects. • Many policies and objectives in the plan, as currently worded and set out, will have adverse effects on the conservation objectives and integrity of European sites. • Section 4.2 Assessment of mitigation measures is not of the residual effects, following the implementation or incorporation of mitigation, and there is no examination, for example, of whether or not the adverse effects identified in Table 3.5 are addressed adequately or at all. • Plan-level mitigation must be demonstrated to be effective in addressing and ameliorating the full range of any adverse effects on the conservation objectives and integrity of European sites that would arise from the plan, or that already exist and may be perpetuated or worsened by the implementation of the plan. • Section 5 AA conclusion is not supported by the assessment and analysis in preceding sections of the NIR. 	<p>potential for impacts on the integrity of European sites are set out in section 4. Key mitigation measures relate to policies set out in Policy 4.2: Protected Spaces: Sites of European, National and Local Ecological Importance. Other policies and objectives incorporate mitigation measures. Drafting of the updated NIR will highlight the key mitigation measures in the Development Plan and consider the comments made on mitigation and the AA conclusion.</p>
<ul style="list-style-type: none"> • The Council should take account of changes in the plan addressed in the Manager’s Report or an addendum to the NIR, in addition to the current NIR, when carrying out the appropriate assessment. 	<p>Legislative requirement of the Habitats Directive, national legislation will be adhered to and the Council will further consider NIR findings following the Habitat Directive assessment / updating of the NIR.</p>

SFRA:

Consideration of Submissions and Proposed Amendments in relation to Strategy, Policies, Land Use zonings and Specific Objectives:

The EU Floods Directive and *Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)* emphasises the importance of considering flood risk assessment in the Development Plan and a Strategic Flood Risk Assessment (SFRA) has informed the City Development Plan review process. The following includes a summary of issues raised on the SFRA of the Draft Galway City Development Plan 2017-2023 along with the CE response.

Summary of Issues Raised	Response and Recommendation
<ul style="list-style-type: none"> • Welcomes SFRA of Draft Plan and in particular consideration of flood risk in drainage design and requirements for stage 2 and stage 3 FRA in site specific cases. • Acknowledges detailed <i>Policy 9.3 Flood Risk Assessment</i> in regard to flood risk management • Welcomes recognition of the role of wetlands and riparian zones as flood alleviation resources • Notes that OPW coastal zone protection study has been taken into account in commitments relating to coastal zone management and that Plan includes the need for coastal zone management objectives. • Plan should ensure flood risk assessments are carried out for the LAPs (and any key opportunity sites/proposed infrastructural development locations) to guide/inform the appropriate zoning and development. • Recommendations of the SFRA reflected in the Plan should be subjected to any environmental assessments necessary • The planning authority should have regard to any issues raised by the Office of Public Works in relation to SFRA and satisfy themselves that they have adhered to <i>The Planning System and Flood Risk Management - Guidelines for Planning Authorities (Nov 09)</i>. • Should the SFRA require revision, take account of recommendations from OPW or other flood risk working groups. 	<p>Comments welcoming the inclusion of detailed flood risk assessment policy and of policy relating to flood alleviation resources are noted.</p> <p>The Draft Plan includes policy to adhere to the <i>Planning System and Flood Risk Management - Guidelines for Planning Authorities (Nov 09)</i> and for plans and projects to be subject to separate flood risk assessment in accordance with all applicable Regulations and Directives. Policies in other sections of the Plan with regard to climate change resilience also contribute to addressing flood risk.</p> <p>Recommendations from the OPW or other flood risk working groups has been reviewed and taken into account along with flood risk</p>

	advice on submissions and on the SFRA.
<ul style="list-style-type: none"> • Flood risk assessment is guided by a three stage process of identification of flood risk, stage 2 initial flood risk assessment and stage 3 detailed flood risk assessment. • The overall principle is to adopt a precautionary approach and to direct development to areas with minimal risk and that appropriate land use be incorporated in areas where flood risk is unavoidable. • Consider future climate scenarios in terms of predicted higher sea levels and periods of increased frequency of storm conditions and associated flooding and implications for land use zoning/development. • For completion of the SFRA stage 2, truthing of the CFRAMs maps are required to confirm flood extents. • Clarify whether the SFRA and Plan take into account the observed effects recent storm events (end 2015/ start 2016). • Highlight that detailed stage 3 FRA may be required depending on a sites' vulnerability and risk of flooding and that site specific FRA will be based on an undefended flood defence scenario. • For completion of the SFRA stage 2, truthing of the CFRAMs maps are required to confirm flood extents. • Highlight that the CFRAM flood maps when finalised will supersede the extents of the Draft Plan. • Ensure that zoning and associated development is appropriate to the risk of flooding identified in accordance with the Flood Risk Management Guidelines (DECLG, 2009) and incorporate any relevant recommendations of the Western CFRAMS, currently under preparation. • Consider additional measures to avoid inappropriate residential / mixed use development in areas of potential significant flood risk or coastal erosion. This should be informed by the SFRA and relevant aspects of the Western CFRAMS upon its adoption. 	<p>Future climate scenarios have been addressed in the SFRA and recent flood events are confirmed in the SFRA.</p> <p>The SFRA recommends to update with finalised CFRAM mapping when available.</p> <p>CFRAM maps have been site verified by the JBA CFRAM modelling team under the Galway SFRA and are fit for purpose.</p> <p>Recommendations for Stage 3 FRA and approach regarding defences are robust and no further adjustments recommended.</p>
<ul style="list-style-type: none"> • More detailed Mapping in Section 8, in particular around the city centre and Nuns island, is required to enable accurate identification. • A map of the flood zones overlaying the draft zonings would provide greater clarity. 	<p>Mapping in section 8 can be improved to enable better identification. Amendment is recommended to provide mapping at a larger scale in the SFRA appendix</p>
<ul style="list-style-type: none"> • Undeveloped residential zoned lands along the Headford road are located are largely within Flood zone A or B and therefore a justification test is necessary for this site given the risk to highly 	<p>These lands do not meet the justification test as set out in the Planning System and Flood Risk Management Guidelines for</p>

vulnerable uses.	Planning Authorities (2009). They are largely within the Flood Zone A and as such only water compatible development would be considered appropriate. Amendment is recommended to rezone from R zone to RA zone - lands near Suan and Brookdale along the Headford Road which are subject to flood risk.
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SFRA Assessment of Proposed Amendments Summary

All policy amendments and land use zoning/specific objectives amendments were reviewed and assessed having regard to the *Planning System and Flood Risk Management - Guidelines for Planning Authorities (2009)*, submissions received in particular from the OPW and mitigation outlined in Chapter 9, Section 9.3 Flood Risk Assessment which ensures that flood risk is considered for all development proposals.

All Galway Transport Strategy (GTS) related Proposed Amendments to the Draft Plan will be further considered under the SFRA. It has been determined that various measures of the proposed Galway Transport Strategy have potential flood risk and a Flood Risk Assessment for the Strategy is required. The findings of this assessment will inform the SFRA of the City Development Plan.

Existing residential (R) zoned lands near Suan and Brookdale along the Headford Road have been reviewed. These lands are largely within Flood Zone A. These lands do not meet the justification test as set out in the *Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)* and therefore an amendment is recommended to change the zoning to an RA Land Use Zoning. It is proposed to amend the SFRA to reflect this proposed amendment.

Department of Environment, Community and Local Government (DECLG)(DDP.17.57):

Section 12 of the Planning and Development Act 2000 (as amended) requires that the CE report summarises the issues raised by the Minister for Environment, Community and Local Government and give the response of the Chief Executive.

Summary of Issues Raised

- The Draft Plan provides a strategic framework for the proper planning and sustainable development of the area and gives spatial expression to the economic, social, cultural and environmental aims of the City.
- It provides a well thought out and comprehensive planning assessment of Galway City
- The mapping of geo directory commercial and retail address points is beneficial when focusing on economic and retail activity providing strong baseline data from which to work from. And it is noted from analysis there is no increased need for additional zoned or otherwise designation of lands for retail from that zoned in the 2011 – 2017 City Plan.

Core Strategy:

- The core strategy allows for the RPG targets to be achievable through the combination of land availability of residential zoned land, regeneration areas, vacancy and Ardaun phase 1. The core strategy figures appear in line with National and Regional guidelines.
- A number of specific objectives within the Draft Plan allow for residential development to be considered within specific areas of different land use zonings which allows for a degree of flexibility and adaptability in terms of residential land availability within the urban setting of Galway. To ensure transparency a Specifics Objective Map highlighting the objectives and reference this cohort within the core strategy should be considered.

Housing Availability:

- Include reference to the Urban Regeneration and Housing Act 2015 within section 2.0 Housing and Sustainable Neighbourhoods specifically referencing the vacant site levy.
- Outline the implications of the introduction of this levy in Galway City.
- Include in chapter 2 a table identifying sites that are unconstrained and are available for residential development, lands zoned that will be ready for development within the medium term (within next five years), and zoned residential land that is currently constrained and not available for development due to reasons such as infrastructural issues. This would assist in alignment of demand and supply, allow for a focused and transparent active land management system and assist in the developing the housing market.

Section 28 Guidelines:

- Reference to Section 28, Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2015 should be incorporated into the draft plan, particularly within chapter 2 Policy 2.2 Housing Strategy and in the Residential Densities text in Section 2.4; in chapter 11 Section 11.3 Residential Development regarding private open space standards and in Schedule 2, page 210.
- If the planning authority has formed the opinion that it is not possible to implement certain policies and objectives contained in Section 28 guidelines a reasoned justification for this approach by way of explanation needs to be set out in the Plan.

Climate Adaptation:

- Make reference to the *National Climate Change Adaptation Framework, 2012* and Galway City's commitment to its implementation in chapter 9, section 9.2. The framework provides for preparation of Local Adaptation Plans through the development plan review process.
- Include a policy in section 9.2 expressing the Council's commitment to climate adaptation and the preparation of local adaptations plans.

Environmental Appraisals:

- The planning authority should satisfy themselves in consultation with the National Parks and Wildlife Service that the draft plan is fully compliant with its obligations under the relevant Strategic Environmental Assessment (SEA) and Habitats Directive Assessment (AA) Directives.
- The planning authority should have regard to any issues raised by the Office of Public Works in relation to SFRA and satisfy themselves that they have adhered to *The Planning System and Flood Risk Management - Guidelines for Planning Authorities (Nov 09)*.

General:

- If the planning authority has formed the opinion that it is not possible to implement certain policies and objectives contained in Section 28 guidelines a reasoned justification for this approach by way of explanation needs to be set out in the Plan.

Response:

The CE thanks the Department for making a submission and welcomes their comments. In particular the CE welcomes the view of the Department that the Draft Plan provides a strategic framework for the proper planning and sustainable development of the city.

In relation to the request to consider the preparation of a Specific Objectives map for lands/landuse zones which may accommodate specific requirements/allowances for housing, these specific objectives do not lend themselves to be transferable to an overall specific objectives map. Many specific objectives have very particular considerations in text and it would not be feasible to include on one map. In certain cases it is considered that these specific objectives are more appropriately dealt with in the written statement of the development plan with specific text and where appropriate a detailed small map inserted- as already exists in Chapter 11.

In order to give greater clarity it is recommended that a clear statement be included in the legend of Map A and B referring to specific objectives in Chapter 11 and specific objectives at the end of each chapter and that these should be read in conjunction with the map.

With regard to reference to specific objectives in the core strategy in relation to housing, section 1.6 and table 1.2 refers to these cohorts in terms of the estimated capacity of housing – for LDR, regeneration and mixed use zones.

With regard to inclusion in the plan of Section 28 guidelines in relation to revised Design Standards for New Apartments, these guidelines were introduced subsequent to the completion of the draft plan and it is recommended that the plan be updated to include reference to these.

In relation to the Vacant Site Levy introduced under the Urban Regeneration and Housing Act 2015, it is recommended that the draft plan be amended to include for this.

In relation to the recommendation to include in chapter 2 a table identifying residential sites and lands and their constraints, it is considered that the provision of such a table is not feasible or appropriate. There are a range of issues which impact on the development of residential sites within the city and which are not easily tabulated. The development of housing sites in the city is complex and dynamic and can be affected by many constraints which are not readily identifiable and attaching timescales to their development would not be prudent. Constraints associated with various sites across the city are more readily dealt with through pre planning meetings which tease out complex issues and give detailed direction to developers. The Core Strategy highlights undeveloped lands suitable for housing and sets out a clearly defined settlement strategy which sets out where priorities for infrastructure are required. The Housing Strategy in Schedule One - P198 S1.4 Analysis of housing demand and supply gives further detail to the availability of lands and gives considered outputs up to 2023.

It is recommended that the Draft Plan is amended to include a map in Schedule 1– Housing Strategy that will highlight all undeveloped residential zoned lands and other locations where residential development can be delivered on other zonings as referenced in the Core Strategy. This illustration will give further clarity on availability of residential lands. It will be inserted when all zonings have been finalised and adopted by the Elected Members.

In relation to climate adaptation, it is recommended that the plan be amended to include in Chapter 9 reference to the *National Climate Change Adaptation Framework, 2012* and commitment to its implementation as requested by the Department.

With regard to environmental appraisals, the comments of the Department are noted and consideration of SEA/AA and SFRA is being carried out in consultation with the relevant bodies and informs the overall development plan process. Comments in relation to compliance with 28 Guidelines are also noted.

Recommendation:

It is recommended that the Draft Plan is amended and the following proposed Amendments have been included in Part 3 of the CE Report as follows:

- A2.1 Reference in Chapter 2 and in the Housing Strategy Schedule 1 S1.2 to the *Urban Regeneration and Housing Act 2015* with regard to vacant site levy.
- AS1 - Insert in Schedule 1 Housing Strategy a map of all undeveloped residential zoned lands and other locations where residential development can be delivered on other zonings.
- A11.1 - Insert in map legend wording that specific objectives in Chapter 11 and specific objectives at the end of each chapter should be read in conjunction with the map.
- A11.2 and AS1.2- Insert reference to new Section 28 Ministerial Guidelines - *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2015* and also insert in chapter 11.3.
- A9.1, A9.2, A9.6 – Insert reference to climate change and climate adaptation.

Northern and Western Regional Assembly (DDP.17.123):

Section 12 requires that the CE report summarises the issues raised and the recommendations made by the Northern and Western Regional Assembly and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the Draft Development Plan.

Summary of issues raised and recommendations

The submission sets out a range comments on a chapter by chapter basis. It compliments the high quality of the plan in terms of format and presentation stating that the plan can help provide an achievable outcome for the development of the city.

Chapter 1 Core Strategy:

- In relation to the emerging Integrated Transport Management Programme and the N6 Galway City Transport Project, the Assembly considers that the Development Plan would benefit from these documents being incorporated into the plan in order to ensure compliance with the Strategic Goals for the West Region in relation to Spatial Structure, Access, Service Infrastructure and Economic Development.
- Further consideration of the exact route alignment of the N6GCTP can be accommodated in the Plan making process timeline.
- Objectives to prepare LAPs, Masterplans, Guidance documents and strategies should be accompanied by a delivery schedule with a rationale for their prioritisation.
- The Assembly suggest that the sub-regional requirements which support the selection of Ardaun as a Greenfield development be referenced or included in the Draft. It would also advise that information be given on the economic costs of developing infrastructure and essential community services and their prioritisation in the Draft Plan.
- Clarify if Ardaun is included as contributing to the targets for residential development in the Regional Planning Guidelines.

Chapter 2 Housing:

- The population targets referred to in the Draft Plan acknowledge the targets outlined in the RPG. These are minimum targets. The Assembly accept that sufficient lands are proposed to be zoned in the Draft Plan to achieve RPG targets- which are minimum targets.
- The plan would benefit from the phasing and prioritisation of releasing undeveloped and underdeveloped land together with a strategy to spatially target the co-ordinated provision of infrastructure being included in the plan.
- The Assembly note that there are many low Density Housing Zones within the Draft Plan. In light of the Gateway status of the city and ground conditions especially to the east of the Corrib, the use of on-site sewage treatment systems should be considered only in exceptional circumstances and where appropriate maintenance/taking in charge arrangements are confirmed.

Chapter 3 Transportation:

- The Assembly suggest that the emerging preferred route for the N6 be included in Draft City Development Plan in order that it may be considered in the planning process for the city.

Chapter 4 Natural Heritage and Recreation and Amenity:

- Objectives for Masterplans, Conservation Plans and Environmental plans should include a time-frame for their delivery.

- Galway City Council must satisfy itself that it complies with the Habitats Directive and the Assembly notes the submission of the DAHG as part of the consultation on AA. Particular reference is made to the Harbour expansion and N6GCTP being two major infrastructure proposals supported by the draft City Development Plan.

Chapter 5 Economic Activities:

- Elaborate on the emerging Draft Economic Strategy, how it might compliment and be consistent with the various development strategies and objectives in the Draft City Development Plan.
- The objective to have Galway designated as a European Capital of Culture 2020 has been formally supported by the Assembly.
- The Assembly acknowledges that the Core Strategy presents the quantities of and for employment uses and states that the co-ordinated development of infrastructure to facilitate such uses will be needed to realise potential. In this regard an implementation/prioritisation strategy would give clarity on the delivery of jobs identified in the LECP and the Action Plan for Jobs.

Chapter 6 Retail Strategy:

- Include an indicative timeline for preparation of the joint retail strategy.
- Joint Retail strategy would inform the preparation of future LAPs and Masterplans and would help secure the primacy of the City.
- The retail strategy could examine the impact of emerging trends of on-line shopping and its impact on the city.

Chapter 7 Community and Culture:

- An extensive number of projects are outlined in 7.2. A timeframe for the delivery of these projects could be included as an appendix together with the stage they are at in the delivery process.
- Clarify if the Cultural Development Strategy is a joint project with the county.

Chapter 8 Built Heritage:

- Policies fully accord with the policies of the Assembly set out in its Regional Planning Guidelines.

Chapter 9 Environment and Infrastructure:

- Accords with similar objectives in the Regional Planning Guidelines.
- The infrastructure development environment has changed significantly in areas such as financing and in set up of Irish Water and other utilities which brings new opportunities and challenges for delivery. Delivery of projects could be formally included in the future monitoring and evaluation report of the Council.
- Update text to take account of COP21 (the Paris agreement) and the Climate Action and Low Carbon Development Act 2015 where necessary.

Chapter 10 City Centre /Area Based Plans:

- The main issues arising have been commented on above.
- As part of alternative options in the SEA, the Council should consider whether an option of new development could be more sustainably directed towards areas already serviced which may be a more informative alternative to be considered in preference to that described in Scenario 1 Chapter 6 of the SEA.

Response:

The CE thanks the NWRA for making a submission and welcomes their comments.

In relation to the incorporation of the ITMP and N6GCTP documents into the Plan, it should be noted that these studies have advanced significantly and are known as the Galway Transport Strategy (GTS) and the N6 Galway City Ring Road (N6GRR). It is considered appropriate to incorporate the policies and specific objectives of the GTS into the Plan in particular in the Core Strategy and Chapter 3. It should be noted that Chapter 3 is being amended in its entirety to reflect the incorporation of the GTS. Other amendments are also being brought forward to incorporate the GTS into Chapters 2, 4, 5, 8, and 10. These amendments also include for incorporation of text in relation to the N6GCRR and its current status.

In the interests of clarity and transparency, it is also considered appropriate to map the more significant GTS objectives and the strategic N6GCRR objective.

With regard to inclusion of a delivery schedule for LAPs, Masterplans and Guidance documents and a rationale for prioritisation, it is not considered feasible to include these in the Plan. Some will be dependant on availability of funding/resources available to the council and on work priorities which may change over the period of the Plan. Some will be carried out by the private sector in advance of development and would be market dependant. Others factors such as production of government guidance and availability of EU funding will influence delivery.

With regard to the settlement strategy and Ardaun reference is made by the Assembly to the sub-regional requirements for Ardaun. The current RPGs for the west region have adopted the recommendations of the original sub regional study known as the GTPS. Ardaun has been part of the established settlement policy of the city in the current Development Plan and previous Plan and also adopted in the current and last county Plan. It is therefore not considered necessary to specifically refer to the GTPS in the Core Strategy and reference to implementation of the Regional Planning Guidelines which are considered in section 1.4 of the Core Strategy is considered sufficient.

With regard to setting out the economic costs of developing infrastructure and essential community services and their prioritisation, it is considered that this is more appropriate for inclusion in the detailed Ardaun Local Area Plan which is currently under preparation. As stated in Section 1.3 *Core Strategies are required to give a strategic picture only..... These, in conjunction with the broadened details included in the balance of the Plan, should provide a robust enough case to benchmark future planning decisions as being consistent with national and regional policy.*

With regard to inclusion of Ardaun to meet population targets set in the RPGs, these lands are necessary to meet the RPG targets and Phase 1 is included in Section 1.6 and table 1.2 of the Core Strategy. Key conclusions of the Housing Strategy in Schedule 1(S1.6 key conclusions) include

- *It is estimated that the 2022 RPGs targets for population will generate a demand for **8,255** housing units.*
- *This demand for housing cannot be solely satisfied on lands zoned for residential development and will require the residential element of Ardaun LAP to be developed also.*
- *Ardaun is required to meet the estimated need for housing under the RPGs targets but these lands will require significant infrastructural investment to deliver housing.*

In relation to phasing and prioritisation of undeveloped and underdeveloped land and a targeted infrastructure strategy, it is considered that the Core strategy sets out priorities in terms of development lands in a clearly defined settlement strategy and together with the Housing Strategy

identifies where infrastructural investment is required. All the undeveloped residential lands in the city are considered priority sites in order to meet population targets. The Housing Strategy in Schedule One - P198 S1.4 Analysis of housing demand and supply gives further detail to the availability of lands and gives considered outputs up to 2023.

To give further clarity on housing land availability, it is recommended that the Draft Plan is amended to include a map that will highlight all undeveloped residential zoned lands and other locations where residential development can be delivered on other zonings as referenced in the Core Strategy. It will be inserted when all zonings have been finalised and adopted by the Elected Members.

In relation to the use of on-site sewage treatment systems in LDR zones to be considered only in exceptional circumstances and where appropriate maintenance/taking in charge arrangements are confirmed, this is noted. These LDR areas provide an important function in the city, they contribute to the diversity of housing in the city allowing for a wider choice in house type. Many of these areas are serviced or will become serviced by main drainage in the coming years and development will only be considered where it accords with main drainage proposals. Chapter 11 sets out requirements for a range of LDR areas in the city. As part of the development management process these sites are comprehensively assessed for their suitability for treatment of effluent and as part of any permission would include requirements for maintenance agreements.

With regard to specific objectives for plans in chapter 4 in relation to Natural heritage, Recreation and Amenity, the council concur that this is a large body of future work and as stated above, it would be difficult to incorporate delivery timescales. In chapter 4 we have grouped objectives into short term and medium/long term.

With regard to compliance with the Habitats Directive, the Assembly comments are noted, this is an ongoing process and the Draft Plan and all amendments are being considered under both AA and SEA.

With regard to the emerging Economic Strategy, it is considered that chapter 5 is consistent with, and reflects all current economic frameworks. An implementation/prioritisation strategy to give clarity on delivery of jobs in the LECP and Action Plan for Jobs is considered more appropriate as part of their remit. It is considered that sufficient detail is set out in the core strategy and Chapter 5 in this regard.

With regard to a timeline for preparation of a joint Retail Strategy between City and County, reference is made in Chapter 6 to the specific objective from the County Plan -. *Objective R3 – Retail Survey and Strategy (a) To Engage with Galway City Council to produce a Retail Strategy within 3 years of the adoption of the Development Plan; (b) To commence and complete retail surveys of all major towns listed in the Core Strategy Settlement.*

Chapter 6 further states that *any requirement for change in policies and objectives consequent on the outcome of the retail study and strategy will have capacity to be incorporated at a later stage in the plan making process for this Plan or by variation to both development plans.* This wording is considered sufficient. An examination of on line shopping trends can be included as part of the brief for this project.

With regard to a delivery schedule of projects under the Cultural Development Strategy, this is not feasible, as many of the projects are outside the ambit of the Plan, many are community projects or may be private or corporate and/or subject to Council budgeting on an annual basis. The Cultural strategy is a joint strategy with City and County Councils.

With regard to climate change policy, as recommended by the Assembly, Chapter 9 Environment and Infrastructure will be updated reflect advances in international and national climate change policy that have occurred since publication of Draft Plan.

With regard to options for new development and the alternative scenarios considered in Chapter 6 of the Environmental Report, it is not considered appropriate to have a scenario to direct City population to the County area. This would be contrary to the requirements of the Department to adhere to specific population targets for the city and development of a critical mass in the city to sustain services and enhance the role of the city as regional capital and gateway is part of established policy.

Recommendation:

It is recommended that the Draft Plan is amended, the following proposed Amendments have been included in Part 3 of the CE Report as follows:

- AS1 - Insert in Schedule 1 Housing Strategy a map of all undeveloped residential zoned lands and other locations where residential development can be delivered on other zonings.
- A1.1, A2.3, A2.4, A3.1, A3.2, A4.1, A4.3, A4.4, A4.5, A4.6, A5.1, A5.2, A5.3, A6.1, A7.1, A8.2, A8.3, A10.1, A10.2, A10.3, A10.4, A10.6, A10.7, A10.8, A11.13 and A 11.27 relate to the GTS and the N6GCRR.
- A9.1, A9.2, A9.6, relate to climate change and climate adaptation.

Maps

Summary of issues raised and recommendations

- Ensure that policies and objectives with impacts on European sites are omitted, particularly from maps, and that the commitments instead are to explore future options to deliver the particular development objective, e.g. cycleways and walkways on map.
- Notes boundary anomaly at Harbour Enterprise Park and suggests revision.

Response:

The Draft Plan proposes a network of greenways throughout the city, which will provide alternative circulation routes for pedestrians and cyclists, as proposed in the GTS, and for recreational and amenity use. Greenways are shown indicatively to allow for flexibility in the route, to take account of site-specific circumstances including the sensitivity of the natural environment and protected habitats and the presence of European Sites. Section 4.7 Specific Objectives of the Draft Plan, stipulates that all projects, plans and development , (including greenways), with the potential to have a significant impact on the integrity of European Sites will be subject to Habitats Directive Assessment. The boundary anomaly at Harbour Enterprise Park is a Local Government Act issue and outside the remit of the Plan.

Operational/Outside the remit of the Development Plan

The following points raised in submissions are operational and /or are outside the remit of the Draft Development Plan as a land use plan.

Community and Culture:

- Equality mainstreaming training should be provided to public sector workers including all at Galway city council and its public representatives.
- Include objectives to encourage students to avail of opportunities to use Irish outside of the school system.
- Provide training and ongoing capacity development including for designated local authority staff, decision makers
- Galway City Council to work in cooperation with Údara na Gaeltachta in implementing the language planning processes in Gaeltacht service towns in Galway City Gaeltachts.
- Preparation of Irish language plans to ensure Irish is intertwined in all aspects of public life.
- Encourage Galway City Council to maintain its support for Irish language cultural events & centres in the city.
- Requirement to provide increased Irish language pre-school services (Naionra's) to expose children to Irish as a young age.
- Organise learning events in conjunction with Galway Healthy Cities for example on HIA, Urban Planning and Design.
- Include under Policy 4.3 Blue Spaces: Coast, Canals and Waterways a new policy to permit the sustainable harvesting of washed-up seaweed by local community gardens.

Housing:

- Seeks map of Council owned lands.
- Review the Scheme of Allocations and refer to management of the HAP system.
- Insert a new policy under Policy 2.2 Housing Strategy to support and facilitate fuel poverty alleviation with deep-retrofitting and using energy service companies and community enterprise co-ops.
- Realistic projections of Traveller accommodation be required annually.
- The Traveller Accommodation Programme did not meet its targets and an independent review of this is required.
- Support research in sustainable Housing through open architect competitions; creation of a public Architectural Database of the city.
- Inspectorate of HAP properties required.
- Replacement of Part V with 1% levy on the sale of new and existing units is more equitable.

Enforcement:

- Question regarding if change of use is legitimate and if charges have been paid.
- Enforce against unauthorised satellite dishes.
- Improve litter management and satellite dish enforcement.
- Support the implementation of byelaws in relation to the consumption of alcohol in public places.
- Enforce breaches in relation to light pollution conditions.
- Provide building conservation services and quicker enforcement regarding protected structures.

Transport:

- Have a LEAP card structure for single trip bus transfers.
- Pilot the provision of zebra crossings and associated traffic calming at all city roundabouts.
- Conduct a review of all pedestrian crossing signals and a review of all kerb radii in the city.
- Require a 'road works improvement scheme' to create a pedestrian, cyclist, child and disability friendly city and implement a 'Golden Mile' programme.
- Insert a requirement to install Advance Stop Lines (ASL) of adequate size (5m depth) at every junction throughout the city and undertake to increase driver awareness of ASLs.
- Require speed monitoring measures to ensure compliance with speed limits.
- Require a pilot scheme, to operate speed cameras within the 30km/h zones.
- NTA should enable regional centres to meet international and national policy and maintain quality of life, connectivity and economic competitiveness.
- Need for NTA to address transportation planning in order to address congestion and car based traffic in greater Galway /regional area and promote sustainable transport modes.
- NTA should introduce measures to reduce and monitor greenhouse emissions, promotion of sustainable travel modes, city unified ticket scheme, management of school based travel, integrated traffic management, regulation of HGV transport, integrating pricing parking structure.
- Commit to developing health and well being sponsorship criteria to ensure that public transport schemes, such as 'Coke Zero Bikes' scheme in Galway, cannot be used to promote unhealthy products.
- Redevelop traditional right of way from Headford Road into Castlelawn Heights and link to the Dyke Road cycle ramp.
- Carry out road improvement and traffic calming measures on the old Monivea Road from the junction at McGreals to junction at Coynes.
- Enforcement of speed limits is required in Castlelawn estate.

Health and Well Being:

- Supports Galway City Alcohol Strategy where it applied to public spaces, the retailing of alcohol and associated advertising and the provision of alcohol free venues.
- Ensure the provision of designated alcohol free zones in the city
- Alcohol misuse can only be successfully addressed by effective collaboration between government, health services, other state and voluntary stakeholders
- Details provided on Environmental Health Services role which includes to enforce certain provision of Public Health (Alcohol) Bill 2015
- Minimise the impact of alcohol in Galway City by supporting the implementation of the Galway City Alcohol Strategy to Prevent and Reduce Alcohol-Related Harm.
- Consider under Policy 4.6.1 Open Spaces: Public Realm support for the actions of Galway City Alcohol Strategy to Prevent and Reduce Alcohol-Related Harm regarding;
 - 6a. Identifying and supporting the development of sport, recreation and cultural activities that are free from alcohol.
 - 8b. Limit the availability of alcohol at civic, sporting and public events.
 - 10. Reduce the exposure of children to alcohol marketing in public places.
- Section 4.1 Policy should include the following:
 - Provide Information Signage and promote Slí na Slainte trails.
 - Secure the co-operation of landowners and other stakeholders to open lands for walking and cycling routes.
 - Promote the development of the Outdoor Classroom in natural heritage areas such as forests, woodlands, wetlands, meadows and bogs.

- Insert text to omit kissing gates and other access restrictions on the greenway network as they impeded access.

Parks and Natural Heritage:

- Include under Policy 4.1 Green Network a new policy to prioritise the planting of native trees, flowers and other plants and cease the use of harmful herbicides, pesticides and fungicides by Council.
- Include under Policy 4.1 Green Network a new policy to support and facilitate the planting of wildflower meadows and the setting aside of areas in public parks for wildlife.
- Amend text in Section 4.2.3 Local Biodiversity Sites to include to:
 - *Implement a management plan in Local Biodiversity Sites in order to have them develop as candidates as national heritage areas.*
 - *Work in collaboration with local communities, environmental groups, schools and third level colleges in protecting and enhancing biodiversity, habitats and natural heritage area.*
- Amend text in Policy 4.3 to include to:
 - *Recognise the vital importance of maintaining the integrity of and restoring wetlands, bogs and the floodplains of lakes and rivers as sustainable natural flood defences.*
 - *Compile a map of the floodplains of Galway city and environs for public viewing.*
 - *Implement a policy of hydro-power units along the Corrib and canals giving due cognisance to protecting biodiversity and natural heritage areas.*
 - *Restore the old Waterworks building as a public complex with toilets, café, crafts shops, bike hire, waterways and forestry interpretative centre for the benefit of the Terryland Forest Park, River Corrib and canals.*
 - *Restore Merlin River.*
- Refer to development management plans for all parks, wild flower meadows, wildlife corridors, parks promotion, expansion of parks, wetland restoration, outdoor classrooms in Strategy 4.1.

Maintenance:

- Have maintenance plan for city pavements and ensure maintenance of all city drains.
- Insert a requirement to establish a maintenance hotline/ publicly accessible register for the city in order to allow the community to report maintenance requirements.
- Supports the removal of infill at Old Dock, Longwalk.
- Litter management is a huge issue particularly on Munster Avenue.
- Requests support from City Council in relation to regular sewerage problems in the West, which are not being fixed by Irish Water.
- Need for ongoing financial and government support for maintenance and enhancement of canals, millraces and locks.
- Provide adequate public seating and bins throughout Galway city.
- Seeks the repair and reopening of the sea lock at the Claddagh Basin and facilitate the accommodation of visitor boats.

Other:

- Upgrade buildings on city's derelict property register including Taffes Shop and 25 Quay Street/Quay Lane.
- Consequent to overtures for the removal of amplified busking on Shop Street, designate a specific area for amplified busking.
- Review the Development Contribution Scheme.
- Consultant reports are very costly and should only be requested when absolutely necessary.

- Establish a City Architect Office.
- The costs of proposed coastal protection works at Sailín to Silverstrand outweigh the public benefit.
- Insert under Policy 9.12 Waste Management new policies to support and facilitate home and business waste auditors and consultant, the use of ecological cleaning products, bio-diesel, biodegradable and compostable products, composting, waste segregation, clear signage at waste collection centres, medicine waste, resource recovery park, 'give boxes', rediscovery centre, longer opening hours at Liosban recycling centre, reuse of electronics, hazardous waste collection, repair cafes/men sheds, composting /recycling facilities/system in apartments, bye laws and enforcement of food waste regulations at fast food outlets, litter enforcement, and education campaigns.
- Seeks urgent completion of Headford Road Area LAP.

Appendix A List of those who made Submissions

DDP.17/001	Dun na Mara Residents Association	DDP.17/057	Dept. of Environment, Community and Local Government
DDP.17/002	Thomas Lally	DDP.17/058	Department of Public Health, HSE West.
DDP.17/003	Atlantic Greenway Project.	DDP.17/059	Department of Public Health, HSE West.
DDP.17/004	Kevin & Ann Hurley	DDP.17/060	Kathleen O'Boyle
DDP.17/005	Galway Diocesan Office	DDP.17/061	Galway City Community Network
DDP.17/006	Martina Flaherty	DDP.17/062	Dilis Clare
DDP.17/007	Woodquay Residents Associations	DDP.17/063	Petal Pilley, Director of Blue Teapot Theatre Company
DDP.17/008	James Stewart Ltd.	DDP.17/064	Galway City Partnership
DDP.17/009	Seamus Murphy	DDP.17/065	Aidan Devaney
DDP.17/010	Liam McComiskey	DDP.17/066	Dalata Hotel Group
DDP.17/011	John Kelly	DDP.17/067	Wellpark Retail & Leisure Park
DDP.17/012	Michael Maguire	DDP.17/068	Galway Cycling Campaign
DDP.17/013	Brendan D. Naughton	DDP.17/069	Transport Infrastructure Ireland
DDP.17/014	Matt Lohan	DDP.17/070	Eirgrid
DDP.17/015	Bryan Egan	DDP.17/071	Galway Healthy Cities Forum
DDP.17/016	Brendan McGrath	DDP.17/072	Sigma Retail Partners
DDP.17/017	Henry Bell	DDP.17/073	Galway Healthy Cities Forum, alcohol subgroup.
DDP.17/018	Friends of Merlin Woods	DDP.17/074	Connacht Hospitality Ltd.
DDP.17/019	Christy Kelly	DDP.17/075	Galway Islamic Society
DDP.17/020	Victoria Trust Ltd.	DDP.17/076	OPW
DDP.17/021	Christopher Griffin	DDP.17/077	Irish Water
DDP.17/022	P.J. Clancy	DDP.17/078	Galway Chamber of Commerce
DDP.17/023	Josephine Kelleher	DDP.17/079	Lester Naughton
DDP.17/024	Donagh O'Donoghue	DDP.17/080	James Coyne
DDP.17/025	Evan Molloy & Angela Lawless	DDP.17/081	An Taisce
DDP.17/026	Galway County Council	DDP.17/082	Lidl Ireland
DDP.17/027	Bartley Keane	DDP.17/083	Gerry Fallon
DDP.17/028	Glanvale Court Residents Association	DDP.17/084	Mary Hynes
DDP.17/029	Geraldine O'Reilly	DDP.17/085	Anne Hynes
DDP.17/030	Mary Sheppard	DDP.17/086	Ken O'Sullivan
DDP.17/031	Joan Daveron	DDP.17/087	Luc Desbonnet
DDP.17/032	Anne Rabbitt (Estate of P. Ward)	DDP.17/088	Mary Francis- O'Conghaile
DDP.17/033	John Giblin	DDP.17/089	Cathryn Burke
DDP.17/034	Campaign to restore The Old Dock, Long Walk.	DDP.17/090	Dr. Noel Howard
DDP.17/035	Tom & Christina Devane	DDP.17/091	Edward Hoare
DDP.17/036	Sam Field Corbett	DDP.17/092	ESB
DDP.17/037	Ger O'Farrell	DDP.17/093	Margaret Francis
DDP.17/038	Brian & Phil Langan,	DDP.17/094	Galway's West End Traders
DDP.17/039	Gia Griffiths Howard	DDP.17/095	Dunnes Stores
DDP.17/040	Irish Heart Foundation	DDP.17/096	Tom Connell, DOS- Galway City Council- Housing.
DDP.17/041	Drigin Gaffey	DDP.17/097	EHO Department, HSE West.
DDP.17/042	Don Silke	DDP.17/098	Neil Hughes
DDP.17/043	Don Silke	DDP.17/099	Steven Little on behalf of client
DDP.17/044	Don Silke	DDP.17/100	Muslim Community
DDP.17/045	Kevin Healy	DDP.17/101	Anne O' Hara Quinn
DDP.17/046	Ultan McDonagh	DDP.17/102	Construction Industry Federation
DDP.17/047	Breda Duffy	DDP.17/103	Western Development Commission
DDP.17/048	No name or address supplied	DDP.17/104	Housing and Social Inclusion Sections, Galway City Council
DDP.17/049	Dangan Residents Association	DDP.17/105	Friends of Merlin Park Woods
DDP.17/050	Caroline Burke	DDP.17/106	Royal Horizon Ltd.
DDP.17/051	Caroline Burke	DDP.17/107	Michael Maye
DDP.17/052	Michael Gibbons		
DDP.17/053	Comhairle na nÓg		
DDP.17/054	Digicel Group,		
DDP.17/055	Castlegar N6 Action Group		
DDP.17/056	Galwegian RFC		

DDP.17/108	Access for All	DDP.17/168	Martin Costello
DDP.17/109	James Coyne	DDP.17/169	Maire Swan
DDP.17/110	Engineers Ireland West Region	DDP.17/170	Pat & Bridget Casey
DDP.17/111	Dept. of Education and Skills	DDP.17/171	Mary Walsh
DDP.17/112	GMIT	DDP.17/172	Orla Doyle
DDP.17/113	Comer Group	DDP.17/173	Pat & Ann Madden
DDP.17/114	Fáilte Ireland	DDP.17/174	David & Helen Johnston
DDP.17/115	Anne-Marie, Ernest, Ernie Deacy	DDP.17/175	Thomas Hyes
DDP.17/116	Transition Galway	DDP.17/176	Nano Pyne
DDP.17/117	Dept. Of Arts, Heritage & Gaeltacht	DDP.17/177	Peter Clarke
DDP.17/118	Balmoral Land Galway Ltd.	DDP.17/178	Antoinette Burke
DDP.17/119	Denise Colgan	DDP.17/179	Mary Craddock
DDP.17/120	Barry Smyth	DDP.17/180	Brendan O' Mathúna
DDP.17/121	Trappers Inn	DDP.17/181	Mary & Con Cunnane
DDP.17/122	Udarús na Gaeltachta	DDP.17/182	Patrick Browne
DDP.17/123	Northern & Western Regional Assembly	DDP.17/183	Shiela O'Sullivan
DDP.17/124	Castlelawn Heights and Ros na Si Residents Association Committee	DDP.17/184	Kathleen Cafferky
DDP.17/125	Bowling Green Residents Association	DDP.17/185	PJ Corcoran
DDP.17/126	Tesco Ireland	DDP.17/186	Frank Cryan
DDP.17/127	Connacht Rugby	DDP.17/187	Dr. Eugene Macken, Elizabeth Lawless Macken and Macken Family.
DDP.17/128	Galway Traveller Movement	DDP.17/188	Peggy Costello
DDP.17/129	Proinsias O'Baróid	DDP.17/189	William Grant
DDP.17/130	An Mheitheal Rothar, NUI Galway	DDP.17/190	St. Joseph's Patrician College The Bish) Board of Management
DDP.17/131	Ronan Lawless	DDP.17/191	Tommy Grogan
DDP.17/132	Anne Marie Giblin	DDP.17/192	Terry Fahy
DDP.17/133	National Transport Authority	DDP.17/193	G. Murray
DDP.17/134	James Murphy	DDP.17/194	Resident of no. 27 White Oaks
DDP.17/135	HSE West	DDP.17/195	Gerry O'Murphy and Angela Gordon
DDP.17/136	IDA Ireland	DDP.17/196	E. Loftus
DDP.17/137	Gaillimh le Gaeilge	DDP.17/197	E. Doyle
DDP.17/138	Anne Feeney	DDP.17/198	Resident of no. 51 A White Oaks
DDP.17/139	Lorraine Courtney	DDP.17/199	Bridget McHugh
DDP.17/140	Ethel Balfe	DDP.17/200	John Mara
DDP.17/141	Aishling Hogan	DDP.17/201	Miriam Walsh
DDP.17/142	Christy Kelly	DDP.17/202	Resident of no. 45 White Oaks
DDP.17/143	Catherine McDonnell	DDP.17/203	Olga McMahon
DDP.17/144	John & Evelyn Kenny	DDP.17/204	Anne & Martin Donoghue
DDP.17/145	Pat O'Gorman	DDP.17/205	Agnes Noone
DDP.17/146	Michael O'Donnell	DDP.17/206	Resident of no. 37 White Oaks
DDP.17/147	Tom & Judy Duggan	DDP.17/207	Mary Reidy
DDP.17/148	Concerned Residents of Dangan	DDP.17/208	Mary Kennedy
DDP.17/149	Rachael Farragher	DDP.17/209	Mary Rhatigan
DDP.17/150	Martin Quinn	DDP.17/210	Maura Duigan
DDP.17/151	Joan Casey	DDP.17/211	Seamus Gordon
DDP.17/152	St. Joseph's Patrician College (The Bish) Parents Council	DDP.17/212	Resident of no. 28 White Oaks
DDP.17/153	Ian Burke	DDP.17/213	Mary Conagh
DDP.17/154	Sigma Retail Partners	DDP.17/214	Emma Giligan, Aoife Conway
DDP.17/155	Tom O'Regan	DDP.17/215	DC Higgins
DDP.17/156	T. Turley	DDP.17/216	Geraldine Carroll
DDP.17/157	John Boyle	DDP.17/217	Catriona Collins
DDP.17/158	Micheal & Della Beatty	DDP.17/218	Environmental Protection Agency (EPA)
DDP.17/159	M. Withero	DDP.17/219	John Murphy
DDP.17/160	Mary Hynes	DDP.17/220	Eugene & Mary Lynam
DDP.17/161	Ann Hynes	DDP.17/221	Bridie McCannon
DDP.17/162	Gerard & Mary Cunningham	DDP.17/222	St. John the Apostle NS
DDP.17/163	Mohamed El Heladi	DDP.17/223	Stephen Hosty , Thomas Hosty and Christina Glennon
DDP.17/164	Sean & Shiela Higgins	DDP.17/224	Hillary Wright & Julie Baxtor
DDP.17/165	Conor O'Dwyer	DDP.17/225	Eillen Morris
DDP.17/166	Paddy Cunningham	DDP.17/226	Tolmur Ltd
DDP.17/167	Peter & Eithne Cunningham		

DDP.17/227	Ann & JJ Newell	DDP.17/246	Galway Hospice Foundation
DDP.17/228	Roger O'Sullivan	DDP.17/247	Liam Mellows GAA Club
DDP.17/229	Martin Concannon	DDP.17/248	Highgate Properties Ltd.
DDP.17/230	Breda McGrath	DDP.17/249	Thomas McDonagh Ltd.
DDP.17/231	White Oaks Residents Association	DDP.17/250	Cleverson Ltd.
DDP.17/232	Danielle Maloney	DDP.17/251	Clearwater Ventures Ltd.
DDP.17/233	Michael Tully	DDP.17/252	Joint Receivers - Kieran Wallace and Patrick Horkan
DDP.17/234	Paul Horan	DDP.17/253	Pat Joyce
DDP.17/235	Ross Tobin	DDP.17/254	Rumba Ltd.
DDP.17/236	Florence Thomas and Martin Flaherty	DDP.17/255	Michael Barry, Higgins Motorpark Ltd.
DDP.17/237	Ballindooley Cross Community Cultural and Heritage Project	DDP.17/256	Board of Management of the Mercy Primary School, St. Francis Church and The Mercy Convent
DDP.17/238	Aldi Stores	DDP.17/257	Conker Properties Ltd.
DDP.17/239	James Tierney	DDP.17/258	Galway Hockey Club
DDP.17/240	John Grealish	DDP.17/259	Padraic McHale
DDP.17/241	Mary O'Connor	DDP.17/260	NUIG
DDP.17/242	Joesph Quinn	DDP.17/261	Trean Medow Ltd
DDP.17/243	Whitehall Close Residents Association		
DDP.17/244	Michael Burke, Rebecca Burke, Sean P. Burke		
DDP.17/245	Mattie Burke		

Appendix B List of Prescribed Bodies for consultation

- National Transport Authority, Dún Scéine, Harcourt Lane, Dublin 2
- The Minister for the Environment, Community & Local Government, Department of the Environment, Community & Local Government, Custom House, Dublin 1
- Executive Officer, An Bord Pleanála, 64 Marlborough St., Dublin 1.
- The Minister for Agriculture, Food & the Marine, Department of Agriculture, Food & the Marine, Agriculture House, Kildare St., Dublin 2.
- The Minister for Arts, Heritage, & the Gaeltacht, Department of Arts, Heritage, & the Gaeltacht,
23 Kildare St., Dublin 2.
- The Minister for Communications, Energy & Natural Resources, Department of Communications, Energy & Natural Resources, 29-31 Adelaide Road, Dublin 2
- The Minister for Education & Skills, Department of Education & Skills, Marlborough St, Dublin 1.
- The Minister for Defence, Department of Defence, Station Road, Newbridge, Co. Kildare.
- EirGrid, The Oval, 160 Shelbourne Rd., Dublin
- The Environmental Protection Agency, Johnston Castle Estate, Wexford.
- The Secretary, ESB Head Office, 27 Lower Fitzwilliam St., Dublin 2.
- Environment Unit, Fáilte Ireland, 88-95 Amiens St, Dublin 1.
- Fiona Monaghan, Fáilte Ireland West, Aras Fáilte, Forster Street, Galway.
- Fórfas, Wilton Park House, Wilton Place, Dublin 2.
- Health & Safety Authority, Odeon House, Eyre Sq, Galway.
- Health & Safety Authority, The Metropolitan Building, James Joyce St., Dublin.
- Health Service Executive, Corporate & Public Affairs Department, Merlin Park, Galway.
- H/Q- The Office of Public Works, Jonathon Swift St., Trim, Co. Meath
- The National Roads Authority, St. Martin's House, Waterloo Road, Dublin 4.
- The Minister for Transport, Tourism & Sport, Department of Transport, Tourism & Sport, 44 Kildare St, Dublin 2.
- Aer Rianta International, Shannon Airport, Co. Clare, Ireland
- An Taisce, Tailors Hall, Back Lane, Dublin 8.
- Derrick Hambleton, An Taisce- Galway Association, 26 Manor Ave, Kingston, Galway.
- North & Western Assembly, The Square, Ballaghderreen, Co. Roscommon.
- HQ- Dublin Airport Authority, Dublin Airport, Co. Dublin.
- Galway County Council, Áras an Chontae, Prospect Hill, Galway.
- Planning Notification, Irish Water HQ Offices, Coleville House, 24-26 Talbot St., Dublin 1.
- The Heritage Council, Áras na hOidhreachta, Church Lane, Kilkenny.
- The Inland Fisheries Board, Teach Breac, Earl's Island, Galway.

Appendix 3 Overview of Public Consultation

The Draft consultation period commenced on the Monday 14th December 2015 and ran for a period of 12 weeks up to Friday 11th March 2016.

The Draft Development Plan was placed on public display at the planning office, libraries, Knocknacarra Community Centre, Renmore Sports Centre, the Cumasu Centre, Doughiska and on the Council's website. It was also sent to all the prescribed bodies.

To inform the public, advertisements were placed in local newspapers, local radio and on the Council's website, facebook and twitter, inviting written submissions/observations from the public and interested parties. A press release giving information on the Development Plan was circulated to local newspapers.

Galway City Draft Development Plan 2017-2023			
Public Information Sessions			
Tuesday	26 th Jan	Westside Library	4pm – 8pm
Wednesday	27 th Jan	Menlo Park Hotel	4pm – 8pm
Thursday	28 th Jan	Connacht Hotel	4pm – 8pm
Wednesday	3 rd Feb	Knocknacarra Community Centre	4pm – 8pm
Thursday	4 th Feb	Eyre Square Shopping Centre	1pm – 5pm

Public Consultation Sessions were organised throughout the City to facilitate the public and to maximise the dissemination of the Draft Plan in order to encourage participation. Visual displays which were highly accessible and user friendly were also exhibited. This format included for opportunities for anyone who attended to discuss issues directly with planning staff that were in attendance for the entire display duration. The sessions demonstrated that the nature of issues raised by attendees was similar to the issues raised in the written submissions.



In addition, to broaden the opportunities for public consultation a **weekly drop-in clinic** with planning officials was made available in City Hall. This also provided information on the Draft Development Plan and assistance in making submissions where needed. Throughout the consultation period information and advice was also available from the general planning office.

Written Submissions

A total of 261 written submissions were received. Appendix A lists all those persons /bodies that made written submissions. All submissions have been considered as part of the report. To facilitate full knowledge of the submissions a digital copy has been distributed to all the Council Members. In addition for the benefit of access, all submissions are available to view on www.galwaycity.ie and at the Planning Office.

