



Galway City Community Network

Galway City Development Plan

Submission

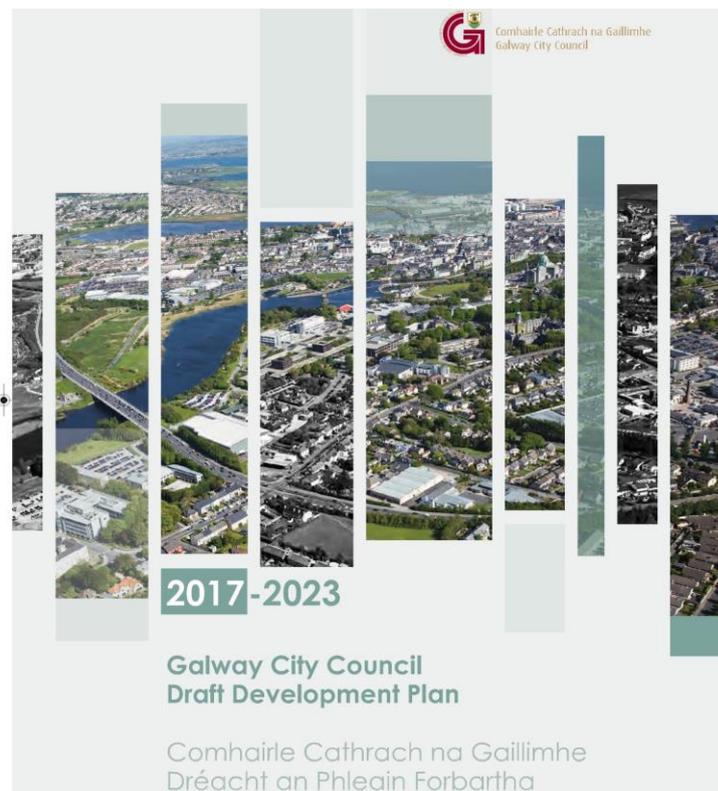


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Galway City Community Network is the Public Participation Network in Galway. We welcome the opportunity to make a submission on the draft Galway City Community Network and hope that our observations make a useful contribution to the final City Development Plan.

Process

In developing this submission, Galway City Community Network (GCCN) undertook the following:

- Communication to members about the importance of the plan and encouraging members to engage both from the perspective of their own groups/organisations/communities and from the collective perspective of the PPN;
- A Brief outlining the draft plan and including a hierarchy of planning in Ireland;
- An initial workshop for all members, organised under the joint auspices of the Linkage Groups;
- A meeting of the following Linkage Groups:
 - Social Inclusion Linkage Group;
 - Arts & Culture Linkage Group;
 - Transportation and Planning Linkage Group;
 - Environment, Recreation and Amenity Linkage Group
 - Housing and Accommodation Linkage Group
- Development of a draft that was circulated to all GCCN members for comment;
- A further joint Linkage Group meeting at which the outcomes of the workshops/meetings/consultations were discussed.
- Discussion by the GCCN Secretariat;
- Circulation of final draft to all GCCN members;
- Presentation, discussion and unanimous endorsement by the GCCN Plenary meeting on March 8th.

In undertaking this process, GCCN seeks to ensure that the submission reflects the experience, expertise and commitment of the community, voluntary and environmental sectors in Galway City to achieving the vision for Galway City as a successful, sustainable, competitive, regional centre that creates prosperity, supports a high quality of life and maintains its distinctive identity and supports a rich cultural experience. A city that is environmentally responsible and resilient to challenge. A city that can attract and retain talent and skills and fosters innovation and creativity. An inclusive city where civic engagement is valued and a shared vision is pursued through good governance and leadership. A city that offers sustainable choices in housing, work, transport and lifestyle opportunities.

Overarching Points

GCCN notes that there is no mention of Galway City Community Network, the Public Participation Network in Galway City. We would urge inclusion of the PPN to be made as a core element of civil society in Galway and a key partner in many of the planned activities. We would encourage specific reference in Policy 7.4 Inclusive City.

GCCN would like to see the public sector duty obligations under the Irish Human Rights and Equality Commission Act 2014 made explicit and would welcome a statement to the effect that these underpin the Galway City Development Plan.

GCCN would welcome a statement to the fact that the principles of equality, sustainability and accessibility will underpin the Galway City Development Plan.

GCCN acknowledges the importance of the terms *citizen* and *citizenship*. However, there are members of communities resident in Galway that do not have Irish citizenship and we urge that the terms are not used to exclude any person, group or community. We would welcome a reference to the term that states that the term is understood in a way that includes all residents of Galway city.

The imagery contained in the draft City Development Plan needs to reflect the diversity of its people and communities. Images can be made available if required.

GCCN would welcome explicit reference to a plan to monitor and review implementation the Galway City Development Plan 2017-2023 that includes consultation with stakeholders. In particular, in this instance, Galway City Community Network, the Public Participation Network in Galway city.

Section 1 Introduction and Core Strategy

Section 1.4 1.4 Core Strategy - Galway City

It is the GCCN view that the road network in the Ardaun area makes it unsuitable for residential development.

GCCN recommends the inclusion of the following policy:

Designated development centres (such as Ardaun) which are beyond the six-year horizon of a LAP/DP should not be zoned but identified as 'Future Development Lands/Strategic Landbank' based on their location, potential transport connections, availability of services, absence of environmental constraints. It is not envisaged that Ardaun could be developed now and should be set out as a longer term objective so as not to delay any transport and present day housing needs projects.

Section 1.7 Employment Land

GCCN recommends the inclusion of a section stating:

Galway City Council will consider land or zone swaps between the east and west of the city to ensure better balance between economic development and residential development.

Chapter 2 Housing and Sustainable Neighbourhoods

General Observations

1. In general, while the content of Chapter 2 is ambitious and contains worthy aims, there is a concern that it is not realistic. The plan is lacking in detail on how the measures contained will be implemented and evaluated. Further detail is also required on how there will be ongoing communication with and feedback to stakeholders. We recommend annual reviews to monitor implementation.
2. The issue of housing for older people and the provision of sheltered housing needs greater attention, in particular the ongoing maintenance of property and the provision of necessary support services.
3. Attention needs to be given to the maintenance of current local authority housing stock and void management. Given the low level of housing stock coming online, it is critical that the maximum use is derived from existing stock. Cyclical maintenance programs and the existence of a sinking fund should be considered.
4. The growth in homelessness is not acknowledged in the plan. There needs to be a short term response.
5. Delivering additional student accommodation can help free up capacity in the private rented sector and therefore needs to be explicitly supported in the Galway City Development Plan.
6. The Scheme of Allocations needs to be revisited, including an examination of refusal policy and how it is implemented.
7. Housing Assistance Payment is a key plank of the Social Housing Strategy and an effectively functioning standards and inspections regime will be critical. These need to be explicitly mentioned.
8. GCCN would welcome an explicit commitment to the principles of universal access and whole-of-life design.

Specific Observations & Recommendations

Section 2.1 Aim, Context and Strategy

GCCN would recommend the inclusion of the following:

Galway City Council will address the challenges in housing and accommodation in a holistic perspective that places the resident at the centre and is underpinned by a life-cycle approach, including ensuring adequate amenities for children and young people.

Section 2.3 Traveller Accommodation

- GCCN welcomes the commitment to facilitate the specific accommodation needs to Travellers.
- GCCN would welcome an explicit commitment to the provision of culturally appropriate accommodation for the Traveller community.
- GCCN would also welcome a commitment to an independent review needs to be conducted into the failure of the Traveller Accommodation Programme to meet its targets.

- GCCN would welcome a firm commitment to facilitate the meaningful participation of the Traveller community in decision-making as being key to effective delivery of the Traveller Accommodation Programme.

Section: 2.4 Neighbourhood Concept

Current wording:

An essential element of urban sustainability is the development of a compact city, which is characterised by the consolidation of existing neighbourhoods and the establishment of new neighbourhoods. Neighbourhoods are areas where an efficient use of land, effective integration in the provision of physical and social infrastructure and high quality design are combined to create places where people wish to live, have a sense of belonging and feel socially inclusive. Sustainable neighbourhoods can contribute to fostering community spirit, to reducing traffic movements and to the provision of high quality residential environments. They can also contribute to reducing greenhouse gas emissions through reduced travel demand, provision of sustainable transport networks and through SUDs and through improvements to energy efficiency in residential design. It is the policy of the Council to promote this neighbourhood concept in existing residential areas and in new developments.

Observation

The acknowledgement that properly conceived neighbourhoods can result in reduced traffic movements is welcome. However, there is no clear statement that traffic movements, particularly through-traffic that has no business in the area, is a threat to the community and a barrier to neighbourhood creation. Examples are car-based commuters using neighbourhood roads as so called “rat runs” to avoid traffic queues on main roads.

GCCN recommends the inclusion of a section stating that:

The elimination of through-traffic will be a central component of the neighbourhood policy. The city council will take steps to protect neighbourhoods by excluding through traffic such as through using selective road closures and traffic cells.

Section: 2.5 Neighbourhoods: Outer Suburbs - Paragraph title: Redevelopment (page 30)

Current wording

In the interest of protecting the amenity of existing residential neighbourhoods in the outer suburbs demolition of existing dwellings for higher density apartment development will not be acceptable. Exception to this policy will only be considered on recently zoned residential lands, undeveloped lands where no pattern of development has been established, on main distributor roads where mixed uses have already been developed and where the existing form of development is not predominantly conventional housing and where the development will not reduce the existing residential amenity.

GCCN recommends the inclusion of additional sentences:

Infill development will not be permitted on alignments that might form obvious access corridors and school routes for pedestrians and cyclists.

Section: 2.6 Neighbourhoods: Established Suburbs 3rd and 4th Paragraph:

Current wording

Demolition of existing dwellings for higher density apartment development in the established suburbs will not be acceptable. Exceptions to this policy will only be considered on recently zoned residential lands, undeveloped lands where no pattern of development has been established, or on main distributor roads where mixed uses have already been developed, or where the existing form of development is not predominantly conventional housing and where the development will not reduce the existing residential amenity.

Demolition of existing dwellings for replacement dwellings will not be acceptable in the established suburbs except in cases where it is demonstrated that the proposed development would make a positive contribution to the area's urban design and where it does not represent a major intervention into or redevelopment of the urban fabric. This assessment will be balanced with the contribution that any proposed replacement would make to enhance the character of the area and will have regard to any sustainable benefits of such development. Where replacement is acceptable, new development will be required to comply with the Council's development standards.

GCCN recommends the inclusion of additional sentence:

Infill development will not be permitted on alignments that might form obvious access corridors and school routes for pedestrians and cyclists.

Section: 2.7 Neighbourhoods: Inner Residential Areas Paragraph title: Redevelopment

Current wording

Demolition of existing dwellings for higher density development will not be acceptable in the inner residential areas except in cases where it is demonstrated that the proposed development would make a positive contribution to the area's urban design and where it does not represent a major intervention into or redevelopment of the urban fabric. This assessment will be balanced with the contribution that any proposed replacement would make to enhancing the character of the area and will have regard to any sustainable benefits of such development. Where replacement is acceptable, new development will be required to comply with the Council's development standards.

GCCN recommends the inclusion of additional sentence:

Infill development will not be permitted on alignments that might form obvious access corridors and school routes for pedestrians and cyclists.

Section: 2.10 Village Envelopes/Areas

Observation

This section refers to a number of village settlements within the city boundary such as Menlough, Castlegar, Coolagh-Briarhill and Coolagh-Menlough.

GCCN recommends the inclusion of a section stating that:

The amenity of these villages is threatened by through-traffic such as car-based commuters using village roads as so called “rat runs” to avoid traffic queues on main roads. The city council will take steps to preserve the character of these places by excluding through traffic such as using selective road closures, traffic cells and restoring historical road-widths. See also section on preserving boreens and country lanes.

Section 2.12 Specific Objectives

GCCN recommends the inclusion of the following:

- Galway City Council commits to supporting sustainable citizen initiatives such as Housing Cooperatives, Community Land Trusts, Co-Housing, and off-grid developments.
- Support research in new forms of Sustainable Housing by organising open architect competitions.
- Create a public Architectural Database concerning all aspects of Galway City Development and its urban structure: history, archaeology, morphology, housing typology.
- All planning should be carried out in consultation with residents.

Section 3 Transportation

General

- Improving the before/after school transportation choices of students by introducing subsidized mini-buses and low-cost bus fares will not only lift some of the financial burden and time pressure from families but also enhances the safety of students, promotes bus travel and overall educational outcomes.
- Similarly, fares to school children aged between the ages of 16 and 18 should be reduced from their current levels, which are 30-40% more expensive than child fares. This is to say that the current child fares which operate on the Leap Card basis should be extended from the current upper age limit of 15 years of age to 18 years of age. Moreover, information on how families can obtain Leap card bus fares should be widely disseminated so that students can avail of such fares and discounts. Further, such measures would eliminate or at least reduce the prevalence of single occupancy vehicles out of school day traffic, which would alleviate road congestion, parking pressures, pollution and accidents.

Section 3.1 Aim, Context and Strategy

GCCN recommends the inclusion of a new bullet point:

- 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 (**Strategy** section of City Development Plan 2011 – 2017, Page 27).

Section 3.4 Cycling and Walking

GCCN recommends the inclusion of a new paragraph into Walking section of Cycling and Walking

The council will 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.

GCCN recommends the replacement of the current bullet point text:

- *Promote and facilitate the extension of the Public Bike Scheme across the city*

Replace with

- **Promote and facilitate the extension of the Public Bike Scheme across the city. Implement the recommendations of the Jacobs Report (2011) by implementing two-way access to cyclists on one-way streets**

GCCN recommends the replacement of the current bullet point text:

- *Support the concept of Smarter Streetscapes through prioritising the needs of pedestrians in the city centre, provision of wider footpaths, shared streets and by extending pedestrianisation*

Replace with

- **Support the concept of Smarter Streetscapes through prioritising the needs of pedestrians in the city centre, provision of wider footpaths and shared streets. Shared streets will be favoured over further pedestrianisation in order to facilitate other vulnerable road users such as cyclists**

GCCN recommends the replacement of the current bullet point text:

- *Promote and facilitate maximum connectivity and permeability for pedestrians and cyclists in the design of new developments in accordance with the Design Manual for Urban Roads and Streets (2013) and best practice guides*

Replace with

- **Promote and facilitate maximum connectivity and permeability for pedestrians and cyclists in the design of new developments in accordance with the Design Manual for Urban Roads and Streets (2013) and best practice guides. Undertake a 'retrofit improvement scheme' of older developments in order to provide maximum connectivity and permeability for pedestrians and cyclists**

GCCN recommends the replacement of the current bullet point text:

- *Support and promote initiatives such as Park and Stride, Green Schools Programme and the concept of having safe routes to school*

Replace with

- **Support and promote initiatives such as Park and Stride, Green Schools Programme and undertake a 'safe routes to school' programme of works**

GCCN recommends the addition of a new bullet point:

- **Install Advance Stop Lines (ASL) of adequate size (5m depth) at every junction throughout the city and undertake to increase driver awareness of ASLs**

GCCN recommends the addition of a new bullet point:

- **Establish a maintenance hotline/register for the city in order to allow the community to report maintenance requirements. The register will be publicly accessible**

Section 3.5 Public Transport

GCCN welcomes the commitment of Galway City Council to light rail. Until such time as this becomes a reality. GCCN would encourage an emphasis on the development of accessible, affordable modes of public transport.

GCCN recommends the replacement of the current bullet point text:

- *Support Rapid Transit Routes with crossover interchange points linking major settlement and employment centres*

Replace with

- **Support Rapid Transit Routes (Rapid Transit being defined in terms of service frequency rather than vehicular speed) with crossover interchange points linking major settlement and employment centres**

GCCN recommends the addition of a new bullet point:

- **Investigate installation of bus lanes on Quincentenary Bridge in order to promote a frequent, cross city bus service that does not serve Eyre Square**

GCCN recommends the addition of a new bullet point:

- **Advocate for changes to LEAP card structure to allow for single trip bus transfers**

Section 3.6 Road and Street Network and Accessibility

GCCN recommends the replacement of the current bullet point text:

- *Consider the introduction of reduced speed limits in the city centre and residential areas of the city*

Replace with

- **Implement low speed zones of 30km/h as the default for the city centre, residential and non-arterial urban roads. The council will seek to develop a pilot scheme, to operate speed cameras within the 30km/h zones**

GCCN recommends the addition of a new bullet point:

- **Ensure that children are given better conditions for walking, cycling and accessing public transport for the entire journey from home to school. This can best be achieved by implementing low speed zones of 30km/h as the default for residential and non-arterial urban roads, which also includes streets in the vicinity of schools. The emphasis needs to be on community-wide road safety for children, facilitating active travel not just in and around residential estates, but also between residential areas and schools.**

GCCN recommends the addition of a new bullet point:

- **Introduce speed monitoring measures, such as section control, on all arterial routes to ensure maximum compliance with the 50 km/h speed limit**

GCCN recommends the addition of a new bullet point:

- **Initiate a 'road works improvement scheme' to significantly redesign Galway's current infrastructure in order to create a pedestrian, cyclist, child and disability friendly Galway city**

GCCN recommends the addition of a new bullet point:

- **Implement a city based 'Golden Mile' programme and encourage local groups to participate**

Section 3.7 Mobility Management and Parking

GCCN recommends the replacement of the current bullet point text:

- *Include measures for traffic calming in the design and layout of new residential developments*

Replace with

- **Include measures for traffic calming in the design and layout of new residential developments. Undertake a 'retrofit improvement scheme' of older developments in order to implement traffic calming**

GCCN recommends the addition of a new bullet point:

- **Decrease the number of on-street car parking spaces in the city by 5% per year of the Development Plan. On-street parking results in increased traffic and less road and footpath space, hindering the movement of pedestrians, cyclists and motor vehicles. Convert a percentage of the removed on-street car parking spaces to disabled bays, bicycle parking and alternative use**

GCCN recommends the addition of a new bullet point:

- **Develop a speed management strategy for Galway city. Strategy will be underpinned by regular audits and surveys of free traffic speeds which will be published and used to identify appropriate remedial action**

GCCN recommends the addition of a new bullet point:

- **Develop a Heavy Goods Vehicle (HGV) Management Strategy with a view to restricting HGV movement to designated roads at designated times**

Section 3.9 Specific Objectives - General (Page 45)

GCCN recommends the replacement of the current bullet point text:

- *Develop a Freight Management Strategy for the city*

Replace with

- **Develop a Freight Management Strategy for the city with a view to restricting freight movement to designated roads at designated times**

Section 3.9 Specific Objectives - Public Transport (Page 46)

GCCN recommends the replacement of the current bullet point text:

- *Provide bus shelters on all routes within the city centre capable of incorporating future integrated ticketing and future real-time scheduling*

Replace with

- **In conjunction with all stakeholders, provide bus shelters along all city routes. Ensure that all stops where a city bus terminates are provided with bus shelters and real-time scheduling**

GCCN recommends the addition of a new bullet point:

- Facilitate the provision of public transport and sustainable transportation facilities (**Public Transport** section of City Development Plan 2011 – 2017, Page 34)

Section 3.9 Specific Objectives - Cycling (Page 47)

GCCN recommends the replacement of the current bullet point text:

- *Improve cycling infrastructure in the city through the shared use of bus lanes, increased provision of cycleways and cycle parking facilities*

Replace with

- **Improve cycling infrastructure in the city through the Hierarchy of Solutions in the National Cycle Policy Framework**

GCCN recommends the replacement of the current bullet point text:

- *Provide cycle parking facilities at appropriate locations including the City Centre, District Centres, Neighbourhood Centres, schools, beaches, cemeteries and parks*

Replace with

- **Provide cycle parking facilities throughout the city to cater for 20% of commuters arriving by bicycle at a minimum.**

GCCN recommends the addition of a new bullet point:

- **Implement two-way exemptions for cyclists on one-way streets as a matter of priority, to facilitate the Public Bike Scheme and to maximise permeability in accordance with national policy (“Implement two-way access to cyclists on one-way streets where feasible” from Cycling section of City Development Plan 2011 – 2017, Page 35)**

GCCN recommends the addition of a new bullet point:

- **The council recognises that one-way streets and one-way street systems encourage speeding and increase traffic danger and severance for pedestrians and cyclists. The city council will work to remove one-way streets and discourage the use of one-way systems within private developments**

GCCN recommends the addition of a new bullet point:

- **Develop the established network of walking and cycling routes linking key destinations to encourage more active commuting and leisure trips**

GCCN recommends the addition of a new bullet point:

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

GCCN recommends the addition of a new bullet point:

- **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 (From Cycling section of City Development Plan 2011 – 2017, Page 35)**

GCCN recommends the addition of a new bullet point:

- **The council specifically acknowledges Policy Objective 2.6 of the National Cycle Policy Framework that traffic calming schemes based on road narrowings, such as the traffic islands on the Headford Road, are cyclist unfriendly and require remedial works. For the purpose of prioritising such remedial works, the council will conduct and publish an audit of all traffic islands and other similar features creating such pinch points forcing cyclists and motorised traffic into close proximity**

GCCN recommends the addition of a new bullet point:

- **Pilot shared use road markings as recommended by the National Cycle Policy Framework. Erect signage at roundabouts and pinch points advising motorists to yield to cyclists in possession of the junction or the road**

GCCN recommends the addition of a new bullet point:

- **Ensure detection sensors at all junctions in the city recognise bicycles**

GCCN recommends the addition of a new bullet point:

- **In residential developments, a minimum of one cycle parking space per residence shall be provided for visitors. Cycle parking will be provided within the residential units or the associated curtilage and match the predicted occupancies for each residential unit. Cycle parking must be sheltered**

GCCN recommends the addition of a new bullet point:

- **A minimum provision of four bicycle parking spaces will apply after which spaces will be provided sufficient for 1:5 of the employees. Staff cycle parking should be indoors or sheltered. A minimum of four visitor/customer cycle parking spaces shall be provided at each entrance to all developments. Where a development consists of separate units for retail or other purposes a minimum provision of four visitor/customer cycle parking spaces serving each entrance of each unit will apply. Where visitor/customer car parking is provided, additional cycle parking spaces shall be provided at a level not less than 20% of the number of car parking spaces provided. Where car parking is provided cycle parking shall be provided closer to any entrances than any car parking other than disabled car parking**

GCCN recommends the addition of a new bullet point:

- **Visitor cycle parking should be adjacent to entrances and where feasible, visible from within the unit being served. Cycle parking must permit the locking of the frame using a**

standard U-lock, cycle parking designs based on wheel slots/clamps are not appropriate and will not be accepted in fulfilment of this standard

GCCN recommends the **removal** of the following bullet point:

- *Provide motorcycle parking facilities at appropriate locations in the city*

Section 3.9 Specific Objectives - Pedestrian (Page 47)

GCCN recommends the replacement of the current bullet point text:

- *Improve pedestrian linkage from residential neighbourhoods to bus stops*

Replace with

- **Conduct a permeability audit in order to improve pedestrian linkage from residential neighbourhoods to bus stops, neighbourhood centres, schools, places of employment and other desired locations**

GCCN recommends the addition of a new bullet point:

- **Pilot the provision of zebra crossings and associated traffic calming at all city roundabouts**

GCCN recommends the addition of a new bullet point:

- **Develop the established network of walking and cycling routes linking key destinations to encourage more active commuting and leisure trips**

GCCN recommends the addition of a new bullet point:

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

GCCN recommends the addition of a new bullet point:

- **Conduct a review of all pedestrian crossing signals in the city. Use the review to reduce waiting time for signal, increase the length of 'green man' time and to remove crossing signal completely and replace with zebra crossing when deemed necessary**

GCCN recommends the addition of a new bullet point:

- **Conduct a review of all kerb radii (side road curvature) in the city. Use the review to reduce excessive kerb radii in order to provide for greater pedestrian safety**

Section 3.9 Specific Objectives Road and Street Network (Page 48)

GCCN recommends the replacement of the current bullet point text:

- *Continue widening and improvements on Coolagh Road, Quarry Road and Monument Road*

Replace with

- **The Development Plan recognises that the city is surrounded by a network of boreens and country lanes that, where lightly trafficked, are already a resource for walkers and cyclists. Facilitate the preservation of the 'country lane' nature of these roads by preserving the narrow widths and irregular alignments and taking steps to discourage**

through traffic and rat running. The city council will work with the county council to preserve the boreens and develop them as a both a sustainable transport and recreational resource for the city. Wherever possible, links will be provided between the boreen network and the existing road network. The council will compile an inventory of boreens and draft an action plan to preserve or restore their essential character

GCCN recommends the addition of a new bullet point:

- **Implement strategic road closures to motorised traffic to prevent rat-running and provide safe neighbourhood routes. Ensure road closures do not hinder the progress of pedestrians and cyclists**

GCCN recommends the addition of a new bullet point:

- **The Council recognises the difficulties posed by roundabouts for cyclists and pedestrians and is committed to addressing this issue by taking whatever appropriate steps as are necessary (City Development Plan 2011 – 2017, Page 33)**

GCCN recommends the addition of a new bullet point:

- **Implement junction upgrades at the Deane Roundabout to provide for pedestrian and cycle movement and to facilitate public transport**

GCCN recommends the addition of a new bullet point:

- **Implement junction upgrades at the Skerritt Roundabout to provide for pedestrian and cycle movement and to facilitate public transport**

GCCN recommends the addition of a new bullet point:

- **Implement junction upgrades at the Martin Roundabout to provide for pedestrian and cycle movement and to facilitate public transport**

GCCN recommends the addition of a new bullet point:

- **Implement junction upgrades at the Joyce Roundabout to provide for pedestrian and cycle movement and to facilitate public transport**

GCCN recommends the **removal** of the following bullet point:

- **Facilitate a new access to Merlin Park Hospital from the Dublin Road at Galway Crystal**

Replace with

The current entrance will be moved approx. 50 metres so that the South Woods or South Meadows, both of which are of high value in terms of biodiversity and amenity, are protected.

GCCN recommends the **removal** of the following bullet point:

- **Implement road widening and improvements at Bothar na gCoiste**

Section 4 Natural Heritage, Recreation and Amenity

Section 4.1 Context

GCCN recommends the following:

Insert into the second paragraph, third last sentence ***Galway city Habitats Inventory 2006.*** (Page 51)

GCCN recommends the addition of the following for the section on Strategy (Page 51)

- 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*.

GCCN recommends following for Table 4.2 - Hierarchy of open spaces (Page 53).

- GCCN recommends the addition of ***Barna River, Merlin River, Terryland/Sandy River and Ballindooley Lough*** in the first column of the Rivers and Waterways section
- In Residential Open Space, add on to first sentence in third column ***as well as for all abilities.***
- In Agricultural Lands & High Amenity, add on to second column ***Castlegar, Ballindooley, Dyke Road, Merlin, Menlo, Circular Road***

GCCN recommends the following for Section 4.1 Policy (Page 54)

- Paragraph 6, include sentence: ***Provide Information Signage and promote Slí na Slainte trails.***
- Paragraph 13, add on in order ***to protect and enhance biodiversity.***
- Insert new paragraphs
 - ***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.***

GCCN recommends the following for Section 4.2.3 Local Biodiversity Sites (Page 57)

- Insert new paragraph (before Table 4.3)– ***Implement a management plan in Local Biodiversity Sites in order to have them develop as candidates as national heritage areas.***
- Move ***Terryland Forest Park*** from Table 4.4 to Table 4.3.
- Include new paragraph (bottom of Page 57):

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.

Work in collaboration with local communities, environmental groups, schools and third level colleges in protecting and enhancing biodiversity, habitats and natural heritage area.

GCCN recommends the following for Section 4.3. Policy (Page 61)

Insert new paragraphs:

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.

GCCN recommends the following:

In first paragraph, fourth sentence include after trees and before hedgerows ***boreens, traditional drystone walls.***

4.4.1 Green Spaces, Urban Woodlands - add at the end of last paragraph ...***hedgerows and traditional drystone walls.***

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 new paragraph between paragraph one and two

Consideration is given to developing Castlegar Mass Path, boreen to the left of the entrance to Menlo Castl, Carrowbrowne Bog Road and what is known as the Seven Galway Castles Heritage Way as trails for the benefit of leisure cycling and walking.

GCCN recommends the replacement of the current title

Section 4.5.1 Greenways and Public Rights of Way

Replace with

Section 4.5.1 Greenways, Public Rights of Way and Boreens

GCCN recommends the insertion of a section recognising the existence of boreens and the need to preserve them as country lanes. New section: Boreens and country lanes:

The council recognises that the city is surrounded by a network of boreens and country lanes that, where lightly trafficked, are already a resource for walkers and cyclists. The council will work to preserve the “country lane” nature of these roads by preserving the narrow widths and irregular alignments and taking steps to discourage through traffic and rat running. The city council will work with the county council to preserve the

boreens and develop them as a both a sustainable transport and recreational resource for the city. Where ever possible, links will be provided between the boreen network and the greenway network. Where bounded by hedgerows, the boreens also represent a significant habitat in their own right. The council will compile an inventory of boreens and draft an action plan to preserve or restore their essential character (Submission source: Galway City Community Forum Submission on City Dev Plan 2011-2017)

GCCN recommends the insertion of a section on Kissing gates and access controls. New section:

The council recognises that the amenity and value of the greenway network is reduced by the presence of access controls such as kissing gates. The council recognises that a properly conceived greenway network does not impose a need for manual handling on the users. The council will remove all kissing gates where found on the greenway network. Access restrictions to the Greenway network will only be imposed in response to identified need and will always be of a design that allows free transition for wheelchair users and cyclists particularly those with child trailers and child seats. (Submission source: Galway City Community Forum Submission on City Dev Plan 2011-2017).¹

GCCN recommends that Table 4.3 on Page 38 *Greenways and Public Rights of Way* is renamed to match section **Greenways, Public Rights of Way and Boreens**

GCCN recommends the replacement of the current bullet point text:

- *Continue to develop and improve the greenway network in the city, providing alternative accessible circulation routes for pedestrians and cyclists, for the enjoyment and recreational use by the entire community.*

Replace with

- **Continue to develop, improve and integrate, the boreen and greenway networks in the city, providing complementary accessible circulation routes for pedestrians and cyclists, for the enjoyment and recreational use by the entire community².**

GCCN recommends the replacement of the current bullet point text:

- *Develop a strategic citywide coastal greenway from east to west linking with riverside walkways having due regard to nature conservation considerations.*

Replace with (links to neighbourhoods)

- **Develop a strategic citywide coastal greenway from east to west linking with riverside walkways and adjacent neighbourhoods having due regard to nature conservation considerations.**

¹ **Reason:** The current kissing gates require users including children to dismount and manhandle their bicycles around or over the obstacle.

² **Reason for change:** Include boreens, the greenways are not an “alternative” to making sure that the roads are fit for cycling particularly faster cyclists who should not feel directed to use spaces shared with pedestrians. (See also code of conduct)

GCCN recommends the addition of new bullet points:

- **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.**
- **Preserve a corridor through the docklands and harbour area for the proposed coastal greenway.**

Section 4.5.2 Child Friendly City

GCCN recommends the insertion of a new sentence

The council recognises that the addition of cycle or pedestrian facilities to main or arterial roads does not of itself render them suitable for unsupervised trips by children of primary school age. 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 journeys³.

Table Policy 4.5.2 – Community Spaces Child Friendly City

GCCN recommends the addition of new bullet points:

Provide children with a network of routes away from main roads

4.5.3 View of Special Amenity Value and Interest (Page 65) - Insert at the end of V.6 and ***Ballinfoile (green) Park.***

4.6.2 Agricultural Lands (Page 67) - Insert new sentence after third paragraph ***Galway City Council will promote the establishment of an educational farm in the Castlegar area to the north of Terryland Forest Park.***

Policy 4.7 Specific objectives

Section: Community Spaces Sub section: Medium/Long term

GCCN recommends the insertion of a new point

Develop adventure playgrounds and outdoor classrooms

GCCN recommends for the 3rd bullet point starting: “Develop a number of greenways within the city including:”

Remove word “walk” and insert “greenway” in the subsequent seven sub points

³ **Reason for change:** Adding cycle facilities to a road requires increased skill from cyclists as the decision making environment has been made more complex. Also if the traffic is of arterial nature a level of experience and understanding of such traffic is still required. Likewise adding cycle facilities may not address other problems eg. Cyclists using the Western distributor road still have to negotiate the roundabouts – the presence of the cycle lanes does not remove this challenge for unsupervised children

GCCN recommends the insertion of a new point

- **The council will compile a list of boreens and adopt an action plan to preserve their country lane nature and develop them as a recreational resource.**

GCCN recommends the replacement of the current bullet point

- *Develop pedestrian and cycle ways at Knocknacarra, Doughiska and Castlegar linking residential with existing and future services and amenities.*

Replace with

- **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 amenities⁴.**

4.7 Green Spaces, Short Term (Page 68) - Insert at the end of first paragraph, ***Merlin Woods, Merlin meadow, Ballinfoile Park and Woodquay plots/old railway embankment.***

In first paragraph on Page 69 after the word tree, insert ***hedgerows and traditional drystone walls.***

Medium/Long Term (Page 69) - In first paragraph insert at the of sentence ***and walking and cycling access in adjacent boreen.***

In fourth paragraph on Page 70, add on after the first sentence - ***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.***

GCCN recommends

The inclusion of a reference to the Terryland Forest Park Committee and a commitment to its revitalisation.

⁴ **Reason for change:** It is not legally possible to include cycleways in existing roads

Section 5 Economic Activities

GCCN would welcome

- A reference to the importance of, and a statement of commitment to, Green Economics;
- The inclusion of a commitment to the development of a seven-day food market;
- A references to the bid to become the European Capital of Gastronomy and the European Youth Capital 2019;
- A reference to the importance of promoting co-operatives and social enterprise;
- The inclusion of the following with regard to young people:
 - In order to promote successful self-employment carrier of the youth who aspire to develop their own business, it is important to make assessment of supportive local authority, statutory and voluntary agencies that are involved in the provision of business and market information to young entrepreneurs. This helps to identify and address any gaps between existing support services and new requirements. It is also necessary to put in place concrete plans for mitigating youth unemployment by emphasizing the need for institutional collaboration and coordination among government, educational institutions (schools, colleges and universities) and employers with the aim of bridging the experience gap. In order to address the education-employment nexus, it is worth exploring internships and apprenticeships opportunities by local private business and voluntary and statutory agencies. The following goals could be used for a targeted output-based youth employment schemes:
 - Skills – increase the number of apprenticeship niches for young people
 - Education – increase the number of young people not in full time education or employment by expanding non-formal education, and vocational skill training with the aim of promoting the technical and professional knowledge of young people as this enhances their career mobility and quality of life

Section 7 Community and Culture

Section 7.2 Creative City

The following are the main points on Section 7.2 Creative City

- GCCN would like to see a broad definition of culture made explicit.
- GCCN welcomes the focus on urban design and the commitment that in order to facilitate the expansion of the arts and culture experience of the city, arts and cultural infrastructure is required to be integrated into regeneration sites within the city; Headford Road, Ceannt Station and the Inner Harbour area. In that context we would suggest that:
 - The Per Cent for Art Scheme needs to be maximised and all investment needs to ensure physical, social and economic accessibility;
 - The planned regeneration projects provide an ideal opportunity to ensure best practice within the framework of the Barcelona Declaration and other relevant legislation;
 - We welcome the fact that will be integrated into the planned regeneration sites but would like to see urban design and integrated arts and culture infrastructure extended to local communities. We would, for example, encourage the development of Creative Hubs in each of the suburbs, prioritising the most disadvantaged communities.
- GCCN would like to see all arts and culture infrastructure *community proofed* so that accessibility for all sectors of the community, particularly those that are socially excluded, marginalised and disadvantaged, is proactively encouraged. We understand that outreach work will be key to this approach.
- The imagery contained in the draft City Development Plan needs to reflect the diversity of arts practice, and not just spectacle which is what is predominantly showcased;
- 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;
- All current and future developments need to be future proofed and build and maintenance need to be on a carbon neutral basis;
- We believe that sustainability should be at the heart of development in Galway City. Increasingly arts, culture and community are being recognised as being integral to environmental sustainability;



GCCN proposes a new bullet point

“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

GCCN proposes an insertion in the following bullet point (No 3, p99):

- “Facilitate and encourage the provision of new and improved arts and culture facilities in the city including in district or neighbourhood centres where appropriate” - insert: **“Cultural facilities to include rehearsal, performance, set building, artists’ studios, storage space and office with broadband”**

GCCN proposes an insertion in the following bullet point (No 16, p99):

- “Support to the establishment of a school of music within the city, in conjunction with all interested bodies” - insert: **...and that a lead agency be appointed to spearhead the development of a School of Music in Galway.**

GCCN welcomes mention of Comerford House as an example of using what we have sensibly rather than reverting to new builds all the time.

GCCN recommends:

- Recognition of the special role of Artists and Artists Groups as cultural ambassadors and their creative influence within the local community by supporting existing Artists initiatives within the Galway City Art plan.
- Support existing Art infrastructure and established organisations providing Studios and Gallery space for Visual Artists such as Artspace Studios, Engage and 126 within the Galway Art plan.
- Support proposed Plan for a Municipal Art Gallery housing dispersed valuable City Collection within the Galway Art Plan.

Section 7.3 Bilingual City

GCCN welcomes the reference to Galway City as a bilingual city and acknowledges the place of the Irish language. However, mention must also be given to the multi-lingual status of Galway city given the diverse nature of the Galway community.

Section 7.4 Inclusive City

GCCN notes that there is particular mention given to the Local Economic and Community Plan throughout. While this is welcome, we believe that it is imperative to reference the fact that the LECP is a *living document*. In that context we believe reference to *supporting actions* should be amended to ***supporting goals and objectives and building on actions***.

GCCN would welcome an explicit commitment to supporting social inclusion in Galway city.

GCCN recommends the replacement of the policy item

Support and promote the various aims of the Council to give effect to the Barcelona Declaration.

Replace with:

Recognising that the Irish State is soon to ratify the United Nations Convention on the Rights of People with Disabilities (UNCRPD), Galway City Council will build on its commitments to the Barcelona Declaration to mainstreaming policy that seeks to encompass the National Disability Strategy Implementation Plan, and the objectives of the UNCRPD within the vision of community development.

Section 7.4.1

The promotion of quality of life involves investment in quality living spaces through urban design, land planning and zoning, and the attendant amenities, and supporting infrastructures by facilitating urban and economic growth. The equally important task of creating sustainable communities also requires the need to foster a sense of community and citizenship through targeted and comprehensive investment in social and communal infrastructure. As such, we believe that the following points do not seem to have sufficiently considered in the Draft City Council Development Plan.

- 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”.

7.4.2 Education

GCCN would welcome efforts to support the establishment of community-based afterschools projects in the most disadvantaged and marginalised areas of the city. In Galway, a model was developed that focused on afterschool as a model for educational intervention and we urge that support is made explicit for this model.

Section 7.4.3 Childcare

GCCN would like to see specific reference to protecting community-based childcare facilities.

Section 8 Built Heritage and Urban Design

Section 8.7 Urban Design

GCCN would welcome greater reference and commitment to accessibility and ensuing a life-cycle approach to urban design.

GCCN would welcome a greater to commitment to public consultation on all large-scale developments.

GCCN would welcome an explicit commitment to open competitive approaches to design to ensure the highest standards.

GCCN would welcome a commitment to providing adequate public seating and bins throughout Galway city.

Section 9 Environment and Infrastructure

Generally, GCCN believes that the language used is not sufficiently definite and we are disappointed to see that Galway City Council have included only one objective. In general, we are recommending that language is strengthened.

GCCN recommends the following amendments to 9.1 Aim:

To secure a high quality, clean and healthy environment, while facilitating the sustainable development of the city, through supporting the continued improvement and expansion of infrastructure services, including for water, drainage, communication, energy and waste management facilities. To ensure that environmental protection is an integral part of the development process within the city, by avoiding potential pollution at source and reducing environmental risks to the city and its community. Address climate change and reduce greenhouse gas emissions by **facilitating, promoting and requiring where legally possible**, energy efficiency energy conservation and renewable energy sources.

GCCN recommends the amendments to 9.1 Context:

Climate change represents **one of the most** significant challenge for society. Future development and investment decisions from national to local level ~~and~~ must incorporate the minimization consideration of future climate ~~change conditions as well as~~ and adaptation options. Important elements of these considerations include flood risk, accommodation of renewable energy sources, energy conservation and improved management of resources. Climate change impacts are predicted to include intense rainfall events with rise in sea levels as well as periods of increased drought. The 2020 EU Effort Sharing Decision commits Ireland to reducing emissions from a number of sectors, including transport and construction sectors, to 20 per cent below 2005 levels. In order to meet the 2020 targets, it is essential that the dependence on fossil fuels is reduced and increases are achieved in the use of alternative energy sources and improvements in energy efficiency.

At national level, there is currently an on-going review of climate change policy which will aid in the transition to a low-carbon, climate resilient, environmentally sustainable economy by 2050. This will be through identifying specific policy measures to ensure compliance with relevant emission reduction obligations. In accordance with the EU objective of reducing greenhouse gas emissions Ireland is developing a National Low-Carbon Roadmap, which will set out the strategy to be employed to meet these targets¹⁴. A National Climate Change Adaptation Framework has been in place since 2012. This provides the policy context for a strategic national adaptation response to climate change ensuring adaptation measures are implemented across different sectors to reduce Ireland's vulnerability to the negative impacts of climate change. A draft Climate Action and Low-Carbon Development Bill 2015 provides for the approval of government plans in relation to climate change for the purpose of pursuing the transition to a low carbon, climate resilient and environmentally sustainable economy by the year 2050. At a local level the policies and objectives of the Development Plan ~~must~~ contribute to the national commitment to reduce greenhouse gas emissions and include climate change adaptation through the ~~ensuring promotion~~ of sustainable development, integrated transport, flood risk management, renewable energy sources and energy conservation.

The policies in this Chapter seek to deliver direct environmental benefits, improve the well-being of the community and lead to a more sustainable environment and to contribute to social, ~~cultural and economic~~ **growth as well as growth in well-being**.

GCCN recommends the amendments to 9.2 Climate Change Resilience:

Sustainability appraisal and climate change considerations are fully integrated into the Strategic Environmental Assessment of this Plan. In the future and subsequent to the publication of national guidelines, ~~it is anticipated that~~ A a-climate change adaptation strategy will be prepared for the city.

GCCN recommends the amendments to 9.4 Renewable Energy

Ireland's National Renewable Energy Action Plan (2010) sets a target of 16% of the national gross final consumption of energy to be from renewable resources by 2020. This is to be achieved by attaining 40% consumption of electricity and 10% of transport energy from renewable sources. In order to achieve these national targets the use of renewable sources of energy generation including wind, hydro, wave/ocean, solar power, geothermal/CHP and biomass must to optimised. National policy recognises that there is a need to transform Ireland's economy from one based on a predominantly imported fossil fuels to a more indigenous low carbon economy centred around energy efficiency, renewable energy and smart networks. Sustained growth in the use of renewable energy resources and improved energy efficiency has associated climate change adaptation benefits. It also has the potential for energy sector job creation, and ensures security, diversity and affordability of energy supply which is crucial for the economy, environment and society. The Council plays a key role in assessing, ~~and permitting, and promoting~~ renewable energy projects and infrastructure in the city. In recognition of the need to reduce the City Council's carbon footprint in line with national climate change policy, the Council have prepared a draft Corporate Energy Management Strategy (2015), which will be followed by an Energy Action Plan for implementation.

GCCN recommends the amendments to 9.5 Sustainable Building Design and Construction

Improved energy efficiency and enhanced thermal and energy performance in existing and new buildings contribute to a reduction in greenhouse gas emissions. The construction or refurbishment of buildings can demonstrate the practical application of such sustainable measures, which include reduction of heat loss by various methods of insulation, solar orientation and passive solar heating. The introduction of new building regulations, Part L 2013, which requires that all new houses are built to a carbon zero, or nearly carbon zero standard, and the growing demand for low energy, low carbon and passive houses increases good building energy performance. The Council will ~~encourage, and where possible require~~ increased energy efficiency and low-carbon living in existing and future residential, commercial and industrial buildings in the city and will lead with initiatives in retrofitting and in the design of social housing.

Sustainable low-energy design is encouraged in buildings, such as building orientation, layout, massing and landform to capitalise on passive solar gain and natural ventilation. The Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009) encourages more energy-efficient housing layouts. This includes for more quantifiable sustainable development standards, maximising access to sunlight and daylight, facilitating greater movement by pedestrians and cyclists, facilitating the use of public transport and the use of efficient energy supply.

GCCN recommends the amendments to Policy 9.5 Sustainable Building Design and Construction

Increase the energy performance of future buildings in the city by encouraging **and where possible requiring** energy efficiency and energy conservation in the design and construction of development.

Require Encourage new development to limit greenhouse gas emissions and make use of opportunities for renewable and low carbon energy including through design, layout, orientation and use of materials.

Require Encourage high standards of energy conservation and improved energy performance in all existing and planned local authority housing.

Liaise with the Galway Energy Agency (GEA) to develop **strict** standards, procedures and targets for energy conservation in the Council's housing stock.

Require Encourage consideration of orientation in the siting, layout, massing, land form and aspect in the design of future housing developments, in order to avail of passive solar gain and natural ventilation.

GCCN recommends the amendments to 9.7 Water Services

IW has plans to replace some of the city's problematic water mains over the next few years in order to reduce the current levels of leakage. Water conservation is a cost effective and sustainable way to limit water demand and increases the efficiency and capacity in the water distribution network to meet existing and future demand. The Council will continue to encourage **and, where possible, require** water conservation initiatives including rainwater harvesting and grey water recycling in developments in liaison with IW as part of the Galway City Water Conservation Stage 3 Works and IW Conservation Strategy.

GCCN recommends the amendments to Policy 9.7 Water Services

Encourage all significant water users to use best practices in water conservation and continue to **require promote** water conservation measures in all new development in the city in liaison with Irish Water.

Section 9.15 Specific Objectives

GCCN believes that this section is totally inadequate and recommends the inclusion of the following:

- Complete a local Climate Change strategy;
- An explicit 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;
- A commitment to benchmarking carbon emissions and monitor reductions;
- A commitment to undertaking the measurement of ecological footprint;
- A commitment to frequent hazardous waste collections;
- A commitment to establish a Resource Recovery Park.