



Galway City Council Draft Development Plan 2023-2029

**Comhairle Cathrach na Gaillimhe
Dréachtphlean Forbartha 2023-2029**

Chief Executive's Report

Tuarascáil an Phríomhfheidhmeannaigh

Development Plan and Policy Section

16th June 2022



**Comhairle Cathrach na Gaillimhe
Galway City Council**



**CATHAIR NA GAILLIMHE
PLEAN FORBARTHA
GALWAY CITY
DEVELOPMENT PLAN**

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Part 1: Introduction to Chief Executive's Report on submissions or observations received on Draft Galway City Development Plan 2023-2029

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 Development Plan consultation, preparation of the Draft Development Plan and consideration and amendment of the Draft Development Plan by the Elected Members. The Draft Development Plan was approved by the Elected Members on January 17th 2022 and this was followed by a period of public display and consultation.

The public consultation process extended from Friday 28th January 2022 to Wednesday 13th April 2022. As part of the process, the Planning Authority was required to publish a newspaper notice to notify the public of the preparation of the Draft Development Plan and to invite written submissions or observations on the Draft Development Plan. This was published on January 27, 2022 in the Galway Advertiser. In addition, the Planning Authority was required to send the Draft Development Plan specifically to the Office of Planning Regulator (OPR), the Northern and Western Regional Assembly (NWRA) and Prescribed Bodies. A total of 230 submissions were received during the consultation period. All submissions have been examined and considered in the preparation of the Chief Executive's (CE) report. Appendix A of this CE Report lists all those persons /bodies that made written submissions and to enable easy access to submissions, it includes for a direct link to each submission. In addition, all submissions are available to view on consult.galwaycity.ie and at the Planning Office.

Overview of Public Consultation on Draft Development Plan

Public consultation on the Draft Galway City Development Plan 2023-2029 extended from Friday 28th January 2022 to Wednesday 13th April 2022, a period of just over 10 weeks.

The Draft Development Plan and all associated documents was made available to view on the Galway City Council website and on the online consultation portal consult.galwaycity.ie. Hard copies of the Draft Development Plan and all associated documents were available to view at the Galway City Council Planning Office and in all city libraries.

Submissions and Observations were facilitated to be made directly onto the online consultation portal consult.galwaycity.ie, by email to devplan@galwaycity.ie or to be sent by post. Hard copies were also made available for purchase for a nominal fee.

To encourage public engagement, advertisements were placed in local newspapers, local radio and on the Council's website. A coordinated social media campaign on Galway City Council's Facebook, Twitter and Instagram accounts notified the public that the Draft Development Plan was on public display, promoted consultation events and weekly clinics and issued reminders in relation to the closing date for submissions. Information was included on how to make a submission. A series of bilingual press releases were circulated to local newspapers during the public consultation period giving information on the Development Plan and inviting written submissions/observations.



Public Drop in Information Sessions

Four Public Drop in Information Sessions were organised at locations in the City. These sessions provided an opportunity for members of the public to discuss issues directly with the development plan team that were in attendance. Visual displays which were highly accessible and user friendly were also exhibited. The sessions demonstrated that the nature of issues raised by attendees were similar to the issues raised in the written submissions.

Weekly clinic

In addition, a weekly clinic in City Hall was facilitated whereby members of the public could have a face to face meeting with the development plan team. This provided an opportunity to discuss particular issues, to provide information on the Draft Development Plan and to provide assistance in making submissions if required. Throughout the consultation period, the development plan team were available to provide information and advice by telephone, email and through on-line meetings.



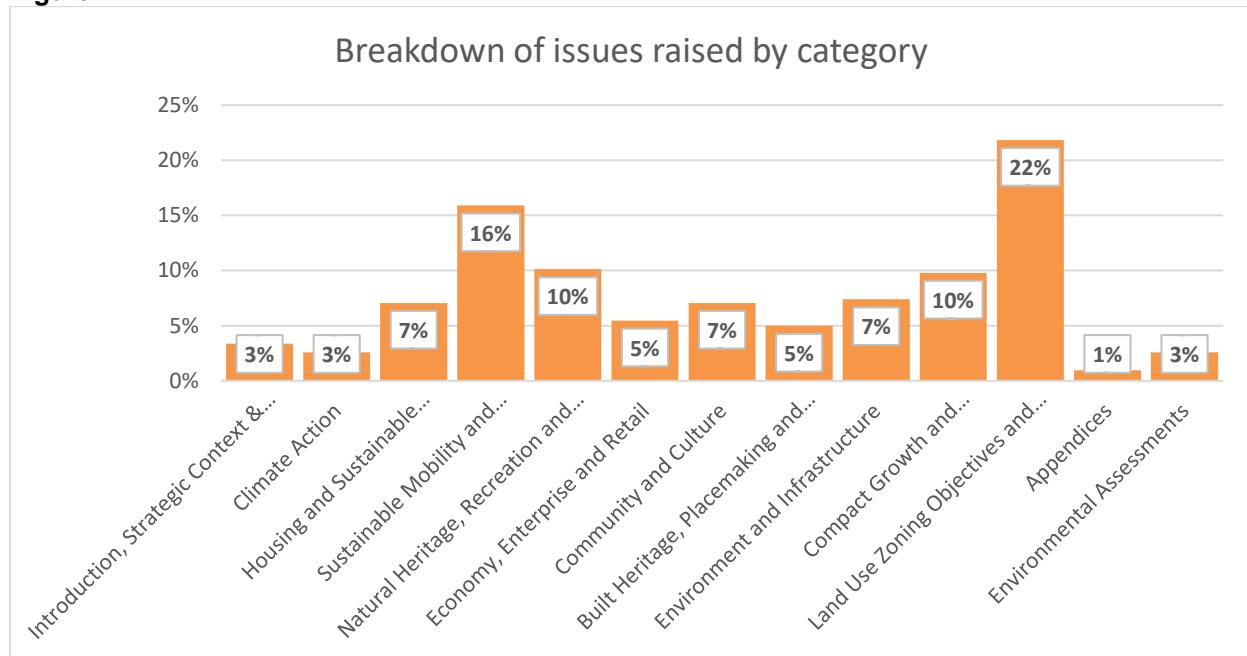
Overview of submissions received

A total of 230 valid submissions were received during the public consultation period. The majority of submissions were received online on the consultation portal or via email.

A list of all persons/bodies that made a submission is included in Appendix A of this document. Individual submissions can be accessed directly from Appendix A by clicking the submission reference number. All submissions are also available to view on consult.galwaycity.ie.

Issues raised in each submission/observation have been summarised under the relevant chapter and are set out in Part 3 of this report together with the responses and recommendations of the Chief Executive. Figure 2 shows a breakdown of issues raised under the relevant chapter/section of the Draft Development Plan. Submissions from the Office of the Planning Regulator (OPR) and the Northern and Western Regional Assembly (NWRA) are considered separately in Part 2 of this report as is required under legislation.

Figure 2



Legislative Context

In accordance with Section 12(4) of the Planning and Development Act 2000 (as amended), following the Draft Development Plan public consultation, the Chief Executive is required to prepare a report for the Elected Members. The Chief Executive's (CE) Report is required to:

- List the persons/bodies who made submissions/observations during the Draft Development Plan consultation period,
- Provide a summary of the recommendations, submissions and observations made by the Office of Planning Regulator and the Northern and Western Regional Assembly.
- Outline the recommendations of the Chief Executive in relation to the manner in which the recommendations and issues raised by the Office of Planning Regulator and the Northern and Western Regional Assembly should be addressed in the development plan
- Provide a summary of all other submissions and observations,
- 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 and any relevant national and regional policies/objectives.

Next Steps

Following receipt of the CE Report, the Elected Members have a period of 12 weeks to consider the Draft Plan and the CE Report. During this stage, the Elected 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. Any proposed material amendments agreed by the Elected Members will be subject to screening for environmental

assessments to determine if SEA/AA is required and an appropriate timescale to facilitate SEA/AA if deemed necessary, will be required to be determined by the Chief Executive in accordance with Section 12(6) of the Planning and Development Act 2000 (as amended).

Following consideration of the Draft Development Plan and the CE Report, Section 12(5) of the Planning and Development Act 2000 (as amended) states that where a planning authority, after considering a submission of, or observation or recommendation from the Office of the Planning Regulator or from the Northern and Western Regional Assembly, decides not to comply with any recommendation made in the Draft Development Plan and the CE Report, it shall so inform the Office of the Planning Regulator and the Northern and Western Regional Assembly, as the case may be, as soon as practicable by notice in writing which notice shall contain reasons for the decision.

Format of Chief Executive's (CE) Report

Part 1 of the Chief Executive's (CE) Report contains the introduction.

Part 2 contains the submissions received from the OPR and the NWRA and the CE Response and CE Recommendations to these submissions.

Part 3 provides a summary of submissions by chapter (including appendices and environmental assessments) and the CE's response to the issues raised and the CE recommendations in this regard.

Appendix 1 contains the list of persons/bodies who made submissions and the prescribed bodies list.

This Chief Executive's Report on the Draft Development Plan consultation is hereby submitted to the Elected Members for consideration.

Council Meetings to consider the CE Report are set out below. These dates maybe subject to change.

Type of Meeting	Date
Special Meeting (CDP)	Monday 4 th July, 2022 - morning /afternoon
Special Meeting (CDP)	Wednesday 6 th July, 2022 - afternoon/evening
Special Meeting (CDP)	Friday 8 th July, 2022 -afternoon/evening
Special Meeting (CDP)	Wednesday 13 th July, 2022 – morning /afternoon
Special Meeting (CDP)	Monday 18 th July, 2022 - morning /afternoon
Special Meeting (CDP)	Thursday 21 st July, 2022 afternoon/evening
Special Meeting (CDP)	Friday 22 nd July, 2022 - morning /afternoon

Stages in the development plan process

Stage 1: Pre Draft
Publish notice of intention to review City Development Plan, public consultation and CE Report on consultation submitted to Elected Members.
Elected Members consider CE Report and give direction regarding preparation of the Draft Plan
Preparation of Draft Plan and environmental reports by CE
Elected Members amend and adopt draft plan
Stage 2: Draft Plan [Current stage]
Publish notices of Draft Plan public consultation and CE Report on consultation submitted to Elected Members.
Elected Members consider CE Report and Draft Plan and can amend or accept Draft Plan
Stage 3: Material Alterations (if amendments are material amendments to the Draft Plan)
CE to determine if proposed amendments require Appropriate Assessment/ Strategic Environmental Assessment.
Publish notices of proposed material alterations to the Draft Plan, public consultation on proposed material amendments and CE Report on consultation submitted to Elected Members.
Elected Members consider CE Report on proposed amendments and can amend or accept
Stage 4: Making of the Plan

Part 2

Summary of the submission from the Office of the Planning Regulator (OPR) including recommendations and observations

Summary of the submission from the Northern & Western Regional Assembly including recommendations and observations

OPR Recommendations and Observations (Submission no. GLWC-C2-165)

The Office of the Planning Regulator (OPR) has a statutory role in evaluating and assessing development plans and draft development plans to ensure consistency with legislative and policy requirements relating to planning. The submission by the OPR comprises three categories of observations:

OPR Recommendations

Recommendations which relate to clear breaches of legislative provisions, the national or regional planning framework or the policy of Government as set out in section 28 Ministerial Guidelines. The planning authority is required to implement or address recommendations to ensure consistency with policy and legislative provisions. The OPR submission includes 13 recommendations:

Recommendation 1 - Core Strategy Table and Settlement Hierarchy

Recommendation 2 – Zoning for Residential Use

Recommendation 3 – Tiered Approach to Zoning

Recommendation 4 - Compact growth and regeneration

Recommendation 5 – Low density residential zoning objectives

Recommendation 6 - Development Management Standards

Recommendation 7 – Co-ordination with Galway County Council

Recommendation 8 – Rural Housing

Recommendation 9 – Traveller Accommodation

Recommendation 10 - Joint Retail Strategy

Recommendation 11 – Renewable Energy

Recommendation 12 – Flood Risk Management

Recommendation 13 – Public Rights of Way

OPR Observations

Observations which take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. The planning authority is requested by the Office to action an observation. The OPR submission includes 8 observations:

Observation 1 - Development Management Standards

Observation 2 – Approach to zoning

Observation 3 – Distribution of Employment Lands

Observation 4 – Sustainable transport

Observation 5 – Climate Action

Observation 6 – Environmental reporting

Observation 7 – Implementation and monitoring

Observation 8 – Standardised Zoning Objectives

The OPR can also provide advice on matters that the OPR considers would contribute positively to the proper planning and sustainable development of the area. The planning authority is requested to

give full consideration to any advice contained in a submission. The OPR provides advice throughout the submission.

The planning authority is required to provide a summary of the recommendations and observations made by the OPR in this report.

Section 31P (1) (A) of the Planning and Development Act, 2000 (as amended) sets out the functions of the Office of the Planning Regulator (OPR) which include evaluation and assessment of development plans, including draft development plans, and provision of observations and recommendations to the planning authority as appropriate.

Under section 31p (1) (b) The OPR may inform the Minister if, in the opinion of the Office, the Plan is not consistent with its observations and recommendations, especially where, in its opinion, failure to do so would affect the overall strategy for proper planning and sustainable development of the area concerned.

In performing its functions, the OPR shall have regard to the requirements of the NPF and RSES. The OPR have evaluated and assessed the Draft Plan in accordance with Section 31 (AM). In assessing and evaluating the draft plan the Office shall endeavour to ensure that, it addresses the legislative and policy matters relating to development plans as follows: "(a) matters generally within the scope of section 10 and, in particular, subsection (2)(n) of that section in relation to climate change; (b) consistency with the development plan and the National Planning Framework (NPF) and Regional Spatial and Economic Strategies (RSES); (c) relevant guidelines for planning authorities made under section 28 , including the consistency of development plans with any specific planning policy requirements specified in those guidelines; (d) policy directives issued under section 29; (e) such other legislative and policy matters as the Minister may communicate to the Office in writing, the effect of which shall be published on the website of the Office".

In accordance with section 31 (AM) (6) "A planning authority shall notify the Office within 5 working days of the making of a development plan or a variation to a development plan and send a copy of the written statement and maps as duly made and where the planning authority — (a) decides not to comply with any recommendations made in the relevant report of the Office, or (b) otherwise makes the plan in such a manner as to be inconsistent with any recommendation made by the Office, then the Chief Executive shall inform the Office accordingly in writing, which notice shall state reasons for the decision of the planning authority".

OPR Submission

The OPR acknowledges the considerable body of work that has been carried out in the preparation of the Draft City Development Plan in the context of the national and regional planning policy and regulatory context and in particular commends the approach to facilitate and promote redevelopment on brownfield and infill sites; sustainable neighbourhoods; transportation; implementation and monitoring strategy and the preparation of the Galway Urban Density and Building Height Study 2021.

The office queries the population and housing targets in the Draft City Development Plan indicating that they are not consistent with the Housing Supply Target (HST) Methodology for Development Planning, Guidelines for Planning Authorities (2020) and must be reviewed.

In this regard also the OPR queries the amount of land zoned for residential development and recommends that this be reviewed with a particular focus on prioritising serviced lands closest to services and amenities and on existing or proposed public transport corridors.

The OPR office indicates that the 'LDR Low Density Residential' zoning objective is in conflict with national and regional policy.

Core Strategy and Settlement Strategy

Housing and population targets

The OPR confirm that the total City population projections to 2029 are generally consistent with the population prescribed for the City in the RSES and NPF.

The OPR estimates that the housing supply targets calculated in accordance with the HST Methodology Guidelines (2020) as c. 6,400 (including additional provision) for the plan period, while the current Core Strategy table shows these higher.

The OPR notes that the Housing Supply Target calculated in accordance with the Guidelines has not been applied for the Core Strategy (Table 1.8) and states that the Draft Development Plan Guidelines (2021) specifies that the HST methodology in the guidelines must be used in meeting the statutory obligations in the Core Strategy.

The OPR requires revisions to the Core Strategy.

Recommendation 1 - Settlement Hierarchy and distribution of growth

The OPR states that the information provided in the Core Strategy of the draft Plan regarding the settlement hierarchy is too broad.

The Core Strategy table (table 1.9) provides a very high-level view of potential development yield of zoned land across only 4 categories. It does not co-ordinate the neighbourhoods identified in the Core Strategy map (Figure 1.6) with the Core Strategy table, or provide any indication of the expected distribution of growth across these areas.

The OPR states that the Draft City Development Plan does not provide a clear vision as to the prioritisation or timing for the delivery of the Regeneration and Opportunity sites which results in a lack of clarity regarding the Draft City Development Plan's strategic preferences for development (and associated infrastructure), and the portion of the HST figure that could realistically be delivered in each neighbourhood area/ regeneration area over the plan period.

The absence of a more detailed Core Strategy table also makes monitoring the implementation of the Plan more difficult in terms of progress on meeting housing targets for the plan period.

Recommendation 1 - Core Strategy Table and Settlement Hierarchy

In accordance with the requirements of sections 10(2A) (f), (g) & (h) and 10(2C) of the Planning and Development Act 2000, as amended, and having regard to the Housing Supply Target Methodology for Development Planning (2020), Guidance Note on Core Strategies (2010) and the Development Plans, Guidelines for Planning Authorities - Draft for Consultation (2021), the planning authority is required to review the Core Strategy in Chapter 1 of the draft Plan and revise as necessary to:

- (i) provide a single Core Strategy table for the city as a whole which includes housing supply targets specific to the plan period calculated in accordance with the section 28 guidelines Housing Supply Target Methodology for Development Planning (2020) and Appendix 1 of the accompanying Ministerial Letter to Local Authorities of 18/12/20;
- (ii) provide a broad settlement hierarchy which clarifies the draft Plan's strategic preferences for development, with a distinction between the city centre area; specific neighbourhoods where housing is planned to be located consistent with the Core Strategy Map; regeneration and opportunity sites which are likely to be developed over the plan period: Ardaun Phase 1, Ardaun Phase 2, and other lands as relevant; and
- (iii) revise the population and housing supply targets for the plan period for each area in (ii) above, including an aggregate population and housing supply target for areas outside of Class 1 to 4 (Table 1.9), i.e. areas designated with the land use zoning objective 'Low Density Residential and/or Agriculture'.

Regarding OPR Recommendation 2 - Zoning for Residential Use

The Core Strategy has identified that sufficient land has been zoned for 11,111 homes over the plan period (Table 1.4), significantly above the OPR HST calculation of c.6,400. Allowing for 20 – 25% 'Additional Provision' provided for under the draft Guidelines (2021) (section 4.4.3) there is still a significant surplus of zoned land which should be reviewed to provide for greater focus and prioritisation over the plan period.

This level of zoning, together with the lack of a clear identification of where development would be best located in the Core Strategy, makes it difficult to direct investment in social and physical infrastructure in a manner that will provide for the needs of existing and future residents, and ultimately undermines the delivery of sufficient new homes.

Development Plan guidelines require a sequential approach to zoning whereby the most centrally located areas close to existing services and amenities and well served by public transport are prioritised for new development. The focus of the development plan must be on securing sufficient infill and brownfield development and regeneration, and prioritising new development along high quality public transport corridors.

The planning authority should review the zoning of lands that are further located from the city centre and situated on the edge of the city boundary, including any sites that are unlikely to come forward for development during the course of the plan cycle, and which in some cases would undermine the achievement of compact sustainable development.

Consideration should be given to prioritising or phasing the development of certain lands, and/or alternative objectives by indicating lands that will be considered for alternative appropriate uses within the plan period.

Regard should be had to the location of undeveloped residential land in the newer suburbs consistent with the provisions for a sequential approach to zoning for residential development, with particular regard to public transport corridors and transport nodes; and the extent of masterplans and local area plans for specific Regeneration and Opportunity Sites and identifying sites, or parts of larger sites, that will be phased and built out over a longer period than the six-year development plan, aligned with the delivery of enabling infrastructure and consistent with the approach set out in section 4.4.3 of the draft Guidelines (2021).

Recommendation 2 – Zoning for Residential Use

In accordance with section 10(2A) of the Planning and Development Act 2000, as amended, and having regard to the approach ensuring sufficient supply of housing lands and the principles of sequential development set out in the Development Plans, Guidelines for Planning Authorities (2007) and the Development Plans Guidelines for Planning Authorities - Draft for Consultation (2021), the approach to zoning required under National Policy Objective 72 (a-c), and the NSO for compact growth and NPO3 of the NPF, the planning authority is required to:

- (i) review the extent of land zoned for residential or a mixture of residential and other uses in the Core Strategy (table 1.9) to ensure consistency with the revised housing supply targets, as calculated under the section 28 Housing Supply Targets Methodology for Development Planning Guidelines for Planning Authorities (December 2020), and Recommendation 1 above;
- (ii) confirm or provide that the densities used in the calculation of housing yield are based on density assumptions consistent with the Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) Guidelines for Planning Authorities (2009), and the Galway Urban Density and Building Height Study (2021);
- (iii) where the potential housing unit yield of zoned land exceeds that required to meet the projected housing supply target, the planning authority is required to amend the Core Strategy and zoning map to prioritise appropriately located land with delivery potential within the plan period, and to phase or re-zone residential development less peripherally located in the new suburbs having regard to the principles of sequential approach to zoning and compact growth; and
- (iv) amend the Core Strategy table to include the area zoned to accommodate residential development in hectares and estimated housing yield for each area as specified under Recommendation 1, specifically identifying the 'Additional Provision' where relevant. review the extent of land zoned for residential or a mixture of residential and other uses in the Core Strategy (table 1.9) to ensure consistency with the revised housing supply targets, as calculated under the section 28 Housing Supply Targets Methodology for Development Planning Guidelines for Planning Authorities (December 2020), and Recommendation 1 above;

Sustainable Development - Infrastructure Capacity Assessment

The OPR welcomes the inclusion of the Settlement Capacity Audit (Section 1.5) and infrastructure tier in Table 1.9, in addition to the details regarding Regeneration and Opportunity Sites in Chapter 10 of the proposed draft Plan.

Infrastructure capacity is required to be presented in the plan in a more comprehensive and detailed format consistent with Appendix 3 of the NPF, to distinguish between lands that are fully serviced and lands that have outstanding requirements for specific service/infrastructure provision, but which can feasibly be provided during the plan period.

The inclusion of information regarding infrastructure capacity and constraints provides greater clarity for the development sector and enables the local authority and other agencies to focus delivery of essential infrastructure, services and facilities on more precise locations where housing can be more rapidly developed, supported by transport and amenities.

The planning authority should also highlight key requirements for constraints identified in respect of Opportunity Sites. For example, Section 10.17 Doughiska Road Opportunity Site has restriction of access to the N6 "dual carriageway " and associated junction, with mitigations required and significant water and wastewater network reinforcements will also be required. The phasing and prioritisation of residential zoned land taking account of water services infrastructure in accordance with Recommendation 2 above should also be informed by this exercise.

Recommendation 3 – Tiered Approach to Zoning

Having regard to NPO 72a, NPO 72b and NPO 72c, and the Development Plans, Guidelines for Planning Authorities - Draft for Consultation (2021), the planning authority is required to elaborate and expand upon its infrastructural assessment, as necessary, to fully address the status of all residential lands zoned under the plan in accordance with the methodology for a tiered approach to land zoning under Appendix 3 of the NPF, relating to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage, water supply and/or additional service capacity. It must also include, if required, a reasonable estimate of the full cost of delivery of the required infrastructure to the identified zoned lands at draft and final plan stages of the plan making process.

Compact Growth and Regeneration

It is an objective (NPO 3b) of the NPF that 50% of all new homes in the five cities and suburbs, including Galway, are to be delivered within the existing built up footprint. This is supported by several other objectives in the NPF including NPO 6 and NPO 7 (regeneration) and NPO 13 (development standards) and by objectives in the RSES. The OPR considers that greater clarity and direction as to how these objectives are to be achieved is required in order to ensure the plan is consistent with both the NPF (NPO 3) and RSES (RPO 3.2).

Recommendation 4 - Compact growth and regeneration

In order to ensure that the delivery of 50% of all new homes within Galway City and suburbs takes the form of ‘infill’ or brownfield development within their existing built-up footprints, and for consistency with NPO 3 and RPO 3.2, the planning authority is required to identify and quantify the zoned land within the city council boundary that will contribute to this target and include details of same in the revised Core Strategy table. In this context, the planning authority should have regard to the definition of brownfield and the range of infill development provided for under the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009).

Development Plans Guidelines for Planning Authorities - Draft for Consultation (2021) (appendix A) provides a useful reference and illustrative example for the presentation of this information in the Core Strategy table).

Chief Executive's Response

Re –Recommendations 1, 2, 3 and 4.

As No. 1 to 4 are interconnected it is proposed to address these hereunder in a composite manner. They relate in general to concerns regarding the Core Strategy and the reconciliation of the expressed housing and population targets therein with the S.28 Guidelines Housing Supply Target (HST) methodology. The recommendation requests that any consequent analysis that shows that residential land use zonings are inconsistent with the amount of zoned lands required, as identified by the HST methodology, should be appropriately phased or re-zoned. In addition the OPR has sought a more granular, quantified settlement strategy aligned and distributed with the identified Draft City Development Plan (DCDP) neighbourhoods, including establishment of the priority of regeneration/opportunity sites. It has also been requested that clarity with respect to priority for development zoned lands is allied to infrastructure capacity/constraints or intended investment. Regarding the latter the OPR recommends that zoned lands are identified in accordance with NPF NPO objectives that is to identify these in a “tiered” phased timeline delivery manner which registers their deliverability in accordance with infrastructural provision. It is also required to clarify that the DCDP ensures that delivery of 50% housing is within the existing built up footprint as per NPO 3 and RPO3.2. These have been addressed in the proposed amendments and given some contextual basis hereunder.

It is accepted that the Core Strategy tables and settlement hierarchy as shown in the DCDP more adhere to the strategic approach and ambitions of the NPF, RSES and Galway MASP regarding population growth and settlement. It is also confirmed as was alluded to in the DCDP, (see Section 1.5.2 Settlement Capacity Audit) that much of the anticipated growth would not be occurring during the currency of the 2023-29 plan period, but rather it was included to support and embed alignment with the NPF and the concept of compact growth, infill and regeneration (NPO 3b), to show alignment with the Galway Transport Strategy (GTS) and other associated investment strategies which are ongoing, to have a coordinated approach with strategic future investment in public and sustainable transport modes, to accord with future investment and planned strategies of service and social infrastructure providers and to inform the public and investment sector in the longer term MASP context. Strategic investment requirements, particularly for a city, require a longer lead in time than the development plan 6 year cycle and need to be plan led with a settlement strategy supported and recognised in the RSES and NPF.

The RSES in their submission confirmed that they supported this approach. Follow up discussions with the executive of the NWRA also confirmed that they are satisfied with this approach.

These factors are relevant to the Core Strategy approach which took cognisance of section 2.1 of the HST Guidelines in this regard which state the following – *“These established NPF Roadmap projections for each County continue to be the population parameters for local authority development planning process. City and County development plans must therefore plan for the identified population growth within these estimates and use them as the basis for strategic decision-making in their development plan process, including its Core Strategy, settlement strategy and housing policy.”*

The NPF implementation strategy too stresses that *“A key part of the NPF/NDP strategy is to target significant future growth and development in all five of Ireland’s cities. To achieve this will require clear focus on a high-level and long-term strategic vision for each, in order to identify critical priorities for sequencing and delivery. The MASP is the appropriate vehicle to address the area that most directly supports the core city area”*.

Notwithstanding the need for a strategic perspective, the approach in the DCDP accords with NPO 3(b), the vision and shared goals in the NPF and the RSES and Galway MASP with respect to promoting compact growth and regeneration. To note this has been the general agenda pursued over recent cycles of development plans where the settlement strategy has focused on restraining additions to the residential zoning, and pushing the agenda for consolidation to drive sustainable compact growth. Historical plans also included for emerging regeneration sites, some of which have advanced to planning application and construction stage and are identified in the RSES. This approach allowed for specific co-ordination with the Galway Transport Strategy since inception in 2016, allowed for appropriate investment to be co-ordinated with other physical infrastructural investment, particularly Irish Water where there is continuous engagement and collaboration.

The DCDP represents a very limited increase in residential zoned lands in the city from that which exists in the current plan. Reflecting imminent upgrades in IW servicing infrastructure three pockets of former low density zoned lands (LDR) in the outer suburb (eastern) neighbourhood of Doughiska which is a well-established neighbourhood, historically supported in delivery by state funded Service Land Initiatives, have been changed to high density residential use (circa 17ha). This area is supported by an array of existing services including schools, hospitals, generous parkland amenity, commercial /community services, and proximity to a large employment base at Parkmore. It is also scheduled to have an enhanced public transport and sustainable service as planned for in the GTS and reflected in the policies and objectives in the DCDP. To note also there was a need to reduce residential zoned land in the DCDP as current residential zoned lands has been recently acquired by ATU which has now been designated for institutional use having been recently acquired for university expansion purposes considered suitable strategically being proximate to their campus. The resultant overall quantum of land designated specifically for residential zoning is only marginally changed from the 2017- 23 plan.

Similarly on the outer suburbs (western) neighbourhood there is a significant established level of development supported by services, amenity, schools and a range of lands which have the benefit of

grants of permission for housing, including a substantial amount granted under the SHD process and under Part 8 for social housing and others advancing at application stage for social housing/AHB's/Traveller Specific housing – all supporting the Housing For All “pathway for increasing new housing supply” approach as proffered in this, the national housing strategy.

To further clarify, as of May 2022 there are grants of permission for approximately 2,300 housing units in the city – a significant amount granted under the SHD process, some at early construction stage but most not commenced to date. In addition there are over 800 housing units with An Bord Pleáinála – some the subject of appeal, some local authority schemes (AA required), some on regeneration sites and others, current applications under the SHD process. These are mostly located on lands currently zoned for residential purposes in all of the neighbourhoods throughout the city and identified in the current CDP settlement strategy as consolidation of existing neighbourhoods.

To re-affirm the DCDP includes for a marginal change in residential zoning from the 2017 CDP and is as previously referenced a continuation of an inter plan settlement policy of consolidation and infill rather than expansion of peripheral residential zonings as is described in OPR recommendation 2 (iii).

Within these residential zones there are small pockets of lands with specific constraints and it is recommended these are now classed and quantified as per Tier 2 / Long Term Strategic Reserve. Their locations are not necessarily peripheral nor non sequential – they have specific constraining characteristics that are likely to be resolved in time but regardless are not separate from the “built footprint” of the city as defined in the NPF.

The current residential areas are also co-ordinated with the retail strategy hierarchy and are supported by designated district /neighbourhood centres where the existing and draft plan encourages and has achieved a mix of community uses, other than retail and with increased permeability which will further enable development of the “15 minute city concept”. They are also linked with the Recreational and Amentiy Needs Assessment (RANS) program of policies and also in general serviced by Irish Water infrastructure.

Specifically regarding compact growth and the OPR query on compliance with NPO 3 – the Council can confirm all lands zoned R accord with “the built up footprint of existing settlements” and the footnote explanation of definition as per CSO as provided for in the NPF. The DCDP Core Strategy provides for and exceeds the ambition to deliver at least 50% of all new homes within this footprint of the built up area as required in the NPF/RSES. Progress regarding this has been reaffirmed by the NWRA Implementation Strategy data analysis (May 2022 – Planning SPC presentation) which concluded that an average of 75% pa of housing in the MASP area since 2016 has been constructed within this footprint.

The foregoing indicates that adopting an approach to phasing of the residential zoned lands in the DCDP (excluding Ardaun phasing and pockets of R zoned lands) is not considered necessary to accord with national and regional policy. Most of these lands are serviced, designated for sustainable transport investment, many have the benefits of grants of permissions and the approach is to consolidate and further densify these lands to contribute to creating the critical mass that aligns with the implementation strategy included for in the GTS. The DCDP has applied this evidence based approach in the zoning of lands and adopted an approach of compact infill and consolidation of the built up footprint of the city which only allows for a limited capacity to be further sequenced/phased as referenced for Ardaun,

The DCDP approach reflects the need to have a balanced approach to plan making as referenced in the Draft Development Plan Guidelines for Local Authorities-(2021) “A primary focus of the development plan is to ensure that the plan that is adopted has been informed by the relevant plans and strategies of the Government and other statutory public agencies, but has also been influenced by an understanding and analysis of the local context of the area for which it has been prepared.”(DPG Section 1.3 pg. 12.). The draft guidelines appreciate this element of local knowledge, experience, and local evidence based data as an important contribution to understanding the factors that can enable the delivery of sustainable housing and which does not always lend itself to be captured through a more generalised analysis.

It is acknowledged that the city in general is not serviced as of yet with a modern, high frequency public transport system. The GTS is the response to this need, which includes significant measures for public and active modes of transport and is the informing transport strategy, which has a 20 year implementation period. The GTS is aligned with the settlement strategy and includes supporting policies and objectives are included throughout the DCDP in both the written document and supporting DCDP map.

The GTS clearly indicates that the strategy includes for the servicing of all the currently zoned lands based mainly on a high frequency bus service routes and complemented by a network of secondary bus routes and a network of walking / cycle routes. Projects associated with the strategy are advancing some from, design and consent stages with a number of smaller projects at delivery stage. A number of these projects are supported under URDF funding and also under NTA/NPF funding. These projects also includes the N6 GCRR (which will have the impact of removing traffic from the unnecessary routing through the city freeing space on routes for bus priority/cycling/walking and better public realm). This project has been consented by An Bord Pleanala and is currently under judicial review. To note both the N6 GCRR and the main thrust of the GTS (Galway Bus Connects) are identified projects under the NPF and the NDP investment program and have support from TII/NTA and are being advanced at local authority level transport section. As previously indicated the GTS is aligned with the current settlement strategy/zoning and associated core bus routes are planned and coordinated with same as provided for in Ch. 4 of the DCDP and in the GTS document.

In this regard the current zoning for residential accords with national, regional and local investment strategies for sustainable transport – the delivery program may not be synchronised in time with housing delivery owing to the challenges of advancement of projects, and funding streams but it is integrated with the land use zoning and taken into consideration at development management stage. It is the transport investment strategy being pursued since 2017 and supported in the NPF, NDP and RSES/MASP and will be delivered and bring the associated sustainable benefits in time.

It is stressed that the draft plan embraced the particular emphasis that the NPF, RSES and MASP places on specific target growth and consolidation. The only lands identified for significant development outside of the main bank of residential zoning is the Ardaun LAP area. This urban extension too forms part of the national and regional strategy. It is classified as a MUDHS site at national level, it has been identified as a key enabler for Galway as a regional city under the NPF. It is a key settlement strategy specifically identified for growth under the Galway MASP. It is considered also that Ardaun LAP area has potential to be classed as an Urban Development Zone (UDZ) as provided for in the national housing strategy - Housing for All. This will be examined in advance of the LAP expiration in 2024, and has been the subject of high level discussions also with key stakeholders including the LDA, IW, NTA Dept. Ed. and landowners.

As referenced in the DCDP the housing delivery in Ardaun is reliant on significant infrastructural investment. Much of this is being co-ordinated with the various service providers including Irish Water, URDF funded projects, NTA projects and Galway City Council's capital program. Additional investment will be required by the private sector also or the private sector supported by any emerging initiatives for servicing land.

It is acknowledged that investment and works to enable activation of the lands – Martin Junction upgrade (URDF) 2022 and IW Ardaun Wastewater Network Extensions (2024) are key enablers particularly to deliver on unit delivery on Phase 1 lands by the end of the plan period. However additional investments will be also needed for the overall LAP area which will include for a second access to the south, access for the northern lands (a requirement of the ABTA), a Surface Water Area Plan and ultimately the design and implementation of any relevant strategic wastewater measures that come from the Galway Strategic Drainage Study, a study scheduled to be carried out in 2023. On review in the context of OPR recommendations it is reasonable to reduce the allocation of the target completion of build in Ardaun phase 1 to 500 housing units within the plan period aligned with investment, in particular afforded in the near future by investment in IW Ardaun Wastewater Network Extension, the GTS transport investment measures and the URDF funded access upgrade. This infrastructure will continue to enable development at Ardaun Phase 1 beyond the plan period but as stated, it is most likely that other strategic investment will be required consequently to enable the

development of the Ardaun Phase 2. Therefore when reviewing the most likely scenario for Ardaun phase 1, it is appropriate to target 500 completed units in Tier 2 of the Core Strategy for the draft plan period with continuing development afforded by planned investment occurring after that period.

The main thrust of any phasing of R residential zoned lands therefore relates to a portion of the residential zoned lands with specific site delivery challenges and to Ardaun Phase 1 and 2. This has now been factored into the quantum of residential zoned lands available during the currency of the plan period and the Core Strategy has been recommended to be amended accordingly. The Core Strategy has also as is referenced below, reflected the recommendation of the OPR to prioritise the regeneration/opportunity sites and adjust the estimated potential therein to accord with the delivery potential within the plan period, having regard to the principles of sequential approach and compact growth and also as included for in the Draft Development Plan Guidelines (2021) application of an understanding, analysis and experience of the local context of the area.

The main changes regarding the settlement strategy in the DCDP from the current plan is to specifically identify a range of regeneration sites, which are substantially brownfield and earmark other “opportunity” (mainly infill) sites, close to the centre and services. These have operating uses but which could accommodate infill housing, or in time re-locate where flexible, their current uses to provide for more sustainable uses on serviced sites close to the centre e.g. LDA Sandy Road Regeneration site section 10.8. This approach will deliver on the strategic outcomes. As stated most delivery in this regard will be during the currency of subsequent plans but needs to be strategically identified for the public, the owners, prospective investors and service providers. In addition these have been the subject of consultation with a number of interests including all service providers, the LDA, Dept. Education, site owners and internally within GCC directorates. Some of these sites already through a collaborative process have also had the benefit of successful URDF funding. It is a good outcome also that the public consultation process on the draft plan has, in relation to these sites been positive excepting for one site which is now recommended to be omitted as an opportunity site from the DCDP. It is not recommended to make any changes with regard to the balance of regeneration /opportunity sites other than that provided for in the for Core Strategy for phasing of housing delivery and also for identifying a priority hierarchy in relation to these sites.

With respect to the aforementioned regeneration and opportunity (infill) sites, these were examined individually. They required a more specific site level analysis to determine the estimated capacity balanced with likely demands for other uses on these sites, desirable level of mix. This included for analysis of their location with respect to services and GTS transport investment plans, their planning history, emerging proposals, collaborative engagements particularly under the URDF process, LDA involvement and other potential synergies. It also included for application of Spatial Strategy Section D of the *Urban Density and Building Height Study* as referenced in Section 1.5.1 of the DCDP and the priority given in recognition in the NPF, RSES and the MASP.

This enabled a more refined estimate of the potential targeted delivery of housing units on the regeneration/opportunity sites during the currency of the plan period which is reflected in the proposed amended Core Strategy table.

Specifically with regard to recommendation 2 (ii), the local authority can confirm that density assumptions accord with a number of S.28 Guidelines including Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) Guidelines for Planning Authorities (2009) Urban Development & Building Height (2020) and the Galway Urban Density and Building Height Study – Galway and other parameters such as planned investment in public transport. The methodology of calculating capacity audits is explained in Section 1.5.1 and Section 1.5.2. In this regard it can be confirmed that capacity for residential land was calculated in general at net density of 40 units per hectare. For Ardaun residential zoned lands were calculated at net density of 50 units per hectare as advised by the Minister during the consultation phase of the Draft Ardaun LAP.

In summary acknowledging the need for a strategic perspective and having regard to recommendation 1 (i) (iii) the Core Strategy table has been amended. It accords with the outcomes of the HST targets analysis plus the application of headroom and taking cognisance of the concept of “transitional population projections” as provided for in the NDP roadmap.

It is considered that the concept of “transitional population projections” which is greater than a standardised 25% headroom is provided for in the Implementation Roadmap of the NPF and supporting Circular FPS04/2018 and applies to certain counties /cities including Galway City. (NPF Roadmap pg.5). The NPF roadmap states *“This has given rise to a requirement for a transitional set of population projections to inform City and County Development Plans for the periods to 2026 and 2031 in particular. These projections provide for a transitional approach to delivering better alignment between the plans at the different levels.”* (NPF Roadmap pg. 4). In addition it states that- *“The transitional projections based on the methodology described above and in Appendix 2, add a further 25%, over and above the population projected to 2026 in the NPF.”* (NPF Roadmap, pg.5)

This is further reflected on and included for in the RSES where it states that there is inclusion of these transitional figures – see Galway City Table 3 and associated population uplift figures up to 2026 (pg. 40) RSES.

The purpose of this ‘headroom’ allowance is an established feature of Development Plans. It was given clarity in the Development Plan Guidelines (2007). When referring to ‘headroom’, the NPF Roadmap specifically refers to Section 4.14 of the 2007 Guidelines which states the following:

‘Planning authorities should take all reasonable steps to ensure that sufficient zoned residential land is available throughout the lifetime of the development plan and beyond to meet anticipated needs and allow for an element of choice. In particular, to ensure continuity of supply of zoned residential land, planning authorities should ensure that at the time they make a development plan, enough land will be available to meet residential needs for the next nine years. In this way, development plans will provide for sufficient zoned land to meet not just the expected demand arising within the development plan period of six years, but will also provide for the equivalent of 3 years demand beyond the date on which the current plan ceases to have effect.’

The intended purpose of ‘headroom’, as stated in the 2007 Development Plan Guidelines, is to ensure that there is sufficient residential zoned land available throughout the Plan period and beyond, and to allow for an element of choice. This allowance is particularly important to ensure that: planning permission may be granted within the lifetime of the plan which may be delivered during the lifetime of the subsequent plan-period; and, that there is sufficient availability of land in a land-market which is susceptible to various impediments. The latter is certainly in evidence currently and well documented by government bodies, investors, and the construction sector.

The NPF Roadmap also specifically refers to the 2007 Guidelines when outlining the rationale for inclusion of the additional population ‘headroom’ allowance (Pg. 5 NPF Roadmap). It is considered that the application of population ‘headroom’ in the Draft Plan informs the period up to 2031, is in line with the intended role of ‘headroom’, as set out in the relevant Section 28 Development Plan Guidelines and as referred to in the NPF Roadmap and in the “transitional population projections” as was incorporated into the statutory RSES which provided a breakdown of population for the regional city of Galway to 2026 and 2031. This was reflecting the whole thrust of the NDP and the support for headroom which is particularly relevant to urban areas and the five cities, where the aim is to target at least half of future housing delivery within the existing built-up area. To clarify also the original interpretation of “headroom” is the one adopted for the DCDP.

To conclude having reviewed the housing targets and the Core Strategy the finalised output show that lands zoned and serviced /serviceable during the currency of the plan period has a housing supply target of 6,650 which includes for both Tier 1 and Tier 2 (with a further reduction for 1 year construction rate). The Core Strategy also includes for the strategic reserve which is mainly included for in Ardaun LAP but also includes for a gradual uptake on the regeneration /opportunity (infill) sites also beyond the period of the plan and for a small portion of residential zoned land which has specific challenging site constraints currently which may be resolved in the next cycle of the city plan post 2028.

It is considered that the proposed amendments will give more clarity to the alignment of the Core Strategy and with the HST Guidelines and appreciate that the proposed amendments as provided for in the revised text, tables and narrative give a better presentation that demonstrates consistency with

the Section 28 Housing Supply Targets Methodology for Development Planning Guidelines for Planning Authorities (December 2020) and RSES, MASP, NPF approach, objectives and implementation advices.

The local authority welcomes the OPR submission and in general considers that the proposed amendments gives an enhanced understanding of the settlement strategy, Core Strategy and how these are in alignment with the RSES/MASP and NDP.

In summary the CE has recommended proposed amendments which it is considered address the OPR submission, issues raised and recommendations No. 1, 2, 3 & 4.

Recommendation 1 (i), (ii) and (iii) can be addressed through proposed amendments as provided for

- (i) Inclusion of a single Core Strategy table for the city as a whole which includes housing supply targets specific to the plan period calculated in accordance with the section 28 guidelines Housing Supply Target Methodology for Development Planning (2020) and including for headroom as provided for in the NPF Roadmap and taking account of the associated "transitional population projections" as also provided for in the statutory RSES. Supporting text edits to relevant associated text from Section 1.46 to Section 1.6 of the DCDP.
- (ii) Provision of a broad settlement hierarchy which refers to the RSES Settlement Hierarchy and the direction therein for the MASP area recognising the strategic locations directed in the MASP for growth (See Section 3.6 of RSES pg.53) that is as referenced, neighbourhood consolidation; referenced regeneration sites; Ardaun Urban extension.
- (iii) Revision of housing targets for each class of land zoned in capacity audit table. Revision including housing target estimated for housing on LDR/A lands (these are based on the average p.a. level of grants of permissions for such housing excluding replacement housing, over the last 5 years).

Recommendation 2 (i), (ii), (iii) and (iv) have been clarified and can be addressed through proposed amendments as provided for regarding

- (i) Proposed amendments to settlement hierarchy, capacity yield, Core Strategy amendments and associated classification of phasing included for conclusion of review.
- (ii) Densities/yield have been confirmed to be in accordance with the Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) Guidelines for Planning Authorities (2009), and the Galway Urban Density and Building Height Study (2021). As included for in CE response it is not considered necessary to revise any R land use zoning, regeneration /opportunity sites relevant to these recommendations following proposed clarification as provided for in the proposed amendments.
- (iii) Core strategy table includes for phasing (Tiers) in accordance with the NPF objectives
- (iv) Core strategy table has been amended to include for estimated housing yield/population for each neighbourhood area. The argument regarding why "additional provision" is not specifically identified geographically is as per reasons identified in the CE response.

Recommendation 3 – Tiered Approach to Zoning has been provided for in proposed amendments -

Proposed amendments have been made to the settlement hierarchy, capacity yield, and Core Strategy. Proposed amendments and associated classification of phasing addresses the requirement for a Tiered approach in addition to further clarification as proposed in changes to text in Chapter 1. A proposed recommendation for inclusion of a broad Infrastructure Capacity/Constraints Study is also recommended to be included in the appendices of the DCDP.

Specifically regarding the OPR requirement to provide for a 'reasonable estimate' of the full costs as per NPO 72b of the specified services to be included in relation to infrastructure. The local authority has a number of concerns and challenges in providing such information. This includes the dearth of any guidance and methodology for carrying out this assessment including for no definition of what is considered a 'reasonable estimate' of the costs. Large infrastructure projects are required to follow a structured procedure from preliminary design, to detailed design, to consent before arriving at

'reasonable estimate' of costs. This is most relevant to the strategic IW infrastructure projects, NTA and TII projects. It is also relevant to the range of measures included for in the GTS which are advancing from design to project stage. In view of this the local authority is not in a position to provide a set of costs that it would consider to be reasonable. In addition, other issues such as confidentiality, data protection, procurement rules, inflation rates, volatile construction costs also have to be considered, particularly for larger projects. Irish Water specifically stated when queried that they are not in a position to provide these costs and reiterated that this has already been conveyed to the Department and the OPR. Taking the foregoing into account an estimate for the costs of the delivery of infrastructure is not feasible to be included in the assessment as the local authority is not in a position to provide a 'reasonable estimate' given the number of uncertain variables.

Recommendation 4 - Compact growth and regeneration

As previously affirmed all targeted housing other than the NPF/RSES/MASP recognised urban extension at Ardaun is accommodated within the Galway City and Suburbs as provided for and defined in NPO3 and RPO3.2. As is apparent from the proposed amended Core Strategy table the vast majority of housing is targeted to be delivered on **R** residential zoned land and/or lands designated for mixed use including residential as identified as brownfield /infill in the Core Strategy table.

Chief Executive's Recommendation:

Amend Section 1.4.6 to Section 1.6 of the Draft City Development Plan (DCDP) and omit strike out text and tables and replace with proposed amended text in green and new tables, as follows

1.4.6 Housing Target for the Core Strategy

Galway City's development plan, unlike other local authorities, particularly those including county areas does not have a need to prepare a settlement hierarchy being a single settlement area. However the Core Strategy acknowledges the broader spatial context of the MASP area and the associated strategic planning framework which identifies Strategic Growth Areas and opportunities for regeneration. The MASP has also identified the key infrastructure, services and facilities that will be required to support sustainable city growth and regeneration. It gives direction on how the NPF population targets can be met in accordance with the principles of sustainable development with the aim to deliver compact growth. The population targets set out in the MASP are for the Galway MASP area to grow by **27,500** to the year 2026 and by a further **14,500** to the year 2031. For the city and suburbs, the population targets set out in the MASP are to accommodate **23,000** persons to 2026 and a further **12,000** persons to 2031, this increase in housing need is to be substantially delivered within the existing built-up footprint.

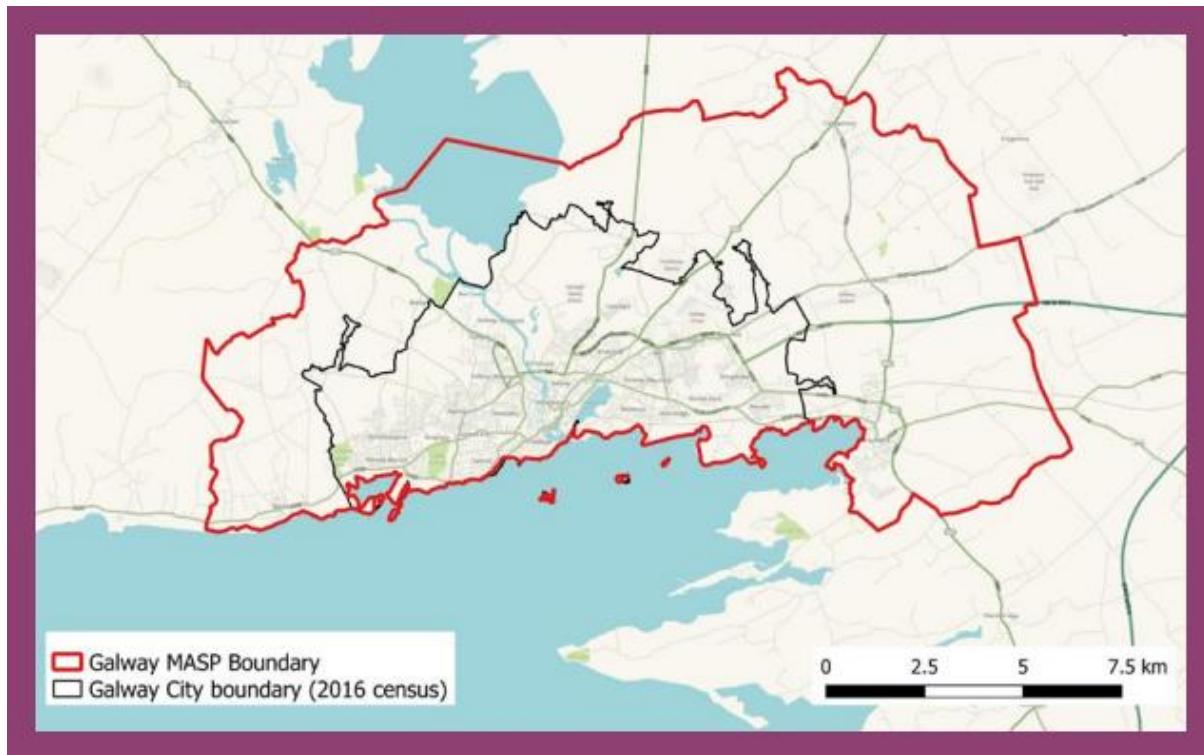


Figure 1.1 MASP area as defined in Metropolitan Area Strategic Plan

It is acknowledged that these population forecasts are targets and may not be achieved by the benchmarked years of 2026 and 2031, but regardless strategic provision should be made to demonstrate how these can, with additional investment facilitate the opportunity for such growth on-zoned lands within the existing local level plans in the in the longer term and reinforce the objectives for compact growth and accord with the overall MASP area as shown in Figure 1.4. This will support the objectives of the NPF and the RSES to deliver Galway Metropolitan area as a national strategic growth area with the ability to accommodate the compact sustainable growth levels envisaged in the NPF to be reached by 2040.

The MASP identifies areas of growth potential in the settlement and development strategy for the city and makes inclusion for growth in the county settlements within the metropolitan boundary. Together these will contribute to the critical mass needed to make Galway City and environs achieve regional city scale and when combined with the other regional cities to function as a realistic alternative to Dublin and achieve a key NPF national strategic output.

(Omit Table1.7) Insert revised Table 1.7 RSES Settlement Hierarchy as applicable to Galway City

Metropolitan Area Strategic Plan - Growth Areas
Strategic Growth Areas – Ardaun LAP Area
Regeneration Lands at Ceannnt Station Quarter, Inner Harbour and Headford Road LAP area
Consolidation of the existing neighbourhoods of Knocknacarra, Rahoon, Castlegar and Roscam Murrough LAP Area
Galway County Council MASP Area – Baile Chláir, Bearná, Oranmore and Briarhill are identified to accommodate a portion of the MASP population growth targets (see Galway County Council Draft Plan 2022-28)

Table 1.1 MASP Strategic Growth Areas

Table 1.7 RSES Settlement Hierarchy as applicable to Galway City

Classification	Settlement Typology	Description	Galway City
MASP – Regional Centre	Galway City and Environs	The city is the main urban centre in the region. It operates as a key economic and service centre for the NW region and is a key driver in regional development therein. The associated MASP area is the primary centre identified for growth in the region.	Majority of urban footprint is in the Galway City Council area.
Regional Growth Centre	Large Towns	Large Towns with a high level of self – sustaining employment and services.	None
Strategic Growth Areas	New Urban Extension	New sustainable high –quality neighbourhoods to meet the housing demands based on population targets in NPF & RSES	Ardaun Phase 1 Ardaun Phase 2 Murrough
Strategic Growth Areas	Existing Neighbourhoods	Neighbourhoods that have been established since 80's and 90's	Consolidation of Knocknacarra Rahoon Castlegar Doughiska /Roscam
Key Towns	Towns	Towns that have capacity to complement regional growth centres and the MASP	None
Regeneration Sites	Re- used redundant /underused brownfield sites	Large brownfield sites in built up urban area	Inner Harbour/Galway Port Ceannt Quarter Headford Road Regeneration Area

Metropolitan Area – Galway City

The period of the plan extends from 2023 to the end of 2028 and is therefore the focus of the housing target for the Core Strategy. The RSES in Section 3.6 has included a growth target for the city metropolitan area to reach **23,000** persons by 2026 and a further **12,000** persons by 2031, equivalent in total to an increase of **35,000** persons by the end of 2031.

The HNDA exercise as explained in Section 1.4.3 has the associated purposes to allow for a standardised national and regional monitoring of settlement patterns and also to reflect historical trending. In contrast the growth targets in the NPF and the RSES are more ambitious and driven by the strategy to grow the regional cities and their environs to reach critical level of settlement scales that will redress the current growth patterns, build stronger regions and accord with the national policy objectives, specifically NPO 2 (a) in the NPF.

In this regard it is considered that the settlement approach in the Core Strategy ~~should ensure that there are sufficient lands with suitable zoning objectives that can accommodate~~ should include for phasing and strategic reserve. This will demonstrate that the longer term spatial settlement strategy can ultimately accommodate housing for the targeted growth population for Galway City under the MASP that is an increase of **35,000** persons from the recorded population levels in 2016. This approach supports the policy interventionist approach as included for on both the NPF and the MASP. It has the added requirement under national and regional objectives that at least half (50%) of all these new homes targeted in the regional cities, which includes Galway City, should be accommodated within the existing built up footprint.

The delivery of much of the housing in the MASP strategic growth area of Ardaun LAP will require significant investment and only a portion is envisaged to be delivered during the currency of this plan. However it is necessary to recognize the longer term scenario that is included for in the regional and national planning strategies and is accordingly being embedded and aligned with strategic investment in the MASP area including that of the Galway Transport Strategy and Irish Water strategy. In addition the regeneration sites as shown in Table 1.8 will contribute to both the targeted number of housing unit delivery in the current plan period and for the longer, more strategic, period.

Omit table 1.8

	2016	2028 RSES High Growth Target
Population	78,668	106,664
Increase in Population	-----	27,996 (Annualised Population target)
Total Housing Stock	28,859	41,500 (adjusted for vacancy & obsolescence)
Housing Target 2016 – 2028	-----	12,641
Excluding CSO Housing Completions 2016 -2021*	1,397	11,244

~~Table 1.2 – Housing Target for Core Strategy using high growth scenario *Extrapolated to end of 2021~~

Settlement Capacity Audit

1.5.1. General

A Settlement Capacity Audit was undertaken in order to inform the preparation of the Core Strategy and to meet the specific requirements in relation to Section 10 2(A) (c) of the Planning & Development Act 2000 (as amended) with respect to areas zoned for residential use and a mix of residential and other uses. The purposes of preparing the audit was to analyse the existing capacity of the city to accommodate residential development ~~during the currency of the plan~~, identify and provide the basis

on which the future housing targets can be accommodated by category as identified in Table 1.8. This table also shows how these are to be allocated and specifically in accordance with Appendix 3 of the NPF NPO where these are classified as Tier 1 (immediately serviceable). Tier 2 (can be serviced fully in the period of the plan) and as previous referenced strategic reserve. A quantum has also been assigned to the housing likely to be delivered on other zoning also.

The preparation of the Core Strategy included for a comprehensive review of all existing residential zoned lands and lands zoned for a mix of residential and other uses. It was guided by the range of principles which reflected national and regional policy. These included the agenda on securing compact and sustainable growth.

In particular there was significant focus in the review on reusing previously developed “brownfield” lands, building up infill sites and redeveloping existing sites and buildings. These were examined in the context of existing and planned public transport provision infrastructure, the location of services, employment and community facilities. They were also reviewed in the context of specific site challenges. These sites are now classed in the Core Strategy as Regeneration and Opportunity Sites. In addition existing undeveloped residential lands were reviewed and also residentially zoned lands where infrastructure delivery may now permit higher densities. This approach also reflects the need to support a reduced carbon footprint. It also reflected the advantages where medium and higher densities can support improved local community services and facilities and sustainable transport links for daily journeys and in general have the capacity to transform vitality of place and contribute to improvements in lifestyle choices.

In addition to reviewing the zoning objective in relation to zonings that support residential development, cognisance was also taken of the capacity for housing yield anticipated in the Ardaun Local Area Plan 2018-2024. The preparation of this plan was driven by the need to give a framework to the urban extension of the city on lands designated for both settlement and development on the east side of the city. Development at Ardaun is anticipated to be delivered in two phases south and north where the dividing boundary is determined by the M6/N6 and delivery is allied to the service program for infrastructure.

Ardaun has a national designation as a Major Urban Housing Delivery Site (MUHDS), a designation which the Department sees as one of a number of strategic sites that could deliver housing of scale in the medium term. These lands have significant potential to meet housing need as targeted in the RSES and also have potential to fulfil the aims of an Urban Development Zone as provided for in Housing For All (2021) DHLGH. Overall the area is reliant on significant enabling infrastructural investment, elements of which are advancing and others at early planning stage such as Galway Strategic Drainage Study. The delivery of a portion of housing on Phase One, the southern section, is considered appropriate to be included in the calculation of yield potential for the currency of the 2023-29 City Plan. The timescale, roll out and co-ordination of delivery of critical infrastructure is such that it is anticipated that this sub phase of Phase 1 South Ardaun can be targeted to be delivered during the plan period with the balance to be sequenced in delivery with consequent plan periods.

1.5.2 Settlement Capacity Audit

The Settlement Capacity Audit calculated the undeveloped residential zoned lands at 137ha. These lands are all located within the existing built up footprint of the city and represent mainly consolidation of existing residential areas. The Plan proposes a very marginal change from the 2017-23 City Development Plan in the amount of new land zoned for high density residential purposes amounting to an additional 17ha which is included in the 137ha. This addition includes residential lands that had low/medium density zoning pocketed in the eastern suburbs but can now be fully serviced. In line with NPF and RSES and the need to deliver compact development and reuse of brownfield sites, these have been specifically identified and assessed for their potential capacity to deliver housing. This is reflected in the estimated potential yield that can be delivered on these key Regeneration and Opportunity Sites which can support a mix of uses including a significant scale of housing. These constitute 19 number of sites, the majority of which are brownfield in nature with 5 being classified as infill/windfall.

With respect to the undeveloped residential zoned lands the yield was established using policy guidelines as provided for in *Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities (2009)* and the *Galway Urban Density and Building Height Study* in combination with an audit of recent planning permission densities achieved on similar sites. Where site specific criteria was relevant and which impacted the suitability for housing this was factored into the estimation to ensure a level of robustness. This analysis showed 103 ha being included in Tier 1, 11ha in Tier 2 and 13ha of land challenged mainly by virtue of specific site characteristic but adjoining existing developed lands and appropriately sequenced in land use terms. The latter have been included in the strategic reserve.

The Regeneration and Opportunities Sites which number 19 in total were reviewed individually. They include lands suitable for a mix of uses with capacity for residential delivery. The identification of these sites included legacy regeneration sites from Galway City Development Plan 2017-23 and a number of additional sites. Many of these sites generally have spatial advantages such as close proximity to the city core, a location along an existing /planned high frequency bus route, good proximity and access to employment, services and amenities. Recognition of their relative suitability for development with a mix of residential use was factored into the assumptions applied at a site specific level in order to provide an estimation of yield. Where sites had the benefit of permissions for residential/part residential uses these were used in yield calculation. In general, otherwise an assumption of residential yield and density was arrived at which included application of recent densities achieved on comparable sites, site specific characteristics, and application of the *Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities (2009)* and the *Galway Urban Density and Building Height Study*. More specific detail with regard to each of these sites and the policy direction for delivery of uses including housing is outlined in Chapter 10.

The priority for development of these sites is guided by the MASP identification of regeneration sites as shown in Table 1.7. These include lands at Inner Harbour, Ceann Quarter, Headford Road Regeneration Area. These are targeted for housing delivery in the current plan period in addition to Sandy Road Regeneration Site (a collaborative venture driven by Galway City Council and the Land Development Agency) and Crown Square Regeneration Site which already has the benefit of permission for high density housing integrated and adjoining a large office campus under construction. It is anticipated that other smaller infill sites will also contribute to reaching the targeted population but are not of the same priority as the sites referenced as priority.

In advance of devising the Core Strategy an infrastructure audit was prepared in conjunction with stakeholders in relation to physical infrastructure availability. An assessment of capacity to service lands was carried out. This focused on facilities such as water supply, foul sewer drainage, surface water, public transport infrastructure, roads streets and footpaths. This was prepared to assess capacity for servicing new development and to accord with the tiered methodology approach in the NPF for the approach to classification of zoned land. More details of this strategic infrastructural assessment has been included for in Appendix 5.

Essentially Tier 1 are serviced lands in the built up footprint and Tier 2 are lands within the built up footprint or contiguous. An additional category relates to lands that can be described as Strategic Development Reserve lands – these can include lands that have potential to be developed over a timescale greater than the single six year cycle of the plan. In this regard the lands included in Phase 2 (North) of the Ardaun LAP would qualify as this strategic reserve, the subsequent delivery as identified for Phase 1 Ardaun LAP. These lands are not scheduled to be fully supported by infrastructure before 2029, but it is important that it is included to provide for a strategic settlement portion of NPF/RSES/MASP 2040 population delivery and for a longer term infrastructure investment guide. The potential population yield from Ardaun LAP Phase 2 however is not included in the Core Strategy settlement capacity for the current plan 2023-29 Plan. Table 1.9 gives a composite picture of lands zoned that can accommodate housing and includes a yield potential and a tiered servicing classification. This is supported by Figure 1.5 which shows the distribution of lands that has potential to deliver on the housing targets included in the RSES/MASP. The potential population yield from the staged delivery from the regeneration /opportunity priority sites as referenced and the non-prioritized regeneration/opportunity sites are considered to constitute approximately half of the estimated yield

capacity, the balance is classified as strategic reserve. These are reasonable assumptions having considered land use, property dynamics, likely sequence of uses and additional local factors.

Table 1.8 the Settlement Capacity Audit gives a composite picture of lands zoned and identified that zoned lands can accommodate the housing target of 4,433 for the period of the plan as identified in Table 1.4 and follows the methodology applied using the HNDA tool. It was considered prudent also to apply the concept of “headroom” provision as provided for in the NPF roadmap, the MASP and included in NPF “transitional population projections”. The application of this headroom allowance is an established feature in development plans and as referenced regarding the NPF roadmap allows for a transitional approach to deliver better alignment between plans at different levels. It is being used to ensure that there is sufficient zoned lands to meet the identified targeted housing needs and to allow for an element of choice and to recognize that the time gap that exists between grants of permission and construction which can result in delivery in subsequent plan periods. It also embraces the need for flexibility to ensure the long term sustainable supply of housing as envisaged in the national housing strategy - Housing for All.

Table 1.8 Settlement Capacity Audit

Zoning	Potential Development Yield Cumulative	Tier 1 / Yield	Tier 2/Yield	Strategic Reserve
R - Residential Zoned lands	5080	4120	440	520
Regeneration /Opportunity/infill	1590	1390	200	1,820
Ardaun Phase 1	500		500	1480
Ardaun Phase 2	2660			2660
LDR - residential zoned lands low density	60	60		

Omit Table 1.9 and replace with Core Strategy Table 1.9

Lands		Potential Development Yield	Zoning Tier
1	Residential Zoning (Consolidation of existing neighborhoods)	5,720	Tier 1
2	Regeneration and Opportunity Sites	3,411	Tier 1
3	Ardaun Phase 1	1,980	Tier 2
4	Ardaun Phase 2	2,660 <i>(excluded from Core Strategy calculations)</i>	Strategic Development Lands where Infrastructure servicing is anticipated to be post 2028.

Core Strategy Total for 2023-29	11,111 (total of 1,2, and 3)
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Table 1.3 Core Strategy Table 2023-29

1.5.3 Core Strategy Statement

The Core Strategy has been developed in line with the vision for Galway City as identified in the Strategic Goals. This focus envisions the city to sustainably develop, strengthen and nurture success, become a city of scale and continue to be driver of regional growth.

This vision includes for a settlement strategy that supports the city to transition to a low carbon, climate resilient city. This can be achieved by implementation of a compact growth approach, increased integration between land use and transportation, increased sustainable mobility and sustainable use and management of environmental resources.

There is a focus in the strategy to facilitate development within the strategic framework of the Galway Transport Strategy and to align employment and housing growth along existing and planned transport corridors. This will increase active travel, that is walking and cycling and usage of public transport.

To deliver on the compact growth approach, the strategy seeks to concentrate a significant amount of development that **is more than** half of all new homes within the built footprint of the city and thereby accord with sustainable principles and the NPF/RSES objectives. This will allow for efficient use of existing services, public transport and facilities and in some areas can lead to transformational change bringing additional footfall, new life and facilitate shorter, more sustainable journeys to employment, and recreation opportunities. Policy guidance included in the plan on housing densities and mix, building height, design and layout all contribute to achieving economic use of land and delivery of compact growth. These policies have evolved in conjunction with the outcomes of the Building Height and Density Study prepared as a supporting document for the plan and in line with Section 28 Ministerial Guidelines.

The approach to compact growth is further supported by an increasing focus on place making, public realm measures and enhancement of amenity and recreational opportunities. The delivery of these qualitative measures will be guided by the Galway City Public Realm Strategy and the Recreational Needs Study and its successor and General Urban Design Standards. It is a given that compact growth of itself will not deliver sustainable neighborhoods and the vision for the city is that the delivery of housing is balanced with the provision of community infrastructure which includes a range of critical facilities including good open space, recreation facilities, good transport options and appropriate social and community infrastructure.

The Core Strategy Table as provided in Table 1.9 provides for the housing supply targets specific to the plan period and also shows how these are aligned with the settlement strategy as stated to be one of consolidation of existing neighbourhoods, regeneration in particular of brownfield sites close to and located in the city centre and for strategic growth areas, all aligned with that as identified in the MASP.

In the interests of delivering compact growth the zoning of additional lands for residential use has been constrained, existing residential areas of the city will grow but through consolidation and modest densification. ~~These areas include the newer suburbs of Knocknacarra, Castlegar and Doughiska, where there are opportunities for additional local employment growth, services and facilitates and for improved public transport and active mode measures.~~ These areas **predominantly** include the suburbs of Knocknacarra, (Outer Suburbs West) Castlegar, Doughiska (Outer Suburbs East), where there **is existing opportunities** for additional local employment growth, **plans for additional investment** in amenity, services and facilitates and **planned investment** in improved public transport and active mode measures. **In general these residential areas are considered serviced. In infrastructural terms specific sites may require short extensions to services that are normally a consideration during the development management process.** There are deficits of services for some community needs not necessarily those provided by the local authority but sufficient land use zonings to generally

accommodate these are included for and identifying the deficit will be captured in the commitment in the plan to carry out community services audits.

The Core Strategy also recognises, in line with the NPF and RSES/MASP direction, the significant potential for a number of brownfield sites in the city to contribute to the delivery of housing. Major potential exists in particular at Ceannt Quarter, the Inner Harbour, Dyke/Headford Road area and at Sandy Road. The development of housing at these locations in conjunction with other mix of uses can improve the environment and revitalise and transform these to vibrant, living locations. Chapter 10 identifies these sites as Regeneration and Opportunity Sites and elaborates on the objectives for these sites that guides how they can contribute to the growth of the city while also complementing the character, sensitive environment, cultural legacy and built form of the city. Major potential exists in particular on the priority regeneration sites at Ceannt Quarter, the Inner Harbour, Headford Road, Sandy Road and Crown Quarter. The development of housing at these locations in conjunction with a mix of other uses can improve the general environment and revitalise and transform these areas to vibrant, living locations. The location of the priority sites in the neighborhoods of the City Centre and Inner and Established suburbs will contribute significantly to achieving the national and regional planning strategy particularly that as guided by NPO 3 (b), NPO 6 and RPO 3.6.2 and 3.6.4.

Chapter 10 identifies these sites as Regeneration and Opportunity Sites and elaborates on the objectives for these sites that guides how they can contribute to the growth of the city as a regional economic driver while also complementing the character, sensitive environment, cultural legacy and built form of the city. This accords with many national and regional objectives including NPO 4 and NPO 5 and with the ambitions of the MASP.

The main urban extension of the city at Ardaun, which is a main focus of the settlement strategy and an identified as a key enabler under the NPF strategic growth area in the MASP demanded detailed spatial guidance in the form of a Local Area Plan which was adopted in 2018. This area has potential to be a major new residential and employment settlement in the city. It provides a continuous link out from the city and is integrated with the transport strategy and capable of benefiting from planned investment in bus connects, active mode networks and commuter rail investment at Garraun. It will provide opportunities for high density residential development structured and co-ordinated with other essential community services. It is well placed to develop good employment opportunities having close physical links with the existing technology parks at Mervue, Ballybrit / Parkmore and strategic IDA sites at Oranmore and Athenry. It is also well placed to link in with and take advantage of the proximity of the higher level institution at GMIT and the significant health institutions at Merlin Park Hospital and the Galway Clinic.

Reflecting the recent years of low housing construction and a deficit of investment in infrastructure no housing has been constructed in Ardaun to date. Future delivery will be strongly linked to the stimulus needed from imminent additional infrastructural investment. Notwithstanding this, an implementation strategy to address these constraints is progressing. This included the preparation of an Area Based Transport Assessment (ABTA) for the LAP lands which supported applications for successful allocations under both rounds of Urban Regeneration Development Funding (URDF). This funding includes for an imminent the upgrade to the primary access to the southern section under construction which will provide bus priority, upgrades pedestrian and cyclist facilities and for the assessment of the location and design of an additional access route into the LAP lands. Design work by Irish Water was also carried out under the Irish Water Network Extensions and additional work is scheduled and has been commissioned by the Council. Design work by Irish Water has also been carried out under the Irish Water Network Extensions which will deliver capacity for a proportion of the overall development during the currency of the plan period by facilitating the Ardaun Wastewater Network Extension. Additional investment in a range of other infrastructure will be required also to enable full development of these lands in time and this will be sequenced with the longer term strategic settlement strategy focus of the MASP and NDP.

Lands at Murrough, although primarily designated for recreation and amenity purposes, will also sustain mixed uses including an element of housing and a significant delivery of amenity. This in time will service both the adjacent third level institute at GMIT and the existing and planned population on the east of the city. It is anticipated that an LAP will be brought forward during the currency of this

plan and that recreational facilities and infrastructure may be delivered but housing is ~~unlikely~~ not targeted in the period of this plan.

The Core Strategy has, as demonstrated in Table 1.9 ensured that sufficient lands are available to ~~meet the RSES/NPF targeted growth and need for the delivery of the associated demand for housing in the City including the allocation for the city MASP area~~ meet the targeted growth and allow for a reasonable level of additional provision and identify long term reserve lands

The lands available constitute a mix of consolidation of existing residential lands which has capacity to deliver 5,480 homes and the Regeneration and Opportunity Sites as shown in Figure 1.5. A review of the Regeneration and Opportunity Sites indicate a potential yield of 3,411 homes. To supplement this and ensure a readiness in the city to meet the ambitions for significant growth targeted in the RSES/MASP for Galway as a regional city Ardaun Phase 1 capacity yield of 1,980 is required for the period up to the end of 2028. It is considered that Ardaun Phase 2 will require infrastructure which is not committed to as of yet and can be classified as Additional Provision and support the continued realisation of the longer term RSES population targets for 2040.

~~As stated previously it is recognised that the potential yield can deliver more housing than what is included for in the ESRI and HNDA projections for delivery for the period up to the end of 2028. However this latter calculation represents a very conservative growth rate when viewed in the context of the NPF/RSES population targets up to 2031. Other factors are needed to be considered also when reviewing the settlement strategy for the city. The current proposal represents a minimal increase of 21.8ha in lands specifically zoned for housing from that which already exists in the City Development Plan 2017-23 plan and in the Ardaun LAP. A significant amount of the additional yield is anticipated to be delivered on the Regeneration and Opportunity Sites, all of which constitute brownfield sites located close to the city centre which can sustain in general a mix of uses with potential for high density compact growth. Notwithstanding that these are being brought forward in the current plan it is unlikely that they will all be delivered during the period of the plan. Development is likely to occur at a pace that reflects the proposed additional investment in public transport, public realm, services and the momentum of investment and the construction industry to gravitate towards new formats of development delivery. In view of this, it is considered that the approach to the settlement strategy for the city is appropriate from national and regional policy direction, from a land use, plan led perspective and also affords clarity to the general public and investment community.~~ deliver 5,080 homes. Regeneration/opportunity sites are recognised as having significant potential to contribute to sustainable compact growth, particularly those sites as prioritised in the MASP and Core Strategy. These sites are targeted to deliver up to 1,590 housing units during the plan period. Ardaun LAP area, as referenced, a strategic growth area is targeted to deliver 500 units during the currency of this plan. These targets have been aligned with the indicative neighbourhood areas as identified in Figure 3.1, showing the proportionate split between anticipated housing targets delivered from residential zoned lands and those identified as regeneration /opportunity (infill sites). There is an excess of 1,917 targeted housing units provided for over the quantum arrived at from the estimation of housing need demand assessment (Table 1.4). This has been allowed for in the context of a need for "additional provision". It is being used to ensure that there is sufficient zoned lands to meet the identified targeted housing needs and to allow for an element of choice and to recognize that the time gap that exists between grants of permission and construction which can result in delivery in subsequent plan periods

Table 1.9 Core Strategy Table

Location	Proposed Total Residential Unit Yield Y Est. pop capacity* P	Proportion of total residential unit yield attributed to Regeneration/Opportunity Sites	Area (Ha) of which is specifically Zoned R residential	

Outer Suburbs (West)	2070 (Y) 5175(P)	150 (Y) infill	48	
Outer Suburbs (East)	2060 (Y) 5,150 (P)	100 (Y) Opportunity /Infill	49	
Established Suburbs (West)	120 (Y) 300(P)	0	3	
Established Suburbs (East)	1,355 (Y) 3,387(P)	795 (Regeneration)	14	
Inner Residential Area	250(Y) 625(P)	250 (Regeneration)	0	
City Centre	295(Y) 737 (P)	295 (Regeneration)	0	
Ardaun	500(Y) 1,250 (P)	N/A	Portion of R zoned lands in LAP	
Galway City Total Housing Capacity Yield				6650
		Less estimated completions from Q.3 2021 – Q.4 2022**		300
		GCC Housing Targets Q.1 2023 to Q4 2028		6350
		GCC Housing Targets		

* Using an estimate of 2.5 per households noting that this not equivalent to population increase solely but also new household formations

** Estimated

Low Density Residential

The OPR acknowledges that many of the LDR zoned lands and LDR specific objectives are included in the existing Development Plan which predated the publication of the NPF, RSES and many of the section 28 ministerial guidelines and the current review provides an opportunity to reconsider a more sustainable approach to zoning for these lands, consistent with compact growth, a sustainable settlement and transportation strategy, and protection of the environment.

The OPR states that under section 10(2B)(8) of the Act, there is no presumption that any land zoned in a particular development plan will remain so in any subsequent plan.

The OPR considers that to continue to facilitate extensive low density housing into the rural hinterland around the city's fringe would undermine the potential of the city to deliver its 50% compact growth target in NPO 3b.

In relation to larger strategic sites, such as the LDR on the Tuam Road (c.19 ha) LDR at Briarhill (11 ha) there is no clear rationale for applying a significantly lower density to these lands, and development at such low density would result in further sprawl on the edge of the City.

Site specific constraints such as topography etc can be addressed through other policies to ensure that appropriate forms of development are ensured through the planning application process.

The Office also notes the recognition of the important role of the rural hinterland area at Section 5.2 of the draft Plan which states that '...Agricultural lands also contribute to the green network providing a natural backdrop to the city and supporting a diverse habitat' with their primary purpose in respect of open space type being 'Lands used for agriculture purposes, often forming greenbelt, offering amenity, passive recreation and visual aspect, contributing to biodiversity.' This is consistent with NPO 62 of the NPF to strengthen the value of greenbelts and green spaces. The inclusion of LDR zoning objectives in lands otherwise zoned agriculture ('A' or 'G') is, therefore, inconsistent with this objective.

In relation to the Environmental Report and NIR, the OPR advises a review of LDR zonings against the preferred development strategy (Sustainable Neighbourhoods) in the Environmental report, and the decision to screen out the need for appropriate assessment of the LDR in the NIR. Having reviewed the areas zoned LDR in the draft Plan, the OPR has identified a significant number cases where the zoning objective would be contrary to national and/ or regional policy.

Recommendation 5 – Low density residential zoning objectives

Having regard to the NPO 3b and NPO 62 of the NPF, policy 1.4 of the draft Plan to ‘Support the compact growth of Galway City through appropriate policies that promote co-ordination between land use and locations that can be served by public transport and the walking and cycling networks and enables the delivery of 50% of all new homes within the existing built footprint on lands as set out in the Core Strategy’, and the Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) Guidelines for Planning Authorities (2009), the planning authority is required to review the approach to ‘LDR Low Density Residential zoning’ and to omit:

- (i) LDR zoning objectives where land is located within, or contiguous to the existing built up footprint of the City and which is served by existing and/ or proposed public transport corridors, where development at such low densities would be contrary to compact growth, and the densities set out in the Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) Guidelines for Planning Authorities (2009). For example, Figure 11.18 Tuam Road, 11.16 Briarhill.
- (ii) Isolated LDR zoning objectives in areas otherwise zoned ‘A Agriculture’ or ‘G Agriculture and High Amenity’ which contain their own objectives and criteria in respect of rural housing. For example, Figure, 11.20 Ballindooley, 11.19 Carraig Ban, 11.26 and 11.31 in the Coolagh area, 11.29 Quarry Road Menlo and two further sites on Monument Road Menlo, Figures 11.27 and 11.28 in the Castlegar area, and 11.24 and 11.30 in the Roscam area which is also adjacent to the Galway Bay SAC and SPA complex.
- (iii) LDR zoning objectives in areas which are unserviced with an existing high concentration of on-site wastewater treatment adjacent to areas of very high environmental sensitivity such as the Galway Bay SAC and SPA. For example, Figures 11.10, 11.11, 11.12, 11.13, and 11.14 in the extended Roscam area and Figure 11.25 Murrough.
- (iv) Associated policy objectives relating to Low Density Residential Areas, including Policy 3.8.1 and 3.8.2.

Chief Executive's Response

Galway City carries a legacy of a significant boundary extension as provided for under the Local Government (Reorganisation) Act 1985 as implemented in 1986. Included within the boundary expansion were historic clustering patterns of development, some more recent defined villages and also a disparate patterns of housing. Some others nodes are reflective and an acknowledgement of more recent development since the 80’s including schemes granted generally on unserviced lands.

The majority of LDR zoning facilitates some recognition of these clustering nodes. In general as referenced many of the areas are a legacy of historic village and settlement areas – Castlegar, Ballindooley, Menlough, Roscam, Coolagh, Parkmore, Murrough- evidenced by patterns of housing, some with clachan typologies, some hosting vernacular housing, some having pre -1800 provenance. Many of these can be considered as having a defined character, sensitive environments from an historical, archaeological and or natural heritage perspective as recognised in Section 3.8 of the DCDP. For the most part, these lands do not have the benefit of full services, nor modern road networks or existing or planned public transport investment that can sustainably support higher densities. Some also currently abut and are impacted by the N6 GCRR reserved route.

It is accepted that these are supporting lower densities as a result of this historic organic growth which reflects the expansion of settlements, their particular environmental sensitivities, service challenges and also some legacy of Member’s decision – making as provided for as a reserved function under legislation. It is argued that these established patterns need some directional policy such as that provided for in the objectives relating to the LDR which focuses on infill and not further expansion. This affords a transitional approach which restrains this form of development and ultimately will over a number of development plan cycles render this spatial approach unnecessary. In this regard it is not deemed appropriate to omit this zoning in the DCDP. However in the interim it is considered that a

stronger policy regarding the environmental sensitivities should apply where infill is under consideration. This overall approach reflects an element of what is acknowledged in the Draft Planning Guidelines as the need to balance national policy with an “understanding and analysis of the local context of the area” Section 1.3.

Having considered the recommendations of the OPR it is considered that the DCDP should include for a number of amendments. For the established LDR nodes, sensitive infill can be open for consideration where all relevant environmental sensitivities and other standard development management criteria forms part of this assessment, have been examined as provided for in Section 3.8.

While tempering the extent of such land use zonings allows for appropriate infill and consolidation, it is also considered that in line with the OPR recommendation that the larger banks of such LDR where there is no legacy of settlement nodes, no extant permissions, no advancing development, that these lands should be reviewed to accord with pursuance of the NPF compact, sustainable growth agenda. Some specific exceptions to this approach have to be considered on the basis of prudence so as to have regard to their current context as set out below.

Where the potential for infill will materialise it will, as included for in the amended Core Strategy yield table 1.8 reflect a potential increase that will not impact greatly on the overall objective for compact growth. As previously stated in response to OPR recommendation 4 the housing target for the DCDP will be substantially delivered in the footprint of the built up area, far exceeding the 50% target as provided for in NPO 3 (b) as is already happening and evidenced by previously referenced recent (May 2022) RSES implementation analysis with respect to NPO 3 (b) and RPO 3.1.

Specifically regarding lands zoned for LDR on the Tuam Road Figure 11.18 it is recommended to retain the current zoning. As these lands are substantially the subject of CPO proceedings, associated with the N6 GCRR project and are on hold owing to high court proceedings it is currently inadvisable to alter the land use zoning which influences the CPO and associated processes. In the event that the challenge to the N6 GCRR is successful the zoning of the lands can be re-reviewed and facilitated by variation pursuant to section 13 of the Planning Act. This approach also accords with the advice of the project proponents TII / Galway Co. Council. In the event that the challenge is not successful the strategic objective regarding the N6 GCRR as provided for in the DCDP prevails.

With respect to lands at Rosshill figure 11.12 and figure 11.13. The capacity to service these LDR lands is linked to services investment particularly that of Irish Water, which is scheduled to be commissioned during the currency of the DCDP. Predicated on the phased delivery of these services An Bord Pleanala granted permission for an SHD development ref. TA61.310797 on a phase 1 portion of these lands for 102 units. The consent for such development is the subject of judicial review proceedings. It is considered as that there is now high court proceedings in progress in which the policy and zoning objectives in the current plan are under consideration, any alteration at this stage could be perceived to render the court proceedings moot and constitute an interference with the rights of litigants. Notwithstanding this, it is considered that any change to the land use zoning has capacity to be facilitated by variation pursuant to section 13 of the Planning Act, following the delivery of judgement by the courts.

In relation to lands at Castlegar as referenced by figure 11.27 and 11.28, these lands are proximate to the route reservation for the strategic orbital route the N6 GCRR which also has support in the RSES and NDP. Construction of the route will require the demolition of 44 houses and acquisition of a further 10 as is included for in the confirmed CPO process. A significant concentration of those affected is in the Castlegar /Ballindooley area where there is a well-established community. The LDR zoning in this area has capacity for a limited level of housing that can afford some opportunity for options for re-housing those displaced by the strategic road scheme and/or an option to re-solidify the Castlegar village area which is anchored at this location by a primary school with an enrolment of over 100 pupils.

As recommended by the OPR, it is proposed to amend lands included in Figure 11.26 LDR/RA Coolagh; LDR Figure 11.16 Briarhill; and LDR Lands at Cappagh (4.6ha) to **A** and **G** agricultural zoning.

Regarding the balance of lands and referenced figures it is noted that there are already legacies of well-established settlement within these nodes and/or advancing developments supported by extant permissions. The objective here as referenced will be to allow sensitive infill where appropriate.

It is also recommended that in order to reflect the thrust of the NPF with regard to density that the land use zoning should omit reference to “low density” and be re-classed as Residential R2 -. It is also considered that this zoning classification will broadly include for the range of nodes as previously described and acknowledge that sensitive infill may be open for consideration subject to not having a significant negative impact on the environmental sensitivities in the area and where such infill will not significantly detract from the character of the area, the historic significance where relevant, and where such infill can be safely accommodated on the road network.

Recommendation 5 (i), (ii), (iii) and (iv)a number of proposed amendments are recommended and the CE response has been furnished regarding other issues raised.

5 (i) this recommendation has been reviewed and it is recommended to propose an amendment regarding the LDR zoning objective in description, to provide for more clarity as to the direction of development and type and to link and assessments for infill on lands to specific criteria including the plan policy as provided for in 5.2 relating to sites of European, National and local Ecological significance.

It is proposed as recommended by the OPR to amend land use zoning on a number of the LDR lands to an **A** and **G** land use zoning, these generally consist of large banks of land, where there is no legacy of settlement nodes within them, no extant permissions, no advancing development. In particular this relates to lands at Briarhill; lands at Coolagh; Lands at Cappagh;

Commentary regarding the specific status of other large land banks is as referenced in the CE response and applies to other lands where it is not deemed appropriate currently to make any changes to land use zonings for stated reasons but where the relevant zones can be re-reviewed and brought forward as variations pursuant to section 13 of the Planning Act following delivery of court judgements.

5 (ii) It is considered that where there is a historic legacy of settlement nodes, contained boundaries, extant permissions, associated advancing development that relevant LDR zoning as per proposed amendments should be retained for these lands. For the established LDR nodes, sensitive infill can be open for consideration where all relevant environmental sensitivities and other standard planning assessments have been examined as provided for in Section 3.8. At the OPR suggestion it is proposed to amend and omit all figures 11.10 to 11.31 and to include some reference to these solely in text as specific development objectives.

5 (iii) It is considered that proposed amendments to Section 11.2.8 regarding the LDR zoning objective will provide for more clarity on potential infill on lands and also to the direction of development type and link specific criteria including the plan policy as provided for in 5.2 relating to sites of European, National and local Ecological significance which derived from the SEA/NIR assessments.

5(iv) As is referenced, the approach to LDR has been reviewed and associated objectives and policy proposed to be amended.

Chief Executive's Recommendation:

Amend Section 11.2.8 Residential R and Low Density Residential LDR Land Use Zoning Objectives and insert text in **green** and delete text with **strikethrough** as follows:

11.2.8 Residential R and Low-Density Residential R2 LDR Land Use Zoning Objectives

Zoning Objective R

To provide for residential development and for associated support development, which will ensure the protection of existing residential amenity and will contribute to sustainable residential neighbourhoods.

Zoning Objective LDR Residential R2

~~To provide for low-density residential development which will ensure the protection of existing residential amenity.~~

To provide for sensitive residential infill where such infill will not have an impact on the environmental and visual sensitivities in the area, including those in particular the subject of Policy 5.2 and where such infill can be assimilated satisfactorily through design, layout and amenity impact in a manner that does not detract from the character of the area.

Uses which are compatible with and contribute to the zoning objective, for example	<ul style="list-style-type: none"> – Residential – Residential institution – Outdoor recreational use – Accommodation for the Traveller Community – Local shops, local offices, licensed premises, banks and other local services – Buildings for education – Childcare facilities – Buildings for the care of the health, safety or welfare of the public – Buildings for community, cultural or recreational use
Uses which may contribute to the zoning objectives, dependent on the R and LDR Residential R2 location and scale of development, for example:	<ul style="list-style-type: none"> – Hotel, Guesthouses, Hostels and B&Bs – Part conversion or extension of private residence to home office, childcare facility or small enterprises by the occupier of the dwelling, at a scale as would not unduly interfere with the primary use of the dwelling or prevailing residential amenity – Places of worship – Public utilities

Amend Section 11.2.8 Specific Development Objectives for a number of LDR lands to insert text in green and delete text with strikethrough as follows:

The following are specific development objectives for a number of LDR Residential R2 zones throughout the city:

- LDR Residential R2 lands at Coolagh Road, opposite Crestwood. Development shall be limited to one house only.
- LDR Residential R2 lands at the junction of Gentian Hill. ~~Development on these lands shall not exceed a density of 13 houses per hectare and shall be restricted to single-storey dwellings.~~ One house only shall be open to consideration on the remainder of the undeveloped lands. The design of the development shall have a low profile ridge line which shall not exceed the ridge height of the adjoining development to the east.

- LDR Residential R2 lands comprising of approximately 0.47 hectares at Quarry Road, Menlo north of Menlo village end. Development shall be limited to one house only.
- ~~LDR lands comprising of 4.68 hectares at Cappagh Road, Cappagh. Development of these lands shall generally have a maximum density of 2.5 houses to the hectare.~~
- Residential R2 Roscam Pitch & Putt and adjacent lands /Rosshill House and adjacent lands. The maximum plot ratio density of 0.2:1 shall only be considered following agreement on an overall layout of the area. The layout will have regard to the sylvan character of the site and where appropriate the protection of the existing trees and Roscam Folly. Development will be phased in accordance with Irish Water capacity and program for investment.
- Residential R2 lands at Ballindooley - Council owned property. A portion (0.29 ha) shall be reserved for the provision of community, recreational, educational and heritage facilities and car parking relating to these facilities.
- Residential R2 lands at Roscam, south of the Coast Road. Development shall be restricted to one house only, reserved for the use of immediate family members.
- Residential R2 lands at Castlegar, to the east of Castlegar NS. Development shall generally have a maximum density of 2.5 houses to the hectare. Any development shall be consistent with the N6 GCRR Strategic Road.
- Residential R2 lands at Castlegar to the north west of Castlegar NS. Development shall be restricted to three houses only, reserved for the use of immediate family members of the landowner. Any development shall be consistent with the N6 GCRR Strategic Road.
- Residential R2 lands east of Quarry Road, Menlough. Development shall be restricted to one house only, reserved for the use of immediate family members of the landowner.
- Residential R2 lands at Roscam Village. Family lands defined as site A and site B in details submitted in planning application reference 18/44. Development shall be restricted to two houses only, reserved for the use of immediate family members of the landowner.
- Residential R2 lands at Roscam Village. Lands defined by planning application reference 20/345 and the adjoining Residential R2 lands to the north. Development shall be restricted to two houses only, reserved for the use of immediate family members of the landowner.
- Residential R2 lands west of Coolagh Road opposite Carraig Ban. Development shall be restricted to one house only, reserved for the use of immediate family members.

Amend Section 11.2.8 Specific Development Objectives for a number of LDR lands to omit small maps and delete text with strikethrough as follows:

~~The following lands zoned LDR have the following specific development objectives, subject to design, environmental assessments, water and wastewater services and traffic safety. Communal open space and recreational facilities may be a requirement in certain circumstances:~~

Fig 11.10 Curragreen LDR



- Development shall generally have a maximum density of 5 houses to the hectare.
- Where possible hedgerows and stone walls shall be retained, and supplemented by appropriate landscaping.

Fig. 11.11 LDR Old Dublin Road



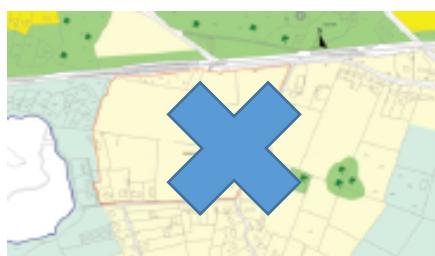
- Development shall generally have a maximum density of 5 houses to the hectare.
- House design shall be single storey, dormer or have a low profile ridge line.
- Where possible hedgerows and stone walls shall be retained.

11.12 LDR Rosshill House and adjacent lands



- The maximum plot ratio density of 0.2:1 shall only be considered following agreement on an overall layout of the area. This layout will have regard to the areas zoned RA, the tree coverage, the existing pillars and stone walls.
- Development will only be considered where it accords with strategic main drainage proposals.

Fig. 11.13 LDR Roscam Pitch and Putt and adjacent lands



- The maximum plot ratio density of 0.2:1 shall only be considered following agreement on an overall layout of the area.
- This layout will have regard to the sylvan character of the site and where appropriate the protection of existing trees and the Roscam Folly.
- Development will only be considered where it accords with strategic main drainage proposals.

Fig. 11.14 LDR Roscam Village



- Development shall generally have a maximum density of 5 houses to the hectare.
- Where possible hedgerows and stonewalls shall be retained.
- Protected views shall be preserved and shall have regard to the protected status of existing archaeological structures.

Fig. 11.15 LDR Doughiska



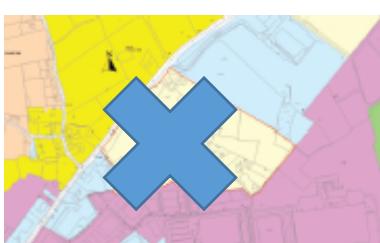
- Development shall generally have a maximum density of 5 houses to the hectare.
- Where possible existing hedgerows, trees and stonewalls shall be retained.
- Any development shall accord with all GTS proposals.

Fig. 11.16 LDR Briarhill



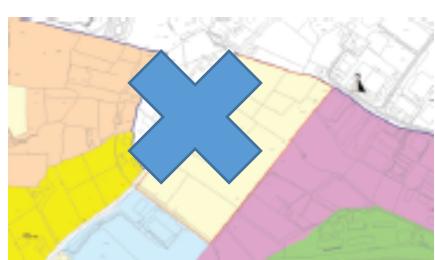
- A maximum density of 5 houses to the hectare shall only be considered following agreement on an overall layout of the area.
- Development shall be low profile single storey with a maximum ridge height of 5.5m above existing ground floor level.

Fig. 11.17 LDR Parkmore



- Development shall generally have a maximum density of 5 houses to the hectare.
- Where possible hedgerows and stone walls shall be retained.

Fig. 11.18 LDR Tuam Road



- Development shall have a maximum density of 5 houses to the hectare and shall only be considered following agreement on an overall layout of the area and shall be consistent with the N6 GCRR designed strategic road corridor.
- Residential development on the higher slopes shall, by means of layout and design, assimilate into the topography of the site and protect the ridge view.

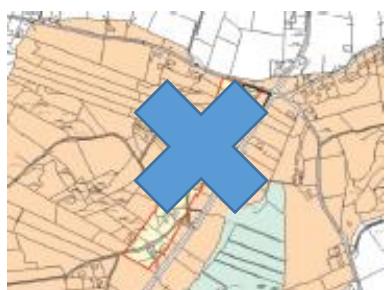
- ~~Development will only be considered where it accords with strategic main drainage proposals.~~

Fig.11.19 LDR Carraig Ban



- ~~Any infill development or extensions shall have regard to the existing pattern of development.~~

Fig.11.20 LDR Ballindeeley



- ~~In order to maintain the established character of the area, development shall generally not exceed a density of 5 houses to the hectare.~~
- ~~Where possible hedgerows and stone walls shall be retained.~~
- ~~The site outlined in black (0.29 hectares) shall be reserved for the provision of community, recreational, educational and heritage facilities and car parking relating to these facilities.~~

Fig.11.21 LDR Chestnut Lane and Barnacranny



- ~~Development shall generally have a maximum density of 2.5 houses to the hectare.~~
- ~~Where possible hedgerows and stone walls shall be retained.~~
- ~~On Site A, an exception shall apply where a maximum density of 5 houses to the hectare shall be considered. Any development on Site A shall assess and take into consideration the ecological importance of these lands.~~

Fig.11.22 LDR at Circular Road



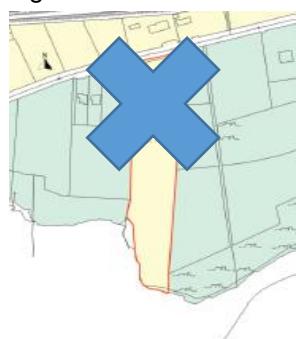
- ~~Development shall generally have a maximum density of 5 houses to the hectare.~~
- ~~Where possible hedgerows and stone walls shall be retained.~~
- ~~Development on Site A (0.5 hectares): A maximum of 3 houses shall be open for consideration on this site~~

Fig.11.23 LDR Ballagh



- Development shall generally have a maximum density of 5 houses to the hectare.
- Where possible hedgerows and stone walls shall be retained.

Fig. 11.24 LDR Rescam: Coast Road



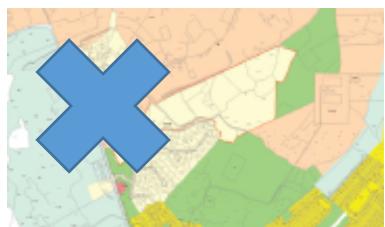
- Development shall be restricted to two houses only, reserved for the use of immediate family members.
- Development shall have regard to the existing pattern of development and the visual and environmental sensitivity of the site.

Fig. 11.25 LDR Murrrough



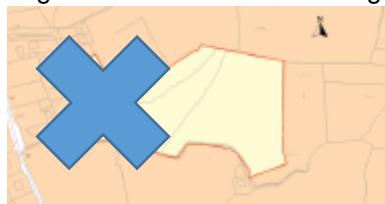
- Development shall have a maximum density of 5 houses to the hectare.
- Development shall have regard to the existing pattern of development and shall be subject to amenity and environmental considerations.

Fig. 11.26 LDR Coolagh



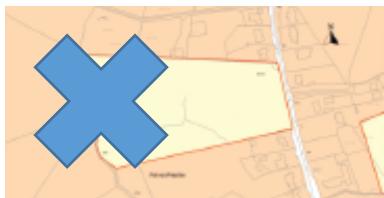
Development shall generally have a maximum density of 2.5 houses to the hectare.

Fig. 11.27 LDR East of Castlegar NS



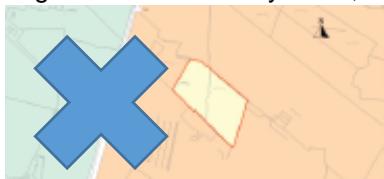
Development shall generally have a maximum density of 2.5 houses to the hectare.

Fig. 11.28 LDR Castlegar Road, Castlegar



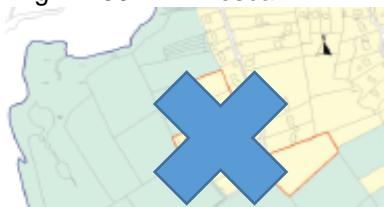
~~Development shall be restricted to three houses only, reserved for the use of immediate family members of the landowner. Any development shall be consistent with the N6 GCRR designed strategic road corridor~~

Fig. 11.29 LDR Quarry Read, Menlo



~~Development shall be restricted to one houses only, reserved for the use of immediate family members of the landowner.~~

Fig. 11.30 LDR Rescam



~~Development on each site outlined in red shall be restricted to two houses only, reserved for the use of immediate family members of the landowner.~~

~~Development on each site shall be restricted to two houses only, reserved for the use of immediate family members of the landowner.~~



Fig. 11.31 LDR West of Coolagh Road, Coolagh

~~Development shall be restricted to one houses only, reserved for the use of immediate family members of the landowner.~~

Amend Section 3.8 and Policy 3.8 Low Density Residential Areas and replace text with amended section 3.8 and amended Policy 3.8

Section 3.8 Residential 2 Areas

Residential 2 areas (R2) are areas generally on the periphery of the city with legacies of clustered patterns of low density development, which evolved over time from historic, more dispersed forms of settlement owing to deficiencies in service provision, deficiencies in the road network and also due to environmental, visual and built heritage sensitivities. Many of these can be considered as having a defined character, sensitive environments from an historical, architectural, archaeological and or natural heritage perspective. Although they don't reflect the best form of sustainable development, having evolved over time and prior to current national and regional policy direction they still have potential within their nodal settings for sensitive infill and consolidation that can contribute somewhat to compact growth. This will be determined by the planning authority on relevant suitable sites, subject to full assessment, where the impact on the environmental and visual sensitivities in the area, including those in particular the subject of Policy 5.2 are integral part of any assessment for suitability.

Policy 3.8 Residential 2 Areas

1. Facilitate sustainable infill but only where such development can be provided having regard to any environmental vulnerability, services capacities, and where development can be assimilated satisfactorily through design, layout and amenity impact in a manner that does not detract from the character of the area.
2. Ensure assessment of any developments complies with Policy 5.2 in relation to the protection of sites of European, National, and Local Ecological Importance.

Amend land Use Zoning Maps to provide for a change in land use zonings on these lands for the following locations as identified on proposed amendment maps

Amend land use zoning objectives at Coolagh on lands defined by the red boundary in Figure 1.0 hereunder from current draft plan proposed zoning **LDR** and **RA** to **A**

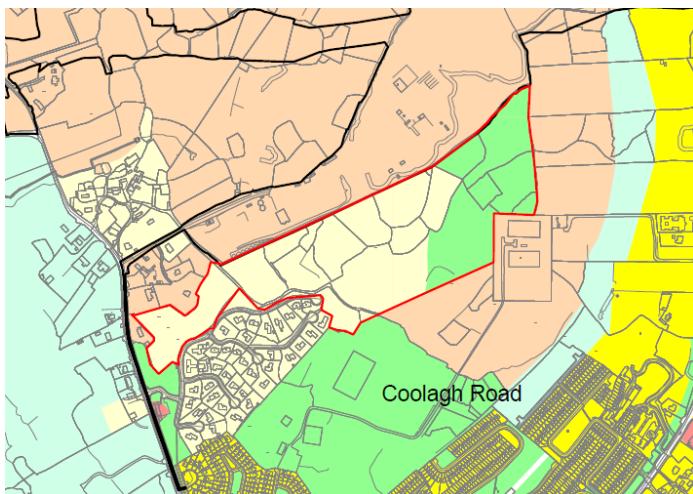


Figure 1.0

Amend land use zoning objectives at Briarhill on lands defined by the red boundary in Figure 1.1 hereunder from current draft plan proposed **LDR** to **G**

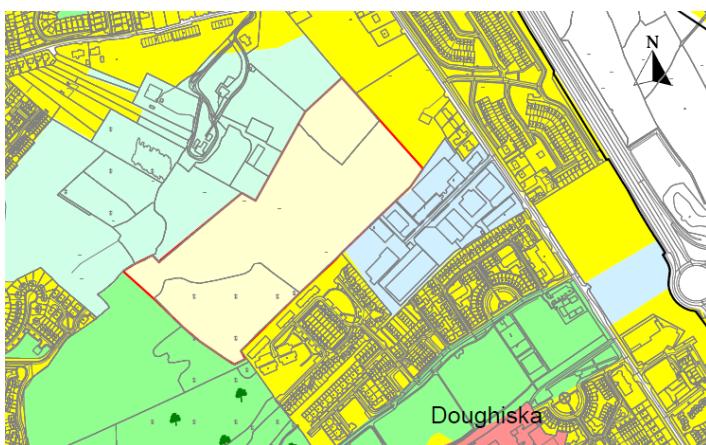


Figure 1.1

Amend land use zoning objectives at Cappagh on lands defined by the red boundary in Figure 1.3 hereunder from current draft plan proposed LDR to A

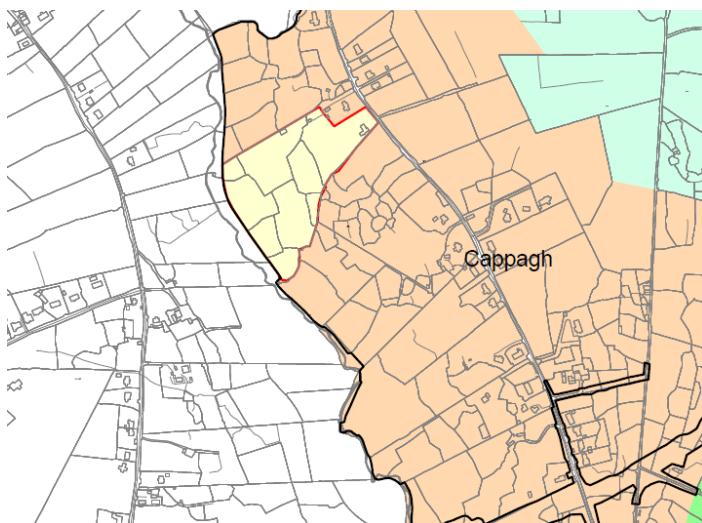


Figure 1.3

Development Management Standards

Specific Planning Policy Requirement (SPPR) 1 of the Urban Development and Building Heights Guidelines for Planning Authorities (2018) requires that statutory plans identify areas where increased building height will be actively pursued.

The OPR considers that the maximum height range in the city centre district be reviewed having regard to the need to deliver on key NPF objectives for compact growth, and the potential for key landmark buildings in appropriate locations such as the larger regeneration sites.

In order to provide clarity and transparency at planning application stage, the OPR considers that the density guidance and standards contained in the supporting publication Galway Urban Density and Building Height Study (2021), should be included in the draft Plan as statutory objectives, and should be consistent with the section 28 Guidelines on Sustainable Residential Development in Urban Areas (2009) and Circular NRUP 02/2021 Residential Densities in Towns and Villages which support national and regional policy objectives for compact growth

Recommendation 6 - Development Management Standards

In accordance with section 10(2A)(a) of the Planning and Development Act 2000, as amended, and having regard to NPO 3, 6, 13 and 35, the planning authority is required to:

- (i) provide relevant information to show that the draft Plan is consistent with the Specific Planning Policy Requirements (SPPRs) specified in the Urban Development and Building Heights Guidelines for Planning Authorities (2018) by more fully demonstrating consistency with SPPR 1; and
- (ii) provide relevant information to show that the draft Plan includes residential density standards fully consistent with the residential densities set out in the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2012) and Circular NRUP 02/2021 Residential Densities in Towns and Villages.

Chief Executive's Response

In relation to building height in the city, the Urban Density and Building Height Study (UDBH) was prepared in the context of reviewing the application of Section 28 Ministerial Guidelines Urban Development and Building Height Guidelines (2018) to Galway City. The UDBH study is a comprehensive integrated study which considered the capacity of areas to accommodate increased density and height based on a range of criteria.

This included scope for regeneration and consolidation, proximity to service centres and the green network, access to sustainable transport and scope to achieve carbon reductions. This approach has taken account of the suitability and sensitivity of different areas to change and the need to respect the unique built and natural heritage and character of the city including the historic city core. In this regard, it is considered that the study is a supporting guidance document which should be considered in its entirety as opposed to extracting just the development guidance elements. The study sets out a range of development guidance for different character areas in the city which need to be considered in the context of the suitability and sensitivity to change approach in the study. The draft plan states in chapter 8 that *suggested ranges of scale and intensity are a guide and are not absolute measures to be pursued or achieved and each site should be considered on its merits. Densities and heights lower or higher than those outlined in the study may be appropriate when assessed against other relevant policy and guidance.* As such it is not considered appropriate to extract the development guidance for each area that was reviewed and include as statutory objectives in the draft plan as this doesn't allow for full contextual analysis.

The entire study is a supporting guidance document which will assist in achieving appropriate density and height, give direction to the policy framework of the DCDP and support the development management process. This is reflected in Policy 8.7 of the DCDP which includes reference to *adhere to the Galway City Urban Density and Building Height Study (2021) and promote development which incorporates high quality sustainable and inclusive urban design, urban form and architecture that positively contributes to the city's character, heritage and neighbourhood areas.*

With regard to identifying areas where height will be actively pursued, the direction of the UDBH and the DCDP is to consider height on a case by case basis recognising the many factors or criteria that require consideration and assessment but while also having the strategic guidance from the UDBH study. The DCDP in Chapter 8 states that *large sites may support opportunities for exceptional forms of development, this will be where their built form, their social, economic and environmental impact can deliver excellence. Where sites of scale are capable of generating their own character, scope for greater height may be open for consideration where this additionality can demonstrate justification based on outstanding architectural design and satisfy all other planning considerations.*

The UDBH study identifies that areas which would have potential to create their own character and be able to assimilate greater densities are the large scale strategic regeneration sites. This is reflected in policy 3.3 Sustainable Neighbourhood Concept which includes to encourage *higher residential densities at appropriate locations as guided by the Galway Urban Density and Building Height Study (2021). Such locations include strategic Regeneration and Opportunity Sites, and residential and mixed use zoned sites located close to public transport routes and routes identified in the Galway Transport Strategy as suitable for high frequency, public transport services.*

Regarding recommendation 6 (i) a number of amendments are proposed to give greater linkage in the plan to the Galway Urban Development and Building Height Guidelines. These proposed amendments can be provided for in Chapter 8 and Chapter 11.

Regarding recommendation 6(ii), this requires that the DCDP includes residential density standards to be fully consistent with the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (DECLG, 2009). In this regard it is noted that the 2009 guidelines are referenced throughout the DCDP. In particular in relation to densities, the DCDP considers plot ratio as the most appropriate mechanism for calculating density in an urban context reflecting floor area extent as opposed to units per hectare. This allows for greater emphasis to be placed on achieving a mix of types and unit sizes rather than just unit quantities and better reflect emerging needs. It is also

considered a better measurement when considering mixed use developments. In relation to the specific plot ratio of 0.46 for residential development, it is considered that this can be removed and replaced by density standards as set out in the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (DECLG, 2009).

To align with the SRD guidelines a number of amendments are also proposed.

Chief Executive's Recommendation

Amend Section 8.8 Urban Design and Placemaking, paragraph titled Urban Density and Building Height to omit text (strikeout) and include for additional text as shown in green

Urban Density and Building Height

...Large sites may support opportunities for exceptional forms of development, this will be where their built form, their social, economic and environmental impact can deliver excellence. Where sites of scale are capable of generating their own character, in particular at the Ceannt Quarter, Inner Harbour and Headford Road Regeneration Areas, scope for greater height ~~may be~~ is open for consideration where this additionality can demonstrate justification based on outstanding architectural design and satisfy all other planning considerations. In general, the capacity for height will be assessed in conjunction with the development guidance set out in the Galway Urban Density and Building Height Study (2021) Section D Spatial strategy.

Amend Chapter 11 Part B Development Standards by adding an additional subsection under- General Development Standards and Guidelines. New text in green

Urban Development and Building Height

With respect to building height, developments shall specifically have regard to the Galway Urban Density and Building Height Study (2021) which sets out the framework for density and building height in the city. Part D Spatial Strategy outlines the potential for appropriate building densities and heights for new development in each geographic zone and sub zone of the city.

Amend Section 11.3.1 (a) General (to note that this has a sequential effect for other residential areas as per section 11.3.2, 11.3.3 and 11.3.4.) to omit text (strikeout) and include for additional text as shown in green

Except where the Design Standards for New Apartments - Guidelines for Planning Authorities 2020 apply, generally a plot ratio of 0.46:1 for new residential development shall not normally be exceeded. residential density shall accord with the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (DECLG, 2009). Consideration for a higher plot ratio for higher density development will only apply where developments include for exceptional design and demonstrate high sustainability principles and where existing residential amenity is protected.

Amend Section 11.7.1 Plot Ratio to omit text (strikeout) and include for additional text as shown in green

In the lands zoned 'R' and directly adjoining Toft Park a relaxation of the maximum plot ratio figure of 0.46:1 may be considered residential density shall accord with the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (DECLG, 2009). Maximum densities shall be achieved only where the other residential amenity standards have been complied with, and where the development is of a scale and height appropriate to its high profile setting.

Galway Metropolitan Area – Co-ordination with Galway County Council

Collaboration and co-operation between Galway City Council and Galway County Council in terms of their spatial plans will be crucial in terms of prioritising investment in infrastructure and delivering on the vision for Galway set out in the MASP.

The OPR considers that the draft Plan provides the opportunity to co-ordinate the objectives for the MASP.

The OPR considers that there is a need for more detailed co-ordination in terms of the integration of land use and transport policies for the connected metropolitan settlements of Ardaun, Gaurran, and Briarhill. In this respect, the Office has concerns as to whether the use of a non-statutory framework plan is an appropriate vehicle to guide the development of such an extensive land bank in a MASP location.

Consideration should be given to the preparation of a Joint Local Area Plan, which would provide for detailed consideration of infrastructure capacity or constraints and their resolution, and better integration of sustainable transportation (not only rail, but also bus, cycling and walking modes).

Recommendation 7 – Co-ordination with Galway County Council

Having regard to section 9(4) of the Planning and Development Act 2000 (as amended) and to the requirement for a sustainable settlement and transportation strategy under section 10(2)(n), the planning authority is required to coordinate the objectives of the development plan with those of Galway County Council to:

- (i) review land use zonings on the edge of and contiguous to the boundary of the city council in accordance with the principles of compact growth; and sequential approach to development, and tiered approach to zoning; and
- (ii) prepare a joint Local Area Plan or at the least a joint strategy to form part of the draft Plan, including a transport strategy and/or local transport plan for the connected metropolitan settlements of Ardaun, Gaurran (County) and Briarhill (County). This should also involve engagement with all other relevant stakeholders, particularly TII, NTA, IW, and OPW.

Chief Executive's Response

Re Recommendation 7 (i) – Co-ordination with Galway County Council

The local authority acknowledges the importance of coordination of the city and the city environs which essentially constitutes the MASP area. The authority is of the opinion that there is also a statutory structure in place adopted through the RSES process that is to provide for a strategic planning and investment framework in this area. It is considered that this approach which encompasses all of the environs not just the eastern area alluded to, is the best spatial approach and includes for co-ordination with all peripheral settlements including Bearna and the impact of the north western area towards Moycullen.

The city plan has an approach in general on the periphery of the city for restricted growth through land use zoning for A, where development is limited to local need, only where substantiated need is a qualifier with restricted conditions subsequently applied in accordance with S.28 planning guidelines – similar somewhat to that in the county plan. There is also substantial provision for G and RA where development, unless of an agricultural or amenity nature is generally prohibited.

Exceptions to this are at the eastern boundary Parkmore – IDA, industrial zoned lands straddle the jurisdictional boundaries of both authorities. In addition the eastern interface accommodates the urban extension of Ardaun for which there is a statutory LAP, a strategy supported in the NPF and RSES.

The approach in the city plan reflects a sequential approach to planning, where development is structured under the settlement strategy, accommodated on the boundary interface at Ardaun LAP which includes for policies that encourage compact sustainable development. It also supports a shared development strategy for industrial land on the NE of the city and includes for the associated strategic needs and investment approach at this location.

Re Recommendation 7 (ii) – Co-ordination with Galway County Council

The local authority would not consider it necessary nor appropriate for to prepare a joint Local Area Plan for the area edge of and contiguous to the boundary of the city. The authority is of the opinion that there is also a statutory structure in place adopted through the RSES (MASP) process, that is to provide for a strategic planning and investment framework in this area that would have application for the area edge of and contiguous to the boundary of the city. Regarding the city it is considered that the Core Strategy provides for a structured approach which facilitates co-ordination with the county plan.

In particular with respect to the development of Ardaun eastern area of the city, these lands already have the benefit of an LAP only adopted in 2018 by Galway City Council. This LAP is in compliance with national policy that designated this site as an MUHD and consequently included for in the NPF which identified Ardaun it as a key enabler. It also accords with the statutory RSES and MASP which identified it as a strategic growth area. The vehicle to drive appropriate investment in accordance with the NPF/RSES that is the URDF funding stream has been considered appropriate on the two rounds of the funding to date and works supported by this initiative have commenced. In addition direct engagement with IW has led to emerging servicing provisions. The preparation of an ABTA and collaborative work with the NTA has advanced the design (Dublin Road Bus Corridor) of specific linked provisions that will enable the area to be serviced by priority bus measures and active travel measures also. There is also potential in the design of the N6 GCRR to further co-ordinate this settlement strategy with high employment opportunities such as at Parkmore, and link with active transport measures through the potential of using roads made redundant from that scheme as direct link cycle paths.

From an urban planning perspective, this area (Ardaun) which can ultimately when fully developed service a maximum population of 12,000, is considered to represent a good model of a sequential approach. It is not considered appropriate to set aside the current LAP strategic settlement strategy which has a statutory framework and is aligned with national and regional, metropolitan planning policy. It is not considered that the city area with a strong commitment to consolidation and regeneration can be balanced with an additional very expansive area of land in designated for development in the county area which is now included for in the county plan and is of a greenfield lands nature. This it is considered would undermine the delivery on NPO 3 (b) and the ambitions for regeneration /opportunity sites. It is considered that the Bearna and Oranmore zoning is as provided for is generally a good approach already for consolidation of existing settlements and is accommodated in the MASP.

Notwithstanding this, the local authority is both active and committed to ongoing engagement with Galway County Council, the NWRA, TII, NTA, IW, and the OPW with respect to the MASP area and is endeavouring to make it deliver success for Galway as a regional city.

There is engagement of both authorities jointly with IW to prepare a study to review the long term strategic needs of the city and the environs from Bearna to Oranmore. This includes for the Galway Strategic Drainage Study (SDS) which will inform the needs of Galway city and surrounding areas in the long term including future WWTP needs for the Galway city agglomeration. It also includes for measures to secure a strategic water supply through supplementary measures included and activated for in the Corrib Water Resource Zone supply.

Shared projects also include development of the Galway Transport Strategy which has a remit for the city and existing settlement in the environs and includes a range of projects such as continued linkage of networks for active travel, bus networks, rail linkage and enhancement (URDF funding for Garraun and Ceannt Station) the strategic road project - N6 GCRR and the Galway-Dublin Greenway and

connection onwards to Connemara greenway. There are also ongoing, more immediate and localised measures at Parkmore such as the provision of bus lanes, cycle measures and vehicular traffic management measures co-ordinated between the authorities to resolve and service this shared area.

Other specific shared projects also include commitment and co-ordination of the appropriate development of the former Galway Airport Site of which the City and County Councils are joint owners. Both authorities have also agreed a timeframe to engage on and prepare a Joint Metropolitan Retail Strategy which will commence following the adoption of the city plan.

In addition and as included for in the DCDP there are a number of policies that will enable co-ordination between generation of renewable energy. The county council area currently supports many wind farms and there is anticipation of expansion of off-shore renewables that can be facilitated onshore within the city through the related supply chain activity at Galway Port, the DCDP includes a number of policy supports for this and for a green hydrogen hub supplied from such sources.

It is agreed that a structure to establish and focus on shared needs if formalised in some manner would be beneficial but has not been provided for at national level legislatively. Such a strategic focus should however not just be that in the realm of spatial planning as it is noted the MASP has an economic remit too and should also include for social and environmental shared issues.

Recent engagement (May 2022) initiated by the Galway City Planning SPC to have joint engagement with the County Council SPC included NWRA executives to discuss the topic of the Metropolitan Area Strategic Plan (MASP) for Galway and how strategic shared goals can be embedded and advanced for this area. A number of options for progressing the MASP, including relating to governance / monitoring structures was the subject of positive discussion at this workshop. The option of exploring a best practice MASP governance and establishing areas of priority focus were agreed to be of shared importance. It was also mooted to repeat this joint SPC engagement, potentially on a regularly scheduled basis. Although no formalised mechanism for the next stages have been agreed to advance further as of yet, it will need commitment from both authorities and the NWRA as a lead partner. Notwithstanding this, it is considered that positive engagement to date will enable "a joint strategy "to advance. It is not deemed appropriate to presume the mechanisms for this at this stage to such a degree as to include for it in the DCDP. However the legislation facility for variation to both development plans can be invoked at a later stage of advancement if deemed necessary. Regardless of the time required for this advancement the ongoing co-ordination with respect to strategic infrastructure will continue and has shared commitment and support from the NWRA, TII, NTA and IW.

No recommended amendments are deemed appropriate currently, it is considered that a strategy for the MASP area is advancing in conjunction with the RSES and Galway County Council and is the statutory framework adopted in accordance with the NPF and planning legislation.

Rural Housing

Significant pressure for urban generated housing is evident in the rural hinterland. Continuing this pattern of development represents a real risk of undermining more sustainable growth in areas less dependent on the private car and the environmental costs of development in unserviced areas including water quality, loss of biodiversity and landscape sensitivity.

Policy 5.10 provides for limited residential development in 'A' zoned agricultural lands which appears to be limited to circumstances where 'a convincing case of need is established' or to immediate members of families of persons who are householders and residing in the immediate area and to farmers and the immediate members of their families.

Section 11.12 Agricultural Areas addresses residential development on agricultural lands zoned 'A' does not refer to the requirement to establish a need as set out in section 5.9 of the draft Plan.

The Office considers policy regarding residential development on 'G' zoned lands is unclear from sections 5.9 (Agricultural Lands) and 11.2.4 (G Land Use Zoning Objective). National Policy Objective

19 (NPO 19) states ‘...In rural areas under urban influence, facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic or social need to live in a rural area and siting and design criteria...’ The Office considers that the rural housing policy in the draft Plan is ambiguous and requires review to ensure consistency with NPO 19 of the NPF.

The OPR advises that there may be inconsistencies with the approach to the rural hinterland between the draft Galway City Development Plan and draft Galway County Development Plan.

Recommendation 8 – Rural Housing

Having regard to NPO 19 of the NPF, the purpose of the Agriculture (A) and Agriculture and High Amenity (G) zoning objectives, and policy 5.10 in the draft Plan, the planning authority is required to:

- (i) review the rural housing policies in the draft Plan to ensure consistency with NPO 19 and in particular the core consideration of demonstrable economic or social need;
- (ii) amend the criteria in section 11.12 regarding residential development on agricultural lands to reference the requirement to establish a demonstrable economic or social need;
- (iii) clarify the rural housing policy regarding residential development on ‘G’ zoned lands; and
- (iv) review the approach to the rural hinterland in respect of rural housing to ensure that it is co-ordinated with the draft Galway County Development Plan.

Chief Executive's Response

The context of the evolution of the city as an urban area is an important parameter in understanding the intent of both the **A** and **G** zonings. Galway City is defined under local government legislation as an urban area, which affords interpretation for the application of planning legislation, both acts and regulations and gives definition for the application of certain uses such as those of an agricultural nature. It is therefore not considered appropriate to interpret the city, including the peripheral lands therein as equating with a planning context of county rural lands.

Galway City carries a legacy of a significant boundary extension as provided for under the Local Government (Reorganisation) Act 1985. Included in this peripheral expansion were historic clustering patterns of development, some more recent defined villages and more disparate patterns of housing. Embracing the concept of an urban authority where all lands attract specific land use zonings and applying a sustainable approach in the subsequent plans the primary intent in the plans was to restrict unnecessary and inappropriate development on the majority of undeveloped lands and reserve these lands for use as provided for in Section 5.2 of the draft Plan which states that ‘...Agricultural lands also contribute to the green network providing a natural backdrop to the city and supporting a diverse habitat’ with their primary purpose in respect of open space type being ‘Lands used for agriculture purposes, often forming greenbelt, offering amenity, passive recreation and visual aspect, contributing to biodiversity.’ This is consistent with NPO 62 of the NPF to strengthen the value of greenbelts and green spaces. These lands can also contribute in a longer term period to sequential urban extensions, strategic projects (such as the N6 GCRR). To enable this and to retain the ambient rural character, specific zonings of an agricultural nature are applied to these lands. The differentiation between the **A** and **G** zoning is that the **G** zoning as referenced in Section 5.9 is one of degree. **G** zoning is of higher value from a natural heritage amenity, visual and habitat perspective. Much of the **G** zoning includes for locations both within and adjacent to European sites and the objective is to protect these areas from incompatible development.

In general **A** and **G** are described as having objectives to protect these areas from all inappropriate development and are not an equivalence to protection solely against “rural housing”. The local authority consider that focusing on these zoning in the context of the application of NPO 19 to this

lands is reductive. This is not to say that the local authority does not apply a consistency with the planning guidelines relevant to sustainable rural housing but that these lands are in an urban area, zoned sustainably in a restrictive manner to protect against development in general but where some consideration is given to housing use in the **A** zoning only of a particular nature akin to that which is provided for in S.28 Ministerial Guidelines No.14.

Housing is only one of many uses that can jeopardise the sustainable use of such lands and this has been evidenced by experience in the development management process where pressures for a range of other uses of a commercial, industrial, retail has occurred but where the zonings have proved effective in operation and limitation. As a use, the overture for rural type housing may be the most frequently applied for form of development pressure but the zoning regardless cannot be simply equated with a rural county housing scenario.

The approach as referenced in Section 5.9 is included to comply with the S.28 Guidelines No.14 and to be consistent with the intent of NPO 19. The resultant application of this criteria as provided for in Section 5.9 ensures a very restrictive approach where such housing as is referenced, is only open for consideration in the **A** zoning and not accommodated under any circumstances on the **G** land use zoning.

The assessment of housing need and provision of what is described in the S28 guidelines as “an appropriate level of housing options” is accommodated for in Section 11.2.3 and Section 5.9. All applications for housing development are required to furnish evidence to establish a need (familial land ownership–social) as provided for in the terms of the guidelines before they can be considered for assessment and as the DCDP outlines where granted, these permissions include for restrictive clauses. The marginal number of houses granted under these circumstances bears evidence to the restrictive nature of the policy.

At per the OPR’s recommendation additional wording can be inserted in Section 11.2.3 to give further clarity that conveys the requirement to establish a demonstrable “economic or social need”.

As previously referenced the **G** zoning does not permit “rural housing” as is apparent in Section 11.2.4, in contrast to Section 11.2.3 where reference is specifically provided for in that section.

The local authority has reviewed the approach to rural housing as provided for in the Galway County Development Plan 22-29 as adopted, with respect to the interface of boundaries with Galway City Council. In this regard we would draw the OPR’s attention to section 4.6.3 rural housing strategy RH1 (Rural Housing Zone 1 and Rural Housing Zone 1 rural metropolitan area, including Zone 2 area under strong urban influence as provided for in the county plan. As is apparent the provisions for accommodation of rural housing is provided for subject to need on all lands interfacing with the city boundary. In general this approach has some parallels with the **A** zoning provisions in the city plan but is much less restrictive than the **G** zonings in the city plan which, as is apparent on the DCDP maps constitutes a large proportion of the shared boundary. The local authority in the interests of amenity, sustainability, strategic considerations and as referenced the need to be consistent with NPO 19, principles of sustainability do not consider it appropriate to modify the **G** land use zoning objectives to align with the approach to rural housing in the Galway County Development Plan 22-29.

Recommendation 8 – Rural Housing

R8 (i) The A zoning policy has been reviewed and it is recommended that there are proposed amendments included for in Section 11.12 and Policy Section 5.8

R8 (ii) It is recommended that there are proposed amendments included for in Section 11.12 and that reference the requirement to establish a demonstrable economic or social need.

R8 (iii) G zoning is as referenced in Section 5.9 of the DCDP a higher value agricultural zoning from a natural heritage amenity, visual and habitat perspective. Much of the **G** zoning includes for locations both within and adjacent to European sites and the objective is to protect these areas from a range of incompatible development. In this regard **G** zoning does not permit “rural housing”.

R8 (iv) Having reviewed the approach to rural housing in the County Plan it is not considered to change **A** nor **G** zoning, as referenced there are some parallels with the **A** zoning provisions in the city plan but there are no restrictive policies comparable to the **G** zonings in the city plan which would constitute a large proportion of the shared boundary. The local authority in the interests of amenity, sustainability, strategic considerations and as referenced the need to be consistent with NPO 19, principles of sustainability do not consider it appropriate to modify the **G** land use zoning objectives to align with the approach to rural housing in the Galway County Development Plan 22-29.

Chief Executive's Recommendation

Amend Section 5.9 Agricultural Lands to insert text in green

....A limited type of residential development may be considered in areas zoned A. However, unless a convincing case of need is established, consent for dwellings will not be considered except to the immediate members of families (i.e. sons and daughters, grandchildren, nieces and nephews) of persons who are householders and residing in the immediate area and to farmers and the immediate members of their families. **A demonstrable economic and/or social need to locate on these lands, supported by documentary evidence of an acceptable nature, will be required.** In all cases conditions on a grant of permission may be applied regarding initial occupancy. Such residential developments will not be open for consideration where suitable alternative sites are in the control of applicants or their immediate family and available on lands zoned for development within the City Council area....

Amend Section 11.2.3 Agricultural Area A Land Use Zoning Objectives new text in green

Zoning Objective A	
To provide for the development of agriculture and to protect the rural character.	
Uses which are compatible with and contribute to the zoning objective, for example:	<ul style="list-style-type: none"> – Agriculture and related developments – Accommodation for the Traveller Community
Uses which may contribute to the zoning objectives, dependent on the A location and scale of development, for example:	<ul style="list-style-type: none"> – Uses as set out in Section 5.9 Agricultural Lands in compliance with the Sustainable Rural Housing Guidelines for Planning Authorities (2005) and Section 11.3.1 (j) Conversion and Subdivision of Dwellings – Waste management facility – Public utilities – Public transportation facility – Burial grounds and associated services – Outdoor recreation with small scale associated facilities

Housing Policies

The OPR considers that the draft Plan does not provide implementable objectives for the provision of accommodation for Travellers consistent with the estimated need, and the land use zoning maps do not appear to indicate the location of lands to provide for such accommodation, as required under section 10(2)(i) of the Act.

The OPR cites their recent Case Study Paper on this subject matter which sets out examples of good practice.

Recommendation 9 – Traveller Accommodation

Having regard to the requirements of section 10(2)(i) of the Planning and Development Act 2000, as amended, the planning authority is required to identify in the Plan the use of particular areas for Traveller accommodation. This will include the identification of specific locations on the land use zoning maps.

Chief Executive's Response

The recommendation of the OPR is noted in relation to Traveller Accommodation and it is considered that the DCDP can be amended to identify the use of particular areas for Traveller accommodation by inserting an associated objective on the DCDP Map. This will be complemented by amended text in Section 3.3 in relation to Traveller Accommodation as provided for in the DCDP

Recommendation 9 – Traveller Accommodation – Identify proposed and existing specific Traveller Accommodation on the Development Plan Map.

Chief Executive's Recommendation

Amend the Land Use Zoning and Specific Objectives Map to identify the specific locations of existing and planned Traveller accommodation within the city boundary. These sites will be identified using a new symbol 'TA' and this symbol will be included for also in the Map legend.

The following existing and planned Traveller Accommodation locations will be identified on the Land Use Zoning and Specific Objectives Map using a new 'TA' symbol

Existing Traveller accommodation
Cul Tra, Salthill
Circular Road, Rahoon
Cuile Sheoige, Tuam Road,
St. Nicholas Park, Doughiska road
Fana Glas, Ballybane
Planned Traveller accommodation
Keeraun, Ballymoneen Road
Headford Road
Doughiska Road

Amend Section 3.3 Traveller Accommodation to insert additional text in green.

The TAP includes for accommodation to be provided through social and grouped housing and through refurbishment of existing halting sites. Traveller specific accommodation currently provided in the city and environs includes four permanent residential halting sites, one transient halting site and five group housing schemes. Standard City Council and AHB housing and accommodation through the RAS/Leasing and HAP schemes also caters for members of the Traveller community. Under the current Traveller Accommodation Programme additional accommodation is planned on council owned lands at Keeraun, Ballymoneen Road, along the Headford Road and the Doughiska Road. It is also proposed to carry out the redevelopment of the Circular Road halting site for provision of housing

units. Additional sites to meet Traveller accommodation needs will be identified in the Traveller Accommodation Programme subsequent to the 2019-2024 programme.

The Development Plan makes specific provision for Traveller specific accommodation in a range of land use zones which can facilitate achieving the recommendations contained in the TAP and in any subsequently adopted recommendations. Sites which include for Traveller accommodation are identified by the 'TA' symbol on the Land Use Zoning and Specific Objectives Map

Retail

The OPR is generally satisfied that the retail hierarchy set out in the draft Plan (Table 6.1) is consistent with the Core Strategy and welcomes the provision of a joint hierarchy for both the City and County areas.

The Office notes that the core retail area for Galway city (Figure 6.4) appropriately focuses retail development in the centre to support the vitality and vibrancy of the city/town centres and facilitate sustainable travel consistent with the Retail Planning Guidelines (2012).

Although Policy objective 6.11 (3) Retail Strategy of the draft Plan includes an objective to carry out a joint retail strategy with Galway County for the area covered by Galway MASP, no timeframe is specified and no policy framework is provided to ensure that a plan-led approach is maintained in respect of development that should be considered in the context of the Joint Strategy.

Recommendation 10 - Joint Retail Strategy

Having regard to the provisions of the section 28 Ministerial Guidelines for Planning Authorities Retail Planning (2012), and in particular paragraph 3.5 'Joint or Multi-Authority Retail Strategies', and retail strategy for the MASP set out at Policy objective 3.7.9 of the RSES, the planning authority is required to review Policy objective 6.11 (3) Retail Strategy and associated retail policies to include additional policy objectives in the draft Plan to: (i) address mechanisms and deliverable timelines to ensure that the Joint or Multi-Authority Retail Strategy for the Galway Metropolitan Area will be undertaken with adjoining relevant authorities; and (ii) appropriately restrict further retail provision which should be considered as part of the Joint Retail Strategy until such time as that Strategy is prepared.

Chief Executive's Response

Galway City Council have engaged with Galway City Council with respect to the preparation of a mechanism for future delivery of the joint strategy. The two councils have also agreed a timeframe to prepare a Joint Retail Strategy that will coordinate with the timing of adoption of both plans, the city council plan being a later adoption date. This work will commence in 2023 post adoption of the city plan. It is recommended that an amendment is made in Section 2 Retail Strategy Policy 6.11 (3) to include for this element similar in wording to that included for in the recently adopted Galway County Plan

With respect to the concern regarding the restriction of further retail it is considered that the DCDP includes for sufficient policy based retail guidance as required under legislation. As outlined in section 6.5 Retail Hierarchy of the DCDP a retail hierarchy has been included based on the retail hierarchy set out in the MASP which is co-ordinated with and supports the settlement strategy and transport strategy. It is noted that a similar approach has been taken with respect to the Galway County Council Plan 22-28 as adopted.

Recommendation 10 - Joint Retail Strategy – The relevant polices have been reviewed and proposed amendment included, reflective of engagement with Galway Co Council on this topic.

Chief Executive's Recommendation

Amend Retail Strategy Policy 6.11 (3) Additional text in green

Review the strategies and policies for retailing **and vary the plan if necessary** following the preparation of a **Joint Retail Strategy for the Galway Metropolitan Area** with Galway County Council, to ensure sufficient policy support to create a positive framework for continued vitality and investment in the main retail areas especially the Galway MASP and to ensure an informed and consistent approach to policies relating to shared retailing activities in line with national policy. **The preparation of the Joint Retail Strategy for the Galway Metropolitan Area will be completed within one year of the adoption of the City Development Plan and will be initiated and managed by a joint local authority working group.**

Renewable Energy

The OPR notes the support in the draft Plan for increased use of renewable energy and development of renewable energy infrastructure and considers that the draft Plan could be expanded to include for a range of policies and objectives that support low carbon district heating, waste heating recovery and utilisation and micro renewable energy production.

Recommendation 11 –Renewable Energy

In accordance with the provisions of section 12(18) and section 28(1)(c) of the Planning and Development Act 2000, as amended, and having regard to the government's commitment in the Climate Action Plan 2021, which sets a target of increasing the share of electricity demand generated from renewable sources up to 80% by 2030; National Policy Objective 55 which promotes renewable energy use and generation to meet national targets, the planning authority is required to include specific policies objectives to **support low carbon district heating, waste heating recovery and utilisation and micro-renewable energy production for the city plan area**

Chief Executive's Response

Recommendation 11 regarding renewable energy is noted. The Development Plan has been prepared accordance with the provisions of section 12(18) and section 28(1)(c) of the Planning and Development Act 2000, as amended, and with regard to the Climate Action Plan 2021 in alignment with national and regional planning policy objectives. The following amendments are proposed to strengthen references to renewable energy, low carbon district heating and waste heating recovery and utilisation. Amendments will be included to updated and reflect revised targets for the generation of renewable energy in the Climate Action Plan 2021.

Recommendation 11 –Renewable Energy – It is proposed to include for amendments in Chapter 2 and Chapter 9.

Chief Executive's Recommendation

Amend Policy 2.3.4 – Additional text in green

Promote small scale, on-site energy development, where energy generated is primarily required to meet the needs of households, communities and businesses to reduce their carbon emissions. Examples could include micro wind/solar energy generation, **low carbon** district heating, **waste heating recovery and utilisation**, geothermal and air to water energy technologies.

Amend Section 2.3 Renewable Energy (Mitigation) paragraph 2

The Development Plan supports the increase in use of renewable energy and development of renewable energy infrastructure and initiatives to provide a viable alternative to the burning of fossil fuels. Sources of renewable energy include solar photovoltaic (PV), solar thermal, geothermal, hydroelectric power, tidal power, renewable gas, green hydrogen, the use of biofuels and onshore and offshore wind turbines. Only some of these present suitable opportunities in the city being an

urban area. Potential also exists for examining **low carbon** district centre heating and **waste heating recovery and utilisation** opportunities within the city particularly in newly designated areas such as Ardaun and in some of the regeneration sites.

Amend Section 9.13 Energy and Associated Infrastructure under Renewable Energy paragraph 1

Ireland is committed to generating **80%** of its electricity requirements from renewable energy by 2030 (**Climate Action Plan 2021**). This will reduce greenhouse gas emissions generated by electricity and facilitate the reduction of emissions in other such as transport and heating through electrification. In order to meet the increased demand for renewable electricity the government through the Renewable Electricity Support Scheme (RESS) is committed to increasing capacity across a number of sectors by 2030 including offshore wind and renewable energy, onshore wind and solar

Flood Risk Management

In relation to the SFRA, a request for flood map of sufficient scale to clearly identify which lands impacted by flood risk is requested and to assess if the sequential approach has been applied.

The OPR comments on approach to justification tests generally confirming that the Plan Making Justification Tests in the SFRA are in accordance with NPO 57 and the Planning System and Flood Risk Management Guidelines for Planning Authorities.

The OPR refers to a number of lands where there are land use zonings proposed in conjunction with vulnerability as per the Guidelines, which overlap with Flood Zones A and B, and queries the need for plan justification test application, in particular lands zoned (CF) to the south of Dún Na Mara Drive, and lands zoned for (LDR) to the south of Coast Road near Curragreen and raises the issue of requiring policy objective for flood risk assessment and the sequential approach application. Reference is made to the recently published documentation on Nature Based Solutions which could be added to Policy 9.4. The Office further considers that point no. 3 of Policy 9.1 should be revised to ensure that the SFRA is fully complied with and that site specific flood risk assessments are required in all areas of identified flood risk, as stated in section 11.27 of the draft Plan.

Recommendation 12 – Flood Risk Management

Having regard to the detailed requirements of The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009), the planning authority is required to:

- (i) provide a land use zoning map of appropriate scale and resolution to clearly outline the sites at risk of flooding and to assess that the sequential approach has been applied;
- (ii) ensure that the plan making Justification Test is applied and passed for all proposed land use zonings, classified as highly vulnerable development in the Guidelines, which overlap with Flood Zones A and B. Sites which do not pass the Justification test should not be zoned for vulnerable development;
- (iii) amend the wording of Policy 9.1 to ensure consistency with section 11.27 of the draft Plan and to ensure that the Strategic Flood Risk Assessment will be fully implemented and complied with;
- (iv) include a policy that requires a Flood Risk Assessment (FRA) and the sequential approach is required for lands zoned for any development proposals where a small proportion of the site is at risk of flooding; and
- (v) include reference in Policy 9.4, or otherwise, to the recently published DHLGH 'Nature Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document' (November 2021), prepared under the Local Authority Waters Programme.

Chief Executive's Response

The recommendation of the OPR is noted in relation to Flood Risk Management

Recommendation 12 (i) - It is recommended following adoption of the plan that an interactive web based Land Use Zoning and Specific Objectives Map be created to include a range of layers including the flood zone A and B mapping layer and be made available in conjunction with the City Plan and Environmental Assessment and supporting documents for the duration of the plan period. This would provide the most optimum level of clarity with regard to identification of areas at flood risk in the city.

Recommendation 12 (ii) - Amendments are proposed to the SFRA that will include for updated Justification Tests for the following areas / sites:

- Existing residential across the city
- CI at Salthill
- Nuns Island Masterplan Area
- Waterworks site
- Clarification added that Lough Atalia does not require JT.
- LDR lands, Murrough
- CF zoning at Father Griffin Road.
- I zoning at Galway Harbour Enterprise Park
- CF zoning at Renmore Barracks.

As per OPR reference regarding CF zoned lands to the rear of and included in Renmore Barracks lands. A specific objective amendment is proposed regarding these lands. Reference is specifically made by the OPR to LDR zoned lands also at Curragrean. It is noted that chapter 11 Fig. 11.24 states that development shall be restricted to two houses only. These houses have been granted permission (PI ref: 17/25 and 21/87) one constructed, fronting onto the Coast Road which is the extent of development allowed on the family owned site. Their rear site boundary location is at a significant distance (circa 150m) from the flood zone and therefore no additional development is provided for in policy/objectives at this location.

Recommendation 12 (iii) and 12 (iv) - It is recommended that additional text be included in the DCDP to ensure consistency with section 11.27 by amending Policy 9.1 Flood Risk.

Recommendation 12 (v) - It is recommended to include reference to the recently published DHLGH 'Nature Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document' (November 2021), prepared under the Local Authority Waters Programme in Section 9.5 and in Development Management Standards - Section 11.19 Green Design & Surface Water/SuDS.

Chief Executive's Recommendation

Amend Section 11.2.1 as follows to include for additional text in green.

CF lands south of the railway line at Renmore occupied by the Defence Forces comprising approximately 9 hectares. The Council will consider the development of these lands for institutional, amenity or community facilities use either by the Defence Forces or another institution and will not permit residential, commercial or industrial development. **Any development shall not impact on lands which have been identified as at flood risk and a site specific flood risk assessment will be required as part of any development proposal.**

Amend Policy 9.1 Flood Risk to include for edited text (strikeout) and new text in green.

Ensure the recommendations of the Strategic Flood Risk Assessment (SFRA) for the Galway City Development Plan 2023-2029 are taken into consideration in the assessment of developments in identified areas of flood risk. And Require site specific Flood Risk Assessment (FRA) and associated design and construction measures **appropriate to the scale and nature of the development and the risks**

arising, in all areas of identified flood risk ~~where appropriate~~ including on sites where a only small proportion of the site is at risk of flooding and adopt a sequential approach in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009).

Amend Section 9.5 Sustainable Urban Drainage Systems (SuDS) to include for edited text (strikeout) and new text in green.

LAWPRO in conjunction with the DHLGH are developing an implementation strategy for the development of Water Sensitive Urban Design, which includes nature based SuDS and when completed will provide useful guidance in an urban context. The draft River Basin Management Plan also recognises the benefits of using nature based surface water management and the need to move away from engineering solutions. In this regard, ~~an action of the draft RBMP is to provide interim guidance to local authorities on measures to be implemented to support the delivery of a greater focus on nature based solutions in advance of a national implementation strategy. The Council will have regard to this guidance when published and in the interim will consider international best practice guidance manuals. 'Nature Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document' (DHLG) (November 2021)~~, has been prepared in order to provide guidance on measures to be implemented to support the delivery of a greater focus on nature based solutions. The council will have regard to this interim guidance in advance of a national implementation strategy.

Amend Section 11.9 Green Design & Surface Water/SuDS to include for new text in green.

New development shall consider the use of innovative design features in buildings including Green roofs, walls and roof gardens. These are important measures in the control of surface water runoff, providing thermal insulation, enhancing biodiversity and promoting a varied cityscape. Development proposals which include any of the above elements shall be accompanied by details of construction techniques, long-term viability, maintenance and management, prepared by a suitably qualified landscape designer.

Development proposals will be required to be accompanied by a comprehensive SuDS assessment that addresses run-off quantity, run-off quality and its impact on the existing habitat and water quality and will have regard to guidance set out in Planning for Watercourses in the Urban Environment (IFI 2020) and *Nature Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document* (DHLG) (November 2021).

Environment, Heritage and Amenities - Public Rights of way

The OPR acknowledges the comprehensive and systematic approach taken by the planning authority in addressing the wide range of issues relevant to the protection, preservation and improvement of environmental, built heritage and amenities.

Specifically it is noted that Section 10(2)(o) of the Act requires public rights of way to be located on both a map and on a list appended to the development plan. The OPR notes that section 5.7.1 and policy 5.5 of the draft Plan refer to an objective to create and maintain public rights of way for both pedestrian convenience and amenity reasons, detailing walking trails and public rights of way within the county.

The Plan does not include an objective for public rights of way nor are there any maps to illustrate any existing or proposed. The planning authority's attention is drawn to examples of good practice identified in the OPR's recent Case Study Paper on this subject matter.

Recommendation 13 – Public Rights of Way

Having regard to the requirements of Section 10(2)(o) of the Planning and Development Act 2000, as amended, the planning authority is required to include inventory and maps identifying public rights of way.

Chief Executive's Response

The DCDP in Chapter 5 section 5.7.1 refers to the ongoing work being carried out with respect to public rights of way. As referenced and agreed at draft stage with the Council Members

"A compilation of an inventory of established rights of way in the city has commenced. In the interests of keeping this a dynamic project, it will be hosted on the Council website and will apply best practice approaches as highlighted in recent Office of the Planning Regulator (OPR) research".

To further the intent with regard to these ROW's it is proposed to include for the routes and their respective description that have been assessed, surveyed and recorded to date numbering 34 in an appendix to the DCDP. Inclusion of an associated website link to the development plan will allow for expansion of the description, photographic records and more site specific details as recorded in the surveys. To note the current ROW inventory has already been used for cross directorate engagement with respect to permeability, amenity and biodiversity. Phased of preparation of this inventory as indicated is ongoing and cautiously being advanced with local knowledge, land registry research and legal advice support and services.

Recommendation 13 – Public Rights of Way – A list of ROW, their routes and respective description is proposed to be included in the DCDP.

Chief Executive's Recommendation

Amend Draft City Development Plan to add an Appendix for Public Rights of Way

Include for an additional Appendix in the DCDP which gives details of the phase 1 and phase 2 of the Inventory on rights of way with a website link to additional details.

Amend Section 5.13 Specific Objectives Community Spaces – Short Term by inserting

Continue the phased recording of Public Rights of Way in accordance with OPR good practice guidance and make publicly available by inclusion in the website inventory and by use of the plan variation process.

OPR Observations

Development Management Standards

The OPR advises that the NPF favours performance based standards (NPO 13) as opposed to rigidly applied, blanket planning standards in relation to building height, garden size and car parking.

The OPR considers that there are a number of prescriptive standards promoted within Chapter 11 which could militate against the principle of promoting appropriate density and compact growth in the higher order tier settlements, for example in section 11.3.1, 11.4.2, 11.7.1 and 11.9.2, which reference plot ratio requirements and separation distances between residential dwellings.

The OPR notes that the car parking standards are not linked to the availability of public transport and the restriction on grouped parking is inappropriate given this is a measure that can encourage less reliance on the private car.

Observation 1 - Development Management Standards

In accordance with the provisions of NPO 13, the planning authority is advised to focus on assessing individual development proposals on performance based criteria dependent on location and individual site characteristics and is requested to remove:

- (i) the plot ratio standards and minimum separation distances between opposing windows;
- (ii) the differentiation between Outer and Established Suburbs in relation to car parking provision, and link the car parking standards required to the availability of public transport and active travel infrastructure provided in accordance with the Galway Transport Strategy; and
- (iii) the reference to state that grouped parking shall not be allocated to individual residential units.

Chief Executive's Response

Regarding observation 1(i) it is recognised that the national policy focus on development management standards and guidelines is for these to be drafted with an emphasis on “performance based criteria” linked to location and individual site characteristics as opposed to applying rigid development standards. NPO 13 as set out in the National Planning Framework (NPF) states: *In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.*

With regard to the observation on removal of plot ratio standards, it is considered that from an urban development management viewpoint, their retention provides a very useful mechanism for measurement and is a valuable benchmark standard. As stated in reply to OPR recommendation 6, plot ratio is a very appropriate mechanism for calculating density in an urban context reflecting floor area extent as opposed to units per hectare and can encourage the better and more flexible outcomes. This approach is particularly pertinent when assessing mixed use developments where there is a mix of residential units and commercial floor areas. Using a plot ratio allows for greater emphasis to be placed on unit mix, flexibility in distribution of floor space and sizes rather than just unit numbers. It has been used to good effect on many schemes in the city and is easily understood and adaptable for proposers of development.

Under OPR recommendation 8 the CE is proposing amendments to replace the 0.46 plot ratio for residential development on R zoned lands with relevant S.28 guidance. However, it is not considered appropriate to omit the plot ratio for CC, CI and I zoned lands. The plot ratio gives a benchmark of what can be achieved and gives clarity to applicants and the general public. For CC zones a plot ratio of 2.00:1.00 is the general standard which is in keeping with the existing city centre core context, particularly as this mainly constitutes the historic core. Chapter 10 and Chapter 11 also allows for the discretion for consideration of higher plot ratio based on a range of specific criteria. This allows for the flexibility that is advocated under the performance based criteria approach. As is in evidence this has allowed for consideration for a range of scales and densities as have been granted and constructed (see Bonham Quay; Ceannt Quarter; Crown Quarter permissions) A lower plot ratio of 1.25: 1.00 for CI zones and 1.0: 1.00 for industrial zones reflects in general the densities pursued in these use zones and by nature has worked effectively for both the planning authority and applicants as is testified by uncontested decisions and constructed developments. As provided for in Chapter 10 and Chapter 11 in certain cases there is an allowance for consideration of higher plot ratio based on a range of criteria – location, transport provision type of uses etc, thus giving flexibility, this is specifically linked also to guidance as provided for in the Urban Density & Height Study.

With regard to the observation on the removal of minimum separation distances between opposing windows, it is considered that the wording in Chapter 11, section 11.3.1 (d) overlooking provides a benchmark for future development. It is considered important to give a general benchmark to ensure that residential amenity is protected. It is noted that this standard only applies to suburban locations reduced distances are considered in respect of locations closer to and in the city centre, particularly at higher density city centre locations. It is noted that for the established suburbs in section 11.3.2 the Amenity Standards state in certain circumstances that the established form and layout would deem a reduction in standards appropriate, in the interests of sustainability, architectural quality and urban design this has given flexibility. This has been frequently applied in appropriate circumstances in the development management process for these areas successfully. Within other zones, consideration is on a case by case basis that is – performance based is the approach. In order to provide for clarity on this flexibility an amendment to Section 11.3.1 (d) Overlooking is proposed.

With regard to Section 11.3.1 (f) Distance between Dwellings for New Residential Development. This is considered a useful standard specifically to facilitate rear access including bin storage aligned with the multiple bin policy that encourages sustainable domestic waste management. In order to provide for greater flexibility an amendment to Section 11.3.1 (f) Distance between Dwellings for New Residential Development is proposed.

With regard to **observation 1(ii) and 1(iii)** the request to remove the differentiation between Outer and Established Suburbs in relation to car parking provision, link the car parking standards required to the availability of public transport and active travel infrastructure provided and in relation to grouped parking is noted.

In this regard, it is considered that these standards should be retained for the present time. The Galway Transport Strategy is being implemented over a 20 year period, a range of projects are currently at design stage which will enable greater availability of public transport and active travel infrastructure over time. The advancement of these projects will enable the discretion to reduce the level of car parking within schemes in concert with the provision of improved services.

The wording of the DCDP is flexible to allow for discretion as the impact of the delivery of public transport and active travel projects advance. The parking policy in the DCDP is to work towards National Policy, aligning the parking standards with Public Transportation and active travel measures with a view to re-evaluating car parking provision relative to location as projects progress from the GTS design to implementation stage that allows for increased public transport and active travel. During the period of the development plan, these standards can be reviewed particularly in the context and stage of implementation of GTS projects, additional national guidance and can include for the outcomes of the scheduled GTS review.

The differentiation between the outer suburbs and the established suburbs in relation to car parking is considered appropriate for the present time. Car parking requirements in the outer suburbs supports flexibility by setting out a range of options. The standards for the established suburbs, being a lower maximum reflects greater proximity to the city centre. It is noted that Circular Letter: NRUP 02/2021 states that new national Sustainable Residential Development Guidelines being prepared will consider:

Responding to context by more effectively defining settlement hierarchies (cities, towns and villages) and place typologies (centres, inner neighbourhoods, outer suburbs, smaller settlements); and Linking development criteria and standards to differing settlement hierarchies/place typologies, where appropriate, to enable more tailored design solutions in response to character/place setting;

Specifically regarding the observation in relation to grouped car parking, this was introduced to reduce the overall levels of car parking in residential schemes. It allowed for the flexibility of a reduced provision of car parking spaces within schemes, providing for sharing of grouped spaces where these are not specifically allocated to individual housing units but are available for to be used by all on a flexible use basis. This option has been used effectively in many schemes, particularly terraced, block schemes, mixed use schemes. This is considered to be a sustainable option for the present time and supports flexibility in the design of layouts and is an efficient on land use.

Chief Executive's Recommendation

Amend Section 11.3.1 (d) Overlooking by including for additional text in green

- Residential units shall **generally** not directly overlook private open space or land with development potential from above ground floor level by less than 11 metres minimum.

Amend Section 11.3.1 (f) Distance between Dwellings for New Residential Development by including for text in green.

- The distance between side gables and side boundaries of dwellings shall **generally** be a minimum of 1.5 metres.

- Within all other residential developments, including apartment buildings and large dwellings, (greater than 200m²), the distance between buildings shall **generally** be greater unless deemed acceptable under specific site **performance based criteria**, this is to provide a good layout and context for the development.

Amend Section 11.3.2 Established Suburbs section 11.3.2 (b) Amenity Standards by including for text in green

Shall be as per Outer Suburbs except in certain circumstances where the established form and layout would deem a reduction in these standards appropriate, in the interests of sustainability, architectural quality and urban design. **These will be assessed on performance based criteria.**

Approach to zoning

The OPR considers that the approach to zoning and permissible uses in section 11.2 of the draft Plan is too broad and doesn't provide sufficient guidance on uses that are generally permitted, open for consideration or not-permitted.

Observation 2 – Approach to zoning

Having regard to the Development Plans, Guidelines for Planning Authorities, Draft for Consultation (2021), the planning authority is requested to review the zoning objectives in the draft Plan to provide greater clarity regarding uses that are generally permitted, open for consideration or not-permitted within each of the zoning objectives. The Office advises the planning authority to consider including a zoning matrix in chapter 11 of the draft Plan

Chief Executive's Response

While it is acknowledged that adopting a generic approach to zoning nationally has some advantages, it is considered from an urban viewpoint, that these generic zoning objectives do not necessarily reflect the complexities of urban development. The specific zoning objectives for the city reflect the specific land use environment in the city and it could be considered that this specific approach gives a greater understanding to the public than having a generic approach as suggested and as included for in the Development Plans Guidelines for Planning Authorities – Draft for Consultation (2021). These specific zoning objectives are crafted also to allow for an element of performance basis in achieving the objective and to allow for an open examination of new uses.

It is noted that the guidelines are still in draft format and Circular Letter: NRUP 04/2021 advises on how they should be incorporated into draft plans, noting that many plans were at an advanced stage of preparation when the draft guidelines were issued and there may not be scope to address particular issues taking into account remaining periods of public consultation, reporting and decision making and any need for environmental assessment.

In this regard, it is considered that a change in the matrix of all the zoning objectives in the city to a national standardised approach would involve a significant body of work to assess each land use and each zoning objective and is not appropriate to present such a significant change at this advanced stage in the making of the development plan. Such a review is not feasible also owing to time and resources to be completed at this stage of this draft plan and would also not give the time needed for the Members to consider such substantial change in format to a standardised approach. To introduce it at this stage as a material alteration would also prejudice the opportunity for the public to fully consider the change in the broader context of the overall plan where it is more appropriate to be considered. There is also a more limited time for consideration, as this consultation period is a lesser timescale for public consultation than at draft plan consultation to allow for full engagement regarding such a substantial change.

In this regard no change is recommended.

Economic Development and Employment

The OPR is generally satisfied that the economic strategy set out in the draft Plan is consistent with the vision for the metropolitan area in the MASP (RSES).

The economic strategy is also supported by the Core Strategy, which has identified opportunities both in peripheral commercial locations and the city centre. The more peripheral locations do, however, pose a challenge for achieving a more sustainable modal share and reducing car dependency in these already congested areas. Further policy measures should be introduced to ensure that the transport Demand Management Measures (Section 4.5) and sections 11.9 and 11.10 are strengthened to ensure that development at these locations consistent with sustainable mobility and the protection of the capacity and efficiency of the national roads network.

Having regard to the established concentration of employment uses located along the north-east quarter of the city and adjoining suburbs, there is a need to counter balance employment uses to the western suburbs in the interest of sustainable mobility, reducing carbon emissions and addressing climate change, consistent with the objectives of the transport strategy proposed for Galway city and section 10(2) (n) of the Act.

The OPR acknowledges Policy 6.1 General Policy 12 which sets out strategic opportunities for job creation at Rahoon/Knocknacarra, however the Office considers that Policy 6.1 'General Policy 12' would benefit from further strengthening to realise this objective.

Observation 3 – Distribution of Employment Lands

Having regard to section 10(2C) (iii) and section 10(2)(n) of the Planning and Development Act 2000, as amended, of the Act and the Development Plans, Guidelines for Planning Authorities - Draft for Consultation (2021), the planning authority is advised to strengthen Policy 6.1 'General Policy 12' in the draft Plan to ensure that there is sufficient land activation mechanisms to facilitate employment generation in the western suburbs of the city.

Chief Executive's Response

The importance of active land management in promoting and facilitating employment generation in the western suburbs of the city is accepted. Measures are already included to enhance the attraction of these lands for employment. These include the development of a GTS core bus route adjacent to these lands, additional active transport measures, development of lands for housing of potential workforce nearby and provision of an objective for a road link as part of the N6 Galway City Ring Road (as included for in the recent planning consent for the proposed N6 Galway City Ring Road N6 GCRR) currently under JR. These measures enable the lands to become more advantaged for both

employment and employees. The local authority has also had ongoing engagement with prime stakeholders such as the IDA, Enterprise Ireland and others regarding the potential of these lands. These are it is considered good land activation measure that are ongoing. The observation to include additional text into policy 6.1.12 is noted and it is considered that the plan could benefit from a separate specific policy objective in Policy 6.1, in addition to Policy 6.1.12 to support land activation mechanisms to facilitate employment generation in the western suburbs of the city.

Observation 3 – Distribution of Employment Lands – To encourage land activation at this location a specific amendment is proposed.

Chief Executive's Recommendation

Amend Section 6.1 .12 to add Section 6.1.12 (b) as shown in green.

Apply active land use mechanisms to facilitate development of lands at Rahoon / Knocknacarra through a co-ordinated approach in conjunction with the Council, landowners, Dept. of Housing, Local Government and Heritage, Irish Water, National Transport Authority and other stakeholders.

Sustainable Transport and Accessibility

The OPR welcomes the objectives set out in Chapter 4 'Sustainable Mobility and Transportation' aimed at reversing the modal split to more sustainable forms which will positively reduce carbon emissions thus addressing climate change.

The OPR notes that Policy 4.3 supports modal change targets for walking, cycling, and public transport within the lifetime of the plan and it is understood that these will be set as part of the review of the Galway Transport Strategy.

Observation 4 – Sustainable transport

Having regard to section 10(2)(n) of the Planning and Development Act 2000 (as amended), the planning authority is requested to review the Transport Demand Management Measures (Section 4.5) and sections 11.9 and 11.10 of the draft Plan to strengthen the policy framework to ensure that employment opportunities at edge of centre locations such as Ballybrit, Dangan, Parkmore and Oranmore are consistent with sustainable mobility and the protection of the capacity and efficiency of the national roads network.

Chief Executive's Response

Section 4.5 of the DCDP, Transport Demand Measures has been proposed to be amended to included reference to the Five Cities Demand Management Study. This identifies transport demand drivers, and assesses the suitability of measures to reduce demand in Ireland's five largest urban centres—Dublin, Cork, Waterford, Limerick, and Galway. The recommendations from this report included that opportunities may arise in the future in Galway with the delivery of enhanced public transport and park and ride facilities as envisaged in the Galway Transport Strategy. The Study provides a focused and evidence-based approach to addressing the carbon, congestion and air quality challenges facing Irish Cities. The Council is committed to addressing these challenges as is evident in the policies and objectives which support a modal shift, active travel measures, park and rides and the 15 minute city and neighbourhoods concept. The scheduled review of the GTS, due to commence in 2022 and be completed in 2023, will also provide an opportunity to re-evaluate transport demand measures and any consequences arising from this study.

Section 11.10 Transportation has been proposed to be amended also to strengthen and include for the requirement of ABTAs and TAAs for assessment purposes to ensure that employment opportunities at the edge of centre locations such as Ballybrit, Dangan, Parkmore and Oranmore are

consistent with sustainable mobility and protection of the capacity and efficiency of the national roads network.

The DCDP has on a strategic level made provisions for strategic growth areas to align with the employment lands on the east of the city. Section 10.25 of the DCDP includes for Ardaun LAP, a key piece of the overall settlement strategy for the city. This will allow for the potential to reduce the demand for commuting employees giving more opportunities for living close to a large employment base. The significant future population and residential growth planned for this area is reflected in the Core Strategy. Ardaun LAP is well placed to develop the homes for those who can exploit the employment opportunities at Ballybrit, Parkmore the strategic IDA sites, hospital sites and at Mervue having close physical links with the existing sites and aligned also with planned public and active transport investment.

The area Ballybrit /Parkmore is capable of being served by a number of minor extensions to bus routes along with an increase in frequency to existing public transport bus routes. These are currently being considered under the GTS, which will enable better integration of employment and housing at this location. Being proximate also creates potential for viable cycling and walking options. In general through active land management and strategic planning, the local authority is working on an ongoing basis with stakeholders to support the development of sustainable supporting infrastructure.

Observation 4 – Sustainable transport – Policies are recommended to be amended to strengthen the policy approach to transport demand management and sustainable mobility.

Chief Executive's Recommendation:

Amend Section 4.5 Transport Demand Measures to include for following text after first paragraph additional text shown in green.

The Five Cities Demand Management Study identifies transport demand drivers, and assesses the suitability of measures to reduce demand in Ireland's five largest urban centres—Dublin, Cork, Waterford, Limerick, and Galway. The recommendations from this report included that opportunities may arise in the future in Galway with the delivery of enhanced public transport and park and ride facilities as envisaged in the Galway Transport Strategy. The Study provides a focused and evidence-based approach to addressing the carbon, congestion and air quality challenges facing Irish Cities. Galway City Council is committed to addressing these challenges as reflected in the policies and objectives which support a modal shift, active travel measures, park and ride and the 15 minute city and neighbourhoods concept. The scheduled review of the GTS, due to commence in 2022 and to be completed in 2023, will also provide an opportunity to re-evaluate transport demand measures.

Amend Section 11.10.3 - Travel Plans to include for additional text after 3rd paragraph additional text shown in green.

Complementary measures such as Area Based Transport Assessments (ABTA) and Traffic and Transport Assessments (TTA) are required for Local Area Plans (LAP's) and can also be considered on Masterplans and Framework Plans, where the scale of development determines the need for integrated land use and transport planning policies. A Traffic and Transport Assessment is a comprehensive review of all the potential transport impacts of a proposed development or re-development, with an agreed plan to mitigate any adverse consequences and should be carried out in accordance with **Traffic & Transport Assessment Guidelines PE-PDV-02045 May 2014**. The preparation of ABTAs, includes for an assessment process focused on understanding transport needs and land use integration, used in the preparation of Local Area Plans, planning schemes and masterplans and shall be carried out in accordance with **Area Based Transport Assessment (ABTA) Guidance Notes PE-PDV-02046 April 2018** and supplementary ABTA How to Guide, Guidance Document, Pilot Methodology (2021). There shall also be a requirement for the principles of DMURS to be applied to Local Area Plans, Masterplans and Framework Plans taking into account street design based on the street classification and measures for cyclist and pedestrians to promote placemaking as set out in Section 11.3.1 (b) of the plan.

Climate Action and Renewable Energy

The Draft Guidelines (2021) place considerable emphasis on climate action (adaptation and mitigation). Balancing growth with sustainable approaches to development, land-use and transportation are key policy decisions to be made through the development plan. The manner of addressing climate change in statutory development plans is the subject of ongoing policy development. Accordingly, it would be prudent to include an objective in the draft Plan to the effect that an assessment will be undertaken in relation to the implications of the introduction of such future policy mechanisms, with a view to varying the draft Plan as made to ensure consistency with relevant climate assessment and development plan guidelines.

Observation 5 – Climate Action

Given the importance attributed to climate action by Government, as evidenced by, inter alia, the recent Climate Action and Low Carbon Development Act (2021) and the Climate Action Plan 2021, the planning authority is advised that the draft Plan should also include an objective to consider a variation of the development plan within a reasonable period of time, or to include such other mechanism, as may be appropriate, to ensure the development plan will be consistent with the approach to climate action recommended in the Development Plans, Guidelines for Planning Authorities - Draft for Consultation (2021) or any other relevant guidelines.

Chief Executive's Response

It is noted that Policy 2.2.5 accommodates the five year Local Authority Climate Action Plan in accordance with the Climate Action and Low Carbon Development Amendment Act 2021. This can be re-worded for emphasis.

Observation 5 – Climate Action – Additional text recommended to Include

Chief Executive's Recommendation

Amend Policy 2.2.5 – omit strikethrough text and insert text in green.

Prepare and make a five year Local Authority Climate Action Plan in accordance with the Climate Action and Low Carbon Development Amendment Act 2021 and future supporting guidelines. ~~and consequently~~ Review the Development Plan to ensure alignment consistency with the Local Authority Climate Action Plan and future climate action policy and guidance and if required bring forward a variation of the plan.

Environmental Reports

The OPR considers that there is scope to enhance the integration between environmental reporting and the draft Plan preparation process. For instance, the environmental report does not include any analysis or discussion of the council's deliberations of the draft Plan prepared by the executive or any analysis of the directions or motions of the elected members in the process of the draft Plan for public display.

Observation 6 – Environmental reporting

The planning authority is advised that in order to give full meaning to the strategic environmental assessment process as set out in the directive, it should ensure that as/when material amendments arise, the environmental reporting is iterative and transparent with the decision-making process at that stage.

Chief Executive's Response

It is noted and agreed and confirmed that this approach is standard practice for the local authority

Observation 7 – Implementation and monitoring

Having regard to the commitment of the planning authority to securing and monitoring the implementation of the strategies, policies and objectives of the draft Plan, the Office requests the planning authority to consider how Appendix 1 'Implementation and Monitoring' could be amended to ensure that any monitoring is strategic in nature consistent with Part 10 of the Development Plans Guidelines for Planning Authorities - Draft for Consultation (2021).

Chief Executive's Response

The comments of the OPR are noted. The local authority recognises the importance of monitoring the implementation of any plan or programme. Appendix 1 will be amended to provide a comprehensive list of indicators that will support monitoring in order to assess the success with which the development plan is being implemented. This will take into account section 10 of the Draft Development Plans, Guidelines for Planning Authorities, (2021) which sets out a comprehensive list of indicators to be monitored and reported on, on an annual basis. It is anticipated that best practice will require a matrix-based framework approach to monitor implementation of the plan, similar to the approach proposed in the Draft Dun Laoghaire Rathdown County Council plan.

The local authority is committed to the establishment of this ongoing monitoring system for the development plan as a permanent function, within the organisation. The monitoring process will also inform Galway City Council's two year review of the City Development Plan on progress securing Plan objectives (Section 15(2) Planning and Development Act). The monitoring reports will include for assessment of the consistency and alignment with pertinent objectives within Regional Spatial and Economic Strategy, Galway Metropolitan Area Strategic Plan and Galway Transport Strategy. The monitoring strategy will also include any significant environmental effects of the implementation of the Development Plan (as per Article 10 of SEA Directive and also demonstrate alignment UN Sustainable Development Goals).

It is however not possible or prudent to include for full details and to finalise the approach at this stage, as the Core Strategy, strategic and other development objectives, plan text and land-use zoning maps are subject to change before the final plan stage.

Observation 7 – Implementation and Monitoring – It is proposed to amend Appendix 1 to provide a comprehensive list of indicators to be monitored in order to assess the success with which the development plan is being implemented against a range of criteria including the NPF;RSES;MASP; UN Sustainable Development Goals and the SEA. This approach will be finalised following completion of the plan making process.

Chief Executive's Recommendation

Amend Appendix 1 by committing to the following range of implementation and monitoring regime To be included for in Appendix 1 following completion of the plan making process.

Appendix 1- Implementation and Monitoring will include for a comprehensive list of indicators to be monitored in accordance with best practice, including for the draft Development Plans, Guidelines for Planning Authorities Consultation Draft (August 2021), with the objectives within the National Planning Framework, Regional Spatial and Economic Strategy, Galway Metropolitan Area Strategic Plan and Galway Transport Strategy in addition to the SEA and UNSDG's in order to assess the success with which the development plan is being implemented

Observation 8 – Standardised Zoning Objectives

Having regard to the recently published Development Plans Guidelines for Planning Authorities – Draft for Consultation (2021), the planning authority is advised to review the zoning objectives in the draft Plan to adopt the standardised zoning objectives in Appendix B of the Guidelines. This will assist in providing a consistent approach to zoning nationally and aid the understanding of zoning objectives by the public and the development sector alike.

Chief Executive's Response

While it is acknowledged that adopting a generic approach to zoning nationally has some advantages, it is considered from an urban viewpoint, that these generic zoning objectives do not necessarily reflect the complexities of urban development. The specific zoning objectives for the city reflect the specific land use environment in the city and it could be considered that this specific approach gives a greater understanding to the public and developers than having a generic approach as suggested and as included for in the Development Plans Guidelines for Planning Authorities – Draft for Consultation (2021).

It is noted that these guidelines are still in draft format and Circular Letter: NRUP 04/2021 advises on how they should be incorporated into draft plans, noting that many plans were at an advanced stage of preparation when the draft guidelines were issued and there may not be scope to address particular issues taking into account remaining periods of public consultation, reporting and decision making and any need for environmental assessment.

In this regard, it is considered that a change of all the zoning objectives in the city to a national standardised approach would involve a significant body of work to assess each land use and each zoning objective and is not appropriate to present such a significant change at this advanced stage in the making of the development plan. Such a review is not feasible also owing to time and resources to be completed at this stage of this draft plan and would also not give the time needed for the Members to consider such substantial change in format to a standardised approach. To introduce it at this stage as a material alteration would also prejudice the opportunity for the public to fully consider the change in the broader context of the overall plan where it is more appropriate to be considered. There is also a more limited time for consideration being a lesser timescale for public consultation than at draft plan consultation.

Summary of the submission from the Northern & Western Regional Assembly including recommendations and observations

(Submission no. [GLWC-C2-64](#))

Summary of Issues raised

The Northern and Western Regional Assembly is generally satisfied that the draft plan is consistent with the Policy Objectives in the RSES. The Urban Density and Building Height Study is consistent with RPO 3.6.3 and the Assembly commends the approach and supports the findings in the study. It considers that it would be of benefit for better cross referencing to be included in the written statement, in order to stitch the study into the plan.

Chapter 1: Introduction and Core Strategy

The inclusion of the MASP is consistent with RPO 3.6.1, in relation to the collaborative approach with local authorities. The Assembly notes that greater emphasis should be placed on fostering collaboration with other regional cities.

The Core Strategy in Table 1.2 references the population growth targets in the RSES and even though these are higher than the ESRI projections, they have been adopted in the Core Strategy Table 1.8. This is consistent with the narrative in S3.6 of the RSES.

The plan is consistent with RPOs which encourage compact and brownfield development (refer 3.6.3, 3.6.4). There are links identified between residential development and lands with capacity for employment uses. The areas identified are consistent with the RPO 3.6.5.

Chapter 2: Climate Action

The Assembly note and support the prominent position given to climate action in the draft plan and considers that the policies in relation to climate action are consistent with the RSES.

Chapter 3 Housing and Sustainable Neighbourhoods

The Strategy and associated policies are comprehensive and are consistent with policies in the RSES.

The approach to sustainable neighbourhoods is consistent and policies are of significance in the planning of the City in terms of building heights and densities and in identifying and protecting the character of the City.

The policies are a finer grain than with similar policies in the MASP and are consistent with the RSES (refer RPOs 3.6.2 Compact Development 3.3.6. Building Heights Study 3.6.4 City Centre Sites). They are also consistent with RSES general placemaking policies (RPO 3.1, 3.2, 3.6).

Chapter 4: Sustainable Mobility and Transportation

The policies in the chapter around land use and transportation, implementation of the GTS, modal change, and sustainable densities are consistent with the RSES.

The delivery of all the elements of the GTS will be a challenge for the City and the Assembly suggests that co-ordination and prioritisation should form significant elements for the proposed review of the GTS.

The development and identification of Park and Ride facilities for example need to become more prominent, to facilitate long distance commuters and visitors to the City.

Chapter 5: National Heritage and Recreation and Amenity

The Assembly states that the draft plan, similar to the RSES, considers the green network to be an asset which provide important services to the City in terms of visual amenity, contribution to the character of the city and ecosystem services.

The Assembly states that they need to be protected in all of their guises, whether they comprise open space, protected habitat, protected views or agricultural land. This is consistent with the overarching

environmental objectives in Section 1.5 of the RSES. It is also consistent with more specific objectives RPO 5.2 Landscape, RPO 5.5 Biodiversity, RPO 5.6 Ecosystem Services and RPO 5.7 Environmental Assessments.

The Assembly consider inclusion of RPO 5.4 in the draft plan, which encourages the preparation of site-specific conservation objectives for all sites of conservation value.

It is considered that the policies in Chapter 5 of the DGCDP are consistent with those in the RSES.

Chapter 6: Economy, Enterprise and Retail

The Assembly consider that a reference to NPO 1c of the National Planning Framework (NPF) which links population growth and employment growth would be informative. The RSES indicates that a ratio of 0.66:1 jobs to population growth is a target for compact growth and integrated development. This would also contextualise the targets driving the implementation of national, regional and local plans.

There is a reference to the former Galway Airport as an opportunity site for economic purposes. The Assembly note that RPO 3.6.6, which gives regional perspective on the redevelopment of the airport site is not referenced and recommends that this be included.

The chapter goes on to describe different employment sectors such as high tech, office, enterprise and innovation, health and education, tourism, marine and creative. It sets out policies for each of the sectors. Sectoral policies accord well with the RSES and there is a high level of consistency.

Chapter 7: Community and Culture

The policy direction with respect to Arts, Inclusivity, Health, Wellbeing, Education, Promotion of Irish, Early Childhood Services and Healthcare reflect the RPOs in Chapter 7 of the RSES and the narratives in Section 3.6 on the MASP and are considered consistent with the RSES.

Chapter 8: Built Heritage

The Assembly consider that policies in Chapter 8 of the draft plan are consistent with those in the RSES, in particular in relation to placemaking which is an important part of the RSES.

Chapter 9: Environment and Infrastructure

The assembly consider that it would be useful in planning for future growth if data on water storage capacity were included in the plan.

The RSES includes that many of the objectives in the RSES, particularly in Chapter 6: Connected Region and Chapter 7: Infrastructure Enabling our Region are reflected in the draft plan.

It is considered that the policies in Chapter 9 of the draft plan are consistent with those in the RSES.

Chapter 10: Compact Growth and Regeneration

The Assembly commends the Council for its widespread approach to regeneration throughout the City and this accords with national and regional goals for compact development.

The assembly notes that there are 20 areas identified for Masterplans and Spatial Frameworks which for the most part will be carried out by the landowners. While the draft plan provides guidance on design briefs for each of the areas, the Assembly has concerns with the risk that the future of the city will be developer-led rather than plan-led.

The plan would benefit from greater clarity on the prioritisation and scheduling of the various proposals. The Assembly encourages the council to give greater prominence to the Urban Density and Building Heights study in defining the development parameters for the opportunity sites.

It is considered that the policies in Chapter 10 of the draft plan are consistent with those in RSES.

Chapter 11: Development Standards

There is a very comprehensive schedule of technical requirements for all types of development which will aid and inform planning applications.

Specific development objectives for different sites throughout the City should include area of lands and be cross-referenced to the building heights study.

With regard to appendix 1, implementation and monitoring, the Assembly is embarking on a similar process for the RSES and look forward to collaboration with the council in that regard. It would also suggest that a joint approach between the City and County Councils in relation to the monitoring of the MASP should be considered.

CE Response and Recommendation

The comments from the Northern and Western Regional Assembly and consideration that the policies of the plan are consistent with the RSES are noted and welcome.

Northern and Western Regional Assembly Recommendations

Recommendation 1: That Chapter 1 places greater emphasis on fostering collaboration with other regional cities, consistent with RPO 3.6.1 of the RSES.

RPO 3.6.1 of the RSES states that it is an objective to establish a collaborative approach between the Regional Assemblies (NWRA & SRA), the local authorities and other stakeholders to enable all their metropolitan areas to collaborate to harness their combined potential as an alternative to Dublin. The Council recognises the importance of collaborating with Cork, Limerick and Waterford, the other regional cities in accordance with RPO 3.6.1. This is reflected in the narrative text in Chapter 1, specifically Section 1.3.3 which states that The City Plan will advance these ambitions at a more fine grained level and build on the RSES strategy to grow the city as a globally competitive, successful, urban centre of scale. It will through implementation of the MASP regional policy objectives, at local plan level also be a primary driver in strengthening the development of the region. At inter-regional level, collectively with the development of the other regional cities, the Galway MASP can contribute to re-balancing growth nationally to achieve more regional parity and viable alternatives to Dublin.

It is also included as a policy objective in Policy 1.2.3 of the Draft Plan: Collaborate with other regional cities in order to harness the combined potential and to maximise opportunities to provide a counterbalance to the growth of Dublin. The Council welcomes further guidance from the Assembly in this area as a key stakeholder named in RPO 3.6.1

Recommendation 2: That Chapter 5 of the draft plan include consideration of RPO 5.4 of the RSES, which encourages the preparation of site-specific conservation objectives for all sites of conservation value.

RPO 5.4 states to 'Encourage the prioritisation of Site-Specific Conservation Objectives (SSCO) for all sites of Conservation Value, designated in EU Directive (i.e. SACs, SPAs) to integrate with the development objectives of this Strategy' .

It is not considered appropriate to include this recommendation into the draft plan. The preparation of site-specific conservation objectives for Special Areas of Conservation and Special Protection Areas is not within the remit of the development plan or the local Authority, the responsibility lies with the NPWS who states that this is an ongoing process.

It is noted that of the major sites adjacent to Galway City- Lough Corrib SAC, Galway Bay Complex SAC and Inner Galway Bay SPA have site-specific conservation objectives. Lough Corrib SPA does not, however as noted in the Natura Impact Report, the generic conservation objectives set out by the NPWS apply. In this regard, the absence of site specific conservation objectives for the Lough Corrib SPA have not unduly impacted on the preparation of the Natura Impact Report or the integration with the development strategy for the city.

Recommendation 3: That Chapter 6 references NPO 1c of the National Planning Framework (NPF) which links the creation of jobs and population growth at a ratio of 0.66:1.

The request to include reference to NPO 1c in Chapter 6 is noted.

The CE Recommendation is to amend Section 6.1 Context insert text in 15th paragraph – outlined in green as follows:

This shift towards Ireland's regions is supported by the enhanced development of the four regional cities of Galway, Limerick, Cork and Waterford. The NPF sees the regions as being supported by these cities and the cities being strengthened in their role as accessible centres of high value employment and services and focal points for investment to enable them to have the widest possible regional influence. **It is noted that National Policy Objective NPO 1c of the National Planning Framework has a target growth of around 115,000 additional people in employment i.e. 450,000 (0.45m) in total in the Northern and Western Region by 2040.** The NPF gives recognition in particular to Galway City's key role as a growth centre and driver for investment and identifies several key growth enabler projects for the Galway MASP area which can support and enhance Galway's economic role.

Recommendation 4: That the section in Chapter 6 on the former Galway Airport as an opportunity site for economic purposes includes reference to RPO 3.6.6 of the RSES, which requires the preparation of a masterplan, including associated lands for residential, community and employment uses.

RPO 3.6.6 states that the Assembly supports the preparation of a masterplan for the Airport Site and developed lands (including associated lands) in its immediate hinterland (on both sides of the R339) for residential, community and employment uses. The preparation of the masterplan may be prepared on a phased basis if this is considered appropriate.

The request to include reference to RPO 3.6.6 is noted. Section 6.3.2 Industrial Sector includes text in relation to Galway Airport as an opportunity site and text is recommended to include preparation of a masterplan. With regard to associated lands, it would not be appropriate for the council to make reference to these as they are not within the ownership of the councils and not within their capacity to deliver. These lands are also outside of the administrative boundary of the city.

The CE recommendation is to amend Section 6.3.2 Industrial Sector to include in the second paragraph text outlined in green and to delete text as a ~~strikeout~~ as follows:

Another key opportunity site for industrial and enterprise use is the former Galway Airport site. These lands were purchased by Galway City and Galway County Council when the airport function ceased with a vision to re-use for economic purposes. This 46 ha site is identified in the NPF as a growth enabler and being located in the MASP area the Plan includes an objective to unlock the potential of the lands in the lifetime of the strategy. An analysis of this site has been undertaken by Galway County Council which includes a framework for the potential redevelopment of the site for economic benefit of the wider Galway region. The Framework will inform the preparation by both councils of a masterplan for the Airport Site in consultation with all relevant stakeholders including the NTA, TII and Irish Water. A supporting objective for this framework masterplan is included in the current Draft Galway County Development Plan 2022-28.

Observations

Observations 1: That co-ordination and prioritisation form significant elements for the proposed review of the GTS referenced in Chapter 4. For example, the development and identification of Park and Ride facilities need to become more prominent, to facilitate long distance commuters and visitors to the city.

This observation is noted. The methodology for carrying out the GTS review is outside the scope of the Development Plan, however it is likely that co-ordination and prioritisation of projects will be an important consideration. The delivery of Park and Ride sites on the periphery of the city are key to the implementation of the GTS and modal shift. They will reduce the amount of commuter traffic entering the city and thus contribute to a reduction in traffic congestion and emission levels. A park and ride location analysis has been undertaken which will enable the identification of possible areas within Galway City and its environs where such facilities may be suitable and site identification is ongoing with the NTA. Policy support for Park and Ride in the Plan is set out in Policy 4.3.4 *Prioritise the*

provision of park and ride facilities at appropriate locations so that they align with the bus network and cross- city link route to create the necessary modal shift to reduce car dependency.

Observations 2: The Assembly suggest that data on water storage capacities be included in Chapter 9 of the plan, in order to better inform the public and plan for the city.

This observation is noted. It is not considered appropriate or feasible to include data on water storage capacities in the city. Water storage is provided in a range of situations in the city from attenuation tanks associated with private developments to Irish water infrastructure including reservoirs.

Observations 3: The Assembly suggest that a prioritisation and scheduling scheme be provided for the many regeneration masterplans etc. proposed for the city and that greater prominence be given to the Urban Density and Building Heights Study in regeneration proposals.

This observation is noted. A number of amendments are proposed arising from the recommendations of the OPR including for prioritisation (see response to the OPR). In relation to the preparation of masterplans/spatial frameworks for regeneration and opportunity sites, these are to be undertaken as part of the planning consent process by respective applicants. It is not possible to set out schedules for their preparation.

It is considered that sufficient prominence has been given to the Urban Density and Building Heights Study in the draft plan. Key elements of that study are incorporated into Chapter 8 which is referenced in text associated with the Regeneration and Opportunity sites. It is noted also that amendments have been made to further strengthen the draft plan and these are located in Chapter 11 (see amendments to Chapter 11).

Observations 4: The Assembly suggest that development proposals for different sites outlined in Chapter 11, using thumbnail drawings of excerpts from the draft plan be improved with reference to areas of zoned land and cross referenced to the building heights study.

This observation is noted. A number of amendments are proposed arising from the recommendations of the OPR including the removal of many of Specific Development Objective maps in Chapter 11.

It is recommended that the remaining small maps in Chapter 11 be reviewed and improved with reference to areas of zoned land and cross referenced to the building heights study where appropriate.

CE Recommendation

Review Specific Development Objective maps in Chapter 11 with reference to areas of zoned land and cross referenced to the Urban Density and Building Height Study where appropriate.

Observations 5: That a joint approach between the City and County Councils in relation to the monitoring of the MASP be considered.

The local authority acknowledges the importance of co-ordination of the city and the city environs which constitutes the MASP area. It is noted that the local authority is both active and committed to ongoing engagement with Galway County Council with respect to the MASP area. This includes through the GTS, the preparation of a joint retail strategy and masterplanning of the Airport site.

It is noted that Recent engagement (May 2022) initiated by the Galway City Planning SPC to have joint engagement with the County Council SPC included NWRA executives to discuss the topic of the Metropolitan Area Strategic Plan (MASP) for Galway and how strategic shared goals can be embedded and advanced for this area. A number of options for progressing the MASP, including relating to governance / monitoring structures was the subject of positive discussion at this workshop.

Although no formalised mechanism for the next stages have been agreed to advance further as of yet, it will need commitment from both authorities and the NWRA as a leading partner. The local authority are open to furthering mechanisms for joint monitoring. The council looks forward to the launch of the Assembly's Regional Development Monitor Online Data Platform which will be a significant asset for monitoring of the MASP and monitoring implementation of the Development Plan

Part 3: Summary of submissions by chapter (including appendices and environmental assessments) and the CE's response and recommendations to issues raised

Chapter 1: Introduction, Strategic Context & Core Strategy

Introduction/Strategic Vision		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-148 Galway City Community Network	<p>Strategic Goals</p> <p>GCCN requests that the following be included under the Strategic Goals 1.2:</p> <ol style="list-style-type: none"> 1. The Council will set out a vision for planning and design for the city by placing the unique features of Galway, particularly the city's relationship with the river, sea and canals, at the heart of the vision for planning (p.14). 	<p>CE Response</p> <p>It is implicit in existing Strategic Goals that the “unique features of Galway” of which the waterways are defining characteristics are identified as part of the strategic vision. The copious references to water bodies throughout the chapters of the DCDP is evidence of the strategic goals influencing context and policy associated with the river, sea and canals, particularly of note in Chapters 2,5,6,9 and 10.</p> <p>Of the 10 Strategic Goals in Section 1.2 the following – the first, third, fourth, sixth, seventh and ninth all include for this approach.</p> <p>The copious references to water bodies throughout the consequent chapters of the DCDP is evidence of the strategic goals influencing context and policy associated with the river, sea and canals, particularly of note in chapters 2,5,6,9 and 10.</p> <p>The sixth strategic goal makes reference to the Green Network it does imply both land and water assets it is recommended to amend as follow for clarity and reinforcement -</p> <p>CE Recommendation: Amend Section 1.2 Strategic Goals to include text in green</p> <p><i>Protect and enhance the distinctive and diverse natural environment in the city and strengthen the green and blue network and linkages, recognising the biodiversity value of the amenity, the range of recreational benefits this provides, the potential for facilitating active and healthy lifestyles, the effect it can have on the quality of general health and well-being and the value it has for providing good place making and an attractive city setting. (pg. 14)</i></p>

	Sustainable Development Goals	CE Response
GLWC-C2-148 Galway City Community Network	<p>Each chapter in the Development Plan must set out clearly, in measurable terms, how the policies therein are consistent with Ireland's commitment to achieve the SDGs by 2030. Each chapter should include specific actions, targets with indicators from the Global Indicator Framework which they relate to. These clearly specified indicators can be used to monitor the progress of the Development Plan in achieving the SDGs during its lifetime.</p> <p>GCCN also requests that the following be added to Policy 1.1 United Nations Sustainability Goals (p.15)</p> <ol style="list-style-type: none"> 1. The Council will identify a range of appropriate indicators, selected from among the SDG Global Framework of Indicators, for each of the SDGs to enable progress towards their achievement to be monitored. 2. All actions will be benchmarked against in the Sustainable Development Goals with targets and evidence as to how the actions relate to the realisation of the goals <p>The inclusion of the Sustainable Development Goals in Chapter 1 is welcome. The draft plan does not focus sufficiently on contributing to Ireland's commitment to achieve the SDGs by 2030.</p> <p>It is not clear from the draft plan how the policies in each Chapter therein will contribute to the achievement of the SDGs.</p> <p>CE Recommendations:</p> <ol style="list-style-type: none"> 1. The plan must include measurable targets and timelines. 2. The City Council should identify an appropriate range of indicators from among the SDG Global Indicator Framework 	Refer to CE Report section on Appendix 1: Implementation & Monitoring
GLWC-C2-187 Brendan Smith		
GLWC-C2-227 Brendan Mulligan		

	3. That range of indicators should be used to monitor progress towards the achievement of the SDGs	
GLWC-C2-148 Galway City Community Network	Public Sector Equality and Human Rights Duty Development Plan must take cognisance of the Public Sector Equality and Human Rights Duty in design, implementation and monitoring to ensure the human rights and equality concerns of communities named in equality legislation are assessed, addressed and reported on in all planning.	CE Response It is acknowledged that the <i>Public Sector Equality and Human Rights Duty</i> obliges the public sector “in design, implementation in the performance of their functions, to have regard to the need to eliminate discrimination, promote equality and protect human rights of staff and people availing of their services” <i>Irish Human Rights and Equality Commission</i> .
GLWC-C2-196 COPE Galway	Recommendation: 1. The following specific policy must be included in the Development Plan in Chapter 1: The Council will undertake its required Public Sector Duty Assessment, across all aspects of the Council's responsibilities, within year 1 of the new plan being adopted. COPE Galway - The Development Plan must take into consideration the Public Sector Equality and Human Rights Duty.	 It is considered that as far as this applies to a land use plan, the DCDP has been drafted in the context of national planning legislation which aspires to provide, in the interests of the common good, for proper planning and sustainable development. In this regard the strategies, policies and objectives also aim to be equitable, balanced and transparent and to promote and maximize social inclusion. It is not considered appropriate to include for a specific policy as proposed in a land use plan as this has more relevance as an objective in the overall local authority Corporate Plan.

		<p>Galway an equal and inclusive city, particularly through facilitating all forms of social inclusion in the built environment, including in the public realm, housing, and community facilities and in the ability to access services, amenities, employment opportunities and public transportation".</p> <p>This ideal is also reflected and elaborated on in a number of other areas of the draft plan including in <i>Section 7.3 Inclusive City</i> of the DCDP.</p>
<p>GLWC-C2-201 Galway City Alcohol Forum</p> <p>GLWC-C2-202 Galway City Early Years sub- committee of CYPSC</p>	<p>Support Promotion of health and wellbeing</p> <p>The Draft City Development plan provides an opportunity to support the promotion of health and wellbeing and the implementation of the Sustainable Development Goals. There are a number of areas within the draft plan that could be strengthened as follows:</p> <p>All Chapters</p> <ul style="list-style-type: none"> • Integrate the promotion and protection of health and wellbeing as a core objective • Commit to undertake health and wellbeing impact assessments of policies, applications and developments which include the prevention and reduction of alcohol related harm • Include a commitment to consult and collaborate with the HSE and other stakeholders in relation to the development and implementation of policies and plans • Ensure that the City Development plan is supportive of the implementation of existing strategies including Healthy Galway City, Galway City Strategy to Prevent and Reduce Alcohol Related harm and the Western Region Drug and Alcohol Task Force Strategy, Galway Age Friendly Strategy, Galway Children and Young People's Plan. 	<p>CE Response</p> <p>It is considered that it is more appropriate to amend the Preface - Strategic Policy Framework Section to include for additional text reference in green</p> <ul style="list-style-type: none"> • Healthy Ireland Strategic Action Plan 2021–2025 <p>It is considered that the 6th Strategic Goal (Pg. 14) of the DCDP includes for this in the context of a land use plan -</p> <p><i>Protect and enhance the distinctive and diverse natural environment in the city and strengthen the green network and linkages, recognising the biodiversity value of the amenity, the range of recreational benefits this provides, the potential for facilitating active and healthy lifestyles, the effect it can have on the quality of general health and well-being and the value it has for providing good placemaking and an attractive city setting.</i></p> <p>Stakeholder engagement has been extensive in the preparation of DCDP and has been included for at all stages. Implementation of many of the policies will be associated with specific projects under the remit of the local authority and private planning applications all which include for public and where relevant stakeholder consultation.</p> <p>Following on from the Strategic Goals including the specifically referenced one Chapter 7 in Section 7.3 elaborates on aspects of inclusiveness, quality of life, health and wellbeing, age friendly, children and young people, and diversity and also includes for relevant supporting policies. Refer also to proposed amendments in CE Report for Chapter 3 and 11 relating to Housing for Older persons.</p>

GLWC-C2-230 Dept. Housing, Local Government and Heritage	<p>Built and Cultural Heritage</p> <p>The National Monuments Service requests that the strategic goals incorporate the protection and support of the built and cultural heritage.</p>	<p>CE Response</p> <p>Although intended in the Strategic Goal to have this effect it is recommended that text is added to give more clarity as requested.</p> <p>CE Recommendation:</p> <p>Amend Section 1.2 Strategic Goals to include for text in green</p> <p>Achieve a high quality of life for all citizens through the provision of a good quality, attractive, built environment, through the protection of the unique cultural heritage, built heritage and natural environment and through facilitation of key economic, cultural and social supports.</p>
GLWC-C2-147 Galway City Community Network	<p>Monitoring UN SDGs</p> <ul style="list-style-type: none"> • That the SDG Framework of Indicators should be better integrated into the document to ensure that progression towards these goals can be measured and barriers to their attainment can be addressed. • Monitoring plays a crucial role in understanding how effective the Development Plan objectives are in contributing to Ireland's commitment to achieve the Sustainable Development Goals by 2030. The Council will establish a methodology, based on a selection of appropriate indicators from the SDG Global Framework indicators. Therefore, each chapter should include actions and name the specific targets and indicators from the Global Indicator Framework which they relate to. • These appropriate indicators will be included in Appendix 1 (p.327) and integrated into the methodology outlined in the Draft Strategic Environmental Assessment Report (p.60) and plan arising from a Public Sector Duty Assessment. • GCC will undertake its required Public Sector Duty Assessment, across all aspects of the Councils responsibilities, within year 1 of the new plan. The plans and 	<p>CE Response</p> <p>Refer to CE Report section on Appendix 1: Implementation & Monitoring</p> <p>Refer to previous comment re Public Sector Duty in CE response to submissions 148 and 196.</p>

	<p>actions developed to address issues raised in the equality and human rights assessment will include the appropriate SDG indicators.</p> <ul style="list-style-type: none"> The Chief Executive's two-year report will include a review of the progress achieved in relation to the SDGs and any recommendations necessary to ensure that Ireland's commitment to achieve the SDGs by 2030 will be realised. GCCN, as the Public Participation Network for Galway City should be named as a key stakeholder as provided for in the Local Government Reform Act 2014. The attainment of the SDGs is of crucial importance towards mitigating crises in the future, and securing the human rights of citizens, so cannot be separated from Public Sector Duty. 	<p>Refer to CE Report section on Appendix 1: Implementation & Monitoring</p> <p>Refer to CE Report section Chapter 7 and associated proposed amendments</p> <p>Noted</p>
GLWC-C2-190 An Taisce - Galway Planning Committee	<p>Proposed rewording of Strategic Goals to create measurable actions</p> <p>The stated Strategic Goal is:</p> <p><i>"3. Commit to climate action and the national targeted reduction of greenhouse gas emissions through proactive measures in line with EU and national commitments to enable a just transition to a climate resilient, biodiversity rich and climate neutral economy and society, in particular through specific promotion, adaptation and mitigation measures."</i></p> <p>"Commit to" is a vague, unmeasurable action. This section lacks measurable commitments from Galway City Council to achieving Ireland's National Climate Targets in the Climate Action and Low Carbon Development (Amendment) Act 2021 to reduce Greenhouse Gas emissions by 51% by 2030, and a legally binding target of net-zero emissions no later than 2050 and how progress will be measured. These targets include</p>	<p>CE Response</p> <p>The strategic goal refers specifically to national targets and EU and national commitments. The rational of not including references to specific pieces of legislation and plans is that these are dynamic mechanisms that can and will most likely be further amended, expanded on over the course of the plan period. Chapter 2 elaborates more on the international, European and national context and includes for policy in 2.2 which references support for the climate action legislation and a number of associated plans.</p> <p>CE Recommendation:</p> <p>Amend text in Section 1.2 Strategic Goals insert text in green</p> <p>Commit to climate action and pursue the national targeted reduction of greenhouse gas emissions through proactive measures in line with EU and national commitments as included for in to enable a just transition to a climate resilient, biodiversity rich and climate neutral economy and society, in particular through specific promotion, adaptation and mitigation measures."</p>

<p>reducing emissions from sectors outside the EU's Emissions Trading System by 30% (relative to 2005 levels) by 2030.</p> <p>The Strategic Goal should be amended to:</p> <p><i>"3. Commit to climate action and the national targeted reduction of greenhouse gas emissions through proactive measures which support the National Climate Targets in the Climate Action and Low Carbon Development (Amendment) Act 2021 and the Climate Action Plan 2021, through specific objectives in each section of the plan."</i></p> <p>Another stated Strategic Goal is:</p> <p><i>"4. Apply the principle of sustainability and alignment with the 17 Sustainable Development Goals of the United Nations' 2030 Agenda for Sustainable Development particularly where they relate to the uses of land, buildings, water, energy, waste and through the encouragement of sustainable modes of transport and the integration of transportation with land use."</i></p> <p>"Apply the principle" is a vague, unmeasurable action. The section lacks measurable commitments from Galway City to meeting Ireland's 2030 National Sustainable Development Goals (SDG), and how progress will be measured. The SDG goals include an end to poverty, sustainable economic development, protection of the environment, access to health and education services, gender equality, peaceful societies and decent work.</p> <p>The section should be changed to:</p> <p><i>"4. Commit to the principle of sustainability and to honouring Ireland's commitment to achieving the Sustainable Development Goals (SDGs) by 2030 through specific objectives in relation to the uses of land, buildings,</i></p>	<p>CE Response</p> <p>Refer to CE Report section Chapter 2 and associated proposed amendments and Appendix 1: Implementation & Monitoring</p> <p>CE Recommendation:</p> <p>Amend Section 1.2 Strategic Goals and insert text in green</p> <p>Apply the principle of sustainability and alignment with the integrate the 17 Sustainable Development Goals of the United Nations' 2030 Agenda for Sustainable Development to better support the localisation of the SDGs and to contribute to their achievement internationally, particularly where they relate to the uses of land, buildings, water, energy, waste and through the encouragement of sustainable modes of transport and the integration of transportation with land use.</p>
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<p><i>water, energy, waste and through specific objectives in each section of the plan.”</i></p>	
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1.3 - Strategic Policy Context		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-153 People Before Profit Galway GLWC-C2-180 Access for All	<p>Policy 1.3 Metropolitan Area Strategic Plan (MASP)</p> <p>PAGE 20 (Page 18 in actual plan), under Policy 1.3 Metropolitan Area Strategic Plan (MASP): Recognise the importance of the Galway Metropolitan Area Strategic Plan (MASP) in the delivery of strategic growth with critical mass that supports the development of the city and existing surrounding settlements as strong, attractive urban places, supported by a level of services and infrastructure that creates successful, sustainable, universally accessible and socially inclusive communities and which harnesses the strengths associated with scale to maximise economic opportunities and supports investment.</p>	<p>CE Recommendation: Amend text in Policy 1.3 and insert text in green</p> <p>Policy 1.3 Metropolitan Area Strategic Plan (MASP):</p> <p>1. Recognise the importance of the Galway Metropolitan Area Strategic Plan (MASP) in the delivery of strategic growth with critical mass that supports the development of the city and existing surrounding settlements as strong, attractive urban places, supported by a level of services and infrastructure that creates successful, sustainable, universally accessible and socially inclusive communities and which harnesses the strengths associated with scale to maximise economic opportunities and supports investment.</p>
GLWC-C2-118 Ibuc	<p>Statement on alignment with NPF, RSES and MASP Needed</p> <p>The Galway City Development Plan should be accompanied by a clear statement on its alignment with the National Planning Framework, Regional Spatial and Economic Strategy and the Galway Metropolitan Area Strategic Plan (MASP).</p>	<p>CE Response</p> <p>This is included for in the draft plan refer to Policy 1.2</p>
GLWC-C2-118 Ibuc	<p>Plan for a population increase</p> <ul style="list-style-type: none"> The population targets and 25% additional growth allocated between the period 2016 to 2026 for Galway City and County, will guide the location of housing and population growth across the region. Sufficient zoned lands should be provided to ensure that no shortage in supply arises during the lifetime of the development plan. In prioritising the zoning of lands, regard should be had 	<p>CE Response</p> <p>Noted</p>

	<p>to their deliverability, accessibility, and capacity to consolidate urban development.</p> <ul style="list-style-type: none"> Given the level of growth targeted for metropolitan areas and their role as engines of growth at the top of the region's settlement hierarchy, the distribution of population and employment growth needs to be transport infrastructure led, so employment, housing and other services are better integrated and support sustainable travel. The role of the MASP is to accommodate population growth within the area that will ensure the vitality and appeal of Galway City and the surrounding towns and village settlements. Zoning decisions within the Development Plan 2023-29 should inform capital expenditure decisions on supporting infrastructure to unlock development sites. In addition, Government initiatives such as the URDF, Croí Cónaithe, and Project Tosaigh should be actively targeted at advancing the serviceability of zoned land and to address site viability issues, especially for apartment construction. The Development Plan 2023-29 should be the basis of Galway City Council's interaction to strategically target national and European investment funds to increase housing supply. Engagement with property industry stakeholders. 	<p>It is confirmed that this is the approach taken in the Core Strategy as is outlined in Section 1.4 and included for in a number of the policies in Policy 1.4. Also refer to proposed amendments to Core Strategy as included for in response to OPR Section 1.</p> <p>Noted</p> <p>It is confirmed that the preparation of the Core Strategy was coordinated with a baseline knowledge of the availability of existing infrastructure, stakeholder planned investment and strategies such as the GTS and the associated planned investment in sustainable transport. Public investment initiatives are being targeted already such as the recent success in the URDF funding stream and there is ongoing collaboration with the LDA to target delivery of housing including apartment development. The Plan includes for Implementation and Monitoring section (Appendix 1) and references this in 1.10. Refer also to proposed amendments in CE Report in Appendix 1: Implementation & Monitoring.</p> <p>Noted</p> <p>Engagement is ongoing and occurs both through the Development Plan process, policy making process and through the development management process.</p>
GLWC-C2-72 Land Development Agency	Proposed Text amendments to policy 1.2 and policy 1.3	CE Response

	<ul style="list-style-type: none"> LDA welcomes the strategic goals, the alignment with SDGs and the national/regional policy alignment and request text amendments to policy 1.2 and policy 1.3 to support collaboration with the LDA as a state agency in the delivery of housing on public land and through development of infill, derelict, brownfield and underutilised lands in the city and environs. 	<p>The key role of the LDA in the delivery of housing and the collaborative relationship between GCC and the LDA is referenced for in the draft plan in a number of chapters including Chapter 1, Core Strategy, Chapter 3 on Housing and Sustainable Neighborhoods and more specifically in Ch. 10 Compact Growth & Regeneration.</p> <p>It is not considered appropriate to give specific reference to the agency in policy 1.2 which is referencing the DCDP alignment with the National and Regional Framework (NPF and RSES) which included for the overall framework of land use planning not just housing.</p> <p>It is not considered appropriate to include a specific reference either to the LDA in Policy 1.3 which references the MASP and the overall informative framework of land use planning in this metropolitan area not just housing.</p> <p>It is considered that Policy 1.4 (9) below includes for all shared participants in the delivery of sustainable neighbourhoods including the LDA.</p> <p><i>Policy 1.4 (9) Collaborate with government departments, agencies and key stakeholders to assist in the delivery of enabling infrastructure, amenities and community facilities to facilitate compact growth, sustainable neighbourhoods and placemaking.</i></p> <p>Refer also to specific proposed amendment in response to OPR recommendations.</p>
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1.4 - Core Strategy Context		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-153 People Before Profit Galway	Core Strategy PAGE 32 (Page 30 in actual plan), under 1.5.3 Core Strategy Statement : To deliver on the compact growth approach, the strategy seeks to concentrate a significant amount of development that is, at least half of all new homes within the built footprint of the city and thereby accord with sustainable principles and the NPF/RSES objectives as well as the UNCRPD for housing delivery for people with disabilities.	CE Response It is considered that the recommendation to amend the Preface - Strategic Policy Framework Section to include for -UN Convention on the Rights of Persons with Disabilities (UNCRPD) as guiding document in the Strategic Policy Framework addresses this submission. It is not considered appropriate to locate it within the text which is a confirmation as to how the concept of "compact growth" is to be achieved.
GLWC-C2-153 People Before Profit Galway	Policy 1.4 Core Strategy (7) PAGE 42 (Page 40 in actual plan), under Policy 1.4 Core Strategy : 7. Support the local community goals of the LECP to reduce poverty and alleviate disadvantage in the city by proactively promoting all forms of social inclusion, accessibility in the built environment and public realm, housing, community facilities, employment opportunities, and transport in accordance with the UNCRPD.	CE Response It is considered that the recommendation to amend the Preface - Strategic Policy Framework Section to include for UN Convention on the Rights of Persons with Disabilities (UNCRPD) as a guiding document in the Strategic Policy Framework addresses this submission. The referenced policy relates to the support in the DCDP for the LECP which is the sole subject of the policy. It would not be correct to appendix on a reference that this support is somewhat linked directly to UNCRPD . This is not to say that the rights of persons with disabilities are not included, by supporting the LECP it also means supporting the key goals therein which includes an objective to ensure Galway is an inclusive and equal city.(Goal 3)
GLWC-C2-72 Land Development Agency	Proposed Policy Amendments to 1.4 <ul style="list-style-type: none"> LDA welcomes the Core Strategy approach and requests a number of amendments and additions to policy 1.4 to recognise the role of the LDA as a key agency in regeneration and delivery of housing including homes for social, affordable and cost-rental demand. 	CE Response The key role of the LDA in the delivery of housing and the collaborative relationship between GCC and the LDA is referenced for in the DCDP in a number of chapters including Chapter 1, Chapter 3 on Housing and Sustainable Neighborhoods and more specifically in Ch.10 Compact Growth & Regeneration.

	<ul style="list-style-type: none"> Proposes wording amendments to policy 1.4 to explicitly support a significant scale of housing on regeneration and opportunity sites and to support compact growth through the development of publicly-owned sites in cooperation with state agencies such as the LDA. Proposes wording amendments to policy 1.4 to explicitly reference collaboration with the LDA and to emphasise the regeneration approach in policy relating to active land management. Proposes additional policy to support collaboration and funding for implementation of the Core Strategy. 	<p>These overt references to the key role of the LDA in the delivery of housing are unequivocal in these referenced text location. It is felt the general policies on the Core Strategy have a broader remit and shouldn't specifically highlight the LDA as it is recognized that there are a wide range of influencing agencies and stakeholders that will contribute to compact growth, sustainable neighbourhood and place making and it wouldn't be appropriate to highlight only the LDA.</p> <p>It is considered that Policy 1.4 (9) as previously referenced is sufficient to cover this and as provided for includes all shared participants in the delivery of sustainable neighbourhoods including the LDA.</p>
GLWC-C2-156 Lidl Ireland GMBH	<p>Figure 1.6- Core Strategy Map - Westside District Centre</p> <p>We note that Westside is not listed under Figure 1.6, the Core Strategy Map contained in the Draft Plan, as a District Centre</p>	<p>CE Recommendation</p> <p>Amend the Core Strategy Map Figure 1.6</p> <p>Amend the Core Strategy map to insert an icon for the District centre at Westside.</p>
GLWC-C2-141 National Transport Agency	<p>Local Transport Plans - NTA</p> <ul style="list-style-type: none"> The NTA recommends that Policy 1.4 (10) Core Strategy is amended to include reference to accompanying Local Transport Plans. 	<p>CE Response</p> <p>It is not considered that any amendment is appropriate in this policy as it refers generally to the requirement to prepare Local Area Plans, Masterplans and Spatial Frameworks for certain areas and is not a reference as to the approach nor the broader associated assessments context required for such plans which will include for traffic and transport assessment amongst a number of other critical criteria.</p> <p>Refer to CE Report Chapter 11 and associated proposed amendments as these address transport assessment requirement on an area basis.</p>

GLWC-C2-162 HSE	<p>Healthcare services - HSE</p> <p>The HSE acknowledge the ongoing collaborative partnership between the City council and HSE west in the future development of the city and welcome the supports in the draft plan for healthcare provision</p> <p>HSE request an addition to Policy 1.4 Core Strategy to support the provision of new and improved healthcare services across the city to ensure that high-quality and accessible services are available in Galway, including the new hospital facilities in the city.</p>	<p>CE Response</p> <p>Noted</p> <p>The Core Strategy in Chapter 1 includes for a strategic level approach to land and land use and is required to show that the plan is consistent with national and regional spatial objectives. The policies in this chapter are therefore not focused on specific developments or specific critical infrastructure. However more appropriately reference to healthcare services is included for in Chapter 6 and Chapter 7, specifically Section 6.3.7 where there is reference and recognition of the regional healthcare status of Galway and new hospital facilities and where Policy 6.7 commits to support and facilitate these. Refer also to CE Report Chapter 7 and associated proposed amendment relative to critical healthcare infrastructure.</p>
GLWC-C2-69 Galway County Council	<p>MASP - Galway Co.Co</p> <p>Galway County Council requests inclusion of Garraun in Table 1.7 MASP Strategic Growth Areas, as it is earmarked for significant development to accommodate up to 1,1000 residential units.</p>	<p>CE Response</p> <p>As this table has been altered to relate to the city element of the MASP only, there is no requirement to include for Garraun.</p>

1.5 - Settlement Capacity Audit		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-69 Galway County Council	<p>1.5.2 Settlement Capacity Audit - Galway Co.Co</p> <p>Galway County Council consider that there is merit in further emphasis on higher density sustainable development with good public transport connectivity stating that 22 hectares of land are earmarked for high density</p>	<p>CE Response</p> <p>It would appear that this submission may have misinterpreted the quantum of residential land zoned for R – high density residential. The reference was that which has been proposed <u>in addition to</u></p>

development out of a total of 143 hectares of undeveloped residentially zoned land .	existing undeveloped residential lands zoned for this purpose in the current plan.
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1.9 - Core Strategy Map and Core Strategy Table

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-230 Dept. Housing, Local Government and Heritage	<p>Nature Conservation</p> <ul style="list-style-type: none"> The Department recommends that the Core Strategy includes to undertake Appropriate Assessment (AA), Strategic Environmental Assessment (SEA), Environmental Impact Assessment (EIA) and Ecological Impact Assessment (EcIA) as required and appropriate in relation to all downstream plans and projects arising from the plan. The Department recommends insertion of text that any projects that give rise to significant impacts on Natura sites shall not be permitted on the basis of the plan either individually or in combination with other plans or projects. The Department recommends that the Core Strategy include an objective to implement the objectives of the National Biodiversity Action Plan 2017-2021. 	<p>CE Response</p> <p>It is considered that Policy 5.2 (No.s 1-15) - Site of European, National and Local Ecological Importance covers this area comprehensively with regard to both plans and projects.</p> <p>It is considered that this is well covered throughout the DCDP. The Introduction, Strategic Goal no. 3 & 6; Section 1.4.1 Section 1.8 and Policy 1.4 particularly no.s 2 and 8 embed the relationship of the Core Strategy to Biodiversity protection and restoration in general.</p> <p>More specifically Chapter 2 and Chapter 5 emphasis the need to tackle the current biodiversity crisis. Chapter 5 specifically references in Policy 5.1 (no. 4)</p> <p><i>Support the implementation of the National Biodiversity Action Plan (2017- 2021) and the All-Ireland Pollinator Plan (2021-2025) and support the actions of the City Council's Heritage Plan 2016-2021 and Biodiversity Action Plan 2014-2024 relating to the promotion of ecological awareness, biodiversity and best practices.</i></p>

Chapter 1: CE Recommendations

Preface

Strategic Policy Framework

1. Include the following in 'Strategic Policy Framework' text added in green

- UN Convention on the Rights of Persons with Disabilities (UNCRPD)
- Healthy Ireland Strategic Action Plan 2021 - 2025

Introduction/Strategic Vision

2. Amend Section 1.2 Strategic Goals text in green

Protect and enhance the distinctive and diverse natural environment in the city and strengthen the green and blue network and linkages, recognising the biodiversity value of the amenity, the range of recreational benefits this provides, the potential for facilitating active and healthy lifestyles, the effect it can have on the quality of general health and well-being and the value it has for providing good place making and an attractive city setting. (pg. 14)

3. Amend Section 1.2 Strategic Goals to include for text in green

Achieve a high quality of life for all citizens through the provision of a good quality, attractive, built environment, through the protection of the unique cultural heritage, built heritage and natural environment and through facilitation of key economic, cultural and social supports.

4. Amend text in Section 1.2 Strategic Goals and include new text in green

Commit to climate action and pursue the national targeted reduction of greenhouse gas emissions through proactive measures in line with EU and national commitments as included for in to enable a just transition to a climate resilient, biodiversity rich and climate neutral economy and society, in particular through specific promotion, adaptation and mitigation measures."

5. Amend Section 1.2 Strategic Goals and delete ~~and kjj delte stikethough~~ text and insert text in green

Apply the principle of sustainability and alignment with the integrate the 17 Sustainable Development Goals of the United Nations' 2030 Agenda for Sustainable Development to better support the localisation of the SDGs and to contribute to their achievement internationally, particularly where they relate to the uses of land, buildings, water, energy, waste and through the encouragement of sustainable modes of transport and the integration of transportation with land use.

1.3 - Strategic Policy Context

6. Amend text in Policy 1.3 and insert text in green

Policy 1.3.1 Metropolitan Area Strategic Plan (MASP):

Recognise the importance of the Galway Metropolitan Area Strategic Plan (MASP) in the delivery of strategic growth with critical mass that supports the development of the city and existing surrounding settlements as strong, attractive urban places, supported by a level of services and infrastructure that creates successful, sustainable, universally accessible and socially inclusive communities and which harnesses the strengths associated with scale to maximise economic opportunities and supports investment.

1.4 - Core Strategy Context

7. It is recommended to Amend the Core Strategy Map Figure 1.6

Amend the Core Strategy map to insert an icon for the District centre at Westside.

Chapter 2: Climate Action

2.1 - Context		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-59 John Brennan	<p>Submissions call for Galway to become a model city for climate action and sustainable development and necessity for council members to provide strong leadership in this regard.</p>	<p>CE Response</p> <p>The contents of the submissions are noted. The Strategic Vison and Strategic Goals for the city set out in Chapter 1 set out the aspirations of the draft plan for the city during the lifetime of the plan and beyond including to be '<i>a city that is environmentally responsible, mobilised to combat climate change and resilient to challenge</i>'.</p>
GLWC-C2-80 Conor Dowd	<p>Reference to section 15.3.2 of the Climate Action Plan 2021 with references to planning policy in reducing greenhouse gas emissions including: Reduce demand for travel by car, travel distances, and journey times; Increase travel choices, reduce car dependency, and mitigate traffic congestion; Reduce air pollution and promote cleaner and more active modes of transport; Sustain economic and social activity at street level creating vibrant communities; Increase access to shops, employment, transport services, and local amenities; Reallocate road space from the private car to prioritise walking, cycling and public transport; Enhance permeability for active travel; Delivering safer walking and cycling routes to encourage greater uptake of active transport; Encouraging lower speeds, employing stronger speed limit enforcement or in time, reviewing default speed limits; Reduce parking provision and/or increasing parking fees, and implement low emission zones.</p> <p>Reference to support for the 15 minute City concept by 'promoting and supporting communities in which people can live and access most of their daily needs within a 15 -minute journey, mainly by sustainable modes (public transport, cycling and walking) in the Climate Action Plan."</p>	<p>Climate action is a cross cutting theme of the draft plan. See Section 2.4 Integrating Climate Action into the City Development Plan, Table 2.1 for a summary of key policy measures incorporating climate adaptation and mitigation measures within the Plan. Policy support for initiatives referenced in Section 15.3.2 of the Climate Action Plan 2021 is integrated throughout the draft plan. In particular Policy 4.2 Land use and transportation; Policy 4.3 Public Transport; Policy 4.4 Sustainable Mobility; and Policy 4.5 Transport Demand Management Measures.</p> <p>In addition the draft plan supports the implementation of the GTS, which includes for a range of measures that focus on an integrated and sustainable transportation solution with a strong objective to reduce car dependency in favour of public transport and active modes.</p> <p>Low emission zones</p> <p>Low emission zones have been identified in the Climate Action Plan 2021 (CAP 2021) as a means to reduce internal combustion engine journeys as part of a broader effort to increase the system efficiency and demand management in the transport network. Actions in CAP 2021 support the examination of feasibility of low emission zones in</p>

		<p>Irish cities but as yet there is currently no legislation in place to support their implementation.</p> <p>15 Minute City</p> <p>The 15 Minute City concept is a core component of Section 3.4 Sustainable Neighbourhood Concept. Policy is included throughout the Plan to encourage the provision of local services and community facilities can be accessed via walking, cycling or public transport within 15 minutes. See also Policy 3.3 Sustainable Neighbourhood Concept, Policy 4.2 Land Use and Transportation, Policy 6.1 General policy and Policy 6.12 Retail Hierarchy.</p> <p>CE Recommendation</p> <p>Amend references to Climate Action Plan 2019 to ensure all references align to Climate Action Plan 2021. See response to submission no. 179</p>
GLWC-C2-148 Galway City Community Network	Climate Emergency	CE Response
GLWC-C2-228 Galway Environmental Network	Submissions request that the development plan reflect the urgency regarding the climate and biodiversity crises, accept that climate breakdown presents an existential threat to humanity and declare a climate and biodiversity emergency that requires immediate action and transformative change in order to meet 2030 climate targets. The submission also requests that adequate resources are made available to meet the aims of the development plan and clear targets are established and a vision for Galway City in 2100 is developed.	The concerns raised in relation to the climate and biodiversity crisis and the need for urgent action are acknowledged. Section 2.1 Context refers to the climate and biodiversity crisis and acknowledges that urgent action is required during the life span of the plan to meet emissions reduction targets.
GLWC-C2-227 Brendan Mulligan	Reference to good practice outlined in the OPR Case Study Paper CSP05 - Climate Action and the Local Authority Development Plan including: Build an evidence base; set measurable targets; identify co-benefits; ensure policy consistency across the Plan; and promote stakeholder collaboration.	The draft plan accords with the strategic framework of the NPF, RSES and the National Climate Objective as set out in the Climate Action and Low Carbon Development (Amendment) Act 2021. Climate action is a cross cutting theme of the draft plan. See Section 2.4 Integrating Climate Action into the City Development Plan, Table 2.1 for a summary of key policy measures incorporating climate adaptation and mitigation measures within the Plan. A Baseline Emissions Inventory (BEI) for the city is currently being prepared in conjunction with an Energy Masterplan and

		<p>Implementation Plan for the Decarbonisation Zone. In addition the council will be preparing a Local Authority Climate Action Plan.</p> <p>The BEI will provide a baseline for the city to monitor progress to achieving targets. It will provide an evidence base to inform sectors in Galway City in developing their targeted policy and objectives for key sources of emissions in Galway City, including the reduction of emissions within the control of Galway City Council. The BEI will inform the development of an Energy Masterplan, Implementation Plan for a decarbonising zone and the Local Authority Climate Action Plan.</p>
GLWC-C2-79 SAUTI-Youth project, Youth Work Ireland Galway	Submission advocates for more meaningful engagement with young people in the development of climate adaptation and mitigation policies. Decisions made now will greatly impact on their future yet they do not have any input. Need for channel by which young people can interact meaningfully with the council. Reference to Wicklow Co. Council Climate Action, Environment, Recreation & Amenity SPC which includes a young person's representative. Consultation methodology needs to be more inclusive.	<p>CE Response</p> <p>The contents of this submission are acknowledged. The council agrees that the participation of young people is important. However it is noted that this is a broader issue than the development plan. Consultation with young people was carried out during pre-draft plan stage as part of statutory consultation and the views of young people, in tandem with the findings of the Stage 1 Pre-Draft consultation exercise informed the draft plan.</p> <p>There will be a further opportunity to participate in the development of local climate action policy during the public consultation phase of the preparation of the Local Authority Climate Action Plan.</p> <p>Membership of Strategic Policy Committees (SPCs) is set out in Guidelines for establishment and operation Corporate Policy Groups And Strategic Policy Committees (2014) and is outside the remit of the development plan. However there is potential to engage through PPN structure as a community representatives on the SPC.</p>
GLWC-C2-228 Galway Environmental Network	Submission requests that a carbon budget be allocated to Galway City's functional area pro-rata to the Global Carbon Budget.	<p>CE Response</p> <p>Ireland's first carbon budget programme, comprising three 5-year budgets (2021-2025; 2026-2030; and 2031-2035), came into effect on 6 April 2022. Section 6B(12) of the Climate Action and Low Carbon Development Amendment Act 2021. The Minister for the Environment, Climate and Communications is due to sign off on sectoral emissions</p>

		ceilings for relevant sectors of the economy in the coming weeks. Policy 2.2.6 Climate Action provides support for national sector emissions ceilings and carbon budgets once adopted.
GLWC-C2-230 Dept. Housing, Local Government and Heritage	The National Monuments Service recommend that policy be included in Chapter 2 in relation to climate change and archaeology, architectural and cultural heritage, including appropriate adaptation, identification of heritage at risk from climate change; to undertake climate change vulnerability assessments; to develop disaster risk reduction policies; to develop resilience and adaptation strategies for the built and archaeological heritage and to develop the range of skills within the local authority to address climate change issues which affect historic sites and structures.	<p>CE Response</p> <p>The primary responsibility for the identification of heritage assets at risk from climate change lies with the DHLGH and the National Monuments Service. The council is committed to working in conjunction with the DHLGH and the NMS to mitigate risk to historic sites and structures associated with climate change. In addition the forthcoming Galway City Heritage Plan will support this process.</p> <p>Policy 2.2.1 Climate Action of the draft plan provides support for sectoral adaptation plans which would include implementation of the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage. The Strategic Flood Risk Assessment (SFRA) accompanying the draft plan highlights areas vulnerable to flood risk in the City which would indicate areas vulnerable to climate change. Implementation of Corrib go Costa Galway flood defenses scheme will contribute to a reduction in climate change vulnerability and contribute to risk reduction.</p> <p>The draft plan provides policy support for the forthcoming Local Authority Climate Action Plan (LACAP). As part of the preparation of LACAP the council will gather a range of information to develop an evidence-based approach to climate risk assessment which will identify and prioritise current and future risks.</p>
GLWC-C2-230 Dept. Housing, Local Government and Heritage	<p>The Department recommends the inclusion in Chapter 2 an objective to ensure the protection, restoration and enhancement of biodiversity during plan implementation to increase the resilience of natural and human systems to climate change.</p> <p>The Department recommends an objective to undertake a Climate Risk Assessment of the new development plan.</p>	<p>CE Response</p> <p>Biodiversity protection</p> <p>Climate action is a cross cutting theme of the draft plan, see Section 2.4 Integrating Climate Action into the City Development Plan, Table 2.1 for a summary of key policy measures incorporating climate adaptation and mitigation measures within the plan.</p>

	<p>The Plan supports the implementation of the National Biodiversity Action Plan and provides specific policy support for the protection and restoration of biodiversity Policy 5.2 The Green Network.</p> <p>Climate risk assessment</p> <p>Action 457 of Climate Action Plan 2021 (CAP 2021) commits to further develop Ireland's national climate change risk assessment capacity to identify the priority physical risks of climate change to Ireland. To date no methodology has been published. It is considered premature to consider the preparation of a climate risk assessment of the development plan in the absence of guidance.</p> <p>In the interim, draft plan policies have been developed to minimise climate risk and align with the objectives of the CAP 2021. Specific Development Standard 11.30 requires a Climate - Scheme Sustainability Statement for all planning applications involving developments of 25 or more homes or over 500sqm of gross retail, commercial/office development in urban areas; or enterprise and employment developments over 1,000m² gross. It is considered appropriate to include the requirement for a Scheme Sustainability Statement for other projects as deemed appropriate.</p> <p>CE Recommendation</p> <p>Amend Section 11.30 Climate - Scheme Sustainability Statements, Paragraph 2 and insert text in green.</p> <p>All planning applications involving developments of 25 or more homes or over 500sqm of gross retail, commercial/office development in urban areas; or enterprise and employment developments over 1,000m² gross and other projects, as deemed appropriate should be accompanied by a Scheme Sustainability Statement</p>
GLWC-C2-179 Department of the Environment, Climate and	<p>Submission supports approach to climate action in the Draft Plan is noted and welcomed, Table 2.1 is a useful addition to the Draft Plan in that it clearly sets out the key policy measures proposed to address climate action and mitigation. Submission requests that the Draft Plan be updated to reflect the specific</p> <p>CE Response</p> <p>The contents of the submission are noted.</p> <p>CE Recommendation</p>

Communications	<p>increased ambitions in the revised Climate Action Plan 2021 which has been published. The Climate Action Plan 2021 set out Irelands increased ambitions with respect to a range of issues (for instance, renewable energy targets have increased from 70% to 80% from the 2019 Plan).</p>	<p>Amend draft plan to ensure consistency with targets set out in the Climate Action Plan 2021.</p> <p>Delete text with strikethrough and insert text in green</p> <ul style="list-style-type: none"> - Amend Section 2.2 Climate Change International and European Context, National Context and Legislation paragraph 1. <i>It follows through on Ireland's increasingly ambitious commitments in the area of climate action, which were included for in the Programme for Government and the 2019 Climate Action Plan. annual Climate Action Plan.</i> - Amend Section 2.2 Climate Change International and European Context, National Context and Legislation paragraph 3. The Climate Action Plan prepared in 2019 under legislation is now required to be updated annually. The plan is required to set a roadmap of sector-specific actions to comply with the carbon budget programme and sectoral emission ceilings and other actions necessary to support government policy on climate change. It currently includes for over 180 actions across a range of sectors including electricity, enterprise, built environment, transport, agriculture, forestry and land use, and waste and the circular economy. The plan also acknowledges the need for a just transition and the need to build climate resilience in all communities. The Climate Action Plan (CAP), first prepared in 2019 sets out a roadmap to deliver a 51% reduction in Ireland's overall greenhouse gas emissions from 2021 to 2030, and to achieving net-zero emissions no later than 2050. Under legislation the Climate Action Plan is required to be updated annually to accommodate new and emerging technologies, changing scientific consensus and evolving government climate action policy. The CAP must also comply with the carbon budget programme and sectoral emission ceilings and other actions necessary to support government policy on climate change. The CAP also acknowledges the need for a just transition and the need to build climate resilience in all communities.
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	<p>Amend Section 2.2 Climate Change International and European Context, National Context and Legislation para. 11 The transition to a Circular Economy is an action under the Climate Action Plan 2019 that will form part of Ireland's transition to a climate resilient economy. Amend Section 2.2 Climate Change International and European Context, Local Context – Galway City, para. 10 It is anticipated with this prescribed timeline that the City Council will commence preparation of the Local Climate Action Plan before the end of 2022. Amend Policy 2.2.1 The Climate Action Plan (2019) and any updated plan; The annual Climate Action Plan Amend Policy 3.1.24 Ensure delivery of housing contributes to meeting the objectives for emission targets in line with national legislation and imminent National Climate Action Plan.</p>
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2.2 - Climate Change International and European Context

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-11 Rethink Consumption	Submissions highlight a lack of reference to the Decarbonisation Zone in the Draft Plan and that the Plan should make explicit reference to the objectives of the Decarbonising Zone to facilitate oversight and monitoring.	CE Response Decarbonising Zone The Decarbonising Zone (DZ) is referred to in Section 2.2 Climate Change International and European Context of the draft plan. Policy support for the DZ is provided by Policy 2.2.9 Climate Action: <i>Support the designated and any future Decarbonising Zone (DZ) in the city and associated implementation plan promoting measures to reduce Greenhouse Gas (GHG) emissions and improve general environmental conditions in this area.</i>
GLWC-C2-80 Conor Dowd	Submissions call for a commitment to fund the implementation of the Decarbonisation Zone and to establish a baseline of the current greenhouse gas emissions within Galway City's functional area to measure the progress toward achieving the objectives of the Climate Action Plan 2021 / 51% reduction in GHG emissions.	
GLWC-C2-228 Galway		

<p>Environmental Network</p> <p>GLWC-C2-156 Lidl Ireland GMBH</p>	<p>Submission received from Lidl welcomes initiatives that encourage reductions in energy use such as the Decarbonisation Zone. Submission requests that the designation should not represent a barrier to development or arbitrarily increased demands and costs compared to a location elsewhere in the City. All policies and objectives relating to the zone should be positive and proactive, and incentive based, rather than restriction or standard based. For example, Development Contributions or Rates charges could be brought forward to encourage 'over compliance' with national building regulations and standards. The development plan should also be clear in that it does not seek to supplant the primacy of national building regulations and standards.</p>	<p>In addition, development standards set out in Chapter 11 including: Section 11.18 Renewable Energy Sources, Section 11.19 Green Design & Surface Water/SuDS and Section 11.30 Climate - Scheme Sustainability Statements will contribute to low emission development in the city.</p> <p>Monitoring / Baseline</p> <p>Galway City Council is currently preparing a Baseline Emissions Inventory (BEI), Energy Masterplan for the city and Implementation Plan for the Decarbonising Zone. The BEI will provide a baseline of emissions in the city and facilitate monitoring of progress toward achieving the objectives of the Climate Action Plan 2021 / 51% reduction in GHG emissions and to measure impact of initiatives set out in the DZ Implementation Plan. Sectoral targets associated with the Climate Action Plan 2021 will also be referenced at local level in the council's Local Authority Climate Action Plan and Energy Masterplan. Pathways for decarbonisation at a local level will be explored in the Energy Master Plan and the Implementation Plan for Decarbonising Zone.</p> <p>Funding</p> <p>The National Development Plan 2021-2030 commits €165 billion to support the transition to a low carbon society. The Climate Action Fund will fund initiatives to achieve climate and energy targets. In addition the URDF and Disruptive Technologies Fund will also support climate action.</p> <p>The support for the Decarbonising Zone (DZ) is noted. The designation of a DZ is intended to be positive where local stakeholders will work in partnership to reduce greenhouse gas emissions by 51% by 2030 in accordance with national targets. Policy in this regard is not intended to be restrictive and will align with national policy, targets, building regulations and development standards set out in Chapter 11. The points raised regarding development contributions and rates are noted and are outside the scope of the development plan.</p>
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GLWC-C2- 148 Galway City Community Network	Climate Action	CE response
GLWC-C2- 132 NUI Galway	<p>The submission requests that the following are included under Policy 2.2 Climate Action:</p> <p>The establishment of a Galway City Climate and Biodiversity Council, reflecting the National Climate Council.</p> <p>Develop and enhance collaborative work with Galway County Council as a priority on tackling climate change in Galway.</p> <p>Produce a clear and detailed plan for how Galway will reduce its emissions by 51% by 2030 with appropriate targets and timescales, reflecting the national target. This should include an assessment of the resource impact of industries.</p> <p>Provide for measurement of emissions with an initial focus on developing baseline data for the City against which progress/regress can be assessed. (p.51)</p> <p>Develop a comprehensive plan including targets and specific timescales for flood prevention and mitigation for the city, based on stakeholder participation, with development of Green Infrastructure and Nature-Based Solutions.</p> <p>NUI Galway would welcome the inclusion of the following policy in the forthcoming development plan into Policy 2.2: Under the Climate Action Plan 2019 Third level sector organisations are to become centres for Climate Mitigation and Learning as exemplars for other sectors to follow, NUI Galway and Galway City to partner to develop Galway City and University as a leading exemplar following the Lead, Learn, Live philosophy as set out in the NUI Galway Strategic Plan 2020-2025"</p>	<p>The contents of the submission are noted. Regarding proposed changes to Policy 2.2 Climate Action, the establishment of the Galway City Climate and Biodiversity Council is outside the remit of the development plan.</p> <p>The transition to a low carbon climate resilient society will require collaboration across all stakeholders. Galway City Council in partnership with local stakeholders will prepare and deliver an implementation plan for the Westside Decarbonisation Zone.</p> <p>Galway City Council is currently preparing a Baseline Emissions Inventory (BEI), Energy Masterplan for the city and Implementation Plan for the Decarbonising Zone (DZ). The BEI will provide a baseline of emissions in the city and facilitate monitoring of progress toward achieving the objectives of the Climate Action Plan 2021 (CAP 2021) which include a 51% reduction in GHG emissions and measure impact of initiatives set out in the DZ Implementation Plan. Sectoral targets associated with the CAP 2021 will also be referenced at local level in the council's Local Authority Climate Action Plan and Energy Masterplan. Pathways for decarbonisation at a local level will be explored in the Energy Master Plan and the Implementation Plan for Decarbonising Zone.</p> <p>The CFRAMs/Coirib go Cósta – Galway City Flood Relief Scheme will incorporate Nature Based Solutions. Policy 9.4 Sustainable Urban Drainage Systems (SuDS) address Sustainable Urban Drainage Systems (SuDS) as a means of surface water management. In addition, Policy support for the development Green Infrastructure (GI) and Nature Based Solutions (NBS) is included throughout the Draft Plan (Policies 2.2 Climate Action, 5.1 Green Network and Biodiversity and Specific Obj. 4.8.13 Sustainable Mobility-Walk and Cycle) and Development Guidance set out in Section 11.19 – Green Design and Surface Water / SuDS.</p> <p>The request by NUI Galway is noted and it is recommended the following text be included as Policy 2.2.17: Support the Third level</p>

		<p>sector organisations are to become centres for Climate Mitigation Centres.</p> <p>CE Recommendation</p> <p>Addition of Policy 2.2.17: Support the Third level sector to become centres for Climate Mitigation and Learning.</p>
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2.3 - Planning & Sustainability - Achieving Sustainable Planning Outcomes

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-11 Rethink Consumption	Submissions calls for targets to address climate action to be set out in the Sustainable Mobility and Transportation chapter.	<p>CE Response</p> <p>See Appendix 1: Monitoring and Implementation.</p>
GLWC-C2-148 Galway City Community Network	<p>Submission requests modifications to Policy 2.3 – Renewable Energy including:</p> <ol style="list-style-type: none"> 1. Include measures to address energy poverty within the plan. 2. Collaborate with communities, with a particular focus on socio-economically marginalised communities, on developing decarbonising zones and low carbon communities. 3. Collaborate with the Galway Energy Cooperative and local communities to develop an Energy Master Plan for the city. 4. Maximise potential of solar energy and microgeneration on domestic, commercial, industrial, community and public buildings. 5. Encourage micro grids in new neighbourhoods 6. Re-establish hydro power generation infrastructure on canals and River Corrib. Potential for turbines to be installed at various locations to supply both the city as a whole / and or specific neighbourhoods. 	<p>CE response</p> <p>The transition to a low carbon society and implementation of policies and objectives in the development plan include Policy 2.4 Sustainable Building Design and Construction, will support energy efficient building design and retrofitting of existing building stock. This will reduce costs associated with heating and cooling and reduce fuel poverty. At neighborhood level Policy 3.3 Sustainable Neighbourhood Concept supports the efficient layout of residential developments to minimize energy use through design, layout and use of renewable or low carbon energy sources including Combined Heat and Power (CHP) systems from low carbon energy sources and district heating.</p> <p>The council will work in partnership with local stakeholders including public bodies, utility providers, community groups, schools, Galway Energy Co-op and NUI Galway to prepare and deliver an implementation plan for the Decarbonisation Zone. This process will also include the preparation of the Baseline Emissions Inventory and Energy Masterplan for the City.</p>
GLWC-C2-228 Galway Environmental Network		
GLWC-C2-230 Dept. Housing, Local		

Government and Heritage	7. Make provision for district heating as a utility throughout the city to enable householders to switch from fossil fuel heating systems as a climate change mitigation measure.	Chapter 9 and Policy 2.3 Renewable Energy of the draft plan recognise the potential of small scale/microgeneration of electricity. Exemptions from planning permission are provided for the installation of micro scale renewable energy infrastructure in domestic dwellings, business premises and industrial settings including solar panels, heat pumps, wind turbines and CHP systems. Within the wider context of developing renewable energy infrastructure consideration will also be given to the development of hydro electric energy schemes.
GLWC-C2-11 Rethink Consumption	The Department recommends that Policy 2.3 Renewable energy should include a requirement for biodiversity protection.	
GLWC-C2-199 Shauna Spillane	Submissions call for demonstration projects on existing commercial and residential developments to reduce energy consumption and the adoption of solar PV throughout the city with a target to provide 50 publicly visible PV installations totaling 2MW. Develop hydroelectric power at Nun's Island and showcase as an example of the potential of hydroelectric power in the city.	The Energy Masterplan for the city will identify opportunities for decarbonising projects e.g. the development of renewable energy projects and district heating. Section 9.13 Energy and Associated Infrastructure, Renewable Energy references that the development of small scale renewable energy is supported with the proviso that there are no adverse environmental impacts. Further guidance on the development of renewable energy is provided under Development Standards Section 11.18 Renewable Energy Sources.
GLWC-C2-228 Galway Environmental Network	Submissions request that the Development Plan refer to and support retrofitting of local authority housing stock.	CE Response Galway City Council Housing Section is participating in the Social Housing Retrofitting Scheme. In addition Policy 2.4.4 Sustainable Building Design and Construction provides support for the retrofitting of social housing stock in conjunction with other stakeholders.
GLWC-C2-211 SSE plc		Policy 2.4.4 Sustainable Building Design and Construction: <i>Liaise with the SEAI and other agencies to develop standards, procedures and targets for energy conservation in the Council's housing stock</i>
GLWC-C2-118 Ibec	Submission states that significant investment and smart policymaking will be needed in the coming years to ensure economic growth in the Galway region is decoupled from environmental harm. Issues like climate change, waste circularity, air pollution, and water quality need	CE Response The points raised are noted. The draft plan has been prepared in alignment with objectives set out in the NPF, RSES and MASP which support the transition to a low carbon society. Climate action is a cross

<p>to be central considerations in the Development Plan. With the right approach Galway has an opportunity to become a leader in sustainability and a destination for green investment, talent and purpose driven tourism, all while improving the quality of life and economic wellbeing of citizens.</p> <p>Submission refers to legally binding targets under the 2021 Climate Act to achieve a carbon neutral economy by 2050 and a 51% reduction in emissions by 2030 (on 2018 levels). To meet our 2030 target, Ireland cannot emit more than 295 million tonnes of CO₂e over the five-year period to 2025, and 200 million tonnes between 2026 and 2030. For an economy that emitted 68.3 million tonnes in 2018 (the reference year), this means average annual emissions must fall by 4.8% between now and 2025, and by 8.3% between 2025 and 2030. Putting this challenge in perspective, emission only fell by 3.6% in 2020 – during a year of enforced economic shutdown. Meeting this trajectory in a way that does not suppress growth will require enormous investment, society-wide behavioural change, mass fuel switching, and some very timely innovations.</p> <p>The submission notes that only through an escalation in sustainable investment, and a major transformation of Irish society, will we be able to deliver the emissions reduction needed to meet our new targets and play our part in the global effort to combat climate change. A cleaner and more resilient environment brings both societal and economic benefits. Climate proofing is critical to ensure that the Galway City Development Plan is effective and to allow the delivery of a low carbon, climate resilient, and environmentally sustainable economy.</p> <p>Submission requests that the Development Plan facilitate the incorporation of long-term emissions considerations in planning and infrastructure decisions across Galway City and support the increase in use of renewable energy and development of renewable energy infrastructure.</p>	<p>cutting theme of the draft plan, see Section 2.4 Integrating Climate Action into the City Development Plan, Table 2.1 for a summary of how policy is integrated into each chapter to support transition to a low carbon society. The draft plan also supports the National Climate Objective and investment across all sectors to meet climate targets.</p> <p>Legally binding carbon budgets and sectoral emissions ceilings were introduced in the Climate Action and Low Carbon Development (Amendment) Act 2021 and will form part of the Climate Action Plan 2022. Policy 2.4 Sustainable Building Design and Construction supports the retrofit and reuse of existing buildings rather than demolition. This is further supported through SEAI grant funding which encourages retrofitting to avoid demolition and reconstruction with high embodied carbon.</p>
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GLWC-C2-179 Department of the Environment, Climate and Communications	<p>Submission supports the inclusion of Policy 2.3.5 (and Policy 9.10) – supporting the grid infrastructure for both renewable energy and the gas transmission and Policy 2.3.5 supporting the development of appropriate land-based infrastructure to support offshore renewable energy projects.</p> <p>Submission requests that Renewable Energy Policy 2.3 make references to the national capacity targets and any local renewable energy generation targets from any source and that their inclusion would be in line with the requirements of the provisions of SPPR 4(2) of the “Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change” (Department of Housing, Local Government and Heritage, 2017).</p> <p>Submission supports policies relating to the Marine Sector and Renewable Energy but requests that the Council considers the following additional text: <i>Policy 2.3.6: Support the development of appropriate land-based infrastructure at suitable locations in the city to support off-shore renewable energy production subject to adequate visual, environmental and ecological protection in accordance with the ‘Offshore Renewable Energy Development Plan’ (OREDP) published in 2014 by the Department of Communications Energy and Natural Resources (and subsequently reviewed in 2018) and any successor thereof.</i></p>	<p>CE Response</p> <p>Support for Policy 2.3.5 Renewable Energy and Policy 9.10 Energy and Associated Infrastructure is welcomed.</p> <p>It is the view of the CE that the inclusion of local renewable energy generation targets would be premature consequent to assessment of the opportunities for renewable energy in Galway City as part of the Energy Master Plan. It is anticipated that the development plan will be varied to incorporate any local renewable energy generation targets that may be adopted as part of the Local Authority Climate Action Plan.</p> <p>The comments on Policy 2.3.6 Renewable Energy are noted. Support for the development of off-shore renewable energy production is implicit in the policy and is further expanded on in Section 4.7 Galway Port and Section 6.3.9 Marine Sector & Renewable Energy. The provision of renewable energy infrastructure requires compliance with a range of national policies and plans. It is considered restrictive to name the <i>Offshore Renewable Energy Development Plan (OREDP)</i> in isolation.</p> <p>CE Recommendation</p> <p>Amend references to Climate Action Plan 2019 to ensure all references and targets align with Climate Action Plan 2021. See response to submission no. 179.</p>
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2.4 - Integrating Climate Action into the City Development Plan		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-199 Shauna Spillane GLWC-C2-228 Galway Environmental Network	<p>Current plan lacks tangible objectives and outcomes which are to be achieved in terms of climate action and adaptability. I think more detail needs to be given as to what specific initiatives should be introduced to ensure Galway will adapt for renewable future.</p> <p>Focus on achieving the target to achieve a 51% reduction in emissions by 2030 in the Climate Action Plan 2021.</p> <ul style="list-style-type: none"> • Ensure the policies and objectives in the GCDP are consistent with the Climate Action Plan 2021 target to achieve a 51% reduction in emissions by 2030. • Assess every policy in the GCDP 2023-2029 in terms of its contribution to reducing greenhouse gas emissions and achieving the Climate Action Plan 2030 target and net zero by 2050. • Exclude any policy that is not consistent with achieving a 51% reduction in greenhouse gas emissions by 2030 and net zero carbon by 2050 or would increase greenhouse gas emissions. • Not permit any developments that would increase greenhouse emissions. • Favour developments that will decrease greenhouse gas emissions. • Focus all new development on existing infill, brownfield and regeneration sites in the city. • Exclude any development on existing greenfield sites. 	<p>CE Response</p> <p>The points raised in the submissions are noted. The development plan is subject to a program of ongoing monitoring of implementation of key outcomes. Appendix 1: Implementation and Monitoring will set out the Core Strategy Monitoring Framework. In addition, monitoring of environmental indicators will take place over the lifetime of the Plan. Sectoral targets associated with the National Climate Action Plan 2021 will be reflected at local level in the Local Climate Action Plan, Energy Masterplan. The Baseline Emissions Inventory (BEI) will establish GHG baseline to enable monitoring of impacts of initiatives. The implementation of the Galway Transport Strategy (GTS) will also enable monitoring of modal shift, provision of active travel infrastructure and the impact of behavioral change and demand management measure.</p> <p>It is the view of the CE that the inclusion of targets would be premature consequent to the preparation of the Local Authority Climate Action Plan. It is anticipated that the development plan will be varied to incorporate targets as set out in the Local Authority Climate Action Plan which will align with national targets and carbon budgets which will place increasing stringent restrictions on emissions.</p> <p>The Core Strategy sets out a land use strategy to enable the vision for Galway City to transition to a low carbon, climate resilient city through a strategy for compact growth, increased integration between land use and transportation, increased sustainable mobility opportunities and the sustainable use and management of environmental resources.</p> <p>The draft plan is aligned with policy objectives set out in the NPF, RSES and MASP. The NPF envisages the population of</p>

		Galway City and Suburbs to grow by between 40,000 - 45,000 people by 2040 which is an increase of almost 55%. The draft plan reflects the NPF target that 50% of new residential development be located within the existing built footprint, on lands which include key regeneration/brownfield sites, infill sites and underutilised lands at locations that are well served by existing and planned public transport.
GLWC-C2-189 Galway National Park City initiative	<p>Green and Sustainable Development</p> <p>Submission makes reference to ensuring planning regulations that encourage green features such as the use of renewable energies, rooftop/vertical gardens, rainwater collection systems, and community green space or native planting areas.</p> <p>Submission advocates for support of new green and sustainability business opportunities and activities, building of affordable green and sustainable homes, the installation of a network of open data air and water quality sensors both with and without a Citizen Science element and progress towards a renewable energy infrastructure and system in Galway City.</p>	<p>CE Response</p> <p>The Planning and Development legislation includes exemptions, subject to certain criteria, to support the development of renewable energy. Section 11.30 Climate - Scheme Sustainability Statements requires that all planning applications involving developments of 25 or more homes or over 500m² of gross retail, commercial/office development in urban areas; or enterprise and employment developments over 1,000m² gross are accompanied by a <i>Climate Scheme Suitability Statement</i> to demonstrate how climate adaptation and mitigation measures have informed the development proposal.</p> <p>Policy 6.1 General policy provides for support for the diversification of the city's economy to maximise high value job opportunities and facilitate a just transition. Policy 9.9 supports the roll out of a digital infrastructure and smart sensor network to provide real time data. Policy 2.3 Renewable Energy supports the development of renewable energy infrastructure at various scales throughout the city.</p>

Chapter 2: CE Recommendations

Delete text with ~~strikethrough~~ and insert text in green

2.1 - Context

1. Amend Draft Plan to ensure consistency with targets set out in the Climate Action Plan 2021.
 - Amend Section 2.2 Climate Change International and European Context, National Context and Legislation para. 1.

It follows through on Ireland's increasingly ambitious commitments in the area of climate action, which were included for in the Programme for Government and the 2019 Climate Action Plan—annual Climate Action Plan.
 - Amend Section 2.2 Climate Change International and European Context, National Context and Legislation para. 3

~~The Climate Action Plan prepared in 2019 under legislation is now required to be updated annually. The plan is required to set a roadmap of sector specific actions to comply with the carbon budget programme and sectoral emission ceilings and other actions necessary to support government policy on climate change. It currently includes for over 180 actions across a range of sectors including electricity, enterprise, built environment, transport, agriculture, forestry and land use, and waste and the circular economy. The plan also acknowledges the need for a just transition and the need to build climate resilience in all communities.~~

The Climate Action Plan (CAP), first prepared in 2019 sets out a roadmap to deliver a 51% reduction in Ireland's overall greenhouse gas emissions from 2021 to 2030, and to achieving net-zero emissions no later than 2050. Under legislation the Climate Action Plan is required to be updated annually to accommodate new and emerging technologies, changing scientific consensus and evolving government climate action policy. The CAP must also comply with the carbon budget programme and sectoral emission ceilings and other actions necessary to support government policy on climate change. The CAP also acknowledges the need for a just transition and the need to build climate resilience in all communities.
 - Amend Section 2.2 Climate Change International and European Context, National Context and Legislation para. 11

~~The transition to a Circular Economy is an action under the Climate Action Plan 2019 that will form part of Ireland's transition to a climate resilient economy.~~
 - Amend Section 2.2 Climate Change International and European Context, Local Context – Galway City, para. 10

~~It is anticipated with this prescribed timeline that the City Council will commence preparation of the Local Climate Action Plan before the end of 2022.~~
 - Amend Policy 2.2.1

~~The Climate Action Plan (2019) and any updated plan;~~
The annual Climate Action Plan
 - Amend Policy 3.1.24

Ensure delivery of housing contributes to meeting the objectives for emission targets in line with national legislation and ~~imminent~~ National Climate Action Plan.
2. Amend Section 11.30 Climate - Scheme Sustainability Statements, Paragraph 2 and insert text in green.

All planning applications involving developments of 25 or more homes or over 500sqm of gross retail, commercial/office development in urban areas; or enterprise and employment developments over 1,000m² gross ~~and other projects, as deemed appropriate~~ should be accompanied by a Scheme Sustainability Statement

2.2 - Climate Change International and European Context

3. Amend Policy 2.2.5 Climate Action [OPR]
Prepare and make a five year Local Authority Climate Action Plan in accordance with the Climate Action and Low Carbon Development Amendment Act 2021 and future supporting guidelines. ~~and consequently~~ Review the development plan to ensure alignment consistency with the Local Authority Climate Action Plan and future climate action policy and guidance and if required bring forward a variation of the plan.
4. Addition of Policy 2.2.17 Climate Action: Support the Third level sector to become centres for Climate Mitigation and Learning

2.3 - Planning & Sustainability - Achieving Sustainable Planning Outcomes

5. Amend narrative in Section 2.3 Planning & Sustainability – Achieving Sustainable Planning Outcomes, Renewable Energy (Mitigation) para. 2 to include reference to ~~low carbon district heating, waste heating recovery and utilisation~~ [OPR]

Potential also exists ~~for examining to examine low carbon district heating, waste heating recovery and utilisation~~ opportunities within the city particularly in newly designated areas such as Ardaun and in some of the regeneration sites.

6. Amend Policy 2.2.5 Climate Action [OPR]
Promote small scale, on-site energy development, where energy generated is primarily required to meet the needs of households, communities and businesses to reduce their carbon emissions. Examples could include micro wind/solar energy generation, ~~low carbon~~ district heating, ~~waste heating recovery and utilisation~~, geothermal and air to water energy technologies.

Chapter 3: Housing and Sustainable Neighbourhoods

3.1 - Context		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-118 Ibuc	<p>Planning Capabilities for Housing Delivery</p> <p>Problems associated with the planning process threatens the ability to deliver the target for homes in Galway city over the next six years.</p> <p>Legislative changes are urgently needed to ensure judicial reviews become the exception, not the norm.</p> <p>Galway City Council will be required to work constructively with all stakeholders to ensure that the new planning process for Large-Scale Residential Developments is an effective replacement for the Strategic Housing Development process.</p> <p>Planning capabilities at local authority level have been reduced over recent years. A programme to upskill existing local authority staff is needed to provide a more active role in performing planning including forward planning, regulatory policy, development management and enforcement.</p> <p>Sharing of planners and other specialist skills between local authorities must be encouraged.</p>	<p>CE Response</p> <p>The issues raised are matters that are outside the scope of the plan and require changes in legislation, are matters for the local authority service delivery and training plan and are matters allied to resourcing of local authorities.</p>
GLWC-C2-228 Galway Environmental Network	<p>Design Standards</p> <p>Establish a design review panel of experts (architects, urban designers, master planners, landscape architects, and researchers) to review key proposed developments.</p> <p>Encourage and reward innovative housing design to incentivize high quality and mixed housing types in developments (possibly by allowing derogation from the housing standards / guidelines).</p>	<p>CE Response</p> <p>This submission is noted. Planning applications are referred to prescribed bodies who have a range of expertise in their particular fields and their specialist advice is taken into consideration. In certain cases, specialist expertise is employed to give advices to the local authority.</p> <p>Policy supports innovative design but this should not be at the expense of achieving necessary standards.</p>

	<p>Establish a housing design task force / roundtable sourcing expertise from other local authorities, The Housing Agency, Approved Housing Bodies, Co-operative Housing Ireland, the RIAI, local and national architectural design practice, and from international organisations.</p>	<p>There are a range of initiatives which support collaboration with other agencies at local authority, regional and national level on a wide range of issues including housing and house design.</p>
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3.2 - Housing Strategy

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-37 Galway Age Friendly Alliance	<p>Housing options for older people</p> <p>Evidence shows that people want to 'age in place' within their own homes and communities. The Programme for Government includes a commitment to 'embed aging in place options for older people into the planning system through Development Plans.'</p>	<p>CE Response</p> <p>The draft plan recognizes in Section 3.2 Housing Strategy, the need for and benefits of specialist housing options for older people to support independent / semi-independent living within their own communities.</p>
GLWC-C2-196 COPE Galway		
GLWC-C2-228 Galway Environmental Network	<p>Need for specialist housing options for older people to support independent / semi-independent living within their own communities. Need for the provision of a range of local housing options to facilitate those who want to trade down / downsize. Benefit to the local housing market by freeing up larger homes and reducing under occupancy.</p> <p>Action 4.6 of the Housing Options for our Ageing Population policy statement calls for measures to ensure that 30% of all new dwellings are built to incorporate universal design principles to accommodate our aging population. Section also relevant to 11.B - Development Standards</p> <p>COPE Galway recommends that the Draft Plan include:</p> <p>Commitments that all newly constructed social housing units be designed using universal design principles and lifetime adaptability to support older people to age in place.</p>	<p>CE Response</p> <p>The draft plan recognizes in Section 3.2 Housing Strategy, the need for and benefits of specialist housing options for older people to support independent / semi-independent living within their own communities.</p> <p>It recognizes that universal design and lifetime adaptability supports both older people's needs and the needs of people with disabilities.</p> <p>Policy 3.1 Housing Strategy includes to <i>support the specific housing needs of older people including independent living options as well as semi-independent living options and nursing home accommodation. These facilities should be preferably accommodated within established neighbourhoods and at locations that have good access to community facilities and amenities.</i></p> <p>Policy 3.1 also includes to:</p> <p><i>Enable older people to continue to live in their own homes, through adaption where necessary or a home more suitable to their needs through rightsizing and to promote life time adaptable homes that can accommodate the changing needs of a household over time</i></p> <p>At present neither legislation and/or section 28 guidelines allow the Planning Authority to require a developer to provide a minimum proportion of homes for older people. The Building Regulations, which</p>

<p>New social housing to include smart technology to support older people to continue to live independently.</p> <p>Maintenance issues must be dealt with quickly.</p> <p>Provide commitment to coordinate services for vulnerable older people to ensure they can continue to participate in community life and live in accommodation that is of a suitable standard.</p> <p>Take account of the needs of the disadvantaged, isolated and marginalised, the growing cohort of elderly people, those with chronic illnesses, including those now suffering the effects of "Long Covid" and those with physical and mental disabilities.</p> <p>Provide appropriate support for people who cannot live totally independently due to disabilities, mental or physical, ill-health or infirmity, but do not need to be in full-time residential care, to continue to live in their communities for as long as possible.</p> <p>Ensure there is appropriate accommodation available in communities for those who will support people who can continue to live independently with a measure of support.</p>	<p>are a separate code to the planning code, do place requirements in relation to access and use (under Part M).</p> <p>The draft plan does include in policy 3.1 <i>that Planning applications for multiple housing units will be required to include a Statement of Housing Mix detailing the proposed mix and demonstrating that it provides a sufficient range in unit sizes and types to satisfy community mix including the demographic trend of reduction in average household sizes. The needs of special groups such as older persons and persons with disabilities will be required to be considered as part of this process.</i></p> <p>The council are committed to the delivery of Housing for All and has prepared the Housing Delivery Action Plan 2022-2026 which includes that the provision of Age Friendly and Universal Design homes will form a significant element of planned delivery in line with the Council's Housing Action Plan for Persons with a Disability 2021 – 2026.</p> <p>As part of the Councils Housing Action Plan for Persons with a Disability 2021-2026 adopted by the council in November 2021, the council committed to providing a minimum 5% of all new homes to be specifically constructed to cater for such needs.</p> <p>The council work in tandem with other service providers to provide essential services. While management and operation matters are outside the scope of the plan, the policy framework of the plan supports the delivery of appropriate accommodation and services.</p> <p>It is recommended that additional text be included in Chapter 11 development standards to support policy 3.1 in relation to the requirement for a statement of housing mix.</p> <p>CE Recommendation</p> <p>Amend Section 11, Part B Development Standards and Guidelines to include text in green as follows:</p> <p>Statement of Housing Mix</p>
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		<p>All planning applications involving developments of 25 or more shall be required to include a Statement of Housing Mix detailing the proposed mix and demonstrating that it provides a sufficient range in unit sizes and types to satisfy community mix including the demographic trend of reduction in average household sizes.</p> <p>The Statement of Housing Mix shall outline how the scheme has been designed for the needs of older people and/or persons with a disability and/or lifetime homes.</p> <p>Plans shall clearly identify proposed units that are designed as universal homes.</p>
GLWC-C2-148 Galway City Community Network GLWC-C2-228 Galway Environmental Network	<p>Social Housing</p> <p>GCCN requests that in relation to Policy 3.1 Housing Strategy:</p> <p>The Council will increase the social housing targets to meet projected need given population growth projections including a revision of targets in the Housing Delivery Action Plan 2022-2026 to meet these needs (p.65). This should include options for independent living for older people and disabled people, allowing for a continuum of levels of support.</p> <p>The Council will increase Social and affordable housing provision and delivery for the purposes of the prevention and elimination of homelessness to be a priority of the Galway City Development Plan 2023-2029.</p> <p>The Council will provide for phasing out of long-term leasing for all tenants not just new entrants and put in place measures to provide appropriate accommodation which guarantees security of tenure (p.66).</p> <p>The Council will provide for a minimum of 40% of the unit sizes and types included in new residential developments in Galway City to be one and two bedroom, suitable to meet the housing needs of single/one person households (p.65).</p>	<p>CE Response</p> <p>Many policies relate to housing delivery and not specifically to the city development plan where the Core Strategy and housing strategy are the framework for enabling sufficient lands for housing to meet projected target needs. The HNDA is the evidence based guidance on the likely split in tenure demand and is a tool that can be used to target social housing.</p> <p>The draft plan is prepared in the context of national policy set out in Housing for All. It is recognised that long term leasing as a social housing delivery option is to be phased out under Housing for All. This is reflected in Policy 3.1 which includes to:</p> <p><i>Address the demand for additional social housing and housing delivery supports through a number of means including the construction of housing, direct acquisition of housing, delivery in conjunction with AHBs and the use of the RAS, HAPs, long term leasing, on a cost rental basis, through affordable housing purchase arrangements, shared equity schemes and any other appropriate housing delivery. Long term leasing as a social housing delivery option will be considered as a less favourable model and in accordance with Housing For All, will be phased out for new entrants.</i></p>

	<p>Set annual targets for delivery of social homes and ensure they are met.</p> <p>Set annual targets for delivering genuinely affordable homes and ensure they are met.</p> <p>Ensure publicly owned lands are used for both social and affordable homes.</p> <p>Stop relying on delivery of homes at inflated prices in private developments.</p> <p>Ensure that people have available to them, within their communities, a choice of homes, social homes, genuinely affordable homes and market price homes, that will meet their lifelong needs without having to leave their communities.</p>	<p>In relation to social housing targets and delivery, Housing for All is the guiding document and plans such as the Housing Delivery Action Plan 2022-2026 have been prepared in accordance with Housing for All.</p> <p>In relation to homelessness Policy 3.1 Housing Strategy includes to <i>work with the voluntary, community and public sector in addressing the housing needs of homeless people with the endeavour to eliminate homelessness and having regard to the measures in the West Region Homelessness Action Plan 2020 – 2022 and relevant national policy including those set out in Housing for All - a New Housing Plan for Ireland.</i></p>
GLWC-C2-174 Shining Light Galway	<p>Direct Provision Centres -Living Standards and Conditions</p> <p>Raises concerns about the living standards/ conditions of some of our direct provision centers. We have a big issue in regards to the way we treat those who are most vulnerable, one of the issues is that some residents in the centers are housed in one bedroom accommodations with sometimes two to three children with no living space. Children have no space to play and there's no privacy. Some of the open spaces are filthy and there are broken cables lying around. Some of the residents complain that they are consistently bullied and harassed.</p> <p>It is concerning that the people in these centers are voters in the local elections and yet they are ignored.</p> <p>One of the things that the council could do is to inspect and perhaps audited on a regular basis. We need to protect the people, they are part of the community and we have taken them in with the promise of protecting them and yet we are failing them day by day, month by month, year by year and decays.</p>	<p>CE Response</p> <p>This submission is noted. The direct provision system is outside of the scope of the development plan and is a matter for the Department of Justice.</p>

	The direct provision system has been going on for 22 years. It's time to stop this awful, unlawful injustice in our city.	
<p>GLWC-C2-160 Galway Simon Community</p> <p>GLWC-C2-196 COPE Galway</p> <p>GLWC-C2-228 Galway Environmental Network</p>	<p>Homelessness</p> <p>Requests a new subsection - Eradicating Homelessness to be included within Chapter 3 Housing and Sustainable Neighbourhoods (similar to Traveller Accommodation) in recognition of the importance of this goal within the City Development Plan.</p> <p>The Regional Homeless Forum, which is comprised of key stakeholders, to develop a new Regional Homeless Action Plan aligned to Pathway 2 of Housing for All (Pathway to Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion) to commence in 2023. If and as appropriate, a specific Action Plan for the City to be developed out of the Regional Plan.</p> <p>Galway City Council to be adequately resourced with key personnel to deliver on the actions relating to the delivery of new private, affordable and social housing over the period of the plan. Set out a programme for eliminating homelessness.</p> <p>Support/implement strategies launched under Housing for All including:</p> <p>Second Housing First Implementation Plan which supports rough sleepers and others who experience entrenched homelessness (published Dec 2021).</p> <p>Housing Led tenancies part of the Housing First programme</p> <p>CDP must commit to implementing prevention measures outlined in the forthcoming Homelessness Prevention Strategy in full, to minimise to the greatest extent possible new entries into homelessness.</p>	<p>CE Response</p> <p>Issues with regard to Homelessness are noted. The existing policy and text in the plan recognizes the commitment of government to the eradication of homelessness by 2030 and the Council will implement any new initiatives arising from Housing for All in conjunction with relevant stakeholders.</p> <p>Policy 3.1 includes to work with the voluntary, community and public sector in addressing the housing needs of homeless people with the endeavour to eliminate homelessness and having regard to the measures in the West Region Homelessness Action Plan 2020 – 2022 and relevant national policy including those set out in Housing for All - a New Housing Plan for Ireland.</p> <p>These submissions have been referred to our Housing Section for their consideration as many of the issues raised refer to the service delivery plan and operational programme of the Housing Section.</p>

<p>Support/implement the new National Youth Homelessness Strategy due to be published in Q3 2022. And ensure youth homelessness is addressed.</p> <p>Recognise the additional needs/supports required to meet the housing needs of people who have suffered significant trauma/mental health difficulties and/or addiction issues as per Housing For All.</p> <p>Policy 3.1.22 - 2 year review of the housing strategy should be carried out by a panel with relevant expertise, utilising key data and compared with baseline data.</p> <p>Increase number of social and affordable housing options.</p> <p>Increase funding for Tenancy Sustainment and Resettlement Services.</p> <p>Recognise critical nature of Inter-Agency Cooperation in addressing Homelessness.</p> <p>Work with relevant agencies to identify young people at risk of Homelessness.</p> <p>Establish an Older Persons Homeless Action Team.</p> <p>Support for Rough Sleepers and Individuals with Complex Needs</p> <p>Increase the number of single occupancy, ensuite rooms for emergency accomodation.</p> <p>Housing First - Increase number of one-bedroom units. Two-bedroom accommodation must also be considered for single people who have overnight access to their children. Introduce a Housing First for Youth Program.</p> <p>Emergency accommodation must be designed to ensure easy conversion into permanent housing, reflecting a commitment that homelessness can be ended.</p>	
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	<p>Increase the number of community-based housing options for single people experiencing homelessness, who have little or no support requirements.</p> <p>Reduce reliance on Family Hubs and Tourist accommodation. Introduce a Housing First for families pilot.</p> <p>Ensure every person who enters emergency accommodation is provided with a support plan focused on a speedy transition out of homelessness.</p> <p>Provide funding for suitable age-appropriate localised responses to homelessness for older people currently reliant on homeless hostels and B&B placements.</p>	
GLWC-C2-196 COPE Galway	<p>Domestic Violence</p> <p>Where a local authority tenancy exists, and an order from the court has been granted, the local authority should consider the potential of deeming this an antisocial behaviour and consider whether the abuser forfeits the right to the tenancy. In effect, this means the abuser must leave the home, as opposed to the current situation whereby the victim and children (also victims) are at risk of homelessness.</p> <p>Where a joint housing application is in play, that the process of separating applications is streamlined and easy to access so that a woman and her children may move on alone.</p>	<p>CE Response</p> <p>This matter while very important, is outside the scope of the development plan. These are matters which have been referred to our housing section for their consideration as part of their operational programmes. The draft plan gives general policy support in Policy 3.1 Housing Strategy which includes to support service providers in the provision of domestic violence refuges in the city.</p>
GLWC-C2-118 Ibec	<p>Housing Need- HNDA</p> <p>The Council must provide social and affordable housing specifically to meet the forecast housing needs of new additional households over the housing strategy period to 2029 as identified by the Galway City Housing Strategy and Housing Need & Demand Assessment 2023-2029.</p> <p>There is an oversimplification of the homebuilding and development process in the HNDA process. Housing need figures</p>	<p>CE Response</p> <p>It is noted that the HNDA is a tool that was developed at national level and developments are required under section 28 ministerial guidelines to comply with the assessment methodology to establish housing targets. Nationally, Housing for All is the framework for the national strategy for housing and platform for dealing with any radical change in delivery.</p>

	should be amended to account for the conflict in Ukraine and the increase in construction materials	
GLWC-C2-118 Ibec	<p>Housing Mix and Tenure</p> <p>Galway's housing strategy must account for the required change in household mix and tenure. We need the right mix of housing in the right areas, in accordance with suitable and sustainable development practices. It is important that the City's housing policy adequately accounts for the expected demographic changes that will impact the housing stock and mix required over the coming years.</p> <p>A holistic view of housing is required, allowing for an appropriate mix of location, type, tenure and accommodation. Students, young professionals, families, and an older population all have different housing needs. There is a strong demand for rental accommodation to reflect those living and working in the city.</p> <p>Increasing the availability of zoned and serviceable land will be essential to meeting Ireland's housing needs.</p>	<p>CE Response</p> <p>Noted, the policies of the draft plan gives support to this issue in policy 3.1 Housing Strategy and in policies relating to sustainable neighbourhoods.</p> <p>The Core Strategy includes for the scale of zoned lands to meet population and housing targets within the plan period as identified by the section 28 guidelines - Housing Supply Target Methodology for Development Planning Guidelines for Planning Authorities (Dec. 2021). The draft plan includes policy support for a mix and range of house types.</p>
GLWC-C2-118 Ibec	<p>Social and Affordable Housing Supply</p> <p>Galway City Council should use the Development Plan 2023-29 to leverage innovative and diversified funding streams to support the provision of affordable housing within the city. This includes strategic pursuit of competitive funding under Project Ireland 2040 such as the Urban Regeneration and Development Fund (URDF) and the new funding streams announced such as Croí Cónaithe (Cities) Fund and Project Tosaigh. Additionally, it should work with Central Government to access European funding.</p>	<p>CE Response</p> <p>This is noted and is supported in draft plan policy.</p>
GLWC-C2-72 Land Development Agency	<p>Amendments to Policy 3.1- Housing Strategy</p> <p>The LDA welcomes the approach to housing provision and requests that amendments be made to policy 3.1 to reflect the role</p>	<p>CE Response</p> <p>This is noted and it is considered that an addition to Policy 3.1 Housing Strategy with regard to collaboration with the Land Development Agency</p>

	<p>of the LDA and to prioritise public owned lands for housing delivery for social and affordable housing.</p>	<p>can be amended to include that the delivery of social and affordable housing on public lands will be a priority.</p> <p>CE Recommendation</p> <p>Amend Policy 3.1 Housing Strategy to insert additional text in No. 5 - text outlined in green as follows:</p> <p>5. Work in collaboration with the Land Development Agency to enhance delivery of the long term strategic needs for social, affordable and cost rental housing in the city. The delivery of social and affordable housing on public lands is a nationally recognised priority.</p>
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3.3 - Traveller Accommodation		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-148 Galway City Community Network	<p>Policy 3.2 Traveller Accommodation: GCCN requests that in relation to Policy 3.2 Traveller Accommodation: The Council will implement <u>fully</u> the Traveller Accommodation Plan (p.68). Objectives for Traveller accommodation are integrated into all Local Area Plans and Strategic Development Zones Planning Schemes (p.68)</p>	<p>CE Response</p> <p>The wording of policy 3.2 is considered acceptable. The Development Plan makes specific provision for Traveller specific accommodation in a range of land use zones which will apply to land use zones within Local Area Plans.</p> <p>The draft plan does not include Strategic Development Zones Planning Schemes.</p>

3.4 - Sustainable Neighbourhood Concept		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-148 Galway City	Policy 3.3 Sustainable Neighbourhood Context	CE Response

Community Network GLWC-C2-228	<p>GCCN requests that in relation to Policy 3.3 Sustainable Neighbourhood Context:</p> <p>The Council will ensure that facilities and services are part of the planning process and that no housing developments should be permitted without ensuring access to these facilities and services immediately on completion of the developments (p.75)</p> <p>Develop housing around key transport hubs (i.e. Ceann Station, the Inner Harbour lands and the Harbour lands).</p> <p>The spatial imbalance between mono zoned residential areas and key employment areas (I.e Parkmore) needs to be addressed by providing housing in close proximity to employment centres (or vice versa), providing safe active travel infrastructure, and regular / easily accessible public transport.</p>	<p>These issues are supported in the policy framework of the draft plan. A key element of the plan is to support compact growth and alignment of land use and transportation, reducing travel distances and car dependency. The settlement and Core Strategy of the plan supports the concept of the 15 minute city and this is reflected also in the sustainable neighbourhoods set out in Chapter 3. The designation of regeneration and opportunity sites supports mixed use residential developments with major sites located within the city centre and allied to proposed investment in public transport and active travel networks including key transport hubs. It is also noted that the Ardaun LAP area is a significant housing area planned in close proximity to Parkmore and Merlin Hospital employment hubs.</p>
GLWC-C2-188 Siobhan Fitzgerald	<p>Ballybane Neighbourhood</p> <p>Improve Ballybane neighborhood particularly newer estates such as Ard Alainn, remove gates that prevent mobility and increase community group presence, the litter in the area devalues the area and moral. The green areas could be maintained better to ensure a sustainable neighbourhood.</p> <p>Please improve housing stock across the city and suburbs.</p>	<p>CE Response</p> <p>Noted, sustainable neighborhood policies support accessibility and provision of community facilities. Issues of litter management and maintenance are matters to be addressed in service delivery plans and work programmes of the Environment and Recreation and Amenity Sections.</p>
GLWC-C2-173 Galway Cycling Campaign	<p>Policy 3.3 Sustainable Neighbourhood Concept Amendment</p> <p>A new specific policy item is suggested to be included in this section of the plan to state:</p> <p>"Efforts should be made in collaboration with neighbourhood groups to connect green areas between adjacent estates by suitably designed paths to allow easy connectivity for people walking, using wheelchairs or cycling. Explore the possibility of connecting roadways which meet each other in adjacent estates separated by a wall, using a modal filter. This will allow easy and secure passage of</p>	<p>CE Response</p> <p>These suggested amendments are noted. The policy and text throughout the draft plan is considered appropriate in relation to achieving permeability and greater accessibility. In the consideration of planning applications for new developments, connectivity to adjoining areas are an important consideration. In relation to retrofitting into existing estates it is considered that this should be done on a case by case basis under the permeability programme in the Transport Section/NTA.</p>

	<p>people walking, using wheelchairs, and cycling with a view to increasing permeability and providing alternatives to arterial routes for people. All new and retrofitted permeability links should be spacious, attractive, lit and overlooked in line with best practice guidelines to enable passive surveillance and accessibility".</p> <p>Rationale</p> <p>Specific and clear measures could be proposed to deliver improved permeability in existing developments. While citing the "Permeability a Best Practice Guide" from the National Transport Authority is helpful, no areas or contexts have been identified in the plan where permeability will be retro-fitted. This NTA document provides helpful guidance on how to design for increased permeability, but the guidance cannot itself identify specific locations for permeability interventions in the local context. Specific, potential permeability interventions across Galway City should thus be identified in this plan. This could include the proposed amendment above, giving a context where permeability improvements will be made, or could involve specific areas.</p>	<p>Under Section 3.4 Streets and Movement, it states that Design principles and measures should consider connectivity and permeability providing convenient access to places, particularly to schools and places of work. It states that routes <i>within the area should be accessible for everyone including the needs of all users, including the elderly and people with a disability, and should be as direct as possible.</i></p> <p>It also includes to <i>Provide for safe access on streets, paths and cycle routes for users of all ages and degrees of personal mobility.</i></p> <p>Chapter 4 also includes for active travel and permeability.</p>
GLWC-C2-173 Galway Cycling Campaign	<p>Amend text - 3.4 Sustainable Neighbourhood Concept</p> <p>Proposal: Amend text in 3 Housing and Sustainable Neighbourhoods - 3.4 Sustainable Neighbourhood Concept to reflect the need for safe and sustainable residential streets to be free from through-traffic.</p> <p>Suggested amendment under Streets and Movement, p73 (amend text and add new point to list):</p> <p>From: "Streets and Movement- The layout of residential development needs to create spaces where the car becomes secondary and where the street has an important public realm function beyond the movement of traffic. Design principles and measures should consider the following:"</p> <p>To: "Streets and Movement- The layout of residential development needs to create spaces where the car becomes secondary and</p>	<p>CE Response</p> <p>The text of the draft plan which sets out various design requirements to reduce traffic is considered an appropriate address. Strategic road closures are a matter for consideration on a case by case basis.</p> <p>The addition of text in relation to exclusion of certain traffic as suggested is not recommended nor appropriate for the draft city development plan. While design can seek to reduce the need for through traffic, it would not be possible to ensure that only traffic with business in the area would use particular roads and streets and is not a planning policy matter.</p>

<p>where the street has an important public realm function beyond the movement of traffic. There should be a presumption that the only motor traffic present has some business in the area.</p> <p>Design principles and measures should consider the following</p> <p><u>Local traffic: Measures to actively exclude through-traffic such as strategic road closures.</u></p> <p>Suggested amendment under Homezones, p74: Add: “Homezones</p> <p><u>The elimination of through-traffic having no business in that place is a key component of the Homezone concept.”</u></p> <p>Rationale</p> <p>The removal of through-traffic is an element of the top measure under the Hierarchy of Solutions in the National Cycle Policy Framework: (1) Traffic Reduction</p> <p>In relation to the Galway Transport Strategy, the removal of through-traffic only appears to be discussed in relation to the city centre. There is no apparent discussion of the need to exclude through-traffic from local roads around the city, in particular residential streets. The issue of removing through-traffic as a general policy does not seem to be discussed at all under "GTS Appendix F Cycle Network and Infrastructure Development".</p> <p>Further to this, Chapter 3 of Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, Department of Housing, Local Government and Heritage (2009) “The role of design” for urban, residential streets gives the following direction on the need to manage through motor traffic:</p> <p>Design process</p> <p>3.15 The design of street layouts must start by considering people movement rather than vehicle movement. This approach ensures greater consideration of pedestrians, cyclists and public transport</p>	
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	<p>users. In many instances, all users can comfortably share the same street network. When designing a street layout for a new residential area, designers should assess the need for, and specific roles of: (g) Residential streets with limited through motor traffic.</p>	
GLWC-C2-227 Brendan Mulligan	<p>Higher Densities & Building Height 6 Storeys or Less</p> <p>Residential Densities</p> <p>If we are to have a compact walkable city we need density. We don't need excessive height to achieve density. Submission includes two examples of award winning, high-density developments of 82 dwellings per hectare in Norwich, UK and 410 dwellings per hectare in Camden Courtyards, London at heights of 2/3 and 5/7 storeys respectively. The densities in the adopted Ardaun LAP are very much lower with medium net density of 30-35 units per hectare and high net density of 35-50 units per hectare.</p> <p>Recommendation: Keep residential building height at 6 storeys or less.</p>	<p>CE Response</p> <p>This submission is noted. Placing a cap on building height in the city would be contrary to section 28 ministerial guidelines in relation to building height.</p> <p>It is considered that there may be appropriate locations within the city that can accommodate height in excess of 6 storey height. These will be assessed on a case by case basis for suitability in accordance with relevant policies and guidance in the Development Plan and the Urban Density and Building Height Study.</p>
GLWC-C2-228 Galway Environmental Network	<p>15 Minute City</p> <p>Include policies and objectives consistent with delivering a "15-minute city" following best international practice, this includes ensuring that recreation amenities, shops, schools, employment, and other community services are located within communities.</p> <p>Carry out a 'needs assessment' in existing neighbourhoods to determine what services and amenities, schools, shops, employment opportunities, playgrounds, playing fields, cultural facilities, community facilities are available within 15 min walk/cycle. Aim to provide services/amenities within 15 min walk/cycle of existing neighbourhoods to reduce the need to travel.</p> <p>Assess the level of permeability in existing neighbourhoods to facilitate greater access to services/amenities by active and public transport.</p>	<p>CE Response</p> <p>This submission is noted. The draft plan specifically supports the concept of a 15 minute city and policies and objectives in relation to sustainable neighbourhoods, transportation, retail strategy, green network and community provide a framework to support the concept.</p> <p>A specific objective of the draft plan is to carry out an audit of community facilities. The purpose of the audit will be to identify current gaps, demand, and capacity and identify areas where broader use can be made of community resources including opportunities for multi-purpose use.</p> <p>In relation to permeability, this is a principle that is supported throughout the plan and more specifically in Chapter 4.</p>

GLWC-C2-83 Noel Porter	<p>Neighbourhood Connectivity for Pedestrians and Cyclists</p> <p>In general, we should try to better connect all the neighborhoods in the city with access ways that accommodate both walker and cyclist. It seems to have been a standard policy to date to provide access points that allow only the able-bodied pedestrian to pass through. The disabled, the very old and people on wheeled transport are discriminated against or at the very least impeded with barriers and gates. Although originally implemented to prevent possible intermittent anti-social behavior, they permanently prevent/impede regular people from living an active lifestyle.</p>	<p>CE Response</p> <p>This submission is noted and universal access is a key aspect of the draft plan in particular in terms of Chapter 3 in sustainable neighbourhoods, Chapter 4 transportation, Chapter 5 recreation and amenity and Chapter 7 community and culture and in Chapter 8 Urban Design and Placemaking and Chapter 11 development standards.</p> <p>The matter of improved access is currently under review by the Recreation and Amenity Section as a part of their operational work programme. They are in the process of working on a combined review with the NTA team in the Transport Section and Housing and Social Inclusion to come up with an appropriate alternative design to existing barriers such as kissing gates in order to maximise permeability.</p>
GLWC-C2-123 Owen Hanley	<p>Renmore-Active Travel, Infrastructure and Amenities</p> <p>With the proper investment over the coming decade Renmore can be the embodiment of the goal of a sustainable neighbourhoods outlined in the draft City Development Plan. There is a need to increase general purpose community space in the area as well as put in place infrastructure to increase rates of active travel and public transport use.</p> <p>Ballyloughane should be at the heart of an eastside coastal amenity to the same quality of the Salthill Promenade.</p>	<p>CE Response</p> <p>Noted, the development plan includes a policy framework to support investment in the city including at Renmore. There are a range of policies and objectives in the draft plan to support community space and emerging sustainable mobility projects.</p> <p>With regard to Ballyloughane, this area has different characteristics and qualities in comparison to the promenade and it may not be appropriate to promote replication of the Salthill promenade. The future development of the Murrough LAP area will enable significant amenity opportunities as an eastside coastal amenity.</p>
GLWC-C2-118 Ibec	<p>Housing Supply and link to Economic Competitiveness</p> <p>The biggest single domestic driver of competitiveness pressures is the lack of housing supply. There is a clear link between housing availability, affordability, and our economic competitiveness. Continued shortage of affordable housing threatens to undermine the achievement of many economic policy goals, including the attraction of overseas investment into Ireland, the promotion of third-</p>	<p>CE Response</p> <p>Noted, the plan sets out a strategy for integration of land use and an evidence based Core Strategy to accommodate and direct policy objective to support the delivery of housing in the city for the period of the plan.</p>

	level education, the reduction of emissions and the improvement of household incomes and wellbeing.	
GLWC-C2-118 Ibec	<p>Creating Sustainable Neighbourhoods- 15 minute concept- Build Communities not just Housing</p> <p>Achieving greater diversity of land use within urban areas will aid sustainable rejuvenation. This requires a better and more appropriate balance between residential, retail, and other commercial or business activity.</p> <p>The 15-minute city concept is not new. It has been at the centre of good placemaking for decades. Urban planning necessitates building communities, not just housing. This impacts a city's ability to attract or retain people.</p>	<p>CE Response</p> <p>Noted, the draft plan supports sustainable neighbourhoods and the 15 minute city concept.</p>

3.5 - Sustainable Neighbourhoods: Outer Suburbs

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-153 People Before Profit Galway	Proposed text to amendments for Universal Design & Street Design	<p>CE Response</p> <p>These comments are noted and a text amendment is recommended.</p>
GLWC-C2-180 Access for All	<p>PAGE 75 (Page 73 in actual plan), under Streets and Movement: Connectivity and Permeability: Provide universal convenient access to places, particularly to schools and places of work. Routes within the area should be accessible for everyone including the needs of all users.</p> <p>PAGE 76 (Page 74 in actual plan), under Universal Design: The application of universal design principles and lifetime adaptability in the design and layout of new development is more inclusive and future proofs housing for changes in individual lifecycles. This approach assumes that every person experiences barriers, reduced functioning, or some form of disability, either temporary or permanent, at some stage in life. It seeks to make public</p>	<p>With regard to reference to the UNCRPD, appropriate text is included in Chapter 7, section 7.3 Inclusive city and Chapter 4 section 4.6 Road and Street Network- accessibility, in relation to vulnerable road users. An amendment is also proposed to include the UNCRPD in the strategic policy framework in Chapter 1 (see CE Report Chapter 1 recommendations).</p> <p>CE recommendation</p> <p>Amend Section 3.4 Sustainable Neighbourhood Concept Streets and Movement – insert text outlined in green as follows:</p>

	<p>places and the built environment accessible, understood and used comfortably and with minimum effort and to the greatest extent possible by all people, regardless of their age, size, ability or disability. Best practice guidance including Buildings for Everyone (2012) by the NDA provides guidance on the design of accessible spaces. Further, the promotion of universal design is a general obligation under Article 4 (part f) of the UNCRPD.</p>	<p>Design principles and measures should consider the following:</p> <ul style="list-style-type: none"> • Connectivity and Permeability: Provide universal convenient access to places, particularly to schools and places of work. Routes within the area should be accessible for everyone including the needs of all users, including the elderly and people with a disability, and should be as direct as possible.
GLWC-C2-123 Owen Hanley	<p>Ballybane</p> <p>The City Development Plan must proactively support community efforts in the Ballybane area led by the Ballybane Taskforce and other community groups to enrich the social and economic fabric of the area. The policy objective for a regeneration plan for Ballybane's open spaces (3.5.5) should be prioritised to deliver enhancements to the public realm, green spaces, and recreation facilities of the area in consultation with the community.</p>	<p>CE Response</p> <p>The draft plan sets out a policy framework to support sustainable neighbourhoods including areas like Ballybane.</p> <p>Chapter 7 section 7.7 also includes support for the delivery of facilities in Ballybane.</p>
GLWC-C2-141 National Transport Agency	<p>Sustainable Neighbourhoods - NTA</p> <p>Policy 3.4 Sustainable Neighbourhoods: Outer Suburbs and Policy 3.5 Sustainable Neighbourhoods: Established Suburbs does not mention access to public transport as a key component of creating a sustainable neighbourhood.</p>	<p>CE Response</p> <p>The guiding policy for the sustainable neighbourhood concept is Policy 3.3 which includes to ...<i>Promote the development of compact, well designed, safe and attractive neighbourhoods that deliver efficient use of land and have effective integration with social and physical infrastructure, including public transport that will enable the development of successful communities....</i> This recognises that public transport is a key component of creating a sustainable neighbourhood.</p>
3.6 - Sustainable Neighbourhoods: Established Suburbs		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-72 Land Development Agency	<p>Amend Policy 3.6 Sustainable Neighbourhoods: Inner Residential</p>	<p>CE Response</p> <p>There is considerable support for Regeneration and opportunity sites in both Chapter 3 and Chapter 10 of the plan. It is considered</p>

	<p>Inner Residential Areas be amended to include policy to support and prioritise Regeneration and Opportunity Sites to contribute to the regeneration and optimisation of underutilised lands within this zone.</p>	<p>that a similar policy to Policy 3.7 City Centre Residential Areas which is to prioritise the provision of new homes on designated Regeneration and Opportunity Sites in the city centre at appropriate scales to enable the development of new sustainable city centre communities is appropriate for inclusion in Policy 3.6 Inner Residential Areas. See also CE response to OPR in relation to optimisation of underutilised lands.</p> <p>CE Recommendation</p> <p>Amend Policy 3.6 Sustainable Neighbourhoods: Inner Residential Areas, to insert no. 3 - outlined in green as follows:</p> <p>3. Prioritise the provision of new homes on designated Regeneration and Opportunity Sites in the Inner Residential Areas at appropriate scales to enable the development of new sustainable communities.</p>
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3.7 - Residential Neighbourhood Regeneration Areas		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-150 Angela Casey	<p>Munster Ave and Father Griffin Road- Prone to Flooding- Worthy of Protection from Flooding</p> <p>Munster Avenue and Fr Griffin Road are subject to flooding. This flooding can occur during periods of high rainfall levels coinciding with high tides, but can also occur from high tides only. Part of the flooding problem is caused by the existing surface-water runoff being unable to discharge into Galway Bay when heavy rainfall and high tides coincide. Instead of discharging to the Bay, Munster Avenue, Fr Burke Park and Fr Griffin Road act as a sump, holding the water until the tide recedes and discharge to the Bay is possible.</p>	<p>CE Response</p> <p>With regard to areas at risk of flooding or areas that have been subject to flooding, these will be addressed under the Coirib go Costa Galway City Flood Relief Scheme that is currently being advanced. Policy 9.1 gives support to this project to address flooding. Public consultation is part of the development of the scheme and a dedicated website is set up www.coiribgocosta.ie which gives details on how to get involved.</p> <p>It is recommended that the text in section 3.7 be amended to reflect that it is not just the Claddagh area that is impacted by flooding but also surrounding areas.</p>

	<p>In the draft Plan, at section 3.7, the Claddagh is mentioned as an inner residential area that the Galway Flood Relief Scheme will benefit. The Claddagh does not flood at the frequency or intensity as Munster Avenue and Fr Griffin Road.</p> <p>The strategic project reference to the Cósta Galway City Flood Relief Scheme at page 82 of section 3.7 should be expanded to include Munster Avenue, Fr Burke Park and Fr Griffin Road to ensure these areas are also resilient to impacts from climate change.</p> <p>Policy 3.6 should include specific mention of the city centre and inner city residential areas of Munster Avenue and Fr Griffin Road, although my preference is that these 2 residential areas be identified in their entirety as city centre residential areas.</p>	<p>It is considered that the neighborhood map defines the inner residential area and that streets should not have to be mentioned in policy 3.6 which is to protect the quality of all the inner residential areas.</p> <p>CE Recommendation:</p> <p>Amend Section 3.7 Sustainable Neighbourhoods: Inner Residential Areas last paragraph to insert text outlined in green as follows:</p> <p>...Other strategic projects such as the Corrib go Cósta Galway Flood Relief Scheme will ensure neighbourhoods, in particular the Claddagh and surrounding areas, are resilient to the impacts of climate change.</p>
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3.8 - Sustainable Neighbourhoods: Inner Residential Areas

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-150 Angela Casey	Munster Ave-Zone change from LDR to R will destroy Unique Amenity Value	CE Response In relation to Munster Avenue, the majority of this street is zoned for residential use and a smaller section towards the William Street West Road junction is zoned for CC use. This zoning has not changed from the current plan 2017-2023 and has not changed in the previous two development plans dating back to 2005.
GLWC-C2-158 Thomas Lee	Submission requests that Munster Avenue is given special recognition as an inner city residential area, and afforded protection from intensive development.	In terms of residential neighbourhoods, Munster Avenue straddles the inner residential area and the city centre as set out in Figure 3.1 Galway city neighbourhoods. The boundaries of these neighbourhoods have not changed from the current plan.
GLWC-C2-184 Valerie Walsh		
GLWC-C2-234 Anne & Pat O'Toole	The Avenue has 2 intact terraces of houses, numbers 1-6 and 7-12, dating from around the 1940's that warrant specific mention and protection. These terraces, of 12 houses in total, are former, and current, "corporation houses", and all are inhabited by owner/occupiers or tenants of the City Council. The remainder of the Avenue is a mix of privately owned houses, small scale apartment developments, and some vacant property to the North	The submissions received express concern with regard to potential for high density development to impact on the residential community of

	<p>and city end (eastern) of the Avenue. At the city end (eastern) of the Avenue there is some small scale commercial development and some high-density apartment developments which were built under a tax-incentivised scheme.</p> <p>Munster Avenue is located in the City Centre, with the North-Eastern and Eastern portion having CC Zoning, and the remainder having Residential Zoning. The inner city residential areas are now changing from the Low Density Residential zoning that applied in the 2017-2023 Plan to a high-density R zoning in the draft Plan. This change in zoning undermines the legislative requirement that Development Plans set out an overall strategy for the proper planning and sustainable development of the area. How can the draft Plan be considered to provide for the proper planning and sustainable development where the city centre area will now have an R zoning instead of the LDR zoning it previously held. Such a zoning will lead to overdevelopment of the city centre and destroy the unique amenity value it currently affords.</p>	<p>Munster Avenue. It is considered that the policies of the plan set out in Chapter 3 in relation to protection of the character and amenities of these areas is sufficient to address the concerns of the community. Similar policy has been applied successfully in historic planning applications to protect against inappropriate scale in this area.</p> <p>In relation to the Inner residential areas, section 3.7 of the draft plan states that Infill development should not be of such a scale that represents a major addition to, or redevelopment of, the existing urban fabric. It also states that infill development will have regard to the existing pattern of development, plots, blocks, streets and spaces. Infill development will also have regard to the scale and proportion of existing buildings, building lines, massing and height of buildings in relation to the street</p> <p>The protection of existing residential amenity and character is a priority but must be balanced with opportunities for sustainable high quality regeneration and appropriately scaled infill.</p> <p>Policy 3.6 Sustainable Neighbourhoods: Inner Residential Areas, includes to protect the quality of inner residential areas by ensuring that new development through consolidation, infill and redevelopment does not adversely affect their character and has regard to the prevailing pattern, form and density of these areas.</p> <p>These are considered reasonable policies to support compact growth and to ensure that the character and amenity of these areas is not unduly impacted upon. Any development opportunities within these areas will be assessed in accordance with these policies and against a range of other policies and standards in relation to urban design, public realm, open space, traffic safety and parking provisions.</p>
GLWC-C2-150 Angela Casey GLWC-C2-158 Thomas Lee	Munster Ave - Section 3.8 comments <p>In section 3.8, paragraph 1, any developments of Fr Burke Park under the heading public realm must respect the residential</p>	CE Response <p>A key aspect of the sustainable neighbourhood concept is the protection of existing residential amenity and character. Any development proposals in this area will be assessed and the residential amenity of surrounding</p>

GLWC-C2-184 Valerie Walsh	<p>amenity of the terraces of houses that adjoin the northern boundary of the Park.</p> <p>In section 3.8, paragraph 3, the city-centre community of Munster Avenue should be identified as contributing to the vitality and liveability of the city core.</p> <p>Traffic plans, including the proposed Purple Flag road closures advertised in March 2022, which will divert traffic onto Munster Avenue, should be prohibited in city centre neighbourhoods if the draft Plan has genuine aspirations to protect these communities.</p> <p>In section 3.8 entitled Sustainable Neighbourhoods; City Centre Residential Areas there is a further heading Low Density Residential Areas. There are no low density residential areas zoned in the Galway City Draft Development Plan 2023-2029 Map B City Centre Map. What relevance has this section to the City Centre residential areas? The existing residential zoning for the City Centre Ares is LDR in the 2017-2023 Development Plan; this should be retained in the new Development Plan.</p> <p>The reference to amenity improvements in the green network at page 83 of section 3.8 could also benefit Munster Avenue if the neighbourhood is identified as a city centre residential area. Fr Burke Park is a city centre park which borders Munster Avenue. Appropriate improvements could enhance the city centre residential communities of Munster Avenue and Fr Griffin Road.</p>	<p>properties will be considered in accordance with development plan policy and development management standards.</p> <p>It is noted that Munster Avenue is largely defined as an inner residential area as opposed to being within the city centre core.</p> <p>The protection of existing residential amenity is a priority in the plan. It is recognised that there are challenges within city centres to cater for the mix of uses and activities and a balanced approach is required. Comments with regard to road closures and the impact of traffic diversions are noted. It is not considered appropriate to include in the draft plan to prohibit road closures as proposed. The policy of the plan is to reduce traffic within the city centre through implementation of the GTS and public realm strategy. This would improve the overall amenity and environment of the city centre. It is noted that conflicts between uses which arise are often addressed through enforcement and management. These are issues that are outside of the scope of the development plan and are part of the wider local authority operational service delivery plans and operational programmes. A change to the draft plan is not recommended.</p> <p>With regard to lands zoned for low density residential, these are not located within the city centre.</p> <p>Amenity improvements to Fr. Burke Park will come under the service delivery programmes of the Recreation and Amenity section. The location of the park within the neighbourhood classification is not a determinant of whether or not improvements will be carried out. The Greenspace Strategy will afford an opportunity for consultation specifically with regard to open spaces.</p>
GLWC-C2-72 Land Development Agency	<p>Sandy Road to be located in Inner Residential Area</p> <p>Request that the sustainable neighbourhood areas be changed so that the Sandy Road site is located within the Inner Residential Area rather than the Established Suburbs as this would allow the site's regeneration to avail of greater flexibility in</p>	<p>CE Response</p> <p>This is not considered necessary. The determination of the densities and heights at this location will be based on a range of criteria such as surrounding context, visual amenity, proximity to public transport networks. The requirement to prepare a masterplan will determine in a holistic and integrated manner the optimum regeneration proposals for</p>

	terms of development standards, ultimately allowing for greater densities and increased heights.	these land. (See also amendments recommended in the OPR recommendation 6)
GLWC-C2-170 Nuns' Island Residents' Association	Density in Nun's Island Area The residential density of the Nuns' Island area has been relatively low, thus allowing for the development of good community spirit. Any increase in density would be detrimental to this essential aspect. In particular, development of hotel type accommodation is seen as unsuitable. The new development plan should state what is actually meant by low density. Under policy 3.8 when low density is mentioned, it seems to have different meanings. The actual allowable density in low density historical neighbourhoods should be stated.	CE Response With regard to lands zoned for low density residential, these are not located within the city centre. Residential densities within the city centre vary and what is achievable can depend on a range of factors such as site context, existing densities and height, impact on adjoining properties, historical context etc. Densities are also driven by NPF policy to deliver sustainable compact growth.

3.9 - Sustainable Neighbourhoods: City Centre Residential Areas

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-191 Bowling Green Residents' Association	Bowling Green - Protection of Residential Amenity Bowling Green is a residential community of over 70 households in the historic core of the city. Some residents have lived here all their life, others for 30, 50 years. A number of young adults have grown up in this street. We welcome policies that strengthen protection of residential amenity and improvement of the public realm. We welcome the idea of a Living City. A living city makes provision for its citizens of all ages to enjoy the city, with priority given to pedestrians. The draft plan makes a number of references to Bowling Green. However please add Bowling Green into Table 3.1 alongside Wood Quay, Long Walk etc. There are many references to residential development. For city centre communities, it is very important to distinguish the different elements of residential. The most important for	CE Response The draft plan includes in policy 3.1 to support a diverse range of housing types, size and tenures and endeavour to meet the demand for Owner Occupier housing as projected in the Housing Strategy and the Housing Need and Demand Assessment (HNDA). It also includes in policy 3.1 to ensure the provisions of the Residential Tenancies (Amendment) Act 2019 and the Planning and Development Act 2000 (Exempted Development) (No. 2) Regulations 2019 and any other future legislation and guidelines are applied where planning permission is required to control short-term letting accommodation to prevent a negative impact on housing supply and /or an over-concentration of such uses. Notwithstanding this, where planning consent is required under legislation for short term letting, there will be a presumption against allowing such a use in view of the status of the city defined as a rent pressure zone.

	<p>communities is owner-occupied or long-term letting. Short-term rental, hostels or hotels do not contribute to building up and strengthening a community. Please distinguish between long-term living and short-term stays in your policies. Hotels and hostels are 'commercial' and cannot be considered 'residential'.</p>	<p>Within the city centre it is considered acceptable to allow for a wider range of uses including hotels and hostels and student accommodation</p> <p>It is recommended that table 3.1 indicative neighborhood areas in Galway include Bowling Green as a city centre residential area</p> <p>CE Recommendation</p> <p>Amend in Chapter 3, Table 3.1 Indicative Neighbourhood Areas in Galway, to include Bowling Green as a city centre residential area</p>
GLWC-C2-72 Land Development Agency	<p>Amendment to policy 3.7 City Centre Residential</p> <p>Suggests an amendment to policy 3.7 City Centre Residential area to include explicit reference to publically owned lands in cooperation with the LDA in the context of delivery of housing.</p>	<p>CE Response</p> <p>It is not considered appropriate to amend policy 3.7 in this regard. Policy 3.7 is much broader policy context than just public lands. The LDA are not the only stakeholders or agency involved in regeneration within the city center.</p> <p>Policy 3.1 Housing Strategy includes to work in collaboration with the Land Development Agency to enhance delivery of the long term strategic needs for social, affordable and cost rental housing in the city and an amendment is already proposed to add that the delivery of social and affordable housing on public lands is a nationally recognised priority.</p>

3.10 - Specific Objectives		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-123 Owen Hanley	<p>Doughiska- promote 15 minute concept</p> <p>Community in Doughiska would benefit from increased investment in public realm, community spaces and retail areas to promote a 15 minute concept in the area.</p> <p>The skateboarding facilities in the area should be replaced with a concrete bowl developed in consultation with users.</p>	<p>CE Response</p> <p>Noted, the development plan includes a policy framework to support investment in the city including at Doughiska. There are a range of policies and objectives in the draft plan including zoned areas to support open space, public realm, shops and services in Doughiska.</p> <p>Previous discussions with the statutory undertaker with regard to undergrounding these lines raised issues of unreasonable cost and</p>

	<p>The draft City Development Plan should incorporate a policy (9.10) of ensuring future national energy grid infrastructure to be underground and also that existing above ground infrastructure should be placed underground such as at An Sean Bhaile, given the impact it has on a community.</p> <p>The Ballybrit area should also be given more consideration, the Council should include a policy to investigate the potential to develop recreation and amenity open space.</p> <p>The provision of a footpath on Ballybane More Road should also be included as a short term objective.</p>	<p>challenges with regard to operations and maintenance. The statutory undertaker states that it was not considered feasible to underground. The Green Space Strategy will consider the needs of different areas of the city for open space.</p> <p>There are RA zoned and G zoned lands in this area and it is also proximate to Merlin park woods and the racecourse.</p> <p>The draft plan mapping includes a specific objective for road improvements along the Old Ballybrit Road.</p>
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Chapter 3 Housing and Sustainable Neighbourhoods: CE Recommendations

1. Amend Section 11, Part B Development Standards and Guidelines to include text in green as follows:

Statement of Housing Mix

All planning applications involving developments of 25 or more shall be required to include a Statement of Housing Mix detailing the proposed mix and demonstrating that it provides a sufficient range in unit sizes and types to satisfy community mix including the demographic trend of reduction in average household sizes.

The Statement of Housing Mix shall outline how the scheme has been designed for the needs of older people and/or persons with a disability and/or lifetime homes.

Plans shall clearly identify proposed units that are designed as universal homes.

2. Amend Policy 3.1 Housing Strategy to insert additional text in No. 5 - text outlined in green as follows:

5. Work in collaboration with the Land Development Agency to enhance delivery of the long term strategic needs for social, affordable and cost rental housing in the city. **The delivery of social and affordable housing on public lands is a nationally recognised priority.**

3. Amend Section 3.4 Sustainable Neighbourhood Concept

Streets and Movement – insert text outlined in green as follows:

Design principles and measures should consider the following:

Connectivity and Permeability: Provide **universal** convenient access to places, particularly to schools and places of work. Routes within the area should be accessible for everyone including the needs of all users, including the elderly and people with a disability, and should be as direct as possible.

4. Amend Policy 3.6 Sustainable Neighbourhoods: Inner Residential Areas, to insert no. 3 - outlined in green as follows:

Prioritise the provision of new homes on designated Regeneration and Opportunity Sites in the Inner Residential Areas at appropriate scales to enable the development of new sustainable communities.

5. Amend Section 3.7 Sustainable Neighbourhoods: Inner Residential Areas last paragraph to insert text outlined in green as follows:

...Other strategic projects such as the Corrib go C ósta Galway Flood Relief Scheme will ensure neighbourhoods, in particular the Claddagh **and surrounding areas**, are resilient to the impacts of climate change.

6. Amend in Chapter 3, Table 3.1 Indicative Neighbourhood Areas in Galway, to include Bowling Green as a city centre residential area

Outer Suburbs	Established Suburbs	Inner Residential Areas	City Centre Residential
East	East	East	
Ardaun LAP area	Renmore	Bohermore	City Core
Doughiska	Mervue	College Road	Bowling Green
Roscam	Ballybaan	Lough Atalia	Woodquay
	Dublin Road		Long Walk
West	West	West	Henry Street Area
Knocknacarra	Dangan	Claddagh	
Ballyburke	Salthill	Shantalla	
Ballymoneen	Taylor's Hill	Newcastle	
Letteragh	Westside	Fr. Griffin Road	
North	North		
Castlegar	Tirellan		
Tuam Road	Ballinfoile		

Chapter 4: Sustainable Mobility and Transportation

4.1 - Context		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-148 Galway City Community Network	<p>Policy 4.1 General</p> <p>The vision for transport in the plan needs to go beyond the limitations of the GTS. The current plan relies too heavily on the GTS where no clear targets are set out for reduced private car modal share and increased modal share for walking, cycling and public transport is to be achieved. Submission requests the following edits to Policy 4.1 General:</p> <ul style="list-style-type: none"> • Recognise the ‘user hierarchy that promotes and prioritises sustainable forms of transportation’ set out in the Design Manual for Urban Roads and Streets (DMURS) and will respect this hierarchy in the planning, design and construction of all transport infrastructure. • Ensure connectivity between city and commuter towns through high quality and frequent train links and Park and Rides including the establishment of a network of Park and Rides that feed into a high frequency light rail system. • Ensure connectivity with pedestrian and cycling infrastructure and the bus network. • Set out the development of sustainable transport infrastructure to service the predicted increased population. • Develop a joint transport plan with the County Council particularly public transport and active travel links connecting new parts of the city to areas within the MASP. 	<p>CE Response</p> <p>Policy 4.1 supports implementation of GTS and sustainable mobility projects as they emerge.</p> <p>The Galway Transport Strategy (GTS) promotes the integration of land use and transportation within Galway City and suburbs and environs of Galway County MASP area. This plan is a joint Galway City Council and Galway County Council 20-year strategy prepared in partnership with the National Transport Authority. While full implementation will span a 20-year period, advancements to measures included in GTS, which are in progress will address concerns raised in this submission.</p> <ul style="list-style-type: none"> • The Cross-City Link initiative outlined in the GTS reinforces the pedestrian at the top of the hierarchy of modes and underpins the planned transformation of the city centre. • The Galway City Ring Road (N6 GCRR), currently on Judicial Review, aims to support development, improve accessibility and enhance connectivity to the city and areas to the west of the city. The Ring Road will support city-bound, cross-city and cross county trips that cannot be facilitated by other measures (RPO 3.6.7) • The Galway Transport Strategy and City Centre Management Plan have been prepared for Galway City, highlighting proposed plans and strategies to improve connectivity within the city and surrounding area. • The strategy includes traffic management, giving priority to walking, cycling and bus movements, modifications to the traffic network, management of parking activities and heavy goods vehicles, improvements to the public realm and use of ‘smarter mobility’.

	<ul style="list-style-type: none"> • Development of the Tuam Bus Corridor, Dublin Road Bus Corridor and a cross-city bus network, providing high frequency services that extend to Oranmore to the east and Bearna to the west, within the County. • Provision of a strategic cycle network, incorporating connections between residential areas and areas of employment and a primary network of routes including two greenways to Oranmore and Bearna. • Improved pedestrian facilities as a means of reducing traffic volumes in the city centre alongside improvements to pedestrian networks in suburban areas, including to places of employment at Parkmore and Ballybrit. • Provision of Park & Ride facilities on approaches to and periphery of the city, ensuring these link to the wider bus network. • Long-term development of Ceannt Station Quarter allowing the station to act as a key multi-modal interchange. • Double tracking of the line between Galway and Athlone, or a more limited provision of stopping bays, is identified as a strategic project to enhance accessibility and connectivity (RPO 3.6.9). <p>Section 3.3.11 of the Galway County Council Development Plan 2022-2028 references the above measures in the GTS which highlight connectivity between the City and the County. Public transport measures that will enhance public transport service provision are also included for in the County Development Plan. The plan states that the adjacent areas of Galway County are also included for and will be planned in a manner which allows for connection with the Galway City service proposals, and which will provide consistent and high quality infrastructure for the use of cross-boundary services.</p> <p>The review of the GTS, planned for 2023 will identify the appropriate areas to service with public transport. The review of the bus network will include a review of demand trip generators</p>
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		and attractors and will put forward a design for a network to meet the needs of the City area.
GLWC-C2-118 Ibec	<p>General Overview</p> <p>The Development Plan 2023-29 must support the delivery of key transport projects that are needed to develop a sustainable transport network across the city. It is essential that land use and transport are developed and planned through a coordinated approach to encourage the concept of a '15-minute city'.</p> <p>Greater modal change to sustainable forms of travel is needed to ensure targeted growth is infrastructure-led.</p> <p>The City Development Plan must support comprehensive public transport and active travel programmes in the Galway Transport Strategy (GTS). Metropolitan and regional growth are inter-dependent. Sustainable mobility will require a package of investment measures and behavioural incentives to deliver a lasting modal shift for commuting. These will not be cheap or easy to implement but are fully justified in terms of wider societal co-benefits, including improved air quality and public health. Investment in public transport services would offer significantly greater potential to displace private cars. Progressive measures aimed at improving the public transport system should be encouraged in all sustainable modes of transport. A major investment programme is needed to support the decarbonisation of our transport system, support alternative fuels, promote active travel, and build a user-friendly integrated public transport system.</p> <p>The Galway BusConnects Programme is vital to increase the capacity and frequency of bus services. The carbon transition, population and economic growth will drive growth in demand for bus usage.</p>	<p>CE Response</p> <p>Points raised reflect national and regional policy which is reflected throughout the plan. The 15 Minute City is supported in text and policy in Chapter 3 Housing and Sustainable Neighbourhoods (Policy 3.3(8), Chapter 4 Sustainable Mobility and Transportation (Policy 4.2 (6), Chapter 6. Economy, Enterprise and Retail (Policy 6.1(12), 6.1(13), and 6.12(7), Chapter 7; Community and Culture (Policy 7.5 (2).</p> <p>Greater modal change is supported throughout Chapter 4 of the draft plan and specifically in text under the Modal Change section, policy 4.3(10) public transport and in specific objectives 4.8 of the draft plan.</p> <p>It is agreed that accessibility and mobility within the region has a direct effect on the region's economic competitiveness. The GTS is embedded into the draft plan and will support implementation of the GTS and includes provisions to protect the capacity of the existing strategic national road network in the city and support improvements to the rail network. The draft plan designates Ceannt Station as a multi modal regional transport hub and recognises its importance in providing vital rail and bus links, intercity and regional services and continues to support improvement of access and facilities.</p> <p>Comments are noted and agreed with. The BusConnects Programme is supported throughout the plan and provided for in the GTS framework.</p> <p>The comments relating to not reducing car parking are noted, but are contradictory to the agenda of advancing sustainable transport and active travel measures. There is a recognition that</p>

	<p>Collaboration among relevant stakeholders is key to ensuring an effective modal shift to sustainable transport.</p> <p>While supporting the shift towards sustainable modes of transport, it is important that the development plan does not reduce, and makes provision for, adequate car parking facilities with urban centres to support customers in accessing retail services in the city.</p> <p>The Development Plan 2023-2029 must support measures which improve the service capacity of the Galway intercity rail network including a dual railway track from Galway city to Athenry.</p>	<p>a certain quantum of car parking is required, but it will be balanced with the context of supporting a modal shift to sustainable mobility in line with National Policy.</p> <p>Policy 4.3(7) Public Transport supports measures aimed to improve the service capacity of the Galway City inter urban rail transport network including for the development of commuter rail services, with a preference for a twin track approach from the city to Athenry.</p>
GLWC-C2-123 Owen Hanley	<p>Comments on TII Submission</p> <p>Concern noted with the recommendation from TII that Galway City Council change the land zoning map to include the N6 Ring Road at this late stage. This would mean the households and landowners affected would only have one opportunity at Stage 3 of this process to make submissions in relation to very impactful land zoning changes. I would have serious reservations about the rights and opportunities of individuals to engage with this process should the Council now make this decision, notwithstanding the view by TII that the Council should have already done so. Consideration should be given to how this should be handled mindful of the limited resources of any individuals that would be impacted.</p>	<p>CE Response</p> <p>Submission was referred to N6 GCCR design office for comment/clarification. They confirmed that N6 GCCR route is mapped correctly and reflects the reservation required to support the design, alignment and construction of the route.</p>
GLWC-C2-182 Reform, Central Policy and Communications Division - Dept. of Transport	<p>Policy updates</p> <p>The Dept. of Transport requests the following policy developments be included in the plan:</p> <ol style="list-style-type: none"> 1) That references in the draft plan to the 2019 version of DMURS should be replaced with references to the 2020 DMURS Interim Advice Note – Covid-19 Pandemic Response 2) That references to Smarter Travel, A Sustainable Transport Future, 2009-2020 policy should be replaced with references to the National Sustainable Mobility Policy which was published on 7 April 2022 	<p>CE Response</p> <p>Policy Developments: The submission is noted. Policy developments outlined will be included and updated in the plan where applicable.</p> <p>CE Recommendation</p> <p>a. Reference in the draft plan to DMURS will be updated and acknowledge all supplemental advice notes.</p>

	<p>3) References to Department of Transport, Tourism and Sport should be replaced with the Department of Transport (pages 100 and 350); and</p> <p>4) References to NTA's five year Walking and Cycling infrastructure Delivery Plan 2021-25 should be replaced with the NTA's forthcoming Walking and Cycling Infrastructure Delivery Plan (page 101)</p>	<p>b. Reference within the plan relating to Smarter Travel, A Sustainable Transport Future, 2009-2020 policy will be replaced with references to the National Sustainable Mobility Policy.</p> <p>c. References to Department of Transport, Tourism and Sport will be replaced with the Department of Transport.</p> <p>d. References to NTA's five year Walking and Cycling infrastructure Delivery Plan 2021-25 will be replaced with the reference to NTA's forthcoming Walking and Cycling Infrastructure Delivery Plan.</p>
GLWC-C2-141 National Transport Agency	<p>GTS</p> <p>The NTA recommend including a policy that Galway City Council will work with the NTA and other statutory stakeholders in the review and update of the Galway Transport Strategy.</p> <p>The NTA states an assessment of inter-settlement patterns across the City and County and to key settlements in neighbouring Counties and would assist with identifying travel patterns and associated transport infrastructure and service requirements for the city of Galway. The NTA recommend that the Plan specifies that movement at inter-settlement level will be addressed as part of the update of the GTS.</p>	<p>CE Response</p> <p>The NTA, City Council and County Council worked jointly in the preparation of the current GTS, while TII was a stakeholder in the process. The review and update of the GTS will be carried out in conjunction with Galway County Council and the NTA as referenced in Policy 4.1.5 General of the draft plan. It is also intended for stakeholders to be involved in this process and text will be added to this policy to reflect this.</p> <p>The GTS boundary includes the MASP Towns in the County and it is implicit that commuting patterns will be taken into account in the review and update of the GTS.</p> <p>CE Recommendation</p> <p>Amend Policy 4.1.5 General to include text in green</p> <p>Support the Galway Transport Strategy (GTS) and the outcomes of the planned evidenced based review to be carried out in conjunction with Galway County Council, and the NTA 'and other stakeholders'. This review will consider all transport modes including the feasibility of a light rail option and will not preclude the advancement of the Cross City Link route to planning consent stage.</p>

4.2 - Land Use and Transportation		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-148 Galway City Community Network	Policy 4.2. 6- proposed revised text to policy <u>The Council will deliver</u> the concept of the '15-minute city' <u>by ensuring</u> that land use policies facilitate residents to access their daily needs within a 15-minute walk or bike ride and thereby reduce the dependence on private car transport.	CE Response Comments are noted. The '15 minute city' is a concept to pursue and give sustainable choices by nature some will not be available within 15 minutes, so cannot include ensure. CE Recommendation Amend Policy 4.2.6 Land Use and Transportation to insert text in green “ <u>Aim to achieve</u> the concept of a '15-minute city' where land use policies facilitate residents to access their daily needs within a 15-minute walk or bike ride and thereby reduce the dependence on private car transport’
4.3 - Public Transport		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-27 Grainne Faller	Availability of Public Transport Increase frequency and reliability of public transport services Provide a night bus service Provide Light Rail	CE Response Policy 4.3(1) Public Transport supports the implementation of Bus Connects Galway and the overall bus transport network which will include for a high frequency cross-city network of services and all associated infrastructural requirements, traffic management and priority arrangements. The need for a night bus service is addressed in Policy 6.12(4) Retail Hierarchy of the draft plan which supports the development of a vibrant, inclusive, night-time culture and economy through sustainable measures and promotes the need for associated transport supports which would include would include for a night time bus service and measures to secure a safe environment, and for diversity in entertainment and creative offerings.

		<p>Commitment has been given in the draft plan under General Policy 4.1(5) which supports the Galway Transport Strategy (GTS) and the outcomes of the planned evidenced based review to be carried out in conjunction with Galway County Council and the NTA. This review will consider all transport modes including the feasibility of a light rail option and will not preclude the advancement of the Cross City Link route to planning consent stage.</p>
GLWC-C2-4 Paul Rush	<p>Commuting Patterns</p> <p>Requirement for better public transport links connecting residential areas of Knocknacarra to employment centres at Parkmore to facilitate modal shift. Opportunity to utilise extra capacity to extend bus lane on Seamus Quirke Road on Quincentennial bridge.</p>	<p>CE Response</p> <p>Comments are noted. The implementation of Bus Connects is supported in Public Transport Policy 4.3(1). The implementation of Bus Connects will provide better transport links to connect residential areas throughout the city to employment centres, including at Parkmore.</p> <p>Routing of bus services will be re-aligned as part of Bus Connects to provide better integration with journey demands between residential areas and employment areas. The draft plan acknowledges in text under the Bus Network Local heading that the Cross-City Link will be instrumental in increasing public transport ridership and active travel uptake to achieve a modal shift from car to sustainable modes. This is essential for the sustainable growth of the city to facilitate the NPF growth projections. This corridor will connect homes with places of work, study, retail and recreation, with improved public transport journey times and reliability.</p>
GLWC-C2-37 Galway Age Friendly Alliance	<p>Public Transport: Age Friendly</p> <p>Include a commitment to enable people as they age 'to get out and about' through the provision of accessible, affordable, and flexible transport systems in both rural and urban areas, and by supporting the design and development of age friendly public and community transport options and infrastructure, in consultation with local communities.</p>	<p>CE Response</p> <p>Accessibility Policy 4.6(7) promotes accessibility for people with disabilities and people with reduced mobility and requires that regard be had to best practice guidance from the National Disability Authority (NDA).</p> <p>The application of universal design principles to support the whole journey approach is also referenced throughout the draft plan. Particular reference is made in Chapter 4 under the Accessibility section, which states "As a signatory to the</p>

GLWC-C2-67 Margaret Casserly	<p>Ensure a commitment to examine bus shelters and seating suitable for older people at bus stops is provided in accordance with Guidance on Bus Stop locations" issued by NTA. More Bus Shelters Needed, in Particular at Ceannt Station. Galway city has an extremely high rainfall. Encouraging people to use public transport would be facilitated by the provision of more bus shelters, in particular at Ceannt Station where people wait to load onto regional buses, frequently blocking the footpath from the station. Especially in the light of the opportunity afforded by proposed development in this quarter, it seems sensible to include plans for a user-friendly public bus terminal building, or at the very least a covered area for people to wait.</p>	<p>Barcelona Declaration, Galway City Council is committed to promoting universal design and access for all. Public transport should be a key aspect in the delivery of this and requires a "whole journey approach". This would include for Age Friendly design relating to accessibility for public transport infrastructure.</p> <p>The plan includes many references to support the whole journey approach to improve the passenger experience. This would be inclusive of the program to upgrade bus shelters that is ongoing on a phased basis, supported by the NTA.</p> <p>Recent consent was issued in May 2022 for major upgrades for Ceannt Station. The URDF support applied for through Galway City Council has been successful and will support such upgrades. Text in Chapter 4 under the heading Public Transport Hubs supports modern modal interchange at this Regeneration site and it is implied that user friendly bus infrastructure will be part of any redevelopment. Public Transport Policy 4.3(8) supports measures to develop Ceannt Station as an integrated multi modal transport hub which facilitates easy interchange between national, regional and local transport services.</p>
GLWC-C2-148 Galway City Community Network GLWC-C2-59 John Brennan GLWC-C2-228 Galway Environmental Network	<p>Policy 4.3 Public Transport – Modal Share targets</p> <p>As a target for modal share is not included in the Galway Transport Strategy, GCCN requests that the following be added to Policy 4.3 Public Transport:</p> <ol style="list-style-type: none"> 1. A Public Transport modal share of X% will be achieved by the end of the plan period. [City Council to set a specific measurable target of X%]. 2. Final Plan should include Modal Targets linked to Climate Action Plan 2021 ambition of 'a significant cut in transport emissions by 	<p>CE Response</p> <p>Comments are noted with regard to the National Policy and the Climate Action 2021 ambitions to significantly cut transport emissions by 2030. There are a series of measures included in the GTS that have been incorporated into the plan to increase walking, cycling and public transport measures by 2030. Public Transport Policy 4.3(10) of the draft plan supports implementation of the modal change to public transport under the GTS through modal change targets for walking, cycling and public transport within the lifetime of the City Development Plan.</p>

	<p>2030 through measures including 500,000 extra walking, cycling and public transport journeys per day by 2030'.</p> <p>Include policies with the objective to significantly reduce car dependency in the city by 50%. The transport sector accounted for 20.3% of all carbon emissions in 2019, almost double that of the residential sector. Road transport accounted for 95% of transport emissions in 2019. Private cars account for 40% of transport final energy demand in 2018. Reducing private car use in the city by 50% would make a significant contribution towards achieving the 2030 target in the Climate Action Plan 2021.</p>	<p>Modal Share Targets will be introduced as part of the GTS review which is scheduled to commence in 2022 with a view to being completed in 2023.</p> <p>There is a commitment to support national targets including reduced Green House Gas (GHG) emissions. This plan under the Galway MASP Section (p.90) endorses the implementation of the measures contained in the Galway Transport Strategy (GTS) with the key transportation components for the MASP considered central to addressing the traffic congestion and GHG emissions to achieve change. See CE responses in Chapter 2 regarding climate action.</p>
GLWC-C2-190 An Taisce - Galway Planning Committee	<p>Support for Very Light Rail and proposed addition to Policy 4.1</p> <ul style="list-style-type: none"> Supports the concept of Transport Oriented Development (T.O.D). Supportive of the Gluas Committee's case that a feasibility study that will examine proposals for a citywide Light Rail or Ultra Light Rail Network must be sought, with the further sanction of the National Transport Authority. Proposes that an additional policy (7) be made to Policy 4.1 General to Support the Gluas Committee's case that the National Transport Authority conduct a feasibility study on Very Light Rail for Galway as part of the Review of the Galway Transport Strategy which is due to commence this year (2022) and be completed in 2023. <p>Advocates that local councillors and TDs seek greater government investment in rail, light-rail and bus services for Galway, and to ensure that these are upgraded to meet the needs of the ongoing 21st century.</p>	<p>CE Response</p> <p>Policy in the draft plan supports T.O.D especially as provided for on Ceannt Quarter and Harbour Regeneration sites.</p> <p>Text in the draft plan under the GTS heading states that "A planned evidenced based review of the GTS is due to be carried out in 2022 in conjunction with Galway County Council and the National Transport Authority (NTA), which will consider all transport modes including the feasibility of a light rail option and will not preclude the advancement of the Cross City Link route to planning consent stage."</p> <p>CE Recommendation</p> <p>Amend text in Section 4.1 under Galway Transport Strategy (GTS) heading to add text in green:</p> <p>"This Draft Development Plan will continue to progress a sustainable transport solution for the city and identify how it is intended to deliver and build upon the work of the GTS, while continuing to support the measures set out in the GTS. A planned evidenced based review of the GTS is due to commence be carried out in 2022 and be completed in 2023 in conjunction with Galway County Council and, the National Transport Authority (NTA) and other stakeholders. This process</p>

		<p>will include for public consultation, which will consider all transport modes including the feasibility of a very light rail/light rail option and will not preclude the advancement of the Cross City Link route to planning consent stage.”</p> <p>Amend Policy 4.1(5) General to include text in green</p> <p>Support the Galway Transport Strategy (GTS) and the outcomes of the planned evidenced based review to be carried out in conjunction with Galway County Council and the NTA. This review will consider all transport modes including the feasibility of a very light rail/light rail option and will not preclude the advancement of the Cross City Link route to planning consent stage.</p>
GLWC-C2-213 Gluas Very Light Rail Committee	Light Rail and Very Light Rail The Gluas committee welcomes the commitment in the National Development Plan 2021-2030, in the draft GCDP 2023-2029 and in the very recently published National Sustainable Mobility Policy, and associated Action Plan 2022-2025, to consider the feasibility of light rail for Galway City as part of the review of the Galway Transport Strategy which will commence later this year. We welcome the intention in the Action Plan 2022-2025 that an assessment of light rail for Galway will be completed as part of the review of the Galway Transport Strategy in 2023. Submission outlines the positive contribution that light rail and very light rail can make to the sustainable development of Galway City and the wider MASP area, the potential for zero emissions public transport system, which would contribute to achieving national targets as set out in the Climate Action Plan 2021, improved air quality and other associated health benefits. The following requests are made in relation to the draft GCDP 2023-2029:	<p>CE Response Similar issues to Submission 190 (above), response is the same.</p> <p>CE Recommendation As per proposed amendment in response to Policy 4.1(5) General- See Submission 190 response.</p>
GLWC-C2-227 Brendan Mulligan		
GLWC-C2-27 Grainne Faller		

	<ul style="list-style-type: none"> That the Gluas committee is recognised as key stakeholder in relation to light rail/Very Light Rail and is given the opportunity to meaningfully participate in the assessment of light rail/Very Light Rail for Galway. Given that it has been advocating for Very Light Rail for Galway for more than a decade the committee can and will make a positive contribution to the assessment process and That commitment 5 under Policy 4.1 General, in Chapter 4 Sustainable Mobility and Transportation, be amended to include a Very Light Rail option as well as light rail. The additional text requested is in green. Support the Galway Transport Strategy (GTS) and the outcomes of the planned evidenced based review to be carried out in conjunction with the Galway County Council and NTA. This review will consider all transport modes including the feasibility of a light rail option and a Very Light Rail option and will not preclude the advancement of the Cross City Link route to planning Consent stage. 	
GLWC-C2-144 Innovation Technology AtlanTec Gateway (itag)	<p>Improve Existing Rail Services</p> <p>itag supports the development of better rail services for Galway (page 92), but encourages investment to improve the existing rail services, esp. improving rail journey times and train frequency, to make rail a better and viable alternative to car and bus travel. Submission notes that such investment is urgently required and should be made before further extending the current rail network.</p>	<p>CE Response</p> <p>Plans are being advanced to enhance commuter rail services in Galway by Iarnród Éireann in conjunction with Galway County Council. Additional proposed investment will provide an additional platform and a passing loop of track at Oranmore, to increase train capacity at the station. This will allow for four trains per hour, doubling both frequency of service and potential passenger numbers. Subsequent enhancements proposed for by IE includes for new track sections between Galway and Athenry.</p> <p>It is estimated that the works at Oranmore will be completed by mid- 2025. It will increase capacity for commuting into Galway by train and will provide a more frequent and reliable service.</p>
GLWC-C2-123 Owen Hanley	<p>Mervue Area: Delivery of Infrastructure on Tuam Rd and Monivea Rd</p>	<p>CE Response</p> <p>The GTS supports public transport on the Tuam Road and Monivea Road. Development of the Tuam Bus Corridor Scheme</p>

	<p>The increases in population in the area from the Crown Square development must be proactively managed by Galway City Council to ensure adequate services and infrastructure is in place. Delivery of public transport infrastructure on the Tuam Road and Monivea Road must remain a priority.</p>	<p>is currently at design stage. The BusConnects will deliver the cross-city bus corridor and bus services, with reliability and priority as required, to deliver high-frequency, high-quality connected public transport.</p> <p>The NTA Parkmore Area Strategic Transport Framework plan also includes for the delivery of public transport infrastructure for both the Tuam and Monivea Roads as a priority.</p>
GLWC-C2-118 Ibec GLWC-C2-144 Innovation Technology AtlanTec Gateway (itag)	<p>International Connectivity</p> <p>Strategic assets supporting international connectivity include the Port of Galway and Shannon and Ireland West Airport Knock. The continued development of these assets and drivers for growth for the entire region is key to attracting investment, diversifying the economy and building resilience. This connectivity is critical to the economic development of the West and Ireland, including trade, tourism, FDI and business location decisions. The challenges presented by Covid, and Brexit require Ireland to enhance global connectivity through our airports.</p> <p>The City Council should support the continued operation and growth of both Ireland West Airport Knock and Shannon International Airport as an important element of transport and communications infrastructure. It is of critical importance that the Development Plan prioritise the enhancement of connections particularly by public transport and road network from the city to nearby airports to ensure connectivity to international markets which will be of benefit to the local economy. The success of our economic recovery will be shaped by our capacity to engage in international trade and connectivity.</p> <p>Shannon Airport- Improved access needed- Shannon Airport is seen as having a critical and strategic role in supporting commerce, industry and tourism for Galway and the wider region, and submission would like to see more acknowledgment of this in the plan with specific development planning to support continued improved access to Shannon Airport, incl. potentially a rail link.</p>	<p>CE Response</p> <p>Contents of the submission are noted.</p> <p>National Strategic Outcome (NSO 4) of the National Planning Framework includes for High-Quality International Connectivity and recognises the crucial role that is played by ports and airports. Section 6.3 of the RSES' sets out Transport Investment priorities for the region, to include International Connectivity, Road Network, Rail Network, Bus Network, Rural Transport, Walking and Cycling and Enabling Plans – Local Transport Plans.</p> <p>The draft plan under Section 4.1 context of the Sustainable Mobility and Transportation Chapter notes that the city transport network is pivotal in serving the inter-urban and inter-regional connectivity for its broad catchment area. The Council does include supports for improved connectivity to both, Shannon and Ireland West Airport Know (IWAK) is an important element of the transport and communications infrastructure of the region in attracting investment and in overall economic success.</p> <p>The draft plan text presently under the Bus Network- Regional section references that regional service offers a valuable service for tourists, particularly for trips to and from Dublin and Shannon airport and to other tourist destination cities and towns. Coach parking for tourists will continue to be provided within the city.</p>

	<p>The Port of Galway is recognised as a port of regional significance that helps to service Galway. It provides for sustainable transport of product to and from the entire region. It is currently used by various businesses including for the import of wind energy components, steel, timber and the export of scrap steel to name just some of the main tonnage throughput.</p>	<p>Section 6.3.9 of the draft plan, Marine Sector and Renewable Energy states that the Port of Galway is classified as a port of Regional Significance. Marine Sector and Renewable Energy Policy 6.9(4) of the draft plan supports the sustainable re-development and extension of the Port of Galway and the diversification and expansion of activities subject environmental, visual, economic viability and transportation considerations.</p>
GLWC-C2-7 JASON ROACHE GLWC-C2-127 Roselyn Carroll	<p>Bus Routes – Local</p> <p>Submission relates to Bus Route and Service with a couple of Bus stops, with one at Ballindooley Cross. Revert route of Bus 407 to as it is at present. Do not route Bus 407 into Dun Na Coiribe. Castlelwan Heights and do not remove aspects of the route which travel through Crestwood.</p> <p>Include commitment that transport routes will be provided that travel from east to west and vice versa without terminus in the city centre. Greater continuous connectivity is needed from East to West on high quality public transport without the need to change buses.</p> <p>Connectivity east to Huntsman/future bus hub and to Parkmore are poor for residents on Headford Road. They are forced to go back into the city centre instead of being facilitated to travel East. They do not need to traverse the centre of the city unlike residents in the West of City travelling East to Park More for example. A higher quality of service should be delivered to this community living so close to the city.</p> <p>Provide sustainable transport to and from Menlo Village to accommodate access to the city centre that does not rely on the private car.</p>	<p>CE Response</p> <p>Contents are noted. Bus Routes require an NTA license and are outside the remit of the development plan. In response to this submission however, it is noted that a central principal of the Galway Bus Connects project is to allow for direct connection/short time interchange from East to West at Eyre Square.</p>
GLWC-C2-146 Iarnród Éireann / Irish Rail	<p>Role of Rail for Sustainable Mobility Solutions and Services</p> <p>Submission welcomes and supports that the Council seeks to integrate land use and transport policies to achieve the delivery of a high quality, climate resilient and sustainable transport network for Galway City during the period of the Development Plan. Rail is fundamental to achieving the state's aim to halve emissions by 2030 and achieve net-zero emissions by 2050. Iarnród Éireann believe there are significant opportunities for Galway to achieve a large number of its economic development,</p>	<p>CE Response</p> <p>The CE notes and welcomes the submission from Iarnród Éireann/ Irish Rail. The draft plan provides for a number of text support and objectives which are consistent with and support a modal shift and more sustainable movement patterns including:</p>

<p>sustainable mobility, and climate change targets through sustained investment in its rail network.</p> <p>Iarnród Éireann has a key objective to facilitate a significant modal shift from the private motor car to public transport and thus to contribute to a significant reduction in road congestion and carbon emissions in line with policy objectives e.g. Smarter Travel, Climate Action Plan supports compact urban growth along its corridors which can greatly help reduce car dependency and subsequent emissions. Rail investment also supports the regeneration of areas with a rail stations proven to be one of the focal points of civic areas when development is planned appropriately.</p> <p>Investment in the Western regions rail network significantly supports the Government's objective of achieving balanced regional growth and development. Figure 1: Possible and Planned Enhancements to the Galway Area Rail Network</p> <p>Iarnród Éireann request that the development plan supports rail electrification as it is Intercity electrification forms part of Iarnród Éireann's long-term strategy to de-carbonise the heavy rail network and provide the benefits of significant journey time savings, improved reliability, enhanced passenger quality and lower operating costs.</p> <p>The development plan should consider and support the outcomes of the All-island strategic Rail Review on faster intercity connectivity, improved regional connectivity and freight which has commenced. The potential of the Western Rail Corridor will be considered in the context of the ongoing All-Island Strategic Rail Review which is being undertaken.</p> <p>Heavy rail- submission states that heavy rail can play an essential role in supporting the sustainable growth and prosperity of Galway City. The current rail network in Galway is an underutilised asset that can be developed with little impact on the road network, providing a step change in mobility with limited disruption to traffic flows from the east of the City.</p>	<ul style="list-style-type: none"> • General Policy 4.1(3) supports the implementation of the GTS which will advance the delivery and modal shift to more sustainable modes of transport. • Public Transport Policy 4.3(4) prioritises the provision of park and ride facilities to create the necessary modal shift to reduce car dependency. • Public Transport Policy 4.3(10) supports the modal change to public transport under the Galway Transport Strategy (GTS) through modal change targets for walking, cycling, and public transport within the lifetime of the City Development Plan. <p>Additional support towards achieving a modal shift is provided through the Integration of Land Use Planning and Transport Policy Objective and support and promotion of Active Travel improvements.</p> <p>Noted</p> <p>Text under the RSES heading in Chapter 4 of the draft plan references the supports of the development of a Strategy for the electrification of the rail network.</p> <p>Amend Section 4.3 Public Transport- Rail to include support for Strategic Rail review in the 2nd last sentence. "The NDP includes for the Dublin–Galway rail lines to be subject to an examination to move to higher speeds leading to improved connectivity to regional cities through improved rail journey times. This is being further examined under the All-Ireland Strategic Rail Review. The potential for double tracking of the railway line from Galway City to Athlone with increased service stops between Athlone and Galway will improve commuter...</p> <p>The CE notes the issues raised in relation to the underutilization of the current rail network. It is noted that there is potential to</p>
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<p>It can operate comfortably within an integrated transit system, transporting large volumes of passengers, more than any other mode, enabling potential compact dense development growth to be catered for by reliable frequent services. It is largely segregated from other transport modes, avoiding congestion and conflicts associated with road traffic, providing greater punctuality and reliability and leads to improved air quality levels - the average rail passenger km creates approximately 28g of greenhouse gases (GHGs) vs. 102g for road vehicle.</p> <p>A key deliverable to enhance rail services in the Galway area is the redevelopment of Ceannt Station as a major multi-modal transport interchange with URDF funding capable of accommodating enhanced inter-urban, commuter rail and bus services linked to active modes of travel such as walking and cycling.</p> <p>URDF funded works at Oranmore station with a second platform and passing loop will facilitate increased capacity and services on the line and Iarnród Éireann is planning to increase capacity on the Galway and Athenry section by staged double tracking which will improve flexibility of services and frequency and capacity.</p> <p>Iarnród Éireann supports opportunities to enhance the sustainable mobility of goods against a background of increasing emissions, road congestion, and HGV driver shortages and in line with its Rail Freight 2040 Strategy launched in December 2021.</p> <p>A Rail Freight Terminal is proposed for Galway a (TRFTs) which will expand the reach of rail freight and provide sustainable intermodal freight options to businesses across the regions. The exact location of the TRFT will be confirmed following the standard option selection and appraisal process.</p>	<p>realise enhanced sustainable regional connectivity and the City will continue to support IE to develop rail for passenger or freight services. The CE further notes the double tracking, expansion and funding for Oranmore and the redevelopment of Ceannt Station as a major multi-modal interchange that will deliver on some of this potential to cater for increased commuter and recreational passengers as well as assisting in achieving our modal shift and reduction in GHG.</p> <p>The draft plan sets out policy support in Public Transport Policy 4.3(8) for the development of Ceannt Station and also supports sustainable transport infrastructure and services. The function of the station, when coupled with the adjacent redevelopment of Ceannt Quarter will act as a collective hub for interchange between transport services and active modes of travel in the city.</p> <p>Noted</p> <p>The Council supports The Rail Freight 2040 Strategy as it is an ambitious vision positioning rail at the centre of Ireland's freight transport system. It recognises the sustainable benefits that rail provides and invites all stakeholders to work collaboratively on its' implementation over the coming years as a contribution towards achieving Ireland's climate objectives and wider strategic national outcomes.</p> <p>Amendment is proposed to text in Section 4.3 Public Transport in second paragraph under Rail heading to include text in green "Such works to the line may also benefit the provision of a rail freight service from Galway Port and is a strategic project that would enhance accessibility and connectivity in the region. The recent Rail Freight 2040 Strategy includes for an ambitious vision positioning rail at the centre of Ireland's freight transport system, recognising the sustainable benefits that rail provides as a contribution towards achieving Ireland's climate objectives and wider strategic national outcomes.</p>
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	<p>Iarnród Éireann request that the Development Plan support the further expansion of its Accessibility Programme, providing more accessible stations on the rail network. It also requests support for the development of customer Information Services.</p> <p>Iarnród Éireann welcomes the support of the Council in Policy 4.3 for the improvement of interchanges and request the Council to consider supporting the implementation of the multi-modal interchange strategy when developed by Iarnród Éireann.</p> <p>Iarnród Éireann supports Policy 4.3 in relation to park and ride. Iarnród Éireann is currently engaging with Councils and the National Transport Authority to develop a Park and Ride Strategy, which will be implemented in line with growing demand and request that the Development Plan support the implementation of this Park and Ride Strategy when it is agreed by all parties.</p> <p>Iarnród Éireann welcome the continued support of the Council where it is identified that opportunities exist to eliminate level crossings, in order to enhance safety.</p> <p>Iarnród Éireann advise in relation to the Murrough LAP area that intensification of use of the level crossing which provides access to Murrough House is not permitted. Iarnród Éireann will support Galway City Council with the development of suitable alternative access to develop these lands.</p>	<p>Iarnród Éireann's Accessibility Programme is welcomed. There is support in the plan for accessibility in relation to transport as provided in Road and Street Network and Accessibility Policy 4.6(7) The accessibility section of Chapter 4 of the draft plan states Galway City Council is committed to promoting universal design and access for all. Public transport should be a key aspect in the delivery of this and requires a 'whole journey approach'. This refers to all elements that constitute a journey from the starting point to final destination to ensure universal design practices are being implemented throughout the journey.</p> <p>Noted.</p> <p>Noted and welcomed.</p> <p>Noted. This is outside the remit of the Development Plan and will be addressed on a case-by-case basis.</p> <p>Comments are noted. An amendment is proposed to the Section 10.26 Murrough LAP to address the issue regarding access as per Chapter 10 CE Recommendations.</p> <p>CE Recommendation</p> <p>Include support for Strategic Rail Review in Chapter 4 under the Rail heading in the 2nd last sentence. "The NDP includes for the Dublin–Galway rail lines to be subject to an examination to move to higher speeds leading to improved connectivity to regional cities through improved rail journey times. This is being further examined under the All-Ireland Strategic Rail Review. The potential for double tracking of the railway line from Galway City to Athlone with increased service stops between Athlone and Galway will improve commuter...</p>
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GLWC-C2-190 An Taisce - Galway Planning Committee	<p>Proposed text addition to Policy 4.3.1- Public Transport</p> <p>While An Bord Pleanála has given its approval to the N6 Galway City Ring Road, it is unclear in what timeframe a go ahead will be given to construct the Ring Road. It is imperative therefore to maximize the modal shift from private cars to public transport within the city.</p> <p>The uptake of public transport is directly linked to the priority that public transport is given on available road. Major improvements in journey times on public transport can be achieved by re-allocating roadside car parking to bus lanes. This is most needed on road frequently used by buses. Priority for such measures would be College Road, Prospect Hill, Eglinton Street, Fr Griffin Road, Headford Road and University Road. The specific objective (#1) in Section 4.3 should therefore be changed to:</p> <p>Support the implementation of Bus Connects Galway and the overall bus transport network which will include for a high frequency cross-city network of services and all associated infrastructural requirements, traffic</p>	<p>CE Response:</p> <p>Comments are noted. Modal shift objectives are included in the plan to encourage and support a shift from private cars to public transport and more active travel measures within the city.</p> <p>Reduction of on street car parking is included for in the GTS and integrated into the delivery of Galway Bus Connects and GTS projects. Page 107 of the draft plan provides text support stating “In the context of on-street car parking the GTS includes for the gradual reduction in the level of such provision and the rationalising of access to off street facilities. This is in order to minimise car circulation within the city centre and to provide more road space for pedestrians, cyclists and public transport. It is considered that some rationalisation of on-street parking on routes outside of the city centre will also be necessary to facilitate bus movements and improve the walking and cycling environment”.</p>

	management and priority arrangements, including converting roadside parking to bus lanes.”	
GLWC-C2-69 Galway County Council	<p>Rail - Galway Co. Co</p> <p>Galway County Council notes in addition to rail infrastructure improvement works, funding has been granted to the Garraun Urban Framework Plan for a range of design elements to ensure delivery of key infrastructure. URDF funding was also awarded for the design of a local centre, a car park structure, landscaping and to carry out a density typology study.</p>	<p>CE Response</p> <p>Noted and welcomed</p>

4.4 - Sustainable Mobility - Walk and Cycle

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-20 Bernadette Carroll GLWC-C2-229 Friends of Merlin Woods	<p>Greenways</p> <p>Proposed greenway from Oranmore to Galway City should be provided on existing roads and connect to proposed commuter cycleway at Kirwin Roundabout. Greenways should be recognised as slow zones, suitable for families and vulnerable users and should not cause a negative impact of areas of biodiversity such as Merlin Woods.</p>	<p>CE Response</p> <p>Comments are noted. The Greenway route for the Oranmore to Galway section has not yet been decided. The route indicated in the plan is an indicative route only. The CE response and recommendation is set out in Chapter 5 in response to Submission 32.</p> <p>CE Recommendation</p> <p>Amend Section 5.7.1 Greenways, Boreens and Public Rights of Way- insert text in green after the 3rd paragraph as follows:</p> <p style="color: green;">In particular, the section of the indicative coastal greenway route between Ballyloughane and the eastern city boundary will be further considered following the establishment of the National Galway to Dublin greenway preferred route option which is due to be finalised in Q4 2022.</p>

		<p>In the event that this preferred national route option differs in alignment to the Galway City Council mapped indicative greenway route, the objective will not continue to accommodate a cycle route but will be to provide solely for an informal walking greenway route.</p>
GLWC-C2-27 Grainne Faller	<p>Prioritise hierarchy of road users/ Sustainable mobility DMURS</p>	<p>CE Response</p> <p>Comments are noted. The draft plan incorporates the sustainable transport hierarchy in text within multiple sections of the draft plan to accord with national policy, Section 28 Guidelines and DMURS. DMURS advocates the internationally recognised 'pedestrian first' Hierarchy of Road Users model to encourage more sustainable travel patterns.</p>
GLWC-C2-208 David Howard	<p>The Development Plan should specifically adopt a sustainable transport hierarchy. This hierarchy should specify a preference as follows, from most preferable to least preferable: walking/pedestrians, cycling, public transport, all other private transport. This should include the allocation of car parking spaces and transport routes (with footpaths of sufficient width throughout the city) to allow easy access into and out of the city from its residential suburbs.</p>	<p>References within the plan are made in Chapters 3, 4 and 11 in policy and development management standards.</p>
GLWC-C2-106 Michelle Carey	<p>Hierarchy of Road Users should be enshrined in all city development decisions, giving priority to pedestrians — particularly children and vulnerable road users — followed by cyclists.</p>	<p>This approach has been referenced in national policy under Sustainable Mobility Policy. One of the principles of this policy is for People Focused Mobility. Goal number 7: Design infrastructure accords to Universal Design Principles and the Hierarchy of Road Users model as set out in DMURS and is referenced in Chapter 4 of the draft plan.</p>
GLWC-C2-209 Lenny Antonelli	<p>Need to radically reduce emissions. Must give priority to pedestrians, vulnerable road users and cyclists over private motor vehicles.</p> <p>Active Travel</p> <p>Apply Hierarchy of Road Users to all matters of transport policy - vulnerable pedestrians first, then people walking, people cycling, followed by public transport, and other vehicle users. – DMURS</p>	
GLWC-C2-212 Galway Commuter Coalition		
GLWC-C2-148 Galway City Community Network	<p>Policy 4.4 Sustainable Mobility – Walk and Cycle</p> <p>GCCN requests that the following be added to Policy 4.4 Sustainable Mobility – Walk and Cycle:</p>	<p>CE Response</p> <p>Comments are noted.</p>

	<p>The Council will develop and implement a plan for an ambitious, safe and segregated pedestrian and cycling infrastructure.</p> <p>The Council will focus on the needs of pedestrians and cyclists in the city centre through the provision of wider footpaths and shared streets.</p> <p>The Council will prioritise the redesign of residential areas to prioritise pedestrian and cyclist safety through traffic calming measures, mobility lanes, safe walkways and zebra crossings.</p> <p>The Council will ensure the neighbourhoods are designed so residents can access most services in a 15 mins journey on sustainable modes of transport with clear set targets as to how this is to be achieved.</p> <p>The plan should include key indicators on safety that should be established with timescales and targets, measured and monitored on an ongoing basis. Such as: A walking modal share of Y% will be achieved by the end of the plan period. [City Council to set a specific measurable target of Y%]. A cycling modal share of Z% will be achieved by the end of the plan period. [City Council to set a specific measurable target of Z%]</p>	<p>Points raised are covered in Policy Sustainable Mobility-Walk and Cycle Policy 4.4 and national policy.</p> <p>As outlined Chapter 4 Transport and Mobility, Galway City Council is committed to new and enhanced cycling infrastructure including, but not limited to, segregated cycle lanes during the lifetime of this Plan as set out in the Galway Transport Strategy (GTS).</p> <p>In relation to the segregation of pedestrian paths and cycle paths, the design and maintenance of cycle paths and pedestrian paths and footpaths are operational matters that extend beyond the scope of the plan but will be considered as part of the future operational plans of Galway City Council.</p> <p>In addition to Sustainable Mobility-Walk and Cycle Policy 4.4, the '15 minute city concept' is further supported in neighbourhood design and policy is included in Chapter 3; Housing and Sustainable Neighbourhoods, Sustainable Neighbourhood Concept Policy 3.3(8), Chapter 4: Sustainable Mobility and Transportation Land Use and Transportation Policy 4.2(6) and Chapter 7: Community and Culture, Community Facilities Policy 7.5(2).</p> <p>There are a series of measures included in the GTS that have been incorporated into the plan to increase walking, cycling and public transport measures by 2030. Public Transport Policy 4.3(10) of the draft plan supports implementation of the GTS. Modal change targets for walking, cycling and public transport within the lifetime of the City Development Plan. Modal Share Targets will be included as part of the GTS review.</p>
GLWC-C2-59 John Brennan	<p>Walking infrastructure</p> <p>Submission claims that GCC has not prioritised the shift towards sustainable travel as outlined in the GTS. Worried about his children's safety on non pedestrianised streets in the</p>	<p>CE Response</p> <p>Content of submission is noted. The GTS, DMURS and Public Realm Strategy all include provisions to create a safer walking infrastructure, in an aim to make the street safer for all.</p>

<p>city centre. City is car centric with unacceptable levels of double parking and parking on footpaths. Pedestrianisation is treated as a second class citizen as a result of strategic decisions favouring car-centric culture.</p> <p>City has more potential to be child friendly with following:</p> <p>Continuous footpaths are not mentioned in the draft plan. This is not acceptable if ambition is to maximise mobility and safe movement/fundamental shift. Pedestrian experience on northeastern end of William Street from Quay Street to Spanish Arch and from Salthill village to the Prom are simply not acceptable. Ambition needs to be better than 'beg buttons' pedestrian lights at these locations. Pedestrians need to be prioritised over cars through design interventions including continuous raised footpaths and zebra crossings.</p> <p>Expansion of the ambition for Design for slower speeds within local streets in section 11.3 needs to beyond local streets.</p> <p>Final plan needs to deliver GTS key aim of 'reduce vehicular movement through the city centre, reduce vehicle speeds in the core city centre and to prioritise active modes (walking and cycling) and public transport in the city centre' and include 'the routing of traffic which currently passes through the centre to more suitable orbital routes around the core city centre area'.</p>	<p>Specific text and policies in the plan that reinforce this includes:</p> <p>Text under Figure 4.2 GTS- Proposed Cycle Network states that the primary network focuses on the provision of segregated safe routes and connections from dedicated cycleways and footpaths to existing networks linking schools, workplaces and residential areas as alternatives to vehicular transport.</p> <p>Policy 4.4 (6) Sustainability Mobility- Walk and Cycle Supports and promotes initiatives such as Park and Stride, Green Schools Travel and Safe Routes to School Programmes, School Streets and the concept of having safe routes to school.</p> <p>Specific Objective 4.8(17) prioritises improvements to pedestrian movements and safety within the city centre including extension of pedestrianisation, provision of wider footpaths and shared streets</p> <p>City Centre Policy 10.1(7) Maintains and enhance the quality of the city centre public realm and enhance accessibility and connectivity to and within the city centre through improvements to the network of streets, footpaths and public spaces and through implementation of the Public Realm Strategy.</p> <p>Comments noted and 11.3 accords with national policy.</p> <p>The GTS aims to reduce vehicular movements thru a key measure, the Cross-City Link. An application is scheduled to be submitted to An Bord Pleanala in the fourth quarter of 2022. This will reduce vehicular traffic movement thru the city centre and will enhance the environment for pedestrians in the city centre combined with measures in the Public Realm Strategy.</p>
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	<p>Increase pedestrianisation of the city centre particularly – Dominick St. Upper, Middle Street, St. Augustine St, Abbeygate St Lower and Market St.</p> <p>Wider footpaths than the minimums listed in the draft plan suitable segregated to negate the exceptionally poor parking habits and parking culture in the city which creates a hostile environment for wheelchair users or visually impaired citizens and visitors. Reference made to examples of bad parking from @GalwayCityofCars included in Appendix A.</p> <p>In line with Climate Action Plan 2021 off street parking should be removed from Dominick St. Upper, Middle Street, St. Augustine St, Abbeygate St Lower and Market St and generally within the city as per GTS.</p> <p>Introduce paid parking on Salthill Prom with 1 hour free.</p> <p>Benefits of and promotion of permeability do not have sufficient weight in the draft Plan as a means of promoting walkability.</p>	<p>Speed Limits are set through Bye-Laws rather than development plan policy. Road and Street Network and Accessibility Policy 4.6(6) of the draft plan does however support reduced speed limits in the city centre and residential areas of the city.</p> <p>This issue of paid parking is outside the remit of the plan.</p> <p>Chapters 3, 4, 6, 8 10 and 11 all reference and include permeability text or policy with an aim to improving ease of movement and connectivity to encourage and promote walkability and accessibility for all. Enhanced walking and cycling facilities will be promoted through greater permeability and increased networks, making these travel modes more attractive, accessible, safe, and healthier travel options.</p> <p>Retail Strategy Policy 6.11(5) in Chapter 6 seeks improved access and permeability in the city centre and other designated centres with particular emphasis on improving the public realm with a focus on an increase in pedestrianisation and enhanced access by public transportation, cycling and walking.</p>
GLWC-C2-212 Galway Commuter Coalition	<p>Walking Improvements</p> <p>Introduce a 30km speed limit in all residential areas of the city.</p> <p>Increase pedestrian crossings, reduce on-street parking, widen footpaths, raised intersections, chicanes, more one-way systems and changing of paving texture.</p> <p>Allow pedestrians to have a continual green light where there are traffic lights in place, cars can beg for permission to cross a</p>	<p>CE Response</p> <p>Speed Limits are set through Bye-Laws rather than development plan policy. Road and Street Network and Accessibility Policy 4.6(6) of the draft plan does however support reduced speed limits in the city centre and residential areas of the city.</p> <p>Policy throughout the plan supports the GTS and DMURS, which both support walking improvement as a priority. Associated projects will facilitate upgrade of pedestrian infrastructure.</p>

	<p>walkway by triggering a sensor in the ground (Eyre Square, Salthill, Prospect Hill, etc).</p> <p>Limited parking prevents cars from becoming the predominant element. Parking is provided intermittently, punctuated by trees, planters, lamp posts, and bike racks. Allowing more space for a friendlier walking environment.</p> <p>Add benches throughout the city and suburbs and ensure that residents of all abilities are enabled to be actively mobile.</p>	<p>These are operational issues and outside the remit of the plan; however issues raised have been referred to Transport.</p> <p>There are development standards for parking in Chapter 11, which includes for reduced car parking and increased cycle parking to accord with National Policy. This will support the roll out of the GTS, which in turn allows for more space to accommodate a friendlier environment for active travel.</p> <p>The Public Realm Strategy makes provisions for accessible benches with a key measure that benches are never more than 50-100 m from a network of spaces. The development plan also supports universal design and accessibility to ensure residents of all abilities are enabled to be actively mobile.</p>
GLWC-C2-82 Aran Murray GLWC-C2-118 Ibec	<p>Active Travel- Pedestrians</p> <p>There's a great opportunity for Galway to catch up on some of our European counterparts and lead the way in sustainable, active travel while also making the city a happier and healthier place to live. Galway city is far too car dependent for most of its journeys. More sustainable modes of transport such as walking, cycling, and public transport must be prioritised for the share of commuter trips by car to be reduced. Not only would this reduce emissions, but it would lead to more economic activity and an improved quality of life for residents and workers through shorter commutes, better air quality, and more leisure time.</p> <p>Pedestrians</p> <ul style="list-style-type: none"> • Change car culture - give the pedestrian the right of way by utilising some of the following mechanisms • Continuous Paths - make the car slow down at a junction allow right of way to Pedestrians • Increase the number of Raised Zebra Crossings - cars don't allow zebra crossings. Raising them forces the car to slow down. Similarly, there should be more of 	<p>CE Response</p> <p>Active Travel policies are supported in the GTS and the draft development plan in Chapter 4: Sustainable Mobility and Transportation. Policy 4.1 General and Policy 4.2 Land Use and Transportation support these measures.</p> <p>Pedestrian priority is also highlighted throughout the plan with reference to compliance with DMURS, which includes for a user hierarchy of the roads.</p> <p>Many of these points raised are operational and relate to the Transport work programme, which will be advanced on a case by case/project specific basis.</p>

	<p>them. They should be present outside all schools and community centres. An example on St Mary's Rd. The bridge club should have one linking it to the school carpark where most of the elderly people park.</p> <ul style="list-style-type: none"> • Reduce crossing distances for pedestrians - bring in verges to slow down traffic and lessen the distance for pedestrians to cross. • Improve Paths - Many of the current paths around the city centre are not universally designed. Paths can be uneven and slant towards the road, making it difficult for elderly people, buggies and wheelchairs. Curbs can be too high also, making them difficult to navigate. • Deter/Police poor parking - Cars are often parked on footpaths obstructing Pedestrians, forcing them on the road to navigate around. • Make the city more permeable to Pedestrians - create safe walkways through the city encouraging healthy exercise and shorter journey. • Increase mechanisms to slow traffic near schools. 	
GLWC-C2-118 Ibuc	<p>Installation of new cycle lanes or projects involving the reorientation of traffic and/or access routes should occur after early consultation with the local businesses have been carried out. It is important that the design can work in terms of accessibility for all.</p> <p>Regulators will need to ensure that the use of e-scooters and bicycles, can be safely and satisfactorily deployed across the city. Secure storage facilities for both bicycles and e-scooters are essential to encourage the use of these more sustainable modes of transport. International best practice and lessons learnt from other cities should inform their deployment here.</p>	<p>CE Response</p> <p>Comments are noted. All projects are subject to public consultation.</p> <p>The concerns regarding the regulation of e-scooters and bicycles are noted, but outside the scope of the development plan.</p>
GLWC-C2-190 An Taisce - Galway Planning Committee	<p>Modal Shift- Prioritisation of pedestrians and cyclists</p> <p>A modal shift to cycling and walking will require the prioritisation of pedestrians and cyclists through the provision of continuous</p>	<p>CE Response</p> <p>GTS sets out a comprehensive transport strategy for the sustainable mobility in the city. The measures outlined in the</p>

	<p>footpaths and protected cycle lanes and other appropriate measures. Unconvinced that the real need to concentrate on developing a roads transport system which also benefits people who may be walking or cycling, before installing carriageways which simply move vehicular traffic ever faster through city streets has been realised. Galway City is still very far from achieving its own stated aim of developing a "Safe, Child friendly, Disability friendly, Pedestrian friendly, Cyclist friendly City.</p>	<p>GTS are linked to a 20 year implementation programme which will allow for funding applications in particular to the NTA for phased implementation based on priority basis. This is an ongoing process.</p> <p>Specific Objectives as included in Section 4.8 of the draft plan support measures in the GTS to achieve a modal shift and include for modal change policy for public transport, sustainable mobility- walk and cycle, transport demand measures and road and street network and accessibility. The implementation of the GTS and the development plan policies and specific objectives will further progress the city's' aim.</p>
GLWC-C2-27 Grainne Faller	Provide Segregated Cycling Infrastructure	CE Response
GLWC-C2-208 David Howard	An integrated network of high quality, segregated cycleways is urgently needed to promote active and sustainable travel in the city. Submission call for the segregation of all existing cycle lanes from the road carriageway; Increase cycle lanes - make it safer to travel by bike	Segregated cycling infrastructure is part of the overall strategy for active travel. The GTS provides for a cycling network, where possible, to be fully segregated, with cyclists physically separated from motorized traffic. In other cases, the networks includes on-road cycle lanes and/or wide bus lanes to cater for both buses and cyclists along the same route.
GLWC-C2-106 Michelle Carey GLWC-C2-209 Lenny Antonelli GLWC-C2-59 John Brennan GLWC-C2-82 Aran Murray		In addition to this, it is intended that proposed traffic management measures will limit access to parts of the city for private motorized vehicles, thereby improving the environment for cyclists, pedestrians and public transport vehicles. The review of the cycle network will also form part of the scheduled GTS review.
GLWC-C2-104 Dave Mathieson	Cycle Network-needs for cyclists to have coherent, segregated routes that they can use to traverse the city The cycling and walking section makes heavy reference to the GTS which, although in place since 2016, has delivered virtually no improvements to cycle infrastructure in the city. As a reminder, there are almost no cycle paths between Salthill and Renmore and there is no safe route for cyclists through the	CE Response The GTS is 20 year strategy, which includes for a roll out of cycling and walking improvements. There is an upcoming review of the GTS, scheduled to commence in 2022 and to be completed in 2023, which will provide the opportunity to re-examine future cycling and walking measures/

	<p>centre of the city.</p> <p>There are several piecemeal improvements (e.g. new pedestrian / cycle bridge over the Corrib) but the plans show very little regard for the needs for cyclists to have coherent, segregated routes that they can use to traverse the city. The cycling map itself in the document shows no route for cyclists through the city centre.</p> <p>As the recent vote over a temporary cycleway in Salthill shows, some residents, businesses and councilors are extremely resistant to anything that will reduce car parking. There is nothing in the GTS or the plan itself to indicate how this resistance will be countered. Since a cycle network of the kind that is outlined in the document will absolutely require space to be taken away from cars, and given the 8 years remaining to achieve 50% emissions reductions, there needs to be a lot more concrete detail available right now on exactly where, and how, these improvements will happen.</p>	<p>Cross city link includes for a cycle route through the city. Wherever possible, these routes will be separated from traffic by kerbs or edge markings. Public realm improvements are also proposed along the Cross-City Link to provide an enhanced environment for cycling and walking for journey to and through the centre. GTS Primary Cycle network is included in Chapter 4 (Fig. 4.2) and includes two Greenways providing connectivity for cyclists from city environs, one along the western bank of the River Corrib from Galway City to Oughterard and one align the coast from An Spideal to Oranmorem passing through Galway City, which will connect with the Dublin- Galway Cycleway.</p> <p>As noted above, the upcoming review of the GTS will provide the opportunity to re-examine cycling and walking improvements, including that for the Salthill area.</p>
GLWC-C2-83 Noel Porter	<p>Segregated Cycle Lanes</p> <p>Safe cycle lanes need to be implemented to encourage the use of bicycles or other forms of micro transport. Off road, segregated cycling facilities would afford a lot more comfort and safety to the people who choose to use them, like the following example. Cycling facilities should where possible be completely separated from heavy traffic.</p> <p>Include Cycle lanes on the following roads:</p> <ul style="list-style-type: none"> • Parkmore industrial estate East and West. • Include a primary cycle route from Menlough neighborhood to the city center, preferably beside the waterways 	<p>CE Response</p> <p>While segregated cycling infrastructure is part of the overall strategy for active travel as set out in the GTS, this cannot be committed to on every road. The standards in the National Cycle Manual (2011) which takes into account the hierarchy of users and hierarchy of interventions- including reducing volumes and speed of vehicles and design improvements. There are updated standards currently being developed, which will replace the current National Cycle Manual and inform future infrastructural design.</p>

	<ul style="list-style-type: none"> Implement segregated cycle facilities at the junction between Doughiska road (labeled as Old Ballybrit Road) and Monivea Road. This junction is currently extremely hostile for people who commute by bicycle. 	
GLWC-C2-212 Galway Commuter Coalition GLWC-C2-127 Roselyn Carroll	<p>Cycling Improvements</p> <p>Design greater integration of cycling and public transport, providing parking at larger bus stops and stations, with a cycle-parking hub at Ceannt Station.</p> <p>Construct as a priority a network of greenway spines to and through the city along with a world class primary cycling network. The maintenance and development of high-quality walking and cycling infrastructure is necessary to support active travel and to ensure that every aspect of a commuter's journey is safe. Developing and improving the greenway network in the city is critical to supporting active travel.</p> <p>Apply the provisions of the Jacobs report on the shared Bike scheme (ie provide two-way cycling on one way streets and provide bike access through pedestrian zones).</p> <p>Cycle parking standards for private developments should conform to national standards and guidelines. Provision should be made for inclusive cycle parking for non-standard cycles and those who use bicycles as a mobility aid.</p> <p>Expansion of the bike share scheme</p>	<p>CE Response</p> <p>Ceannt Station is a designated multi modal interchange. This implies that cycle parking hubs will be required to be provided in developments.</p> <p>This is addressed in Chapter 5: Natural Heritage, Recreation and Amenity. It is inclusive of Galway City Council's approach to greenways. Example of Terryland Forest Park.</p> <p>The Jacobs report [commissioned by GCC circa 2007/2008] has been superseded by GTS in 2016.</p> <p>Standards as proposed are set out in Chapter 11 - Section 11.3.1 (h). This plan includes a separate table 11.3 for cycle parking requirements for residential developments and Section 11.10.4 includes for cycle provision for commercial developments. It is agreed that provision should be made for inclusive cycle parking for non-standard cycles and those who use bicycles as a mobility aid. Text has been amended in Chapter 11 to reference this. (See Chapter 11 CE recommendations)</p>

		<p>Galway City Council promotes and supports bike share schemes. The Council will continue to work with the National Transport Authority to further develop the scheme during the lifetime of this Plan.</p> <p>Bike share management and patronage needs to be reviewed to address issues with bikes causing street clutter.</p> <p>CE Recommendation</p> <p>See Chapter 11 CE Recommendations.</p>
GLWC-C2-59 John Brennan	<p>Cycling</p> <p>Concerns about encouraging children to cycle to school. Poor indication of Active Travel goals. Draft plan should give more weight to promoting and encouraging safe routes to school 2021 initiative.</p> <p>Increased Permeability as the central tenet of the 15-minute city plans; Pedestrian and cycleway gaps to be provided in all boundaries between housing estates to link quiet roads and encourage citizens to remain out of their cars; Widening of gaps in existing walls, where limitations are currently in place reducing permeability;</p>	<p>CE Response</p> <p>Safe Routes to School 2021 is encouraged and supported in the draft plan with a heading entitled Safe Routes to School in Chapter. Sustainable Mobility- Walk and Cycle Policy 4.4(6) supports and promotes initiatives such as Park and Stride, Green Schools Travel and Safe Routes to School Programmes, School Streets and the concept of having safe routes to school.</p> <p>As part of the Safe Routes to School programme, Galway City Council is engaging with the school communities of Radharc na Mara NS, Scoil Bhríde NS, Scoil Iognáid NS, GET NS and St Joseph's Special School to develop a 'front of school' design to make it safer for children walking, cycling and scooting to school. The design will also benefit residents and commuters walking and cycling through their neighbourhood.</p> <p>Comments are noted and it is agreed that increased permeability will play a major role in creating the 15-minute city. New developments will be required to address permeability as part of their development proposals through the inclusion of DMURS compliance statements. The GTS, the Public Realm Strategy (PRS) and Chapter 3, Chapter 8 and Chapter 11 of the draft plan all support measures to increase permeability. Existing developments will inevitably take more</p>

		time to retrofit but will be done on a case by case basis, as opportunities to improve permeability arise under the permeability programme in transport section/NTA.
GLWC-C2-173 Galway Cycling Campaign	<p>Improvements for Cycling and Walking Policies, Specific Objectives and Planning Standards in the draft plan</p> <p>Policies, specific objectives and planning standards in the current draft plan could and should be improved across the following range of areas:</p> <ul style="list-style-type: none"> • Improved provision of cycle-parking across the city and in new developments. • Connectivity and permeability for walking and cycling • Design and management of residential streets • Inclusive access to outdoor amenities and green space • Walking and cycling-friendly streets and junctions 	<p>CE Response</p> <p>Improvements relating to cycling and walking policies are addressed across Chapters 3, 4, 8 and 11 of the draft plan. There are also measures included for throughout the GTS, DMURS and PRS and all provide policy guidance in the development of the draft plan.</p>
GLWC-C2-82 Aran Murray	<p>Active Travel- Cycling</p> <p>Improve and increase bike parking spaces - there isn't enough. Apply the standards and add shelters. Move them nearer to destinations, do not position them at the back of a parking lot. Encourage this sustainable transport method</p>	<p>CE Response</p> <p>There is text in Chapter 11 which includes for covered parking where appropriate. There is a need for flexibility to allow for built and natural heritage sensitivities.</p>
GLWC-C2-7 JASON ROACHE GLWC-C2-127 Roselyn Carroll	<p>Active Travel and Safety</p> <p>Provide continuity in the delivery of Active Travel and priorities walking and cycling. Major investments such as Kirwan Junction are connected to walking and cycling infrastructure segments that do not reflect a continuous and joined up management of delivery is ongoing in GCC.</p> <p>Upgrade the cycle network to provide segregated cycle route on both in and out bound on Headford Road between Kirwan and Bothar An Choiste.</p>	<p>CE Response</p> <p>These items raised are operational issues which are noted and which form part of the Transport work programme. These have been referred to Transport.</p> <p>This forms part of Secondary Cycle Route.</p>

	<p>Urgent need for a safe footpath on the main Headford Rd between Ballinfoile and Ballindooley Cross as current situation is extremely dangerous with no footpath and no wide margin on the road. This doesn't allow for safe walking and cycling.</p> <p>The absence of lights along this section makes it very dangerous at night and especially in the winter.</p> <p>A cycle path would be great to have along this section too, ending it out from the Kirwan Junction.</p> <p>Provide for the provision of a footpath along Menlo Road and design the road such that cyclist can travel safely on this route as per new national policy.</p>	
GLWC-C2-16 Nelius Kavanagh	<p>Objection to Clifden Railway and Pedestrian Bridge</p> <p>Concern about the impact of the construction of the Clifden Railway and Pedestrian Bridge on the Riverside, Woodquay area. Specifically: an increase in the volume of pedestrians and cyclists in the area creating potentially a 24 hour a day thoroughfare. Exacerbate existing antisocial behavior issues including public gatherings (parties) with alcohol consumption, noise, unruly behaviour, littering, theft and damage of lifebuoys. No access to the bridge/walkway from Waterside, Riverside, Woodquay area to maintain amenity of the area, Access should only be permitted from NUIG on west and Dyke Road on the East.</p> <p>Area known as 'the plots' (boundary of Galway Rowing Club and Commercial Boat Club) known as den for 'anti- social behaviour and late night revelry' Design of bridge/walkway should seek to address these issues,</p> <p>Suggest that bridge should be covered but not weatherproof for safety and to be of most benefit to users and to prevent bridge</p>	<p>CE Response</p> <p>Specific Objective 4.8 (15) of the draft plan provides for a new pedestrian and cycle bridge on the piers of the Old Clifden Railway Line from the Headford Road Regeneration area to NUIG campus. This is a URDF supported project which is committed to support further investment in sustainable transport measures as part of the Growth Framework as identified in the RSES.</p> <p>The MASP includes an objective to deliver a cycle network in Galway City, comprising a core, primary, secondary and feeder cycle network. The Clifden Railway Pedestrian and Cycle Bridge will support connections between the Greenways, and the Galway City Cycle network. The secondary Cycle Network in the GTS includes for a new bridge for pedestrians and cyclists over the River Corrib. Delivery of the bridge accords with all of these policies.</p> <p>General concerns raised are noted, however they relate to project design, management and implementation and can be addressed through the public consultation process which will occur during the project development. Consultation will include</p>

	<p>from being used as a diving platform and prevent throwing of missiles into the river.</p> <p>Impact on access to Steamers Quay, one of only 6 quays on Lough Corrib suitable for launching large vessels.</p> <p>Impact on commercial boating businesses on Lough Corrib.</p> <p>Summary:</p> <ul style="list-style-type: none"> • That no exit or entry should be available for the walkway into the street at Riverside – only at the Dyke Road; • That the walkway will be appropriately enclosed to protect the public on the river and on the walkway, and prevent anti-social behaviour, littering etc.; • That the walkway should pass over Steamers Quay at an adequate height to allow vessels continued access to the quay. • That a long term programme of maintenance and security will be implemented to prevent degeneration of the area. 	<p>general public and key stakeholders and enable discussion on exact design detail and capacity to incorporate good surveillance and safety measures.</p>
GLWC-C2-29 Niall OFlaherty	Proposed Pedestrian Bridge- Woodquay to NUI Galway Objection	CE Response See Response for Submission 16 as outlined above.
GLWC-C2-47 Patsy Casserly	Using the existing walking bridge closer to the University (NUI Galway's O'Shaughnessy Bridge) as a pedestrian / cycle way would be more beneficial as it already exists and that funding for the proposed bridge (NUIG / Woodquay Bridge) could be better used for more important Projects around Galway City.	
GLWC-C2-51 Corrib Rowing and Yachting Club	Incorporating NUI Galway's O'Shaughnessy Bridge into the New Pedestrian Bridge Planned for the Salmon Weir. Creating a more inclusive Green Way with the City.	
GLWC-C2-48 Laura Shanley	<ul style="list-style-type: none"> • Concerns with the height of the bridge, walkway structure and potential navigation issues. The height 	

<p>GLWC-C2-34 Vincent McKey</p> <p>GLWC-C2-36 Nelius Kavanagh</p>	<p>may not able to facilitate the passage of sailing boats with masts and other boats and water vessels.</p> <ul style="list-style-type: none"> • Concerns the erection of this bridge will impact both leisure activities and commercial businesses on Lough Corrib. • Use of the quay at Steamers Quay, Woodquay, would be severely reduced and inhibited by the construction of the bridge at the pillars of the former Galway-Clifden Railway Line. • Past design was a drawback bridge, giving a right of way to all vessels using the river to access the lake. • Concerns with the safety and security. The bridge passes over the property boundaries of the Corrib Rowing Club and Yachting Club and could result in anti-social behaviour, damage to boats, leisure users of the river and injuries to people below. Concerns are also expressed with the interference of safety equipment, vital for all water users and public along the shoreline. • Location of bridge, just upstream of the Weir raises concerns. If any member of the public fell into the water at this location, they would immediately be swept down the weir with dire consequences. • Concerns with after costs of this project on the Council, the Garda, NUI Galway, the Corrib Rowing and Yachting Club due to increased littering, anti-social gatherings and increased security costs. 	
<p>GLWC-C2-61 Dan Carey</p>	<p>Bridge at Old Clifden Railway line from Woodquay to NUI Galway</p> <p>Submission in strong support of proposal to construct bridge along railway line at Woodquay from long time and committee member of CR&YC.</p>	<p>CE Response</p> <p>Content of submission are noted and welcomed.</p>

<p>GLWC-C2-33 James McCarthy</p> <p>GLWC-C2-32 Save Roscam Peninsula</p>	<p>Roscam- Athlone to Galway Cycleway</p> <ul style="list-style-type: none"> Use lands at the Roscam Pitch and Putt for the Roscam Peninsula Section of the Athlone to Galway (off road) Cycleway now in mid design/planning stage. This undisturbed green-golf course lands form the only straight line, sufficiently wide and unimpeded Natural Greenway and Nature Corridor suitable for the East Galway Section of the mandated Athlone to Galway (off road) Cycleway. A map is submitted as part of submission which depicts red arrows to illustrate the path for the off road bike path from Oranmore to Galway Centre through existing Rosshill Par 3 Golf Course. The Athlone to Galway (Off Road) Cycleway –East Galway City Section – continues west from the western end of the OFF ROAD ROSCAM PENNINISULA GREENWAY SECTION proposed here into Kiniska (i.e. south side of the railway line at MURROUGH) and on towards Ballyloughnane. This is a hidden contiguous land/sea green/blue coastal nature corridor rich in plant, bird and animal biodiversity that must be protected and preserved. This map suggests that the proposed cycle route in the draft plan around Roscam Peninsula should become a simple wood based walkway as denoted by green arrows to provide a low cost and low maintenance access to the area and would preserve the remarkable natural environment of this area. A cycleway around the peninsula would require major building works, landscape alterations, degradation of existing natural habitats and would be more expensive to build and maintain. A walkway would also be easier/faster to obtain all the necessary approvals rather than a heavily engineered hard surface cycleway and separated pedestrian path. 	<p>CE Response:</p> <p>Concerns are noted.</p> <p>With regard to the objective for a greenway route at Roscam, it is recommended that the indicative route as mapped be retained in the draft plan for the present, and that text of Section 5.7.1 be embellished to address the concerns of various submissions. The preferred national greenway route option is scheduled to be finalised in Q4 2022. In the event that this proposes an alternative route, the current objective can be examined. A default option would be to retain the objective for the route to function as an informal walking trail which would support the objectives of the plan in terms of enhancing recreational amenity and accessibility to the coastline of this part of the city. It is recommended that the text of Section 5.7.1 be amended to reflect this.</p> <p>Chapter 4 includes a specific objective 4.8(12) to develop the National Greenway Network in the city, in particular the National Galway to Dublin Cycelway and the Galway to Clifden Greenway in conjunction with the NTA, TII and Galway County Council.</p> <p>CE Recommendation</p> <p>Amend Section 5.7.1 Greenways, Boreens and Public Rights of Way- insert text in green after the 3rd paragraph as follows:</p> <p>In particular, the section of the indicative coastal greenway route between Ballyloughnane and the eastern city boundary will be further considered following the establishment of the National Galway to Dublin greenway preferred route option which is due to be finalised in Q4 2022.</p> <p>In the event that this preferred national route option differs in alignment to the Galway City Council mapped indicative greenway route, the objective will not continue to</p>
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	<ul style="list-style-type: none"> • This proposed off road cycleway has advantages to include: economic, touristic, heritage benefits, will provide a unique natural capital plus biodiversity protections for Galway City long into the future, improving city mobility and delivering health benefits for all. • This alternative cycleway does not have the same disadvantages as other alternative cycleway proposals. It would 1) offer a location whereby co-positioning of roads and cycle/walkway posing physical risks for cyclists and pedestrians would not be an issue, 2) would have no significant road/cycleway intersections 3) Have adequate width as it offers at least 100 m width over much of this Greenway Section which could support a reasonable two way cycle path and a reasonable two way walking path, plus a small green border on each side to preserve a minimal nature corridor, making it an ideal and optimum Greencycling and walkway. • Reference is made to the unsuitability of the 15-20m public slip of land between the railway line and the new "Ross Allta" housing estate in Rosshill that has been an idea at this location. It would not offer visual appeal, would not be wide enough to serve its purpose, given the isolated location it could become a dangerous stretch of the Greenway and the slip should be kept unused in case of future needs associated with the railway line. • The development of the off road Roscam Peninsula Greenway Section, as proposed here, as part of the Coastal Galway to Oranmore Greenway and its accompanying coastal wood based Walkway around the Roscam Peninsula will set a major marker that the City, the County and the State is serious to immediately provide its citizens with viable, safe and healthy 	accommodate a cycle route but will be to provide solely for an informal walking greenway route.
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	<p>promoting alternative transport options to carbon emitting vehicular transport.</p> <ul style="list-style-type: none"> Consider routing the proposed greenway through the former Par 3 Golf course at Rosshill to avoid impact on protected sites 	
GLWC-C2-59 John Brennan GLWC-C2-212 Galway Commuter Coalition GLWC-C2-127 Roselyn Carroll GLWC-C2-82 Aran Murray	<p>Removal of all “kissing gates” from the city, not least to encourage the use of cargo bikes, a stated ambition of the Climate Action Plan 2021;</p> <p>Include reference to removal of obstacles along cycling routes as per NTA guidance.</p>	<p>CE Response</p> <p>Noted. Recreation and Amenity Department is in the process of working on a combined design response with the Transport Section and Housing/Social Inclusion that will address issues of accessibility and include for an appropriate alternate to design to kissing gates in the City.</p>
GLWC-C2-59 John Brennan	<p>Greenway</p> <p>Supports the provisions of a fully segregated, 2-way cycleway along the Indicative Greenway Cycle Network on the route shown within Map A attached to the Draft Plan.</p> <p>Provision of a primary network of cycle routes comprising of two greenways connecting into the county settlements – the Oranmore to the City Centre and onwards to Bearna Greenway and City Centre to Oughterard Greenway.</p>	<p>CE Response</p> <p>Noted. The plan sets out an integrated network of greenways in the city. Greenways are provided for through the GTS. These are routes segregated from the road and exclusively reserved for pedestrians and cyclists. In addition to these routes, the greenway network also includes for less formalised routes and trails which are provided within amenity areas and which may not have the same standard of accessibility. The primary network focuses on the provision of segregated safe routes and connections from dedicated cycleways and footpaths to existing networks linking schools, workplaces and residential areas as alternatives to vehicular transport. These are designed to accommodate medium distance journeys. This level on the network also includes for two greenways providing connectivity for cyclists to and from city environs, one west to east linking Bearna and Oranmore and onwards, and one to the north crossing the River Corrib towards Moycullen. These</p>

	<p>Provision of a core, secondary and feeder cycle network which includes segregated cycle routes, on-road cycle lanes and /or wide bus lanes to cater for both buses and cyclists along the same route.</p> <p>Update the Final Plan to include a permanent Greenway along the indicated route to match ambitions set out in RSES. This objective needs leadership from our city planners and elected officials.</p> <p>Provision of additional primary routes including cross-city routes to the north of the city and some key north-south links. Develop a secondary cycle network that will comprise connections from residential areas and areas of employment to the primary network accessing key destinations.</p>	<p align="justify">align well with the national approach as defined in the Strategy for the Future Development of National and Regional Greenways (July 2018).</p> <p>The GTS includes for a core, secondary and feeder Cycle Network which supports each other and reinforces connections across the city and environs. Where possible the proposed routes are fully segregated from motor traffic. In other locations, the network includes on road cycle lanes or sharing facilities with bus lanes. Where it is proposed to limit traffic, particularly in the city centre, the cycling environment will become much safer and more attractive. Chapter 5: Natural Heritage, Recreation and Amenity sets out the policies for the development of other greenway networks which identify key connections and linkages and have more of a recreational function, some with a capacity for walking only and some with potential for both walking and cycling.</p> <p>Noted – Dublin Galway Greenway route will remain indicative until final route is identified.</p> <p>GTS provides for the development of the cycle network. The review of the GTS will provide an opportunity to re-examine the suitability of routes and look at additional routes and links.</p>
GLWC-C2-212 Galway Commuter Coalition	<p>Public Transport- Buses & Bus Stops</p> <p>We welcome the plans outlined for public transport and that bus stops will be within 10 minutes walking distance from where you live. Within this walk, benches should be in place to facilitate those with disabilities or the elderly to be able to reach a bus</p>	<p>CE Response</p> <p>While the importance of bench locations are appreciated, these are better addressed in other plans and specific projects and implemented through work programmes. The Public Realm Strategy does make provisions for accessible benches</p>

	<p>stop. Benches and shelter from the wind and rain at all bus stops should also be provided.</p> <p>Allow buses to have dedicated right of way within the city and Increase frequency of buses and routes to ensure more of the population are facilitated.</p>	<p>with a key measure that benches are never more than 50-100 m from the network of spaces.</p> <p>With regards to the provision of public transport it must be noted that the Council is a facilitator of said service rather than a provider. It should also be noted that the licensing of such services is a matter for the NTA. Nonetheless, it is considered that the draft plan supports the provision of public transport and use of bus priority infrastructure through Policy Objective 4.3(9). The upgrade of bus stops infrastructure includes for new Bus Shelters at priority location is ongoing through the Bus Connects Galway Programme.</p> <p>Public Transport Policy 4.3(1) supports the implementation of Bus Connects Galway and the overall bus transport network which will include for a high frequency cross-city network of services and all associated infrastructural requirements, traffic management and priority arrangements.</p>
GLWC-C2-199 Shauna Spillane	<p>Designated Cycle path to link South Park towards Woodquay and New Pedestrian Bridge</p> <p>In line with 15-minute city initiative, designated cycle path should be built to link "South Park" by the Claddagh, up the river Corrib towards Woodquay and the new pedestrian bridge beside the cathedral. There is to implement this already along the canal walking trails, so why not capitalise on this for a greenway. This would help link Policy 8.8 on public realm by "establishing strong links between the city centre and regeneration areas of the Harbour, Ceannt Station and Headford Road and at Nuns Island".</p>	<p>CE Response</p> <p>This is included for in the GTS and in Chapter 4 of the draft plan on Fig 4.2 of the GTS- Proposed Cycle Network.</p>
GLWC-C2-171 Roselyn Carroll GLWC-C2-27 Grainne Faller	<p>Universal Access, Junction Review and Continuous Footways</p> <ul style="list-style-type: none"> • Address location of toucan posts for universal access and cargo bike users 	<p>CE Response</p> <p>Comments are noted. Improvements to universal access, junction improvements and continuous footpaths will make for better quality streets to support pedestrian and cyclists' activity</p>

	<ul style="list-style-type: none"> • Deliver junction design review in with global approach and deliver pedestrian and cycling facilities • Deliver continuous footways in established and new developments. • All paths should be wheelchair accessible. All pedestrian crossings should be raised. No beg buttons followed by waiting. Lights change when the pedestrian wants to cross. 	<p>and safety. Policy within the draft plan supports infrastructural improvements to reduce obstacles and improve accessibility in line the comments as listed in this submission.</p> <p>Text in Section 4.6 under the Accessibility heading of the draft plan states the following: The NTA's Permeability Best Practice Guide and DMURS also advocates for connectivity and accessibility improvements throughout the city, including new developments and retrofitting existing developments, where possible. The Council supports these concepts of needing to remove obstacles in the public realm, walking routes, and providing adaptations of greenways to promote accessibility for all. Allied to the design of the street network, the development of universal design to improve accessibility, in particular for people with reduced mobility, will be a critical element in any new street design or street improvement schemes.</p> <p>Additional relevant policies include:</p> <p>Sustainable neighbourhoods: Outer Suburbs Policy 3.4(8) encourage the promotion of universal design principles and lifetime adaptability in the design and layout of residential developments.</p> <p>Specific Objective 4.8(17) prioritises improvements to pedestrian movements and safety within the city centre including extension of pedestrianisation, provision of wider footpaths and shared streets</p> <p>City Centre Policy 10.1(7) maintain and enhance the quality of the city centre public realm and enhance accessibility and connectivity to and within the city centre through improvements to the network of streets, footpaths and public spaces and through implementation of the Public Realm Strategy.</p>
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GLWC-C2-228 Galway Environmental Network	<p>Emissions</p> <p>Include policies with the objective to significantly reduce car dependency in the city by 50%. The transport sector accounted for 20.3% of all carbon emissions in 2019, almost double that of the residential sector. Road transport accounted for 95% of transport emissions in 2019. Private cars account for 40% of transport final energy demand in 2018. Reducing private car use in the city by 50% would make a significant contribution towards achieving the 2030 target in the Climate Action Plan 2021.</p> <p>Facilitate and enable active travel modes, which will deliver health benefits by encouraging active lifestyles, improved air quality due to reductions in various pollutants including NOx and particulate matter, reductions in noise, traffic accidents and general well-being as well as environmental benefits. It is of great concern that the results from the air quality monitor located in Eyre Square, commissioned last January, have recorded daily average concentrations of nitrogen dioxide very significantly above the WHO 2021 Guidelines on most days.</p> <p>Facilitate the implementation of zero-emissions public transport, including a comprehensive network of electric buses and GLUAS, the very light rail system for Galway.</p>	<p>CE Response</p> <p>Policies in the plan are aimed to reduce car dependency. The plan supports the GTS, which includes for a range of measures that focus on an integrated and sustainable solution with a strong objective to reduce car dependency in favour of public transport and active modes.</p> <p>Refer to OPR response to observation 7 which will elaborate for monitoring including SEA.</p>
GLWC-C2-123 Owen Hanley	<p>Cycling and Walking provisions in Headford Rd Area</p> <p>Cycling and walking provision in this area of the city is one of the weakest in Galway. The Council should commit to a walkability and accessibility study of the area.</p> <p>There is an urgent need for a safe footpath on the main Headford Rd between Ballinfoile and Ballindooley Cross. Many</p>	<p>CE Response</p> <p>These comments are noted. The review of the GTS will include for a review of the walkability and accessibility of the entire GTS area to prioritise improvements in the walking network.</p>

	<p>people walk and cycle in and out this road now and it is extremely dangerous with no footpath and no wide margin on the road.</p>	<p>The plan supports footpath improvements as included for in specific objective 4.8(17) and text under the cycling heading which states the primary network focuses on the provision of segregated safe routes and connections from dedicated cycleways and footpaths to existing networks linking schools, workplaces and residential areas as alternatives to vehicular transport.</p> <p>It is an objective of the plan that a high standard of pedestrian infrastructure and permeability will be provided as part of future developments and projects.</p>
GLWC-C2-123 Owen Hanley	<p>Active Travel-Castlegar</p> <p>In Castlegar village itself the lack of basic pedestrian facilities is a stain on the Council's delivery as a local authority. The City Development Plan should commit to delivering a footpath along the City Boundary of the School Road in Castlegar Village, and such infrastructure pre-empt any other significant development in the area. Such measures could also be delivered in tandem with traffic calming to manage the deadly speeding on that road.</p>	<p>CE Response</p> <p>There is currently a Specific Objective to improve this road on the City Development Plan map.</p>
GLWC-C2-123 Owen Hanley	<p>Renmore- Galway to Athlone Greenway-Protect Right of Way along Railway Line</p> <p>The walkway that travels across Lough Atalia along the railway line is an important active travel link between Renmore and the city centre. But its current infrastructural condition is not up to standard. The right of way of the line should be protected in any development of Ceannt Station and the Line must urgently be upgraded, improved and widened. This can be done through the Galway to Athlone Greenway project if this is chosen as the preferred route.</p>	<p>CE Response</p> <p>The rail line will remain a public right of way. The Ceannt Station development will not compromise this public right of way. Appendix 5 of this plan includes for an inventory right of ways and this specific route is included in the inventory.</p> <p>The Greenway and public corridor is as per mapped.</p>

GLWC-C2-123 Owen Hanley	<p>Galway to Athlone Greenway</p>	<p>CE Response</p>
	<p>There is significant engagement from submissions in relation to the City Council's remit of the Galway to Athlone Greenway section that starts at the Coast Road and continues to the City Centre. I support the Greenway which will not only be positive for the region but be a strong cycling and walking link between the city centre, Renmore, Ballyloughane, Roscam and Oranmore. In principle off road infrastructure is preferable when designing greenways but given the urban nature of this route, directness for commuters is also important.</p> <p>This process is not best designed to adjudicate whether the route should be on road or off road, go around the Roscam Peninsula, through it or both. As such the Development Plan should allow flexibility, but the Council must be more proactive in engaging stakeholders and in delivering a design that is functional and beneficial to the local communities. The Council should begin planning for this route and participation by the local community on that process immediately.</p> <p>Notwithstanding the above, segregated cycling facilities are necessary on the Coast Road and should be developed in collaboration with Galway County Council.</p>	<p>Comments are noted. Refer to Greenway Response in Submission 32 and CE Recommendation in Chapter 5.</p>
GLWC-C2-123 Owen Hanley	<p>Mervue- Active Travel- Lough Atalia Barrier to Residents</p> <p>Lough Atalia Road remains a significant barrier to residents in Mervue and beyond using active travel modes of transport and requires interventions to encourage walking and cycling. The two-three car park spaces on Lough Atalia Road should be removed to widen the footpath to a standard width. A re-allocation of road space for cycling should be considered.</p>	<p>CE Response</p> <p>This is part of the GTS inner access route and will be a consideration of the design and upgrade of the Lough Atalia Road.</p>
GLWC-C2-123 Owen Hanley	<p>Ballybane More - footpath</p>	<p>CE Response</p>

	The provision of a footpath on Ballybane More Road should also be included as a short-term objective.	It is an objective of the plan that this road will be subject to improvements. Some stretches will be delivered in tandem with ongoing housing developments.
GLWC-C2-173 Galway Cycling Campaign	<p>Cycle Parking and the 15-Minute City</p> <p>Proposal: Add text to policy discussion in 4. Sustainable Mobility and Transportation which makes a clear link in between adequate cycle-parking and the adopted 15-minute city concept policy.</p> <p>Suggested amendment to add section 4.4 Sustainable Mobility - Walk and Cycle - Cycling, p101: Add: "Increased public cycle parking provision in the city centre and at other important destinations throughout the city will be key to ensuring that the policy of the 15-minute city concept is achievable."</p>	<p>CE Response</p> <p>Comments are noted. Text under the Cycling heading in the draft plan currently states that "Providing convenient cycle parking near bus stops and at key locations across the city, including at education locations, transport hubs, employment areas, commercial and community hubs and where appropriate in residential areas. This will be essential to the success of the network and needed to encourage the uptake in cycling. This was recognized in the recent 2021 NTA investment to support Parkmore Improvement works for cycling and infrastructure at this high employment area as identified in the Parkmore Area Strategic Transport Framework, 2019. Planning policy and development management standards will support the necessary integration of the cycling network and infrastructure into existing and planned developments. Where local area based transport solutions are required for areas of high employment, educational areas, or other high traffic areas, these will be supported also, subject to normal development management assessment".</p> <p>Delivery of cycle parking in ongoing through transport work programme.</p>
GLWC-C2-173 Galway Cycling Campaign GLWC-C2-82 Aran Murray	<p>Cycling and one-way streets</p> <p>Proposal: To add policy items and amend text in 4. Sustainable Mobility and Transportation which makes provision for better cycling access on one-way streets. Proposed amendment to add new text to 4.4 Sustainable Mobility - Walk and Cycle, p. 103:</p> <p>Add: Galway City Council will further support Public Bike Share by implementing the recommendations of the 2011 Jacobs</p>	<p>CE Response</p> <p>2 Way cycle on one-way streets is not legitimate unless segregated. The current policy is to avoid one-way systems. Option would be assessed on a case-by-case bases at project stage.</p> <p>The Jacobs report [commissioned by GCC circa 2007/2008] has been superseded by GTS in 2016.</p>

	<p>Report Public Bike Schemes in Regional Cities through the provision of two-way cycling on one-way streets, and by opening up pedestrianised areas to cycling where conditions allow.</p> <p>Proposed amendment to add new policy to 4.4 Sustainable Mobility - Walk and Cycle, p. 104:</p> <ul style="list-style-type: none"> From: "11. Promote and facilitate the development of Public Bike/other share schemes across the city." To: "11. Promote and facilitate the development of Public Bike/other share schemes across the city. Implement the recommendations of the Jacobs Report (2011) by implementing two-way access to cyclists on one-way streets. 	
GLWC-C2-173 Galway Cycling Campaign	<p>Addressing hostile road designs</p> <p>Proposal: Add two new bullet-points relating to road design as a factor in the safety (actual and perceived) and convenience of cycling and by consequence the uptake and growth of cycling as a mode of transport.</p> <p>Proposed addition to text in 4.4 Sustainable Mobility Walk and Cycle, p. 99:</p> <p>Add: "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.</p> <p>The Council acknowledges that the use of narrow traffic lanes on main roads has the effect of creating hostile conditions for cycling and removing road capacity from cyclists. The council</p>	<p>CE Response</p> <p>Comments are noted. DMURS and the GTS support these concerns with a view to identifying remedial works to improve cycling routes and creating safer road design for pedestrians and cyclists. The review of cycle ways and routes will form part of the forthcoming GTS review.</p>

	<p>recognises narrowing schemes as hostile features that are identified as requiring audits in the National Cycle Policy Framework. The use of narrow traffic lanes is in direct conflict with the National Cycle Policy Framework Objective 2.9 stipulation that designs should have a principal aim of allowing cyclists to maintain momentum. Where feasible, the council will identify remedial works for places where narrow traffic lanes are found in the city.”</p>	
GLWC-C2-173 Galway Cycling Campaign	<p>Level of service for walking as a form of transport in Galway</p> <p>Proposal: Add new text relating to road design as a factor in the safety (actual and perceived) and convenience of cycling and by consequence the uptake and growth of cycling as a mode of transport.</p> <p>Proposed addition to text in 4.4 Sustainable Mobility Walk and Cycle, p. 101: Add:</p> <p>“In support of the 15-minute city proposals, 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.</p> <p>Maximum periods 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”</p>	<p>CE Response</p> <p>Comments are noted. These level of service comments relate to specific project design or road design which are outside the scope of the development plan review. It should however be noted that Road and Street Network and Accessibility Policy 4.6 in Chapter 4 includes policy support for road design improvements and safety through the implementation of best practices as set out in DMURS. These policies in addition to the implementation of GTS measures will help to further support active travel and the concept of the 15-minute city.</p>

<p>GLWC-C2-156 Lidl Ireland GMBH</p>	<p>Sustainable Transport and a Walkable / 15 Minute City & Retail Hierarchy</p>	<p>CE Response</p>
<p>GLWC-C2-228 Galway Environmental Network</p>	<p>The Draft Development Plan makes substantial reference to sustainable and/or public transport, a 15 minute city, servicing neighbourhood needs, etc. The zoning / specific / regeneration objectives and the Retail Hierarchy do not however align with same, with limitations arising.</p> <p>The draft plan states for instance:</p> <p>“Neighbourhood Centres are identified as location for daily top up shopping, which can be accessed easily within neighbourhoods. At the lowest tiers, provision is made to facilitate local shops preferably clustered with other neighbourhood services /amenities.</p> <p>The transport strategy for the city includes plans for high frequency bus routes that can access the existing and planned District Centres. The roll out of investment in the network of infrastructure to increase sustainable mobility will further improve links to District and Neighbourhood Centres, combined with measures to improve permeability. Encouraging and protecting provision at the lower tiers will also support the concept of a '15-minute city' where the daily needs of communities can be accessed within a 15 minute walk, cycle or by public transport.</p> <p>Local facilities bring residents together and reduce the need for traffic movements.</p> <p>There are a choice of actions which can be activated to effect travel demand patterns, the suitability of which depend on the area. These include:</p> <ul style="list-style-type: none"> • Increase in travel by alternative modes -this includes measures to encourage public transport use, walking and cycling in preference to car use • Offering alternative destinations - to encourage travel to 	<p>The submission notes that general policy in Chapter 6, policy 6.1(13) facilitates the development of the designated District, Neighbourhood and Local centres at a scale appropriate to serve the associated catchment areas while encouraging low carbon trip patterns and contributing to achieving the benefits of the “15 minute neighbourhood concept”. The existing retail hierarchy under District, Neighbourhood and Local Centres, Retail Hierarchy Policy 6.12(7), also supports the 15 Minute City concept.</p> <p>GTS supports provision of sustainable mobility network Ch. 3 supports alignment of services and amenities with land use and transportation.</p> <p>Residential zoning allows for the provision local services and Regeneration allows mixed use. It is considered that the policy objective in the draft plan, framed by the Core Strategy and compact growth facilitates the transition to the achievement of the 15 minute city.</p>

	<p>destinations that are closer, and that lead to less overall congestion</p> <ul style="list-style-type: none"> • Reduction in trip length - by planning for the provision of employment, retail and other services close to where people live <p>Policy 6.1 General policy (13) Facilitate the development of the designated District, Neighbourhood and Local centres at a scale appropriate to serve the associated catchment areas while encouraging low carbon trip patterns and contributing to achieving the benefits of the "15-minute neighbourhood concept" is referenced.</p> <p>Neighbourhood centres perform important functions in supporting communities as they are normally very accessible. They provide for 'top up shopping' for the immediate catchment and in addition to providing a service they also play a broader role in fostering community spirit.</p> <p>Regeneration and Opportunity Sites designations in some respects undermine or restrict the ability of such sites to provide the 'walkable services' to the residential catchments.</p> <p>A greater balance between prioritising the provision of services and the provision of housing is therefore required in our opinion.</p> <p>All developments must be within a 400m walking distance, not a radius, of a bus stop from the furthest unit in the development. No development to get planning permission without there being proven public transport capacity (as in would be the case with waste water treatment).</p>	
GLWC-C2-127 Roselyn Carroll	<p>Cycle Route from Bodkin Junction along the Headford Road</p> <p>Galway City Council transport plan lacks a primary cycle route that accesses the city from Bodkin Junction along the Headford</p>	<p>CE Response</p> <p>GTS includes for a cycle route along the Headford road to the Bothar on Choiste junction as part of the cycle network.</p>

	Road. There is space for the provision of a segregated cycle route in the redevelopment of the Headford Road Regeneration Plan (Section 10.7). Greater priority and value should be given to road space and land to the provision of a segregated cycle network that will safely deliver families, children to school, all mobilities etc from Headford Road, Ballinfoile, Castlegar, Mervue, Renmore etc into Wood quay and beyond.	
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4.5 - Transport Demand Management Measures

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-38 Transport Infrastructure Ireland	<p>TII-Employment Development and Sustainable Travel Integration</p> <p>There is a need for ensuring appropriate transport demand measures associated with large outer edge zonings, especially employment zonings by review of Section 4.5 Transport Demand Management Measures. The requirement to address these issues should go beyond the application of development management standards such as mobility management and travel plans and also assist in delivering on point 6 of Policy 6.5 Enterprise and Innovation and the protection of the capacity and efficiency of the national roads network.</p> <p>A revised approach is also needed to reflect and address in the amended requirements for Transport Demand Management in Section 11.9 and 11.10 for employment land uses with respect to development standards.</p>	<p>CE Response</p> <p>In combination with Chapter 11, the development plan transport strategy has been framed to align land use and transportation and is synchronized with land use zoning. Specific planning applications are subject to assessment as part of Development Management process. Implementation of the GTS, including the N6 GCRR provides for a direct access to Parkmore. Facilities are being further enhanced by the Parkmore Area Strategic Transport Framework.</p> <p>Revised approach will be considered with amended text added to section 11.10.3 in Chapter 11 as per recommendation to include requirement for ABTA and TTAs.</p> <p>CE Recommendation</p> <p>Proposed Amendment to include a fourth paragraph under Section 11.10.3 Travel Plans to include text in green</p> <p>Complementary measures such as Area Based Transport Assessments (ABTA) and Traffic and Transport Assessments (TTA) are required for Local Area Plans (LAP's) and can also be considered on Masterplans and Framework Plans, where the scale of development determines the need for integrated land use and transport planning policies. A Traffic and Transport Assessment is a</p>

		<p>comprehensive review of all the potential transport impacts of a proposed development or re-development, with an agreed plan to mitigate any adverse consequences and should be carried out in accordance with Traffic & Transport Assessment Guidelines PE-PDV-02045 May 2014. The preparation of ABTAs, includes for an assessment process focused on understanding transport needs and land use integration, used in the preparation of Local Area Plans, planning schemes and masterplans and shall be carried out in accordance with Area Based Transport Assessment (ABTA) Guidance Notes PE-PDV-02046 April 2018 and supplementary ABTA How to Guide, Guidance Document, Pilot Methodology (2021). There shall also be a requirement for the principles of DMURS to be applied to Local Area Plans, Masterplans and Framework Plans taking into account street design based on the street classification and measures for cyclist and pedestrians to promote placemaking as set out in Section 11.3.1 (b) of the plan.</p>
GLWC-C2-212 Galway Commuter Coalition	Car Parking There should be a reduction in parking available for cars with a provision for inclusive and well-designed bike parking at all amenities and public buildings. Park and rides should be in operation throughout the year.	CE Response Policy in the plan supports reduction of parking in line with National Policy. Reducing on street car parking is included for in tandem with projects being implemented in the GTS alongside with public transport improvements. Bike parking and standards are addressed in Sections 11.3.1 (h) and 11.10.4 of the draft plan.
GLWC-C2-228 Galway Environmental Network	Greater collaboration is needed between City and County Councils to ensure an effective transition from car dependency. Include policies to reduce the provision of on-street parking. Include policies to reduce the existing provision of surface and multi-storey parking in the city.	NTA has commissioned a feasibility study for Park & Rides. Policy 4.3 Public Transport (4) prioritises the provision of park and ride facilities at appropriate locations so that they align with the bus network and cross- city link route to create the necessary modal shift to reduce car dependency.
GLWC-C2-27 Grainne Faller	Exclude minimum car parking provisions for new developments / allow for a zero parking provision in exchange for enhanced public open space, cycle and pedestrian infrastructure, or contributions to public transport investment.	GTS is a collaborative strategy with the County which includes for a 20-year plan to reduce car dependency. Car parking provision is aligned to national standards and provides for a reduction in car parking provision in tandem with the role out of public transportation, active travel improvements and transport corridors.

	<p>Set objectives to redistribute remaining parking stock in the city in a manner that avoids private cars driving through the city centre or crossing the River Corrib to seek parking. i.e redistributed car parking around a cordon accessible from the East, West and North.</p> <p>Enforce car parking rules</p>	<p>The cross-city link will reduce car traffic through the city once implemented. Park and Rides on the approach roads into the city at peripheral locations as set out in the GTS will also address this issue.</p> <p>Enforcement issue. Outside remit of the plan.</p>
GLWC-C2-150 Angela Casey	Parking- Requirements of Existing Users The development plan needs to consider parking requirements of existing users. It is detrimental to the overall objectives in the draft plan that the city council grants planning permission for residential developments in the inner-city area without requiring car-parking spaces to be provided. The same city council then grants permits to occupiers of these new developments permitting on-street parking without calculating in an objective manner the capacity of the existing residential areas to assimilate the additional car-parking requirements.	CE Response Residential parking is subject to a permit system as part of the street parking program and controlled though the Transport Section.
GLWC-C2-184 Valerie Walsh		
GLWC-C2-234 Anne & Pat O'Toole		The parking policy set out in draft development plan is to accord with national policy. The NPF direction is for reduced car parking with maximum standard as part overall demand management. The draft plan accords with this approach.
GLWC-C2-232 Munster Avenue Residents Association	<p>The car-parking provisions at sections 11.3.3 (Inner Residential Areas) and 11.3.4 (City Centre Residential Areas) reduced, or no car parking, is available for residential developments. A specific provision should be included to state that permits for on-street parking will not be available for such developments, and this provision included as a condition of use of the planning permission.</p> <p>Aspirations in the Development Plan to reduce on-street parking will be detrimental to the sustainability of the existing inner and city centre neighbourhoods. The draft plan should contain specific provisions and development management standards for replacement of existing on-street car parking spaces, and requiring identifiable designated car-parking where new developments are permitted which have reduced or no car-parking capacity.</p>	<p>Parking standards are set out in Chapter 11 under the relevant neighbourhood area, Sections 11.3.1 (g) Outer Suburbs, 11.3.2 (c) (Established suburbs), 11.3.3 (a) Inner Residential Area, 11.4 City Centre</p>

	<p>At page 106 reference is made to varying standards for car parking between the four defined neighbourhood areas. These varying standards are not set out in the plan. In the absence of specific information on the standards, residents are unaware of the plans for their areas and cannot make informed submissions.</p>	
GLWC-C2-150 Angela Casey GLWC-C2-184 Valerie Walsh GLWC-C2-234 Anne & Pat O'Toole GLWC-C2-232 Munster Avenue Residents Association	<p>Traffic Congestion</p> <p>The draft plan recognises the problems from traffic congestion. Munster Avenue is primarily a residential area, with traffic congestion arising from over-use of pay and display on-street parking, over-granting of residential traffic parking permits to non-residents of the Avenue, poor traffic flow because the Avenue cannot accommodate two-way traffic, inadequate parking facilities for two commercial development in the Avenue, the gym and funeral parlour, and the use of the Avenue for temporary parking when dropping aid collecting children from nearby schools</p>	<p>CE Response</p> <p>Residential parking as noted above is subject to a permit system as part of the street parking program. The concerns regarding poor traffic flow and parking issues are acknowledged, but would be considered operational issues for Transport, rather than coming within the scope of the development plan.</p>
GLWC-C2-144 Innovation Technology AtlanTec Gateway (itag) GLWC-C2-171 Roselyn Carroll	<p>Parking Policy and Smart Technology</p> <p>itag supports the concept of the 15min City and increasing the availability and utility of Public Transport, but continued car use to access the city and the surrounding areas, incl. places of work, is inevitable. It is thus essential that adequate and efficient car parking be provided throughout the city and as part of the development and commercial areas (page 313).</p> <p>Review parking policy and strengthen policy and resources.</p>	<p>CE Response</p> <p>Comments are noted. The draft plan provides that in the city centre area where the GTS includes for significant investment in sustainable modes and where the most strategic Regeneration and Opportunity Sites are located, the requirements for car parking will be linked to performance based outcomes. Exceptions to this include the large designated regeneration lands at Ceannt where there is an objective for the provision of a car park that can support the transportation hub and a substantial level of mixed-use development constituting an extension to the city centre. In addition, a replacement of the existing surface car park on the Dyke Road is accepted on lands included in the Headford Road Regeneration area where re -development accommodating the car parking in a multi-story format would enable more efficient use of the land. Notwithstanding this approach all developments will be subject to the standard traffic and transport assessments.</p>

	<p>Introduce smart technology for users. One opportunity not mentioned in the report is the adoption of Smart Parking as part of a Smart City strategy. This could provide an aggregated view of public and private city parking availability to allow car users to make informed decisions about where to park and whether to drive or utilise alternative transportation means. It would also be a very beneficial service to the tourist industry, making it easier for visitors to navigate and park in the city. The data provided by such a system will also be extremely valuable for city planning and can be further used for example for demand-based parking pricing to further control and influence city centre traffic.</p>	<p>The draft plan and the GTS makes provision for smart technologies as part of transport demand management measures. Specific Objective 4.8(21) supports the expansion and use of mobility management and smart technologies in conjunction with service providers and the NTA. This would allow for the consideration of smart technologies over the lifetime of the plan. These measures will also form part of the upcoming GTS review.</p>
GLWC-C2-127 Roselyn Carroll	<p>Dyke Road</p> <p>Road classification and road function of the Dyke Road needs urgent attention as it is planned to be one of two roads that can provide access (Post busconnects) to the planned multistorey carpark in the Dyke Road. At present it primarily serves to channel traffic from the Headford Road, Menlo Road and Coolough Road into the city. Priority needs to be rebalanced back to pedestrians and cyclists on this route and the entire route must become 30km/hr from the T-junction of Coolough and Dyke to Wood Quay. The Dyke Road should be designated Local access only. A dedicated traffic management, filtering, speed reduction and redesign of the street environment is required to protect this route and ensure it becomes a world-class amenity for Galway City.</p>	<p>CE Response</p> <p>This is an operational issue outside the scope of the development plan. Specific Objective 5.10(31) in Chapter 5 supports the development of a greenway along the Dyke Road embankment and includes for:</p> <ul style="list-style-type: none"> • Riverside walk from the Dyke Road to NUIG lands on the opposite side of the River Corrib via the proposed Clifden Railway Pedestrian and Cycle Bridge with funding provided under the URDF Call 2. • Riverside walk along the eastern side of the River Corrib from the Dyke Road to the pier at Menlough. A deviation from the route indicated on the development plan map may be permitted, any alternative alignments shall maximise amenity benefits. • Riverside Walk along the northern side of the Terryland/Sandy River from the Dyke Road to the point where it disappears underground at Glenanail to the rear of Glenburren Park

	<p>A high quality continuous footway must be delivered along the Dyke road immediately. Current plans and conditions do not attempt to address the many issues with this road for pedestrians, cyclists, local residents, students and children. Traffic filtering is required immediately.</p> <p>RA Greenway route from old railway embankment Dyke Road to Woodquay.</p>	
GLWC-C2-182 Reform, Central Policy and Communications Division - Dept. of Transport	<p>Reducing air, noise pollution</p> <p>The DOT suggest to give further consideration to the role of demand management measures in achieving reductions in noise pollution, air pollution, CO2 emissions, and improving health through active travel and safe street.</p>	<p>CE Response</p> <p>Comments are noted. It is considered that the issues raised are an objective of transport demand management measures and pollution will be reduced in line with increased demand management measures.</p>
GLWC-C2-141 National Transport Agency	<p>Parking</p> <p>The NTA state that appropriate densities and parking standards should be linked to the availability of public transport and active travel infrastructure such as bicycle lanes.</p> <p>Areas which are within walking distance to public transport services should have a presumption for higher densities and lower car parking standards in order to promote the sustainable development of the city.</p> <p>Submission recommends that there should be no differentiation between Outer and Established Suburbs in relation to car parking provision, but rather that car parking provision should be related to the availability of public transport and active travel infrastructure which is being or will be provided in accordance with the GTS (or GTS as reviewed).</p> <p>The NTA recommend to remove wording in section 11.3.1 (g) Car Parking Standards which states that group car-</p>	<p>CE Response</p> <p>Wording noted within Section 11.3.1(g) which states "<i>Group car-parking spaces shall not be allocated to individual residential units.</i>" relates to the assignment of designated group parking spaces to individual residential units by property developers and/or property management companies. The intention of this section is to prohibit designated (assigned) usage of group parking by individual / groups of residential developments to ensure parking is provided for all inhabitants and visitors of developments and affords usage on a flexible basis.</p> <p>CE Recommendation</p> <p>Amend wording in Section 11.3.1(g) to add text in green</p> <p><i>"Group car-parking spaces shall not be allocated to individual residential units within residential developments and such grouped car-parking spaces shall be made available for all inhabitants/ visitors of the development."</i></p>

	<p>parking spaces shall not be allocated to individual residential units as it is considered that the allocation of grouped parking is an appropriate measure to encourage less reliance on the private car and provide safer and more people and in particular child-friendly spaces directly outside dwellings. Where developments offer group parking the overall quantum of parking provided is reduced.</p>	
GLWC-C2-141 National Transport Agency	<p>School Drop-off Facilities</p> <p>The NTA advise that there should be a presumption against the provision of school drop-off facilities and recommend to amend the requirement for drop-off facilities in accordance with the NTA's Safe Routes to School guidance, in order to promote sustainable forms of transport and promote the use of Park and Stride locations as a suitable alternative. (Table 11.6 Parking Space Requirement for Different Types of Development: Maximum Standards).</p>	<p>CE Response</p> <p>Comments noted and agreed with. It is acknowledged that school traffic is a factor in the city's congestion, but school bus services are controlled by the Dept. of Education.</p> <p>Drop-off facilities should be in accordance with the NTA's Safe Routes to School guidance. Active Travel initiatives such as park and stride, safe routes to school etc. support sustainable mobility.</p>
GLWC-C2-144 Innovation Technology AtlanTec Gateway (itag)	<p>It is also felt that school transportation, incl. lack of school busses (public & private) and school drop-offs, are significant contributors to the city's traffic challenges and are not adequately addressed in the plan</p>	
GLWC-C2-144 Innovation Technology AtlanTec Gateway (itag)	<p>Congestion problems- lack of School Buses & School Drop-Offs- Not addressed in Plan</p> <p>More needs to be done to urgently address the traffic and commuting challenges in Galway city. Despite the existing sectoral policy documents (page 91) which were published in 2009 - Smarter Travel - A Sustainable Transport Future 2009-2020 and the National Cycle Policy Framework, Galway's traffic and congestion problems have worsened during this period and there has been limited improvement in Public Transport. Hence it is strongly encouraged that a</p>	<p>CE Response</p> <p>The GTS plan includes for a series of measures to be implemented over a 20-year period to address the traffic and commuting challenges in the city, public transportation and active travel. A review of the GTS is due to commence in 2022 which will look at all aspects of the GTS. Policy at a national level has also emerged since the draft plan, Sustainable Mobility Policy replaced Smarter Travel - A Sustainable Transport Future 2009-2020.</p>

	comprehensive assessment be conducted of this policy framework with a view to determining a more effective set of policies moving forward.	
GLWC-C2-176 Kevin Jennings	Goods Vehicle Management (HGVs) There should be no need for heavy goods vehicles (HGVs) inside the city administrative boundaries. Identify some park and ride sites off the trunk road network with Last Mile Delivery depots so that vans could replace heavy good vehicles and cargo bikes could replace van. Include policy under Policy 4.5 to ban HGVs on certain roads in the city. Develop a map and introduce HGV bans together with the HGV management plan.	CE Response HGV management is part of the Cross City Link proposal. An application will need to be submitted to ABP with a decision then expected in Q3 of 2022. This will include a HGV management plan. It would be an operational matter to ban HGVs and would require specific bye-law control.
GLWC-C2-127 Roselyn Carroll		

4.6 - Road and Street Network

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-27 Grainne Faller	Speed Limit 30Kph speed limit and traffic calming right across the city.	CE Response: Comments are Noted. Speed limit falls outside the remit of the plan. These require bye-laws implementation in conjunction with statutory consultees. However, there is policy support in the draft plan under Road and Street Network and Accessibility Policy 4.6(6) to support reduced speed limits in the city centre and residential areas of the city.
GLWC-C2-127 Roselyn Carroll	Define, by way of map, a directory of road classification and road function interactive map. Such a map would be useful to all transport bodies/authorities, elected representatives, stakeholder and other groups can use – as per Guidelines for Setting and Managing Speed Limits). Will also aid identification of safe/enjoyable walking routes.	The creation of an interactive road classification and function map falls outside the scope of the development plan.

GLWC-C2-42 OPW	<p>OPW- Construction, Replacement or Alteration of Bridges and Culverts over Watercourses</p> <p>Section 4.6 of the written statement refers to the strategic orbital route, the N6 GCRR incorporating a new river crossing, and section 4.8 specific objectives 14 and 15 and 16 state: “Provide a pedestrian and cycle bridge crossing of the River Corrib adjacent to the Salmon Weir Bridge”, “Provide a new pedestrian and cycle bridge on the piers of the Old Clifden Railway Line from the Headford Road Regeneration area to NUIG campus” and “Investigate the potential for the construction of a new pedestrian bridge from Gaol Road to Newtownsmyth” respectively.</p> <p>It should be noted that there are restrictions on the construction, replacement or alteration of bridges and culverts over any watercourse, and that appropriate consent from the Commissioners is required under Section 50 of the Arterial Drainage Act 1945.</p>	<p>CE Response:</p> <p>Comments are noted. OPW will be statutory consultee on project design.</p>
GLWC-C2-148 Galway City Community Network	<p>Policy 4.6 Road and Street Network and Accessibility</p> <p>GCCN requests that the following be added under Policy 4.6 Road and Street Network and Accessibility</p>	<p>CE Response</p> <p>Road and Street Network and Accessibility Policy 4.6.4 is proposed to be amended to include for all users as proposed: Implement improvements on the general road network, including new links and junction revisions where needed in the interest of safety and convenience for all users.</p>
GLWC-C2-127 Roselyn Carroll	<p>The Council will include Universal Design as a core component of Transport and Sustainable Mobility with clear actions illustrating how the principle of Universal Design will be applied in transport infrastructure as per Ireland’s obligations to the UN Convention on the Rights of Persons with Disabilities and Barcelona declaration.</p> <p>The Council will carry out regular audits, in partnership with disability organisations, in the public realm and civic spaces, including an audit of the accessibility of current transport infrastructure to include both the city centre and suburbs</p>	<p>There is a specific objective in Chapter 8 under Specific Objective 8.10 (15) to carry out an audit of existing street furniture poles and signage in the public realm, with the aim of removing redundant elements.</p> <p>Standard criteria associated with all projects.</p> <p>Comments are noted. The Jacobs report has been superseded by the GTS. Transport Department has indicated that two way cycling on a one way street is</p>

	<p>based on the principles of universal design.</p> <p>The Council will review proposed active travel infrastructure designs to ensure routes are safe, direct, coherent, attractive and comfortable.</p> <p>The Council will maximise permeability and ensure connectivity of active travel infrastructure in accordance with national policy by including contra flow cycle lanes on one-way streets as recommended in the Jacobs Report (2011) and included in a previous development plan ("Implement two-way access to cyclists on one-way streets where feasible" from Cycling section of City Development Plan 2011 – 2017, Page 35)</p> <p>Include reference to pedestrians, disability users, and cyclists in Policy 4.6.4.</p> <p>Include new policy in Policy 4.6 to support user hierarchy model (DMURS Figure 2.21) that promotes and prioritises sustainable forms of transportation.</p>	<p>not legislated for and it is therefore not supported or included for in the draft plan.</p> <p>Comments noted. Amend Policy 4.4(6) which supports all users.</p> <p>Policy 4.6 (5) of the draft plan requires to "Implement best practice in road and street design for all users as set out in the Design Manual for Urban Roads and Streets (2013) as updated (2019) which includes for support of the user hierarchy model.</p> <p>CE Recommendation</p> <p>Amend Policy 4.6(4) to include text in green</p> <p>Implement improvements on the general road network, including new links and junction revisions where needed in the interest of safety and convenience for all users. (Same Recommendation for Submission 173)</p> <p>Amend Road and Street Network and Accessibility Policy 4.6(5) Implement best practice in road and street design for all users as set out in the Design Manual for Urban Roads and Streets (2013) as updated (2019) and (2020).</p>
GLWC-C2- 212 Galway Commuter Coalition	N6 GCCR- Against The Ring Road N6 should not be considered within the remit of sustainable travel and will not lend way in making Galway a pillar of active travel. We need reduced dependency on private cars	CE Response: Comments are Noted. The N6 GCCR is critical to the delivery of the GTS as it will facilitate removal of traffic on city street that can be rededicated to buses and bike.
GLWC-C2- 153 People Before Profit Galway	Text Amendments to Road and Street Network PAGE 112 (Page 110 in actual plan), under Accessibility: With Ireland's ratification of the UNCRPD in 2018 and as a signatory to the Barcelona Declaration in 1995, Galway City Council is committed to promoting	CE Response: Comments are Noted. See Chapter 1 amendment which includes for the UNCRPD to be included into the Strategic Framework. No additional text needed.

GLWC-C2- 180 Access for All	<p>universal design and access for all. Public transport should be a key aspect in the delivery of this and requires a 'whole journey approach'. This refers to all elements that constitute a journey from the starting point to final destination to ensure universal design practices are being implemented throughout the journey. It is an objective of the GTS to foster and sustain an inclusive approach to the operation of the transport network, and all of its constituent travel modes. Network proposals, including both new proposals and the improvement of existing facilities will be undertaken in a manner that fully considers the accessibility requirements of all prospective users. This plan endorses the National Disability Inclusion Strategy (NDIS) 2017-2021 and ratification by Ireland in 2018 of the UNCRPD (Article 9) for inclusion to support accessibility to all vulnerable road users ... regardless of age, size, ability or disability.</p> <p>PAGE 113 (Page 111 in actual plan), under Policy 4.6 Road and Street Network and Accessibility</p> <p>7. Promote accessibility for people with disabilities and people with reduced mobility and have regard to best practice guidance from the National Disability Authority (NDA) and in accordance with the UNCRPD.</p>	
GLWC-C2- 118 Ibec	<p>Road Infrastructure</p> <p>It is critical for Galway that strategic road projects as identified in the NPF, NDP, RSES and MASP are prioritised. These projects complete strategic links to enhance our international and regional connectivity between economic drivers of growth, especially between cities and ports. These projects are integral infrastructure for sustainable multi-modal transport. Inadequate road infrastructure and insufficient capacity, risks undermining the region's livability and hence the ability of the region to attract and retain staff and compete</p>	<p>CE Response</p> <p>These Strategic Road projects are priorities through the GTS. Importance for regional connectivity is recognized for NPF and RSES priorities.</p>

	<p>for investment. Commuting and accessibility impact considerably on quality of life.</p> <p>The Development Plan must support the accelerated delivery of the N6 Galway City Ring Road. The proposed N6 GCRR will provide additional accessibility and connectivity and facilitate public and sustainable transport. The delivery of the project will be a key growth enabler for the city.</p> <p>The Atlantic Corridor is the key to balancing future development on the Island, which would benefit all regions - attracting investment, supporting job creation and contributing to an improved quality of life. The combined potential of the regions is key in creating a counterbalance to Dublin and achieving balanced regional development. It will be a major growth enabler for Galway City. Quality is a key component of any analysis of our built environment. Galway City Council must continue to improve road connectivity and road quality locally.</p>	<p>Multiple objectives in the plan support delivery of the N6. Currently under Judicial Review.</p> <p>Comments are noted and reference is made in the GTS and in Chapters 4 and Chapter 6 highlighting the strategic and economic importance of the Atlantic Economic Corridor in accordance with the RSES. GCC acknowledges in the draft plan that the social, economic and environmental wellbeing of Galway City and the Northern and Western Region is dependent on transport and infrastructure investment in order to improve accessibility and connectivity to the County.</p>
GLWC-C2-173 Galway Cycling Campaign	<p>Junction redesign proposal</p> <p>Proposal: Amend policy item in relating to junction improvements to prioritise sustainable modes and provide a design according to the hierarchy of road users.</p> <p>Proposed amendment to policy item in 4.6 Road and Street Network and Accessibility, p. 111:</p> <p>From: “4. Implement improvements on the general road network, including new links and junction revisions where needed in the interest of safety and convenience.”</p> <p>To: “4. Implement improvements on the general road network, including new links and junction revisions where needed in the interest of safety and convenience, prioritising sustainable modes and according to the hierarchy of road users.”</p>	<p>CE Response: Comments are Noted.</p> <p>CE Recommendation Amend Policy 4.6(4) to include text in green Implement improvements on the general road network, including new links and junction revisions where needed in the interest of safety and convenience for all users.</p>

GLWC-C2-127 Roselyn Carroll	<p>Transition Zones</p> <p>Address the Transition Zones in line with new policy from TII. Apply specifically to N84</p>	<p>CE Response:</p> <p>Comments are Noted. N84 as referenced relates to traffic calming. This specific road as referenced would be dealt with through design standards and DMURS, rather than the development plan and is under the control of TII, the route being a national route.</p>
GLWC-C2-69 Galway County Council	<p>N6GCRR - Galway Co.Co</p> <p>Galway County Council similarly support the N6GCRR in their draft plan and will engage with the City Council in elements of the GTS which are of interest to the County.</p>	<p>CE Response:</p> <p>Comments are Noted. Galway City Council welcomes support of Galway County Council.</p>

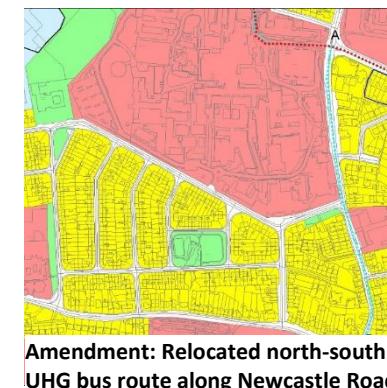
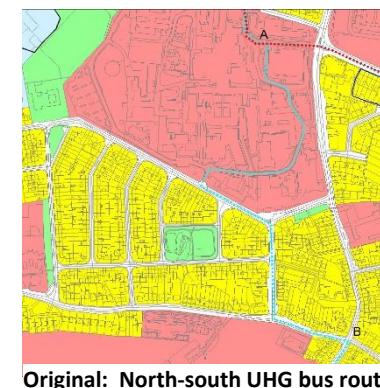
4.7 - Galway Port

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-121 Galway Harbour Company	<p>Diversification of port activities to include the renewable energy sector and offshore wind energy</p> <p>The future role of the port is transitioning towards the renewable energy sector in line with our climate change obligations and servicing of offshore energy operations is likely to become a much greater part of the port's role in the future. In line with this, we ask that the Council include specific reference in the first chapter of Section 4.7 to the diversification of port activities, with particular regard to both the renewable energy sector and offshore wind energy opportunities and the future role they will play in port activities, as the role of fossil fuels become less significant over time.</p> <p>The port is strategically located to service offshore energy operations off the west coast while the port</p>	<p>CE Response</p> <p>The diversification of port activities is acknowledged. References included in Ch.6 and text is proposed to be further strengthened in the first paragraph section 4.7. Galway Port (p.112 of draft plan) to include specific reference to the diversification of port activities.</p> <p>CE Recommendation</p> <p>Amend text in the first paragraph in Section 4.7 Galway Port to include text in green</p> <p>Galway Port is an important transport facility. It also acts as an important strategic regional hub for petroleum importation, storage and distribution and it serves the tourism industry as it is an important ferry port for passengers to the Aran Islands. An application for a significant 27-hectare expansion of the Port is currently at government level being accessed to determine if the compensatory measures would be sufficient to ensure the integrity of the Special Area of</p>

	<p>extension will provide for Galway Port playing a much greater role in supporting this sector in the future.</p>	<p>Conservation (SAC). If approved, this will give significant potential to diversify port activities, with particular regard to both the renewable energy sector and offshore wind energy opportunities. The establishment of land based infrastructure to service offshore energy will enable Galway Port to play a much greater role in supporting this sector in the future, which will become increasingly important to the region, as the role of fossil fuels become less significant over time.</p>
GLWC-C2-211 SSE plc	<p>Hydrogen Infrastructure development at the Port & Amendment to Policy 4.8.1</p> <p>Ensure the potential of the Port of Galway is realised as a key location for hydrogen infrastructure development by adding an explicit commitment to facilitate the development of infrastructure at the Port of Galway for the production, storage, and distribution of clean or green hydrogen.</p> <p>Alter the text of policy 4.8.1 to incorporate an explicit reference to hydrogen infrastructure: 'Support the development of low emission fuel infrastructure and associated technologies, such as those associated with hydrogen production, storage and transmission.</p>	<p>CE Response</p> <p>The diversification of port activities is acknowledged. References are included in Chapter 6 and text will be further strengthened in Section 4.7 Galway Port and Policy 4.8 Low Emission Infrastructure in Chapter 4 to support green hydrogen infrastructure. Policy 4.8.(1) Low Emissions Infrastructure provides support for the development of low emission fuel infrastructure and associated technologies</p> <p>CE Recommendation</p> <p>Include text to support hydrogen hub at the port in Section 4.7 Galway Port (p112) as per recommendation under See Submission 121 Response and Recommendation.</p>
GLWC-C2-118 Ibec	<p>Port Infrastructure Vital for Marine Renewable Sector</p> <p>Port infrastructure will be vital in supporting the marine renewable sector. As this sector evolves, supporting land-based infrastructure such as ports will play a key role in linking marine renewable energy developments to the National Grid. Offshore wind energy will contribute to a low carbon economy and generate employment. The wind resource of the west coast represents a huge natural resource and a major economic opportunity for the Atlantic seaboard.</p>	<p>CE Response</p> <p>Noted. There is support in Policy 6.9 Marine Sector and Renewable Energy of the Economy, Enterprise and Retail Chapter. It is accepted that more support is needed in Chapter 4 for port infrastructure and in particular supporting land-based infrastructure. Text has been included as per submission response to submission 121 on page 112 of the plan.</p>

4.8 - Specific Objectives		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-173 Galway Cycling Campaign	<p>Road and Street Network & Accessibility- New Objective</p> <p>Add new objective to Road and Street Network & Accessibility, p115</p> <p>"Evaluations of permeability in areas around district centres, neighbourhood centres and schools shall be carried out in the context of the 15-minute city concept policy. Where obstacles are identified which impair direct and convenient access to services and amenities at these centres by walking or cycling, measures to improve permeability will be planned and prioritised."</p> <p>Measures which will help to action this policy do not appear to be clearly defined. In many suburban areas, the existing built-environment and street layout around district centres, neighbourhood centres and schools are often the most significant obstacles to direct and convenient walking and cycling trips to these locations, even for those wishing to travel to these locations from nearby. There are examples in some suburbs where someone wishing to walk to a nearby school or retail centre 200m away would need to walk nearly 10 times that distance; 2km (25 minutes) each way along the circuitous network available for pedestrians. Given the designated status of district centres and neighbourhood centres as locations offering services and amenities, and the importance of and volume</p>	<p>CE Response</p> <p>The 15-minute city concept is included in several policies of the draft plan making provision for an accessible, sustainable and healthy city: Policy 3.3(8) Sustainable Neighbourhood Concept; Policy 4.2(6) Land Use and Transportation and Policy 7.5(2) Community Facilities.</p> <p>Accessibility measures and upgrades take place as part of capital projects and a rolling improvement program.</p>

	of daily trips to schools, identifying and prioritising permeability interventions in these areas would lead to greater effectiveness of such interventions.	
GLWC-C2-229 Friends of Merlin Woods	Modal Change: Public Transport Suggest that wording of Specific Objectives 4.8.1 and 4.8.2 be updated to ensure, where there is a risk of negative impact to important local biodiversity areas or protected sites, that early collaboration and discussion of solutions be carried out with local stakeholders and communities to prevent animosity and likelihood of legal challenge.	CE Response All projects are subject to public consultation and Policy 5.2 applies to project requirements. There is no facility to direct engagements between parties other than that statutorily provided for in the development management process.
GLWC-C2-162 HSE	UHG The HSE welcome the east west bus route through the UHG campus and request that the north south route be removed as a specific objective in the plan. The inclusion of this route would create issues for layout, functionality, safety and future development. The HSE note that the council previously asked that the southern access point be closed and that it is solely used for emergency vehicles and is not deemed suitable for through bus traffic.	CE Response Transport Section have recommended the removal of the objective for the north-south UHG bus route, as this route is now redundant. Objective to be amended to re-align the route along Newcastle Road where route is currently being developed. CE Recommendation Amend draft development plan map to remove the objective for the north-south UHG bus route and relocate route along Newcastle Road.



GLWC-C2-162 HSE	<p>MPUH (Proposed new access)</p> <p>The HSE welcome the proposed new access to MPUH and request that the map be amended to ensure that the proposed access route is not over existing buildings. This road access should be delivered in advance of the delivery of objectives for primary cycleway and bus route into the hospital, noting that the BusConnects project previously indicated a new signalised junction at the existing entrance.</p>	<p>CE Response</p> <p>Transport Section advises to retain this objective until there is a masterplan proposed for the hospital campus. It would be considered premature to remove until a strategic traffic assessment for the MPUH campus has been carried out. Access route will be realigned for greater clarity.</p> <p>CE Recommendation</p> <p>Amend map to include for marginal revision to alignment as per the existing development plan instead of as shown on the draft plan.</p>
GLWC-C2-229 Friends of Merlin Woods	Update policy 4.8.26: Update existing access to Merlin Park Hospital on the Dublin Road	<p>CE Response</p> <p>See submission 162 response above</p>
GLWC-C2-141 National Transport Agency	The NTA recommend that Section 4.8 Specific Objective No. 26 Facilitate a new access to Merlin Park Hospital from the Dublin Road be amended to clarify that any new access points on this road should be pedestrian and cycle only, having regard to new bus lane infrastructure along the Dublin Road and the need protect this investment in public transport and to facilitate sustainable travel	<p>CE Response</p> <p>See submission 162 response above</p>
GLWC-C2-190 An Taisce - Galway Planning Committee	<p>Merlin Park Hospital & Merlin Park Woods- Specific Objective Wording</p> <p>The Draft Galway City Development Plan contains Section 4.8.1 (Modal Change: Public Transport) a specific objective to "Implement traffic management and infrastructural changes to facilitate the development of a public bus network in accordance with the Galway Transport Strategy (GTS)". This should be reworded as proposed "Implement traffic management and</p>	<p>CE Response</p> <p>The draft plan proposes the outgoing objective for a bus lane on the Dublin Road. The objective for the link along Merlin Lane has been omitted.</p>

<p>infrastructural changes to facilitate the development of a public bus network in accordance with the Galway Transport Strategy (GTS), except to use an outgoing bus lane on Dublin Road instead of a new road through the North Merlin Park Woods.”.</p> <p>There is also a specific objective in Section 4.8.26 (Road and Street Network & Accessibility) to “facilitate a new access to Merlin Park Hospital from the Dublin Road”. This should be reworded to: “facilitate a new <u>layout of the existing entrance of Merlin Park Hospital and retain this as the only entrance</u> to Merlin Park Hospital from the Dublin Road”</p> <p>A new Public Transport Corridor is shown which would connect the Dublin Road to the Doughiska Road through Merlin Woods. A new road is also shown from the Dublin Road to the new Ambulance Centre in Merlin Park Hospital. There is no need for the proposed new road from the Dublin Road through the North Merlin Woods to Doughiska Road, because NTA have already approved a new outgoing bus lane on the Dublin Road. This new bus lane replaces the need for a new Public Transport Corridor through the North Merlin Woods. The impact of building the road would be to destroy the peace and tranquility that the North Merlin Woods, destroying forever the opportunity to create a new Public Park where families go to get away from traffic and noise.</p> <p>There is also no need for the proposed new road from Dublin Road to the new Ambulance Centre in Merlin Park Hospital. The existing road into Merlin Park Hospital is more than adequate for Ambulances and if it is not then an ambulance and bus lane can be added. There is a traffic problem at the entrance to Merlin Park Hospital, caused by lack of enforcement of planning applications for the premises opposite the entrance. This precludes new traffic</p>	<p>See response to submission 162.</p>
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	<p>lights, if needed. By simply moving the entrance eastwards by 50m however a modified entrance could be created on which traffic light could be installed.</p>	
GLWC-C2-211 SSE plc	<p>Decarbonise Transport</p> <p>Hydrogen has a strong potential to support decarbonisation in transportation segments such as HGVs and buses.</p> <p>Galway City Council should include the following planning policy / objective in its City Development Plan: 'Support the research, development and commercialisation of green hydrogen as a fuel for power generation, manufacturing, energy storage and transport.'</p> <p>As Ireland realigns its focus to reduce dependency on fossil fuels, decarbonize, and reach net-zero greenhouse gas emissions by 2050, the new City Development Plan provides a unique opportunity to consider the role and potential of Galway City in supporting overarching national goals and objectives. The coming decade will be critical in setting down the foundations of our broad ranging, long-term transition to a cleaner and more sustainable way of living and working. It has, therefore, never been more important to get planning policy right.</p> <p>To achieve our 2030 and 2050 climate targets, we must adopt an ambitious, innovative, and creative approach to decarbonization. Galway Hydrogen Hub offers the opportunity for the city to do this by leading on the development of Ireland's emerging green hydrogen industry.</p>	<p>CE Response</p> <p>Comments noted and supported. The text as proposed has been included with the exception of the word commercialization. Section 4.7 amendments as outlined in submission 121 response and recommendation.</p>
GLWC-C2-230 Dept. Housing, Local	<p>Galway Port + Greenway objective</p> <p>The department recommends inclusion in Policy 4.7 Galway Port and in relation to the objective in section 4.8</p>	<p>CE Response</p> <p>Included as a global objective in Core Strategy Policy 1.4(14).</p>

Government and Heritage	<p>to develop the national greenway network, to ensure compatibility with nature conservation and biodiversity protection and where potential issues have been addressed in Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Ecological Impact Assessment (ECIA) as appropriate.</p>	<p>Policy 5.2 Protected Spaces: Sites of European, National and Local Ecological Importance (Nos 1-15) covers this area comprehensively with regard to both plans and projects.</p>
GLWC-C2-141 National Transport Agency	<p>Amendments - NTA</p> <p>The NTA advise that a strategic review of the overall bus network for the city will be undertaken and recommend that the wording of Section 4.8 Specific Objectives - Modal Change: Public Transport is altered to reflect that the BusConnects Network Review as part of the review of the GTS will identify the appropriate areas to service with public transport. The review of the bus network will include a review of demand trip generators and attractors and will put forward a design for a network to meet the needs of the City area.</p> <p>'Objectives Modal Change'- Public Transport: Support a redesign of the bus network for the entire city area as part of the BusConnects Network Review through, or in conjunction with, the review of the Galway Transport Strategy and identify all areas to be served by the public transport network.</p>	<p>CE Response</p> <p>GTS is a holistic transport strategy incorporating all transport modes to prevent conflict between modes. GTS review will include a review of entire Bus Connects Network as indicated in this submission. This is covered in General Policy 4.1(5) and Specific Objectives 4.8(3) and 4.8(9). It is therefore considered that there is no need to amend policies or text as suggested.</p>
GLWC-C2-141 National Transport Agency	<p>The NTA recommend that Section 4.8 Specific Objective No. 27 Implement general road widening and street improvements for safety and convenience including at Bóthar na Cóiste be amended to include wording to facilitate improved infrastructure and safer environments for sustainable modes of transport such as walking, cycling and public transport.</p>	<p>CE Response</p> <p>Road and Street Network and Accessibility Policy 4.6.5 of the draft plan makes provision to: Implement best practice in road and street design as set out in the Design Manual for Urban Roads and Streets (2013) as updated (2019).</p> <p>Road and Street Network and Accessibility Policy 4.6(4) implements improvements on the general road network, including new links and junction revisions where needed in the interest of safety and convenience.</p>

		<p>It is considered that by adding for all users as proposed into both of these policies it will address concerns relating to safer environments for all sustainable modes of transport.</p> <p>CE Recommendation</p> <p>Amend Road and Street Network and Accessibility Policy 4.6(5) Implement best practice in road and street design for all users as set out in the Design Manual for Urban Roads and Streets (2013) as updated (2019) and (2020).</p> <p>Amend Road and Street Network and Accessibility Policy 4.6(4) implements improvements on the general road network, including new links and junction revisions where needed in the interest of safety and convenience for all users.</p>
GLWC-C2-141 National Transport Agency	The NTA recommend in relation to access points along the Western Distributor Road that Section 4.8 Specific Objective No. 29 should be amended to clarify that any new access points will be pedestrian and cycle only in order to protect investment in public transport and to facilitate sustainable travel.	<p>CE Response</p> <p>Existing policy to restrict access onto Western Distributer Road, Bishop O'Donnell and Seamus Quirke. The Council does not want to restrict further. Having reviewed this suggestion, the Transport Section considered this too restrictive. Any permitted access will make provision for walking and cycling access.</p>
GLWC-C2-141 National Transport Agency	The NTA recommend in relation to access at Boireann Bheag estates that Section 4.8 Specific Objective No. 32 should be amended to ensure that any new access points will be pedestrian and cycle only in order to protect investment in public transport and to facilitate sustainable travel.	<p>CE Response</p> <p>Policy is just to investigate provision as at present there is only one vehicular access point and to allow for better traffic management and new vehicular accesses is a necessary consideration and can accommodate pedestrian and cycle access also.</p>

Chapter 4: Sustainable Mobility and Transportation CE Recommendations

- 1 a. Reference in the draft plan to DMURS will be updated and acknowledge all supplemental advice notes.
- b. Reference within the plan relating to Smarter Travel, A Sustainable Transport Future, 2009-2020 policy will be replaced with references to the National Sustainable Mobility Policy.
- c. References to Department of Transport, Tourism and Sport will be replaced with the Department of Transport.
- d. References to NTA's five year Walking and Cycling infrastructure Delivery Plan 2021-25 will be replaced with the reference to NTA's forthcoming Walking and Cycling Infrastructure Delivery Plan.
2. Amend General Policy 4.1.5 of the draft plan to delete ~~strikethrough~~ text and include text in green
Support the Galway Transport Strategy (GTS) and the outcomes of the planned evidenced based review to be carried out in conjunction with Galway County Council, and the NTA 'and other stakeholders'. This review will consider all transport modes including the feasibility of a very light rail/light rail option and will not preclude the advancement of the Cross City Link route to planning consent stage.
3. Amend Policy 4.2(6) Land Use and Transportation to insert text in green
“Aim to achieve the concept of a '15-minute city' where land use policies facilitate residents to access their daily needs within a 15-minute walk or bike ride and thereby reduce the dependence on private car transport”
4. Amend text under Galway Transport Strategy (GTS) heading in 6th paragraph to delete ~~strikethrough~~ text and insert text in green
“A planned evidenced based review of the GTS is due to commence ~~be carried out in 2022 and be completed in 2023~~ in conjunction with Galway County Council and, the National Transport Authority (NTA) and other stakeholders. This process will include for public consultation, which will consider all transport modes including the feasibility of a very light rail/light rail option and will not preclude the advancement of the Cross City Link route to planning consent stage.”
5. Amend text in Section 4.3 Public Transport under Rail heading in first paragraph to include text in green
The NDP includes for the Dublin–Galway rail lines to be subject to an examination to move to higher speeds leading to improved connectivity to regional cities through improved rail journey times. This is being further examined under the All-Ireland Strategic Rail Review. The potential for double tracking of the railway line from Galway City to Athlone with increased service stops between Athlone and Galway will improve commuter...
6. Amend text in Section 4.3 Public Transport in second paragraph under Rail heading to include text in green
“Such works to the line may also benefit the provision of a rail freight service from Galway Port and is a strategic project that would enhance accessibility and connectivity in the region. The recent Rail Freight 2040 Strategy includes for an ambitious vision positioning rail at the centre of Ireland's freight transport system, recognising the sustainable benefits that rail provides as a contribution towards achieving Ireland's climate objectives and wider strategic national outcomes.”
7. Amend Policy 4.6 (5) Road and Street Network and Accessibility to include text in green
Implement best practice in road and street design for all users as set out in the Design Manual for Urban Roads and Streets (2013) as updated (2019) and (2020).
8. Amend Policy 4.6(4) Road and Street Network and Accessibility to include text in green

Implement improvements on the general road network, including new links and junction revisions where needed in the interest of safety and convenience **for all users**.

9. Amend text in first paragraph under Section 4.7 Galway Port to include text in green

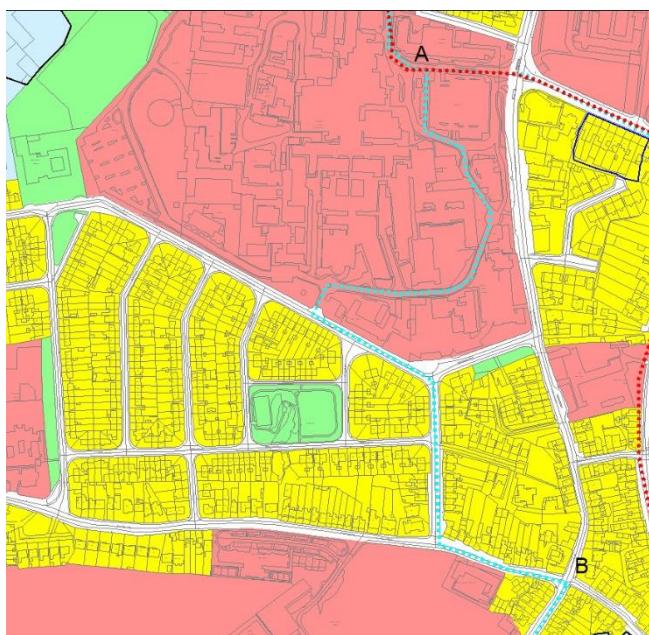
Galway Port is an important transport facility. It also acts as an important strategic regional hub for petroleum importation, storage and distribution and it serves the tourism industry as it is an important ferry port for passengers to the Aran Islands. An application for a significant 27-hectare expansion of the Port is currently at government level being accessed to determine if the compensatory measures would be sufficient to ensure the integrity of the Special Area of Conservation (SAC). If approved, this will give significant potential to diversify **port activities, with particular regard to both the renewable energy sector and offshore wind energy opportunities**. The establishment of land based infrastructure to service offshore energy will enable Galway Port to play a much greater role in supporting this sector in the future, which will become increasingly important to the region as the role of fossil fuels become less significant over time.

**10. Amend first paragraph in Section 4.5 Transport Demand Measures to include text in green:
(RESPONSE TO OPR SUBMISSION)**

The Five Cities Demand Management Study identifies transport demand drivers, and assesses the suitability of measures to reduce demand in Ireland's five largest urban centres—Dublin, Cork, Waterford, Limerick, and Galway. The recommendations from this report included that opportunities may arise in the future in Galway with the delivery of enhanced public transport and park and ride facilities as envisaged in the Galway Transport Strategy. The Study provides a focused and evidence-based approach to addressing the carbon, congestion and air quality challenges facing Irish Cities. Galway City Council is committed to addressing these challenges as reflected in the policies and objectives which support a modal shift, active travel measures, park and rides and the 15 minute city and neighbourhoods concept. The scheduled review of the GTS, due to commence in 2022 and be completed in 2023, will also provide an opportunity to re-evaluate transport demand measures.

Mapping Amendments

11. Amend draft development plan map to remove the objective for the north-south UHG bus route and relocate route along Newcastle Road.



Original: North-south UHG bus route



Amendment: Relocated north-south UHG bus route along Newcastle Road

12. Amend map to include for marginal revision to alignment as per the existing development plan instead of as shown on the draft plan.

Chapter 5: Natural Heritage, Recreation and Amenity

5.1 - Context		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-148 Galway City Community Network	Climate / biodiversity Insert policy that the Council will take environmental and biodiversity issues into account in every action of the plan, so they are totally integrated across all sectors.	CE Response The plan has been prepared in tandem with rigorous environmental assessment through the Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk assessment process which ensures that these issues are integrated across all sectors. Existing policy in the plan ensures that these issues are taken into account in all plans and projects. There is an extensive policy framework in Chapter 5 to ensure that protection.
GLWC-C2-229 Friends of Merlin Woods	Habitat loss must be avoided. Blackthorn and hazel woodlands are classified as scrub and need to be protected.	
GLWC-C2-228 Galway Environmental Network	Biodiversity Loss presents an existential threat at least equivalent to and probably greater than Climate Breakdown. Declare a Climate and Biodiversity Emergency. Various strategies, plans and documents are referenced and request to provide necessary resources to support the Biodiversity Officer in recovering, restoring and renewing Biodiversity within the city. Assessing every single policy and objective in the Draft Development Plan to ensure that it will achieve a 'Biodiversity Net Gain', not just 'No Net Loss' Ensure that permissions for development have appropriate conditions attached to recover, restore and enhance biodiversity and ecosystems.	Chapter 5 refers to the declaration by government of Climate and Biodiversity Emergency and includes in Policy 5.1 to protect and restore biodiversity. It also supports the implementation of the National Biodiversity Action Plan (2017- 2021) and the All-Ireland Pollinator Plan (2021-2025). It support the actions of the City Council's Heritage Plan 2016-2021 and Biodiversity Action Plan 2014-2024 relating to the promotion of ecological awareness, biodiversity and best practices. It is proposed to amend text to include reference to the EU Biodiversity Strategy for 2030. CE Recommendation Amend section 5.2 Green Network 2 nd paragraph to include text in green as follows: The green network approach seeks to manage and protect the environment and in doing so, meet the requirements of a number of European Directives

		<p>including Habitats, Birds, Water Framework and Floods Directives. It also supports the EU Biodiversity Strategy for 2030 which sets out a comprehensive framework of commitments and actions to tackle the main causes of biodiversity loss. At national level it lends support to the <i>National Biodiversity Action Plan 2017-2025</i>, <i>National Landscape Strategy for Ireland 2015-2025</i> and the <i>All-Ireland Pollinator Plan</i>. It is embedded in the MASP and at local level in the <i>Galway Heritage Plan 2016-2021</i>, the <i>Galway City Biodiversity Action Plan 2014-2024</i> and the <i>Climate Adaptation Strategy (2019-2024)</i>.</p>
GLWC-C2- 228 Galway Environmental Network	<p>National Biodiversity Action Plan</p> <p>Include a range of objectives from the current National Biodiversity Plan</p>	<p>CE Response</p> <p>The draft plan includes reference to the National Biodiversity Action Plan 2017-2021 and specific policy (5.1) to support its implementation. It is proposed to refer to any subsequent NBAP taking account of the timescale of the plan and any updated plan.</p> <p>CE Recommendation</p> <p>Amend Policy 5.1 Green Network and Biodiversity no. 4 to include text in green as follows:</p> <p>Support the implementation of the National Biodiversity Action Plan (NBAP) 2017- 2021 (and any subsequent NBAP) and the All-Ireland Pollinator Plan (2021-2025) and support the actions of the City Council's Heritage Plan 2016-2024 and Biodiversity Action Plan 2014-2024 relating to the promotion of ecological awareness, biodiversity and best practices.</p>
GLWC-C2- 228 Galway Environmental Network	<p>Community Participation</p> <p>Support community groups to integrate the All-Ireland Pollinator Plan into local green spaces and increase awareness.</p> <p>Collaborate with the extensive knowledge base within NUI Galway, GMIT, local NGOs, community and voluntary groups.</p>	<p>CE Response</p> <p>There are a range of initiatives in place to support communities and actions in the All-Ireland Pollinator Plan and which are referenced in the draft plan. These include the the "Healthy Green Spaces", "Green Flags for Parks" and "Greening of the Laneways" all of which are being progressed in conjunction with local communities, schools and voluntary groups to enable the development of amenity spaces and support biodiversity. It is also</p>

		<p>noted that the council have the benefit of a recent appointment of a Biodiversity Officer who will support all directorates including planning.</p> <p>A key policy of the plan is to support implementation of the All-Ireland Pollinator Plan.</p> <p>Policy 5.4 includes to promote partnerships with the community for the management and improvement of biodiversity in local open spaces...</p> <p>The Council welcome collaboration and recognise the expertise and knowledge that is available in the city.</p>
GLWC-C2- 147 Galway City Community Network	<p>Monitoring UN SDGs</p> <p>Relevant SDGs: SDG 13, Climate Action, SDG 14, Life Under the Water and SDG 15 Life on Land.</p> <p>Indicators:</p> <p>SDG 14 and SDG 15 - Protection of European Sites; Demonstrating the protection, restoration and sustainable use of terrestrial ecosystems, and halt and reverse land degradation and halt biodiversity loss; d</p> <p>Demonstrating compliance to SDG GFI 15.9.1 (a) established national targets in accordance with national biodiversity strategies and action plans and the progress reported towards these targets; and (b) integration of biodiversity into national accounting and reporting systems, defined as implementation of the System of Environmental-Economic Accounting;</p> <p>Urban Woodlands - forest area as a proportion of total land area (SDG GFI 15.1.1) and the rate of progress towards sustainable forest management;</p>	<p>CE Response</p> <p>Please refer to CE Report Response to OPR and response to Appendix 1 Implementation and Monitoring.</p>

	Invasive species - adequately resourcing the prevention or control of invasive alien species and biodiversity audit to measure outcome of actions.	
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5.2 - The Green Network

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-189 Galway National Park City initiative	Galway National Park City Submission would like recognition of its mission statement included in the Galway City Development Plan 2023-2029.	CE Response The aims and principles of the concept of Galway as a “National Park City” are accepted as admirable, worthy and important ideals to aspire towards, motivated by the London National Park city movement which is grounded by a charter which requires support through voluntary partnership.
GLWC-C2-187 Brendan Smith	Cities in Britain, the European continent, North America and Australia are working towards this designation supported by their local governments, and following the lead of London and Adelaide who are the world’s first National Park Cities.	Unlike the internationally recognised idea of a national park the concept currently being proposed is not supported by state law and is not accompanied by standards and objectives for management and therefore will not have a collective understanding of what such a title would mean.
GLWC-C2-27 Grainne Faller		In the absence of this grounding definition it is considered that introducing the concept as proposed into a statutory plan would be confusing and create contradictions in the vision for Galway as a designated NPF Regional City.
GLWC-C2-209 Lenny Antonelli		
GLWC-C2-228 Galway Environmental Network	The designation will help the city encapsulate the ethos of the European Green Deal, fulfil the majority of the United Nations’ Sustainable Development Goals and on key aspects of the Irish Government’s Programme for National Government.	
GLWC-C2-127 Roselyn Carroll		
GLWC-C2-33 James McCarthy	It is about increasing awareness and of encouraging dynamic positive change towards enhancing the natural environment, greenifying the built development and encouraging sustainability in all aspects of life.	The proposed label of National Park City is not like other awards or designations such as European City of Culture, Blue Flag Status, Purple Flag Status, European Green leaf. These are set by recognised institutions and structures, they come with requirements / standards to be met. They have defined meaning and can also attract specific codes, obligations and planned targets and accountability.
GLWC-C2-227 Brendan Mulligan		
GLWC-C2-188 Siobhan Fitzgerald		This is not to dismiss the high value of citizen engagement and support for making Galway greener, wilder, healthier and to explore ways to improve the relationship between people and their natural environment.

		<p>It is noted that the draft plan has a comprehensive policy framework which supports the green network concept in the city which supports many of the aims and principles that the movement aspire to.</p> <p>It is considered that the best way to advance these aims and principles is to continue to get the pledged commitments from individuals /community groups /institutions to actions and to work with the City Council as a key partner though the work of the various sections in the City Council including Recreation & Amenity, Planning, Environment, Transport, Community & Enterprise and the LECP. It is also suggested that it is more appropriate to be considered as part of the preparation of the Greenspace Strategy which will be subject to public consultation and member's approval and can be considered in conjunction with this process.</p>
<p>GLWC-C2-148 Galway City Community Network</p> <p>GLWC-C2-228 Galway Environmental Network</p>	<p>Policies 5.2 Green Network and Biodiversity</p> <p>Request early stage pre planning consultation between local environmental groups and developers to ensure plans protect the environment and biodiversity.</p> <p>Embed biodiversity protection and enhancement into Local Area Plans, masterplans, and framework plans.</p> <p>Request all proposed developments undergo a green audit.</p> <p>Complete space audit of green open spaces in relation to existing and proposed housing stock in order to compensate for any found deficiency (i.e. Knocknacarra, Westside, and Newcastle / Western Distributor Road).</p>	<p>CE Response</p> <p>Pre planning consultation is held between the local authority and the applicant and it is not appropriate or feasible to include local environmental groups.</p> <p>The facility for public engagement for local environment groups is accommodated at planning application stage. The planning authority also avail of requested opinions from prescribed bodies including heritage bodies.</p> <p>All developments are assessed in accordance with policy in Chapter 5 and standards in Chapter 11 in relation to provision of green space.</p> <p>The preparation of Local Area Plans as statutory plans are subject to environmental assessments.</p> <p>Biodiversity protection and enhancement will be required to be a consideration of masterplans and framework plans.</p> <p>The Greenspace Strategy will consider the needs for green open space in the city and identify where there are deficiencies.</p>

GLWC-C2-189 Galway National Park City initiative	Policies for Green Network & Biodiversity	CE Response
GLWC-C2-228 Galway Environmental Network	<p>Proposes a range of policies in relation to greenspace, biodiversity and habitat protection and improvement, provision of ecological Corridors, green bridges, tree planting and rewilding and improved connectivity.</p>	<p>The draft plan includes extensive policy support to protect and enhance biodiversity and habitats in the city (including Policy 5.1 Green Network and Biodiversity, 5.2 Protected Spaces: Sites of European, National and Local Ecological Importance, 5.3 Blue Spaces: Coast, Canals and Waterways).</p>
GLWC-C2-229 Friends of Merlin Woods	<p>Carry out an inventory of habitats in the city.</p>	<p>It also supports the actions of the City's Heritage Plan and Biodiversity Action Plan with regard to the protection, enhancement and restoration of local biodiversity and habitats.</p>
GLWC-C2-27 Grainne Faller	<p>Recognise a range of valuable habitats that must be recovered, restored and enhanced.</p>	<p>Policy 5.2 Protected Spaces: Sites of European, National and Local Ecological Importance, provides for the protection of wildlife corridors and stepping stones and to prevent habitat fragmentation.</p>
	<p>To expand the number of Local Biodiversity Sites and to give increased protection to the city main parks of Barna/Rusheen Bay, Merlin and Terryland Forest.</p>	<p>The plan also refers to the value of road verges as linear green corridors and that off road routes should incorporate nature based and biodiversity features to support wildlife corridors and connections to the green network. Also in support of connectivity is Policy 5.1 Green Network and Biodiversity to continue to implement measures to increase and restore biodiversity in open spaces and road verges.</p>
	<p>To protect the rural character and heritage of areas such as Menlough and Castlegar.</p>	<p>The Biodiversity Action Plan proposes to resurvey and record the local biodiversity areas. It also seeks to identify any additional wildlife corridors and stepping stones which are of high value and merit in the green network.</p>
	<p>To develop a pedestrian-cycle city wide network and network of greenways and a 'boreen' public walking route network in Castlegar, Menlo, Coolough and other areas of the city that have strong rural characteristics.</p>	<p>With regard to protection of city parks, a key objective in Section 5.10 is to prepare masterplans for parks and that a key management objective will be to maintain and enhance their biological diversity.</p>

	<p>use of native trees and other plant species, particularly pollinator friendly species.</p> <p>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.</p> <p>Any proposal to update the inventory of habitats in the city is a matter for the Biodiversity Officer and Environment Section.</p> <p>With regard to Menlough and Castlegar the plan in Chapter 3 village envelopes recognizes the character and heritage of these areas. Policy 3.9 seeks to protect and enhance the character and amenity of Menlough and prepare a plan for the area, which will include for flood mitigation measures.</p> <p>Both Chapter 5 and Chapter 3 provide for a network of greenways and boreens in the city. Section 5.7.1 refers specifically to Greenways, Boreens and Public Rights of Way and policy support is included in Policy 5.5 Community Spaces: Greenways, Boreens and Public Rights of way.</p>	
<p>GLWC-C2-229 Friends of Merlin Woods</p> <p>GLWC-C2-230 Dept. Housing, Local Government and Heritage</p> <p>GLWC-C2-148 Galway City Community Network</p>	<p>Green Network and Biodiversity</p> <p>Insert additional text in Policy 5.1.1 and Policy 5.1.19 Green Network and Biodiversity and Policy 5.5.5 Community Spaces to ensure compatibility with nature conservation and biodiversity protection and where potential issues have been addressed in Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Ecological Impact Assessment (ECIA) as appropriate.</p> <p>Insert more detailed policy in relation to compliance with the provisions of the European Communities</p>	<p>CE Response</p> <p>It is considered that there is sufficient policy focus to address the issues raised. Policy 1.4 Core Strategy includes to support the implementation of the SEA Directive, the Habitats Directive, Birds Directive, EIA Directive and Water Framework Directive and appropriate supporting legislation and guidelines. Policy 5.2 Protected Spaces: Sites of European, National and Local Ecological Importance sets out detailed policy in this regard.</p> <p>Chapter 11 Section 11.32 sets out detailed requirements for Appropriate Assessment and Chapter 11 Section 11.34 requires Ecological Impact Assessment (EIA).</p> <p>Draft plan policy includes to support enhancement and restoration of biodiversity. The Development Management Section also can address this in layout and design.</p>

	<p>Birds and Habitats Regulations 2011 (S.I. 477/2011) in relation to the control of invasive species</p> <p>Provide for conservation and enhancement of habitat where possible. If this is not possible, substitute enhanced habitat should be made available.</p> <p>Develop a new Biodiversity Plan that looks beyond the current action plan which ends in 2024.</p>	<p>The Biodiversity Plan runs to 2024, a review of the plan is being considered by the Biodiversity Officer.</p> <p>CE Recommendation:</p> <p>Amend Policy 5.2 Protected Spaces: Sites of European, National and Local Ecological Importance and insert text in green as follows:</p> <p>14. Support and implement measures to control and manage alien/invasive species, where appropriate in accordance with the EU (Birds and Natural Habitats) Regulations 2011.</p>
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5.3 - Protected Spaces

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-229 Friends of Merlin Woods	<p>Management plans for sites of ecological importance</p> <p>Need for management plans to protect areas from overuse/trampling and allow regeneration and rewilding. May also require temporary fencing to facilitate recovery.</p>	<p>CE Response</p> <p>Policy 5.2 Protected Spaces: Sites of European, National and Local Ecological Importance, includes to co-operate with the NPWS, landowners and stakeholders in the preparation and implementation of management plans for designated sites.</p> <p>It is also noted Section 5.10 includes an objective to prepare masterplans for parks and that a key management objective will be to maintain and enhance their biological diversity. The council would concur that measures such as temporary fencing to facilitate recovery may be required in certain areas and is an operational issue for recreation and amenity- for example currently at Bearna Woods.</p>
GLWC-C2-229 Friends of Merlin Woods GLWC-C2-228 Galway Environmental Network	<p>Merlin Park Woods has areas of European Importance Annex 1 habitats which would fall in the protection of the Habitats Directive. The importance of these high status sites must be recognised in the plan.</p>	<p>CE Response</p> <p>The draft plan recognises the need to protect annex 1 habitats and Policy 5.2 Protected Spaces: Sites of European, National and Local Ecological Importance, includes to Protect and conserve rare and threatened habitats and their key habitats, (wherever they occur) listed on Annex I and Annex</p>

	<p>IV of the EU Habitats Directive (92/43EEC) and listed for protection under the Wildlife Acts 1976-2000.</p> <p>It also includes to protect the ecological integrity of statutory Nature Reserves, refuges for fauna and Annex 1 Habitats.</p> <p>With regard to Merlin Park Woods, it is also noted that Section 5.10 includes an objective to prepare masterplans for parks including Merlin and that a key management objective will be to maintain and enhance their biological diversity. Given the presence of annex 1 habitat at this location, it is considered appropriate to include within Table 5.6 Network of Local Biodiversity Areas</p> <p>CE Recommendation:</p> <p>Amend Table 5.6 Network of Local Biodiversity Areas and insert text in green as follows:</p> <table border="1"> <thead> <tr> <th>Description</th><th>Details</th></tr> </thead> <tbody> <tr> <td>Merlin Park Woods</td><td>Mature broad-leaf trees, mixed broad-leaf / conifer woodlands, includes annex 1 habitat.</td></tr> </tbody> </table>	Description	Details	Merlin Park Woods	Mature broad-leaf trees, mixed broad-leaf / conifer woodlands, includes annex 1 habitat.
Description	Details				
Merlin Park Woods	Mature broad-leaf trees, mixed broad-leaf / conifer woodlands, includes annex 1 habitat.				
GLWC-C2-230 Dept. Housing, Local Government and Heritage	<p>Policy 5.2 Protected Spaces:</p> <p>Amend Policy 5.2 Protected Spaces: Sites of European, National and Local Ecological Importance to include preparation of ecological impact assessments, further elaboration on Article 10 of the Habitats directive and use of native Irish species.</p> <p>Include detailed policy/objectives in relation to Annex IV species, the requirements of the Wildlife Acts and Circular Letter NPWS 2/07, use of flood plains as green infrastructure and provision of ecological advice.</p> <p>CE Response</p> <p>The draft plan already includes a number of these issues. Section 5.3.2 includes that development proposals which are likely to impact on species and/or habitats outside of designated sites, will be required to carry out an Ecological Impact Assessment (EIA) in order to assess the impact and where appropriate will be required to include mitigation measures.</p> <p>Chapter 11 Section 11.34 requires Ecological Impact Assessment (EIA) to be undertaken for developments proposed in areas that support, or have the potential to support, protected species or features of biodiversity importance, and that appropriate avoidance and mitigation measures are incorporated into all development proposals.</p>				

	<p>Include a clear objective to ensure that the planning enforcement system works effectively and to ensure that sites are restored as required.</p> <p>The objective for land acquisition should include for nature conservation/biodiversity purposes also.</p> <p>Include references to Wildfowl Sanctuaries and the Flora Protection Order.</p>	<p>Text is included in the draft plan that the Council will include measures to encourage biodiversity and ecological stepping stones in developments, including native species planting (Section 5.3.3).</p> <p>It is considered that clear policy and text in relation to Article 10 of the Habitats directive is included (see Policy 5.2 Protected Spaces: Sites of European, National and Local Ecological Importance, no. 4 and text in Section 5.3.3) and does not require further elaboration.</p> <p>Policy/objectives in relation to Annex IV species and the requirements of the Wildlife Acts is set out in Policy 5.2 Protected Spaces: Sites of European, National and Local Ecological Importance, no.10 and it is not considered a necessary requirement to include Circular Letter NPWS 2/07 which refers annex iv species and to guidance on compliance with Regulation 23 of the Habitats Regulations 1997- strict protection of species/derogation licences.</p> <p>The draft plan refers to the value of flood plains and includes policy to protect the natural floodplains along the River Corrib and its tributaries and to protect riparian strips.</p> <p>With regard to enforcement, it should be noted that responsibility for same may span various legislation and bodies.</p> <p>The draft plan refers to the Wildfowl Sanctuary at Lough Rusheen designated under the Wildlife Acts1976 & 2000.</p> <p>CE Recommendation</p> <p>The following amendments to the draft plan are recommended:</p> <p>Amend Policy 5.2 Protected Spaces: Sites of European, National and Local Ecological Importance - include text in green as follows:</p> <p>10. Protect and conserve rare and threatened habitats and their key habitats, (wherever they occur) listed on Annex I and Annex IV of the EU Habitats Directive (92/43EEC) and listed for protection under the Wildlife Acts 1976-2000 and plant species listed in the Flora Protection Order 2015.</p>
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		<p>15. Protect the ecological integrity of statutory Nature Reserves, Wildfowl Sanctuaries, refuges for fauna and Annex 1 Habitats.</p> <p>Amend Section 5.10 Specific Objectives No. 38 - include text in green as follows:</p> <p>38. Progress the acquisition of lands for recreation and amenity and including land for nature conservation/biodiversity purposes, and other lands which will enhance the extent of the green network, in particular key linkages and lands for active and passive recreation.</p>
GLWC-C2-179 Department of the Environment, Climate and Communications	<p>Geological sites</p> <p>GSI welcomes inclusion of additional County Geological sites in the draft plan and policy set out in policy 5.2 and reference made in section 11.9 in relation to Merlin Park quarry.</p> <p>GSI encourage geo heritage and marine geo heritage to part of tourism initiatives and museum exhibits.</p> <p>GSI request conditions to be attached to permissions in relation to quarry interpretation and aftercare allied to promotion of heritage.</p>	<p>CE Response</p> <p>Noted</p> <p>The Council concur that the incorporation of geo heritage and marine geo heritage as part of tourism initiatives and museum exhibits is to be encouraged, however this is outside the scope of the plan and can be addressed directly with the museum, other tourism projects and agencies.</p> <p>Details of aftercare which could include interpretation is a normal consideration of quarry applications. This is an issue for the development management process and inclusion of bespoke planning conditions.</p>

5.5 - Blue Spaces		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-10 Trevor Dunne	<p>Salthill Tidal Pools</p> <p>Tidal pools in Salthill to be reinstated</p>	<p>CE Response</p> <p>Section 5.10 Specific Objective no. 3 includes to investigate the feasibility of a restoration project for the tidal pools at Salthill taking into consideration technical feasibility, funding, management and maintenance, public safety,</p>

		climate change considerations and impacts on the environment and European sites.
GLWC-C2-42 OPW	The OPW welcomes the commitments in policy 5.3 Blue Spaces: Coast, Canals and Waterways to require the facilitation of sustainable flood defence and coastal protection works, the protection and maintenance of undeveloped riparian zones and natural floodplains along the River Corrib and its tributaries.	CE Response Noted
GLWC-C2-132 NUI Galway	Waterbased sports facility NUI Galway welcomes intention to review RANS and has identified a need for a bespoke water-based sports facility and supports development plan objective in this regard. NUI Galway supports the expansion of the Galway to Connemara Greenway and greater connections between the campus and the city. Suggested update to Policy 5.3 Blue Spaces: Coast, Canals and Waterways Develop and enhance the recreational and amenity potential of the city's waterways (including the River Corrib) and coastal area, while not compromising the ecological importance of these areas.	CE Response The NUIG submission is noted. While the Council recognise the importance of the River Corrib, the suggested update to make specific reference only to the River Corrib over other waterways is not deemed appropriate.
GLWC-C2-73 Philip James GLWC-C2-189 Galway National Park City initiative GLWC-C2-230 Dept. Housing,	Blue Spaces Have a Plan for the Management and Development of the Waterways in Galway City. Galway's rivers and canals are a defining characteristic of the city however there is no plan, no specific policies, and a poorly defined governance structure.	CE Response Issues in relation to responsibilities and governance are outside of the scope of the plan. The draft plan has a specific section dedicated to blue spaces and rivers, canals and waterways (Section 5.5.2) and includes Policy 5.3 Blue Spaces: Coast, Canals and Waterways, which includes to develop and enhance the recreational and amenity potential of the city's waterways while not compromising the ecological importance of these areas; to

Local Government and Heritage	<p>Raise awareness and appreciation of Galway City's extensive network of natural and man-made waterways and to ensure good management and sensitive development for Galway's residents, visitors, and wildlife.</p> <p>Convert the old non-operational municipal Waterworks on the Dyke Road into a forestry/waterways interpretative centre with gallery, café etc</p>	<p>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 and water based recreation can be developed to the benefit of the city, and have regard to ecological conservation and safety considerations; to ensure the conservation of the canal corridor and require that developments abutting the canal relate to the context of the adjacent environment and contribute to the overall amenity, and explore the possibility of opportunities for public access; to work with stakeholders, including IW, OPW, EPA, Inland Fisheries and Corrib Navigation Trust in the management of the river and canal systems.</p> <p>Specific objectives set out in Section 5. 10 include:</p> <p>4. Investigate possible locations for the provision of municipal water based recreation infrastructure along the River Corrib and canal system.</p> <p>5. Initiate the preparation of a river conservation management plan in consultation with the relevant stakeholders. The purpose of the plan will include examination of best locations for the development of water based activities that will minimise environmental, biodiversity and ecological impacts.</p> <p>A specific objective set out in Section 8.10 is to facilitate the conservation, adaptation and reuse of the waterworks building at Terryland Water Treatment Plant.</p>
GLWC-C2-230 Dept. Housing, Local Government and Heritage	<p>Policy 5.3.10</p> <p>The Department recommend policy 5.3 no. 10 which restricts the location of certain structures within 10 metres of the River Corrib in G zoned lands be extended to other zones.</p>	<p>CE Response</p> <p>It is not appropriate to extend the 10m restriction to other land use zones as many of these zones are located within the existing built up footprint with buildings which have a close relationship with the waterways.</p>

5.6 - Green Spaces

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-27 Grainne Faller GLWC-C2-228 Galway Environmental Network	Mowing Reduce frequency of mowing/mow only desire lines to promote walking i.e. Nolan Park, Renmore during summer 2020.	CE Response The draft plan supports the no mow initiatives, this site specific issue will come under the Recreation and Amenity Section work programme.
GLWC-C2-208 David Howard	Quincentennial Park, Salthill Park and Toft Park Green Spaces: Quincentennial Park, Salthill Park and Toft Park should be maintained as open green spaces and should not have any additional built infrastructure installed. These spaces should continue to be used for biodiversity projects. Additional trees should be planted in Salthill Park.	CE Response The Greenspace Strategy will consider any additional needs in these areas. Tree planting and biodiversity is supported in policy in Chapter 5 and Chapter 11. Specific tree planting in areas such as Salthill park would come under the work programme and service delivery plan for the Recreation and Amenity Section.
GLWC-C2-150 Angela Casey GLWC-C2-184 Valerie Walsh	Fr. Burke Park Fr Burke park is considered to be a City Centre small-scale park at Table 5.2 of the draft Plan. The park is considered as a Local Park in Figure 5.3 of the draft plan. The exact status of Fr Burke Park, and the differences that apply to a local park and a small-scale park are required. Section 5.6 of the plan is entitled Green Spaces. However, there is no specific policy objective in this section of the plan; please include specific policy objectives in the draft plan so that Fr Burke Park has some protections from development. Section 5.6 refers to a hierarchy of parks; the order of the hierarchy is not stated. Please address this omission.	CE Response The Fr. Burke Park is identified as a local park in the park hierarchy (fig 5.3) and is identified in Table 5.2 Open Spaces in the Green Network as a small scale park in the city centre. There are no conflicts in these attributes, it is a functional local park and is small in scale as described. The small scale parks are less than 1 ha in contrast to the city parks which are in excess of 10 ha. Fr Burke Park is a designated park and is zoned for RA use. The zoning objective clearly affords both definition of use and also protection of the function of the space as a park. Maintenance and management issues raised are part of the operational work programmes of the Recreation and Amenity Section.

	The northern boundary of Fr Burke Park has a line of native Hawthorn trees that are dying because of lack of maintenance (ivy removal). Hawthorn trees are very strong in Irish folklore. The protection and reinstatement of these Hawthorn trees should be included in the draft Plan; indeed they could be a tourist attraction for the city, similar to the cherry blossom in Japan, if maintained and managed correctly.	
GLWC-C2-82 Aran Murray	Galway should have more Green Spaces and trees.	<p>CE Response</p> <p>The policy framework set out in Chapter 5 supports enhancements to the green network including acquisition of lands and tree planting. As part of the development management process, open space and landscaping schemes are required also.</p>
GLWC-C2-162 HSE	<p>Tree Preservation Orders</p> <p>The HSE request in relation to Policy 5.4 to make Tree Preservation Orders for individual trees or groups of trees within the city, where appropriate, that these are considered carefully and avoid the hospital campuses where possible.</p>	<p>CE Response</p> <p>This is noted, Tree Preservation Orders for individual trees or groups of trees within the city will be considered carefully and will be based on full assessment of the tree/group of trees regardless of location. Any such process will include for consultation as provided for in legislation which is outside of the development plan process.</p>

5.7 - Community Spaces		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-1 Joseph Fahy	Protected views No methodology outlined to indicate how protected views were selected in section 5.7.3 and Table 5.9. Photograph submitted from Dangan riverside path looking at Menlo castle for consideration. Include the views and prospects along the River Corrib from lake to estuary in Section 5.7.3. These views are important and fit the criteria listed in Section 5.7.3 as such they should be protected.	CE Response The existing protected views outlined in Table 5.9 Protected Views are based on an assessment of their merits as views open to the public for their enjoyment. Any proposed additions can be considered and are based on a full assessment using criteria including scenic amenity, aesthetic and cultural value and historic setting. With regard to the view from Dangan riverside looking northwards, notwithstanding the value of this current viewline, it would not be appropriate to designate this as a protected view as it would conflict with the strategic objective to provide for the N6GCRR. The route of the N6GCRR has been approved by An Bord Pleanála and the associated bridge crossing will impede on this view as is demonstrated in photomontages included in the EIAR submitted with the planning application for the N6GCRR which can be viewed at http://www.n6galwaycityringroad.ie/
GLWC-C2-17 Foróige	Recreational Spaces for Young People Lack of youth friendly facilities and recreational spaces for 10-18 year olds, such as skateboard parks, BMX parks and pump tracks in Galway City West area. They are needed to address the needs of young people.	CE Response Policy 5.6 Community Spaces: Child Friendly City includes to enhance the provision of facilities for older children and teenagers within the city, including skateboarding areas, teenage shelters, ball walls and Multi Use Games Areas (MUGAs). Table 11.2: Indicative Examples of Recreational Facilities for Different Sizes of Residential Developments includes for such facilities including skateboarding. The Greenspace Strategy will identify the need and locations for a range of facilities to address the needs of young people.
GLWC-C2-30 Eugene McKeown	5.7.3 Views of Special Amenity Value and Interest	CE Response

GLWC-C2-127 Roselyn Carroll	<p>At present there is no protection for the unique and special recreational value of the quiet space that exists along the Riverside Walkway connecting Wolfe Tone and the Salmon Weir bridges.</p> <p>In the absence of specific noise control objectives, developments can be carried out individually or in combination which will gradually erode the unique recreational value of the soundscape that exists on the Riverside Walkway.</p> <p>A specific objective should be inserted into the plan that requires an adequate impact assessment of development led noise on the amenity to protect the amenity in the future.</p> <p>Policy 5.3.21 is suggested by the author under Blue Spaces: Coast, Canals and Waterways to read: "Ensure the conservation of the special recreational value of the riverside walk from Wolf Tone Bridge to Salmon Weir Bridge and require that developments abutting the walkway do not have adverse impacts on the soundscape".</p> <p>The enjoyment of the soundscape has potential to be a key part of the experience of the city for the community and visitors.</p> <p>The heading title for section 5.7.3 of the plan should be amended to add "and Areas" to read, Views and Areas of Special Amenity Value and Interest.</p> <p>A table is also suggested- 5.10 Protected Soundscape Amenities (Table Name) to be added to the plan. Soundscape Amenities (Heading) S1- The river and millrace soundscape from the Wolf Tone Bridge to the Salmon Weir Bridge.</p>	<p>The Council recognise the unique and special recreational value of the Riverside Walkway and concur with the submission in relation to its special character.</p> <p>Section 9.8 Noise recognises that within the busy city environment, there are areas which can provide respite from the high level of urban noise. Quiet areas, which are areas which have lower sound levels, can be important places for rest and quiet contemplation in the city's environment and can have a positive impact on quality of life and wellbeing.</p> <p>CE Recommendation</p> <p>Amend Policy 5.3. Blue Spaces: Coast, Canals and Waterways and insert no. 21 – text in green</p> <p>21. Ensure the conservation of the special recreational value of the riverside walk from Wolfe Tone Bridge to Salmon Weir Bridge and require that developments abutting the walkway incorporate measures to minimise noise levels in their design and reduce the emission and intrusion of any noise which might have potential to adversely impact on amenities and quiet space attributes.</p>
GLWC-C2-41 Peter Brennan	<p>50 meter swimming pool at NUI Galway</p> <p>Need to provide a 50-meter swimming pool facility at NUI Galway to support the development of Connacht swimming.</p>	<p>CE Response</p> <p>It is noted that the NUIG submission did not highlight the need for such a facility. The Greenspace Strategy will include a review of recreation</p>

	<p>See also attachment outlining a Sport England funded swimming pool facility.</p>	<p>facilities to establish the needs for the city and will allow for consideration of recreational needs including swimming pools.</p> <p>The draft plan includes a specific objective in Section 5.10 no. 27 Develop a Community Centre/ Sports Hall, a swimming pool with associated ancillary facilities on a phased basis adjoining and linked with the existing changing rooms at Doughiska on RA zoned lands.</p> <p>There is also a specific objective on RA lands at Cappagh Park for consideration of the development of an Aquatic centre (Chapter 11).</p>
GLWC-C2-32 Save Roscam Peninsula	<p>Impact of proposed greenway in Roscam</p> <p>The inclusion of the indicative greenway route on the Roscam Peninsula is contrary to recommendations of the Department.</p> <p>Indicative route is within and adjacent to protected sites and with a registered monument site. Reference to p.135 of Draft Plan - 'such routes will only be developed within and adjacent to European Sites where it can be shown there will be no adverse impacts upon the integrity of the sites as defined by their conservation objectives'</p> <p>Construction of a greenway and ancillary services will increase pressure on protected sites. Alternative routes should be considered.</p> <p>The section of the Indicative Greenway Cycle Network on Map A of the plan which is shown to go all around the Roscam Peninsula should be changed from a Cycle Path to an environmentally sensitive Natural Coastal Walkway.</p> <p>A walkway at this location would also give optimal access the Roscam Monastic site area, without causing damage that would occur if a cycleway was constructed here.</p> <p>A wood based, environmentally walkway at this location could incorporate nature based solutions to slow the dramatic</p>	<p>CE Response</p> <p>The plan acknowledges in Section 5.71 Greenways, Boreens and Public Rights of Way, that in order to conserve and protect sensitive ecological areas, <i>greenway routes may need to be restricted or redirected to less sensitive areas. In this regard, the routes of proposed greenways shown on accompanying Development Plan maps are indicative only.</i></p> <p>The draft plan further states that <i>proposed greenways will be subject to a route selection process, which will take cognisance of site-specific circumstances including consideration of ecological and environmental sensitivities. Such routes will only be developed within and adjacent to European Sites where it can be shown that there will be no adverse impacts upon the integrity of the sites as defined by their conservation objectives.</i></p> <p>Policy 5.2 Protected spaces: Sites of European, National and Local Ecological Importance is an important safeguard ensuring protection of European sites and requiring that all such projects will be subject to screening and appropriate assessment. There is also a range of other policies in the draft plan which actively protect, conserve and enhance sites</p> <p>With regard to the objective for a greenway route at Roscam, it is recommended that the indicative route as mapped be retained in the draft plan for the present, and that text of Section 5.7.1 be embellished to address the concerns of various submissions. The preferred national greenway route option is scheduled to be finalised in Q4 2022. In the event</p>

	<p>erosion occurring along the whole Roscam Peninsula Coastline.</p> <p>The route should be removed from the draft plan pending the completion of the ongoing public consultation process on the Athlone-Galway greenway.</p> <p>Submission claims that the inclusion of the indicative route is contrary to the Aarhus Convention as the public consultation process is ongoing.</p>	<p>that this proposes an alternative route, the current objective can be examined. A default option would be to retain the objective for the route to function as an informal walking trail which would support the objectives of the plan in terms of enhancing recreational amenity and accessibility to the coastline of this part of the city. It is recommended that the text of Section 5.7.1 be amended to reflect this.</p> <p>CE Recommendation</p> <p>Amend Section 5.7.1 Greenways, Boreens and Public Rights of Way- insert text in green after the 3rd paragraph as follows:</p> <p>The plan acknowledges that in order to conserve and protect sensitive ecological areas, greenway routes may need to be restricted or redirected to less sensitive areas. In this regard, the routes of proposed greenways shown on accompanying Development Plan maps are indicative only. Proposed greenways will be subject to a route selection process, which will take cognisance of site-specific circumstances including consideration of ecological and environmental sensitivities. Such routes will only be developed within and adjacent to European Sites where it can be shown that there will be no adverse impacts upon the integrity of the sites as defined by their conservation objectives.</p> <p>In particular, the section of the indicative coastal greenway route between Ballyloughane and the eastern city boundary will be further considered following the establishment of the National Galway to Dublin greenway preferred route option which is due to be finalised in Q4 2022.</p> <p>In the event that this preferred national route option differs in alignment to the Galway City Council mapped indicative greenway route, the objective will not continue to accommodate a cycle route but will be to provide solely for an informal walking greenway route.</p>
GLWC-C2-57 Fort Lorenzo Residents Association	<p>Right of Way - Fort Lorenzo</p> <p>Submission requesting that a pedestrian right of way is established from Carraig Ard, Fort Lorenzo through Cuan na Coille, Fort Lorenzo to the Bishop O'Donnell Road at the point</p>	<p>CE Response</p> <p>This issue has arisen in response to the installation of lockable gates at two existing pedestrian access points at Cuan na Coille, a residential</p>

	<p>where existing pedestrian entrances exist, approximately 40m from the traffic lights. This will provide access to/from Bar Na Carriage, Carraig Ard & Bru Na Mara. Route was previously accessible until gates were erected 12-24 months ago.</p>	<p>development. This matter is outside the scope of the development plan. It is currently being investigated as an enforcement issue.</p>
GLWC-C2-85 East of the Corrib: Terryland-Castlegar-Ballinfoile Community Stakeholders GLWC-C2-127 Roselyn Carroll	<p>Improve connection and permeability - Ballinfoile/Ballinfoile Castlegar Neighbourhood Centre</p> <p>Provide for safe active travel, walking and cycling between Castlegar Village and National School and Ballinfoile/Ballinfoile Castlegar Neighbourhood Centre (BCNC).</p> <p>Restore and enhance local boreens as important connectivity channels for young children from Castlegar to get from school to Ballinfoile Castlegar Neighbourhood Centre.</p> <p>Deliver permeability between Bóthar An Chóiste and the Boreen to the South East of the residential estates which should connect to the BCNC and onto Sandy vale amenity routes.</p> <p>Open gates that are locked that connect to estates along Bóthar An Chóiste and the Boreen it adjoins.</p> <p>Connect Crestwood pitches/ recreational areas to the various estates in the area making the area more accessible to all and providing families with a safe area to walk. Improve connections to existing amenities and facilities in our community.</p> <p>Develop facilities at Crestwood pitches including proper changing rooms.</p>	<p>CE Response</p> <p>Many of the issues raised are already included as part of the policy framework in the draft plan. Specifically policies and objectives in Chapter 3 and Chapter 5 provide for a network of greenways and boreens in the city. Section 5.7.1 refers specifically to Greenways, Boreens and Public Rights of Way and policy support is included in Policy 5.5.</p> <p>The designated greenway along the northern boundary of the Terryland RA lands connects Castlegar with the Ballinfoile/Ballinfoile Castlegar Neighbourhood Centre.</p> <p>The draft plan supports the submission in relation to achieving permeability. A key aspect of the sustainable neighbourhood concept and the 15 minute concept is to have good connectivity and linkages between residential areas and local services including schools and shops.</p> <p>With regard to locked gates, the policy framework is in place in the draft plan to support access and connectivity, it is outside the scope of the plan to direct the opening of specific gates. This is a matter for further investigation, it may require negotiation with a land owner or may be a specific operational issue for the Recreation and Amenity Section. The matter is referred to Recreation and Amenity Section for their review.</p> <p>The Greenspace Strategy will review existing open space areas and consider all opportunities to improve linkages and connectivity. Similarly, it will consider the need for additional recreation and amenity facilities including facilities at Crestwood.</p>
GLWC-C2-148 Galway City	<p>Social Inclusion</p> <p>Include policy with regard to collaborative mapping of recreational areas, to facilitate an education and awareness</p>	<p>CE Response</p> <p>These issues are noted and many are addressed in the draft plan. Accessibility and equal access is a central tenet of the draft plan and is</p>

Community Network	<p>raising programmes and public engagement in relation to in the protection of the natural heritage.</p> <p>Include policy with regard to implementing measures to ensure accessibility and equal access to the Green and Blue Network for all communities in the city regardless of location or ability.</p> <p>Implement measures to connect the network with an accessible and sustainable public transport network.</p> <p>Implement targeted access measures to outdoor spaces that enhance emotional and mental health of disabled people.</p> <p>Ensure that additional spaces will be allocated in existing and new neighbourhoods for community gardens which are accessible through universal design principles.</p>	<p>reflected in the strategic vision and specifically in strategic goal number 4 which is to make Galway an equal and inclusive city.</p> <p>Various policies in the draft plan give support. Policy 5.1 includes to improve accessibility to the City Parks, recreation and amenity areas and facilities and include for sustainable modes of transport, where appropriate.</p> <p>The plan recognises the value of the green network in terms of health and well being of all including those with a disability. Policy 5.1 Green Network and Biodiversity includes to retain, extend and enhance opportunities for recreation within the green network for all members of the community including people with disabilities. Specific measures and initiatives are being advanced under the recreation and amenity annual service delivery plan and work programme such as the health green spaces and provision of age friendly facilities which support accessibility. It is envisaged that the green space strategy will also address accessibility issues in the green network. Measures to raise awareness and educational programmes are being advanced by the council under operational work programmes associated with the Recreation and Amenity Section, the Heritage Officer and the Environment Section.</p> <p>Chapter 3 Section 4.6 also includes for ensuring accessibility as part of the whole journey approach and includes in Policy 4.6 Road and Street Network and Accessibility to promote accessibility for people with disabilities and people with reduced mobility and have regard to best practice guidance from the National Disability Authority (NDA).</p> <p>Chapter 7 also has a range of policies to support accessibility and equal access including Section 7.3 Inclusive City.</p> <p>The draft plan also supports the implementation of the Public Realm Strategy and central to this strategy is the promotion of universal design in city centre urban and civic spaces.</p> <p>With regard to allotments, Policy 5.8 Community Spaces: Allotments, Community Gardens and Cemeteries, includes to continue to provide and facilitate allotments and community gardens in the city.</p>
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GLWC-C2-81 Noonionbmx GLWC-C2-219 Ibai Gantxegi-Siles GLWC-C2-35 Maja Pawlik	<p>Skateboarding facilities</p> <p>Skateboarding also has many benefits including improved health, improving coordination, flexibility and relieves stress.</p> <p>Galway City needs facilities like spacious transition skateparks, street style plaza skateparks, concrete skateparks with the possibility to skate ramps and more street like obstacles.</p> <p>Galway City has three very near unusable skateparks, Millennium, Westside and Doughiska skateparks.</p> <p>Provide skate facilities close to the city centre as existing facilities in Westside and Knocknacarra are not easily accessible to everyone.</p> <p>Consult with Galway Skateboard Association regarding the provision of skating facilities.</p>	<p>CE Response</p> <p>Policy 5.6 Community Spaces: Child Friendly City, includes to enhance the provision of facilities for older children and teenagers within the city, including skateboarding areas, teenage shelters, ball walls and Multi Use Games Areas (MUGAs).</p> <p>The Greenspace Strategy will identify the need and locations for a range of facilities to address the needs of young people such as skateboarding facilities. Consultation with the public and stakeholders will be part of the preparation of the strategy.</p> <p>Chapter 11 Table 11.2: Indicative Examples of Recreational Facilities for Different Sizes of Residential Developments includes for such facilities including skateboarding.</p> <p>The Greenspace Strategy will identify the need and locations for a range of facilities to address the needs of young people. Consultation will be part of the preparation of this strategy.</p>
GLWC-C2-124 Titans Basketball Club	<p>Outdoor Basketball Court at Toft Park</p> <p>Toft Park is an ideal location for an outdoor Basketball Court or alongside the Playground at the Aquarium.</p> <p>Titans has hundreds of children and adults from around Salthill who have no access to play outdoor basketball when the school are closed for weekends, evenings or holidays.</p> <p>No consultation has ever taken place in relation to provision of such facilities.</p>	<p>CE Response</p> <p>The Greenspace Strategy will identify the need and locations for a range of facilities to address the needs of young people and adults such as basketball facilities.</p> <p>Consultation with the public and stakeholders will be part of the preparation of the strategy.</p>

GLWC-C2-201 Galway City Alcohol Forum GLWC-C2-202 Galway City Early Years sub- committee of CYPSC	Local Needs-Recreation and Play Areas Consider local needs and ensure that recreation and play areas are part of each neighbourhood for all age groups from 0 years upwards. Amend Policy 5.6 Community Spaces – Child Friendly City to include to ensure the City Development plan supports the implementation of Galway Children and Young People's Plan and To foster the development of sport, recreation and amenities that are free from alcohol and combat exposure of children to alcohol marketing in public places.	CE Response The draft plan supports the provision of recreation and play areas with policy support in Chapter 5, Chapter 3 – sustainable neighbourhood concept and Chapter 7 community facilities. Chapter 11 Table 11.2: Indicative Examples of Recreational Facilities for Different Sizes of Residential Developments includes for a variety of facilities. The Greenspace Strategy will identify the need and locations for a range of facilities to address the needs of all age groups. With regard to amendments to Policy 5.6 Community Spaces: Child Friendly City, no change is recommended. The Galway Children and Young People's Plan 2021 – 2023 is a specific plan for the Galway Children and Young People's Services Committee and solely within their remit. With regard to marketing and alcohol, while the council would concur with the sentiment of the policy, it is outside of the scope of a land use development plan to influence marketing of alcohol in public places.
GLWC-C2-189 Galway National Park City initiative GLWC-C2-187 Brendan Smith	Community Gardens and Allotments To promote locally grown organic food and responsible consumption by providing space for community organic gardens and allotments in neighbourhoods and business parks across the city.	CE Response The draft plan supports this request. Allotments and community gardens are acceptable uses on a number of land use zones and the Council will continue to provide and facilitate allotments and community gardens in the city. Specific policy is set out in Policy 5.8 Community Spaces: Allotments, Community Gardens and Cemeteries.
GLWC-C2-140 Ronan Duke GLWC-C2-166 Karl Flannery	Coolough Boreen should be zoned as a Recreational Greenway The Coolough Boreen/mass-path has been zoned as LDR on the city map. This boreen/mass path is hundreds of years old and from the point of amenity. This path is used daily by many locals linking, as it does, Coolough village with the Ballinfoile area.	CE Response A number of roads, paths and boreens on the Land Use Zoning and Specific Objectives map are within particular land use zones. All of these do not require specific protection or designation to retain their function. The draft plan and map does not include a specific landuse zone for roads or paths/boreens and does not have a recreational greenway zoning. The zoning at this location does not preclude or prohibit the use of the boreen/mass path.

	<p>Request it be zoned as "Recreational Greenway" in acknowledgement of both its current amenity and its heritage.</p>	<p>Section 5.7.1 and Policy 5.5 supports the use of boreens in the city for passive recreation, active travel and for the promotion of linkage to the green network. These can also be protected in the development management process where there is an objective to maximise permeability and linkage in layouts</p> <p>There is an opportunity as part of the advancement of the next stages of the Public Rights of Way inventory to examine these and classify them as public rights of way.</p>
GLWC-C2-229 Friends of Merlin Woods GLWC-C2-127 Roselyn Carroll	<p>Policy 5.5 Community Spaces: Greenways, Boreens and Public Rights of Way</p> <p>Amend policy 5.5.7</p> <p>Create, enhance and maintain accessible and safe public rights of way, where appropriate for pedestrian convenience, including public lighting where appropriate. Excluding local and important biodiversity sites where species inhabiting it rely on the continuation of dark zone</p> <p>Policy 5.5.8 - Include slow zones through woodlands.</p> <p>Delivery a registry of RA Greenways in the City. Include properties & characteristic of RA greenway routes in registry. Deliver an action plan on the management, development and delivery of access to such routes to the public. Put to SCP and community for collaboration. Aim to deliver a joined-up network of RA Greenways.</p>	<p>CE Response</p> <p>Policy 5.5. Community Spaces: Greenways, Boreens and Public Rights of Way no. 7 includes for the inclusion of public lighting "where appropriate". To add on extra text as suggested is not deemed appropriate or necessary.</p> <p>Policy 9.7 Light Pollution includes to ensure the design of external lighting minimises the incidence of light pollution, glare and spillage into the surrounding environment; to ensure that Lighting on linear infrastructures, including greenways and blueways, should be carefully managed to ensure coherence of the supporting habitats of European sites, as outlined in Article 10 of the Habitats Directive and to ensure the design of external lighting does not have an adverse impact on wildlife and ecosystems and encourage the use of dark zones and sensor lighting where feasible.</p> <p>The Council support the accommodation of slow zones through woodlands, however this is a more appropriate to be considered as part of the ongoing masterplans for city woodland parks.</p> <p>It is not a matter for the development plan to have a register of greenways.</p>
GLWC-C2-186 Galway Archers	<p>Consider the provision of dedicated archery facilities in the development of new sports facilities. Need for a permanent, open-access archery facility that would permit year-round indoor and outdoor practice.</p>	<p>CE Response</p> <p>The Greenspace Strategy will identify the need and locations for a range of facilities in the city.</p>

<p>GLWC-C2-187 Brendan Smith</p> <p>GLWC-C2-171 Roselyn Carroll</p>	<p>Ecological Corridors, Greenways and Boreens</p> <p>To develop a 'boreen' public walking route network that is an area of high biodiversity (hedgerows, drystone walls, surrounded by natural/rural green/blue spaces) commencing at the Woodquay Plots connecting on to Coolough, Menlo, Castlegar, Parkmore, Ballybrit and other areas of the city that have strong rural characteristics.</p> <p>Create a city-wide looped ecological corridor linking to Terryland as a central hub.</p> <p>To develop an ecological-sensitive river walk from Terryland Castle to Menlo Castle</p> <p>To ensure that the Dyke Road-Terryland Forest Park area becomes a green and blue hub of national and international importance for walking, cycling and an area of high biodiversity</p>	<p>CE Response</p> <p>Section 5.7.1 and Policy 5.5. Community Spaces: Greenways, Boreens and Public Rights of Way supports the use of boreens in the city for passive recreation, active travel and for the promotion of linkage to the green network.</p> <p>Policy 5.2 Protected Spaces: Sites of European, National and Local Ecological Importance, provides for the protection of wildlife corridors and stepping stones and to prevent habitat fragmentation.</p> <p>The draft plan also refers to the value of road verges as linear green corridors and that off road routes should incorporate nature based and biodiversity features to support wildlife corridors and connections to the green network (p73). Also in support of connectivity is Policy 5.1 Green Network and Biodiversity which includes to continue to implement measures to increase and restore biodiversity in open spaces and road verges.</p> <p>The draft plan supports the Biodiversity Action Plan. It also seeks to identify any additional wildlife corridors and stepping stones which are of high value and merit in the green network.</p> <p>The draft plan includes a riverside walk from Terryland to Menlo.</p> <p>The advantageous location of Terryland/Dyke Road proximate to the greenway and blueway network is recognised. The preparation of a Local Area plan for the Headford Road area will investigate the potential for development of a green and blue hub at this location adjoining Terryland Forest park.</p>
<p>GLWC-C2-228 Galway Environmental Network</p>	<p>All-weather playing pitches</p> <p>Take into account the impact of the resulting loss of carbon sequestration when proposals are made to replace grass playing surfaces with all-weather artificial surfaces.</p>	<p>CE Response</p> <p>This will be a matter for the Local Authority Climate Action Plan where mitigation measures will be included for.</p>

<p>GLWC-C2-123 Owen Hanley</p>	<p>Doughiska Greenway Connectivity</p> <p>Proposals to deliver greenway connectivity for Ballybrit, Doughiska and Roscam to the Galway to Dublin Greenway should be developed.</p>	<p>CE Response</p> <p>This is noted. The draft plan supports the submission in relation to achieving connectivity including greenway connectivity. A key aspect of the sustainable neighbourhood concept and the 15 minute concept is to have good connectivity and linkages. Such proposals will be considered once the preferred route option of the Galway to Dublin Greenway has been established.</p>
<p>GLWC-C2-173 Galway Cycling Campaign</p>	<p>Suggested amendment to section Policy 5.5 Community Spaces: Greenways, Boreens and Public Rights of Way and Public Rights of Way, p136:</p> <p>From: “5. Provide controlled access and linkages into all parks/public open spaces, areas of natural heritage, including along waterways, where it can be demonstrated that there will be no adverse impacts on the integrity of European sites.”</p> <p>To: “5. Provide access and linkages into all parks/public open spaces, areas of natural heritage, including along waterways, with appropriate controls for access to natural habitats to ensure that there will be no adverse impacts on the integrity of European sites.”</p> <p>Rationale</p> <p>It is not clear what is meant by access controls (timed opening and closing of gates or physical controls that enable some users to access/egress but not others). Access controls often exclude bone fide users of outdoor and green amenities such as those with mobility impairments, those using larger wheelchairs, mobility scooters, double-buggies or those using larger, non-standard cycles.</p> <p>The explicit requirement in this policy for access controls could be in direct contradiction to the stated policies and objectives of the draft plan relating to permeability and universal access as it relates to the Barcelona Declaration</p>	<p>CE Response</p> <p>The matter of access to parks is currently under review by the Recreation and Amenity Section as a part of their operational work programme. They are in the process of working on a combined review with the NTA team in the Transport Section and Housing and Social Inclusion to come up with an appropriate alternative design for kissing gates in the City in order to maximise permeability.</p>

	<p>and the UN Charter of Rights for People with Disabilities. The recent circular issued by Transport Infrastructure Ireland and the National Transport Authority to remove the use of access controls on walking and cycling routes. Where environmental concerns exist about impact on natural habitats, then the consideration should be whether any access is given, rather than excluding some users in favour of others.</p>	
GLWC-C2-230 Dept. Housing, Local Government and Heritage	<p>Policy 5.8 Community Spaces: Allotments, Community Gardens and Cemeteries</p> <p>Include a policy objective to protect historic graveyards and to ensure appropriate management and maintenance of those in the ownership or care of the local authority.</p>	<p>CE Recommendation</p> <p>Amend Policy 5.8 Community Spaces: Allotments, Community Gardens and Cemeteries- include text in green as follows:</p> <p>3. Protect historic graveyards within the city and ensure appropriate management and maintenance of those in the ownership or care of Galway City Council.</p>
GLWC-C2-230 Dept. Housing, Local Government and Heritage	<p>Policy 5.5 Community Spaces</p> <p>Amend Policy 5.3 and policy 5.5 in relation to Greenways and Blueways to include that they are subject to route/site selection processes to ensure that impacts to biodiversity and nature conservation interests are avoided and that appropriate environmental assessments are undertaken in relation to all projects. [Also applicable to Policy 5.3 Blue Spaces]</p>	<p>CE Response</p> <p>Section 5.7.1 states in relation to greenways that they will be subject to a route selection process, which will take cognisance of site-specific circumstances including consideration of ecological and environmental sensitivities. It states that such routes will only be developed within and adjacent to European Sites where it can be shown that there will be no adverse impacts upon the integrity of the sites as defined by their conservation objectives. This is considered sufficient to address the issue raised for Greenways. It is considered appropriate to include similar text in relation to Blueways.</p> <p>CE Recommendation</p> <p>Amend Section 5.5.2 Rivers, Canals and Waterways and insert additional text after the 3rd paragraph – set out in green text as follows:</p> <p>Proposed blueways will be subject to a route selection process, which will take cognisance of site-specific circumstances including consideration of ecological and environmental sensitivities. Such routes will only be</p>

		developed within and adjacent to European Sites where it can be shown that there will be no adverse impacts upon the integrity of the sites as defined by their conservation objectives.
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5.8 - Open Spaces

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-42 OPW	Open Spaces policy Welcomes Policy 5.10 Open Spaces: Agricultural Lands, restrict development within 10m of the river Corrib in 'G' agricultural zoned lands	CE Response Noted
GLWC-C2-123 Owen Hanley	Ballybrit - Recreation and Amenity Open Space The Ballybrit area should also be given more consideration, the Council should include a policy to investigate the potential to develop recreation and amenity open space.	CE Response Noted. The Greenspace Strategy will include a review of all open space to establish the existing provision and where deficiencies exist, in all areas of the city including Ballybrit.

5.10 - Specific Objectives

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-19 Merlin Woods Allotment Association	Specific Objective 5.10.32 - Facilities and services in public spaces Strengthen Specific Objective 5.10.32 to state that 'public toilets will be provided in or in close proximity	CE Response It is considered appropriate to strengthen the objective to facilitate public toilets in the draft plan.
GLWC-C2-123 Owen Hanley		CE Recommendation

	<p>to public parks and open spaces and along the coast and waterways'</p> <p>The submission by the Merlin Woods Allotment Association to strengthen policy 5.32 is with great merit and should be strongly considered</p>	<p>Amend Section 5.10 Specific Objectives and insert additional text in green and omit text using strikethrough as follows:</p> <p>32. Investigate the potential of providing services, for example kiosks, public toilets and food trucks, in or in close proximity to public parks and open spaces and along the coast and waterways</p> <p>33. Seek to provide public toilets, in or in close proximity to public parks and open spaces and along the coast and waterways</p>
GLWC-C2-201 Galway City Alcohol Forum GLWC-C2-230 Dept. Housing, Local Government and Heritage	<p>Include to Specific Objective</p> <p>5.10 Specific objectives to include - Facilitate the development of physical environments which are conducive to promoting the healthier choice as the easier choice and support the implementation of the goals and objectives of the Healthy Galway City Strategy.</p> <p>Policy 5.10 Agriculture should also include to support conservation objectives of lands within Designated Sites for nature conservation Natura 2000 (SAC/SPA) and NHA sites.</p>	<p>CE Response</p> <p>It is considered that the draft plan policy framework around the green network, sustainable neighbourhoods and active travel supports making the healthier choice as the easier choice. This is also reflected in the strategic goals of the draft plan (number 6).</p> <p>Policy 7.3 Includes to Support the participation of the city in the National Healthy Cities and Counties of Ireland Network and the implementation of the Healthy Galway City Strategy 2019- 2021</p> <p>With regard to support of conservation objectives, this is more appropriately located in Policy 5.2 Protected Spaces: Sites of European, National and Local Ecological Importance.</p> <p>CE Recommendation</p> <p>Amend Policy 5.2 Protected Spaces: Sites of European, National and Local Ecological Importance, No. 9 by the inclusion of text in green as follows:</p> <p>Co-operate with the NPWS, landowners and stakeholders in the preparation and implementation of management plans for designated sites and support conservation objectives of lands within Designated Sites for nature conservation Natura 2000 (SAC/SPA) and NHA sites.</p>
GLWC-C2-229 Friends of Merlin Woods	Merlin Castle	CE Response

	<p>Add in section 5.10 Specific objectives: Promote the conservation/restoration and upgrading of Merlin Castle for use as a biodiversity and heritage hub with community use for Galway East in line with the policies for protection of our high biodiverse green spaces and heritage areas.</p>	<p>The draft plan includes specific objectives in relation to Merlin Castle in Chapter 5 and Chapter 8.</p> <p>Section 5.10 Specific Objectives No. 12 states to <i>Explore the potential for developing lands adjacent to Terryland Castle, Merlin Castle and Menlough Castle for public realm and landscaping to enhance the context of the Castles.</i></p> <p>Section 8.10 includes to progress implementation of Conservation Management Plan recommendations for Merlin Castle, Terryland Castle and Menlough Castle.</p> <p>In this regard, it would not be appropriate to assign uses to the castles which may not accord with their conservation management plans and which would require consent from the National Monuments Service.</p>
GLWC-C2-229 Friends of Merlin Woods	<p>Food Trucks</p> <p>Relating to specific objective 5.10.32</p> <p>Food trucks should only be allowed at special events, they may cause disturbance and noise in a peaceful setting , they may impact local business, they will increase litter and without full-time litter management , it is unfair to expect volunteers to clean up further litter</p>	<p>CE Response</p> <p>This submission is noted. Section 5.10 Specific Objective number 32 states to: Investigate the potential of providing services, for example kiosks, public toilets and food trucks, in or in close proximity to public parks and open spaces and along the coast and waterways.</p> <p>A range of services can add to the accessibility and enjoyment and vitality of spaces and should not be prohibited.</p> <p>The council recognise the potential nuisance issues referred to but consider that the provision of services such as food trucks could be accommodated in certain circumstances outside of special events subject to an appropriate management regime in place. It is considered that the wording of the specific objective which is to investigate the potential of providing services is a sufficient safeguard. Licences/permissions are required for food trucks which require that certain conditions are met in terms of litter, waste management and noise.</p>

GLWC-C2-229 Friends of Merlin Woods	<p>Quarry House</p> <p>Partially reserve Merlin Park lands acquired with Quarry house for local biodiversity and zone appropriately as they form part of existing woodland and are of geological importance with wildlife species of interest including Orchids , Bird of Preys and historical habitats. Any housing should be in areas that do not impact this area.</p>	<p>CE Response</p> <p>These lands are zoned for residential use and detailed requirements are set out in Chapter 11, Figure 11.9 Merlin Park Lane, Doughiska Road which includes for the retention of trees and hedgerows and additional planting. It requires that development shall have regard to County Geological Site.</p> <p>These are criteria which are necessary considerations in the design and layout of any emerging proposal.</p> <p>These will be assessed as part of the development management process.</p>
GLWC-C2-229 Friends of Merlin Woods GLWC-C2-127 Roselyn Carroll	<p>Section 5.10 Specific Objectives</p> <p>Short Term: Investigate and plan for restoration of Merlin River</p> <p>Long Term: Ensure water flows through Merlin Woods to ensure no further loss of wildlife species which depend on it for their survival.</p> <p>Amend objective: 5.10.12</p> <p>Explore the potential for developing lands adjacent to Terryland Castle, Merlin Castle and Menlough Castle for public realm and landscaping to enhance the context of the Castles while protecting the existing habitats and in keeping with heritage of the area.</p> <p>Replace term 'explore' with 'Carry out in collaboration with the public and deliver a plan for the development of lands for the castles as amenities.</p>	<p>CE Response</p> <p>With regard to a plan for restoration of Merlin River and ensuring water flow. It is considered that this should be addressed under the proposed Merlin Park Woods masterplan and may require cross directorate consideration.</p> <p>The wording of the specific objective in relation to the castles is considered appropriate. Amended wording to the specific objectives for the castle is not considered warranted. Enhancing the context of the castle is a key element of protecting the existing heritage. A public realm design strategy is being prepared for peripheral areas of Merlin and Tirellan Castle. The objective of this is to give guidance on future investment in the contextual settings of these monuments in the interest of improving the historical interpretation, linkages and awareness of these historic legacies. With regard to habitats, this wording is not considered appropriate as the value of existing habitats have not been established and it is considered that there is already sufficient policy in the plan to ensure protection of habitats.</p> <p>It is not recommended to include as a short term objective, these are ongoing projects that are subject to annual funding applications and their delivery will be longer than short term and involve collaboration with a number of stakeholders.</p>

<p>Move specific objective 5.10.no 12 from a Medium/long term objective to a Short Term objective</p> <p>Amend objective 5.10.14</p> <p>Retain car parking of approximately 30 car parking spaces for amenity purposes east of Merlin Park Woods at Doughiska if they do not impede on the entrance to Merlin Park Woods and community garden area.</p> <p>Amend objective 5.10.38</p> <p>Progress the acquisition of lands for recreation and amenity purposes, and other lands which will enhance the extent of the green network, in particular key linkages and lands for active and passive recreation. Lands purchased by city council of existing Merlin Woodlands which was previously owned by private owners should be safeguarded for this purpose, it is already utilised by people in the community as a walk-through woodland to the quarry, it is also an important area for our wildlife and would help to negate loss of land on Dublin R due to bus corridor.</p> <p>Amend objective 5.10.39</p> <p>Acquire and develop predominately for public use, lands zoned for recreation and amenity use in conjunction with new housing at Castlegar, Doughiska, Terryland Valley, Ballymoneen, Knocknacarra, Roscam and Ardaun. Important to create connecting wildlife corridors for Merlin Woods , any green spaces should be of adequate</p>	<p>Amended wording to the specific objectives 5.10.14 in relation to car parking spaces is not considered warranted. Obstruction of entrances by car parking is outside the scope of the plan and an operational matter.</p> <p>Amended wording to the specific objectives 5.10.38 in relation to acquisition of lands at Merlin lane is not considered appropriate. These lands are zoned for residential use and detailed requirements are set out in Chapter 11, Figure 11.9 Merlin Park Lane, Doughiska Road which includes for the retention of trees and hedgerows and additional planting. It also requires that development shall have regard to County Geological Site.</p> <p>Amended wording to the specific objectives 5.10.39 in relation to acquisition of lands is not considered appropriate. The policy framework for the green network supports connectivity and habitat protection and Chapter 11 sets standards for provision of open space and permeability in developments.</p>
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	size within developments and again old scrubland should be retained	
GLWC-C2-202 Galway City Early Years sub- committee of CYPSC	<p>Low cost play</p> <p>Include in 5.10 Specific objectives - Facilitate the development of accessible and low cost indoor and outdoor play spaces for children and families of all ages including 0-3 years.</p>	<p>CE Response</p> <p>The submission is noted and while there is support for low cost play, it is outside of the scope of the development plan to enforce specific charges to be applied to privately controlled play spaces.</p> <p>The draft plan has existing support for provision of play spaces for all age groups.</p>
GLWC-C2-123 Owen Hanley	<p>Amendment to Specific Objective 5.10.31 for Terryland Pedestrian Bridge</p> <p>On objective 5.10.31 for a walkway along the northern part of the Terryland river, pedestrian bridge should connect to the proposed river walk, this should also be an opportunity to enhance pedestrian and cycling connectivity between the Headford Road and Tuam Road. This could provide walking and cycling connections between Bóthar an Choiste, Ballinfoile Community Garden, Riverside and the further Sandy Road development. The potential of an active travel bridge over the N6 should be included.</p>	<p>CE Response</p> <p>The Land use and specific objectives maps show the designated greenways and how they link together and link in with the cycle network. The greenway along the northern boundary of the RA lands at Terryland links with the Terryland riverside greenway which in turn links to the Dyke road and the greenway along the river and which connects to the proposed pedestrian bridge. They also connect with Bóthar an Coiste. The Council will continue to investigate opportunities for connections such as through the LDA Sandy Road development. The Greenspace Strategy will consider opportunities for connections in and between open spaces also.</p> <p>The potential of an active travel bridge over the N6 will be a consideration of the Greenspace Strategy and could be included as part of the GTS review. It would be premature to include it as a specific objective in the draft plan without any consultation with key stakeholders such as TII and NTA and land owners.</p>
GLWC-C2-123 Owen Hanley	<p>Merlin Woods- Specific Objective 5.10.12 Proposed Amendment</p> <p>Merlin Woods represents a significant high quality green space, unique in the city's urban environment. The biodiversity, recreation and heritage value of</p>	<p>CE Response</p> <p>As stated in response to previous submissions, the wording of the specific objective in relation to the castles is considered appropriate. Amended wording to the specific objectives for the castle is considered superfluous.</p> <p>The existing specific objective is sufficiently broad to allow for the potential to develop lands for public realm and landscaping in the vicinity of the</p>

	<p>Merlin Woods for the local community cannot be overstated.</p> <p>Objective 5.10.12 on Page 142:</p> <p><i>"Explore the potential for developing lands adjacent to Terryland Castle, Merlin Castle and Menlough Castle for public realm and landscaping to enhance the context of the Castles."</i></p> <p>Should be re-written to:</p> <p><i>"Develop the public realm and landscaping of lands adjacent to Terryland Castle, Merlin Castle and Menlough Castle to enhance the context of the Castles and to conserve their position within their local environments."</i></p>	<p>castles over time subject to grant funding from different funding streams. This is an ongoing process. Currently a public realm design strategy is being prepared for peripheral areas of Merlin and Tirellan Castle. The objective of this is to give guidance on future investment in the contextual settings of these monuments in the interest of improving the historical interpretation, linkages and awareness of these historic legacies for all and will undoubtedly, as works to date have demonstrated, enhance the local environment.</p>
GLWC-C2-173 Galway Cycling Campaign	<p>Providing green infrastructure linking Renmore to city - New Specific Objective Proposed</p> <p>Proposed addition of new specific objective to 5.10 Specific Objectives, p. 142:</p> <p>Add: "Provide for a connection from the existing path north of the railway embankment at Lough Atalia to link through to the harbour lands using the existing underpass/tunnel under the railway embankment,"</p> <p>Photo of the existing access to Renmore/Lough Atalia under the railway embankment at the harbour lands submitted as part of submission.</p>	<p>CE Response</p> <p>This specific objective is not recommended at this time, a detailed assessment of this proposed route would be required which will require time and resources to complete and cannot be done within the short timescale of this stage of the development plan. It is also considered that additional greenway connections will be considered as part of the Greenspace Strategy and it would be appropriate to consider it as part of that strategy. The GTS review will also include consideration of active travel routes.</p>

Chapter 5: Natural Heritage, Recreation and Amenity CE Recommendations

1. Amend Section 5.2 Green Network 2nd paragraph to include text in green as follows:

The green network approach seeks to manage and protect the environment and in doing so, meet the requirements of a number of European Directives including Habitats, Birds, Water Framework and Floods Directives. It also supports the EU Biodiversity Strategy for 2030 which sets out a comprehensive framework of commitments and actions to tackle the main causes of biodiversity loss. At national level it lends support to the *National Biodiversity Action Plan 2017-2025*, *National Landscape Strategy for Ireland 2015-2025* and the *All-Ireland Pollinator Plan*. It is embedded in the MASP and at local level in the *Galway Heritage Plan 2016-2021*, the *Galway City Biodiversity Action Plan 2014-2024* and the *Climate Adaptation Strategy (2019-2024)*.

2. Amend Policy 5.1 Green Network and Biodiversity no. 4 to include text in green as follows:

Support the implementation of the National Biodiversity Action Plan (NBAP) 2017- 2021 (and any subsequent NBAP) and the All-Ireland Pollinator Plan (2021-2025) and support the actions of the City Council's Heritage Plan 2016-2021 and Biodiversity Action Plan 2014-2024 relating to the promotion of ecological awareness, biodiversity and best practices.

3. Amend Policy 5.2 Protected Spaces: Sites of European, National and Local Ecological Importance and insert text in green as follows:

14. Support and implement measures to control and manage alien/invasive species, where appropriate in accordance with the EU (Birds and Natural Habitats) Regulations 2011.

4. Amend Table 5.6 Network of Local Biodiversity Areas and insert text in green as follows:

Description	Details
Merlin Park Woods	Mature broad-leaf trees, mixed broad-leaf / conifer woodlands, includes annex 1 habitat.

5. Amend Policy 5.2 Protected Spaces: Sites of European, National and Local Ecological Importance - include text in green as follows:

10. Protect and conserve rare and threatened habitats and their key habitats, (wherever they occur) listed on Annex I and Annex IV of the EU Habitats Directive (92/43EEC) and listed for protection under the Wildlife Acts 1976-2000 and plant species listed in the Flora Protection Order 2015.

15. Protect the ecological integrity of statutory Nature Reserves, Wildfowl Sanctuaries, refuges for fauna and Annex 1 Habitats.

6. Amend Section 5.10 Specific Objectives No. 38 - include text in green as follows:

38. Progress the acquisition of lands for recreation and amenity and including land for nature conservation/biodiversity purposes, and other lands which will enhance the extent of the green network, in particular key linkages and lands for active and passive recreation.

7. Amend Policy 5.3. Blue Spaces: Coast, Canals and Waterways and insert no. 21 – text in green as follows:

21. Ensure the conservation of the special recreational value of the riverside walk from Wolfe Tone Bridge to Salmon Weir Bridge and require that developments abutting the walkway incorporate measures to minimise noise levels in their design and reduce the emission and

intrusion of any noise which might have potential to adversely impact on amenities and quiet space attributes.

8. Amend Section 5.7.1 Greenways, Boreens and Public Rights of Way- insert text in green after the 3rd paragraph as follows:

The plan acknowledges that in order to conserve and protect sensitive ecological areas, greenway routes may need to be restricted or redirected to less sensitive areas. In this regard, the routes of proposed greenways shown on accompanying Development Plan maps are indicative only. Proposed greenways will be subject to a route selection process, which will take cognisance of site-specific circumstances including consideration of ecological and environmental sensitivities. Such routes will only be developed within and adjacent to European Sites where it can be shown that there will be no adverse impacts upon the integrity of the sites as defined by their conservation objectives.

In particular, the section of the indicative coastal greenway route between Ballyloughane and the eastern city boundary will be further considered following the establishment of the National Galway to Dublin greenway preferred route option which is due to be finalised in Q4 2022. In the event that this preferred national route option differs in alignment to the Galway City Council mapped indicative greenway route, the objective will not continue to accommodate a cycle route but will be to provide solely for an informal walking greenway route.

In particular, the section of the indicative coastal greenway route between Ballyloughane and the eastern city boundary will be further considered following the establishment of the National Galway to Dublin greenway preferred route option which is due to be finalised in Q4 2022.

In the event that this preferred national route option differs in alignment to the Galway City Council mapped indicative greenway route, the objective will not continue to accommodate a cycle route but will be to provide solely for an informal walking greenway route.

9. Amend Policy 5.8 Community Spaces: Allotments, Community Gardens and Cemeteries- include text in green as follows:

3. Protect historic graveyards within the city and ensure appropriate management and maintenance of those in the ownership or care of Galway City Council.

10. Amend Section 5.5.2 Rivers, Canals and Waterways and insert additional text after the 3rd paragraph – set out in green text as follows:

Proposed blueways will be subject to a route selection process, which will take cognisance of site-specific circumstances including consideration of ecological and environmental sensitivities. Such routes will only be developed within and adjacent to European Sites where it can be shown that there will be no adverse impacts upon the integrity of the sites as defined by their conservation objectives.

11. Amend Section 5.10 Specific Objectives and insert additional text in green and omit text using ~~strike-through~~ as follows:

32. Investigate the potential of providing services, for example kiosks, ~~public toilets~~ and food trucks, in or in close proximity to public parks and open spaces and along the coast and waterways

33. Seek to provide public toilets, in or in close proximity to public parks and open spaces and along the coast and waterways.

12. Amend Policy 5.2 Protected Spaces: Sites of European, National and Local Ecological Importance, No. 9 by the inclusion of text in green as follows:

Co-operate with the NPWS, landowners and stakeholders in the preparation and implementation of management plans for designated sites **and support conservation objectives of lands within Designated Sites for nature conservation Natura 2000 (SAC/SPA) and NHA sites.**

Other Chapter 5: CE Recommendations

In response to OPR

13. Amend Section 5.13 Specific Objectives Community Spaces – Short Term by inserting the following specific objective as follows:

Continue the phased recording of Public Rights of Way in accordance with OPR good practice guidance and make publically available by inclusion in the website inventory and by use of the plan variation process.

14. Amend Section 5.9 Agricultural Lands and insert text in green as follows:

....A limited type of residential development may be considered in areas zoned A. However, unless a convincing case of need is established, consent for dwellings will not be considered except to the immediate members of families (i.e. sons and daughters, grandchildren, nieces and nephews) of persons who are householders and residing in the immediate area and to farmers and the immediate members of their families. **A demonstrable economic and/or social need to locate on these lands, supported by documentary evidence of an acceptable nature, will be required.** In all cases conditions on a grant of permission may be applied regarding initial occupancy. Such residential developments will not be open for consideration where suitable alternative sites are in the control of applicants or their immediate family and available on lands zoned for development within the City Council area....

Chapter 6: Economy, Enterprise and Retail

6.1 - Part 1: Economy and Enterprise Context		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-118 Ibec	<p>Economy general</p> <p>Submission referenced the need for Galway City Council to support the development and enhancement of the city's experience economy. The Experience Economy encompasses hospitality, retail, travel, food, drink, tourism, entertainment, technology, events and organisations in the arts, cultural, sporting and heritage sectors. It reaches deep into the supply chain supporting business and employment encompassing many hard to reach but critical elements of the economy and society: young people, small medium enterprises, regional and rural development, with real, tangible benefits for the entire country. This can be achieved through the Development Plan 2023-29 and other local initiatives. It is interconnected with other measures such as tourism, the night-time economy and addressing the commercial mix within the city core.</p> <p>The pragmatic response of local authorities to Covid in terms of actively supporting outdoor seating and the use of the public realm should become a positive legacy of the crisis. Efforts such as this, pedestrianisation initiatives, and the creation of new public spaces will improve local destinations. It is important that positive and constructive engagement between the local authority, other public stakeholders and local businesses continues over the lifetime of the Development Plan 2023-29.</p>	<p>CE Response</p> <p>Comments are noted. Chapter 6 of the draft plan recognizes the need to adapt to meet the needs of the Experience Economy. Specifically, Section 6.4 of the draft plan includes for the need for creative destinations and attractive public spaces as part of the Experience Economy. Section 6.3 of the draft plan makes provision for the different employment sectors and clusters, while Section 6.10 the Night-Time Economy will contribute to the Experience Economy. This in addition to the forthcoming LECP and Joint Tourism Destination Brand for Galway, being prepared with Galway City Council and County Council in partnership with Fáilte Ireland will further develop the Experience Economy.</p> <p>Chapter 7 of the draft plan also include for policies and relating to a creative city and an inclusive city, also relevant to the Experience Economy.</p> <p>Chapter 8 of the draft plan supports the implementation of the Public Realm Strategy and associated scheduled projects included in it which support outdoor dining and improvements to outdoor spaces. In tandem with the promotion of increased outdoor spaces through implementation of the Public Realm Strategy, measures for increased pedestrianisation are also a priority of the GTS.</p> <p>The Retail Strategy as supported in Policy 6.11(5) also aims to "Improve access and permeability in the city centre and other designated centres with particular emphasis on improving the public realm with a focus on an increase in pedestrianisation and enhanced access by public transportation, cycling and walking".</p>

	<p>Atlantic Economic Corridor (AEC)</p> <p>The development of, and building out of the Atlantic Economic Corridor (AEC) must be supported in the Development Plan 2023-29 to ensure that the associated economic and growth opportunity is realised for Galway, the wider region and corridor. Project Ireland 2040 supports the development of the AEC and specifically highlights the contribution that the AEC can make to achieve the regional growth objectives of the NPF.</p> <p>The Development Plan must enable the region to make a significant contribution to the growth of the AEC. It has a crucial role to play in maximising the growth potential of the regional urban centres and the economy as a whole. Local regeneration will stem from the AEC. Projects within the AEC are key in delivering the objective of enhanced regional accessibility and allowing regions to act as a counterbalance to Dublin and the East coast, thereby attracting talent and promoting investment. Improved inter-urban connectivity would enhance the prospects for enterprise development and job creation, especially at strategic locations along the AEC.</p> <p>A key objective of the Development Plan must be to maximise the assets along the western seaboard and connect the economic hubs, clusters, and catchments of the region to attract investment, support job creation and contribute to an improved quality of life. This will be a major enabler of regional development.</p>	<p>CE Response</p> <p>Chapter 6 acknowledges that key enablers to deliver a successful city and region will be investment in improved national connectivity to and within the region and within the city, so that the Galway MASP will have capacity to collectively, with other regional cities deliver greater alternatives to the growth of Dublin.</p> <p>Section 1.6 of the plan acknowledges Galway as a key regional employment base, located centrally along the Atlantic Economic Corridor will support many of these future jobs, providing employment for the targeted population for the Galway MASP and the significant employment catchment of the city. Chapter 4 highlights the strategic importance of The Western Rail Corridor project and the contribution it would make in the realisation of the Atlantic Economic Corridor and the potential to link the economies of three major centres, Limerick, Galway and Sligo.</p> <p>Chapter 6.1 Context Section provides that this investment in low carbon public transport, active travel modes and the connecting of road networks will support the advancement of the regional cities, their respective regions and progress and strengthen the Atlantic Economic Corridor (AEC). Galway City is located midway along this corridor can both benefit and contribute to the aim of establishing a connected spine of business and organisations that collaboratively can maximise its assets, attract investment and create jobs that will drive the NPF agenda for regional development that complements and balances with Ireland's thriving east coast.</p>
GLWC-C2-147 Galway City Community Network	<p>Monitoring UN SDGs</p> <p>Indicator:</p> <ul style="list-style-type: none"> • SDG GFI 8.2.1: annual growth rate of real GDP per employed person • SDG GFI 8.4.1: material footprint per capita and per GDP, 	<p>CE Response</p> <p>The SDG's are addressed under section 1.3.1 of the draft plan with SDGs also aligned with each chapter. The two year review of the plan as set out in Appendix 1 Monitoring and Implementation will include for the progress review of policies and objectives and will also provide an opportunity to review the SDGs that are</p>

	<ul style="list-style-type: none"> • SDG GFI 8.4.2: domestic material consumption, domestic material consumption per capita, and domestic material consumption per GDP • SDG GFI 8.9.1: Tourism direct GDP as a proportion of total GDP and in growth rate. • SDG GFI 9.1.2: Passenger and freight volumes, by mode of transport. • SDG GFI 9.4 the upgrade of infrastructure and retrofit of industries to make them sustainable, with increased resource-use efficiency, along with the adoption of clean and environmentally sound technologies and industrial processes. This can be assessed by SDG GF1 9.4.1: CO2 emission per unit of value added. 	aligned to each chapter to form part of this review. Reference has been made in the response to an OPR Observation in submission 165 highlighting that a methodology approach for Appendix 1: Implementation and Monitoring will be part of the final plan.
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6.2 - Economic Activity

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-118 Ibuc	<p>Regional Productivity</p> <p>Skills, talent, connectivity and quality of life are critical to the Region's productivity and a key part of a value proposition to attract and retain businesses and workers. The Galway City Development Plan 2023-2029 comes at a critical time for the economy and society. Several factors, including the impacts of Brexit and Covid as well as energy costs and the Environmental, Social and Governance (ESG) agenda, have significantly changed the policy landscape.</p> <p>The priorities for the new Galway City Development Plan therefore need to reflect these developments in the external environment and identify, resource and deliver solutions to address these new and emerging challenges. With the right focus, investment and planning, Galway city can continue to grow and be successful and provide a vibrant and</p>	<p>CE Response</p> <p>Comments are noted. The plan has been prepared having regard to the development in these external factors and emerging challenges as acknowledged in the Section 6.1 and has informed the context of policies throughout the Economy, Enterprise and Retail Chapter.</p>

	sustainable environment where future generations can live and work.	
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6.3 - Employment Sectors & Clusters		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-6 Galway Market Committee	<p>Saint Nicholas Market</p> <p>Signage at the entrance of Church Lane via Shop Street would recognise the historic and cultural significance of the market. The pandemic has highlighted the importance of the market to the cultural fabric of the city, dating back to 1484 and requires urgent investment in order to flourish into the future.</p> <p>Requirement for electricity and adequate signage for Saint Nicholas Market. The electrification would add to visitor experience and requirement for generators.</p> <p>Deterioration in the paving around St. Nicholas Church and adjacent area which is a hazard and prone to constant flooding.</p> <p>Also relevant to 8.9 Public Realm</p>	<p>CE Response</p> <p>Comments are noted. Support for public realm improvements throughout the city centre area are included for in Section 8.9 of the draft plan and are supported in a range of policies in Policy 8.8 (1 thru 10).</p> <p>Some issues raised are operational in nature and need to be addressed by the Environment and Transport Sections. Additional support however can be included in Section 6.3(10) of the draft plan as proposed.</p> <p>CE Recommendation</p> <p>Amend Section 6.3(10) Creative Economy and Gastronomy Sectors to include text in green:</p> <p>The Plan through policies and objectives support the development of this sector and encourage further development of the expanding food and beverage sector onto regeneration sites and accommodation of proposed outdoor markets and dining and enhancement of existing markets through improvements and facilitating investment in the public realm.</p>
GLWC-C2-148 Galway City Community Network	<p>Policy 6.5 Enterprise and Innovation.</p> <p>CCN requests that the following are included in Policy 6.5 Enterprise and Innovation.</p>	<p>CE Response</p> <p>Policy 6.5 Enterprise and Innovation “recognises the value of social enterprise in the city and support the objectives of the National</p>

<p>The Council will provide social enterprise incubation infrastructure required for growing and strengthening social enterprise based on the needs identified through engagement with social enterprises and communities.</p>	<p>Social Enterprise Policy for Ireland 2019-2022 as further affirmed under the national commitment to support the Toledo Declaration.</p>
	<p>Section 6.3.5 of the plan also recognises “the value of social enterprise in the city and will facilitate and support the main objectives of the first National Social Enterprise Policy for Ireland 2019-2022 through building awareness of social enterprise, and through supporting the provision of social enterprise incubation infrastructure required for growing and strengthening social enterprise and achieving improved alignment with relevant government policy areas”.</p>
	<p>A new policy is recommended to reflect the text under Section 6.3.5 of the draft plan in Policy 6.5 Enterprise & Innovation to reflect support for the provision of social enterprise incubation infrastructure required for growing and strengthening social enterprise.</p>
<p>The Council will provide spaces at affordable rents and rates levels for a range and variety of social enterprises.</p> <p>The Council will audit vacant and derelict sites for the potential to be used as sites for social enterprise</p>	<p>The issue of providing affordable rents for social enterprises is outside the scope of this plan and may be more appropriately addressed in the forthcoming LECP.</p> <p>An audit of vacant and derelict sites for potential use for social enterprise and other is outside the remit of the plan and may be better suited to be addressed in the forthcoming LECP.</p> <p>CE Recommendation</p> <p>Amend Policy 6.5 Enterprise and Innovation 3 (b) to include text in green:</p> <p style="color: green;">Support for the provision of social enterprise incubation infrastructure required for growing and strengthening social enterprise.</p>

GLWC-C2-148 Galway City Community Network	<p>Policy 6.8 Tourism Sector</p> <p>The Council will provide for the sustainable development of areas such as the Merlin Woods Castle and Terryland Forest Park and build land/green bridges to connect them to communities. The Council will develop eco-tourism opportunities by developing the woodland areas around the city.</p>	<p>CE Response</p> <p>Comments are noted. Chapter 5: Natural Heritage, Recreation and Amenity provides commitment for the preparation of masterplans under Specific Objective 5.10(6) "Continue the preparation of masterplans for parks, in accordance with the Recreation and Amenity Needs Study and where superseded by Green Space Strategy in consultation with all stakeholders including Barna/Lough Rusheen Park, Merlin Woods City Park (Doughiska RA zoned land), Terryland Forest Park and Castlepark, Ballybane (RA zoned lands) and a key management objective will be to maintain and enhance their biological diversity". This objective has capacity through its implementation to facilitate opportunities for eco-tourism.</p> <p>Specific Objective 10.27 (3) to prepare a Local Area Plan for the Headford Road area will review the lack of cohesion in this area with a view to creating a sense of place, good linkages and take advantage of the adjacent natural heritage assets, which include the River Corrib and Terryland Forest Park.</p>
GLWC-C2-132 NUI Galway	<p>Nuns Island Masterplan</p> <p>Funding received under the URDF funding stream 2020 will advance plans for an additional hub, the Galway Innovation and Creativity District, a joint venture between Galway City Council and NUI, Galway. This will include for a riverside regeneration project at the campus and on NUI Galway properties at Nun's Island and will strengthen the linkages between business, research and city living. NUI Galway welcomes inclusion of policy 6.2.4.</p>	<p>CE Response</p> <p>Comments noted and welcomed.</p>
GLWC-C2-144 Innovation Technology AtlanTec Gateway (itag)	<p>Development of technology innovation along the AtlanTec Gateway</p> <p>There is an opportunity for Galway city to significantly improve on the current level of 'ICT and Professional</p>	<p>CE Response</p> <p>These comments are noted. The draft plan acknowledges the importance of ICT and Professional Services to the economy in</p>

<p>Services' in the city, which according to the report (page 154) are below the state average at 15.9% or 11,125. Key enablers are seen as:</p> <ul style="list-style-type: none"> • Access to talent, enabled by affordable housing and accommodation (since the city is already a very attractive location for Irish workers nationwide, as well as highly educated foreign workers) • Reduced traffic congestion and more effective public transport to shorten and ease commutes • Attractive city centre work locations and offices for high tech industry • More affordable childcare in close proximity to work locations <p>Submission strongly supports:</p> <p>The availability of a high quality, efficient telecommunications network as being an essential enabler of social and economic activity in the city (page 236) and would like to emphasize the criticality of such services, not just to the high tech and digital media sectors but to all businesses going forward.</p> <p>The wide availability of excellent, high-speed broadband services is seen as critical to supporting the high tech and digital media industries in Galway and the surrounding areas. With emerging hybrid working practices it is critical that these services also extend to the more rural, and affordable, housing areas surrounding Galway city. It is recommended that, as a critical infrastructure supporting the ongoing and future development of the city, the Galway City Development Plan adopts more active measures to ensure the development and availability of these services.</p>	<p>Chapter 6 and support throughout associated policies, and the importance in attracting and retaining talent to Galway. Specifically Policy 6.1(6) aims to "maintain and enhance the attractiveness of the city and the quality of life it supports in order to sustain investment, quality employment opportunities and to attract and retain an appropriately skilled workforce".</p> <p>In addition to Chapter 6, policies across the draft plan aim to make the city more attractive and livable, supporting affordable housing (Chapter 3) and reduced traffic congestion and modal shift to more active travel measures and increased public transport to achieve this (Chapter 4). Specifically Chapter 10 provides for large scale regeneration and opportunity sites.</p> <p>Policy 6.1(5) provides for opportunities for growth, innovation and investment across all sectors in order to create a resilient and diverse city economy that will maximise high value employment opportunities for the entire workforce and facilitate measures for a just transition in society. The issue of more affordable childcare is outside the scope of this plan.</p> <p>The importance of high speed internet is supported in the plan in Chapters 6 and 9, specifically in Sections 9.11 Telecommunications and 9.12 A Smart City. The need for an efficient telecommunications network is acknowledged as an essential enabler of social and economic activity in the city for all businesses, including those working remotely or from home.</p> <p>This is covered in Policy 6.4 which "promotes a Smart City approach through the application of new innovations and digital technologies to support economic growth, citizen engagement, enhance the quality and performance of urban services and to reduce costs and consumptions of resources".</p> <p>It is acknowledged that with more people working from home, the role of the office is shifting as noted in Chapter 6. Section 6.1,</p>
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	<p>In contrast to the plan text we view the general trend for hybrid working to be very predictable, at least for technology and non-manual workers. These workers are predicted to spend more time working from home, requiring suitable home working spaces and excellent broadband, and their companies are expected to require more flexible and attractive office spaces for hybrid workers, supporting a greater workforce for a given office area. Submission strongly encourages Galway City Council to explicitly consider these important trends in terms of both residential and commercial building planning and development.</p> <p>Submission encourages Galway City Council to consider the following additional elements as part of the further development of the Galway City Development Plan:</p> <p>There is an opportunity to do more in the Galway City Plan to develop and support city centre offices suitable for multinational and Irish technology companies, with specific support for hybrid workers to support hybrid working practices and hybrid work spaces, with many tech companies and workers favouring lively city centre locations, such as Galway city centre, for their offices. In combination with the business incubation and innovation centres there is the opportunity to develop a high tech hub and community within the city centre environs to further promote and grow the high tech industry in Galway city.</p>	<p>second paragraph will be amended to include the National Remote Work Strategy.</p> <p>Chapter 10 supports a range of regeneration sites that can support mixed use in the city centre locations for the development of high tech office workspace. There is demand for large scale floorplate office space in FDI developments. Emerging campuses at Bonham Quay, Metlife Global Technology Campus at Augustine St. and Crown Square are testament to this.</p> <p>CE Recommendation</p> <p>Proposed amendment in Section 6.1 Context seventh paragraph:</p> <p>Overall it is not possible to predict how the new and evolving hybrid work models and increased digitisation will impact on commuting patterns or demand for workspaces. This reflects the complexity of such changes which range from complete or partial remote working, off site digital hub arrangements, digital nomad work and other flexible preferences. The National Remote Working Strategy acknowledges that remote working is expected to continue with a majority of employees wishing to adopt a hybrid model. This will provide for increased flexibility for work arrangements and facilitates for a reduction in commuting distances and times. The Strategy supports the development of remote working hub infrastructure. Remote working hubs will offer the potential to access quality office facilities and technology, meeting spaces. As the landscape of work changes so will the implications on spatial planning. This plan needs to support the evolving arrangements and use the monitoring structure over the period of the plan to gauge the need for flexibility to respond to these shifting trends and capitalise on potential opportunities for delivering both economic and sustainable benefits.</p>
GLWC-C2-211 SSE plc	<p>Marine Sector and Renewable Energy- Wind Energy</p> <p>Submission notes that Ireland currently boasts nearly 4309 MW of installed onshore wind generation capacity (Wind</p>	<p>CE Response</p> <p>Comments are noted. The plan will provide support to maximise the potential of the Port of Galway as a support hub for the further</p>

	<p>Energy Ireland, 2022), making Ireland a world leader in this field. Galway County currently has 446 MW of operational onshore wind farms, equivalent to approximately 11% of the national capacity, with significant potential for further development. Offshore wind presents significant opportunities for Galway post-2030. Submission welcomes the acknowledgement in 4.7, 6.9, and 9.10 of the draft CDP of the key role that the Port of Galway can and should play in developing the offshore potential of Ireland's western seaboard. Submission welcomes the supportive statements in page 163 of the draft CDP on proposals to develop the Port of Galway.</p> <p>Submission Recommendation:</p> <p>Provide all available support to maximise the potential of the Port of Galway as a support hub for the further development of the wind energy industry, particularly on the western seaboard.</p>	<p>development of the wind energy industry, particularly on the western seaboard. Reference has been made to this through the inclusion of additional text and policy in Chapters 4, Chapter 6 and Chapter 9.</p> <p>CE Recommendation</p> <p>Amendments to text and policy have been made in Chapters 4, 6 and 9 to provide support to maximize the potential of the Port of Galway as a support hub for the further development of the wind energy industry on the western seaboard. Refer to Chapter 4 CE Recommendations.</p>
GLWC-C2-118 Ibuc	<p>Higher Education Institutions</p> <p>Higher education institutions are critical to the future economic performance of the city. The student population make a significant contribution to the city's vibrancy and diversity and is an important aspect of the economic and social life of the city centre. Galway must be recognised as a student friendly city. Focused investment across the Metropolitan Area, will deliver a vibrant and diverse University and Learning City with a high quality of life for all through a high standard of physical and community infrastructure and opportunities for employment. By supporting education and training providers, Galway City can ensure that knowledge and skills transfer benefit all citizens to help address skills shortages and support lifelong learning.</p>	<p>CE Response</p> <p>Comments are noted and addressed in the draft plan. Chapter 6 recognises Galway as a student friendly city and notes the positive contribution that the significant third level population makes to the city's local economy, vibrancy and diversity in the city. Continued support is included in Policy 6.7 "Supports and facilitates the sustainable development of the strategic health and knowledge institutions in their primary functional roles and also where they contribute to innovation, research, training and skills development".</p> <p>Chapter 7 also includes for support for Higher Education Institutions as set out in Policy 7.6 Education.</p>

GLWC-C2-230 Dept. Housing, Local Government and Heritage	<p>Policy 6.9 Marine Sector & Renewable Energy</p> <p>The department recommend inclusion in Policy 6.9 Marine Sector & Renewable Energy no. 3 to ensure compatibility with nature conservation and biodiversity protection and where potential issues have been addressed in Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Ecological Impact Assessment (ECiA) as appropriate</p> <p>Marine Sector and renewable energy Policy 6.9 No. 3 should include a requirement for biodiversity protection.</p>	<p>CE Response</p> <p>Comments are noted. It is considered that Policy 1.4(14) Core Strategy adequately supports the implementation of the SEA Directive, the Habitats Directive, Birds Directive, EIA Directive and Water Framework Directive and appropriate supporting legislation and guidelines and refers to all policy and objectives in the plan, where relevant.</p> <p>Policy 5.2 Protected Species: Sites of European, National and Local Ecological Importance (1-15) includes for a comprehensive approach to ensure all plans and projects are assessed appropriately.</p>
GLWC-C2-76 Fáilte Ireland	<p>6.3.8 Tourism</p> <p>Tourism could be more strongly referenced throughout the Draft Development Plan and in particular the inclusion of a dedicated Tourism Chapter, or a more detailed and robust Tourism Section. This would ensure that all aspects of tourism policy are captured in a clear and robust manner within the Plan.</p> <p>Tourism is a key economic driver and not only has significant economic value, it also has huge amenity, cultural and community value. It is requested the inclusion of an objective supporting the preparation and implementation of a Regional Tourism Plan which is currently being prepared. This plan will identify sustainable tourism development priorities that will help to unlock the commercial potential of the region.</p>	<p>CE Response</p> <p>A dedicated section on the tourism sector is included for in the draft plan under section 6.3.8 for policies and objectives relative to the tourism industry and the wider economy. A separate chapter is not required, however there is scope for additional text and policy to be included in the draft plan to strengthen Section 6.38 Tourism Sector. The draft plan acknowledges that a well-managed tourism sector is critical to the economy of the city and region. To elaborate on this additional policy support will be added to section 6.8 Tourism Sector as per the recommendation.</p> <p>It is not considered necessary to specifically mention all tourism related projects in the plan. The Council welcome the funding opportunities provided through the Destination Town Scheme. It is considered that it would be more appropriate to reference this the forthcoming Joint Tourism Destination Brand for Galway, a joint venture between Galway City Council, Galway County Council and Fáilte Ireland</p> <p>Accessibility polices are an integral part of the development plan approach and are included for across all sectors of the plan: public</p>

	<p>Include a policy/objective to support the Destination TownScheme projects in the city and greater integration of Wild Atlantic Way branding into the plan.</p> <p>Request for an accessible tourism policy to be inserted into the plan</p> <p>Include an objective to support management and maintenance of the Wild Atlantic Way signage and wayfinding in the city and maintenance of discovery points and access routes in the city.</p> <p>The plan include specific objectives to support investment in digital technology in the tourism sector; promotion of business tourism, and the Fáilte Ireland Outdoor Dining Scheme</p> <p>Request inclusion of a strategic goal to acknowledge the importance of the tourism sector in the city and requests updates to text in Chapter 6 and Chapter 8 in relation to visitor numbers, funding streams, outdoor dining and events.</p> <p>Edits to policy 6.12.4 relating to the evening and night-time economy to be elaborated on.</p>	<p>transport, active travel, buildings, the public realm and community and culture. It is considered that a separate policy in not necessary in Chapter 6.</p> <p>Policy 6.8 (1) " Recognises the significant contribution that national and international tourism makes to the local economy and the vitality of the city and facilitate, in partnership with Fáilte Ireland and key stakeholders, the sustainable development of associated infrastructure, attractions, including a destination attraction of scale and events particularly where they reflect the distinctive history, culture and environment of Galway and highlight the significance of Galway as the only city on the "Wild Atlantic Way "and as a gateway to the Northern and Western Region".</p> <p>Policy 4.4(10) promotes the implementation of a Wayfinding Scheme with provision of directional information which can be adopted to also support wayfinding signage for the Wild Atlantic Way.</p> <p>It is considered reasonable to include an additional objective in support of investment in Digital Technology and for the promotion of business tourism as requested.</p> <p>It is considered that the inclusion of a strategic goal is not needed to acknowledge the importance of the tourism sector in the city as this is acknowledged throughout Chapters 6 and 8. Proposed amendments in Section 6.3.8 and Policy objective 8.8(6) are have been made to reflect updated figures.</p> <p>Comments are noted and accepted. Policy 6.12(4) is proposed to be amended.</p> <p>CE Recommendation</p>
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	<p><i>Amend the first paragraph of Section 6.3.8 Tourism Sector to delete strikethrough and add text in green</i></p> <p>Galway City and County accounted for 59% of the tourist visits in 2019 for the North-West region and benefits greatly both economically and from the added vitality it brings. Prior to the year impacted by the Covid-19 pandemic Galway City and County welcomed 2.7m tourist trips in 2019 (1.7m overseas and 1 million domestic trips) t according to Fáilte Irelands Survey of Overseas Travellers and the CSO's published figures on domestic travel hosted up to 1.7m international tourists and 1 million domestic tourists per year as recorded by Tourism Ireland.</p> <p><i>Amend fifth paragraph of Section 6.3.8 Tourism Sector to include text in green:</i></p> <p><i>Funding under the Destination Town Scheme, Platforms for Growth and Shared Water Facilities Scheme funding streams will further explore the potential of these areas as blueways that can support facilities for tourist activities'</i></p> <p>Amend Policy 6.8(7) Tourism Sector to add text in green <i>Support the preparation and implementation of the forthcoming Regional Tourism Strategies and the continued collaboration with Fáilte Ireland and tourism stakeholders to ensure successful implementation and delivery of these tourism plans.</i></p> <p>Amend Policy 6.8(8) Tourism Sector to add text in green <i>Support the promotion of Business Tourism to actively develop Galway as a an events location with the appropriate infrastructure to attract international conferences, sporting, cultural and commercial events</i></p> <p>Amend Policy 6.8 (9) Tourism Sector to add text in green <i>Encourage and support investment in digital technology in the tourism sector, with a particular focus on sectors such as visitor</i></p>
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	<p>attractions and activities with low digital presence and/or integration.</p> <p>Amend Policy 6.12 (4) Retail Hierarchy to add text in green</p> <p><i>Support the development of a vibrant, inclusive, evening and night-time culture and economy through sustainable measures and promote the need for associated transport supports, measures to secure a safe environment, and for diversity in entertainment and creative offerings, which may include extended opening hours, outdoor dining and outdoor events and for the greater utilisation of existing heritage assets.</i></p> <p>Amend Policy 8.8(6) Public Realm to add text in green:</p> <p><i>Promote the important role that public space plays in providing for informal social interaction and maximise opportunities for outdoor gathering places, play areas, outdoor dining and outdoor public seating, where appropriate and in accordance with the Public Realm Strategy and accompanying manuals.</i></p>	
GLWC-C2-118 Ibuc	<p>Tourism</p> <p>Tourism will be essential to the sustainable recovery and growth of the city. As tourism is an important indigenous sector in Galway, attractions and infrastructure will need to be upgraded over the coming years, in addition to developing new experiences that could be enjoyed by locals and visitors alike. Focus should be on the development and enhancement of cultural and heritage experiences to attract a wide range of visitors. It should also continue to advance projects that leverage placed-based assets and catchments sustainably across the city. This includes increased active travel infrastructure and public realm improvements.</p> <p>The Development Plan 2023-29 must support investment in the sector across accommodation provision, visitor</p>	<p>CE Response</p> <p>Comments are noted. The concept of sustainable development is central to the draft plan strategy. Policy in the Tourism Section reflects this.</p> <p>The draft plan acknowledges the contribution that blueways, greenways, cultural and heritage experiences and other place-based assets make to the overall attractiveness and enhancement of the Tourism Sector. Policy 6.8(2) and 6.8(3) specifically references support for these tourism offerings.</p> <p>The draft plan supports investment in tourism accommodation provisions in policy 6.8(4) which supports a range of tourist accommodation and policy 6.8(6) includes for the adoption of a VICE model for destination model, which includes form Visitors, the</p>

	<p>experience development, visitor awareness and accessibility, and other critical enablers.</p>	<p>Industry, the Community that hosts them and the response to the Environment.</p>
GLWC-C2-96 Department of Agriculture, Food and the Marine - Environmental Co-ordination Unit Climate Change & Bioenergy Policy Division	<p>6.3.9 Marine Sector and Renewable Energy</p> <p>Submission welcomes the support in the plan for the fishing industry and notes that the plan supports the construction of offshore windfarms. It states that any proposed offshore renewable energy installations (including offshore windfarms, tidal, and wave generators) needs to consider and evaluate potential impacts on any commercial sea fishing activities and it is essential that any negative impacts on fisheries are avoided. Engagement should be sought with the fishing industry and other relevant stakeholders at as early a stage as possible to discuss any changes that may affect them to afford a chance for their input. Fishers' interests and livelihoods must be fully recognised, supported, and taken into account.</p> <p>The National Marine Planning Framework (NMPF) falls under the remit of the Department of Housing, Local Government and Heritage and not the DAFM.</p>	<p>CE Response</p> <p>Comments are noted and provided for in Policy 6.9(1) Marine Sector and Renewable Energy "promotes, encourages and facilitates the sustainable growth and competitiveness of enterprise activities associated with the ocean and coastal economy including transport, trade, fishing, aquaculture, research, marine industries, renewable energy, tourism and leisure".</p> <p>Any proposed offshore renewable energy installations will need to consider and evaluate potential impacts on any commercial sea fishing activities and to avoid any negative impacts on fisheries as part of the relevant planning consent process.</p> <p>Noted. Edit have been made in the SEA to correct this. See SEA Chapter Recommendations.</p>
GLWC-C2-179 Department of the Environment, Climate and Communications	<p>Policy 6.9.4 - DECC</p> <p>Policy 6.9, item 4 (page 164) - Support the sustainable re-development and extension of the Port of Galway and the diversification and expansion of activities subject to environmental, visual, economic viability and transportation considerations <u>in line with the National Marine Planning Framework (NMPF) 2021 and the 'Offshore Renewable Energy Development Plan' (OREDP) published in 2014 by the Department of Communications Energy and Natural Resources (and subsequently reviewed in 2018), and any</u></p>	<p>CE Response</p> <p>The comments on Policy 6.9 are noted. Support for the development of off-shore renewable energy production is implicit in the policy and is further expanded on in section 4.7 and 6.3.9. The addition of text to reference the National Marine Planning Framework (NMPF) 2021 is considered acceptable.</p> <p>CE Recommendation</p> <p>Amend Policy 6.9(4) to add text in green</p> <p>Support the sustainable re-development and extension of the Port of Galway and the diversification and expansion of activities subject</p>

	<p>successor thereof, or any emerging national ports strategies.</p>	<p>to environmental, visual, economic viability and transportation considerations in line with the National Marine Planning Framework (NMPF) 2021, and any successor thereof, or any emerging national ports strategies.</p>
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6.4 - Part 2: Retail Strategy Context

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-69 Galway County Council	Galway County Council looks forward to further collaboration with the City Council on the preparation of a Joint Retail Strategy.	<p>CE Response</p> <p>Comments are noted. The City looks forward to further collaboration with the County Council on the preparation of a Joint Retail Strategy. This plan has included a policy for a Work Implementation Group for the Joint Review under new policy 6.11(3) and as per the recommendations from the OPR response.</p>
GLWC-C2-201 Galway City Alcohol Forum GLWC-C2-148 Galway City Community Network	<p>Alcohol Outlets</p> <p>The plan should restrict the total number of alcohol outlets and limit alcohol outlet density as part of an overall plan to prevent and reduce alcohol related harm in Galway City. The Council will develop and diversify the Night-Time Economy, ensuring that there is no increase in the number of outlets selling alcohol.</p>	<p>CE Response</p> <p>Comments are noted. The plan supports the diversification of the night-time economy for activities to extend beyond alcohol establishments as set out in Section 6.10 of the draft plan. Policy objective 6.12(4) supports the development of a vibrant, inclusive, night-time culture and economy through sustainable measures and promotes the need for associated transport supports, measures to secure a safe environment, and for diversity in entertainment and creative offerings. The plan also identifies the Creative Economy and Gastronomy Sectors under Section 6.3 (10) as areas that can also strengthen and diversify the development of a night-time economy. While this policy seeks to diversify the variety and types of night time economy the issue of restricting outlets selling alcohol is generally a licencing issue and outside the scope of the plan. It should be noted that Chapter 11 under section 11.4.5 Uses and 11.4.6 City Centre/Other Areas includes for development management standards for off-licenses and licensed premises.</p>

<p>GLWC-C2-156 Lidl Ireland GMBH</p>	<p>Retail Policy</p> <p>Submission outlines that there is a ‘disconnected’ and contradictory policy and objective approaches, which cumulatively undermine the core goals and objectives of the Development Plan. Main points from the submission are summarised as follows:</p> <p>Need for a retail strategy- Absence of a Retail Strategy and timeline or any urgency for same;</p> <p>Absence of alignment with requirements of the Retail Planning Guidelines;</p> <p>Absence of a clearly defined and layered retail hierarchy, and resultant absence of any meaningful guidance on the location or scale of retail development below the level of District Centre;</p> <p>Absence of clearly defined District Centres;</p> <p>There is a need for recognition (e.g. as District Centre) of the retail role of Salthill in the City;</p> <p>The submission also notes the need for the review of a number of retail categories and types to include:</p> <ul style="list-style-type: none"> • Convenience Retailing-The Role and Importance of Food Shopping. In this regard the specific omission of convenience retailing in a City Centre context is noted. The Retail Planning Guidelines refer to the Sequential Approach being applied specifically to District Centres as opposed to treating the District Centre as an ‘out of city centre’ location for example. • A Hierarchy of Centres- Greater clarity is required in our opinion, in order to provide clear guidance to direct the future pattern of retail development across 	<p>CE Response</p> <p>The RSES and the Galway MASP include support for the continued expansion and enhancement of retail development within the city, acknowledging in particular the significant retail function of the city centre and the catchment it has within the county and region. The MASP supports a retail hierarchy of centres within the city, which is a key requirement of the Retail Planning Guidelines (2012) to give direction on retail policy. In particular the hierarchy as provided for in the draft plan will inform the role and importance of the retail centres and it is the basis for determining the appropriate scale and type of retail activity at specific locations. The classification on the retail hierarchy reflects the retail functions of each centre and integrates with and supports the settlement strategy in the Plan.</p> <p>Comments relating to the absence of the Retail Strategy timeline and the alignment with the requirements of the Retail Planning Guidelines are noted. In view of the requirement of the Retail Planning Guidelines (2012) to have a joint strategy for the city and county, the retail hierarchy in Table 6.1 of the draft plan reflects the allocated level on the hierarchy for the settlements within the County as provided for in the settlement strategy and retail hierarchy of the Galway County Council Development Plan 2022-28. An amendment is proposed in Policy 6.11(3) as per the recommendation below.</p> <p>District Centres are included for in Level 3 of the Retail Hierarchy and includes three existing (Doughiska, Knocknacarra and Westside) and one planned district centre (Ardaun LAP). The CI zoned lands define these district centres and accords with the boundaries for these district centres.</p> <p>Salthill is included in the Retail Hierarchy as Level 5, a Neighbourhood Centre. Chapter 10 addresses this response in greater detail and notes that it would be contradictory to the retail strategy. It is considered that the nature and existing pattern of commercial development in Salthill merits its designation as a</p>
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	<p>the city, in particular the food sector. Key to this in our opinion is: a) A simplified / consolidated (convenience) retail hierarchy of centres; and, b) A broadened / clarified retail hierarchy of outlet types.</p> <ul style="list-style-type: none"> • A Hierarchy of Outlet Types- In our opinion, three core 'levels' of scale could be considered appropriate in terms of a hierarchy of outlet types, being as follows: 1. Corner / Symbol Group1 Shop – e.g. up to c. 250 sqm net retail sales area – providing a limited level of service, along well established market formats; 2. Local / Neighbourhood Supermarket – e.g. up to 2,500 sqm net retail sales area – providing for essential household food shopping at an accessible level; and, 3. District Supermarket / Superstore – e.g. a number of outlets each up to 2,500 or 5,000 sqm net retail sales area – providing for multiple outlet household and specialist food shopping. • Simplified/Consolidated (Convenience) Retail Hierarchy of Centres in order to provide greater clarity on the operation of retail planning (and zoning) policies in the city. There should be two key levels: a) the City Centre; and, b) District Centres. It should also be explicitly clear that the latter are equal to the former with regard to convenience retailing. 	<p>neighbourhood centre. (See Submission156 response in Chapter 10)The joint retail strategy will allow for an opportunity to review the retail hierarchy and Salthill.</p> <p>A review of retail categories will form part of the upcoming joint retail strategy with the County Council as per the new policy 6.11(10).</p> <p>CE Recommendation</p> <p>Amend Policy 6.11(3) Retail Strategy to add text in green (as per the response to the OPR in Submission 165)</p> <p>Review the strategies and policies for retailing and vary the plan if necessary following the preparation of a Joint Retail Strategy for the Galway Metropolitan Area with Galway County Council, to ensure sufficient policy support to create a positive framework for continued vitality and investment in the main retail areas especially the Galway MASP and to ensure an informed and consistent approach to policies relating to shared retailing activities in line with national policy. The preparation of the Joint Retail Strategy for the Galway Metropolitan Area will be completed within one year of the adoption of the City Development Plan and will be initiated and managed by a joint local authority working group.</p>
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6.6 - Retail Warehousing/Bulky Goods		
Submission No.	Submission Summary	CE Response and Recommendation

GLWC-C2-38 Transport Infrastructure Ireland	TII- Retail Warehousing/Bulky Goods and National Roads	CE Response
	<p>Advises that in the interest of clarity, a new policy objective should be included in the plan to reference the explicit presumption against large out of town retail centres (including Retail Warehousing/Bulky Goods) located adjacent or close to existing, new or planned national roads/motorways to reflect policy outlined in the RPG, 2012.</p>	<p>In accordance with the retail strategy and Core Strategy, it is considered appropriate to retain the existing specific objective in Chapter 11 section 11.2 (6) that Bulky goods retailing and local retailing needs, will be the only retail types considered on CI zoned lands not provided for in the Retail Hierarchy at/adjoining Seamus Quirke Road.</p>

6.7 - Need and Location of Future Retail Floorspace		
Submission No.	Submission Summary	CE Response and Recommendation

GLWC-C2-156 Lidl Ireland GMBH	Local Retailing Needs	CE Response
GLWC-C2-148 Galway City Community Network	<p>The Draft Development Plan continues to include a specific caveat on a wide number of Commercial/Industrial zoned sites where retailing is limited to local retailing needs (other than as provided for in the Retail Hierarchy) at or adjoining: Briarhill, Doughiska Road (West of), Tuam Road, Dublin Road, Sean Mulvoy Road, Sandy Road, Headford Road / Bóthar na Treabh (north of the Bodkin junction), Seamus Quirke Road and former Corrib Great Southern Hotel site.</p> <p>No definition of local retailing needs is provided, nor is any clarity on what being provided for in the Retail Hierarchy would entail. A Business as Usual approach is not appropriate nor sustainable in light of national and regional planning policies, along with this approach being in direct contravention of the Retail Planning Guidelines as it applies to plan making.</p> <p>In relation to the lack of a definition or scale, there are a number of examples of Supermarkets (at a scale of up to 1,296 sqm net retail floorspace) being permitted under the local retailing needs restriction, e.g. Lidl Doughiska (Reg. Ref's: 08/719 & 11/190) and the former Crown Paints site (Reg. Ref's: 06/223 & 12/277). More recently however An Bord Pleanála have under Ref: ABP-307522-20 created a degree of uncertainty in terms of what scale of retailing is appropriate to the local retailing needs affected areas, in refusing permission for a scale of 1,193 sqm net retail sales floorspace. The City Council subsequently refused permission for a yet smaller store under Reg. Ref: 21/299 (currently under Appeal under ABP- 312059-21).</p> <p>Preservation of an unexplained, undefined and unclear restriction of retail in terms of 'local retailing needs', which contradicts and undermines the overall approach to land use and retail development;</p>	<p>Local retailing for the purpose of the plan is in accordance with the Section 4.11(6) of the Retail Planning Guidelines, 2012 which defines local retail units as the following: Local retail units such as corner shops or shops located in local or neighbourhood centres serving local residential districts perform an important function in urban areas. Where a planning authority can substantiate the local importance of such units in defined local centres, they should safeguard them in development plans, through appropriate land-use zoning. Development management decisions should support the provision of such units, particularly where they encompass both food-stores and important non-food outlets such as retail pharmacies, and have significant social and economic functions in improving access to local facilities especially for the elderly and persons with mobility impairments, families with small children, and those without access to private transport.</p> <p>Comments are noted. The forthcoming Joint Retail Strategy will allow for local retailing needs to be reviewed and for consultation in any variation that is required for amendments.</p>

	The Council will focus on 'local' in retail strategy and should facilitate spaces that highlight local crafts.	
6.10 - Night-Time Economy		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-23 Chris McCormack	<p>Night-time street cleaning</p> <p>Submission raises concerns about broken glass on causing a hazard late at night. Suggests mechanism such as whats app group to allow reporting of hazards by members of the public.</p>	<p>CE Response</p> <p>Comments noted. This is an operational uses for the Environment Section and outside the scope of the draft plan.</p>
GLWC-C2-188 Siobhan Fitzgerald GLWC-C2-118 Ibex	<p>More Night Time Economy Needed</p> <p>More night time economy (outside of pubs) needed.</p> <p>Core Component of Wider Experience Economy</p> <p>The night-time economy is a core component of the wider Experience Economy. Incorporating the needs of the night-time economy is key to reimagining our city centres. It can make a significant contribution to the local economy. The Development Plan must actively support the needs of its local night-time economy, which includes rethinking the use of public space and reimagining under-utilised spaces.</p> <p>Galway city must be safe, family-friendly and attractive for inhabitants and visitors alike. Safety and security will influence the attractiveness of the city centre to those wishing to live, work or visit.</p>	<p>CE Response</p> <p>Comments are noted. The night-time economy will play a core component in the wider Experience Economy. There is a section dedicated under 6.10 of the plan entitled Night-time Economy to support the need and offerings for diversification in night time economy. This section of the plan references the <i>Report of the Night-Time Economy Taskforce (2021)</i> DTCAGSM highlighted the challenges and opportunities that exist for developing social, cultural and economic activity during specific evening and night-time hours in town and city centres. The intent is that the range of activities supported should be inclusive, suit all ages, abilities and interests and be a safe environment supported by flexible transport options. Galway City is also in the process of applying to be included as Pilot in the Night Time Economy Initiative.</p> <p>Text in this section supports advancing and diversifying night-time entertainment, leisure and the creative offerings in the city will create employment, enhance tourism and improve the social atmosphere in the city at night. In turn this will further expand the attractiveness of the city as a destination and support the economy including that relating to both day-time and night-time retailing.</p>

	<p>Policy 6.12(4) Retail Policy supports the development of a vibrant, inclusive, night-time culture and economy through sustainable measures and promote the need for associated transport supports, measures to secure a safe environment, and for diversity in entertainment and creative offerings. There is a proposed amendment to this wording as proposed in the Chapter 6 recommendations.</p> <p>The policy and text in addition to the forthcoming LECP and Joint Tourism Destination Brand for Galway, being prepared with Galway City Council and County Council in partnership with Fáilte Ireland which will further develop the Experience Economy.</p>	
GLWC-C2-201 Galway City Alcohol Forum	<p>Proposed Development Assessments for Night-time Economy</p> <p>Commit to undertaking a health and wellbeing impact assessment in relation to any proposed development of the night time economy</p>	<p>CE Response</p> <p>This is generally outside the scope of the plan. It should be noted that the SEA does take into account public health.</p>
GLWC-C2-150 Angela Casey	<p>Purple Flag- Specific Policy should be included for protection of Residential Areas</p> <p>The reference to Purple Flag award and night-time economy at Section 10.2 of the draft plan do not address the significant negative impacts on residential areas from these developments. The protection of inner city residential communities from the negative impacts must be an objective of the draft Plan, otherwise commerce will trump amenity. The submission references the "Party Vehicles" which promotes outdoor drinking through road closures. The impact from purple flag developments on health and safety of residents, particularly where it is proposed to divert traffic from proposed road closures into Munster Avenue, must be assessed.</p> <p>The current road closure proposals will have, and the closures in 2021 had, the effect that an ambulance or fire</p>	<p>CE Response</p> <p>The Purple Flag Award for excellence in managing the evening and night-time economy is important in the city centre, reflecting the image of the city as an attractive and safe destination. These measures will be further enhanced through urban greening, application of clean energies and use of smart technology adding to a "smart, green and clean" city centre as provided for in text on page 241.</p> <p>Concerns with impacts on residential amenity are noted, however complaints with "Party Vehicles", road closures, noise and outdoor drinking is outside the remit of the development plan and is dealt with under different code and enforcement regimes.</p>

	<p>brigade could not access properties in Munster Avenue in the case of an emergency. The negative impact from “Party Vehicles” parking while awaiting customers. What regulation exists to control the use of these vehicles, and how is it enforced? The negative impact from use of “Party Vehicles” should be addressed in the draft plan; instead of acknowledging the potential negative impacts and consequences of Purple Flag developments, the draft plan is biased and only considers the commercial benefits. A specific policy should be included to ensure purple flag and public realm developments do not contribute to increased noise in residential areas.</p>
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Chapter 6 Recommendations

1. Amend last paragraph in dSection 6.3.10 Creative Economy and Gastronomy Sectors and insert text in green

The Plan through policies and objectives support the development of this sector and encourage further development of the expanding food and beverage sector onto regeneration sites and accommodation of new outdoor markets and dining and enhancement of existing markets through improvements and facilitating investment in the public realm.

2. Amend Policy 6.5 Enterprise and Innovation 3 (b) and insert text in green

Support for the provision of social enterprise incubation infrastructure required for growing and strengthening social enterprise.

3. Amend Section 6.1 Context seventh paragraph and insert text in green

Overall it is not possible to predict how the new and evolving hybrid work models and increased digitisation will impact on commuting patterns or demand for workspaces. This reflects the complexity of such changes which range from complete or partial remote working, off site digital hub arrangements, digital nomad work and other flexible preferences. The National Remote Working Strategy acknowledges that remote working is expected to continue with a majority of employees wishing to adopt a hybrid model. This will provide for increased flexibility for work arrangements and facilitates for a reduction in commuting distances and times. The Strategy supports the development of remote working hub infrastructure. Remote working hubs will offer the potential to access quality office facilities and technology, meeting spaces. As the landscape of work changes so will the implications on spatial planning. This plan needs to support the evolving arrangements and use the monitoring structure over the period of the plan to gauge the need for flexibility to respond to these shifting trends and capitalise on potential opportunities for delivering both economic and sustainable benefits.

4. *Amend first paragraph of Section 6.3(8) Tourism Sector to delete strikethrough and add text in green*

Galway City and County accounted for 59% of the tourist visits in 2019 for the North-West region and benefits greatly both economically and from the added vitality it brings. Prior to the year impacted by the Covid-19 pandemic Galway City and County welcomed 2.7m tourist trips in 2019 (1.7m overseas and 1 million domestic trips) according to Fáilte Irelands Survey of Overseas Travellers and the CSO's published figures on domestic travel. hosted up to 1.7m international tourists and 1 million domestic tourists per year as recorded by Tourism Ireland.

5. *Amend fifth paragraph in Section 6.3.8 Tourism Sector and insert text in green*

Funding under the Destination Town Scheme, Platforms for Growth and Shared Water Facilities Scheme funding streams will further explore the potential of these areas as blueways that can support facilities for tourist activities'

6. Amend Policy 6.8(7) Tourism Sector and insert text in green

Support the preparation and implementation of the forthcoming Regional Tourism Strategies and the continued collaboration with Fáilte Ireland and tourism stakeholders to ensure successful implementation and delivery of these tourism plans.

7. Amend Policy 6.8(8) Tourism Sector and insert text in green

Support the promotion of Business Tourism to actively develop Galway as an events location with the appropriate infrastructure to attract international conferences, sporting, cultural and commercial events.

8. Amend Policy 6.8(9) Tourism Sector and insert text in green

Encourage and support investment in digital technology in the tourism sector, with a particular focus on sectors such as visitor attractions and activities with low digital presence and/or integration.

9. Amend Policy 6.12(4) Retail Hierarchy and insert text in green

Support the development of a vibrant, inclusive, evening and night-time culture and economy through sustainable measures and promote the need for associated transport supports, measures to secure a safe environment, and for diversity in entertainment and creative offerings. **This may include extended opening hours, proposals for outdoor dining and event space, and proposals for the greater utilisation of existing heritage assets.**

10. Amend Policy 8.8(6) Public Realm and insert text in green: (ALSO IN CHAPTER 8 RECOMMENDATIONS)

Promote the important role that public space plays in providing for informal social interaction and maximise opportunities for outdoor gathering places, play areas, **outdoor dining** and outdoor public seating, where appropriate and in accordance with the Public Realm Strategy and accompanying manuals.

11. Amend Policy 6.9(4) Marine Sector and Renewable Energy and insert text in green

Support the sustainable re-development and extension of the Port of Galway and the diversification and expansion of activities subject to environmental, visual, economic viability and transportation considerations **in line with the National Marine Planning Framework (NMFP) 2021, and any successor thereof, or any emerging national ports strategies.**

12. Amend Policy 6.11.3 Retail Strategy and insert text in green

Review the strategies and policies for retailing **and vary the plan if necessary** following the preparation of a **Joint Retail Strategy for the Galway Metropolitan Area** with Galway County Council, to ensure sufficient policy support to create a positive framework for continued vitality and investment in the main retail areas especially the Galway MASP and to ensure an informed and consistent approach to policies relating to shared retailing activities in line with national policy. **The preparation of the Joint Retail Strategy for the Galway Metropolitan Area will be completed within one year of the adoption of the City Development Plan and will be initiated and managed by a joint local authority working group.**

13. Amend Policy 6.1(12.b) to add text in green as per response to OPR Submission 165.

Apply active land use mechanisms to facilitate development of lands at Rahoon and Knocknacarra through a co-ordinated approach in conjunction with the Council, landowners, Dept. of Housing, Local Government and Heritage, Irish Water, National Transport Authority and other stakeholders.

14. Amend Section 6.1 Context insert text in 15th paragraph – outlined in green as follows:

This shift towards Ireland's regions is supported by the enhanced development of the four regional cities of Galway, Limerick, Cork and Waterford. The NPF sees the regions as being supported by these cities and the cities being strengthened in their role as accessible centres of high value employment and services and focal points for investment to enable them to have the widest possible regional influence. **It is noted that National Policy Objective NPO 1c of the National Planning Framework has a target growth of around 115,000 additional people in employment i.e. 450,000 (0.45m) in total in the Northern and Western Region by 2040.** The NPF gives recognition in particular to Galway City's key role as a growth centre and driver for investment and identifies several key growth enabler projects for the Galway MASP area which can support and enhance Galway's economic role.

Chapter 7: Community and Culture

7.1 - Context		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-147 Galway City Community Network	<p>Monitoring UN SDGs</p> <p>Relevant SDGs - SDG 3 Health and Wellbeing, SDG 4 Quality Education, SDG 10, the Reduction of Inequality, SDG 4 Gender Equality. Indicators:</p> <ul style="list-style-type: none"> • SDG 3 Health and Wellbeing - Modification of SDG GFI 3.5.1: Coverage of treatment interventions (pharmacological, psychosocial and rehabilitation and aftercare services). • SDG 4 Quality Education - Partially measured by SDG GFI 4.4.1, the proportion of youth and adults with information and communications technology (ICT) skills, by type of skill. Access to education - SDG GFI 4.5.1 Parity indices (e.g., female/male, rural/urban, bottom/top wealth quintile and others such as disability status, minority groups). • SDG 10 Reduction of Inequality and limited SDG 4 Gender Equality - SDG GFI 10.2.1: Proportion of people living below 50 percent of median income, by sex. • SDG 11 Sustainable and Inclusive Communities and Cities - SDG GFI 11.3.2: Proportion of cities with a direct participation structure of civil society in urban planning and management that operate regularly and democratically; SDG GFI 11.7.1 the average share of the built-up area of cities that is open space for public use for all, by sex, age and persons with disabilities; and SDG GFI 11.a.1 regional development plans that (a) respond to population dynamics; and (b) ensures balanced territorial development. 	<p>CE Response</p> <p>Relevant SDGs are referenced in Chapter 7. Monitoring of indicators is considered in Appendix 1: Implementation and Monitoring.</p>

7.2 - Creative City		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-192 Arts Council / An Chomhairle Ealaíon	<p>Submission from The Arts Council welcomes the recognition given to arts and culture in the plan and request that in relation to policy 7.2 Creative City, the Arts council suggests further clarity be given in relation to delivery of facilities in terms of location, responsibility for delivery and review mechanisms.</p> <p>The Arts Council recommend that an audit of availability/deficiency of arts/culture infrastructure, at a neighbourhood / district level is carried out to facilitate resource allocation and accessibility to meet the needs of the resident population.</p> <p>The Arts Council recommend that the Plan includes that an audit of building stock that Galway City Council makes available for cultural use within the city will inform facilities provision and that such audit shall be reviewed during the lifetime of the plan.</p> <p>The Arts Council recommend that the plan includes that the council ensure that cultural facilities are provided to a standard of quality that reflects the designation, ambition and legacy of the city as a European Capital of Culture; And/or that the Council, in consultation with its Arts Office and with the Arts Council acting in an advisory role, shall prepare a spatial development framework in respect to existing cultural facilities within the city, and the needs for enhanced and/or new infrastructure to meet the cultural requirements of the population based upon an audit and evaluation of existing public facilities made available for arts and culture sectors in the city to a standard proportionate to its designation as a European Capital of Culture.</p> <p>The Arts Council would welcome a specific policy objective to support the development of a feasibility model and pilot project for provision of artist live-work space during the lifetime of the Development Plan and to seek to provide a clear community benefit as part of the project.</p>	<p>CE Response</p> <p>The draft plan recognises the importance of arts and culture to the city's identity and economy. The draft plan supports the implementation of <i>Everybody Matters: A Cultural Sustainability Framework for Galway 2016-2025</i> and <i>New Directions: Galway City Council's Strategic Plan for the Arts 2021-2026</i> which in combination provide the framework to guide the development of arts and culture and associated infrastructure in the city based on identified needs and projected population growth.</p> <p>The draft plan provides specific policy support for the provision of arts and culture facilities at city, district and neighbourhood level (Policy 7.2.3); support for the delivery of key strategic arts and cultural projects as identified in the city's arts and cultural strategies (Policy 7.2.9). In addition, the redevelopment of major Regeneration and Opportunity Sites will require the integration of arts and cultural facilities into their proposals. The Arts Strategy includes an action to carry out an audit of vacant buildings/spaces and their potential to be refurbished as arts spaces. This is supported by the draft plan in policy 7.2.12. Creative City.</p> <p>The point raised regarding the inclusion of policy objective to support the provision of artist live-work spaces during the lifetime of the plan is noted.</p> <p>The point raised regarding the inclusion of policy objective that supports redevelopment/regeneration while protecting the recognisable historical, artistic, architectural, social and cultural value of the property/immediate area is recognised in Policy 8.7 Urban Design and Placemaking.</p>

	<p>The Arts Council suggests inclusion of a policy objective that recognises the habitual value of the historical, artistic, architectural, social and cultural history of the city centre (other than protected structures or architectural conservation areas) which facilitates redevelopment/regeneration opportunities where it is demonstrated that the proposal would not adversely affect a recognisable historical, artistic, architectural, social and cultural value of the property, or to the immediate area.</p> <p>The Arts Council request the inclusion of an objective that recognises and seeks to protect buildings of contemporary architectural significance and that encourage the development of high quality contemporary architecture in public buildings to increase the opportunities for the public to experience buildings and spaces of high architectural quality in their everyday lives.</p>	<p>The request to include a policy objective that recognises and seeks to protect buildings of contemporary architectural significance and that encourage the development of high quality contemporary architecture in public buildings is noted. Any building which is deemed by the planning authority to be of special interest from an architectural, historical, archaeological, artistic, cultural, scientific, social or technical point of view can be entered into the Record of Protected Structures (RPS). Section 10.4 City Centre Regeneration makes reference to the role of contemporary architecture in creating strong identity as part of the city centre regeneration. Policy 8.7.7 Urban Design and Placemaking promotes sustainable and inclusive urban design, urban form and architecture that positively contributes to the city's existing character and distinctiveness.</p> <p>CE Recommendation</p> <p>Amend Policy 7.2 Creative City to add text in green for Policy 7.2.13</p> <p>In conjunction with the Arts Office and in line with the aims of <i>Everyone Matters A Cultural Sustainability Strategy Framework For Galway 2016-2025</i> seek to develop a feasibility model for the provision of artist live-work space during the lifetime of the Development Plan.</p> <p>Amend Policy 7.2 Creative City to add text in green for Policy 7.2.14</p> <p>Promote a high standard, sustainable quality and innovativeness in architecture and design, recognising Places for People - the National Policy on Architecture and the contribution of architecture to culture and its value as an art form.</p>
GLWC-C2-148	<p>Submission calls for the 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.</p>	<p>CE Response</p> <p>The issues raised in the submission are noted. Policy outlined in the draft plan is guided by <i>Everybody Matters: A Cultural Sustainability Framework for Galway 2016-2025</i> and New</p>

	<p>Community proof all arts and cultural infrastructure so that accessibility for all sectors of the community, particularly those that have a disability and/or are socially excluded, marginalised and disadvantaged, is proactively encouraged.</p> <p>Support the establishment of a school of music within the city</p> <p>Submission calls on the Council will provide spaces for art and culture to be created and experienced.</p>	<p><i>Directions: Galway City Council's Strategic Plan for the Arts 2021-2026</i> which in combination provide the framework to guide the development of arts and culture and associated infrastructure in the city and supports participation and engagement in arts and cultural activities. Policy 7.2 supports the development of key strategic arts and cultural infrastructure as identified in the city's cultural and arts strategies including the use of the public outdoor spaces, the provision of a multidisciplinary creative hub and where feasible, the temporary use of vacant buildings for arts and cultural purposes.</p>
<p>GLWC-C2-9 Stephen Moriarty</p> <p>GLWC-C2-229 Friends of Merlin Woods</p>	<p>Submission supports Policy 7.2.10 and suggests that policy text require that public performance in areas of high biodiversity have an environmental plan.</p> <p>Submission suggests that Galway should host a medieval-themed festival to celebrate the city's medieval heritage and Galway would benefit from the development of Irish traditional music and dance in the city as Barcelona promotes flamenco.</p>	<p>CE Response</p> <p>The suggested requirement for an environmental plan for events is noted. Events proposed in areas of sensitive natural environment normally require to be screened for ecological impact in advance of sanction, in addition the Environment section through the Biodiversity Officer will determine suitability or not for such proposals.</p> <p>The promotion of Galway's medieval heritage and traditional music is noted. However the programming of specific events is outside the scope of the Development Plan.</p>
<p>GLWC-C2-9 Stephen Moriarty</p>	<p>Public Art</p> <p>Integrate more public art into the city's public spaces to improve</p> <p>Introduce more statues to the city which can act as landmarks, provide visual links to the city's history, enhance the city's character, and are a means of honoring people with an attachment to the city. Suggestions include: Éamonn Ceannt, Nora Barnacle, Francie Barrett, Fr Michael Griffin, Queen Maedhbh, Lady Gregory, and Gaillimh (the mythical figure the city is supposedly named after).</p> <p>Galway would benefit from a fountain to act as a congregation/meeting place in the city. Suggests - 'The Tribes Fountain', a fountain with representations of the crests of the fourteen tribes</p>	<p>CE Response</p> <p>The comments raised in relation to the provision of public art are noted. Policy 7.2 in the Draft Plan supports the provision of public art as part large scale developments and through the Per Cent for Art scheme. In addition the Galway Public Realm Strategy provides guidance regarding public art within the public realm. At operational level a system of encouraging and curating high quality street art is ongoing and included for through a heads of agreement process between the Arts Office/Community and Enterprise section. The council has also developed through Corporate Services a Draft Naming and Commemorative Policy which will addresses issues regarding statutes and public ornamental structures.</p>

GLWC-C2-148 Galway City Community Network	Submissions call for the provision for alcohol free venues for arts, festivals and music events to create safe and enjoyable environments, accommodating young students, families and individuals from a variety of backgrounds, age-groups and cultures.	CE Response The call for provision of alcohol free venues is noted. Section 6.10 Night Time Economy recognises the importance of supporting a diverse range of activities suitable for all ages, abilities and interests in the context of the Night Time Economy.
GLWC-C2-201 Galway City Alcohol Forum	Submission requests a commitment to health proof any policies and developments on Community and Culture	The draft plan supports the implementation of the Healthy Ireland Framework and the Healthy Galway Strategy. It is considered that the requirement to health proof policies in this section is outside the scope of the Development Plan and is more appropriate to the Local Economic and Community Plan (LECP).
GLWC-C2-202 Galway City Early Years sub-committee of CYPSC		
GLWC-C2-177 Jen Hesnan	<p>Music Generation Galway City is a performance music education service for children and young people in Galway City that will provide opportunities for children and young people to access a range of high quality, subsidised vocal and instrumental tuition in their local area. It is managed and supported locally by The GRETB, Galway City Council, Galway City Partnership, Foróige, Youth Work Ireland and Involve. Initiated by Music Network, Music Generation is co-funded by U2, The Ireland Funds, the Department of Education and Skills and Local Music Education Partnerships (LMEPs).</p> <p>It is vital that Music Generation continues to receive support from Local music Education Partners and Galway City Council to allow it to grow and develop, ensuring access to music education is considered at all levels within our local communities, educational youth settings, festivals and music venues for Galway cities' young people.</p>	CE Response The points raised regarding the Music Generation project are noted. As the development plan is primarily a land use strategy, support this initiative is considered more relevant to the annual Arts Strategy programme.

7.3 - Inclusive City

Submission No.	Submission Summary	CE Response and Recommendation
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GLWC-C2-17 Foróige	Submissions request the development of a youth space/cafe for the West Ward/Knocknacarra area of Galway City for various programmes and events. This should be multifunctional with office space and adjacent to outdoor recreational facilities.	CE Response The development of a youth space/caf�� is outside the scope of the development plan. However, the development plan provides policy support for the provision of all types of community facilities in Policy 7.1 General Policies which includes, in conjunction with other stakeholders, the delivery of key facilities for children and young people in the city.
GLWC-C2-9 Stephen Moriarty	Submission requests that Traveller accommodation should include green space and trees. Halting sites must be properly serviced with waste collections. Provide job opportunities and encourage Travellers to take up apprenticeships. Encourage Traveller traders to attend and participate in city markets as a means of rejuvenating traditional skills in the Traveller community	CE Response The comments regarding the provision of Traveller Specific Accommodation are noted. All Traveller Specific Accommodation is provided in accordance with national standards and Residential Development Standards set out in Section 11.3 of the Draft Plan. Employment and training and participation in markets are outside the scope of the Development Plan.
GLWC-C2-37 Galway Age Friendly Alliance	Submission outlines the importance of opportunities for social participation and community supports as for older people. An age-friendly community should provide opportunities for people to participate in public life and quality community-based health services can keep people healthy and reduce their in-patient and outpatient services. Submission request that the Development Plan support essential community facilities such as community centres and libraries to act as safe and friendly social and cultural community hubs. Support participation and engagement with older people through structures such as the Older Person's Council.	CE Response The contents of the submission is noted. The draft plan recognises the need to support older people to remain healthy and active and connected to their communities through policies to support the provision of life-time adaptable and specialized housing, ensuring the built environment is safe and accessible and that community services and facilities appropriate to needs of older people are provided. The draft plan is underpinned by the 15 Minute City concept where residents have easy access to the necessary community services and facilities within 15 minutes by walking, cycling or public transport. In addition, proposed amendments to Chapter 11 will make provision for housing suitable for older people.
GLWC-C2-148 Galway City	UN Convention on the Rights of People with Disabilities The submission requests that the language in the plan should reflect Galway City Council's legal obligation to implement the	CE Response The contents of the submission is noted. The implementation of the UNCRPD is coordinated by the Department of Children,

Community Network	<p>UNCRPD and be changed from 'to support the implementation' to 'to implement'.</p> <p>Submission request that the following are included under Policy 7.3 Inclusive City:</p> <ol style="list-style-type: none"> 1. The Council will develop a comprehensive Access Strategy through engagement with disabled people and disability organisations. 2. The Council will establish a coordination mechanism in line with requirements set out in UNCRPD. The Council will appoint a dedicated Access Officer to implement the Access Strategy 	<p>Equality, Disability, Integration and Youth and primarily driven by the National Disability Inclusion Strategy (NDIS) and the Comprehensive Employment Strategy for People with Disabilities (CES) which are the key, whole of Government, frameworks to address the needs of persons with disabilities in Ireland and which support effective progress in delivering on the obligations set out in the UNCRPD. Reference to the NDIS is also included in Section 4.6 Road and Street Network under Accessibility paragraph 2.</p> <p>It is considered that the current text in Section 7.3 Inclusive City reflects the Council's legal obligations under the UNCRPD and its joint responsibility with other key stakeholders to work collaboratively to support implementation at local level.</p> <p>The development and implementation of an access strategy is outside the scope of the development plan and is more relevant to the objectives of the LECP. However the draft plan is committed to carrying out an audit of existing roads, public realm spaces in order to identify specific locations which require modification to improve accessibility (Policy 8.10.16).</p> <p>CE Recommendation</p> <p>Amend Preface to include reference to UN Convention on the Rights of Persons with Disabilities (UNCRPD) as a guiding document in the Strategic Policy Framework.</p>
GLWC-C2-153 People Before Profit Galway	<p>Submission requests that UNCRPD, ratified by Ireland in 2018, be included before the Barcelona Declaration of 1995 under 7.3 Inclusive City as follows:</p>	<p>CE Response</p> <p>The requests are noted.</p> <p>CE Recommendation</p> <p>Amend Section 7.3 Inclusive City, People with disabilities to delete strike-through text and add text in green</p> <p>People with disabilities</p>

<p>equal civil and political, social and economic rights across all sectors. Per these obligations, the Council will work with relevant stakeholders to support the implementation of the UNCRPD at the local level. In addition, the Council is a signatory to the Barcelona Declaration of 1995, which promotes universal access in the public realm, public buildings and services and encourages participation of people with disabilities in the social, economic and cultural life of the city. Galway City Council supports the installation of Changing Places facilities (specialised toilet facilities) in the City and particularly in recreational and amenity spaces. In addition, Galway City Council supports and encourages the provision of these facilities in any new building developments where the public have access in large numbers, such as, educational establishments, cultural buildings, health facilities and sport and leisure facilities. Ireland ratified the UN Convention on the Rights of People with Disabilities (UNCRPD) in 2018. This places an obligation on the Irish state to ensure people with disabilities have equal civil and political, social and economic rights across all sectors. Having regard to obligations under the UNCRPD the Council will work with relevant stakeholders to support the implementation of the UNCRPD at local level. The Council will continue to support the development of a high quality, inclusive, accessible and affordable housing, transport, employment, built environment and public realm through the implementation of disability legislation, the building regulations, Universal Design Guidelines and the Galway City Public Realm Strategy.</p> <p>PAGE 192 (Page 190 in actual plan), under Policy 7.3 Inclusive City:</p> <p>2. Proactively promote the various aims of the Council to give effect to the UNCRPD as well as the Barcelona Declaration and support universal design principles to make Galway a more accessible and disability friendly city.</p> <p>7. Co-operate with the Access for All Network and other organisations representing people with disabilities to provide equal access for all</p>	<p>Galway City Council is committed to working with people with disabilities and their representative groups to facilitate their access to housing, transport, employment and the built environment. Ireland's ratification of the UN Convention on the Rights of People with Disabilities (UNCRPD) in 2018 places an obligation on the Irish state to ensure people with disabilities have equal civil and political, social and economic rights across all sectors. Having regard to obligations under the UNCRPD, the Council will work with relevant stakeholders to support the implementation of the UNCRPD at the local level. In addition, the Council is a signatory to the Barcelona Declaration of 1995, which promotes universal access in the public realm, public buildings and services and encourages participation of people with disabilities in the social, economic and cultural life of the city.</p> <p>Galway City Council would support supports the installation of Changing Places facilities (specialised toilet facilities) in the City and particularly in recreational and amenity spaces. In addition, Galway City Council supports and encourages the provision of these facilities in any new building developments where the public have access in large numbers, such as, educational establishments, cultural buildings, health facilities and sport and leisure facilities. The Council will continue to support the development of a high quality, inclusive, accessible and affordable housing, transport, employment, built environment and public realm through the implementation of disability legislation, the building regulations, Universal Design Guidelines and the Galway City Public Realm Strategy</p> <p>Amend Policy 7.3 Inclusive City to include text in green</p> <p>7.3.2 Proactively promote the various aims of the Council to give effect to the UNCRPD, Barcelona Declaration and support universal design principles to make Galway a more accessible and disability friendly city.</p>
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	<p>citizens particularly in the area of housing, transport, employment, built environment and the public realm within the city.</p>	<p>7.3.7 Co-operate with the Access for All Network and other organisations representing people with disabilities to provide equal access for all citizens particularly in the area of housing, transport, employment, built environment and the public realm within the city.</p>
GLWC-C2-148 Galway City Community Network	<p>Submission requests that Policy 7.3 Inclusive City include:</p> <ol style="list-style-type: none"> 1. The Council will promote quality employment opportunities and career advancement for persons with disabilities in GCC. 2. The Council will promote opportunities for self-employment, social enterprises, entrepreneurship, the development of cooperatives and starting one's own business through GCC Enterprise Unit. 3. The Council will promote the provision of appropriate accommodation for disabled people in the workplace. 	<p>CE Response</p> <p>The issues raised in the submission are noted. The provision of employment, working accommodation and enterprise support are more relevant to the objectives of the LECP and outside the scope of the development plan.</p>
GLWC-C2-148 Galway City Community Network	<p>Accessible community facilities</p> <ol style="list-style-type: none"> 1. Ensure that all community facilities are fully accessible and based on universal design principles, best practice and commitment to UNCRPD. Map current facilities against accessibility, including parks and playgrounds for children and young people with disabilities. Undertake remedial action where required. 2. Ensure that facilities are retained in community ownership and management with the support of community enterprises or local cooperatives. Access by the community needs to be retained as an absolute priority and 'innovative' models of delivery, ownership and management must not include developer-led or private ownership of community facilities. 3. Provision for resource centres where older people can access services, community supports and information in the centre and in the suburbs similar to the Westside Resource Centre and the Ballybane Resource Centre. 	<p>CE Response</p> <p>The issues raised are noted. Policy 7.5 Community Facilities ensures at all community facilities are designed in accordance with Building for Everyone - Universal Design Guidance. Over the life time of the development plan an audit of community facilities will be carried out to assess gaps in provision and demand for facilities.</p> <p>The ownership of community facilities is relevant to the LECP and outside the scope of the development plan.</p> <p>Policy in the development plan supports the balanced and equitable provision of community services and facilities in collaboration with key stakeholders throughout the city. The operation of specific services such as an information hub is relevant to the LECP and out the scope of the development plan.</p>
GLWC-C2-82 Aran Murray	<p>Submission request the creation of more gender neutral places to socialise including an increase in Gender neutral areas for child and teen socializing including spaces for children age 10 and up and in particular females. Provide facilities for a diverse range of sports including tennis and basketball.</p>	<p>CE Response</p> <p>The contents of the submission are noted. The draft plan, in its function as a land use plan, and the Galway City Public Realm Strategy 2019 support the delivery of a variety of accessible and inclusive recreation, amenity and public spaces designed to</p>

		support a diversity of use. The Green Space Strategy will further consider safety and inclusivity in the provision recreation and amenity spaces.
GLWC-C2-177 Jen Hesnan	Submission refers to the role of digital youth work in making youth work services more accessible and relevant to young people and requests investment in Galway City's Youth Services and Youth Spaces and emerging trends in the field of Digital Youth Work.	CE Response The contents of submission is noted. The development of digital youth work and associated services and infrastructure is outside the scope of the city development plan. Specific measures regarding digital youth would be more appropriately included as part of the LECP.
GLWC-C2-196 COPE Galway	Submission is concerned that the following statement: ' <i>The Council seeks to prevent undue segregation through application of the Housing Strategy 2023-29. It encourages a variety of house types and sizes throughout the city to cater for all including families, single person households and those with specialist housing needs such as members of the Traveller Community, older people, people with disabilities and people who are homeless</i> ' Identifying those who are homeless as a separate group may cause stigma and could lead to misconceptions and misunderstanding as to what homelessness is. Submission request the removal of 'where feasible' from Policy 7.3.1 as COPE Galway believes that inclusion is vital and not something that should only be considered if it is feasible.	CE Response The content of the submission is noted. Homeless households are categorised as households of specialist need in <i>Guidance on the Preparation of a Housing Need and Demand Assessment</i> and are required to be identified as part of the preparation of the Housing Strategy. The use of 'where feasible' reflects constraints that exist within the built and natural environment.
GLWC-C2-97 Architecture at the Edge	Submission considers that there should be greater emphasis on the provision of recreation facilities for young aged 15-24 and requests that Galway as a Child Friendly City Report (2000) be updated in consultation with the current generation of young people. Submission requests that Galway City Council to provide a high-profile platform for young people aged 15–24 to express their aspirations for the future of Galway's built environment . Submission includes points for action including: <ul style="list-style-type: none">• Let young people have their say and will be fully involved in planning, designing and decision-making in their city. They can	CE Response The content of the submission is noted. The draft plan and the Galway City Public Realm Strategy 2019 support the delivery of a variety of accessible and inclusive recreation, amenity and public spaces designed to support a diversity of use. The Council agree that the participation of young people is important, however the provision of a platform for young people outside of the development plan's statutory consultation process is outside of the scope of the development plan. Nonetheless, the forthcoming

	<p>help improve places and spaces and they'll use and respect them more if we've been asked.</p> <ul style="list-style-type: none"> We want every generation to have their own corner in public spaces, acknowledging their needs and making them feel welcome- Separating activity zones for small children, teenagers, adults and senior citizens through soft zoning (floor markings, tree fences, etc) will ensure everyone feels happy about sharing the same public space. 	Green Space Strategy will offer an opportunity to consider the provision of recreation facilities for young people aged 15-24.
GLWC-C2-182 Reform, Central Policy and Communications Division - Dept. of Transport	<p>National Disability Inclusion Strategy (NDIS) 2017-2022,</p> <p>With regard to ensuring accessibility, the Dept. of Transport request that the National Disability Inclusion Strategy (NDIS) 2017-2022, which includes specific actions assigned to Local Authorities be reflected in the draft plan and notes the references to UNCRPD in the plan</p>	<p>CE Response</p> <p>The contents of the submission are noted and are addressed in Section 4.6. Road and Street Network under Accessibility.</p>

7.4 - Bilingual City

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-148 Galway City Community Network	Submission calls for Support a multi-lingual Galway, acknowledging the diversity that is an increasing and welcome feature of the city.	<p>CE Response</p> <p>The contents of the submission are noted. The inclusion of Bilingual City reflects the legislative status given to the Irish language and Galway's designation as Gaeltacht Service Town and does not inhibit the promotion of any other language. A Strategic Goal of the Plan is to make Galway an '<i>equal and inclusive city</i>'.</p>
GLWC-C2-157 Gaillimh le Gaeilge	<p>Submissions refer to the importance that young people are provided with opportunities to develop confidence in using the Irish language though implementation of the Galway City Language Plan.</p> <p>Submissions call for engagement with primary and post primary schools in the city with a view to collaborating with them in developing initiatives</p>	<p>CE Response</p> <p>The contents of the submission are noted. The importance of providing opportunities for young people to develop their Irish language skills is acknowledged as is the valuable work carried out by schools in promoting the Irish language. Policy 7.4 Bilingual</p>

GLWC-C2-177 Jen Hesnan	<p>that have the objective of encouraging pupils to avail of the opportunities that exist to use Irish outside of the school system.</p>	<p>City recognises the importance of the Irish language to the city and supports the implementation of city's Irish Language Plan. The development of cultural and linguistic initiatives is outside the scope of the development plan.</p> <p>It is considered appropriate to amend policy 7.4.4 to include reference to Language Plans for Bearna & Cnoc na Cathrach LPA, Galway City East LPA and the Eachréidh LPA.</p> <p>CE Recommendation</p> <p>Amend policy 7.4.4 Bilingual City to add text in green</p> <p>Support the implementation of the Plean Tenga Chathair na Gaillimhe 2020-2026 and the designation of the city as a Gaeltacht Service Town. Support the implementation of language plans for Bearna & Cnoc na Cathrach LPA, Galway City East LPA and the Eachréidh LPA.</p>
GLWC-C2-157 Gaillimh le Gaeilge	<p>Submission calls for the provision of Irish-medium second level schools in parts of Galway City not currently serviced by such schools, with the aim of increasing participation in Irish medium education at second level.</p>	<p>CE Response</p> <p>The contents of the submission are noted. The requirement for the establishment of Irish-medium post primary school will be considered in collaboration with the Department of Education and all relevant stakeholders as it outside the scope of the development plan to define.</p>
GLWC-C2-157 Gaillimh le Gaeilge	<p>Submission requests that where feasible, all new and replacement signage on business premises, awnings, and seating enclosures will include some Irish wording. (50:50 Gaeilge/English preferred). Both languages to be equal in size, clarity, and legibility.</p>	<p>CE Response</p> <p>The contents of the submission are noted. It is considered that Policy 6.11.8 Retail Strategy and Policy 7.4.2 Bilingual City are sufficient to support the provision of bilingual signage. The policies support Irish language and bilingual signage and promote the use of the Irish language in the naming of new residential developments, public roads and parks and encourage the use of Irish/bilingual signage in the commercial and public realm.</p>

GLWC-C2-58 Údarás na Gaeltachta	<p>Submission from Údarás na Gaeltachta requests that the Galway City East LPA and the Eachréidh LPA are included on the map of Gaeltacht areas (Fig 7.3) as language plans have been prepared for the Galway City East LPA (located entirely within the Galway City area), the Bearna & Knocknacarragh LPA and the Eachréidh LPA (which include areas that are situate within the metropolitan area), and should be recognised as part of the draft plan.</p> <p>Submission raises concerns about referrals of planning applications and make reference to county development plans, rural housing and the need for language conditions to be attached to major housing schemes.</p> <p>Submission refers to the role of Údarás which is an enterprise development agent in the Gaeltacht should be recognized in the plan and reference to the employment development possibilities of the Gaeltacht should also be made which include tourism, including the Connemara way and Galway Clifden and Galway Bearna Greenway; enterprise and renewable energy; the green, blue and digital economy.</p> <p>Submission requests that In relation to community culture and education, that language matters be taken into account in relation to health care services in Gaeltacht areas and reflected in the plan.</p>	<p>CE Response</p> <p>The point raised regarding the request for inclusion of the LPAs in Section 7.4 and Figure 7.3 is noted.</p> <p>References to referral of planning applications and Galway County Development Plan are noted. References relating to rural housing are outside the scope of the Galway City Development Plan. It is considered not appropriate to apply language conditions which impose restrictions on occupancy of property in the city, which promotes diversity and access for all.</p> <p>Noted</p> <p>Outside the scope of the development plan.</p> <p>CE Recommendation</p> <p>Amend Figure 7.3 <i>Map of Gealtahct Areas in Galway City</i> to show language planning areas</p> <p>Amend policy 7.4.4 Bilingual City to include reference to Language Plans for Galway City East LPA and Bearna & Cnoc na Cathrach LPA and the Eachréidh LPA.</p>
GLWC-C2-123 Owen Hanley	<p>Submission supports submission from Údarás na Gaeltachta in relation to the recognition and/or designation of Gaeltacht areas within the city and those covered by the Pleanála Teanga. I would make special mention of the Phleananna Teanga Oirtheor Chathair na Gaillimhe which represents an exciting opportunity to support our Gaeltacht communities on the East side of the city and build on the cultural roots in this area.</p>	<p>CE Response</p> <p>The contents of the submission are noted.</p> <p>CE Recommendation</p>

		Amend policy 7.4.4 Bilingual City to include reference to Language Plans for Galway City East LPA and Bearna & Cnoc na Cathrach LPA and the Eachréidh LPA.
GLWC-C2-129 Conradh na Gaeilge	<p>Submission from Conradh na Gaeilge requests new policy in Policy 7.4.4 - Support the implementation of the Bearna and Knocknacarragh and Galway City East Language Plans'</p> <p>Submission makes reReference to housing planning in the Gaeltacht areas. The Council has legal obligations under the Planning and Development Act 2000 10 (2) (m), which states '(m) the protection of the linguistic and cultural heritage of the Gaeltacht including the promotion of Irish as the community language, where there is a Gaeltacht area in the area of the development plan. Conradh na Gaeilge recommends that the items stated in the Draft Galway County Plan regarding planning in the Gaeltacht be included in this draft plan so that the planning proposals are the same in the city and the county, as a language planning area is shared between the city and county, that is Bearna and Knocknacarragh.</p> <p>Submission refers to a 'lack of awareness and ignorance in the planning section regarding its responsibilities for the protection of the Irish language in the Gaeltacht regarding planning was demonstrated to the Joint Committee on the Irish Language, the Gaeltacht and the Irish Speaking Community on 19 January, 2022, Joint Committee on the Irish Language, the Gaeltacht and the Irish Speaking Community - Wednesday, 19 Jan 2022 (oireachtas.ie). For example, Senior Planner Caroline Phelan pronounced 'We have a unique position with regard to the Gaeltacht in that we are an urban authority and do not have legislative discretion to ring-fence specific areas, housing or aspects such as that, specifically for Irish speakers, because we would be challenged with other groups which would claim a right to live in the city and be cross-subsidised in that manner as well.' The council has a legal obligation regarding Irish speakers in the Gaeltacht as mentioned above. The planning department as a whole needs to read the Planning and Development Act 2000 in its entirety to ensure that the department correctly understand it. It may be worth contacting An Bord Pleanála or An Coimisinéir Teanga to request a short course for the planning</p>	<p>CE Response</p> <p>The point raised regarding the request for inclusion of the LPAs in Section 7.4 is noted.</p> <p>The Council is cognizant of its obligations under the Planning and Development Act, 2000 regarding the protection and promotion of the Irish language and this is reflected in Policy 7.4 Bilingual City.</p> <p>The point raised is noted.</p>

<p>department. It is also worth employing a qualified sociolinguist to carry out a language impact assessment of planning applications in the Gaeltacht.</p> <p>Submission commends the council's policy of naming all new housing developments in the city in Irish only.</p> <p>The Council is required to provide all funding, staffing and other support, as required, to support the Bearna and Knocknacarragh, the Galway City East and the Galway City Gaeltacht Service Town Language Plans.</p> <p>Galway City Council is the only local authority of all the local authorities in charge of Gaeltacht areas in which do not have 'An Ghaeltacht' signs erected on the edge of Gaeltacht areas. As a result of this even those living in the Gaeltacht may not even notice that there is a Gaeltacht in Galway City.</p> <p>If a planning application is received from the people of the Gaeltacht every effort should be made to approve the planning application to ensure that the people of the Gaeltacht will be able to remain in their native area. If members of the local community have land and want to build a dwelling house on their own land, they should be supported rather than hindered.</p> <p>Planning and Development in the Gaeltacht' chapter of the 20 Year Strategy for the Irish Language is worth examining regarding this aspect of planning with the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media and the Department of Housing, Local Government and Heritage to check if it contains guidelines that can be implemented in the Development Plan.</p> <p>Laws, guidelines and rules need to be reviewed to explore how to build affordable homes more easily. At present there are obstacles to Údarás na Gaeltachta building affordable homes due to this excessive bureaucracy.</p> <p>This plan cannot be considered as no monitoring report has been made in relation to the plan. It is worth noting that annual monitoring reports will be useful in preparing this new plan.</p>	<p>The point raised is noted.</p> <p>The point raised is noted. However it is considered to be outside the scope of the development plan.</p> <p>The point raised is noted and is outside the scope of the development plan.</p> <p>The point raised is noted. However it is not considered appropriate to apply language conditions or impose restrictions on property in the city, which promotes diversity and access for all.</p> <p>The point raised is noted.</p> <p>The point raised is noted.</p> <p>Appendix 1 details monitoring and implementation of the development plan.</p>
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		CE Recommendation Amend policy 7.4.4 to include reference to Language Plans for Galway City East LPA and Bearna & Cnoc na Cathrach LPA and the Eachréidh LPA.
GLWC-C2-9 Stephen Moriarty	Submission wishes to encourage bilingual labelling on products in shops	CE Response The contents of the submission are noted. The labelling of products is outside the scope of the development plan
7.5 - Community Facilities		
Submission No.	Submission Summary	CE Response and recommendation
GLWC-C2-148 Galway City Community Network	<p>Community Facilities</p> <p>Submission highlights the importance of the development of a network of community hubs in the city that are interdisciplinary (community, education, arts etc.), free of charge, accessible and on public transport routes, prioritising the areas where there is least availability currently.</p> <p>Submission requests the provision of community policing, neighbourhood watches and traffic calming devices within local communities</p>	<p>CE Response</p> <p>The contents of the submission are noted. Community facilities and infrastructure are recognised in the development plan as an integral element in building a sustainable communities. Support for the provision of community facilities is interwoven through the draft plan by way of policy, specific objectives and zoning designations. The draft plan aims to provide community services and facilities of a nature and scale appropriate to the needs of local communities and in tandem with residential development. Regarding the creation of community hubs Chapter 7 includes specific policy support in Policy 7.1 which promotes the co-location of community services and infrastructure and design flexibility to allow buildings to be adapted for a variety of uses. Policy 7.5 Community Facilities supports the location and concentration of community services and facilities in accordance with the '15-Minute City' concept which ensures that community facilities are located in close proximity to where people live and are easily accessible by walking, cycling and public transport.</p> <p>The draft plan also includes a commitment to carry out a Social and Community Infrastructure Audit in conjunction with the LECP and all relevant stakeholders which will explore current provision, areas</p>

		<p>of demand and opportunities for multi-purpose use. The LECP will also support the identification of investment and delivery of community facilities at a local level.</p> <p>The provision of community policing, neighbourhood watches and traffic calming devices within local communities are outside the remit of the development plan.</p>
<p>GLWC-C2-85 East of the Corrib: Terryland- Castlegar- Ballinfoile Community Stakeholders</p> <p>GLWC-C2-127 Roselyn Carroll</p> <p>GLWC-C2-171 Roselyn Carroll</p>	<p>Ballinfoile Castlegar Neighbourhood Centre (BCNC)</p> <p>Submissions request the development of an Urban Village that comprises multiple buildings, services and facilities in the location Ballinfoile Castlegar Neighbourhood Centre that connects Castlegar village and school including:</p> <ul style="list-style-type: none"> • Support the development of 3 or more 'nature based' playgrounds close to BCNC and on Terryland Forest Park • Deliver a Library in the Urban Village • Extend BCNC to include, but not limited to: all weather Astro, changing facilities, squash courts, tennis courts, basketball courts, hackerspace/digital makers, skate park, running track, youth space, community cafe. • Improve provision of childcare facilities to include outdoor learning facilities, afterschool provision and access to sports and the arts for all children living in Ballinfoile Mor Community, including the halting sites. • Provide space for local family support centre provide a centre for education • Deliver a plan that includes for the provision of Playgrounds, Youth friendly open spaces, childcare facilities with generous outdoor dedicated areas, healthcare facilities, local family support centre and centre for education. • Deliver a development of a multi-use community complex to include but not be restricted to floodlit grass and Astro turf playing facilities, community training and performance space, multi-purpose meeting rooms, changing facilities and outdoor training 	<p>CE Response</p> <p>The contents of the submission are noted. Support for the provision of community facilities is interwoven through the draft plan by way of policy, specific objectives and zoning designations. The draft plan aims to provide community services and facilities of a nature and scale appropriate to the needs of local communities and in tandem with residential development. Regarding the creation of an Urban Village, Chapter 7 includes specific policy support in Policy 7.1 which promotes the co-location of community services and infrastructure and design flexibility to allow buildings to be adapted for a variety of uses.</p> <p>A Social and Community Infrastructure Audit will be carried out, in conjunction with the LECP/LCDC and all relevant stakeholders to inform the requirements for community facilities in new and existing communities in the city during the lifetime of the development plan. The audit will identify gaps in the provision of social and community facilities and highlight areas requiring investment by a range of bodies.</p> <p>The forthcoming Greenspace Strategy will consider the provision of recreation and amenity facilities including playgrounds.</p>

	areas with enhanced walkways in lands surrounding BCNC on the Headford Road, as per Section 5.10 Item 37.	
GLWC-C2-151 Nikunj Sakhrelia	Submission requests the provision of a multipurpose center which can be used to host various indoor events and available to community to host religious events and functions, Current community centers are not built for multipurpose, each center right now are not suitable for certain religious events which require food serving and use of powder colors.	CE Response The contents of the submission are noted. The facilitation of a multipurpose community facility for religions events is compatible with Land Use Zoning Objectives CF: Institutional and Community, CC: City Centre and R: Residential supports the provision and is open for consideration under Land Use Zoning Objective Commercial/Industrial CI.
GLWC-C2-229 Friends of Merlin Woods	Submission from the HSE advise that it is intended to implement a two site strategy on their hospitals in the city, with UGH focusing on acute and trauma care, and MPUH focusing on elective and ambulatory care.	CE Response The contents of the submission are noted. The development plan supports the development and expansion of healthcare facilities in the city and recognises the importance of UHG and MPUH as regional health care providers.
GLWC-C2-162 HSE	<p>Submission requests an additional policy insertion to Policy 7.8 to be specific to support and facilitate the sustainable development of a new Emergency Department and all necessary and ancillary development at University Hospital Galway (UHG) to ensure the continued growth of the hospital</p> <p>Submission requests an additional policy insertion in Policy 7.8 to support and facilitate the sustainable development of all necessary and ancillary development at Merlin Park University Hospital (MPUH) to ensure the continued growth of the hospital.</p> <p>Submission from Friends of Merlin Park support for the delivery of an enhanced Regional Centre within the existing lands of MPUH as long as existing woodland habitats and veteran trees are protected and not impacted by development.</p>	<p>Any proposed development allied to MPUH will be assessed in the context of CF zoned lands. All planning applications will include assessment of the existing context, including the natural environment and will require landscaping proposals.</p> <p>CE Recommendation</p> <p>Amend Policy 7.8. Insert new text in green as policy no.5</p> <p>Support the delivery of key strategic healthcare infrastructure, including a new Elective Hospital, within the city.</p>
GLWC-C2-182 Reform, Central Policy and Communications Division - Dept. of Transport	<p>Helicopter Landing Site (HLS)</p> <ul style="list-style-type: none"> The Dept. of Transport outlines the use of the Helicopter Landing Site (HLS) located at University Hospital Galway (UHG) and recommends that the plan recognises its strategic importance in supporting a wide range of stakeholders and that due consideration is taken of any specific HSE recommendation regarding safety and 	CE Response The content of this submission is noted and is addressed in Chapter 11 as specific objective on RA zoned lands. See also CE report section on Chapter 11.

GLWC-C2-162 HSE	<p>spatial requirements including simultaneous use by more than one emergency aviation service provider.</p> <ul style="list-style-type: none"> The HSE advise that in relation to the Air Ambulance service that there is currently a permanent facility within the UHG campus and an additional facility located on the lands zoned as Open Space, to the north-west which is used on a temporary emergency basis at times when the permanent facility is occasionally closed. The HSE request that an additional policy be inserted in the plan to support the need for Air Ambulance services at UHG and MPUH, the continued use of the temporary service in place on amenity lands as necessary and enter into discussions with the HSE relating to the provision of a single permanent Air Ambulance heliport service at an appropriate location to serve the UHG campus during the plan period. 	
GLWC-C2-172 Department of Education	<ul style="list-style-type: none"> The Department of Education states that the existing network of schools that serve the city are of critical importance in meeting the potential increased requirement for school places arising from increased city population. The Department of Education uses a number of parameters to determine future needs and is cognisant that variances in factors such as household sizes, demographic profiles and housing delivery rates could significantly alter the future school accommodation requirements. Requirements at primary level are currently assessed on 11.5% of population and 25 students per classroom. Post-primary requirements are assessed at 7.5% of population numbers. The Department states that their strong preference is to more intensively develop the existing school network in the city to meet the increased school place requirements arising from intensification of residential development. In this regard, the protection of the existing schools and any land buffers around them to enable their expansion is critical. The Department requests that Policy 7.6 Education be strengthened to emphasise this more strongly. The existing network of schools in Galway City comprises 25 primary schools, 12 post primary schools and 5 special schools. The department has examined the location of existing schools in the context of the Draft Plan neighbourhood areas and 	<p>CE Response</p> <p>The points raised regarding the provision of education facilities are noted. The council will continue to engage with the Department of Education with regard to the provision of school accommodation in the city by providing data on housing delivery and as part of the development of Regeneration and Opportunity Sites, the preparation of LAPs and as part of large scale residential developments. The council is committed to supporting the Department in identifying a post-primary school site in the east of the city. The provision of education facilities is compatible with a range of Land Use Zoning Objectives</p> <p>Regarding the expansion of existing schools in the Inner Residential West neighbourhood, the council is supportive of the expansion of existing school accommodation on site subject to normal planning considerations.</p> <p>Regarding the request to update Policy 3.3 Sustainable Neighbourhood Concept to include reference to community facilities, it is not considered necessary as the term social infrastructure encompasses community facilities including schools.</p>

	<p>regeneration and opportunity sites and the likely additional demand for school places.</p> <ul style="list-style-type: none"> • The Department suggests that Policy 3.3 Sustainable Neighbourhood Concept should include a reference to community facilities (which would include schools). The Department welcomes engagement with Galway City Council and will continue to work closely with the Council in relation to the development of existing schools and the provision of new schools. • The Department states that the Regeneration and Opportunity sites in the city centre and at Sandy Road will create an increased demand for school places and will require liaison between the Department and the Council as the plans develop for these sites. • In the Inner Residential West neighbourhood, the six primary schools in this general area would indicate that expansion of existing school(s) would seem to be the most feasible option. • The Department will welcome the opportunity to engage with the Headford Road LAP. A school site may be required to be included to meet school place requirements of the new population in this area plus the potential educational requirements arising from the nearby Sandy Road development site. • Significant residential development is proposed for lands in Castlegar and the capacity to meet the requirements of the increased population will have to be assessed. • Similarly in the east the regeneration and opportunity sites will result in increased demand and the capacity of existing schools will have to be assessed. • At post-primary level, students would have to travel to the post-primary schools in the City or in the East of the City. • All the regeneration sites will contribute to a requirement for increased post-primary school places. • The Department urgently seek a permanent site for the Educate Together post primary school which serves both a city and county catchment and consider Ardaun designated sites not to be deliverable in the short term and needed to meet the future population needs of Ardaun. The Department advise that a site has been identified at Garraun. 	CE Recommendation
GLWC-C2-74 Galway Educate	Submission from the Board of Management of Galway Educate Together Secondary School requests that Galway City Council makes	CE Response

Together Secondary School	<p>provision in the Galway City Development Plan 2023 – 2029 for a permanent and suitable site for Galway ETSS. It requests that a 4.57 hectare site is zoned for a new school for Galway ETSS on the east side of the city at a location that is accessible in a sustainable manner to students from all areas of the combined Galway City / Oranmore school planning areas. The Board of Management requests that a site in the vicinity of Grianach House, Murrough or in an area with similar levels of sustainable accessibility, be zoned to provide for the permanent site for Galway ETSS.</p>	<p>The contents of the submission are noted. The Council has engaged with the Department of Education and the Principal of Galway Educate Together Secondary School regarding need for a permanent site for the school. The Council notes that Ardaun LAP includes a site zoned for educational purposes which was designated in collaboration with the Department of Education and is suitable for such use. The draft plan also includes specific policy support for provision of education facilities.</p> <ul style="list-style-type: none"> • Residential (R) zoned lands at Merlin Park Lane, Doughiska Road shown on Figure 11.9 of the Draft Plan include for a specific objective relating to the provision of <i>community facilities in particular for education purposes are open for consideration on these lands</i>. • Specific Objective 7.7.13 - <i>Support the development of a permanent site for a post primary school in the East of the city.</i> • Specific Objective 7.7.12 <i>Work with relevant stakeholders and service providers to investigate the delivery of community facilities to serve the community of Ballybane including:</i> <ul style="list-style-type: none"> • <i>A Family Resource Centre in conjunction with TUSLA;</i> • <i>A community crèche and early years education service;</i> • <i>Outdoor and indoor amenities for all age groups;</i> • <i>A Primary and secondary school in conjunction with the Department of Education</i>
GLWC-C2-123 Owen Hanley	<p>Submission supports submission from Board of Management of Galway Educate Together Secondary School.</p>	<p>CE Response The contents of the submission are noted and addressed above.</p>
GLWC-C2-171 Roselyn Carroll	<p>Submission calls for the location of a secondary school on East of the city in location based on population analysis. Submission also calls for the location of a post primary Gaelscoil on East of the city.</p>	<p>CE Response The contents of the submission are noted. The Council will continue to engage with the Department of Education with regard to the provision of school accommodation in the city. The draft plan includes a specific objective to support the provision of a post primary school in the East of the City.</p>

7.6 - Institutional Lands		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-229 Friends of Merlin Woods	<p>Submission supports policy 7.9.3. requests amendments to Policy 7.9 Institutional Lands as follows</p> <ol style="list-style-type: none"> 1. Facilitate and promote the development of institutional land within the city unless it is of recreational and amenity value to local community and wildlife. 2. Retain institutional lands and only allow consideration for change in use where it is demonstrated that certain institutional lands are surplus to requirements, the Council will consider residential use or uses compatible with that of adjoining zones or specifically require that the lands be retained for alternative institutional uses. Where residential development is permitted a reserve of a minimum of 20% of the total site area for communal open space will be required unless it is of high biodiversity value as amenity land 4. Promote the retention of public access to institutional lands where this has been traditionally enjoyed or where there is a significant amenity associated with the lands or where land is important as a wildlife area or local biodiversity area. 	<p>CE Response</p> <p>The contents of the submission are noted and support for policy 7.9.3. The request to amend Policy 7.9.1 is not recommended as proposed text would conflict with the objectives set out in Institutional and Community CF Land Use Zoning Objectives. The development plan identifies Institutional Open Spaces as important components of the city's green network in Section 5.2 Green network, implicitly recognising their environmental sensitivity. The proposed amendments are not considered appropriate as policy to support, protect and enhance biodiversity and amenity in the plan is addressed in Policy 5.2 Green network and biodiversity.</p>
GLWC-C2-230 Dept. Housing, Local Government and Heritage	<p>Submission from the National Monuments Service recommends with regard to Policy 7.9 Institutional Lands a requirement for the preparation of appropriate Archaeological and Cultural Heritage Impact Assessments (including Underwater Archaeological Impact Assessment) in relation to any development proposals and to seek and have regard to the advice and recommendations of the Department of Housing, Local Government and Heritage relating to such developments.</p>	<p>CE Response</p> <p>The contents of the submission are noted. <i>Policy 8.4.7 Ensure that any development proposal with potential to impact on archaeological heritage includes for an archaeological assessment. This includes within terrestrial, riverine, inter-tidal and sub-tidal environments and Policy 8.4.3 Have regard to the archaeological recommendations of the DHLGH on any planning applications are applicable to development proposals on Institutional Lands and it is not considered necessary to amend Policy 7.9.</i></p>

CE Request	Undertake an analysis study on City Hall during the development plan period with a view to assessing the best options for the future of the site.	CE Recommendation Amend 7.7 Specific Objective to insert text in green for new Specific Objective 7.7.15 Undertake an analysis study on City Hall and its associated site and services during the development plan period with a view to assessing the best sustainable options for the future of the site which can include the option of unlocking the potential of the site for regeneration opportunities.
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Chapter 7: CE Recommendations

1. Amend Preface, Strategic Policy Framework UN Convention on the Rights of Persons with Disabilities (UNCRPD) as guiding document.

UN Convention on the Rights of Persons with Disabilities (UNCRPD) - Irelands ratified the UNCRPD in 2018. The purpose of the Convention is to promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and to promote respect for their inherent dignity.

7.1 Context

2. Amend Policy 7.1.1 General Policies

Support and facilitate the sustainable development of community, social and cultural infrastructure in collaboration with key stakeholders, **including community stakeholders such as the Galway City Community Network**, that affords inclusive opportunities for everyone to shape their own lives, enables communities to realise their full potential and that contributes to a high quality of life and wellbeing for all who live work and visit the city.

7.2 Creative City

3. Amend Policy 7.2 Creative City to add text in green for new policy 7.2.13

In conjunction with the Arts Office and in line with the aims of *Everyone Matters A Cultural Sustainability Strategy Framework For Galway 2016-2025* seek to develop a feasibility model for the provision of artist live-work space during the lifetime of the Development Plan.

4. Amend Policy 7.2 Creative City to add text in green for new policy 7.2.14

Promote a high standard, sustainable quality and innovativeness in architecture and design, recognising Places for People - the National Policy on Architecture and the contribution of architecture to culture and its value as an art form.

7.3 Inclusive City

Amend Section 7.3 Inclusive City, People with disabilities to delete ~~strikethrough~~ text and add text in green

People with disabilities

Galway City Council is committed to working with people with disabilities and their representative groups to facilitate their access to housing, transport, **employment** and the built environment. Ireland's ratification of the UN Convention on the Rights of People with Disabilities (UNCRPD) in 2018 places an obligation on the Irish state to ensure people with disabilities have equal civil and political, social and economic rights across all sectors. Having regard to obligations under the UNCRPD, the Council will work with relevant stakeholders to support the implementation of the UNCRPD at the local level. In addition, the Council is a signatory to the Barcelona Declaration of 1995, which promotes universal access in the public realm, public buildings and services and encourages participation of people with disabilities in the social, economic and cultural life of the city.

Galway City Council ~~would support~~ supports the installation of Changing Places facilities (specialised toilet facilities) in the City and particularly in recreational and amenity spaces. In addition, Galway City Council supports and encourages the provision of these facilities in any new building developments where the public have access in large numbers, such as, educational establishments, cultural buildings, health facilities and sport and leisure facilities. *The Council will continue to support the development of a high quality, inclusive, accessible and affordable housing, transport, employment, built environment and public realm through the implementation of disability legislation, the building regulations, Universal Design Guidelines and the Galway City Public Realm Strategy*

5. Amend Policy 7.3 Inclusive City to add text in green

7.3.2 Proactively promote the various aims of the Council to give effect to the **UNCRPD**,

Barcelona Declaration and support universal design principles to make Galway a more accessible and disability friendly city.

7.3.7 Co-operate with the Access for All Network and other organisations representing people with disabilities to provide equal access for all citizens particularly in the area of housing, transport, **employment**, built environment and the public realm within the city.

7.4 Bilingual City

- 6 Amend Policy 7.4.4 Bilingual City to add text in green

Support the implementation of the Plean Tenga Chathair na Gaillimhe 2020-2026 and the designation of the city as a Gaeltacht Service Town. **Support the implementation of language plans for Bearna & Cnoc na Cathrach LPA, Galway City East LPA and the Eachréidh LPA.**

- 7 Amend Figure 7.3 to show language boundaries of language planning areas as Gaeltacht GIS viewer:

<https://dahg.maps.arcgis.com/apps/webappviewer/index.html?id=7090794ee2ca4b53bb785b84c2bd9ad8>

7.5 Community facilities

- 8 Amend Policy 7.8 Healthcare Facilities to add text in green for policy no.5
Support the delivery of key strategic healthcare infrastructure, including a new Elective Hospital, within the city.

- 9 Amend Section 7.5 Community Facilities under Education heading in the fourth paragraph to delete strikethrough text and add text in green.

The city is also home to ~~33 primary schools and 12 secondary level schools~~, **25 primary schools, 12 post primary schools, 5 special schools and** a number of private colleges and language schools

7.7 Specific Objective

- 10 Amend 7.7 Specific Objective to Insert text in green to new Specific Objective 7.7.15

7.7.15 Undertake an analysis study on City Hall and its associated site and services during the development plan period with a view to assessing the best sustainable options for the future of the site which can include the option of unlocking the potential of the site for regeneration opportunities.

Chapter 8: Built Heritage, Placemaking and Urban Design

8.2 - Record of Protected Structures		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-44 Phyllis Molloy	<p>Deletion of RPS Ref 8702 St. Mary's, Rockbarton, Salthill</p> <p>Submission requests deletion of RPS Ref 8702 St. Mary's, Rockbarton, Salthill from the Record of Protected Structures on the basis that its protection is no longer warranted as per s. 54(a) (ii) of the 2000 Act (as amended). The submission also notes that the National Inventory of Architectural Heritage does not include a record of the structure. Also relevant to Appendix 3.</p>	<p>CE Response</p> <p>The procedure for deletion of a structure from the RPS cannot be part of the development plan process at this stage due to the timescales involved. It must be done under a separate process in accordance with section 55 of the Planning and Development Act 2000 as amended.</p> <p>Notwithstanding this, it is considered that the correct procedure in this case would be to seek a Section 58 Declaration which would set out exactly the extent of works that could be carried out on the structure without impacting on the specific value of the structure. In this regard it is not recommended that this structure is deleted from the RPS.</p> <p>It is considered that the NIAH is not the sole determinant of heritage value in the city. There are many other structures on the RPS which are not included on the NIAH. It has been affirmed by the Heritage Officer that this structure has significant heritage value and merits its designation as a protected structure.</p>
GLWC-C2-143 Martin Concannon	<p>Removal of RPS- Ref 2901 Winacre Lodge, Barnacranny, Moycullen Road, Bushypark</p> <p>Submission requests that RPS Ref 2901 Winacre Lodge, Barnacranny, Moycullen Road, Bushypark is removed from the Record of Protected Structures (RPS). Submission states that its protection is no longer warranted as per s. 54(a) (ii) of the 2000 Act (as amended).</p>	<p>CE Response</p> <p>The procedure for deletion of a structure from the RPS cannot be part of the development plan process at this stage due to the timescales involved. It must be done under a separate process in accordance with section 55 of the Planning and Development Act 2000 as amended.</p> <p>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</p>

		<p>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 chimney stack.</p> <p>A survey carried out by the Council in 2013 of thatched cottages in the city includes images and a survey of the cottage. The cottage has a significant character which warrants its inclusion in the RPS. Its presence along the national route entering the city adds to the architectural heritage of the city and contributes to the area's character.</p> <p>It should be noted that the owner has received specific conservation grants in the past for works to the structure.</p> <p>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.</p>
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8.3 - Architectural Conservation Area

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-170 Nuns' Island Residents' Association	Nun's Island- Should be an ACA Nuns' Island Street has been in existence since late 1600s. Its contours are unchanged from those early maps. The current buildings mainly date from early 1800s and as such the street deserves to be included as an Architectural Conservation Area (ACA). This would protect the streetscape including the granite kerbing and what remains of its built heritage which combines industrial, educational and residential use. Currently zoned as a Zone of Archaeological Potential, the area is not protected as a whole despite having 12 protected structures on the street.	CE Response Currently there are 11 designated ACAs in the city and Policy 8.2 Architectural Conservation Areas, requires the preparation of management plans for these. The designation of an ACA requires a detailed assessment of the character of the area and the specific value and merit which would deem the area worthy of ACA designation. This cannot be carried out within the short timescale associated with this stage of the development plan process.
GLWC-C2-40 Jane Coyne	The narrowness of the street is one of the heritage aspects of Nuns' Island. Any increase in traffic could pose danger to pedestrians. The	

	current level of access and parking is working well for residents and those using the school so we submit that this should not be changed.	
GLWC-C2-150 Angela Casey	Munster Ave 1-6 and 7-12 should be designated as an ACA There are two terraces of houses along the south of Munster Avenue which are former Galway Corporation properties. (Photographs of these terraces are included with submission). The terraces are an example of a vernacular architecture used in the provision of social housing from the 1930s in Ireland. The survival of these mass-concrete constructed terraces, intact and true to their original design, is unique in Galway city and worthy of protection and designation as an architectural conservation area. The front gardens and garden walls remain in their original state as none of the houses redeveloped the front garden to provide off-street parking. The terraces are a townscape of interest for architectural, historical, and social reasons and provide a unified façade on the Avenue. I believe the two terraces in Munster Avenue, numbers 1-6 and 7-12, should be designated as an architectural conservation area to ensure the special intact unified character of the terraces is protected. There are currently 11 such Architectural Conservation Areas in the draft Plan, some of which were marred by extensive redevelopment prior to their designation. The city council should prevent similar destruction of the unique vernacular architectural heritage of Munster Avenue by now designating the terraces as an architectural conservation area in the draft Plan. In section 8.4 on vernacular heritage, only thatched cottages are cited as being worthy of protection. The two 1930 terraces of houses on Munster Avenue, along with the houses in Bowling Green, are further examples of vernacular heritage that should be included in this section of the draft Plan	CE Response Currently there are 11 designated ACAs in the city and Policy 8.2 Architectural Conservation Areas, requires the preparation of management plans for these. The designation of an ACA requires a detailed assessment of the character of the area and the specific value and merit which would deem the area worthy of ACA designation. This cannot be carried out within the short timescale associated with this stage of the development plan process. Section 8.4 Vernacular Heritage, recognises the value of the vernacular heritage and includes thatched cottages as an example. It recognises that there are a variety of structures and features that contribute to the local character of the city. Policy 8.3 Vernacular Heritage states to encourage the conservation and rehabilitation, renovation and reuse of existing structures that contribute to the character of the city. In addition the draft plan currently includes policy to protect the character of these areas.
GLWC-C2-184 Valerie Walsh		

8.5 - Archaeology		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-33 James McCarthy	<p>Roscam Monastic Site</p> <p>Need to develop an environmentally and archaeologically sensitive plan to study and eventually develop the extensive Roscam Monastic Site, including the Round Tower and earlier Bronze Age Settlement Areas into a major East Galway Heritage, Culture, and Science Arts Hub.</p>	<p>CE Response</p> <p>This is outside the scope of the development plan, it comes under the remit of the Department of Housing, Local Government and Heritage, National Monuments Service who have responsibility for sites and monuments. It could also be a consideration as an action to investigate in the upcoming review of the Galway City Heritage Plan.</p>
GLWC-C2-230 Dept. Housing, Local Government and Heritage	<p>Policy 8.4 - Archaeology</p> <p>Recommends that Policy 8.4 no. 5 is amended to include in surveying, recording or excavation of archaeological heritage to include standing historic buildings and underwater archaeological heritage.</p> <p>Requests that underwater archaeology has a greater focus in the plan and recommend an addition to Policy 8.4 to protect, preserve and promote the archaeological value of underwater archaeological sites and objects in rivers, lakes, intertidal and subtidal environments.</p> <p>Advises that policies for the protection of our archaeological heritage should also take account of the setting and amenity of sites and monuments and requests additions to Policy 8.4 Archaeological to reflect this.</p> <p>Recommends inclusion of additions to Policy 8.4 with regard to incorporation of monuments in open spaces, preservation and improvement of access, interpretation of archaeology; public access to excavations and community initiatives and projects.</p>	<p>CE Response</p> <p>In response to the submission from the Dept. Housing, Local Government and Heritage, National Monuments Service, amendments are proposed to the text of Policy 8.4 Archaeology, in particular to reflect underwater archaeology.</p> <p>It is considered that the existing wording in Policy 8.4 Archaeology, addresses the issues with regard to interpretation and accessibility:</p> <p><i>Endorse the sustainable use of archaeological heritage as an educational and cultural resource and promote public awareness of the archaeological heritage of the city.</i></p> <p>CE Recommendation</p> <p>Amend Policy 8.4 Archaeology- insert text in green as follows:</p> <ol style="list-style-type: none"> 1. Protect, preserve and promote the archaeological heritage of the city including underwater archaeology in rivers, lakes, intertidal and subtidal environments. 5. Require the surveying, recording or excavation of archaeological heritage to include standing historic buildings and underwater archaeological heritage during the development process, where appropriate.

		7. Ensure that any development proposal with potential to impact on archaeological heritage, including the setting and amenity of sites and monuments , includes for an archaeological assessment. This includes within terrestrial, riverine, inter-tidal and sub-tidal environments.
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8.7 - Galway City Walls

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-230 Dept. Housing, Local Government and Heritage	<p>Galway City Walls</p> <p>The National Monuments Service welcomes the explicit recognition of the importance of the medieval town defences of the city of Galway and suggests additional wording in section 8.7, that all town defences are considered National Monuments by reason of the historical, architectural and archaeological interest attaching to them</p>	<p>CE Response</p> <p>The following amendment is proposed in Section 8.7 Galway City Walls to reflect the DHLGH submission.</p> <p>CE Recommendation</p> <p>Amend text in section Section 8.7 Galway City Walls in 2nd paragraph - text inserted in green and text removed by strikeout as follows:</p> <p>The National Monuments Acts (1930-2004) legislation gives statutory protection to the city walls. All town defences are considered National Monuments by reason of the historical, architectural and archaeological interest attaching to them. It requires that all works which impact on the fabric of the city defences, or any ground disturbance in proximity to the defences in Local Authority or the Minister's ownership or guardianship, or that have been the subject of a preservation order, are subject to a requirement for Ministerial Consent.</p>

8.8 - Urban Design and Placemaking

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-5 paul rush	<p>Urban Density and Building Height</p> <p>Galway should embrace its linear form and should create a 'Ciudad lineal' from Rahoon to Westside to Moneenageisha to</p>	<p>CE Response</p> <p>This submission is noted. 'Ciudad lineal' is a linear suburb in Madrid. The draft plan supports greater densities to promote compact growth in</p>

	<p>Merlin Park, along the spinal road corridor. Low value, low density development on this route should be replaced with high-density residential, commercial and office developments enabling compact growth and creating a highly accessible development corridor serviced by frequent public transport services operating from a public transport hub at the Galway Shopping Centre. Potential that densities achieved in this area would justify investment in a Gluas or light rail.</p>	<p>particular along public transport corridors. A review of the GTS will include particular along public transport corridors. A review of the GTS will include consideration of the feasibility of a light rail option.</p>
GLWC-C2-38 Transport Infrastructure Ireland	<p>TII- Local Area Plans, Masterplans and Spatial/Design Frameworks</p> <p>TII notes that the mechanism and governance associated with the preparation of masterplans and spatial/design frameworks has not been outlined. It is requested that the approach and governance for masterplans/spatial /design frameworks is addressed in the amended Draft Plan, to address deficiencies in consultation, liaising and evidence- based requirements. References are made to policy provisions on page 212 in Chapter 8 and Section 6 Policy 8.7 Urban Design and Placemaking and Chapter 10, including point 5, Section 10.27 Specific Objectives and 10.17 Doughiska Road Opportunity Site.</p> <p>Draws attention to the DoECLG Local Area Plan Guidelines and DoECLG Sustainable Residential Development in Urban Area Guidelines which advise that such plans (masterplans or similar non-statutory plans) can supplement or complement but not replace statutory plans. If it is intended to use such non-statutory documents for development management, planning authorities should incorporate them in the development plan or local area plan by way of variation, where possible, public consultation should be integrated into the preparation of non-statutory frameworks.</p>	<p>CE Response</p> <p>The inclusion of a requirement in the draft plan to prepare masterplans, frameworks plans or spatial frameworks is to ensure that redevelopment proposals are considered in a holistic and integrated manner at the very earliest stage of planning and urban design.</p> <p>The inclusion of these requirements is over and above the standard development management required documents. It is considered a positive requirement in that it puts an onus on the applicant to consider all aspects of urban design, placemaking and traffic impact in a comprehensive manner. For larger sites, it facilitates how phasing proposals can be accommodated into design. The draft plan approach to development is a plan led approach supported by the strategic Core Strategy, environmental assessments and development management guidelines and standards.</p> <p>It would not be appropriate to include such plans into the draft plan as these support specific development proposals. They are a mechanism to assist in the progression of a planning application and will inform the context of proposed developments.</p> <p>The policy to support Regeneration and Opportunity Sites is set out in the draft plan which is subject to consultation. The detail of any redevelopment proposals will come forward as a planning application which includes for referral to prescribed bodies.</p>

	<p>DoECLG Spatial Planning and National Roads Guidelines require that development should be plan-led and that planning authorities must consult with the TII in preparing local area plans or other non-statutory plans where there may be material implications for national roads</p>	<p>In the preparation of LAPs and other plans by the local authority, it has been the practice to consult with TII where there are implications for national roads at an early stage in advance of any statutory consultation procedure.</p>
GLWC-C2-148 Galway City Community Network	<p>Urban Design and Placemaking</p> <p>The Council will follow the guidance in the RIAI Town and Village Toolkit</p> <p>The Council will clearly illustrate how the principle of Universal Design will be applied in the planning process.</p> <p>The Council will carry out regular audits, in partnership with disability organisations, in the public realm and civic spaces to include both the city centre and suburbs based on the principles of universal design.</p> <p>The Council will identify models of good planning and design internationally and strive to incorporate such practices in the development and implementation of the plan including a shift away from developer led planning and design.</p>	<p>CE Response</p> <p>This submission is noted. While the RIAI Town and Village Toolkit provides guidance in relation to smaller Irish towns and villages, it can transfer to the city context also. There are a range of useful guidance documents available including specific government guidelines which are set out in Appendix 2.</p> <p>Other documents referenced in the plan include Building for Everybody: A Universal Design Approach 2012 which give guidance on how universal design can be applied in the planning process.</p> <p>The Age Friendly Principles and Guidelines for the Planning Authority (Age Friendly Ireland, March 2021), Design Manual for Urban Roads and Streets (DMURS) (2019), NTA Permeability in Existing Urban Areas, Best Practice Guide (2015) and the public realm strategy are also referenced in the draft plan to provide guidance.</p> <p>The Council recognises the value of looking at best practice models both nationally and internationally and will continue to investigate and research and avail of expert consultancy support where applicable.</p>
GLWC-C2-134 Patrick Ryan	<p>Increase Building Heights along Lough Atalia</p> <p>This submission requests the Council to; Amend the "Urban Density and Building Heights Study" to consider increased building heights along Lough Atalia.</p> <p>Lough Atalia Road represents an optimum location for the consideration of increased building heights. In addition, under the provisions of the Galway Transport Strategy (GTS) and</p>	<p>CE Response</p> <p>With regard to the Urban Density and Building Height Study, it used a structured evidenced based methodology to arrive at a selection of sites for suitability for height. This site was not one of the sites selected. This study is a standalone completed document which was prepared to inform the draft plan.</p> <p>Issues raised appear to reflect a recent planning application for an apartment development which was granted by Galway City Council,</p>

	<p>CDP, Lough Atalia Road is designated to accommodate a new cycling and walking “Greenway”</p> <p>Given that Lough Atalia road is located alongside the city centre and high capacity urban public transport hubs, this location can be classified as a “Central and/or Accessible Urban location” where higher density buildings are specifically encouraged under the provisions of the Apartment Guidelines.</p> <p>The consideration of increased building heights at this location, is supported by National policy including the NPF and the Ministerial “Building Heights Guidelines.”</p> <p>A higher building of 7 storeys can be considered. It is requested that the text of “Development Guidance-Heights open for consideration” is accompanied by the following sentence “Increased building heights along Lough Atalia Road will be considered.”</p>	which was considered under the current plan and which is currently on appeal.
GLWC-C2-199 Shauna Spillane	<p>Placemaking</p> <p>Rain playgrounds should be included in the plan. They are being pioneered in Gothenburg Sweden as the country’s rainiest city is attempting to embrace the rain in the area.</p> <p>The masterplan should include provision for painting buildings in Galway’s Inner-City areas in bright and colourful paint. Many people visit places for their vibrancy and aesthetic - Galway can capitalise on this by attracting more tourists’ colourful buildings and street art around the city. Take for example, the colourful buildings in Doolin Co. Clare, The Deck of Cards Cobh, Co. Cork and inner-city areas in Lisbon, Portugal. Similarly, the Gnomes situated all around Wroclaw Poland show how artistic elements can be turned into an attraction for the city.</p>	<p>CE Response</p> <p>The draft plan supports the provision of recreation and amenity facilities. Rain playgrounds can be considered within this context. This suggestion will be referred to the recreation and amenity section and could be a consideration of the Greenspace Strategy.</p> <p>Masterplans are required to be prepared in accordance with best practice and guidance is set out in Chapter 8 which includes design quality, townscape rationale and public realm, amenity and space which can include for the issues raised.</p>

	Would like more focus to be given in the plan towards intangible value certain places bring, rather than what value-built development brings.	
GLWC-C2-199 Shauna Spillane	<p>Emphasis needed for Placemaking in Nun's Island</p> <p>In terms of placemaking, the Latin Quarter has pubs and nightlife, while the "West" branded area around Dominic Street attracts foodies. Nuns Island is situated directly between these key touristic areas, yet has no emphasis put on it for placemaking. I would suggest it should follow along the lines of "Island of Culture", "Biodiverse Oasis" or "Island of Creative Innovation". Where those visiting it would expect to street art, intrigue, greenery, water, and visual amenity.</p>	<p>CE Response</p> <p>Noted</p>

8.9 - Public Realm		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-27 Grainne Faller	<p>Quality of Public Realm</p> <p>Ensure that the placement of bins/portaloo do not detract from the quality of the public realm. Consider the introduction of a beauty clause.</p> <p>Ensure that maintenance works are carried out in a way that does not reduce the quality of the public realm.</p> <p>Shop street resembles a road, surface should be upgraded</p> <p>Submission questions the replacement of benches that did not require replacing</p> <p>Remove cars from public spaces including City Centre and Woodquay</p> <p>Provide spaces for people to sit and be.</p>	<p>CE Response</p> <p>Noted, these are issues which are addressed in service delivery plans of the Environment Section and Transport Section.</p> <p>The Public Realm Strategy and GTS supports the extension of city centre pedestrianisation and including rejuvenation of public spaces and removal of on-street car parking.</p> <p>URDF funding has been awarded for development of a new urban space at Woodquay with the removal of car parking.</p>
GLWC-C2-37 Galway Age Friendly Alliance	<p>Outdoor spaces and public buildings - Age Friendly</p> <p>Mainstream Walkability Audits as part of all public realm works to identify issues in accessibility, mobility and connectivity, and address deficits in relevant areas such as footpaths, pedestrian crossing points and traffic calming, parking, age-friendly parking spaces, public toilets and public seating, as part of those funding applications.</p> <p>In addition, a commitment to deliver Public Realm Training workshops to create awareness of the recommendations included in national policy guidelines "Being Age-Friendly in the Public Realm"</p>	<p>CE Response</p> <p>A specific objective set out in Section 8.10 is to carry out an audit of existing roads and public realm spaces in Galway in order to itemise in priority order the specific locations which need to be modified to improve accessibility.</p> <p>The draft plan refers to the Age Friendly Technical Advisor within the Council whose role is to advise both the Council and developers on age friendly and universal design principles in the design and construction process and a range of guidance is available to inform best practice. It is acknowledged that such advice could be through workshops.</p>
GLWC-C2-82 Aran Murray	Outdoor Spaces	<p>CE Response</p> <p>Noted. The draft plan supports enhancement of the character and visual attractiveness of the city. The implementation of the Public</p>

	Create more appealing outdoor spaces with attractive outdoor furniture to reflect the attractive character of the city.	Realm Strategy supports attractive outdoor spaces and the appropriate design of street furniture to reflect the character of the city.
GLWC-C2-127 Roselyn Carroll	Woodquay Plaza Continue RA Greenway from the Plots alongside Woodquay park and across the Headford Road, and around East and West sides of Wood Quay as part of the redevelopment Woodquay public space/Plaza.	CE Response The provision of additional RA greenways will be a consideration of the Greenspace strategy. As part of the design of public space at Woodquay, consideration will be given to connectivity to the proposed RA greenway along the river and connecting to the pedestrian bridge crossing on the old railway line,
GLWC-C2-97 Architecture at the Edge	Young People- Design Considerations We want every inch of the city to be used and not left derelict - Even if unused spaces can't be redeveloped immediately, let young people help find new uses for them; when left derelict they are dangerous and make parts of the city look and feel abandoned. Young people need sheltered places to sit and to meet people that are better designed and well looked after-Quality design and materials that are well looked after tell our young people communities that we are worth investing in. We need broader pavements and car-free streets- Pedestrian areas need to be planned and designed to be safer for everyone. We want lively streets with better and more creative lighting- Busy, well-lit areas will help us and everyone else feel safe on our streets. We want play and performance areas for young people that are at the heart of shopping centres, main streets and parks- Design places where we can meet each other and be seen doing something worthwhile while feeling safe. We want playful signs, bright colour schemes and changing public art- Give our local areas a stronger identity and make them places that we are proud of.	CE Response This submission is noted. The draft development plan supports the views expressed and the policy framework in the plan reflects many of the issues raised supporting the provision of a broad range of facilities, enhanced public realm and amenity space, good urban design and vibrant safe attractive streets. The implementation of the Public Realm Strategy and preparation and implementation of the Greenspace strategy will also address these issues. The implementation of the GTS is also of importance in reducing car use in the city and enhancing the walkability of the city.

<p>We want trees, pools and fountains everywhere – Greenery and water features have a calming effect and make places feel more welcoming.</p> <p>We want everyone to be able to move around Galway– Provide ramps and lifts in all public spaces so everyone can be part of the capital.</p>	
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Chapter 8 Built Heritage, Placemaking and Urban Design: CE Recommendations

1. Amend Policy 8.4 Archaeology- insert text in green as follows:
 1. Protect, **preserve** and promote the archaeological heritage of the city including **underwater archaeology in rivers, lakes, intertidal and subtidal environments**.
 5. Require the surveying, recording or excavation of archaeological heritage **to include standing historic buildings and underwater archaeological heritage** during the development process, where appropriate.
 7. Ensure that any development proposal with potential to impact on archaeological heritage, **including the the setting and amenity of sites and monuments**, includes for an archaeological assessment. This includes within terrestrial, riverine, inter-tidal and sub-tidal environments.
2. Amend text in section Section 8.7 Galway City Walls in 2nd paragraph - text inserted in green and text removed by ~~strikeout~~ as follows:

The National Monuments Acts (1930-2004) legislation gives statutory protection to the city walls. All town defences are considered National Monuments by reason of the historical, architectural and archaeological interest attaching to them. It requires that all works which impact on the fabric of the city defences, or any ground disturbance in proximity to the defences in Local Authority or the Minister's ownership or guardianship, or that have been the subject of a preservation order, are subject to a requirement for Ministerial Consent.

Chapter 9: Environment and Infrastructure

9.2 - Flood Risk Assessment		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-42 OPW	<p>Submission from the OPW welcomes commitments in Policy 9.1 Flood Risk to: 1) Support the implementation of the Guidelines, the EU Flood Risk Directive, the Flood Risk Regulations 2) Ensure the recommendations of the SFRA are taken into consideration in the assessment of development in flood risk areas 3) Ensure flood risk is incorporated into the preparation of any future LAPs, Framework Plans and Masterplans in the city.</p> <p>The following opportunities are highlighted for the draft plan before it is finalised:</p> <ol style="list-style-type: none"> 1. Flood Zone Mapping - It is noted that the only flood zone mapping that has been included for the consultation is a single low resolution Flood Zone Map that covers the entire plan area and the clipped flood map extents for each Justification Test. As this mapping is low resolution, it is difficult to assess the zonings/sites at flood risk or if the sequential approach has been applied. 2. Point 3 of policy 9.1 sets out that SSFRAs are required "where appropriate". This wording might be amended to reflect the wording in section 11.27 that SSFRAs are required in all areas of identified flood risk. 3. Flood Relief Schemes - OPW welcomes the support for the Coirib go Cósta Flood Relief Scheme in policies 2.2 and 9.1. It would be beneficial if policy wording were clarified to ensure zoning or development proposals support and do not impede or prevent the progression of 	<p>CE Response</p> <p>Support from the OPW is noted and welcomed.</p> <p>Issues raised relating to Flood Zone Mapping are noted. This issues was also raised by the OPR and the recommendation (see CE response to OPR Recommendation 12) is that following adoption of the plan that an interactive web based Land Use Zoning and Specific Objectives Map be created to include a range of layers including the flood zone A and B mapping layer and be made available in conjunction with the City Plan and Environmental Assessment and supporting documents for the duration of the plan period. This would provide the most optimum level of clarity with regard to identification of areas at flood risk in the city.</p> <p>With regard to consistency with section 11.27 of the draft Plan it is considered appropriate to amend Policy 9.1 Flood Risk to require SSFRAs for all areas identified as at flood risk. A further amendment is also recommended with regard to the flood management guidelines and sites which are partially at flood risk.</p> <p>In relation to the Coirib go Cósta Galway City Flood Relief Scheme, it is noted that all relevant development management proposals are currently being referred to the Project Manager of the scheme to assess and to ensure that they do not prejudice the scheme.</p> <p>This is considered a sufficient methodology to protect against any development that could prejudice measures that may ultimately emerge. It is considered premature at this current stage of the flood relief scheme to include the wording as proposed as the project is at an early stage and options have not been advanced. It is recommended that Policy 9.1 Floor Risk be amended to ensure consistency with Section 11.27.</p>

	<p>these measures, and to reflect the commitment in section 11.27 of the written statement that “Proposed developments shall have regard to the the Coirib go Cόsta Galway City Flood Relief Scheme”.</p>	<p>CE Recommendation</p> <p>Amend Policy 9.1 Flood Risk No.3 – insert text in green and delete text with strikethrough as follows:</p> <p>4. Ensure the recommendations of the Strategic Flood Risk Assessment (SFRA) for the Galway City Development Plan 2023-2029 are taken into consideration in the assessment of developments in identified areas of flood risk. And Require site specific Flood Risk Assessment (FRA) and associated design and construction measures appropriate to the scale and nature of the development and the risks arising, in all areas of identified flood risk where appropriate including on sites where a only small proportion of the site is at risk of flooding and adopt a sequential approach in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009).</p>
GLWC-C2-42 OPW	<p>Submission from the OPW welcomes the commitment in policy 9.1 to protect the coastal area and foreshore and avoid inappropriate development in areas at risk of coastal erosion.</p> <p>It should be noted that the Government has established an Inter-Departmental Group on Coastal Change Management to scope out an approach for the development of a national coordinated and integrated strategy to manage the projected impact of coastal change to our coastal communities, economies, heritage, culture and environment. The Inter-Departmental Group is jointly chaired by the Department of Housing, Planning and Local Government and the OPW and will bring forward options and recommendations for the Government to consider as soon as possible.</p>	<p>CE Response</p> <p>Support from the OPW for Policy 9.1 regarding coastal protection is noted and welcomed.</p>
GLWC-C2- 230 Dept. Housing, Local	<p>Submission from the National Monuments Service recommends that Policy 9.1 Flood Risk includes reference to archaeology and the guidelines for the archaeological assessment of Flood Relief Schemes (DHLGH and OPW 2021).</p>	<p>CE Response</p> <p>It is not considered appropriate to single out this specific guidance document over a range of other relevant guidance documents to include in policy 9.1. As part of any flood relief scheme, environmental assessments will be required</p>

Government and Heritage		which will include for archaeological assessment which will be carried out in accordance with the relevant guidelines.
GLWC-C2-230 Dept. Housing, Local Government and Heritage	Submission from DHLGH recommends inclusion in Policy 9.1 Flood Risk No. 6 and policy 9.10 Energy and Associated Infrastructure No 3 and in relation to the objective in section 4.8 to develop the national greenway network, to ensure compatibility with nature conservation and biodiversity protection and where potential issues have been addressed in Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Ecological Impact Assessment (ECiA) as appropriate.	<p>CE Response</p> <p>This is noted and is addressed in the Core Strategy of the plan which includes specific policy in Policy 1.4 Core Strategy to support the implementation of the SEA Directive, the Habitats Directive, Birds Directive, EIA Directive and Water Framework Directive and appropriate supporting legislation and guidelines.</p> <p>Policy 5.2 Protected Spaces: Sites of European, National and Local Ecological Importance is the guiding policy for all plans and projects setting out the requirements to undertake appropriate assessment.</p> <p>Section 11.34 also states that <i>Ecological Impact Assessment (EIA) will be required to be undertaken for developments proposed in areas that support, or have the potential to support, protected species or features of biodiversity importance, and that appropriate avoidance and mitigation measures are incorporated into all development proposals...</i></p>
GLWC-C2-27 Grainne Faller	Submission makes reference to the visual impact of the inflatable flood barrier and requested that if should not be inflated when not required and alternative flood prevention mechanisms such as trees and vegetation should be considered.	<p>CE Response</p> <p>The points raised regarding the visual impact of the inflatable flood barrier are noted. The inflatable flood barrier is a temporary measure and will be replaced by a permanent flood defence solution as part of the Coirib go Cósta Galway City Flood Relief Scheme. The design of scheme will be required to have regard to the built and natural environmental sensitivities of the area.</p>

9.3 - Water Quality

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-27 Grainne Faller	Submissions request that regular water quality monitoring be carried out throughout the city, at as many locations as practical, all year round.	Section 9.3 of the development plan recognises the need to protect the city's water resources from sources of pollution and ensure water quality is maintained at a good level. Policy 9.2 Water Quality includes support for measures aimed at managing and protecting water quality in the city including implementation of the River Basin Management Plan, support for monitoring and maintenance of good bathing water quality in the city, protection of groundwater, minimise and control discharges to prevent pollution and ensure development adheres to environmental standards and guidelines.
GLWC-C2-209 Lenny Antonelli		
GLWC-C2-106 Michelle Carey		
GLWC-C2-189 Galway National Park City initiative		The control and management of water quality is outside the remit of the development plan.
GLWC-C2-187 Brendan Smith		

9.4 - Water Services		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-102 Irish Water	<p>The inclusion of population projections in the Core Strategy table would assist Irish Water. The potential development yield of 11,111 units over the plan period with a 2.58 occupancy rate would equate to c 29,000 population which appears high.</p> <p>Mutton Island Wastewater Treatment Plant (WWTP) is currently compliant with the emission limit values set in its wastewater discharge license and it is anticipated the WWTP has capacity to accommodate the 2028 target population of 106,664.</p> <p>The Greater Galway Area Strategic Drainage Study which has commenced will investigate options to provide for the targeted growth in the Galway metropolitan area in the medium and long-term.</p> <p>A range of plans including a drainage area plan and a network development plan for the city are being developed and implemented by Irish Water to ensure provision of adequate water and waste water supplies. This includes water infiltration reduction, conservation measures; leakage reduction, mains rehabilitation and network efficiency; sustainable supplies and Drinking Water Source protection.</p> <p>Irish Water envisage that there is adequate water supply available to cater for the 2028 target population of 106,664 and that the new River Corrib water intake will improve security of supply.</p> <p>Network upgrades may be required to service some zoned sites. Some strategic network upgrades may also be required to cater for the full extent of development proposed and these will be informed by the ongoing DAP and upcoming strategic water network assessment.</p> <p>In order to maximise the capacity of existing water services, phased sequential development in areas with existing water services infrastructure and spare capacity is encouraged. To maximise the capacity of wastewater networks, the</p>	<p>CE Response</p> <p>The points raised in this submission area noted. With regard to the Core Strategy, amendments are proposed to the strategy including a revisions to show more specific targets and these are allied specifically to neighbourhood areas (see CE response to OPR Recommendation 1-4).</p> <p>Points raised with regard to Mutton Island Wastewater Treatment Plant (WWTP), the new River Corrib water intake, the Greater Galway Area Strategic Drainage Study, the Drainage Area Plan and Network Development Plan and the water network assessment are noted and welcome ensuring that there is adequate provision of services in the city into the future.</p> <p>In relation to discharge of surface water, it is noted that the draft plan includes in Section 11.22 Water Quality states that <i>all new developments will be required to provide a separate foul and surface water drainage system and to incorporate sustainable urban drainage systems where appropriate in new development and the public realm</i>. It also states that <i>the discharge of additional surface water to combined (foul and surface water) sewers is prohibited in order to maximise the capacity of existing collection systems for foul water</i>.</p> <p>The draft plan supports the use of nature based SUDs and additional text is proposed in Chapter 9 and Chapter 11 to incorporate the <i>Nature Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document</i>' (DHLG) (November 2021) (see CE response to OPR submission Recommendation 12).</p>

<p>discharge of additional surface water to combined (foul and surface water) sewers is not permitted and stormwater separation from combined sewers and the implementation of Nature-based Suds is strongly encouraged to remove surface water from combined sewers, thereby freeing up additional capacity for development.</p> <p>The removal of surface water from the combined sewer network will be necessary to free up capacity for development. Irish Water would welcome the inclusion of an objective supporting opportunities for surface water removal in all developments, including public realm and road projects. Irish Water state that there are potential opportunities to collaborate on projects that would remove stormwater from combined sewers.</p> <p>Irish Water suggest minor text additions to reflect updates to the national water resource plan; text to protect drinking water sources and to have regard to water intake locations in provision of recreation infrastructure along the river.</p> <p>Irish Water advise in relation to Section 8.10 specific objectives that any re-development of the waterworks building in Terryland must ensure IW assets are protected and accessible at all times and Irish Water should be consulted.</p> <p>Irish Water welcome in chapter 11 the inclusion of a requirement to consult with Irish Water regarding infrastructural requirements for residential development (p293) and recommend that this be expanded to apply to commercial and industrial development.</p> <p>Capacity for further development in the Merlin Park WWPS No.1 catchment is extremely limited until the ongoing project to provide additional storage at the WWPS is completed. This will impact the Ardaun LAP.</p> <p>As part of the master-planning process on Regeneration and Opportunity sites, consideration should be given to how these sites will be serviced as well as to potential impacts on Irish Water infrastructure and projects.</p> <p>Irish Water state that whilst protection of the riparian zone is welcome (policy 5.3.17) access and maintenance to Irish Water infrastructure and provision of new infrastructure may be required and the plan should allow for this.</p>	<p>The ambition to remove surface water from the combined sewer network to free up capacity for development is noted. In discussion with the water services section on this issue, they would welcome opportunities to collaborate on projects that would remove stormwater from combined sewers.</p> <p>The draft plan refers to the National Water Resource plan (NWRP) which is currently being prepared by Irish Water which will seek to achieve a sustainable, secure and reliable public water supply over the next 25 years. As part of the plan, a regional water resources plan will be developed with a focus on water conservation measures, leak reduction, network efficiency and sustainable water supplies.</p> <p>With regard to recreation infrastructure projects along the river, these will require planning applications which will be referred to Irish Water for comment being a prescribed body.</p> <p>With regard to any re-development of the waterworks building in Terryland, this would be a matter for agreement by Corporate services and is outside the scope of the plan.</p> <p>In relation to the inclusion of a requirement to consult with Irish Water regarding infrastructural requirements for commercial and industrial development similar to that for residential development set out in Section 11.3, it is considered appropriate to include a similar requirement in section 11.9 commercial and industry.</p> <p>The comment with regard to Ardaun is noted and is reflected in the Core Strategy amendments which includes for revised housing targets for Ardaun LAP phase 1 (see CE response to OPR Recommendation 1-4). With regard to the Regeneration and Opportunity sites, part of the development of any plans for these sites will be required to include details of servicing arrangements.</p> <p>With regard to the riparian zones, the plan includes to protect and maintain, where feasible, undeveloped riparian zones and</p>
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<p>Irish Water state that marine or renewable energy development should not significantly adversely affect existing, authorised, proposed or reasonably foreseeable Irish Water activity.</p> <p>Irish Water state that a more appropriate zoning for both Mutton Island and the new water supply intake south of Quincentenary Bridge would be CF (similar to current Terryland WTP) as opposed to the current RA zoning.</p> <p>Irish Water advise in relation to residential zoned land (Fig 11.8) immediately adjacent to Terryland WTP, that any future development should take account of the established use of the existing WTP and the potential for future development of the plant.</p> <p>Irish Water advise that development of private wells and private waste water treatment plants should not generally be considered and that development in non-serviced lands shall have particular regard for, and not adversely impact on, drinking water sources (policy 5.10.4).</p> <p>Irish Water would welcome consultation in the preparation of a river conservation management plan.</p> <p>Irish Water advise that significant water and wastewater works would be required to cater for the future Airport site development.</p> <p>Irish Water welcome that the Draft plan includes objectives/policies from the “<i>Menu of Objectives/Policies for Water Services in Development Plans</i>” and suggests additional objectives to be included such as:</p> <p><i>“To support Irish Water in the development and implementation of Drinking Water Safety Plans which seek to protect human health by identifying, assessing and managing risks to water quality and quantity; taking a holistic approach from source to tap.”</i></p> <p><i>“To support Irish Water in the promotion of effective management of trade discharges to sewers in order to maximise the capacity of existing sewer networks and minimise detrimental impacts on sewage treatment works.”</i></p>	<p>natural floodplains along the River Corrib and its tributaries. While ultimately these areas should be protected and maintained the inclusion of “where feasible” allows for situations where this may not be possible, including where access and maintenance of Irish Water infrastructure may be required.</p> <p>Comments with regard to marine or renewable energy development, potential development of lands adjacent to Terryland WTP and the Airport site are noted.</p> <p>It is considered that the current RA zoning at the two locations - Mutton Island and site of the new water supply intake south of Quincentenary Bridge is an acceptable zoning. This zoning has not hampered development as RA zoning allows for public utilities.</p> <p>The preparation of a river conservation management plan would include for consultation with a range of stakeholders including Irish Water.</p> <p>With regard to private wells and private waste water treatment plants, the development management assessment will determine suitability in this regard. Planning applications are referred to Irish Water as a prescribed body for observation and are taken into consideration in any recommendation for decisions.</p> <p>With regard to proposed additional policies, it is considered that the refusal of residential development that requires the provision of private waste water treatment facilities is not an appropriate policy and is a consideration as part of the development management process.</p> <p>CE Recommendation</p> <p>Amend Section 11.9 Commercial and Industry 11.9.1 General – insert text in green as follows:</p>
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	<p><i>"To refuse residential development that requires the provision of private waste water treatment facilities (i.e. Developer Provided Infrastructure), other than single house systems."</i></p>	<p>Infrastructural requirements with respect to water will require evidence to be provided by the developer of consultation with Irish Water prior to applying for planning permission to ensure that adequate water services will be available to service the development and that existing water services will not be negatively impacted.</p> <p>Amend Policy 9.3 Water Services – insert additional policy points in green as follows:</p> <p class="list-item-l1">8. Support the development and implementation of Drinking Water Safety Plans by Irish Water, which seek to protect human health by identifying, assessing and managing risks to water quality and quantity; taking a holistic approach from source to tap.</p> <p class="list-item-l1">9. Support the promotion of effective management of trade discharges to sewers by Irish Water in order to maximise the capacity of existing sewer networks and minimise detrimental impacts on sewage treatment works.</p>
GLWC-C2- 190 An Taisce - Galway Planning Committee	<p>Mutton Island Waste Water Treatment Plan- New Policy Objective Proposed</p> <p>Submission notes the importance of a high-quality, clean, drinking water supply and good bathing water quality is important for the future economic, physical growth and public health of the city, the diverse range of natural water assets in the city and the need to protect water quality and protect against pollution.</p> <p>Submission refers to capacity of the Mutton Island Waste Water Treatment Plant outlined in the Draft Plan and states that this capacity is a theoretical capacity and assumes that all rainfall flows into storm water pipes, which then flow into the sea at various Storm water outfalls.</p> <p>Galway City also has a known problem whereby storm water pipes are connected to waste water pipes. This produces an extra processing load on the Mutton Island Waste Water Treatment Plant.</p>	<p>CE Response</p> <p>The contents of this submission are noted. It is noted that many of these issues are the responsibility of Irish Water and outside of the realm of the local authority. It is noted that many of the speculations stated relate to areas which are outside the development plan/ local authority remit.</p> <p>Chapter 9 sets out the policy framework to support the provision of adequate services and capacities to meet the needs of the city within the period of this plan 2023-209. The text in Chapter 9 and the policy framework read in conjunction with the Irish Water submission sets out the current status in relation to mutton island.</p>

	<p>When there is insufficient treatment capacity at this plant, waste water overflows into storm water pipes which end up in the Claddagh Basin at the Storm Water Outfalls. Not to allow this to happen would result in untreated waste water overflowing into the streets in the city.</p> <p>Four examples in 2021 when foul water/ water overflowed into the Claddagh Basin is evidence of insufficient capacity.</p> <p>Incidents when the Storm Water Outfall at the Claddagh (located opposite Claddagh Church) included untreated waste water have been recorded on social media. Mutton Island Waste Water Treatment Plant does not have the capacity to receive the volume of untreated waste water that has been directed to it.</p> <p>New specific objectives should be added to Section 9.2 as follows:</p> <p>Install sufficiently sized storage tanks for untreated waste when required to eliminate incidence of untreated waste water being discharged into the Claddagh Basin outside of the unusual Rainfall Level permitted by the EPA for the Mutton Island Waste Water Treatment Plant.</p> <p>Actively support Galway County Council's earliest possible construction of Galway East WWTP to process waste water generated east of the River Corrib. "This in addition to the changes below should be made to this section</p> <p>Carry out an engineering survey between June and September 2022 of storm water pipework in the vicinity of Ballyloughane Beach and Grattan Beach, to determine the extent if any that water quality results at these beaches is linked to misconnections between waste water pipework and storm water pipework.</p> <p>Have water quality samples taken and analysed for E-Coli and Intestinal Enterococci every two weeks from January to December at Silverstrand, Salthill, Grattan Road and Ballyloughane beaches."</p>	<p>Irish Water confirm that the Mutton Island Wastewater Treatment Plant (WWTP) has capacity to accommodate the NPF target population to 2028.</p> <p>The Greater Galway Area Strategic Drainage Study which is scheduled to be completed by 2023 will investigate options to provide for the targeted RSES growth in the Galway metropolitan area in the medium and long-term. This will consider all options for waste water treatment which could include for a new WWTP in the metropolitan area.</p> <p>The policy framework in the plan supports measures to protect water quality. With regard to storm water outfalls and specific water quality issues and requirements for surveys, these are matters to be considered at an operational level and this submission has been referred to the Environmental Section for their consideration.</p>
GLWC-C2-227 Brendan Mulligan	<p>Submissions states that Galway City Council should not permit any development where the wastewater collection network is inadequate to convey wastewater arising from the proposed development to the Mutton Island Wastewater Treatment Plant for treatment without activating Storm Water Overflows during rainfall events where the intensity and quantity of rainfall is less than that</p>	<p>CE Response</p> <p>These comments are noted. As part of the development management process applications are referred to Irish Water</p>

	<p>provided for in ‘Unusual Weather Conditions’ in Technical Amendment C to the licence.</p>	<p>and to the Environment Section for their comments. These are taken into account in the planning application assessment.</p>
GLWC-C2-148 Galway City Community Network	<p>Submission requests that under Policy 9.3.5 Galway City Council agree a specific timeline with Irish Water for the “provision of a sustainable and effective wastewater drainage collection and treatment system capable of meeting the existing and future needs of domestic, commercial and industrial users in the city and the MASP area” and include that specific timeline in Item 5.</p>	<p>CE Response</p> <p>This comment is noted. Irish Water in their plans and programmes set out timelines for implementation of specific projects.</p> <p>It is not considered appropriate nor feasible to include a timeline in Policy 9.3.5 which relates to ongoing provision and improvement to the wastewater drainage collection and treatment system, which are under the control of Irish Water and outside the remit of the local authority.</p>
GLWC-C2-227 Brendan Mulligan	<p>Due to inadequacies in the wastewater collection network, there are frequent discharges to watercourses from Storm Water Overflows during relatively light rainfall events.</p> <p>Recommendation:</p> <ol style="list-style-type: none"> 1. Galway City Council should work in close liaison with Irish Water to upgrade the wastewater collection network to ensure compliance with Waste Water Discharge Licence D0050-01, and in particular to ensure that all Storm Water Overflows are compliant with the criteria in the DoEHLG ‘Procedures and Criteria in Relation to Storm Water Overflows’ and thus eliminate all discharges from Storm Water Overflows during rainfall events where the intensity and quantity of rainfall is less than that provided for in ‘Unusual Weather Conditions’ in Technical Amendment C to the licence. 2. Galway City Council should work in close liaison with Irish Water to provide an adequate wastewater collection network and wastewater treatment facilities to cater for future development on the east side of the city in Oranmore, future development of the Ardaun LAP area, and future development within the MASP on the east side of the River Corrib. 	<p>CE Response</p> <p>These comments are noted. In relation to no. 1 These are considered to be detailed operation matters for Irish Water. They are outside of the scope of the development plan.</p> <p>In relation to no. 2 it is considered that the Greater Galway Area Strategic Drainage Study which is scheduled to be completed by 2023 will investigate options to provide for the targeted RSES growth in the Galway metropolitan area in the medium and long-term.</p>

GLWC-C2-80 Conor Dowd GLWC-C2-127 Roselyn Carroll	<p>Submission specifies need for the immediate expansion of Mutton Island WWTP or the building of a new WWTP due to link between high rainfall and raw sewerage flowing into the river Corrib and Galway Bay identified in An Tasice report [Link - https://www.antaisce.org/news/wastewater-treatment-in-galway-city]. Extra WWTP capacity required to meet projected population growth.</p>	<p>CE Response</p> <p>Irish Water confirm that the Mutton Island Wastewater Treatment Plant (WWTP) is has capacity to accommodate the NPF target population to 2028.</p> <p>The Greater Galway Area Strategic Drainage Study which is scheduled to be completed by 2023 will investigate options to provide for the targeted RSES growth in the Galway metropolitan area in the medium and long-term. This will consider all options for future waste water treatment in the city and metropolitan area.</p>
GLWC-C2-118 Ibec	<p>Adequate water services infrastructure is essential for the city to thrive. The Development Plan must support investment in water infrastructure through regional projects to meet growing demands from both industry and the increasing population. Along with investment in water infrastructure it is necessary that the region undergo efforts to conserve mains water. Investment in water conservation should be prioritised to reduce demand on current supply. Promotion of water reuse and recycling initiatives should be supported. This will be necessary to secure an additional water source in the medium term.</p>	<p>CE Response</p> <p>These comments are noted and are reflected in draft plan policy set out in Chapter 9.</p>
GLWC-C2-152 Gabriel McGoldrick	<p>Submission details variety of points regarding waste water treatment capacity in the city questioning the PE loading.</p> <p>There is no clear distinction over what allocation is available to the City and what is available exclusively to the County, thereby facilitating double-dipping from the same pot in both plans.</p> <p>The National Planning Framework requires an analysis of infrastructure deficits. It is clear that neither the City nor the County development plans adhere to this requirement in respect of wastewater.</p>	<p>CE Response</p> <p>The draft plan refers in section 9.4 to Irish Water's wastewater wastewater treatment capacity register for Galway City. It outlines the capacity available at Mutton Island Wastewater Treatment Plant (WWTP). It has a current design load of 170,000 PE (population equivalent). The current load reported in the Annual Environmental Report to the EPA for Galway was circa 103,000 PE for 2020. In this regard it is anticipated that the WWTP has capacity to accommodate the projected growth over the plan period 2023-2029.</p> <p>Irish Water confirm that the Mutton Island Wastewater Treatment Plant (WWTP) is has capacity to accommodate the NPF target population to 2028.</p>

GLWC-C2-162 HSE	IW pumping station - MPUH The HSE comment that any new Irish Water pumping station on their grounds at MPUH will only be acceptable to the HSE if sufficient capacity which caters for the needs of the HSE and the future development of MPUH is allowed for within this pumping station also.	CE Response This submission is noted.
GLWC-C2-27 Grainne Faller	Submission request the installation of drink water taps to refill water bottles.	CE Response This submission is noted. The installation of water refill taps is currently part of the work programme of the Council's Water Services operational work programme.

9.5 - Sustainable Urban Drainage Systems (SuDS)

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-42 OPW	SuDS and Natural Water Retention Measures Submission from the OPW welcomes the inclusion of commitment to promote the use of SuDS throughout the Draft Plan including Policy 8.8; Policy 2.2, and Policy 9.4. Submission also welcomes commitments in policy 9.1 Flood Risk to: Protect and promote sustainable management and uses of waterbodies and watercourses from inappropriate development including undeveloped riparian strips, wetlands and natural floodplains; to protect and maintain 'where feasible' undeveloped riparian zones and natural floodplains along the river Corrib and its tributaries; requirement in section 11.19 for new development to consider the use of features such as green roofs, walls and roof gardens and requirement in section 11.30 requiring Climate Scheme Sustainability.	CE Response Comments are noted and welcomed.

9.7 - Air Quality		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-27 Grainne Faller	Submissions call for regular air quality monitoring to be carried out year round, at as many locations as possible throughout the city and at 3 additional locations throughout the city. Request that a policy to monitor and improve air quality should be developed as part of the Development Plan. Submission also notes that the number of air quality monitors in Galway is far below the norm across the country.	<p>CE Response</p> <p>Air Quality monitoring is carried out by the EPA. There are air quality monitoring sensors on the Rahoon Road, Eyre Square and one to be commissioned in Briarhill. Air Quality in the city is within the CAFE directive limits.</p> <p>Policy 9.6 Air Quality and Noise makes a commitment to protect air quality and reduce air pollution through the promotion of sustainable transport modes and the ongoing development of green infrastructure.</p>
GLWC-C2-209 Lenny Antonelli		
GLWC-C2-187 Brendan Smith		
GLWC-C2-127 Roselyn Carroll		
GLWC-C2-189 Galway National Park City initiative		
GLWC-C2-187 Brendan Smith		
GLWC-C2-148 Galway City Community Network		
GLWC-C2-106 Michelle Carey		
GLWC-C2-182 Reform, Central Policy and Communications Division - Dept. of Transport	Submission from the Department of Transport suggests further consideration be given to the role of demand management measures in achieving reductions in noise pollution, air pollution, CO2 emissions, and improving health through active travel and safe street.	<p>CE Response</p> <p>Comments are noted. Policy 9.6 Air Quality and Noise makes a commitment to protect air quality and reduce air pollution through the promotion of sustainable transport modes. The draft plan supports the implementation of the GTS which outlines demand management measures aimed at modal shift and reduction of car journeys. Section 4.5 refers to the reduction in greenhouse gas emissions (GHGs) as a benefit of implementing transport demand measures.</p>

9.8 - Noise		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-148 Galway City Community Network	Submission requests that the Council will develop a new Noise Action Plan which also records noise from industry and that the Council will implement measures to reduce water, air and noise pollution levels	CE Response Comments are noted. Through the planning system the Council will aim to minimise the adverse impact of noise by ensure noise intensive development are located away from sensitive areas, requirement for noise mitigation measure and the use of conditions to limit control the level of noise generated. The development of a Noise Action Plan is outside the scope of the development plan.
GLWC-C2-150 Angela Casey	Submission requests that residential areas (Munster Avenue) are protected from noise generation. The City Council must have regard to the provisions of this section and protect residential areas from excessive noise arising as a consequence of Public Realm or Purple Flag developments, such as the proposed road closures which will divert city centre traffic into Munster Avenue for a period in excess of 6 months to facilitate outdoor drinking. Specific provision should be made in the Development Plan to prevent this type of development in city centre residential areas.	CE Response Comments are noted. Through the planning system the Council will aim to minimise the adverse impact of noise by ensure noise intensive development are located away from sensitive areas, requirement for noise mitigation measure and the use of conditions to limit control the level of noise generated. Concerns relating to excessive noise are noted, however road closures are outside the remit of the development plan.
GLWC-C2-127 Roselyn Carroll	Submission requests that public parks should be included in the list of quiet areas.	CE Response Comments are noted. Section 9.8 Noise acknowledges the importance of quiet areas in the city and includes a commitment that the council will consider initiatives to provide quiet areas in the city including in public parks.

9.9 - Light Pollution		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-230 Dept. Housing, Local Government and Heritage	The DHLGH recommends reference and adherence to EUROBATS (EUROBATS Series No. 8 publication, Guidelines for consideration of bats in lighting projects, 2018) and Dark Sky lighting recommendations (Dark Sky Ireland Lighting Recommendations, 2019) which provide further information on reducing the impact of lighting on wildlife.	<p>CE Response</p> <p>Comments regarding reference and adherence to EUROBATS (EUROBATS Series No. 8 publication, Guidelines for consideration of bats in lighting projects, 2018) and Dark Sky lighting recommendations (Dark Sky Ireland Lighting Recommendations, 2019) which provide further information on reducing the impact of lighting on wildlife are noted.</p> <p>CE Recommendation</p> <p>Amend text in Section 9.9 Light Pollution, second paragraph – insert text in green as follows:</p> <p>In assessment of development proposals the Council will have regard to the Guidance Note GN01/21 The Reduction of Obtrusive Light – Institute of Light Professionals (2021); EUROBATS Series No. 8 publication, Guidelines for consideration of bats in lighting projects (2018) and Dark Sky Ireland Lighting Recommendations (2019) in relevant areas.</p>
GLWC-C2-229 Friends of Merlin Woods	Submission requests update to wording of policy 9.7.4 – ‘Ensure the design of external lighting does not have an adverse impact on wildlife and ecosystems and encourage the use of dark zones and sensor lighting where feasible. <i>Keep important wildlife areas free from lighting, dark zones are needed for the future of some of our wildlife species</i> ’	<p>CE Response</p> <p>The point raised regarding wording of Policy 9.7.4 is noted. It is considered that amendment to Section 9.9 Light Pollution narrative in response to submission from Department of Housing, Local Government and Heritage will ensure relevant guidance to minimise the impact of lighting on wildlife will inform the assessment of development proposals.</p>
9.10 - Waste Management		
Submission No.	Submission Summary	CE Response and Recommendation

GLWC-C2-27 Grainne Faller GLWC-C2-171 Roselyn Carroll	<p>Submissions refer to litter management in Galway and include request to consider universal access to bins and bottle banks. Current bins on the Prom and some city bins which are too high. Submission notes that Prom bins are too large, unsightly, obstructs the view of the sea and should require planning permission.</p> <p>Ensure that bottle banks require planning permission and are subject to working hours. State penalties if not respected due to impact on communities and environment from noise and disturbance.</p>	CE Response Comments are noted. The specification for the provision of bins in the city is an operational issue and outside the scope of the development plan and controlled through the Environment Section.
GLWC-C2-150 Angela Casey	<p>Submissions refers to litter management in Munster Avenue area. Submission states that the provisions in the city Plan are insufficient. A dedicated policy provision is required to ensure that waste from commercial operators in all city centre and inner city residential areas is only put out for collection at designated times and sites, and the commercial operator takes the waste. There are numerous records of dumping of waste in Munster Avenue, including mattresses and bags of commercial waste, with residential streets being impassable because of waste stockpiled over the weekend. One such photograph is included below. It was obviously dumped by a commercial operator in breach of Galway City Council (Segregation, Storage and Presentation of Household and Commercial Waste) Bye-laws, 2019.</p>	CE Response Comments are noted and will be referred to the Council's Environment Section. Waste management in the city is guided by the Galway City Council Waste Bylaws - <i>Segregation, Storage and Presentation of Household and Commercial Waste Bye-laws</i> and is therefore outside the remit of the development plan.
GLWC-C2-179 Department of the Environment, Climate and Communications	<p>Submission from DECC commends the approach to addressing the Circular Economy in the Draft Plan and request that policies be enhanced to accommodate any future, revised or emerging Circular Economy strategies over the lifetime of the Plan.</p> <p>DECC requests that the Council consult directly with the Regional Waste Management Planning Office regarding development of the final plan.</p>	CE Response Support for the Circular Economy section is welcomed and request to amend policy to include reference to accommodate any future, revised or emerging Circular Economy strategies over the lifetime of the Plan is noted. It is considered to be already addressed by reference to emerging legislation and national strategy (Policy 2.1 Circular Economy and Policy 9.8 Waste Management). The council have ongoing collaboration with the Regional Waste Management Office.

GLWC-C2-118 Ibec	<p>Submission refers to the Circular Economy. The European Green Deal and Ireland's National Waste Policy 2020-2025 objectives now is the near elimination of waste through the development of a circular economy where products and packaging are designed, manufactured, and distributed in such a way that they remain in circulation as long as technically possible. Ibec strongly supports this objective. The current linear take-make-waste approach is not compatible with future demographic growth and resource availability. Ireland is already struggling to manage current levels of waste production. We produce approximately 14 million tonnes of waste each year and export 38% of this for recycling and recovery. As Galway is the third most populous county in Ireland, its transition to a circular economy must form a key part of the Development plan. The plan must develop the necessary infrastructure and assist businesses, communities and public entities make the necessary transformations.</p>	<p>CE Response</p> <p>The points raised regarding the circular economy are noted. The draft plan recognises that the transition to a circular economy as central to national climate and waste policy and includes policy support in Chapters 2 and 9 for the implementation of emerging legislation and strategies relating to the circular economy including the Circular Economy Programme 2021-2027 and the creation of a waste management system in the city that aligns with circular economy principles.</p>

9.11 - Telecommunications		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-118 Ibec	<p>Submission refers to the expanding role of the digital economy and the need to support the provision of digital infrastructure and smart technologies which are critical economic and social enablers. A Smart Region, embedding digital technology across many functions will enhance Galway's competitiveness, attractiveness and economic resilience. Rapid roll out of the National Broadband Plan (NBP) is essential as 23% of homes and businesses in the State currently without high-speed broadband. Submission calls for Galway City Council to remove any unnecessary administrative or regulatory obstacles to achieving this. Submission calls for Local Authority Broadband Officers should be empowered to co-ordinate the local implementation of any necessary changes. Submission</p>	<p>CE Response</p> <p>The points raised regarding the digital economy and the provision of telecommunications infrastructure are noted. The draft plan is cognisant of the importance of high quality telecommunications infrastructure for Galway as an enabler of social and economic activity and the ongoing development of the knowledge economy in the city. Policy support for the expansion of the of telecommunication infrastructure including the broadband network is included in Policy 9.9 Telecommunications and Smart Technology. Regarding the location telecommunications masts and antenna the Council will have regard to the guidelines issued by the Department of Telecommunications Antennae and Support Structures (DECLG, 1996) and Circular Letter PL07/12.</p>

	calls for the Development Plan to support 5G infrastructure deployment.	
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9.12 - A Smart City		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-118 Ibec	Submission refers to a benefits of smart cities and requests that the Development Plan support the development of digital infrastructure and Galway as a Smart City.	<p>CE Response</p> <p>The points raised regarding Galway as a Smart City are noted. The development plan includes support for the development of Galway as a Smart City. Policy 6.4 Knowledge Economy, Technology Industries & Life Sciences states to <i>promote a Smart City approach through the application of new innovations and digital technologies to support economic growth, citizen engagement, enhance the quality and performance of urban services and to reduce costs and consumptions of resources.</i></p> <p>Section 9.2 A Smart City supports the rollout of digital infrastructure and policy Policy 9.9 Telecommunications and Smart Technology includes:</p> <p class="list-item-l1">4. <i>Facilitate the rollout of digital infrastructure to implement a world class digital infrastructure and sensor network that will provide real time data and smart city solutions and</i></p> <p class="list-item-l1">5. <i>Support the actions of the draft Galway City Digital Strategy (2020-2024).</i></p>

9.13 - Energy and Associated Infrastructure		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-38 Transport	Submission from TII references Policy 9.10 Energy and Associated Infrastructure and Section 11.18 Renewable Energy	CE Response

Infrastructure Ireland	<p>Sources and notes the preference for national transmission grid system and energy networks in the city to be underground where at all possible. TII advises that such underground connections have the potential to result in technical road safety issues such as differential settlement due to backfilling trenches and can impact on ability and cost of general maintenance and safety works to existing roads. It is recommended that grid connections proposals should be developed which safeguard the strategic function of the national road network by utilising available alternatives.</p> <p>TII would welcome an objective included in the plan in relation to renewable energy and in relation to safeguarding the strategic function of the national road network in accordance with Government policy by utilising available alternatives.</p>	<p>The points raised by TII are noted. These are considered to be construction management issues which are outside the remit of the development plan.</p> <p>Policy 4.6 Road and Street Network and Accessibility includes to support national policy and guidance with regard to protection of the National Road network and that development objectives will be in accordance with the DOECLG Spatial Planning and National Roads Guidelines (2012).</p>
GLWC-C2-123 Owen Hanley	<p>The Draft City Development Plan should incorporate a policy (9.10) of ensuring future national energy grid infrastructure to be underground and also that existing above ground infrastructure should be placed underground such An Sean Bhaile, given the impact it has on a community.</p>	<p>CE Response</p> <p>Policy 9.10.1 supports the undergrounding of national energy grid infrastructure.</p>
GLWC-C2-211 SSE plc	<p>Submission from SSE states that the company is in the process of co-developing a proposal for the development of a hydrogen production, storage, and distribution pathfinder project to be known as Galway Hydrogen Hub ('GH2'). The GH2 consortium's intention is to develop an initial flagship demonstrator project at Galway Harbour, for the indigenous production and supply of clean green hydrogen fuel for public and private vehicles. This will include buses and trucks and deliver a multi-modal, zero emission, renewable hydrogen transport hub that can be easily replicated across Ireland. The intended hydrogen transport hub could be expected to be fully operational by the second half of 2024.</p> <p>Submission outlines that Ireland Policy on Hydrogen and states that the Programme for Government 2020 commits to a</p>	<p>CE Response</p> <p>The development of the Galway Green Hydrogen Hub is addressed in Section 11.2.5 in relation to the I zoned lands at Lough Atalia which supports the broader function of Galway Port for sustainable energy activities including green hydrogen and appropriate low emission industrial activities.</p> <p>It is also proposed that text be included in Section 9.13 Energy and Associated Infrastructure – Renewable Energy to address emerging energy technologies such as green hydrogen and the development of a green hydrogen hub at Galway Port, subject to compliance with relevant planning considerations.</p>

	<p>transformational programme of research and development, to ensure that Ireland is at the cutting edge of scientific and technological innovation in meeting our climate change targets, including green and clean hydrogen. The Climate Action Plan 2021 contains a commitment to developing the State's hydrogen capacity and government has committed to developing and publishing its hydrogen strategy by in Q4 of 2022. This fuel source is, therefore, set to become even more central in the transition to Net Zero by 2050.</p> <p>Submission requests the inclusion of objective to Development Plan to 'Support the research, development, and commercialisation of green hydrogen as a fuel for power generation, manufacturing, energy storage and transport.'</p>	<p>CE Recommendation</p> <p>Amend Section 9.13 Energy and Associated Infrastructure – Renewable Energy to include text outlined in green as follows:</p> <p>The RSES identifies the huge potential for off-shore wind energy as a considerable resource to be explored and the need for adequate provision of land based infrastructure and services. In particular, the Port of Galway is ideally placed to support the offshore renewable energy sector. This would complement their current role in supporting special project related imports including infrastructure for windfarms in the region. The Council will also facilitate the development of emerging energy technologies such as green hydrogen and the development of a green hydrogen hub at Galway Port, subject to compliance with relevant planning considerations.</p>
GLWC-C2-119 Electricity Supply Board	<p>Electricity Infrastructure - ESB</p> <p>ESB strategy is to develop and connect renewables to decarbonise the electricity system by 2040 through investment in sustainable energy solutions that harnesses the power of solar, wind, wave and storage.</p> <p>ESB request inclusion of specific policies to support new technologies such as battery storage and green hydrogen.</p> <p><i>"Promote the use of efficient energy storage systems and infrastructure that support energy efficiency and reusable energy system optimisation, subject to compliance with proper planning and environmental considerations.</i></p> <p><i>Support the research and development of green hydrogen as a fuel for power generation, manufacturing, energy storage and transport.</i></p> <p>ESB note that electricity generation will still be required to some extent from non-renewable sources and request the insertion of</p>	<p>CE Response</p> <p>This submission is noted.</p> <p>The request to include policy to support new technologies is included in the recommended amended text in Section 9.13 set out above and in the policy in relation to Galway Port. In relation to efficient energy storage systems and infrastructure, it is considered that an amendment to support same could be included in Policy 9.10 Energy and Associated infrastructure</p> <p>CE Recommendation</p> <p>Amend Policy 9.10 Energy and Associated infrastructure to include an additional policy point – text inserted in green as follows:</p> <p>4. Promote the use of efficient energy storage systems and infrastructure that support energy efficiency and reusable energy system optimisation, subject to compliance with proper planning and environmental considerations.</p>

	<p>text to support from such sources in times of high energy demand.</p> <p><i>"It must also be recognised that natural gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand."</i></p> <p>ESB are developing a network of EV charging points and hubs and plans investment in green hydrogen production, storage and generation facilities and welcomes support for EVs in the draft plan.</p> <p>ESB welcomes inclusion of its lands within the Sandy Road Regeneration site and consider it to be an ideal location for high-density, sustainable, mixed use development.</p>	
GLWC-C2-179 Department of the Environment, Climate and Communications	<p>DECC requests that Section 9.13 be updated to reflect the increased ambitions under the Climate Action Plan 2021 (i.e. up to 80% renewable energy by 2030).</p> <p>DECC encourage the Council to contact the Department's Heat and Business Energy Efficiency Division with regard to promotion of district heating.</p>	<p>CE Response</p> <p>The request to update Section 9.13 to reflect revised ambitions regarding renewable energy under the Climate Action Plan 2021 and to liaise with the Heat and Business Energy Efficiency Division of the DECC regarding the promotion of district heating is noted.</p> <p>CE Recommendation</p> <p>Amend Section 9.13 Energy and Associated Infrastructure- Renewable Energy to include text in green and delete text with strikethrough as follows:</p> <p>Ireland is committed to generating 70% <ins>80%</ins> of its electricity requirements from renewable energy by 2030 (Climate Action Plan 2021). This will <ins>reduce greenhouse gas emissions generated by electricity and facilitate the reduction of emissions in other sectors such as transport and heating through electrification</ins>. In order to meet the increased demand for renewable electricity the government through the Renewable Electricity Support Scheme (RESS) is committed to increasing capacity across a</p>

		number of sectors by 2030 including offshore wind and renewable energy, onshore wind and solar.
GLWC-C2-187 Brendan Smith	Submissions refer to requirement to promote development of renewable energy infrastructure in the city.	CE Response The draft plan supports the increase in use of renewable energy and development of renewable energy infrastructure through Policy 2.3. Chapter 9 of the plan outlines the potential of small scale/microgeneration of electricity. Exemptions from planning permission are provided for the installation of micro scale renewable energy infrastructure in domestic dwellings, business premises and industrial settings including solar panels, heat pumps, wind turbines and combined heat and power systems. Within the wider context of developing renewable energy infrastructure consideration will also be given to the development of hydro electric energy schemes.
GLWC-C2-188 Siobhan Fitzgerald		

Chapter 9 Environment and Infrastructure: CE Recommendations

1. Amend Policy 9.1 Flood Risk No.3 – insert text in green and delete text with ~~strikethrough~~ as follows:
 3. Ensure the recommendations of the Strategic Flood Risk Assessment (SFRA) for the Galway City Development Plan 2023-2029 are taken into consideration in the assessment of developments in identified areas of flood risk. ~~And~~ Require site specific Flood Risk Assessment (FRA) and associated design and construction measures appropriate to the scale and nature of the development and the risks arising, in all areas of identified flood risk ~~where appropriate~~ including on sites where a only small proportion of the site is at risk of flooding and adopt a sequential approach in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009).
2. Amend Policy 9.3 Water Services – insert additional policy points in green as follows:
 8. Support the development and implementation of Drinking Water Safety Plans by Irish Water, which seek to protect human health by identifying, assessing and managing risks to water quality and quantity; taking a holistic approach from source to tap.
 9. Support the promotion of effective management of trade discharges to sewers by Irish Water in order to maximise the capacity of existing sewer networks and minimise detrimental impacts on sewage treatment works.
3. Amend text in Section 9.9 Light Pollution, second paragraph – insert text in green as follows:

In assessment of development proposals the Council will have regard to the Guidance Note GN01/21 The Reduction of Obtrusive Light – Institute of Light Professionals (2021); EUROBATS Series No. 8 publication, Guidelines for consideration of bats in lighting projects (2018) and Dark Sky Ireland Lighting Recommendations (2019) in relevant areas.
4. Amend Section 9.13 Energy and Associated Infrastructure – Renewable Energy to include text outlined in green as follows:

The RSES identifies the huge potential for off-shore wind energy as a considerable resource to be explored and the need for adequate provision of land based infrastructure and services. In particular, the Port of Galway is ideally placed to support the offshore renewable energy sector. This would complement their current role in supporting special project related imports including infrastructure for windfarms in the region. ~~The Council will also facilitate the development of emerging energy technologies such as green hydrogen and the development of a green hydrogen hub at Galway Port, subject to compliance with relevant planning considerations.~~
5. Amend Policy 9.10 Energy and Associated infrastructure to include an additional policy point – text inserted in green as follows:
 4. Promote the use of efficient energy storage systems and infrastructure that support energy efficiency and reusable energy system optimisation, subject to compliance with proper planning and environmental considerations.
6. Amend Section 9.13 Energy and Associated Infrastructure- Renewable Energy to include text in green and delete text with ~~strikethrough~~ as follows:

Ireland is committed to generating ~~70%~~ 80% of its electricity requirements from renewable energy by 2030 (Climate Action Plan 2021). This will reduce greenhouse gas emissions generated by electricity and facilitate the reduction of emissions in other sectors such as transport and heating through electrification. In order to meet the increased demand for renewable electricity the government through the Renewable Electricity Support Scheme (RESS) is committed to increasing capacity across a number of sectors by 2030 including offshore wind and renewable energy, onshore wind and solar.

Other recommended amendments referenced in this Section that apply to other draft plan chapters.

7. Amend Section 11.9 Commercial and Industry 11.9.1 General – insert text in green as follows:

Infrastructural requirements with respect to water will require evidence to be provided by the developer of consultation with Irish Water prior to applying for planning permission to ensure that adequate water services will be available to service the development and that existing water services will not be negatively impacted.

Other recommended amendments to this Chapter as set out in the OPR response

8. Amend Policy 9.1 Flood Risk to include text in No. 2 outlined in green as follows:

2. Support and facilitate the implementation of the Coirib go Cústa Galway City Flood Relief Scheme in conjunction with the OPW to support a climate resilient city, protect against flooding and minimise the impact of future climate events. Support in general the associated mitigation and adaptation measures in order to prevent flooding and coastal erosion, subject to appropriate environmental, visual, built heritage and other relevant considerations. **Ensure zoning or development proposals support and do not impede or prevent the progression of these measures.**

9. Amend Policy 9.1 Flood Risk to insert text in No. 3 outlined in green and delete text by ~~strikethrough~~ as follows:

3. Ensure the recommendations of the Strategic Flood Risk Assessment (SFRA) for the Galway City Development Plan 2023-2029 are taken into consideration in the assessment of developments in identified areas of flood risk and require site specific Flood Risk Assessment (FRA) and associated design and construction measures ~~where appropriate~~ **in all areas of identified flood risk and adopt a sequential approach in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009).**

10. Amend Section 9.5 - Sustainable Urban Drainage Systems (SuDS) fourth paragraph to insert text outlined in green and delete text by ~~strikethrough~~ as follows:

LAWPRO in conjunction with the DHLG are developing an implementation strategy for the development of Water Sensitive Urban Design, which includes nature based SuDS and when completed will provide useful guidance in an urban context. The draft River Basin Management Plan also recognises the benefits of using nature based surface water management and the need to move away from engineering solutions. In this regard, ~~an action of the draft RBMP is to provide interim guidance to local authorities on measures to be implemented to support the delivery of a greater focus on nature based solutions in advance of a national implementation strategy. The Council will have regard to this guidance when published and in the interim will consider international best practice guidance manuals. Nature Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document' (DHLG) (November 2021), has been prepared in order to provide guidance on measures to be implemented to support the delivery of a greater focus on nature based solutions. The council will have regard to this interim guidance in advance of a national implementation strategy.~~

Chapter 10: Compact Growth and Regeneration

10.1 - Context		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-113 PJ Canny	<p>Amend the “Urban Density and Building Heights Study” to consider increased building heights at Raven Terrace and designate the Former Corrib Service Station as a Regeneration Site.</p> <p>This is supported by Section 28 Building Heights Guidelines published by the Department of Housing, Planning & Local Government sets out national planning policy guidance on building heights in urban areas.</p> <p>These acknowledge that increasing prevailing building heights has a critical role to play in addressing the delivery of consolidated urban development in particular “fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres.”</p> <p>The development is located in an area where these Guidelines advise that a minimum of building height of at least 6 storeys should be considered. The subject lands are also located within a convenient walking distance to city centre transport hubs, and where excellent pedestrian connectivity networks exist. Therefore, the principle of increase building heights is supported by the Guidelines at this location.</p> <p>Amend “General Development Standard-City Centre Area-Plot Ratio” to allow for the consideration of a “General Maximum” Plot Ratio of 2:1 within the CC zone at Ravens Terrace.</p> <p>The subject site (c. 0.22ha in size) is located at the semi-derelict former Corrib Service Station, which has remained underutilised</p>	<p>CE Response</p> <p>A number of Regeneration and Opportunity Sites have been identified in the Core Strategy, in accordance with the NPF National Strategic Outcome NSO1 Compact Growth, as having a capacity to accommodate growth, within the plan period and into the longer term. A range of sites were considered in the city and those designated were chosen by virtue of meeting a range of criteria including that they can support a compact sustainable form and have potential for transformative redevelopment. It is considered that this site does not have the characteristics of a Regeneration and Opportunity Site. The site is a constrained and challenged site with a shallow depth which does not lend itself to redevelopment of a nature and scale expected on the Regeneration and Opportunity Sites. It is considered that the current CC zoning objective will, regardless of such designation, enable a sustainable mixed use development at this location.</p> <p>The plot ratio to be achieved on the site will be determined as part of any redevelopment application. Given the restricted nature of the site which will require a sensitive urban design resolution to ensure protection of amenities of adjacent properties and having regard to the sensitive context of the site, the prevailing density is considered appropriate and sufficient to allow for generous redevelopment as achieved on previous undeveloped planning consents. It is not recommended that the plot ratio be increased at this location.</p> <p>It should also be noted that this site is within an identified flood risk area where scale of development may be required to be tempered to address such constraints. In this regard no change is recommended in the draft plan.</p>

	<p>since 1998. The site consists of two unused petrol pumps on the public sidewalk of Lower Fairhill Road and a 2-storey masonry shed that housed the garage premises occupying the totality of the site. The site forms a part of a prominent 'urban island block' which is demarcated by Raven Terrace to the east, Lower Fairhill Road to the west and the public car park at Father Griffin Road to the south. The subject site consists of an infill and brownfield site on a prominent "Corner site", at one of the main approaches to Galway City Centre.</p> <p>The subject site consists of a valuable and high profile corner site positioned at a prominent gateway location at the western entrance to Galway City Centre. This brownfield site has remained underutilised since the closure of the Corrib Service Station in 1998.</p> <p>It is noted that although the subject lands are zoned "CC", this is subject to a lower "Plot Ratio" standard of 1.6:1 compared to the rest of the City, which is at 2.0:1.</p> <p>It is considered that this lower Plot Ratio Standard of 1.6 is outdated and is contrary to the overarching principles of National & Regional Planning Guidance, which encourages higher densities at such centrally located infill/brownfield sites.</p>	
GLWC-C2- 148 Galway City Community Network	Local Area Plans Local Area Plans should be prepared for all significant regeneration and opportunity sites in the city rather than requiring developers to prepare masterplans, frameworks plans or spatial frameworks. This will enable meaningful participation by local communities and key stakeholders.	CE Response It is not considered appropriate to prepare local area plans for all significant Regeneration and Opportunity Sites in the city. Their redevelopment can be accommodated satisfactorily within the policy framework of the draft plan and associated specific site guidance. Any proposals will be subject to the standard development management process which includes for public notice and a statutory period for interested parties to participate in the planning process. The development management process also includes for referral to prescribed bodies. It also facilitates further public engagement with the option of appeal to An Bord Pleanála. The inclusion of a requirement in the draft plan to prepare masterplans, frameworks plans or spatial frameworks is to ensure that redevelopment proposals are
GLWC-C2- 228 Galway Environment al Network	Prepare statutory Local Area Plans for the Headford Road area, Murrough, the city centre, including the Inner Harbour and Ceannnt Station lands, the regeneration area to the east side of Eyre Square, the Harbour Lands and Nun's Island.	

GLWC-C2- 227 Brendan Mulligan	<p>Make appropriate provision in these LAPs to protect and restore biodiversity including connectivity to surrounding areas of biodiversity.</p> <p>Fingal County Council has been an exemplar in including biodiversity and green infrastructure.</p> <p>There is too much reliance on developer-led planning. Developers are required to prepare masterplans. Framework plans, spatial frameworks for a whole range of regeneration and opportunity sites.</p>	<p>considered in a holistic and integrated manner at the very earliest stage of planning and urban design.</p> <p>The inclusion of these requirements is over and above the standard development management required documents. It is considered a positive requirement in that it puts an onus on the applicant to consider all aspects of urban design, placemaking and traffic impact in a comprehensive manner. For larger sites, it facilitates how phasing proposals can be accommodated into design. The draft plan approach to development is a plan led approach supported by the strategic Core Strategy, environmental assessments and development management guidelines and standards.</p> <p>Detailed guidance with regard to preparation of plans and frameworks are included in the draft plan and UDBH study. LAPs are proposed for the Headford Road area and Murrough and biodiversity and green infrastructure will be important issues to be addressed in these plans.</p>
GLWC-C2- 118 Ibec	<p>Regeneration and Attractiveness for Entrepreneurship, Business Investment (FDI), Talent and Tourism.</p> <p>There is a strong interdependence between the planning, development and creation of an attractive environment and enterprise development. Establishing a strong sense of place contributes to the attractiveness factors for entrepreneurship, for business investment, for foreign direct investment (FDI), talent and tourism.</p> <p>The focus must be on re-intensification of existing business locations. This strategy aims to create the right conditions for enterprise to thrive, to create wealth and improve quality of life for all. Key aspects are orderly growth, placemaking, smart specialisation and clustering.</p> <p>Galway city must be developed in terms of its economic self-sufficiency to minimise the need for commuting and support the development of surrounding areas. This would support locally generated employment and create prospects for growth.</p> <p>Employment creation will come from a broad base of possible</p>	<p>CE Response</p> <p>This submission is welcome and the CE concurs with the content. The policy framework set out in the draft plan is consistent with this submission. It aligns with the national/regional framework which designates Galway as a regional city and driver of economic growth and includes policy to facilitate this growth including the designation of particular areas for growth and regeneration, for mixed use development, enterprise hubs, integration of land use and transportation, placemaking and sustainable neighbourhoods.</p> <p>The Core Strategy of the plan is a robust evidenced based strategy for future sustainable development, arrived at following a detailed analysis of population and land use in the city taking into account a range of factors, in particular proximity to public and sustainable transport facilities, accessibility, availability of infrastructure, proximity to services and amenities. It reflects the approach of the NPF supporting compact growth. It supports the implementation of a range of other plans, strategies and projects to support a sustainable city including the Galway Transport</p>

	<p>activities; it is critical that potential is recognised and supported across a range of possible sources both indigenous and from overseas.</p> <p>The city centre will have to be rejuvenated but it will also need to be reimagined. The city must be able to adequately respond to trends that have accelerated over recent years, including the effects of continued growth in hybrid working and online retail. Increasing footfall is one priority and is important to helping town centre businesses navigate the current crisis. The rapid acceleration of remote working will present challenges to encouraging “reverse commuting” in attracting people into the urban centres from home after work.</p> <p>The plan must support research and innovation hubs and incubation facilities within the city. The city centre is the location of a growing innovation district which hosts start-ups and incubator type enterprises.</p> <p>Meeting the objectives in terms of delivering new jobs and investments, requires an adequate supply of commercial and residential property, attractive areas to live and availability of skills. These underpin regional and local value propositions.</p>	<p>Strategy, the Public Realm Strategy, the Local Economic and Community Plan and the Coirib go Costa Galway Flood Relief Scheme.</p>
GLWC-C2- 118 Ibec	<p>Compact Growth - Building Height and Density</p> <p>Compact, urban growth must be implemented through effective alignment of the Development plan with the NPF. The city metropolitan area and other large urban centres should be targeted to house a growing population through compact growth, in line with national and regional policy. This requires infrastructure and service provision, ranging from transport, energy, and water infrastructure through to healthcare, social services and investment in education.</p> <p>A focus on height will allow us to address the problems of urban sprawl, housing and commercial space shortages and improved densification.</p>	<p>CE Response</p> <p>The draft plan aligns with the national/regional framework and reflects the approach of the NPF supporting compact growth.</p> <p>An Urban Density and Building Height Study was prepared and is reflected in the policy framework of the draft plan. It took into account a number of relevant criteria in determining density and height including the proximity to public transport networks, availability of infrastructure, surrounding context, and the historic context.</p> <p>The Core Strategy of the plan is a robust evidenced based strategy for future sustainable development, arrived at following a detailed analysis of population and land use in the city taking into account a range of factors, in</p>

	<p>While it is important that the current heritage of the city is preserved, it is important that the new city Development Plan allows for increased height in developments.</p> <p>Galway city would benefit greatly from a specific tall buildings strategy, earmarking locations for such development that can both ensure greater density while also respecting the local heritage.</p> <p>Building for height and density, is key to the sustainable growth of cities and is necessary for increasing housing supply in urban areas. Transport infrastructure, the cost of living, sustainability, and the built environment are all affected by how well space is utilised and they play a role in determining the quality of life.</p>	<p>particular proximity to public and sustainable transport facilities, accessibility, availability of infrastructure, proximity to services and amenities.</p>	
GLWC-C2- 72 Land Development Agency	<p>Rezone all Regeneration and Opportunity Sites</p> <p>Suggest that all regeneration and opportunity sites be rezoned OS-RE Opportunity Sites for Regeneration and that residential development is included within the list of compatible uses in this zone.</p>	<p>CE Response</p> <p>It is not recommended that the designated Regeneration and Opportunity Sites be given a specific land use zoning. These sites have different characteristics and functions which are reflected in particular land use zoning objectives. These sites do not lend themselves to a single common land use zoning. It is considered that the existing zonings on these sites do not inhibit their redevelopment for the purposes as outlined in Chapter 10.</p> <p>In order to give further clarity and to reinforce the ambitions to deliver regeneration on designated Regeneration and Opportunity Sites including for residential development where appropriate, it is recommended that the draft plan be amended to include in the relevant zoning objectives that mixed use development including residential on Regeneration and Opportunity Sites will be uses which are compatible with and contribute to the zoning objective.</p> <p>CE Recommendation</p> <p>Amend Section 11.2.6 Commercial/Industrial CI Land Use Zoning Objective and insert text in green as follows:</p> <table border="1"> <tr> <td>Zoning Objective CI To provide for enterprise, light industry and commercial uses other than those reserved to the CC zone</td></tr> </table>	Zoning Objective CI To provide for enterprise, light industry and commercial uses other than those reserved to the CC zone
Zoning Objective CI To provide for enterprise, light industry and commercial uses other than those reserved to the CC zone			

		<p>Uses which are compatible with and contribute to the zoning objective, for example</p> <ul style="list-style-type: none"> – Warehousing/Storage – Retail of a type and of a scale appropriate to the function and character of the area – Specialist offices – Offices of a type and of a scale appropriate to the function and character of the area – Light Industry – Accommodation for the Traveller Community – Childcare facilities – Community and cultural facilities – Allow for development of Regeneration and Opportunity Sites in accordance with the provisions of Chapter 10 and Policy 10.2 Strategic Regeneration and Opportunity Sites, particularly where it is identified to provide for mixed use development which includes for residential. 	
		<p>Amend Section 11.2.7 City Centre Land Use Zoning Objective and insert text in green as follows:</p> <table border="1" style="width: 100%;"> <tr> <td>Zoning Objective CC To provide for city centre activities and particularly those, which preserve the city centre as the dominant commercial area of the city</td></tr> </table>	Zoning Objective CC To provide for city centre activities and particularly those, which preserve the city centre as the dominant commercial area of the city
Zoning Objective CC To provide for city centre activities and particularly those, which preserve the city centre as the dominant commercial area of the city			

		<p>Uses which are compatible with and contribute to the zoning objective, for example</p> <ul style="list-style-type: none"> – Retail – Residential – Offices, banks and professional services – Tourist related uses – Cultural and community uses – Buildings for education – Recreation – Childcare facilities – Places of worship – Allow for development of Regeneration and Opportunity Sites in accordance with the provisions of Chapter 10 and Policy 10.2 Strategic Regeneration and Opportunity Sites, particularly where it is identified to provide for mixed use development which includes for residential. 	
GLWC-C2- 230 Dept. Housing, Local Government and Heritage	<p>Archaeological and cultural heritage</p> <p>The National Monuments Service advise that master planning and development proposals for the Ceannt Quarter, Inner Harbour, Nuns Island, Royal Tara China, Shantalla Road and Eyre Square East Regeneration and Opportunity sites have regard to archaeological and cultural heritage and be informed by archaeological baseline studies and impact assessments.</p>	<p>CE Response</p> <p>Having regard to the advice of the National Monuments Service it is recommended that the draft plan be amended to include a specific objective in Section 10.27 in relation to heritage and assessments.</p> <p>CE Recommendation</p> <p>Amend Section 10.27 Specific Objective and Include the following specific objective outlined in green:</p> <p>Regeneration and Opportunity Sites</p> <p>5. Require the preparation of masterplans and spatial frameworks to inform development proposals.</p> <p>6. Master plans, spatial frameworks and development proposals for the Ceannt Quarter, Inner Harbour, Nuns Island, Royal Tara Site, Shantalla</p>	

		Road and Eyre Square East Regeneration and Opportunity Sites shall have regard to archaeological and cultural heritage and be informed by archaeological baseline studies and impact assessments and Policy 5.2 Protected Spaces: Sites of European, National and Local Ecological Importance.
GLWC-C2- 230 Dept. Housing, Local Government and Heritage	Nature Conservation The department recommend text is added within Chapter 10 in relation to specific sites to ensure compatibility with nature conservation and biodiversity protection and to ensure potential issues have been addressed in Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Ecological Impact Assessment (ECiA) as appropriate.	CE Response It is considered that requirements for SEA/AA and ECiA are sufficiently addressed in Chapter 5 and Chapter 11. Similarly policy in relation consideration of nature conservation and biodiversity which pertains to all development including sites identified in Chapter 10 is set out in Chapter 5 and standards and guidelines set out in Chapter 11.
GLWC-C2- 141 National Transport Agency	Masterplans / LAPs - NTA With regard to masterplans on Regeneration and Opportunity sites, the NTA note that as per government guidelines, they can supplement or complement but not replace statutory plans. The NTA would welcome consultation with all such plans and it may be appropriate to develop LTPs for these sites depending on the scale of the area. The NTA recommends that the LAPs for Headford Road and Murrough areas be accompanied by Local Transport Plans.	CE Response The inclusion of a requirement in the draft plan to prepare masterplans, frameworks plans or spatial frameworks is to ensure that redevelopment proposals are considered in a holistic and integrated manner at the very earliest stage of planning and urban design. They are not intended to replace the statutory development plan. The inclusion of these requirements is over and above the standard development management required documents. It is considered a positive requirement in that it puts an onus on the applicant to consider all aspects of urban design, placemaking and traffic impact in a comprehensive manner. For larger sites, it facilitates how phasing proposals can be accommodated into design. The detail of any redevelopment proposals will come forward as a planning application which includes for referral to prescribed bodies. The transport assessment aspect will be an integral aspect of the overall assessment of any development proposals on these sites. Development management standards and guidelines set out in Chapter 11 include for assessment of traffic impact. An amendment to the plan is proposed to Chapter 11 to provide for area based transport assessment as part of masterplans and

		spatial frameworks where appropriate. This amendment is set out in the CE report in relation to Chapter 4 Sustainable Mobility and Transportation.
10.2 - City Centre		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-191 Bowling Green Residents' Association	<p>Policy 10.1 City Centre: Proposed amendments</p> <p>Encourage a living city centre by requiring a long-term residential content in new developments and promoting...</p> <p>Encourage use of vacant upper floors in the city centre and promote long-term city centre living through measures such as the Living City initiative.</p> <p>Maintain and enhance the environmental quality of the city centre to support long-term city centre living</p> <p>In the core of the City Centre, the Market Street car park is a significant brownfield site ever since the Mon was demolished 40 years ago. Please include this site in the policy on city centre regeneration along with the other sites identified such as the Ceannt Quarter and the Inner Harbour. Any residential proposal for this site must include for long-term residential so as to contribute to the living city.</p> <p>The text on both the Ceannt Quarter and the Inner harbour should be amended to state 'the use mix shall provide for a minimum long-term residential content on the site ...'</p>	<p>CE Response</p> <p>The ambition for the provision of long term accommodation is noted. It is considered that the draft plan addressed the need to have a balanced mix of accommodation to meet the needs of the population. It includes in Policy 3.1 Housing Strategy, to support a diverse range of housing types, size and tenures and endeavour to meet the demand for Owner Occupier housing as projected in the Housing Strategy and the Housing Need and Demand Assessment (HNDA).</p> <p>It also includes in Policy 3.1 to ensure the provisions of the Residential Tenancies (Amendment) Act 2019 and the Planning and Development Act 2000 (Exempted Development) (No. 2) Regulations 2019 are applied where planning permission is required to control short-term letting accommodation to prevent a negative impact on housing supply and /or an over-concentration of such uses. Notwithstanding this, where planning consent is required under legislation for short term letting, there will be a presumption against allowing such a use in view of the status of the city defined as a rent pressure zone.</p> <p>Section 3.8 Sustainable Neighbourhoods: City Centre Residential Areas also includes that the Council will continue to support initiatives such as the Living City Initiative which encourages refurbishment of older buildings.</p> <p>A number of Regeneration and Opportunity Sites have been identified in the Core Strategy, in accordance with the NPF National Strategic Outcome NSO1 Compact Growth, as having a capacity to accommodate growth, within the plan period and into the longer term. A range of sites were considered in the city and those designated were chosen by virtue of meeting a range of criteria including that they can support a compact</p>

		sustainable form and have potential for transformative redevelopment. It is considered that this site does not have the characteristics of a Regeneration and Opportunity Site. The site is a constrained and challenged site with which does not lend itself to redevelopment of a nature and scale expected on the Regeneration and Opportunity Sites. It is considered that the current CC zoning objective will, regardless of such designation, enable a sustainable mixed use development at this location. It is noted that this site has had the benefit of unactivated planning permission in the past.
GLWC-C2-127 Roselyn Carroll	<p>Definition of City Centre Area</p> <p>Clarify if the red markings in Figure 10.1 such that it is not inferred that this is in fact the definition of the City Centre.</p> <p>Clarify at the start of the plan that the use of the term 'City Centre' is referring the area inside the red line shown in Figure 10.1.</p> <p>Rationale: The terms are used interchangeably in reports and Development Plan without specific planning and geographical definition.</p>	<p>CE Response</p> <p>The city centre is as defined in Fig. 10.1 for the purposes of the development plan and identified in the supporting statutory maps. It is noted that other definitions of the city centre may be included in reports and other documents. This reflects the multi-functional nature and diversity of the city centre.</p>

10.3 - Regeneration and Opportunity Sites

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-107 B. Fitzgerald	<p>Include Oasis Nightclub as a Regeneration and Opportunity Site.</p> <p>This site would be consistent with the description and characteristics of "Regeneration and Opportunity Sites" outlined in the Draft CDP.</p> <p>It is requested to include a new "Specific Development Objective" for these CI lands to state;</p> <p>"CI Lands at former Oasis Nightclub Site, Salthill. A residential content of up to 100% will be considered on these lands."</p>	<p>CE Response</p> <p>A number of Regeneration and Opportunity Sites have been identified in the Core Strategy as having a capacity to accommodate growth, within the plan period and into the longer term. A range of sites were considered in the city and those designated were chosen by virtue of meeting a range of criteria including that they can support a compact sustainable form and have potential for transformative redevelopment. It is considered that this site does not have the characteristics of a Regeneration and Opportunity Site. The site is a constrained and challenged infill site. It is an awkward,</p>

	<p>The requested amendment to allow for up to 100% Residential Content on this brownfield and infill site, will allow for greater land use flexibility, and accords with National & Regional Planning Policy as well as the overarching planning principles as set out in the Draft CDP.</p> <p>The consideration of a higher level of residential content is not inconsistent with existing provisions within the Plan. For instance, the current CDP/Draft CDP already allows for consideration of up to 75% Residential Lands for CI lands in Salthill. Given the locational advantages of the subject site, including its infill and brownfield characteristics, located alongside commercial uses and adjacent to a high frequency public transport corridor, it would follow that the subject lands should be added to the list of “Regeneration and Opportunity Sites”.</p>	<p>long and narrow site which does not lend itself to redevelopment of a nature and scale expected on the Regeneration and Opportunity Sites.</p> <p>With regard to the request to allow for up to 100% Residential Content on the site, it is considered that the characteristics of the site and adjoining context does not lend itself to a residential density that would be permissible utilizing a CI plot ratio of 1.2. The CI zoning allows for an element of residential use to support sustainable neighbourhoods and mixed use developments and this is considered appropriate in this case.</p> <p>As the submission is requesting residential use for the entirety of the site, the more appropriate request should be for residential zoning on all the site.</p>
GLWC-C2-107 B. Fitzgerald	<p>Amend Urban Density and Building Height Study to include former Oasis Nightclub Site. Salthill</p> <p>It is requested that the proposed “Building Heights Strategy” should specifically include for the consideration of increased building heights at the subject site.</p> <p>We would submit that the consideration of increased building heights at this location, is supported by National policy. In this regard, we refer to the provisions of the NPF and the Ministerial “Building Heights Guidelines.”</p>	<p>CE Response</p> <p>With regard to the Urban Density and Building Height Study, it used a structured evidenced based methodology to arrive at a selection of sites for suitability for height. This site was not one of the sites selected. This study is a standalone completed document which was prepared to inform the draft plan.</p>
GLWC-C2-116 Tommy O' Brien	<p>Include Site at Wellpark Rd as a Regeneration and Opportunity Site</p> <p>Include the subject lands as a “Regeneration & Opportunity Site”-Given the locational advantages of the subject site, including its infill and brownfield characteristics, its location alongside employment and educational uses and adjacent to a high frequency public transport corridor, it would follow that</p>	<p>CE Response</p> <p>The site is not deemed to justify Regeneration and Opportunity Sites designation. It has the benefit of planning permission which demonstrated its capacity without needing a regeneration policy. A number of specific sites have been identified in the Core Strategy as having a capacity to accommodate growth, within the plan period and into the longer term. These were considered by virtue of meeting a range of criteria including that they can support a compact sustainable form and have potential for</p>

	<p>the subject lands should be added to the list of “Regeneration and Opportunity Sites”.</p> <p>Amend the “Urban Density and Building Heights Study” to consider increased building heights at the subject lands.</p>	<p>transformative redevelopment. It is considered that this small site does not have the characteristics of a Regeneration and Opportunity Site. The site has the benefit of an existing planning permission for a significant scale of development.</p> <p>With regard to the Urban Density and Building Height Study, it used a structured evidenced based methodology to arrive at a selection of sites for suitability for height. This site was not one of the sites selected. This study is a standalone completed document which was prepared to inform the draft plan.</p>
GLWC-C2-183 Mavenbrook Ltd	<p>Identify Site as a Regeneration Site</p> <p>We consider that there would likely be a shortfall of available development land in the city to accommodate the requirements for the Development Plan in terms of addressing the population targets for the city in the short and medium to long term. A particular element of such shortfall relates to the apparent assumption that all Regeneration and Opportunity Sites would be counted in terms of delivery of housing during the lifetime of the forthcoming plan.</p> <p>Many of the sites are also zoned for Enterprise, Light Industry & Commercial (CI) use, rather than residential use, and where the Commercial/Industrial limits residential use to that “of a scale that would not unduly interfere with the primary use of the land for CI purposes”. A number of the ‘Regeneration and Opportunities Sites’ would therefore clearly interfere with the primary use of the land for CI purposes delimiting considerably the residential / housing yield thereon.</p> <p>We submit that the contribution of the current Regeneration & Opportunity Sites will be limited, and a changed approach is appropriate, including the designation of the subject site for Institutional and Community (CF), replacing the existing zoning of RA – Recreational and Amenity Areas, and also that it be identified as a Regeneration Site.</p>	<p>CE Response</p> <p>This response should be read in conjunction with Chapter 11 response to zoning.</p> <p>It is not recommended that these lands should be designated as a Regeneration site. The lands in question are wholly within Flood Zone A. The development type proposed would constitute a highly vulnerable use accommodating housing for the elderly. This would be a highly incompatible use within this flood zone and would be contrary to section 28 guidelines namely the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009). Following the sequential approach means these lands should be retained for the water compatible ‘Recreation and Amenity’ that is included in the Draft Development Plan.</p> <p>Notwithstanding the flood risk associated with these lands, this site is not considered suitable as a regeneration site and sufficient lands have been identified to cater for future population in accordance with the Core Strategy.</p> <p>It is also considered that such a proposal may have an impact on the traffic carrying capacity of the Headford Road.</p> <p>These lands are a considerable resource for the city in terms of passive recreation and amenity and have significant attributes in terms of climate action supporting carbon sequestration and extensive biodiversity.</p>

	<p>The identification of the site as a Regeneration Site, with a development brief based on the delivery of 'housing with care continuum' and complementary healthcare scheme would provide clarity and assurance to the Planning Authority and the community in terms of the scope of development under consideration for the site, and would deliver actual planning gain in the form of necessary community uses in lieu of an absent and unnecessary recreational function.</p>	<p>In consultation with the Recreation and Amenity Section and the Biodiversity Officer, it is their advice that this RA zoning should be retained due to the expanding population in the area, stating that existing amenities and green spaces are under considerable pressure. They state that this area has potential to function for a number of uses including active and passive recreation, urban farming (allotments, community garden, orchard), pocket forest (climate action) and creation of wildlife corridors to proximal designated sites in accordance with Article 10 of the Habitats Directive. It is also noted that the Greenspace Strategy will consider the needs for recreation and amenity land within the city where the optimum use of these lands could include for private recreation uses.</p>
GLWC-C2-227 Brendan Mulligan	<p>LAP Commitment for Significant Regeneration and Opportunity Sites</p> <p>Galway City Council should commit to preparing statutory Local Area Plans for significant regeneration and opportunity sites where major development is anticipated in accordance with the Guidelines for Local Authorities, 2013. A relevant extract from the guidelines follows:</p> <p>Local Area Plans - Guidelines for Planning Authorities, 2013 is referenced:</p> <p><i>"The decision as to whether to prepare a local area plan in a sub-threshold context or include specific objectives in a development plan is a matter for the planning authority. However, such a decision would normally take on board criteria such as the degree to which major development is anticipated such as to justify the preparation of a standalone local area plan, the resource implications and the need to focus resources in using the local area plan process for areas where major alterations to the built environment are anticipated.</i></p> <p>Some non-statutory studies or frameworks are prepared by local authorities to give guidance on specific development</p>	<p>CE Response</p> <p>It is not considered appropriate to prepare local area plans for all significant Regeneration and Opportunity Sites in the city. The inclusion of a requirement in the draft plan to prepare masterplans, frameworks plans or spatial frameworks is to ensure that redevelopment proposals are considered in a holistic and integrated manner at the very earliest stage of planning and urban design.</p> <p>The inclusion of these requirements is over and above the standard development management required documents. It is considered a positive requirement in that it puts an onus on the applicant to consider all aspects of urban design, placemaking and traffic impact in a comprehensive manner. For larger sites, it facilitates how phasing proposals can be accommodated into design. The draft plan approach to development is a plan led approach supported by the strategic Core Strategy, environmental assessments and development management guidelines and standards.</p> <p>It should be noted that it is current practice in many local authorities to reduce the number of LAPs and many existing LAPs on expiry have been subsumed into statutory development plan. The Draft Development Plan Guidelines (2021) state that rather than having a commitment to produce a large number of LAPs that planning authorities should examine if appropriate objectives and policies can be included in the development</p>

	<p>proposals working within the relevant development plan or local area plan parameters. As long as such documents work within defined policy and objective parameters of the relevant plan and do not set new policies or objectives outside the statutory process for defining such content, their usage is both appropriate and complementary to the preparation of statutory local area plans." (emphasis has been added)</p> <p>There should be specific timelines set out in the GCDP 2023-2029 in relation to the preparation of LAPs.</p>	<p>plan which would be sufficient to provide a planning framework for development.</p> <p>In relation to timelines it is recommended that text is included to state that the preparation of the Headford road LAP will be carried out within the period of the development plan.</p> <p>CE Recommendation</p> <p>Amend section 10.27 Specific Objectives – insert text in green as follows:</p> <p>Prepare a Local Area Plan for the Headford Road area (south of the Bodkin junction) within the period of the plan.</p>
GLWC-C2-154 HKR Architects	<p>Back Land Sites - Development Potential- Eglinton St</p> <p>There are some significant back land sites that are not identified within the plan including the back lands to the rear of the An Post building on Eglinton Street. Back land sites should be clearly identified in the plan and be open for consideration for greater height and density. They could be developed to a higher density with no detrimental impact to the character of the Architectural Conservation Area.</p> <p>A capacity study is attached to the submission for back land sites between Abbeygate Street Upper, Eglinton Street, William Street and Mary Street. The scheme as drawn affords a great opportunity to create a new street through the site.</p>	<p>CE Response</p> <p>No change to the draft plan is recommended. It is not deemed necessary to specifically identify significant back land sites over any other significant site. A specific consideration for greater height and density on backland sites is not appropriate as there may be particular locational or contextual reasons or other issues which would militate against a greater height and density.</p> <p>With regard to back lands to the rear of the An Post building on Eglinton Street. These lands are located within the city centre and zoned for CC use. The draft plan includes detailed policy and guidance regarding the city centre including to inform any future redevelopment of these CC lands. Any redevelopment proposal would be required to include an assessment of the impact on the ACA and the historic core and contextual location.</p>
GLWC-C2-72 Land Development Agency	<p>Amendments to policy 10.2 Strategic Regeneration and Opportunity Sites</p> <p>The LDA welcomes the designation of Regeneration and opportunity sites and suggests an amendments to policy 10.2 Strategic Regeneration and Opportunity Sites to include explicit reference to publicly owned lands in cooperation with the LDA and relevant stakeholders.</p>	<p>CE Response</p> <p>It is not considered appropriate to give specific reference to the publicly owned lands, the LDA and relevant stakeholders in Policy 10.2 which relates to all Regeneration and Opportunity Sites, many of which are privately owned and in single ownership and is much broader policy context than just public lands. The LDA are not the only stakeholders or agency involved in regeneration within the city center. Policy 3.1 Housing Strategy includes to work in collaboration with the Land Development Agency to enhance delivery of the long term strategic needs for social, affordable and</p>

		cost rental housing in the city and a wording amendment is proposed to add that the delivery of social and affordable housing on public lands will be a priority (See CE Report in relation to Chapter 3).
GLWC-C2-123 Owen Hanley	<p>Comments on LDA Submission-Concerns with proposed text amendments</p> <p>Their submission rightfully places housing and housing delivery at the centre of the Draft City Development Plan and their commitment to that is to be commended.</p> <p>Agree with their view that prioritisation of development of public land should start centrally (i.e. Dyke Road, Sandy Road and the Harbour Lands) reflecting that services and communities are already in place in these locations.</p> <p>Submission urges more caution in relation to the potential hierarchical position some of the recommendations by the LDA would create. While more emphasis on the role of the LDA is logical, and more importantly the need to deliver social, affordable and cost rental housing should be central, the LDA should not be as ubiquitous within the Plan as is being recommended.</p> <p>The LDA's submission has a welcome focus that is public housing on public land with additional supports elsewhere. If any significant recommendations by the LDA are taken on board, they should come with strong reiterations of that key point, as was the expressed will of Elected Members in January 2022 on Housing Strategy 3.1.5.</p> <p>1.4.10 (page 10 of their submission) Require the preparation of Local Area Plans, Masterplans and Spatial Frameworks for those areas which are experiencing and/or likely to experience large scale development or regeneration, subject to agreement of the Planning Authority.</p>	<p>CE Response</p> <p>This submission is noted and reflected in responses to the LDA submission and amendments arising from that submission.</p>

	<p>3.6.5 (page 22 of their submission)</p> <p><i>Require the preparation of masterplans and spatial frame works to inform development proposals for key regeneration and opportunity sites, subject to the agreement of the Planning Authority</i></p> <p>It would be my concern that their recommendations here with the text in bold would make it a discretionary feature to require local area plans, masterplans or spatial frameworks for these crucial developments. This would in my view contribute to development led planning as opposed to a cohesive approach to sustainable development, which is the underlining purpose of creating a City Development Plan. I would recommend the Council not make these amendments.</p>	
GLWC-C2-156 Lidl Ireland GMBH	<p>Regeneration and Opportunity Site Classification & Mapping</p> <p>We consider that clarity is required in relation to the numbering and mapping of same, as the Draft Development Plan map is somewhat unclear with the outline of the sites being similar to other outlines (i.e. a black line) such as the N6 road corridor, etc.</p> <p>A specific 'Regeneration and Opportunity Sites' map should be prepared in our opinion, with each site numbered. The Draft Plan (text) refers to 20 no. sites however Sections 10.5-10.22 appear to include only 18 no. sites, with some being grouped, etc. Other sites are mapped but do not appear to discussed in detail (e.g. Eyre Square East), whilst other sites are not clearly designated as 'Regeneration and Opportunity Sites', e.g. the City Centre in general and Nun's Island (referred to as a Masterplan Area).</p>	<p>CE Response</p> <p>It is considered that the mapping associated with the Regeneration and Opportunity Sites is appropriate. The sites are identified on the Land Use Zoning and Specific Objectives map. This map includes text that the map should be read in conjunction with the written statement. Individual mapping of each site is set out in Chapter 10 accompanied by appropriate text.</p> <p>It is considered that the 'Regeneration and Opportunities Sites' are largely compatible with the CI land use objective. Permitted schemes on similar sites zoned CI have achieved mixed use developments including residential and were not deemed to contravene the zoning objective. The ambition of these regeneration an opportunity sites is to achieve regeneration and transformation as primarily mixed use sites which could include for retail of an appropriate scale. The delivery of a mix of uses will contribute to the principles of compact growth and support the 15 minute city concept. It will also support reduced travel distances and car dependency thereby supporting climate action and a reduced carbon footprint in the city.</p>

<p>In broad terms, Lidl consider that the retail potential of many of these sites has not been sufficiently considered or facilitated in the site appraisals.</p> <p>A number of the 'Regeneration and Opportunities Sites' would wholly and detrimentally interfere with the primary use of the land for CI purposes.</p> <p>There is also a disconnect in terms of the individual objectives / narratives under Sections 10.5-10.22 and the 'strategic' overview of the 'Regeneration and Opportunities Sites' designations.</p> <p>The Development Plan appears to prioritises these areas for residential, employment and retail uses, however we submit that due to the restrictions and descriptions under Sections 10.5-10.22 and the C/I zoning objectives, the ability of these sites to achieve the strategic residential and retail functions is significantly undermined</p> <p>'Regeneration and Opportunities Sites' should be reconsidered and reclassified so that retail use thereon, e.g. of a type and of a scale appropriate to the function and character of the area is at all times is allowable or open for consideration, subject to normal planning considerations.</p>	<p>Amendments in Chapter 11 to zoning objective tables will provide for greater clarity and assurance in relation to Regeneration and Opportunity Sites.</p>
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10.4 - City Centre Regeneration

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-150 Angela Casey	<p>Munster Ave & Fr. Griffin- Should be included in Figure 10.1</p> <p>The extent of the city centre as shown in Fig 10.1 differs from that shown in Galway City Draft Development Plan 2023-2029 Map B City Centre Map. Munster Avenue and Fr Burke Park should be included in Figure 10.1, as these areas are as much part of the city centre as the areas of Henry Street, Woodquay and Prospect Hill which are</p>	<p>CE Response</p> <p>Fig 10.1 is based on the different neighbourhood areas of the city while Map B is a scaled up extract of the overall city map in order to give definition to the wider city centre area.</p>

GLWC-C2-184 Valerie Walsh	<p>included. Munster Avenue and Fr Burke Park adjoin the existing CC zoning, as do the Henry Street, Wood Quay and Prospect Hill residential areas. Because Munster Avenue and Fr Burke Park are not included in Figure 10.1, these areas will not benefit from the proposals set out in Policy 10.1 of the plan I am asking that this omission is rectified and Munster Avenue and Fr Burke Park are included in the city centre map of figure 10.1</p> <p>At section 10.4 the existing vacant and redevelopment sites to the north-east end of Munster Avenue, which are zoned CC, should be identified as a regeneration site similar to the one at the site of the former Connaught Laundry, as set out in section 10.19 of the draft Plan. Specific provisions for low density development for this area, and protection of residential amenities, should be included in the development provisions for this regeneration site. The area of this site encompasses the Blue Teapot buildings far as the terrace of 5 houses, and then the former Dooley Engineering yard.</p>	<p>In terms of the neighbourhoods that fig 10.1 is based on, Munster Avenue straddles the inner residential area and the city centre neighbourhoods. Part of the street is included in the city centre which is the section which is zoned for CC use. The remainder of the street which has a residential zoning is within the inner residential area.</p> <p>It is not recommended that the city centre be expanded to include Munster Avenue and Fr Burke Park. They are more appropriately located within the inner residential zone.</p> <p>It is considered that the policies set out in Chapter 3 in relation to the inner residential areas and the city centre residential neighbourhoods are both applicable to Munster Avenue.</p> <p>A number of Regeneration and Opportunity Sites have been identified in the Core Strategy, in accordance with the NPF National Strategic Outcome NSO1 Compact Growth, as having a capacity to accommodate growth, within the plan period and into the longer term. A range of sites were considered in the city and those designated were chosen by virtue of meeting a range of criteria including that they can support a compact sustainable form and have potential for transformative redevelopment. It is considered that the site proposed does not have the characteristics of a Regeneration and Opportunity Site. Low density development would not be a characteristic of these sites.</p>
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10.6 - Inner Harbour Regeneration Site		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-121 Galway Harbour Company	Amendment to Wording in Section 10.6 Submission welcomes the identification of the potential for significant redevelopment of the Inner Harbour Regeneration site. Section 10.6 requires that "a Masterplan will be prepared for the overall site". It is	CE Response It is considered that a masterplan is a requirement for the entire lands and that within that a phasing strategy could be developed. This is necessary to ensure that redevelopment proposals are

<p>envisaged that the site will be built out in two phases and should require a separate masterplan for each phase, in the context of the overall planning framework. It is respectfully requested that the wording for this requirement is amended to allow for this flexibility.</p> <p>Bullet point 1 requires “compliance with the development plan and city council plans and strategies including the Galway Transport Strategy, Public Realm Strategy, Urban Density and Building Height Study, Heritage Plan, Biodiversity Action Plan and any future plans and strategies such as the Greenspace Strategy and Retail Strategy and emerging new LECP.” It is requested that the word “Compliance” is replaced with “have regard to” which will allow for greater flexibility for future development.</p> <p>Bullet point 18 “includes for a maximum plot ratio for CC zones of 2:1”. This Plot Ratio is considered low and not in line with principles of sustainable development. The ultimate plot ratio for the future development of the Inner Harbour Regeneration Site is likely to be well above this. It is, therefore, requested that this plot ratio is revisited to ensure that the new plan provides the framework for the sustainable long term development of this area.</p> <p>Bullet point 19 requires the provision of an “arts/cultural facility at the developer’s expense and with a management regime incorporated into the development delivery that enables the long term sustainable use of such a facility”. Galway Harbour Company are entirely supportive of the provision of arts and cultural facilities on their lands as part of the regeneration of the area and will actively accommodate such facilities. However, the requirement as set out in the draft plan is considered to be unduly onerous particularly as our client has no involvement in or expertise in this sector. The Galway Harbour Company will make a site available for an arts/cultural facility and will work with all relevant parties to ensure that this facility is delivered and that it is sustainable in the long term. We respectfully request that this requirement is reworded along the following lines: “Provision will be made within the Masterplan for an arts/cultural facility and the delivery and management regime for this facility will be devised in</p>	<p>considered in a comprehensive and integrated manner linked with services and infrastructure including traffic and transport demands and implications.</p> <p>With regard to compliance with Galway City plans and strategies, it is considered reasonable that future development proposals adheres to the strategic needs that these documents have identified for the city in accordance with the NPF and RSES.</p> <p>In relation to plot ratio the draft plan states in relation to the Inner Harbour lands to include for a maximum plot ratio for CC zones of 2:1. <i>Consideration for a higher plot ratio will be given to development proposals in excess of the normally permissible plot ratio where such proposals would contribute to sustainability, architectural quality, urban design, public realm, delivery of housing and make a significant contribution to urban character. This excess will be interpreted as a proportional increase only and will be assessed on performance based outcomes and general standards.</i></p> <p>It is considered that this wording enables increases to be achieved. Amendments to Chapter 11 in relation to residential guidelines and urban building height should also be noted (See CE report in relation to Chapter 11).</p> <p>In relation to the provision an arts/cultural facility at the developer’s expense and with a management regime incorporated into the development delivery that enables the long term sustainable use of such a facility. It is considered acceptable to amend this requirement.</p> <p>CE Recommendation:</p> <p>Amend Section 10.6 Inner Harbour Regeneration Site- text inserted in green and text removed by strikeout as follows:</p> <p>Include for the provision of an arts/cultural facility at the developer’s expense and with a management regime incorporated into the development delivery that enables the long term sustainable use of</p>
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	collaboration with Galway City Council and other relevant stakeholders”	such a facility. A delivery and management regime that enables the long term sustainable use of such a facility will be devised in collaboration with Galway City Council and other relevant stakeholders.
GLWC-C2-190 An Taisce - Galway Planning Committee	<p>Port Expansion Development Comments</p> <p>The opening comments acknowledge that “constraints associated with the existing docks require that in order to modernise and address deficiencies, the harbour functions will need to be relocated to an alternative site.</p> <p>Port expansion plans should be replaced by a Floating Dock Berth complete with new Dock Gates to be built on the lands available at the Harbour Enterprise Park.</p> <p>A similar proposal was first permitted under PI Ref, No 08-283. The use of the dock and adjacent storage yard will primarily be used to facilitate the relocation of the current scrap steel berth the current coal berth and all other timber/steel and waste materials storage and movements from the inner-docks to the new dock site, as was permitted under PI Ref. No 08/283.</p> <p>This will also allow for the existing Inner-Docks to be further developed for proposed marine, leisure and residential developments such as would be promoted in the drawing up of a new ‘Vision Plan.’</p> <p>That Vision Plan will be commissioned by Galway City Council, which are now the single shareholders in the revised Galway Harbour Company! The new Vision Plans would be integrated into and form part of the Local Area Plan originally as advised by the DoE in 2006. The above proposed development would also allow for the removal of the existing fuel discharging berth at the Inner – Docks to a new location safely away from the city centre Bonham Quay, as well as all new residential development being proposed at the Inner-Docks.</p>	<p>CE Response</p> <p>These comments are noted. Section 10.6 of the draft plan outlines the vision for the inner Harbour area.</p>

10.7 - Headford Road Regeneration Sites		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-38 Transport Infrastructure Ireland	TII- Headford Road consultation TII would welcome consultation in preparation of the Local Area Plans, especially Headford under LAP 10.7 in particular for the Headford Road Regeneration Sites.	CE Response This is noted. The preparation of LAPs will include for consultation with all prescribed bodies and stakeholders as required already under statute.

10.8 - Sandy Road Regeneration Site		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-80 Conor Dowd	LDA Modify Section 10.3 and all references to LDA sites in the Draft Plan. 'This site is a Land Development Agency national priority site for delivery of housing to include for affordable options with some commercial use' 'This site is public land but has fallen into an LDA landbank category. It may be used to deliver social and affordable housing exclusively'.	CE Response This submission is noted, the existing wording in the draft plan is appropriate to reflect the ambition to deliver mixed uses supporting sustainable neighbourhoods, reduced car dependency and the 15 minute city concept on sites in conjunction with the LDA.

10.9 - Nun's Island Masterplan Area		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-132 NUI Galway	Amend Nun's Island Masterplan area Figure 10.7 'Nun's Island Masterplan Area' NUI Galway submission requests that further consideration is given to amending Figure 10.7 to include the Bish School grounds and the adjacent NUI Galway Education Building in the area identified as the	CE Response Figure 10.7 includes the NUI Galway Education Building in the area identified as the 'Nun's Island Masterplan Area'. It reflects the extent of NUIG properties and CF zoned lands at this location which does not include the Bish school site.

	<p>'Nun's Island Masterplan Area', to align with the work completed to date on NUI Galway's Nun's Island Masterplan.</p>	<p>This will not inhibit the proposals emerging on these lands that can contribute to the general ambitions for regeneration in this area.</p>
GLWC-C2-199 Shauna Spillane	<p>Biodiversity Importance</p> <p>Chapter 10 neglects the importance of biodiversity on Nuns Island. This is an area which is the first link to city centre area which is completely surrounded (bordered) by a green belt (i.e., birds, insects, fish and plants) – this needs to be emphasised more in the masterplan and should be the main theme driving the future plans for Nuns Island. In other words, the integration of biodiversity, tranquillity and water as theme for the area would provide a “re-set” from the bustle of shop street. Perhaps a micro version of Valencia’s green river park.</p>	<p>CE Response</p> <p>Chapter 10 requires that any development on these lands will require a Masterplan which is required to be prepared in accordance with guidance set out in Chapter 8. This guidance includes a range of principles to achieve good urban design. One of the key principles is Environmental Responsibility and Climate Resilience which includes for the enhancing biodiversity. It also provides for the greening measures through the use of innovative design features in buildings such as green roofs and walls.</p> <p>CE Recommendation</p> <p>An amendment to Section 10.9 Nuns' Island Masterplan Area is recommended - insert text in green as follows:</p> <ul style="list-style-type: none"> Include measures to enhance amenity, biodiversity and open space, consider sustainable recreation opportunities and include for increased public access to the waterways. It will also be required to demonstrate a sensitive approach to the high quality waterways environment.
GLWC-C2-199 Shauna Spillane	<p>Open Spaces in Nun's Island</p> <p>Nuns Island is the closest match to an area which green and blue infrastructure meet and this needs to be reflected in section 10.9 Nuns Island Masterplan Area.</p> <p>Submission states that the plan discusses the regeneration of the area in the context of building new development or repairing old fabrics but does not emphasise enough the importance of leaving these open spaces open.</p> <p>The masterplan should designate these areas has “open amenity spaces” with the justification that once these areas are built/developed on, they will never become “open” and used for outdoor amenity again. In</p>	<p>CE Response</p> <p>The detailed requirements for the preparation of a masterplan set out in section 10.9 and Chapter 8 will inform the masterplan in terms of open space provision. Section 10. 9 states to:</p> <p><i>Include measures to enhance amenity and open space, consider sustainable recreation opportunities and include for increased public access to the waterways. It will also be required to demonstrate a sensitive approach to the high quality waterways environment.</i></p>

	<p>other words, once development occurs on sites its very rare that this will be undone. This is in the interest of designating the final valuable open spaces around Galway City centre as green spaces so the city can enjoy these pocket parks in the future.</p>	<p><i>Consider the existing character and context of the area and demonstrate how redevelopment will contribute to aspects of urban design.</i></p> <p><i>Demonstrate how the development will protect the community and natural value of the waterways through ensuring development retains a sufficient set back and buffer from this sensitive environment and that any development is of an appropriate scale and design to address this unique setting</i></p> <p><i>Include for an open space typology and consider the potential for creation of a new urban space and public realm.</i></p>
GLWC-C2-199 Shauna Spillane	<p>Regeneration Potential Nun's island</p> <p>The decision making process for the future of Nuns Island and the development of the masterplan narrative to one stakeholder on the Island (NUIG) is too narrow a focus, there are many different groups, community and others who would like to help create a shared vision for the Island.</p> <p>As a resident who is keen to participate in and contribute to the vision for Nuns Island, my voice will not be heard if such narrative continues.</p> <p>Chapter 10 states— “It supports a high-quality environment and historic core and hosts a strong arts and cultural heritage” additionally, Policy 10.1 Point 14 states “Support a diversity of uses in the city centre public realm including markets, outdoor seating and dining, arts and culture events to add to the vitality and vibrancy of the city” – In keeping with these objectives there are many underutilised buildings on the island which most would agree need regeneration. Could there be provision given for these to be turned into spaces to connect people and the arts.</p> <p>Submission sets out a range of potential uses in this area.</p>	<p>CE Response</p> <p>Section 10. 9 includes a requirement to Include for community engagement in the preparation of the plan and an audit of benefits for the local community.</p> <p>The masterplan will inform the optimum future uses of the existing underutilized buildings. Section 10. 9 includes to examine a range of uses which would be appropriate for this area supporting enterprise, innovation, education, tourism and community.</p> <p>Redevelopment and/or change of uses will facilitate public engagement also.</p>
GLWC-C2-199 Shauna Spillane	<p>Development at Nun's Island and Masterplan Text</p> <p>The Masterplan should outline clearly what is meant by "Demonstrate how the development will protect the community and natural value of the</p>	<p>CE Response</p>

	<p>waterways through ensuring development retains a sufficient set back and buffer from this sensitive environment and that any development is of an appropriate scale and design to address this unique setting"</p> <p>Submission refers to recent planning permissions where it is considered that this was not adhered to. In the context of recent permissions, reference is also made to section 3.7 in relation to infill development.</p>	<p>Noted the masterplan will be required to address the sensitive environment of the waterways as stated.</p> <p>Comments are noted.</p> <p>The masterplan will be required to demonstrate how development will protect the community and natural value of the waterways through ensuring development retains a sufficient set back and buffer from this sensitive environment and that any development is of an appropriate scale and design to address this unique setting" e issues include for these issues</p>
GLWC-C2-170 Nuns' Island Residents' Association	<p>Any Masterplan created regarding Nuns Island should first and foremost take meaningful account of Nuns' Island's historical character and its residents. NUIG should be treated as any other developer rather than being given preferential treatment and funding.</p> <p>The protection of the heritage of Galway City Centre should be a priority of any City Development Plan</p> <p>Any future development within the city should be in keeping with the unique mediaeval townscape, protect its waterways and seek to enhance them.</p>	<p>CE Response</p> <p>Noted the masterplan will be required to address the historical character of the area. A requirement set out in section 10.9 is to include for community engagement in the preparation of the plan and an audit of benefits for the local community. Any consequent proposals that require planning consent will also offer an option for public engagement.</p> <p>The policy approach of the plan in particular in Chapter 5, 8, 10 and 11 is to ensure that future development protects and enhances all aspects of heritage and environment.</p>
10.11 - Crown Square Regeneration Site		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-181 Eir	Extend the Specific Objective – 'Regeneration and Opportunity Site' (Crown Square) to include the subject site (approximately 1.1ha in extent) Monivea Road, Mervue	<p>CE Response</p> <p>This response should be read in conjunction with response in Chapter 11. It is not recommended to include this portion of the</p>

	<p>Amend text under Section 10.11 to reflect this designation and require preparation of a masterplan for the Eircom site.</p>	<p>Eircom site as an extension of the existing Crown Regeneration and Opportunity Site.</p> <p>While it is stated that these are deemed surplus lands, it is considered premature from a planning viewpoint to siphon off this portion of land and includes as a regeneration site where the balance of the site still retains an industrial character which may not be compatible with proposed uses which could be supported under the CI zoning/Regeneration site designation.</p> <p>A blend of new residential development while retaining the existing industrial use and poor quality office development would be contrary to the policies in the plan to develop high quality good design and attractive sustainable development.</p> <p>Consideration of a potential change of use of the existing office buildings would not comply with modern residential and amenity standards and necessary environmental sustainable specifications.</p> <p>The nature of the existing structure does not lend itself to be compatible with a change of use or appropriate for modern residential use. The quality of the surrounding amenity would not lend itself to a sustainable residential development.</p> <p>For the currency of the Development Plan 2023-2029, it is considered that the existing Crown Regeneration Site can accommodate a significant development to align with the Core Strategy for the currency of the development plan.</p>
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10.12 - Corrib Great Southern Regeneration Site

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-22 John & Maria Rabbitte	<p>Comments on Corrib Great Southern Regeneration Site relating to use</p> <p>A suitable use for site would be a retirement village for those in their retiring years to trade down from present homes. This use would reduce</p>	<p>CE Response</p> <p>This is noted. There is a requirement in section 10.12 for a minimum of 50% of the potential gross floor area to be reserved for residential use. The masterplan will consider the optimum uses for</p>

	<p>traffic flow as it is well serviced by bus routes, would create a comfortable environment for elderly care and would free up homes.</p>	<p>the site which can include for housing for older persons where amenity requirements in Chapter 11 are a consideration.</p> <p>Policy set out Policy 3.1 Housing Strategy adds support to this submission in particular, No. 9 <i>Support the specific housing needs of older people including independent living options as well as semi-independent living options and nursing home accommodation. These facilities should be preferably accommodated within established neighbourhoods and at locations that have good access to community facilities and amenities;</i> and No. 10. <i>Enable older people to continue to live in their own homes, through adaption where necessary or a home more suitable to their needs through rightsizing.</i></p>
GLWC-C2-95 Trigo Property Co. Ltd & Welcorrib Ltd.	<p>Amend Specific Development Objective for Regeneration Site</p> <p>Submission welcomes the identification of the Corrib Great Southern Site as a Regeneration Site and the aspiration of the site-specific development objective set out in Section 10.12 of the Draft Galway City Development Plan.</p> <p>It is noted that additional uses may be appropriate in line with the 'CI' zoning objective on the subject lands.</p> <p>Clarity is required with reference to 'neighbourhood facilities' in the development objective.</p> <p>Submission requests that the specific development objective for the site is amended to state that the site may be suitable for the provision of a new Neighbourhood Centre to serve the surrounding area subject to the provisions of the Retail Planning Guidelines 2012.</p> <p>Taking the location and extent of the existing (and proposed) neighbourhood and district centres on the eastern side of the City into consideration, there is significant gap in provision between Mervue and Doughiska/Roscam/Briarhill to the east.</p>	<p>CE Response</p> <p>This submission is noted and no change is recommended.</p> <p>Section 10.12 Corrib Great Southern Regeneration Site states that ...<i>a greater proportion of the floor area space can be dedicated for residential purposes where the site supports a range of neighbourhood facilities...Neighbourhood facilities</i>' in this context is a broad range of facilities that one would expect to serve the development and the wider neighbourhood such as recreation, health, education and service facilities.</p> <p>It is considered premature at this stage to designate this site as a neighbourhood centre in accordance with the Section 28 Retail Planning Guidelines 2012.</p> <p>Policy 6.11 Retail Strategy requires to review the strategies and policies for retailing following the preparation of a joint retail study with Galway County Council, to ensure sufficient policy support to create a positive framework for continued vitality and investment in the main retail areas especially the Galway MASP and to ensure an informed and consistent approach to policies relating to shared retailing activities in line with national policy. This is envisaged to commence in 2022/2023 when the retail sector reverts to more</p>

	<p>Given the location of the subject site it is considered to comprise a prime location for the provision of a new Neighbourhood Centre.</p> <p>This would comply with Section 6.5 policy to support the provision of new neighbourhood centres where there is a deficit of existing services. Submission states, that in a spatial context, there is a significant gap in provision in the vicinity of the subject site.</p> <p>This would also comply with Section 2.4 in respect of Climate Change. The policy states that, in respect of retail development, it is an aspiration of the City Council to: 'Facilitate the development of vibrant District, Neighbourhood and Local Centres with a range of retail, community and leisure services to reduce travel demand and support "15-minute neighbourhood (city) concept.'</p> <p>To ensure ease of access to local/neighbourhood centres, such centres should be distributed in such a way as to be accessible via a 15-minute walk, cycle or by public transport.</p>	<p>normal market conditions after the lifting of all Covid 19 pandemic restrictions and the ending of government supports. This will afford a robust understanding of the needs and quality of future retail floor space requirements.</p>
GLWC-C2-156 Lidl Ireland GMBH	<p>Neighbourhood Centre Scale Retail Provisions</p> <p>In relation to the substantial brownfield opportunity at the former Corrib Great Southern Hotel site, the omission of the existing caveat under the current development Plan that "retail shall be restricted to bulky goods retailing and local retailing needs" is noted. This presumably facilitates the development of the site for a meaningful retail element, which should in our opinion deliver up to and including a Neighbourhood Centre scale, given the substantial resident catchment in close proximity, and also the significant trip generators in close proximity including GMIT, which would facilitate linked trips, many by sustainable means.</p> <p>Submission notes the continued absence of a strictly formal Neighbourhood Centre designation, e.g. in the form of a specific zoning or mapped set of objectives. In this regard we reiterate that to facilitate same, Local / Neighbourhood Supermarkets e.g. up to 2,500 sqm net retail sales area, should be 'permitted in principle' or 'open for</p>	<p>CE Response</p> <p>This submission is noted.</p> <p>Section 10.12 Corrib Great Southern Regeneration Site states that ...<i>a greater proportion of the floor area space can be dedicated for residential purposes where the site supports a range of neighbourhood facilities</i>...Neighbourhood facilities in this context is a broad range of facilities that one would expect to serve the development and the wider neighbourhood such as recreation, health, education and service facilities.</p> <p>It is considered premature at this stage to designate this site as a neighbourhood centre in accordance with the Section 28 Retail Planning Guidelines 2012.</p> <p>Policy 6.11 Retail Strategy requires to review the strategies and policies for retailing following the preparation of a joint retail study with Galway County Council, to ensure sufficient policy support to</p>

	<p>'consideration' under most zoning objectives, e.g. Residential, Commercial/Industrial, etc.</p> <p>The Planning Authority should formally designate, and map, neighbourhood centres, and clarify the scale and type of retail allowable in such centres. We reiterate that the current lack of clarity and wide disparity in scale and provision is in our opinion not conducive to the proper provision of retail and allied services in the city and its residential neighbourhoods.</p>	<p>create a positive framework for continued vitality and investment in the main retail areas especially the Galway MASP and to ensure an informed and consistent approach to policies relating to shared retailing activities in line with national policy. This is envisaged to commence in 2022/2023 when the retail sector reverts to more normal market conditions after the lifting of all Covid 19 pandemic restrictions and the ending of government supports. This will afford a robust understanding of the needs for such facilities in this part of the city.</p> <p>In relation to retail up to 2,500 sqm net retail sales area, the provision of these within R and CI zoning outside of the designated retail hierarchy would be excessive and contrary to the definition of local/neighbourhood centres as provided for in the retail planning guidelines.</p>
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10.15 - Arch Motors Opportunity Site

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-155 Creaven Co-Ownership	<p>District Centre Boundary- Clearly Define Boundaries</p> <p>The subject site is considered to be functionally, if not formally, within the District Centre, however it is also potentially formally within the Centre, such is the uncertainty in the Draft Plan. The Development Plan does not provide a map or boundary of the Centre, and as such it has historically been treated as being a part of the overall Westside cluster, which the Draft Plan appears to confirm – stating for instance that Westside “has benefited from investment in recreation facilities, access upgrades including bus lanes and cycle lanes and the designation of the main access road, Seamus Quirke Road as suitable for a rapid transit bus route. This investment will be beneficial especially on the larger opportunity sites which form part of the district centre.”</p> <p>This suggests that the Arch Motors site is indeed formally a part of the District Centre. The forthcoming Development Plan should, as is a</p>	<p>CE Response</p> <p>In relation to district centre boundaries, Fig. 10.22 identifies the extent of the district centre of Westside.</p> <p>The Doughiska District Centre is defined by the CI lands at the Briarhill Shopping Centre.</p> <p>The Knocknacarra District Centre is defined by the CI lands north and south of the Western Distributor Road.</p> <p>The district centre at Ardaun is defined by the UVC lands as set out in the Ardaun LAP..</p>

	<p>requirement of the Retail Planning Guidelines, clearly define the District Centre boundaries. In doing so, we request that the site be included within these Westside District Centre boundary, based on the logical delineation of the commercially focused land in the cluster around Westside. Its exclusion would be a clear outlier in terms of the pattern of development in the area. Should the site be formally considered as being outside of the District Centre, it should be enabled to be considered for "Retail of a type and of a scale appropriate to the function and character of the area" on the basis of the sequential approach and being at the immediate edge of a District Centre, as is required by the Retail Planning Guidelines.</p> <p>The uncertainty created by undefined the local retailing needs designation frustrates the proper application of the sequential approach.</p>	<p>These are highlighted on the Core Strategy map and given definition in the text. It is recommended that a district symbol be included in the Core Strategy for Westside.</p> <p>The Arch Motors site is not within the District Centre of Westside. It hosts a small scale standalone building in a semi-vacant commercial site along the Seamus Quirke Road and is not allied to the existing District Centre which comprises significant retail/commercial sites of scale and community and amenity developments.</p>
GLWC-C2-156 Lidl Ireland GMBH	<p>Removal of Arch Motors Site from list of Regeneration and Opportunity Sites</p> <p>The site is in active use, albeit partially unused. The opportunity / regeneration designation would stymie the repurposing of the site unless and until the existing fuel station use ceases. This is not envisaged even in the long term;</p>	<p>CE Response</p> <p>It is recommended that the designation of the Arch Motors site as an opportunity site be omitted as requested. This will not impact the Core Strategy that will still retain 19 Regeneration and Opportunity Sites.</p> <p>It is considered that the CI zoning of this site will allow for consideration of redevelopments for a number of uses.</p>
GLWC-C2-155 Creaven Co- Ownership	<p>As such the site will likely be restricted from reasonable redevelopment, as has been Lidl's strategy on the site over the course of planning applications to date, with the former application being supported by the local Planning Authority;</p> <p>There would be a significant opportunity cost arising from the opportunity / regeneration designation which would effectively result in the sterilisation of the unused part of the site, which would directly undermine the principle an objective of the opportunity / regeneration designation;</p> <p>The reference to "capacity for redevelopment for a residentially led mixed use scheme" is wholly incompatible with the site context in our</p>	<p>CE Recommendation</p> <p>Omit Section 10.15 Arch Motors Opportunity Site text and map</p> <p>Omit Specific objective on the Land Use Zoning and Specific Objectives map.</p> <p>Amend text in Section 1.5.2 Settlement Capacity Audit third paragraph –text in green as follows:</p> <p>The Regeneration and Opportunities Sites which number 20 19 in total were reviewed individually. They include lands suitable for a mix of uses with capacity for residential delivery...</p>

<p>opinion, having regard to the material constraints on the site arising from proximity to the hospital complex, where a helipad is located; The preservation of the adjoining site as a location for a 24/7/365 emergency and routine landing pad is a core priority for the management of the hospital, whose interests would be vindicated by any planning process for substantial residential development on the site;</p> <p>Such development would be expected to have a relatively poor residential amenity due to significant noise and vibration and related affects, at all times of day and night, assuming that the site could be developed at all given the height restrictions necessitated (to allow for flight paths); and,</p> <p>The Lidl proposal for the site seeks to balance the constraints and opportunities of the site, ensuring a good neighbour approach to all areas, including the hospital grounds, whilst benefiting from the strategic District Centre or edge of District Centre location, availability of public transport, a walkable residential catchment, etc.</p>	
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10.16 - Shantalla Road Opportunity Site		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-198 Walter King	<p>Lands at Shantalla Road- Opportunity Site- Amendment to Site Specific Description for 0.62 Ha site</p> <p>Submission welcomes the development objectives for this site. Requests that the site-specific description for the subject lands to be altered as follows:</p> <p>This site of 0.62 hectares is located along the Shantalla Road. This site has capacity for redevelopment primarily for residential use to assimilate into the existing neighbourhood. The density of any redevelopment shall have regard to the surrounding context. <i>Appropriate density on the</i></p>	<p>CE Response</p> <p>This submission seeks an amendment to the specific objective for these lands seeking to omit the requirement that the density of any redevelopment of the site shall have regard to the surrounding context. It proposes a revised wording that the density shall be determined in accordance with the provisions of The Sustainable Urban Housing: Design Standards for New Apartments 2020.</p> <p>A change in the wording is not recommended. This is a potential residential infill site in an existing neighbourhood and any redevelopment will need to be able to assimilate into the</p>

	<p><i>subject lands shall be determined in accordance with the provisions of The Sustainable Urban Housing: Design Standards for New Apartments 2020.</i></p>	<p>neighbourhood. The designation of this site as an Opportunity Site recognises that there is capacity for more efficient use of the land at this location. However it is reasonable to retain this specific objective to have regard to the surrounding context. This wording is in accordance with the Sustainable Residential Development Guidelines 2009. The surrounding context includes its location along the Shantalla Road, along Red Lane and backing onto a public park with adjacency to an existing residential neighbourhood.</p> <p>All these contextual issues will be required to be considered as part of the proposed development which will need to accord with the requirement for a spatial framework for the site and compliance with Chapter 11 Standards and Guidelines.</p>
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10.17 - Doughiska Road Opportunity Site

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-38 Transport Infrastructure Ireland	<p>TII- Doughiska Road Opportunity Site Concerns</p> <p>TII notes serious concern that this opportunity site does not highlight that the requirements associated with national roads at this location with respect to the restriction of access to the n6 "dual carriageway" and associated junction and mitigations required for developments in close vicinity to national roads.</p> <p>Language is suggested to be included into section 10.17 to include: "with access to the Doughiska Road only" and " and appropriate mitigation associated with the proximity to the national road network" to read as follows:</p> <p>Any new proposed development on this site will require a spatial framework to be prepared with access to the Doughiska Road only. In addition to the general guidance set out in Chapter 8, the framework will also take account of the archaeological context of the site, shall</p>	<p>CE Response</p> <p>It is implicit in development plan policy to ensure that the carrying capacity, operational efficiency, safety and significant national investment being made in the national road network is protected in line with national policy.</p> <p>Policy 4.6 Road and Street Network and Accessibility, includes to support national policy and guidance with regard to protection of the National Road network including the strategic function of the TEN-T core and comprehensive network. Development objectives will be in accordance with the DOECLG Spatial Planning and National Roads Guidelines (2012).</p> <p>This protectionist policy is reflected in the extant planning history on this site which restricted development access to the Doughiska</p>

	<p>integrate with the adjoining reservation for a pedestrian/cycleway and appropriate mitigation associated with the proximity to the national road network.</p>	<p>road as part of permitted development proposals. This is similar to what has occurred for all developments in this area.</p> <p>To address the concerns of TII, an amendment to Section 10.17 Doughiska Road Opportunity Site is recommended.</p> <p>CE Recommendation</p> <p>Amend Section 10.17 Doughiska Road Opportunity Site – insert text outlined in green as follows:</p> <p>Any new proposed development on this site will require a spatial framework to be prepared. In addition to the general guidance set out in Chapter 8, the framework will also take account of the archaeological context of the site and shall also integrate with the adjoining reservation for a pedestrian/cycleway. The framework shall take account of proximity to the national road network and direct access to the national route will be prohibited.</p>
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10.21 - Knocknacarra District Centre (North) Opportunity Site

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-92 Glenveagh Living	<p>Increased Height and Density on Opportunity Site 10.21</p> <p>The Knocknacarra District Centre (North) Opportunity Site is an appropriate location for increased height and density in the context of future residential development. Section 19.2 of the Draft Urban Density & Building Heights Study states that, for the western suburbs of Ballyburke, Ballymoneen and Knocknacarra, that densities of up to 35-40 units per hectare and heights of up to 3-4 storeys are open for consideration. Submission outlines that development of this height and scale will not facilitate the beneficial development of the subject lands in accordance with Galway City Council's aspiration for an 'urban village' at this location nor would it accord with the provisions of the Design</p>	<p>CE Response</p> <p>With regard to the Urban Density and Building Height Study, it used a structured evidenced based methodology to arrive at a selection of sites for suitability for height. This site was not one of the sites selected. This study is a standalone completed document which was prepared to inform the draft plan.</p> <p>The wording set out in Section 10.21 Knocknacarra District Centre (North) Opportunity Site is deemed appropriate for the site in the context of the vision for the overall district centre lands to achieve an urban village type centre as opposed to a shopping centre only. The delivery of residential development as part of the overall mix of uses at this location at sustainable densities will contribute to the</p>

<p>Standards for New Apartments 2018 and the Urban Development and Building Height Guidelines 2018.</p> <p>It is considered that the minimum 20% residential content requirement set out in the zoning objective conflicts with the density requirements for the suburb of Knocknacarra that are discussed in the Spatial Strategy set out in the UDBHS- 40 units per hectare.</p> <p>Based on An Bord Pleanála precedent, and in the context of overarching national planning policy as set out in the National Planning Framework, the Design Standards for New Apartments 2018 and the Urban Development and Building Height Guidelines 2018, it is considered that the subject site would be an appropriate location for increased height and density which would exceed the thresholds currently set out in the Draft Urban Density & Building Heights Study.</p> <p>Proposed Amendment:</p> <p>'That the Development Guidance for the West - Knocknacarra, Ballyburke, Ballymoneen set out in Section 19.2 of the Draft Urban Density & Building Heights Study is amended to state that increased heights and densities will be open for consideration on the Knocknacarra District Centre (North) Opportunity Site subject to the proper planning and sustainable development of the area'</p> <p>On the basis of the above we are seeking an amendment to the Draft Development Plan to ensure that higher densities and increased heights can be achieved on the Knocknacarra District Centre (North) Opportunity Site.</p>	<p>principles of compact growth and support the 15 minute city concept and sustainable neighbourhood policy set out in Chapter 3. It will also support reduced travel distances and car dependency thereby supporting climate action and a reduced carbon footprint in the city. The determination of the densities and heights at this location will be based on a range of criteria such as surrounding context, visual amenity, proximity to public transport networks. The requirement to prepare a spatial framework will determine in a holistic and integrated manner the optimum regeneration proposals for these lands. The previous planning history on the site and within the district centre will also be a consideration.</p> <p>It is not considered that the approach in the draft plan prohibits development of a significant scale of residential use on these lands, which will complement the existing commercial use at this location.</p>
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10.23 - Salthill		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-208 David Howard	<p>Salthill development</p> <p>Any development should recognise Salthill as being primarily a residential area. Any additional development should first and foremost be to the benefit of existing residents and only secondly be as a benefit for tourists/visitors.</p> <p>Traffic calming measures should be installed along the Upper Salthill Road. Cars should be dissuaded from transiting through Salthill Village and be redirected to Seapoint Promenade. Additional crossing points should be provided along the Upper Salthill Road. Salthill Village should be fostered as an area suitable for people, not cars. There is more than sufficient parking in Salthill to provide for this.</p>	<p>CE Response</p> <p>Salthill is located within the established suburbs and policies are included in Chapter 3 and standards set out in Chapter 11 in relation to new development in these areas. The draft plan also recognizes that Salthill is an urban village that serves not only the resident population but is also a significant visitor destination. This requires a balanced approach and the policies in these chapters together with Chapter 10 policy seeks to achieve this.</p> <p>With regard to traffic and circulation improvements the draft plan includes Policy 10.3 to enhance the public realm of Salthill including the implementation of an environmental improvement scheme with particular focus on the main commercial street and in the vicinity of Seapoint and D'Arcy roundabout.</p> <p>It also includes policies to continue to improve the amenity recreational quality of the area though the preparation of a strategy for the long-term management and enhancement of the promenade and by the implementation of environmental and coastal improvement schemes.</p>
GLWC-C2-208 David Howard	<p>Development of Leisureland for recreational facilities for residents</p> <p>We support the development of Leisureland to provide better recreational facilities for residents.</p>	<p>CE Response</p> <p>This is noted.</p>
GLWC-C2-98 The Village Salthill	<p>Local Area Plan required for Salthill</p> <p>This plan would address flood defences with integrated cycle facilities; would include a comprehensive plan for public spaces and amenities including the promenade, leisureland, toft park and the old tourist office</p>	<p>CE Response</p> <p>It is considered that the existing policy and specific objectives in the draft plan address the issues raised and a LAP is not deemed a requirement or an appropriate planning approach. Policy 10.3 Salthill includes to:</p>

	<p>The plan would include for the village streetscape and public realm; reinstatement of the tidal pools at Ladies Beach and address outdoor dining.</p> <p>Submission requests a number of short term considerations such as an area designated for Boules; photo opportunity site, 'Sculpture Trail', Pontoon and enhanced connectivity between the village and the prom.</p> <p>City Council should upgrade Grattan Road beach to Blue Flag status also as a 'connector' to the city and an extension of the 'clean coastal area'.</p>	<p><i>3. Enhance the public realm of Salthill including the implementation of an environmental improvement scheme carried out in consultation with local businesses, residents and key stakeholders, with particular focus on the main commercial street and in the vicinity of Seapoint and D'Arcy roundabout.</i></p> <p><i>4. Continue to improve the amenity recreational quality of the area through the preparation of a strategy for the long-term management and enhancement of the promenade and by the implementation of environmental and coastal improvement schemes. This shall include for appropriate flood risk assessment and management measures.</i></p> <p><i>Prepare a strategy for the long term development and enhancement of the character of Salthill village and promenade which provides for guidelines for good urban design and the development of high quality architectural standards for new developments and redevelopments.</i></p> <p>With regard to the Coirib go Cósta Galway City Flood Relief Scheme, the consideration of multifunctional use of defences e.g. for cycleways/walkways or enhanced public realm is a consideration. With regard to defences at Salthill, modelling and wave overtopping analysis is underway and will inform draft options for the scheme which will be developed in Q4 2022.</p>
GLWC-C2-156 Lidl Ireland GMBH	<p>Should have District Centre status</p> <p>It is noted that Salthill is designated as a Neighbourhood Centre (though primarily zoned Residential and C/I), with no defined boundaries to the centre.</p> <p>Having regard to the significant role of Salthill in the City, whether in terms of recreational, entertainment, leisure or retail functions, we submit that the area should be elevated to District Centre status. Such would emphasise the important role of the area, particularly in the</p>	<p>CE Response</p> <p>This submission is noted. This would be contrary to the retail strategy.</p> <p>It is considered that the nature and existing pattern of commercial development in Salthill merits its designation as a neighbourhood centre and complements the nature of the settlement character and function. This area is not akin to a commercial district centre serving a large catchment area.</p>

	<p>context of the significant infill requirements of the National Planning Framework and the Regional Spatial and Economic Strategy.</p> <p>This will naturally result in a significant increase in the Salthill population and thus a critical mass for a District Centre designation, which should be planned for at an early stage.</p> <p>We note that the Salthill area has not been identified with any Regeneration and Opportunity Sites despite a number of sites being potentially suitable for such, not least the Leisureland site and/or adjoining lands.</p> <p>It is our opinion there is likely to be considerable unmet demand from residents, consumers / visitors and retailers alike to expand retail and non-retail services in Salthill to that of a District Centre scale, which would be a positive addition, and should be encouraged by the Planning Authority through the designation of a clearly defined District Centre area.</p> <p>The area is currently underserved in this regard despite being a well-recognised and distinct community area within the city, which will be intensified significantly in the medium to long term in the context of the National Planning Framework imperatives of densification of cities and existing built up areas.</p>	<p>Policy 6.11 Retail Strategy requires to review the strategies and policies for retailing following the preparation of a joint retail study with Galway County Council, to ensure sufficient policy support to create a positive framework for continued vitality and investment in the main retail areas especially the Galway MASP and to ensure an informed and consistent approach to policies relating to shared retailing activities in line with national policy. This is envisaged to commence in 2022/2023 when the retail sector reverts to more normal market conditions after the lifting of all Covid 19 pandemic restrictions and the ending of government supports. This will afford a robust understanding of the retail hierarchy in the city and will consider the status of Salthill within this hierarchy.</p>
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10.24 - Westside		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-235 Bernadette & James Cormican	<p>Include lands at Seamus Quirke Rd (0.67 Ha) into Westside Regeneration and Opportunity Site</p> <p>Include lands (0.67 Ha), currently zoned CI, District Centre in the Seamus Quirke Rd Regeneration to increase development potential on the site.</p>	<p>CE Response</p> <p>It is recommended that the subject site be included into section 10.10 Seamus Quirke Rd Regeneration Site. The inclusion of these additional lands which currently supports a number of robust commercial uses reflects the pattern of development at this location. It is at an advantaged location, being proximate to key facilities, along a public transport corridor and close to park facilities. It will</p>

	<p>Submission notes that if redevelopment occurs on the property, it will require an entrance off the new Seamus Quirke Rd. The Roads Dept. of the City Council have indicated that there should only be one entrances off new Seamus Quirke Road, to be shared between O'Higgins Lands and Cormicans. This should be provided for in the Plan.</p>	<p>allow for greater potential for comprehensive redevelopment at this location within the designated district centre supporting a mix of uses which will include for residential use and could include uses such as primary healthcare, commercial and office uses.</p> <p>With regard to access issues raised in the submission, it is considered that the wording of the draft plan which requires an overall Masterplan to be prepared in advance of any redevelopment is sufficient. Any masterplan will have to consider the optimal layout and appropriate access network for all modes to this regeneration area of scale.</p> <p>On review of these district centre lands and the regeneration site it is also recommended that an additional portion of land is included (0.3 Ha). This is to reflect the existing prevailing uses, the pattern of development, landownership and previous planning history on these lands.</p> <p>CE Recommendation</p> <p>Amend Section 10.10. Seamus Quirke Road Regeneration Site to extend the boundary of this site to include an additional 0.97 hectares as outlined in red on small map.</p> 
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10.25 - Ardaun LAP		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-38 Transport Infrastructure Ireland	TII- Ardaun- Public Transport Crossing N6/M6 Advises that the provision of public transport crossing the N6/M6 will require the consultation and co-ordination with stakeholders especially with regard to potential implications for the national road network in the area. The location of public transport crossing of the N6/M6 should be shown as 'indicative only' on Development Plan mapping.	CE Response This is noted. The map includes that all mapped objectives are indicative only.
GLWC-C2-222 Anita Furey	Against Urban Village Zoning at Ardaun Submission voices concerns regarding the development plan in the area concerning the east of the Galway Clinic. The area zoned urban village is adjacent to low density residential and agricultural areas. The visual impact of a high density residential /commercial zone will not be in keeping with the current natural surroundings and will impact on the visual transition between rural and urban development. There should be a gradual transition from low density to high density. Please ensure there are sufficient community amenities for people to use in this area, eg sports /athletics facilities as well as facilities for those with mobility and visual impairments.	CE Response This submission relates to lands within the Ardaun Local Area Plan 2018-2024. Because this is an adopted statutory plan there is no statutory capacity for consideration of this submission. Such consideration can only be accommodated under the auspices of the LAP review which is due in 2023.
GLWC-C2-222 Anita Furey	Impacts on Flooding and Groundwater The impact on groundwater to down gradient karst features including springs and swallow holes in the area to the south, around Rosshill, has not been considered and the impact on flooding caused by the development of the Ardaun area needs to be mitigated.	CE Response The Ardaun LAP was subject to strategic environmental assessment and included flood risk assessment which considered these issues. The LAP includes robust policy to ensure that new development will not have the suggested impact.
GLWC-C2-80 Conor Dowd	Wastewater treatment Modify Ardaun Section 10.25 to include wording in relation to water and waste water infrastructure.	CE Response This submission is noted. The wording in relation to servicing at Ardaun which is referenced in this chapter and in Chapter 9 and in the LAP is considered sufficient to address the issues raised.

GLWC-C2-69 Galway County Council	Ardaun LAP area, Briarhill and Garraun - Galway Co.Co. Galway County Council welcomes further collaboration regarding the eastern environs including Ardaun LAP area, Briarhill and Garraun and in particular the delivery of an Area based Transport Assessment for the eastern environs.	CE Response Noted. Galway City Council welcome the ongoing engagement with the County Council on MASP issues. It is noted that an Area Based Transport Assessment was carried out for Ardaun LAP in 2018 and associated measures from this assessment are currently being carried out such as the Martin roundabout works.
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10.26 - Murrough LAP

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-227 Brendan Mulligan	LAP Preparation There was a commitment to prepare a LAP for Murrough in GCDP 2005-2011. There is no timeline included in the Draft GCDP 2023-2029 to prepare a LAP for Murrough. The impression from reading the draft is that its preparation will not even commence before expiry of the period of the draft plan, 24 years after initially committing to it.	CE Response It is an objective to prepare a LAP for Murrough. While the statutory process has not commenced, work is ongoing to seek solutions to some of the challenges associated with the site. A flood risk assessment has been undertaken of the lands. There has been ongoing consultation with key stakeholders such as GMIT who are significant landowners in the area. Consultation with Irish Rail with regard to options for access have also been undertaken. A resolution to some of the challenges would enable the LAP to advance. The timeline cannot be determined at this stage and is dependent on a number of factors. Whilst an LAP has not been prepared to date, it is still considered important to retain the objective to prepare an LAP during the currency of the plan. The LAP also affords protection of these lands substantially for amenity in the longer term.

		<p>CE Recommendation</p> <p>Amend section 10.27 Specific Objectives – insert text in green as follows:</p> <p>Prepare a Local Area Plan for Murrough within the period of the plan.</p>
GLWC-C2-78 Lisa Fahy	<p>Objective for delivery of Murrough LAP should include a timeline</p> <p>The importance of housing accommodation within the MASP area, which includes Murrough, should not be underestimated.</p> <p>Additional housing should be accommodated in Murrough.</p> <p>Section 10.26 Murrough LAP" of the Draft Development Plan recognises the development potential of Murrough as a strategic location with access to existing infrastructure and the capacity to accommodate mixed use development and recreational facilities. We welcome the inclusion of an objective to deliver a Local Area Plan although the timeline for completing this work is unclear.</p> <p>Submission agrees that the provision of recreational facilities in East Galway will provide a better quality of life for future, and existing communities in the area.</p>	<p>CE Response</p> <p>It is an objective to prepare a LAP for Murrough. Residential development will be part of the overall mix of uses on these lands. It is noted however that these lands are earmarked primarily for recreation and amenity facilities as explained in section 10.26. One third of the land will be dedicated to mixed use development, which will maximize the development of recreation facilities and will create a vibrant area.</p> <p>While the statutory process has not commenced, work is ongoing to seek solutions to some of the challenges associated with the site. A flood risk assessment has been undertaken of the lands. There has been ongoing consultation with key stakeholders such as GMIT who are significant landowners in the area. Consultation with Irish Rail with regard to options for access have also been undertaken.</p> <p>A resolution to some of the challenges would enable the LAP to advance. The timeline cannot be determined at this stage and is dependent on a number of factors.</p> <p>Whilst an LAP has not been prepared to date, it is still considered important to retain the objective to prepare an LAP.</p> <p>CE Recommendation</p> <p>Amend section 10.27 Specific Objectives – insert text in green as follows:</p> <p>Prepare a Local Area Plan for Murrough within the period of the plan</p>

<p>GLWC-C2-123 Owen Hanley</p>	<p>Murrough LAP should be Prioritised</p> <p>The Murrough LAP should be prioritised within the City Development Plan.</p>	<p>CE Response</p> <p>A resolution to some of the challenges of these lands would enable the LAP to advance. The timeline cannot be determined at this stage and is dependent on a number of factors. Amended text is recommended to state that it will be carried out during the period of the plan (See above recommendation).</p> <p>In terms of LAP preparation, the Headford Road LAP is the priority LAP to be prepared at the present time. This is in light of the current housing crisis and aims of the national housing strategy Housing for all.</p>
<p>GLWC-C2-146 Iarnród Éireann / Irish Rail</p>	<p>Iarnród Éireann advise in relation to the Murrough LAP area that intensification of use of the level crossing which provides access to Murrough House is not permitted. Iarnród Éireann will support Galway City Council with the development of suitable alternative access to develop these lands.</p>	<p>CE Recommendation</p> <p>It is recommended that text is added to Section 10.26 Murrough LAP as follows:</p> <p>Amend Section 10.26 Murrough LAP – text in green as follows:</p> <p>The plan will allow for mixed-use development, which will maximize the development of recreation facilities and will create a vibrant area with efficient public transport links to the rest of the city. It will integrate with the amenity facilities at Ballyloughane beach. The plan will include for examination of options to address the access challenges associated with these lands. It will examine suitable options for vehicular access noting that the intensification of use of the existing level crossing is not appropriate. The Plan will take account of the sensitive ecological environment at this location and will incorporate appropriate measures to mitigate against flood risk. In order to achieve the necessary recreational facilities, two thirds of the area will be reserved for this purpose.</p>

10.27 - Specific Objectives		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-127 Roselyn Carroll	<p>Policy 10.27.5 - Regeneration and Opportunity Sites</p> <p>Revise Section 10.27 Item 5. This clause is vague and does not protect against the exclusion of the public on statutory consultation. Where public lands are involved Local Area Plans should be required instead of the lesser master plan. Spatial Frameworks can be managed within LAP.</p>	<p>CE Response</p> <p>It is not considered appropriate to prepare local area plans for all public owned sites in the city. The inclusion of a requirement in the draft plan to prepare masterplans, frameworks plans or spatial frameworks is to ensure that redevelopment proposals are considered in a holistic and integrated manner at the very earliest stage of planning and urban design.</p> <p>The inclusion of these requirements is over and above the standard development management required documents. It is considered a positive requirement in that it puts an onus on the applicant to consider all aspects of urban design, placemaking and traffic impact in a comprehensive manner. For larger sites, it facilitates how phasing proposals can be accommodated into design. The draft plan approach to development is a plan led approach supported by the strategic Core Strategy, environmental assessments and development management guidelines and standards.</p> <p>Any proposals will be subject to the standard development management process which includes for public notice and a statutory period for interested parties to participate in the planning process. The development management process also includes for referral to prescribed bodies. It also facilitates further public engagement with the option of appeal to An Bord Pleanála.</p> <p>It should be noted that it is current practice in many local authorities to reduce the number of LAPs and many existing LAPs on expiry have been subsumed into statutory development plan. The Draft Development Plan Guidelines (2021) state that rather than having a commitment to produce a large number of LAPs that planning authorities should examine if appropriate objectives and policies</p>

		can be included in the development plan which would be sufficient to provide a planning framework for development.
GLWC-C2-127 Roselyn Carroll	Policy 10.27.4 - Headford Road Area Reverse Specific Objection for example in Table 10.27, Item 4. The current draft is contrary to good planning practice.	CE Response The inclusion of a specific object that in advance of the adoption of the Headford Road LAP, any proposals to advance development of the Dyke Road Regeneration site by the GCC/LDA having regard to the socio-economic benefits for the city will be considered, subject to the preparation of a masterplan is considered appropriate having regard to the strategic importance of this site and the potential for it to be a catalyst for wider regeneration. The wording includes that any masterplan will be required to take cognisance of the integrated development strategy included for in the framework plan for this area and the guidance in Chapter 8. This is considered appropriate to ensure that the principles of high quality urban design will be addressed and that the principles of the overall framework for the Headford Road lands which is still valid will be included.
GLWC-C2-72 Land Development Agency	Amendment to Specific Objective Text Require the preparation of masterplans and spatial frameworks to inform development proposals on Regeneration and Opportunity Sites, the LDA request that this be amended to include subject to the agreement of the planning authority in order to allow for flexibility	CE Response The requirement to prepare masterplans and spatial frameworks to inform development proposals on Regeneration and Opportunity Sites is a mandatory requirement. Their preparation will assist the LDA and others in achieving the optimum regeneration of these sites in an integrated, holistic and comprehensive manner. They are not mechanisms which will stymie flexibility. Their preparation at the early stages of regeneration proposals will enhance the overall process and will enable the flexibility which is being sought, and give context and clarity to any emerging planning proposals and phasings.

Chapter 10 Compact Growth and Regeneration CE Report Recommendations

- Amend Section 11.2.6 Commercial/Industrial CI Land Use Zoning Objective and insert text in green as follows:

Zoning Objective CI <p>To provide for enterprise, light industry and commercial uses other than those reserved to the CC zone</p>	
Uses which are compatible with and contribute to the zoning objective, for example	<ul style="list-style-type: none"> – Warehousing/Storage – Retail of a type and of a scale appropriate to the function and character of the area – Specialist offices – Offices of a type and of a scale appropriate to the function and character of the area – Light Industry – Accommodation for the Traveller Community – Childcare facilities – Community and cultural facilities – Allow for development of Regeneration and Opportunity Sites in accordance with the provisions of Chapter 10 and Policy 10.2 Strategic Regeneration and Opportunity Sites, particularly where it is identified to provide for mixed use development which includes for residential.

Amend Section 11.2.7 City Centre Land Use Zoning Objective and insert text in green as follows:

Zoning Objective CC <p>To provide for city centre activities and particularly those, which preserve the city centre as the dominant commercial area of the city</p>	
Uses which are compatible with and contribute to the zoning objective, for example	<ul style="list-style-type: none"> – Retail – Residential – Offices, banks and professional services – Tourist related uses – Cultural and community uses – Buildings for education – Recreation – Childcare facilities – Places of worship – Allow for development of Regeneration and Opportunity Sites in accordance with the provisions of Chapter 10 and Policy 10.2 Strategic Regeneration and Opportunity Sites, particularly where it is identified to provide for mixed use development which includes for residential.

- Amend Section 10.27 Specific Objective and Include the following specific objective outlined in green:

Regeneration and Opportunity Sites

Require the preparation of masterplans and spatial frameworks to inform development proposals.

6.Master plans, spatial frameworks and development proposals for the Ceannt Quarter, Inner Harbour, Nuns Island, Royal Tara Site, Shantalla Road and Eyre Square East Regeneration and Opportunity sites shall have regard to archaeological and cultural heritage and be informed by archaeological baseline studies and impact assessments and Policy 5.2 Protected Spaces: Sites of European, National and Local Ecological Importance.

3. Amend section 10.27 Specific Objectives – insert text in green as follows:

Prepare a Local Area Plan for the Headford Road area (south of the Bodkin junction) **within the period of the plan**.

4. Amend Section 10.6 Inner Harbour Regeneration Site- text inserted in green and text removed by ~~strikeout~~ as follows:
 - Include **for** the provision of an arts/cultural facility at the developer's expense ~~and with a management regime incorporated into the development delivery that enables the long term sustainable use of such a facility. A delivery and management regime that enables the long term sustainable use of such a facility will be devised in collaboration with Galway City Council and other relevant stakeholders.~~
5. An amendment to Section 10.9 Nuns' Island Masterplan Area-insert text in green is recommended as follows:
 - Include measures to enhance amenity, **biodiversity** and open space, consider sustainable recreation opportunities and include for increased public access to the waterways. It will also be required to demonstrate a sensitive approach to the high quality waterways environment. Omit Section 10.15 Arch Motors Opportunity Site text and map
6. Omit Section 10.15 Arch Motors Opportunity Site text and map
Omit Specific objective on the Land Use Zoning and Specific Objectives map.

Amend text in Section 1.5.2 Settlement Capacity Audit third paragraph –text in green as follows:

The Regeneration and Opportunities Sites which number **29 19** in total were reviewed individually. They include lands suitable for a mix of uses with capacity for residential delivery...

7. Amend Section 10.17 Doughiska Road Opportunity Site – insert text outlined in green as follows:

Any new proposed development on this site will require a spatial framework to be prepared. In addition to the general guidance set out in Chapter 8, the framework will also take account of the archaeological context of the site and shall also integrate with the adjoining reservation for a pedestrian/cycleway. **The framework shall take account of proximity to the national road network and direct access to the national route will be prohibited.**

8. Amend Section 1010. Seamus Quirke Road Regeneration Site to extend the boundary of this site to include an additional 0.97 hectares as outlined in red on small map.
9. Amend Section 10.26 Murrough LAP – text in green as follows:



The Plan will allow for mixed-use development, which will maximize the development of recreation facilities and will create a vibrant area with efficient public transport links to the rest of the city. It will integrate with the amenity facilities at Ballyloughane beach. **The plan will include for examination of options to address the access challenges associated with these lands. It will examine suitable options for vehicular access noting that the intensification of use of the existing level crossing is not appropriate.** The Plan will take account of the sensitive ecological environment at this location and will incorporate appropriate measures to mitigate against flood risk. In order to achieve the necessary recreational facilities, two thirds of the area will be reserved for this purpose.

10. Amend section 10.27 Specific Objectives – insert text in green as follows:

Prepare a Local Area Plan for Murrough **within the period of the plan**

Chapter 11 (a): Land Use Zoning Objectives

11.2 - Land Use Zoning General		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-3 Sean Carroll	<p>Rezoning - Carraig Ban- 0.185 ha from LDR to RA</p> <p>Area marked 'A' 0.185 ha is part of Carraig Ban residential estate open space. Existing plan shows it has zoned LDR outside the estate boundary. Submission request that this is rectified.</p>	<p>CE Response</p> <p>This area is part of the open space associated with the Carraig Ban residential development and was part of the original planning permission for the estate. This space is protected by virtue of its integration into the overall permission for the estate. It is not deemed necessary to change the zoning, there are a multiplicity of estates around the city where the open spaces are part of the overall R/LDR zoned lands. Table 5.2 Open Spaces within the Green Network (p120 of the draft plan) classifies the types of open spaces within the city and includes residential open space and states that in general in residential areas only open space lands above 0.2 hectares are zoned RA.</p>
GLWC-C2-12 Gerry Burke	<p>Rezoning – Coolagh Rd (1.030 ha) from G (Agriculture and High Amenity) to LDR</p> <p>And omit designated views - Coolagh Rd</p> <p>The site is 2.4km by road/footpath to Eyre Square, putting it within walking and cycling distance of the city centre and all other essential and amenity services.</p> <p>The site is less than 1km from the designated Greenway.</p> <p>The site has Infrastructure in place serving the site: road and footpath in place at front of the site, all public utilities (sewers, water, telecommunications, ESB) readily available along the site frontage.</p> <p>The site is slightly elevated above road level making gravity connections to existing services possible.</p> <p>The high amenity lands are further west particularly those which are SAC lands to west of site.</p>	<p>CE Response</p> <p>No change is recommended with regard to these lands. The rezoning of these lands would run counter to national/regional policy set out in the NPF/RSES which is centred on promoting compact growth supporting the integrated, sequenced and sustainable development of the city and opportunities for reductions in carbon footprint.</p> <p>To rezone these lands would be contrary to the Core Strategy of the plan which is a robust evidenced based strategy for future sustainable development, arrived at following a detailed analysis of population and land use in the city taking into account a range of factors, in particular proximity to public and sustainable transport facilities, accessibility, availability of water and waste water infrastructure, proximity to services and amenities. In accordance with the Core Strategy there is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase up to 2029. Contrary to the submission, this site is not fully serviced.</p> <p>The lands are located within a larger tract of G zoned lands in this area and section 5.9 of the draft plan applies. These high amenity agricultural lands form part of the unique natural setting of the city, which provides a backdrop to the</p>

	<p>There is a protected view (specific objective) along Coolagh Road fronting the site.</p> <p>Site to the immediate south is zoned LDR.</p> <p>Request for protected view to be removed from the CDP. Views are obstructed by the vegetation and elevation of the SAC lands to the west of the site.</p>	<p>built environment and perform the function of a green belt. They are a considerable resource in terms of visual amenity located between the Coolagh road and the River Corrib.</p> <p>To allow this rezoning to LDR would represent an uncoordinated piecemeal approach to zoning. It would undermine the entire G zoning of this area and could prejudice the strategic future use of these lands in the longer term.</p> <p>The rezoning of this land to accommodate residential development would constitute an erosion of the rural character and amenity value of these lands and would be in direct conflict with the policies of the plan.</p> <p>The proposed rezoning in conjunction with other proposals for uncoordinated residential zonings undermine the overall settlement strategy in the Plan.</p> <p>The recommendation from the OPR is to restrain zoning and that an LDR zoning is unsustainable and not compatible with the compact growth approach. Any rezoning would be contrary to the recommendation of the OPR and would be inconsistent with NPF/RSES objectives in particular NSO1, NPO3 and RPO3.2.</p> <p>The submission requests the removal of a protected view. This is not recommended. This designated View no. 2 is a panoramic protected view from Coolagh Road encompassing the River Corrib and Coolagh fen and is worthy of protection. In this regard, the proposal for rezoning would conflict with policy 5.7 Community Spaces: Protected Views of Special Amenity Value with regard to protecting designated views of special amenity value.</p>
GLWC-C2-13 Tobin Consulting Engineers – Flynn family	<p>Rezone lands (2.799 ha) from A to LDR at Castlegar</p> <p>The lands are accessed from the Castlegar Road and it is stated that these lands are easily serviced with the onsite ground conditions suitable for servicing same.</p> <p>The lands are joined by G.C.C. lands to the west also zoned agriculture and lands further south are currently zoned low-density residential (LDR).</p>	<p>CE Response</p> <p>The rezoning of these lands is not recommended, it would run counter to national/regional policy set out in the NPF/RSES which is centred on promoting compact growth supporting the integrated, sequenced and sustainable development of the city and opportunities for reductions in carbon footprint.</p> <p>To rezone these lands would be contrary to the Core Strategy of the plan which is a robust evidenced based strategy for future sustainable development, arrived at following a detailed analysis of population and land use in the city taking into account a range of factors, in particular proximity to public and sustainable transport facilities, accessibility, availability of water and waste water infrastructure, proximity to services and amenities. In accordance with the Core</p>

	<p>Strategy there is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase up to 2029.</p> <p>These lands are unserviced, lacking appropriate wastewater infrastructure, and lacking appropriate pedestrian, cycle and public transport infrastructure.</p> <p>The lands are located within a larger tract of A zoned lands in this area and section 5.9 of the draft plan applies. These agricultural lands form part of the unique natural setting, which provides a backdrop to the built environment and perform the function of a green belt. They are a considerable resource in terms of defining the boundary of the city and are important for the future strategic needs of the city. There is also a protected view at this location and Policy 5.7 Community Spaces: Protected Views of Special Amenity Value includes to protect this view (V6).</p> <p>To allow this rezoning to LDR would represent an uncoordinated piecemeal approach to zoning. It would undermine the entire A zoning of this area and could prejudice the strategic future use of these lands in the longer term.</p> <p>The rezoning of this land to accommodate residential development would constitute an erosion of the rural character and amenity value of these lands and would be in direct conflict with the policies of the plan.</p> <p>The proposed rezoning in conjunction with other proposals for uncoordinated residential zonings undermine the overall settlement strategy in the Plan.</p> <p>The recommendation from the OPR is to restrain zoning and that an LDR zoning is unsustainable and not compatible with the compact growth approach.</p> <p>Any rezoning would be contrary to the recommendation of the OPR and would be inconsistent with NPF/RSES objectives in particular NSO1, NPO3 and RPO3.2.</p>
GLWC-C2-14 Galway and Roscommon Education and Training Board	<p>Keep CF zoning on Mercy Convent Galway City Site as per existing Development Plan</p> <p>In order to provide for and facilitate growth it is requested that lands that are zoned CF Institutional and Community remain zoned CF. Reference is made to the Mercy convent Galway City Site 0.276 ha which is zoned CC- City Centre in the Draft</p> <p>CE Response</p> <p>Following a review of the draft plan CC zoning of this site, it is recommended that the site be zoned for CF use as per the current 2017-2023 plan which would support uses including education and training.</p> <p>CE Recommendation</p>

	<p>City Development Plan. Keeping this land zoned CF is vital for educational and training use.</p>	<p>Change zoning of lands (0.276 ha) namely the Mercy Convent site at Newtownsmyth from City Centre CC land use zoning to CF Institutional and Community land use zoning .</p> 
GLWC-C2-21 Michael Conneely	<p>Rezone land (6.868 ha) from (A) and Recreational and Amenity (RA) to Residential at Cappagh</p> <p>Submission is for lands total 6.868 ha. They are located to the immediate south of the proposed N6GCCR Corridor. The majority of the land is currently zoned A with the south western portion zoned Recreation and Amenity. The request is for the land to be zoned residential.</p>	<p>CE Response</p> <p>The rezoning of this large bank of land (c7 hectares) from Agricultural and Recreation and Amenity land use zoning to residential zoned land use is not recommended. This rezoning would run counter to national/regional policy set out in the NPF/RSES which is centred on promoting compact growth supporting the integrated, sequenced and sustainable development of the city. It would also be contrary to national policy in the NPF which seeks to reduce our carbon footprint and integrate climate change mitigation and adaptation into planning policy (NPO54).</p> <p>To rezone these lands would be contrary to the Core Strategy of the plan which is a robust evidenced based strategy for future sustainable development, arrived at following a detailed analysis of population and land use in the city taking into account a range of factors, in particular proximity to public and sustainable transport facilities, accessibility, availability of water and waste water infrastructure, proximity to services and amenities.</p> <p>In accordance with the Core Strategy there is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase up to 2029.</p> <p>This rezoning would be contrary to the recommendation from the OPR which is to restrain zoning that is unsustainable and not compatible with the compact growth</p>

	<p>approach. Any rezoning would be contrary to the recommendation of the OPR and would be inconsistent with NPF/RSES objectives in particular NSO1, NPO3 and RPO3.2.</p> <p>The lands are primarily backland, with limited access to the Cappagh Road. They are partially located within the N6GCRR route corridor and any potential access would be within the corridor. The proposed rezoning would conflict with the specific objective for the N6 GCRR. As the N6 GCRR has been approved by An Bord Pleanála, land use objectives should safeguard the scheme corridor free from adverse development that could prejudice its delivery.</p> <p>The proposed rezoning runs counter to the existing settlement pattern in the area and to the optimal sequencing of development. It represents an uncoordinated piecemeal approach to zoning. These lands are unserviced with a poor road network. The proposed rezoning in conjunction with other proposals for uncoordinated residential zonings undermine the overall settlement strategy in the Plan.</p> <p>Within the general area, in accordance with the Core Strategy, there are lands which are zoned and serviced, have the benefit of planning permission and are enabled for development. This proposal would be contrary to the established settlement policy of the plan and could prejudice the strategic future use of these lands in the longer term.</p> <p>A section of the lands are zoned for recreation and amenity and form part of a larger area zoned for recreation and amenity use. It is considered important to retain the zoning for possible long-term use in conjunction with the adjacent Bearna/Lough Rusheen/Cappagh park. The draft plan includes policy to acquire lands for RA purposes and it is noted that nearby lands to south have been deemed suitable and required for RA purposes allied to the park. These RA and A lands also are important as they provide a backdrop to the built environment and perform the function of a green belt.</p>
GLWC-C2-24 Paddy Boyle	<p>Ballindooley Village Extension- Rezone from A to LDR</p> <p>Submission relates to figure 11.20 LDR Ballindooley and states that only part of the village is included in the LDR zoning. Submission requests that the LDR area be extended as proposed on map submitted with submission to include</p> <p>CE Response</p> <p>The existing LDR zoning at Ballindooley village reflects the historic form of the village. The definition of the village was arrived at following an assessment of the historic pattern of development which was a traditional clachan type settlement. The extensive expansion of Ballindooley village boundary as proposed is not</p>

	<p>lands outlined in blue. Submission also states that Ballindooley Village should be treated separately to Castlegar Village, as the busy N84 Rd. divides them. Sites mapped as 24 A= 20.8 ha and 24 B 0.798 ha (extension of village)</p>	<p>considered appropriate nor based on any valid analysis of the historic settlement. The proposal reflects a more recent pattern of development. Section 11.20 seeks to maintain the established character of the traditional settlement at this location. The proposal for extensive expansion would be contrary to the objectives of the draft plan to maintain the existing character. It would also erode the rural character of these hinterlands of the city.</p> <p>The extension of the village as proposed is not recommended and is essentially large scale rezoning for LDR use. This would run counter to national/regional policy set out in the NPF/RSES which is centred on promoting compact growth supporting the integrated, sequenced and sustainable development of the city. It would also be contrary to national policy in the NPF which seeks to reduce our carbon footprint and integrate climate change mitigation and adaptation into planning policy (NPO54).</p> <p>To rezone these lands would be contrary to the Core Strategy of the plan which is a robust evidenced based strategy for future sustainable development, arrived at following a detailed analysis of population and land use in the city taking into account a range of factors, in particular proximity to public and sustainable transport facilities, accessibility, availability of water and waste water infrastructure, proximity to services and amenities. In accordance with the Core Strategy there is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase up to 2029.</p> <p>The recommendation from the OPR is to restrain zoning and that an LDR zoning is unsustainable and not compatible with the compact growth approach. Any rezoning would be contrary to the recommendation of the OPR and would be inconsistent with NPF/RSES objectives in particular NSO1, NPO3 and RPO3.2.</p> <p>These lands in particular are wholly unsustainable for LDR being at a remove from existing water and waste water services and the lack of proximity to the existing public transport and pedestrian networks. The rezoning of these lands would also be contrary S28 guidelines with seek to safeguard the carrying capacity of national primary routes being located along the N84.</p>
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GLWC-C2-25	Rezone Council owned land 0.007 ha from Recreation and Amenity to Residential (request made by adjoining owner)	CE Response
Matt & Mary Lohan	<p>Request made by adjoining landowner to rezone Council owned land 0.007ha from Recreation and Amenity to (R) to allow for an application to be made for their property entrance to be relocated to the northside of their property. Roadway improvements made at this location at the Kirwan Roundabout have impacted on the property and the existing entrance is now fronted by cycleway pavement, footpath and two lanes of one-way traffic in the northerly direction.</p>	<p>In consultation with the Transport Section, it is not considered appropriate to rezone this land to allow for consideration of a residential access at this location. Such an access would have potential to create a traffic hazard and would be in conflict with the policy and obligations of the Council to ensure a high safety standard on the road network. An access at this location would result in traffic turning movements onto the slip road, exiting off the Headford Road at the Kirwan Junction would compromise the safety of traffic movements at this location.</p>
GLWC-C2-28 Martina Keane	Rezone land (0.637ha) from A to LDR at Quarry Rd., Menlo	CE Response
GLWC-C2-26 Martina Keane	<p>Request to rezone .637 ha on Quarry Rd. Menlo from (A) to (LDR). Land is located 800m from Menlo.</p> <p>Have been similar rezonings in the area. The site is of no agricultural value. A dwelling would contribute to the community.</p>	<p>This rezoning is not recommended. This site is located outside the village envelope of Menlough. The site has been the subject of five planning applications for dwellinghouses between 1991 and 2017, all of which have been refused planning permission on the basis of zoning, public health, visual amenity, character and proximity to Lough Corrib. It has also been refused on first party appeal to An Bord Pleanála. This reflects the unsuitability of this site for residential use.</p> <p>The rezoning of these lands would run counter to national/regional policy set out in the NPF/RSES which is centred on promoting compact growth supporting the integrated, sequenced and sustainable development of the city and opportunities for reductions in carbon footprint.</p> <p>To rezone these lands would be contrary to the Core Strategy of the plan which is a robust evidenced based strategy for future sustainable development, arrived at following a detailed analysis of population and land use in the city taking into account a range of factors, in particular proximity to public and sustainable transport facilities, accessibility, availability of water and waste water infrastructure, proximity to services and amenities. In accordance with the Core Strategy there is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase up to 2029.</p>

	<p>This land in particular is wholly unsustainable for LDR zoning being at a remove from existing water and waste water services and the lack of proximity to the existing public transport and pedestrian networks. This site constitutes haphazard, backland development as reflected on the map where it is notable for its islanded nature within a larger cohesive tract of A agricultural zoned lands which flank Lough Corrib. To allow for small pockets of development such as this has the consequent effect of eroding the definition of Menlough village boundaries and runs counter to protecting and preserving the distinctive village character.</p> <p>These agricultural lands form part of the unique natural setting, which provides a backdrop to the built environment and perform the function of a green belt. They are a considerable resource in terms of visual amenity and defining the boundary of the city. They are also important for the future strategic needs of the city.</p> <p>To allow this rezoning to LDR would represent an uncoordinated piecemeal approach to zoning. It would undermine the entire A zoning of this area. The rezoning of this land would constitute an erosion of the rural character and amenity value of these lands and would be in direct conflict with the policies of the plan.</p> <p>The recommendation from the OPR is to restrain zoning and that an LDR zoning is unsustainable and not compatible with the compact growth approach. Any rezoning would be contrary to the recommendation of the OPR and would be inconsistent with NPF/RSES objectives in particular NSO1, NPO3 and RPO3.2.</p>
GLWC-C2-31 FX O'Brien	<p>CC Zoning Concern-Forster Street</p> <p>Concern that Forster Street area is not zoned residential (R) and that current City Centre (CC) zoning will not support objectives outlined in section 10.1.</p> <p>Welcomes the CF zoning around the church.</p> <p>Call for active engagement from all GCC departments with city centre residents in relation to road closures for outdoor dining.</p> <p>CE Response</p> <p>It is noted that the City Centre comprises a variety of uses and the CC zoning objective considers that residential use is one of a mix of uses which is compatible with the zoning and contributes to the zoning objective. Forster Street is primarily a commercial street and it is not deemed appropriate to rezone it to residential use. In contrast to the suburbs where R zoning is the predominant land use, within the city centre it is acknowledged that there can be conflict between residential and commercial uses which requires a balanced approach. While the city centre residential may not have the environmental context of a suburban residential area, there are considerable benefits of city centre living. The draft plan includes a policy framework to support new residential</p>

		<p>development on regeneration and brownfield city centre sites and for reuse of vacant upper floors within the city centre.</p> <p>It is considered that the implementation of the GTS and the Public Realm Strategy will enhance the environment of the city centre with reductions in traffic movements and improvements to the overall ambience of the city centre. As part of the detailed design and implementation of GTS projects, issues which impact on amenity of affected streets will be considered and there will be opportunities for consultation on specific projects. Projects such as the cross city link, the new pedestrian bridges and the flood relief scheme all combine to enhance the quality of city centre living. Projects granted funding under the URDF for new and upgraded public realm spaces in the city centre will also add to the amenity for residents in the city. It is noted that conflicts between uses which arise are often addressed through enforcement and management and other legislative codes. These are issues that are outside of the scope of the development plan and are part of the wider local authority service delivery plans and operational programmes. A change to the draft plan is not recommended.</p>
GLWC-C2-43 Galway Race Committee	<p>Section 11.2.5 'Industrial I Land Use Zoning Objective'</p> <p>An alternative option for the provision of stables must be explored due to the removal of a condition by An Bord Pleanála in the recent approval for the N6 GCRR.</p> <p>This submission requests the insertion of a site-specific objective to Section 11.2.5 'Industrial I Land Use Zoning Objective' that would allow for the provision of ancillary facilities relating to the operation of the racecourse to be built on the Industrial zone lands to the north of the Ballybrit Racecourse.</p> <p>Submission outlines that the recent planning application for the N6 GCRR included commitments in order to safeguard the operational capacity of the racecourse, its facilities and uses during both the construction and operation phases of the road development.</p>	<p>CE Response</p> <p>The importance of the Galway races to the economy of the city is noted in Chapter 6 and it is recognised that essential facilities are required to ensure the continued operation of the facility. As requested in this submission it is important to ensure that the operational capacity of the racecourse is safeguarded and in this regard it is deemed appropriate to allow for consideration of the use of the I zoned lands adjacent to the racecourse to the north to facilitate essential infrastructure to support the racecourse.</p> <p>CE Recommendation</p> <p>Amend Section 11.2.5 Industrial I Land Use Zoning Objective and insert the following specific development objective - text in green :</p> <p>Lands zoned I located north of Ballybrit Racecourse. The Council will consider the provision of essential supporting racecourse infrastructure on a portion of these lands and where it is demonstrated that it cannot reasonably be accommodated on the adjoining RA lands, without jeopardising the function of Galway Racecourse.</p>

	<p>Condition 5 of the ABP permission omitted the proposed permanent stables to be provided at Galway Racecourse.</p> <p>Appropriate stable facilities, to a standard acceptable to the Irish Horse Racing Board, are essential for the continued operation of the racecourse.</p>	
GLWC-C2-49 John Furey	<p>Rezone land from RA to R (2 requests relating to separating sections of landholding) at Dublin Rd and Doughiska Rd.</p> <p>Submission is seeking to rezone Site "A" from RA-Residential. This is marked as 49 A on map and is 1.27 ha.</p> <p>Submission is also seeking to rezone Sites marked "D and E" from RA to R. This is marked on map as 49 B and is 1.888 ha.</p> <p>Rezoning of these lands would facilitate access for residential lands to the north and to the pumping station.</p>	<p>CE Response</p> <p>These 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 from the east. Change in the zoning of RA lands in the city to development use has been deemed inappropriate over a series of development plans and there is no change or necessary reason now to alter this approach. These lands are a considerable resource for the city in terms of passive recreation and amenity and have significant attributes in terms of climate action supporting carbon sequestration and extensive biodiversity. In particular, they provide an important green buffer zone along the Dublin road and are an ecological corridor linking with Merlin woods. They also function as a transition zone into Merlin lane and Doughiska road, giving these areas better definition as a neighbourhood and minimises the visual impact on the access into the city. In considering rezoning of lands in this area it is considered essential that these lands are reserved for RA land use.</p> <p>In accordance with the Core Strategy there is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase up to 2029.</p> <p>It is also considered that any rezoning at this location could prejudice the best alignment and function of the Dublin Road Bus corridor which is a public transport project of major strategic importance for the city incorporating bus priority measures on Dublin Road from Moneenageisha to Martin Roundabout, including walking and cycling infrastructure, in accordance with the GTS.</p>
GLWC-C2-39 Salthill	Rezone Lands at Clybaun and Rahoon Rd from G to R(5.145 ha)	<p>CE Response</p> <p>The rezoning of this large bank of land (c5.2 ha) from G land use zoning to residential zoned land use zoning is not recommended. It would run counter to</p>

Knocknacarra GAA	<p>Submission relates to lands (5.145 ha) just north of the cross-roads of Clybaun and Rahoon Roads within the townlands of Keeraun and Mincloon in Rahoon, Co. Galway.</p> <p>The subject site is 'edge of centre', located approximately 5km from the city centre and is a 15-minute drive / 20-minute cycle.</p> <p>The N6 Ring Road will enhance the accessibility of the subject site greatly.</p> <p>The subject site is currently served by public transport and it is considered that the site's connection opportunities will be greatly improved by the introduction of the N6 Ring Road.</p> <p>Submission outlines the planning history on the site and addresses the refusal reasons of application reg. ref. 14337 which included access and impact on the N6GCRR.</p> <p>The submission outlines that there has been Large Scale Residential Development in the immediate area of the proposed site. They have set a precedent for large scale residential development in this area and the development context locally is informed by such residential development.</p> <p>The census data indicates significant population growth in the area and zoning will support this growth.</p> <p>Zoning supports the principles of compact growth set out in the NPF and RSES.</p> <p>In accordance with the MASP and the Core Strategy, this is considered an area for potential growth.</p>	<p>national/regional policy set out in the NPF/RSES which is centred on promoting compact growth supporting the integrated, sequenced and sustainable development of the city. It would also be contrary to national policy in the NPF which seeks to reduce our carbon footprint and integrate climate change mitigation and adaptation into planning policy (NPO54).</p> <p>To rezone these lands would be contrary to the Core Strategy of the plan which is a robust evidenced based strategy for future sustainable development, arrived at following a detailed analysis of population and land use in the city taking into account a range of factors, in particular proximity to public and sustainable transport facilities, accessibility, availability of water and waste water infrastructure, proximity to services and amenities. In accordance with the Core Strategy there is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase up to 2029.</p> <p>The recommendation from the OPR is to restrain zoning that is unsustainable and not compatible with the compact growth approach. Any rezoning would be contrary to the recommendation of the OPR and would be inconsistent with NPF/RSES objectives in particular NSO1, NPO3 and RPO3.2.</p> <p>Access to the lands would include access on to the N6GCRR route corridor with potential for impact on the strategic functionality of the route corridor. The proposed rezoning would conflict with the specific objective for the N6 GCRR. As the N6 GCRR has been approved by An Bord Pleanála, land use objectives should safeguard the scheme corridor free from adverse development that could prejudice its delivery.</p> <p>The proposed rezoning runs counter to the existing settlement pattern in the area and to the optimal sequencing of development. It represents an uncoordinated piecemeal approach to zoning on lands located beyond the built up area and the N6 route. These lands in particular are wholly unsustainable for R zoning being at a remove from services and remove from the existing and proposed public transport and pedestrian networks. More suitable accessible lands are available and zoned for development that can meet the housing supply targets as provided for in the Core Strategy.</p> <p>These lands are a considerable resource for the city in terms of amenity and they form part of the unique natural setting, which provides a backdrop to the built</p>
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		<p>environment. These lands also have significant attributes in terms of climate action supporting carbon sequestration and extensive biodiversity and form part of the greenbelt between the City and the County. The distinction of the G zoning objective is that G zoned lands are agricultural land use but also have an important natural environment and landscape value, which distinguishes them from less visually sensitive and amenity rich agricultural lands.</p> <p>It is considered that if permitted, residential development at this location would adversely impact on the rural character and scenic amenity of the area and the unique landscape and environment of this part of the city. .</p> <p>It is recommended that the existing G zoning be retained.</p>
GLWC-C2-50 Oliver Daniels	Observation to zoning submission received from Salthill GAA for zone change from G to R for 5.145 ha at Rahoon.	CE Response This submission is noted. See response to submission 39 above.
GLWC-C2-52 Ronan McDonagh	This proposal is premature, given the lack of infrastructure, and the already hazardous state of the roads. Traffic is already a huge problem on these narrow country roads, with no footpaths, street lighting or proper road cambering.	
GLWC-C2-195 Robert Keane	<p>No Environmental Impact Reports were prepared to understand the potential impact to a delicate terrain, which is connected to areas designated as SAC, SPA and NHA which are within 2km of the site.</p> <p>Concerns raised about the potential of flooding surrounding lands.</p> <p>Significant lands already designated as residential in the area yet to be developed. The proposed rezoned land (14 acres), has no access to the public sewage system, no access to public transport, no foot paths and no street lighting.</p> <p>The land in question is totally unsuitable for high density development given the impacts that would have from an environmental perspective.</p> <p>There are two significant streams flowing through these lands, The Tonabrocky Stream (EPA Code: 31T13), and the Barna</p>	

	<p>Stream (EPA Code: 31B01). Both streams ultimately flow South to Galway Bay and into both the Galway Bay SPA and SAC and is proximate to existing wetlands.</p> <p>There are no lands north of the Rahoon Rd, which are zoned residential currently. A proper plan for the area, working with the lands already designated as residential, to include widening of the roads, provision of footpaths, street lighting, playing facilities needs to be the priority.</p> <p>These lands are Agricultural and High Amenity for a reason, because that is what they are and what they should remain. The proposal will have a considerable impact on biodiversity.</p>	
GLWC-C2-53 Jimmy Francis	<p>Rezone land (1.315 ha) at Ballinfoyle from Recreational and Amenity (RA) to Residential (R)</p> <p>Submission requests residential zoning to be extended to the rear of his residence (lands currently zoned Recreational and Amenity, 1.315 ha.) to coincide with the proposed greenway and also the line of the southern boundary of Sandyvale, Suan and Luas/Cluain Fada.</p> <p>These lands are readily accessible and should be zoned R taking into account the current housing shortages.</p> <p>There would be no loss of privacy/amenity to any parties in relation to the proposed change of zoning.</p> <p>The proposed southern boundary of the lands to be zoned for residential purposes would generally coincide with developments that exists, both to the east and west and could be seen as primarily infill development, representing minimal changes to the general area.</p>	<p>CE Response</p> <p>These lands were zoned for Residential use in the 2011-2017 plan. As part of the preparation of the current 2017-2023 plan, these lands were reviewed in the context of flood mapping prepared by the OPW as part of the CFRAM programme which was completed in 2017. The CFRAM identified Flood Zones A and B in the city and indicated that these lands are at flood risk. Arising from this, these lands together with local authority owned lands were directed to be zoned RA by the OPW as the residential zoning was deemed to be contrary to section 28 guidelines namely the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009). The lands are largely within the Flood Zone A and as such only water compatible development would be considered appropriate. Despite assessment at the time with regard to potential for mitigation measures, the residential land use zoning was deemed to be inappropriate.</p> <p>On review of this current submission, the situation has not changed. In consultation with our Strategic Flood Risk Assessment consultants, they have considered the flood mapping and state that the lands in question are wholly within Flood Zone A. They state that the requested residential zoning is a highly vulnerable land use and the RA zoning of these lands should be retained.</p> <p>Notwithstanding the flood risk associated with these lands, sufficient zoned lands have been identified to cater for future growth in accordance with the Core</p>

		Strategy. There is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase up to 2029.
GLWC-C2-55 Gaughan Family	<p>Rezone land (1.011 ha) at Menlo from G to LDR</p> <p>Request to rezone 1 ha of 2 ha landholding at Menlo "village envelope" from G- Agriculture and High Amenity to LDR- Low Density Residential, as per map submitted. (Submission indicates rezoning from Objective G5 to Objective R1).</p> <p>Rationale for rezoning states that it would be within the pattern for development which has formed in recent years: 14/258 (retention application for windows and doors), 21/218- Retention application for changes to dwelling and garage and 21/65- extension application to dwelling are all referenced. It is also indicated would allow for members of the landholding renting in Menlo to build on these lands should they be rezoned.</p>	<p>The proposal to extend the LDR zoning outside the village envelope of Menlough is not deemed appropriate. The existing village envelope reflects the historic form of the village. The definition of the village was arrived at following an assessment of the historic pattern of development which was a traditional clachan type settlement. The extension of the village and the rezoning of the subject land to LDR for two dwelling houses as proposed would constitute haphazard development, would dilute the character of Menlo village and would further diminish the G zoned lands in this area which are a valuable asset to the city.</p> <p>The draft plan in Chapter 3 and Policy 3.9 Village Envelopes/Areas seeks to strengthen and protect the character of the village, to maintain the established character of the traditional settlement. The proposal to extend the LDR zoning would erode the rural character of this hinterland of the city. To allow for small pockets of development such as this has the consequent effect of eroding the definition of Menlough village boundaries and runs counter to protecting and preserving the distinctive village character.</p> <p>To allow LDR rezoning would also run counter to national/regional policy set out in the NPF/RSES which is centred on promoting compact growth supporting the integrated, sequenced and sustainable development of the city. It would also be contrary to national policy in the NPF which seeks to reduce our carbon footprint and integrate climate change mitigation and adaptation into planning policy (NPO54).</p> <p>To rezone these lands would be contrary to the Core Strategy of the plan which is a robust evidenced based strategy for future sustainable development, arrived at following a detailed analysis of population and land use in the city taking into account a range of factors, in particular proximity to public and sustainable transport facilities, accessibility, availability of water and waste water infrastructure, proximity to services and amenities. In accordance with the Core Strategy there is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase up to 2029.</p> <p>The recommendation from the OPR is to restrain zoning and that an LDR zoning is unsustainable and not compatible with the compact growth approach. Any</p>

		<p>rezoning would be contrary to the recommendation of the OPR and would be inconsistent with NPF/RSES objectives in particular NSO1, NPO3 and RPO3.2.</p> <p>These lands in particular are unsustainable for LDR being at a remove from waste water services and due to the lack of proximity to the existing public transport networks.</p>
GLWC-C2-56 Ruth Burke	<p>Zone Change for 0.679 ha site from G to CI at Coolagh Road, Terryland</p> <p>The site has been commercial in nature since the 1980s. Rezoning to CI would allow for yard area to be rezoned to allow for light business activity, such as storage. The building is currently vacant.</p> <p>The submission notes that this zone change would not lead to any negative impact on the amenity of the area and that planning conditions relating to restrictions on traffic movement, hours of operation, etc. could be imposed.</p> <p>Submission indicates that they would be prepared to set back their driveway from the road boundary to allow the council to continue to use the footpath to Menlo. This footpath currently stops at the entrance to their house.</p> <p>The submission states that the land is at the edge of the city and is easily accessible from Headford Rd and the Dyke Rd. with footpaths along the Coolagh road.</p> <p>Land is not suitable for agricultural use. There are sites with commercial zoning within close proximity to site.</p>	<p>CE Response</p> <p>There is no justification for any additional lands to be re-zoned for commercial purposes and is no merit in changing zoning on this specific site.</p> <p>This site has been the subject of previous planning history whereby a commercial use on the site was refused planning permission for a variety of reasons including injury to amenity of surrounding residential property, negative impact on visual amenity, environmental impact in close proximity to the Corrib and non-compliance with relevant standards.</p> <p>To re-zone the site to CI may not resolve these issues and it is not appropriate to change the zoning in the Development Plan in an attempt to resolve a problem on one particular site.</p> <p>To change the zoning to CI land use at this location would not comply with the retail strategy for the city which was arrived at following examination of the requirements for existing and future commercial floorspace, and the best locations within the city for such zoning. There is adequate amount of lands zoned for this purpose and the proposed re-zoning presents a conflict with the overall strategic development of the city and the Core Strategy.</p> <p>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.</p> <p>In addition to the general arguments against zoning this site CI there are particular characteristics of the site that render it unacceptable also. This site being located in an area with residential development either side does not lend</p>

	<p>itself to commercial use. This is in the interests of protecting residential amenity. A CI zoning would give rise to significant challenges in reconciling commercial design and uses while protecting the adjoining residential amenity against likely standard negative impacts from commercial developments such as noise, light pollution and traffic movements.</p> <p>This area lacks essential services to accommodate a commercial land use at this location. The road network in this area would not have the capacity to accommodate the intensification of use that would arise from a CI land use.</p> <p>In addition the site is partially located within the Lough Corrib SAC and on lands designated as a proposed Natural Heritage Area. Any proposed rezoning would conflict with the policies of the plan to protect these areas.</p> <p>The existing G zoning reflects the sensitivities of the unique environment of this area.</p> <p>It is recommended that the land remain zoned G.</p>
GLWC-C2-60 Castlegar GAA	<p>Specific Objective for Local Centre- Castlegar GAA</p> <p>Request to rezone the existing buildings and infrastructure to Local Centre as per the Galway City Development Plan 2017-2023. This will allow the facilitation of coffee shops and stores to support the community on many levels, including financially, to improve the development of the Castlegar GAA Club</p>
GLWC-C2-123 Owen Hanley	<p>The submission states that development of a mixed-used local centre would have a huge benefit to a growing local community.</p> <p>It states that the council must ensure that the development of Bus Connects in this area reflects such a designation, ensuring that access to the bus stops is facilitated for all. The Council would also need to ensure increased pedestrian facilities connecting to this location.</p> <p>CE Response</p> <p>This submission relates to Castlegar GAA club at the Dublin Road/Roscam road junction. It is not considered appropriate to designate this site as a Local Centre. Under the draft plan, it is considered that there is a clear retail hierarchy with sufficient zoned and designated areas to meet local needs in this general area and to propose additional designations may undermine the viability of existing centres.</p> <p>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.</p> <p>This would be premature pending completion of a retail strategy. Policy 6.11 Retail Strategy requires to review the strategies and policies for retailing following the preparation of a joint retail study with Galway County Council, to ensure sufficient policy support to create a positive framework for continued vitality and</p>

		<p>investment in the main retail areas especially the Galway MASP and to ensure an informed and consistent approach to policies relating to shared retailing activities in line with national policy. This is envisaged to commence in 2022/2023.</p> <p>Notwithstanding the above, it would appear the overtur for local centre is based on the financial income it would generate for the club, not proper planning and sustainable development. In this regard this is not a valid consideration for the best use of land. It is a requirement that all decisions must be evidenced based and based on sound proper planning and development principles and not to enhance the economic value of an asset.</p> <p>The area already has a valuable recreation and amenity function and to allow for CI use could compromise this function.</p>
GLWC-C2-62 Matthew Gannon	<p>Rezone 3.52 ha of land zoned Agriculture A to Low Density Residential (LDR) at Cappagh</p> <p>The Land is on the Cappagh Rd (L5025) and is located less than 1km from the roundabout where the Western Distributor Rd transects the Cappagh Rd. The author submits that the lands in question are of insufficient quantity to facilitate a genuine contribution towards Agricultural usage or food production.</p> <p>This submission argues for a change of zoning to provide for Low-Density Residential (LDR) development which while allowing for limited residential development also ensures the protection of existing residential amenity and environmental sensitivities.</p> <p>The site borders an existing tract of Low-Density Residential Land within Cappagh, and the combination of both land tracts provides for a Suitable Village Envelope within the townland similar to other village envelopes in the city.</p> <p>The townland of Cappagh has a distinct character. This location within the townland has an historical settlement</p>	<p>CE Response</p> <p>The rezoning of this large bank of land (c3.52 hectares) from Agricultural land use zoning to LDR zoned land use would run counter to national/regional policy set out in the NPF/RSES which is centred on promoting compact growth supporting the integrated, sequenced and sustainable development of the city. It would also be contrary to national policy in the NPF which seeks to reduce our carbon footprint and integrate climate change mitigation and adaptation into planning policy (NPO54).</p> <p>To rezone these lands would be contrary to the Core Strategy of the plan which is a robust evidenced based strategy for future sustainable development, arrived at following a detailed analysis of population and land use in the city taking into account a range of factors, in particular proximity to public and sustainable transport facilities, accessibility, availability of water and waste water infrastructure, proximity to services and amenities. In accordance with the Core Strategy there is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase up to 2029.</p> <p>The proposed rezoning runs counter to the existing settlement pattern in the area and to the optimal sequencing of development. It represents an uncoordinated piecemeal approach to zoning. The proposed rezoning in conjunction with other proposals for uncoordinated residential zonings undermine the overall settlement strategy in the Plan. This proposal would be contrary to the established</p>

<p>pattern which includes historic residential development on the land proposed for rezoning here.</p> <p>The location is within walking distance of existing public transport services serving the city centre. The suggestion of the development of a Park & Ride Facility at the junction of Cappagh and the Western Distributor Road enhances the attraction of the area for Low Density Residential Development.</p> <p>In Cappagh, new residential development is confined to those who are existing landowners, which prohibits the opportunity for a generation reared in Cappagh to continue to live in the community in which they were reared. Lands are zoned in other townlands.</p> <p>The draft development plan does not propose any increase in the quantity of specific Low-Density Residential Land. This limits the choice for potential homeowners and reduces the choice for householders of a certain size.</p>	<p>settlement policy of the plan and could prejudice the strategic future use of these lands in the longer term.</p> <p>These lands in particular are wholly unsustainable for LDR use in terms of poor accessibility, the compromised road network and the lack of proximity to the existing public transport networks. Also the lands are remote and isolated from the existing water and waste water services. The access road is extremely narrow with little / no capacity for two cars to pass, with no footpaths. They are at a remove from the built up area of Knocknacarra and community facilities and also would be completely at odds with GTS being at a remove and isolated from existing and future planned public transport networks.</p> <p>The location of the lands north of the N6 GCRR corridor too would result in uncoordinated development outside of the corridor line when there are opportunities for a more sequential co-ordinated and consolidated approach available inside of this line.</p> <p>It runs counter to the existing settlement pattern in the area and to the optimal sequencing of development.</p> <p>The site is a backland site with limited access onto the Cappagh Road. It is located within a larger tract of A zoned lands in this area. These agricultural lands provide a backdrop to the built environment. They are a considerable resource in terms of visual amenity, defining the boundary of the city and for the future strategic needs of the city. To allow this rezoning to LDR would undermine the entire zoning of this area and would create a precedent for further rezoning in this area.</p> <p>The unsuitability of these lands for residential development is evidenced by the refusal of planning permission on public health and traffic safety grounds for 11 houses on lands to the north of this site (Pl. Ref 19/176) which are zoned LDR and have similar characteristics to the subject lands.</p> <p>It is also the recommendation from the OPR is to restrain zoning and that an LDR zoning is unsustainable and not compatible with the compact growth approach. Any rezoning would be contrary to the recommendation of the OPR and would be inconsistent with NPF/RSES objectives in particular NSO1, NPO3 and RPO3.2.</p>
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GLWC-C2-63 GRETB	<p>Zoning to remain as CF Institutional and Community at GTI and GCC, and I Enterprise, Industry & Related uses at Mervue Business Park</p> <p>Submission states that it is vital that lands that the zoning as "CF" Institutional and Community at GTI and GCC, and "I" Enterprise, Industry & Related uses at Mervue Business Park is retained.</p>	<p>CE Response</p> <p>This submission welcomes the CF" Institutional and Community land use zone at the Galway Technical Institute and Galway Community College and "I" Enterprise, Industry & Related land use zoning at Mervue Business Park and request that these zonings be retained. In response, there are no proposals to change these zonings.</p>
GLWC-C2-65 Clearwater Ventures Ltd c/o MKO	<p>Rezoning of 0.86 'RA' lands to the south of Spinnaker House Hotel Site, Knocknacarra Rd. to 'R'</p> <p>This landholding spans two separate zoning objectives in the extant City Development Plan, 'R' (Residential) and 'RA' (Recreational Amenity). The current 'R' and 'RA' lands extend to 2,240sqm and 862sqm respectively. The existing Spinnaker House Hotel and retail premises occupies the R area, while the RA zoned land within the site is used as a surface car park.</p> <p>The lands currently zoned 'RA' and extends to 862 sqm. The site in question is currently used as a surface car park which was granted unconditional planning permission under PI Ref 95/159 on the 4th July 1995.</p> <p>Having regard to the nature of the site which accommodates a permitted surface carpark and the abundance of RA land abutting the subject site and in the wider area, it is considered reasonable that the subject lands could be designated for Residential development, without compromising the ethos of the Draft CDP to provide for and protect recreational uses, open space, amenity uses and natural heritage.</p> <p>It is submitted that the current 'RA' zoning on the subject lands is inappropriate given its planning history and its existing use as a surface car park. Having regard to the nature of the site which accommodates a permitted surface car park and the proliferation of RA land abutting the subject</p>	<p>CE Response</p> <p>It is considered appropriate to retain the RA zoning at this location. 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 coastal setting, of high environmental, visual and biodiversity value that frames the views of the coastline and the approach to the city from the west. A change in the zoning of these lands to development use has been deemed inappropriate over a series of development plans and there is no necessary reason now to alter this approach. It is important to preserve these lands and restrict any further encroachment into this RA land bank.</p> <p>A specific development objective is set out in Chapter 11 section 11.2.8 in relation to the Spinnaker Hotel Site which is considered reasonable and was inserted specifically in the current plan 2017-2023 in response to the change in zoning from CI to R at the request of the owner at that time. It states that any development including ancillary requirements will be <i>designed so as not to impact the integrity of adjacent protected views and that the Council will consider the adjoining RA zoned lands of approximately 0.086 hectares, associated with the existing use on the site to be used for the purposes of communal open space requirements associated with the redevelopment of the site for residential purposes, where it can be demonstrated that the entirety of this area will be restored to a natural, open environment and landscaped with native and biodiversity enhancing species. This RA land will not be permitted to be used for compliance with plot ratio standards nor used for car parking purposes. Credit will be given for existing floor space in the assessment of any future re-development.</i></p> <p>This gives a density and open space credit as part of any future development which is considered a generous contribution. It is intended to incentivise the lands to be rehabilitated and to ensure that the rear building line does not encroach</p>

	<p>site and in the wider area, it is considered reasonable that the subject lands could be designated for Residential development without compromising the spirit of the Draft CDP to provide for and protect recreational uses, open space, amenity uses and natural heritage.</p>	<p>beyond the existing residential zone in order also to minimise the impact on the unique amenity of the promenade extension. The rehabilitation of this RA land as part of any future development is particularly important in the context of Chapter 5 policy to protect enhance and restore biodiversity and will accord with climate action policy in Chapter 2.</p> <p>In consultation with the Recreation and Amenity Section and the Biodiversity Officer, it is their advice that this RA zoning should be retained and that due to the expanding population in the city, existing amenities and green spaces will be under considerable pressure. They state that the carpark area could be readily renovated to provide space amenity and biodiversity i.e. space for active and passive recreation, community garden, orchard, pocket forest and creation of wildlife corridors to proximal designated sites in accordance with Article 10 of the Habitats Directive.</p>
GLWC-C2-66 Laurence Fox	<p>Rezone 0.75 ha from A to LDR at Ballindooley Castlegar</p> <p>Submission is seeking to rezone from A to LDR to accommodate 2 family homes for landowners children and families, who have strong ties to Castlegar area. Subject lands are zoned agriculture, but have no agricultural qualities as there is little or no soil and bedrock at the surface and has become a dumping ground.</p> <p>The land is also located at tight bend in road along the L-6210 between Ballindooley Cross and Polkeen, Castlegar. The owner is willing to give ownership to GCC over sufficient lands to improve road safety at this corner and along this stretch of roadway.</p>	<p>CE Response</p> <p>The rezoning of this site would run counter to national/regional policy set out in the NPF/RSES which is centred on promoting compact growth supporting the integrated, sequenced and sustainable development of the city and opportunities for reductions in carbon footprint.</p> <p>It would be contrary to the Core Strategy of the plan which is a robust evidenced based strategy for future sustainable development, arrived at following a detailed analysis of population and land use in the city taking into account a range of factors, in particular proximity to public and sustainable transport facilities, accessibility, availability of water and waste water infrastructure, proximity to services and amenities. In accordance with the Core Strategy there is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase up to 2029.</p> <p>The lands are located within a larger tract of A zoned lands in this area and section 5.9 of the draft plan applies. These agricultural lands form part of the unique natural setting, which provides a backdrop to the built environment and perform the function of a green belt. They are a considerable resource in terms of visual amenity and defining the boundary of the city. They are also important for the future strategic needs of the city.</p>

		<p>To allow this rezoning to LDR would represent an uncoordinated piecemeal approach to zoning. It would undermine the entire A zoning of this area and could prejudice the strategic future use of these lands in the longer term. The rezoning of this site to accommodate residential development would constitute an erosion of the rural character and amenity value of these lands and would be in direct conflict with the policies of the plan.</p> <p>The proposed rezoning in conjunction with other proposals for uncoordinated residential zonings undermine the overall settlement strategy in the Plan.</p> <p>This site in particular is wholly unsustainable for LDR use in terms of poor accessibility, the compromised road network and the lack of proximity to the existing public transport networks. It is remote and isolated from the existing water and waste water services. The access road is extremely narrow with little / no capacity for two cars to pass, with no footpaths.</p> <p>The location of the lands north of the N6 GCRR route too would result in uncoordinated development outside of this strategic corridor when there are opportunities for a more sequential co-ordinated and consolidated approach available inside of this line.</p> <p>The recommendation from the OPR is to restrain zoning and that an LDR zoning is unsustainable and not compatible with the compact growth approach. Any rezoning would be contrary to the recommendation of the OPR and would be inconsistent with NPF/RSES objectives in particular NSO1, NPO3 and RPO3.2.</p> <p>It must also be stated that under Chapter 5, limited residential development is open to consideration on A zoned lands to immediate family members, therefore there is no requirement for this rezoning. Irrespective of LDR zoning, any proposed development will be subject to assessment and will be required to meet detailed standards in terms of traffic, effluent treatment, environment design etc.</p>
GLWC-C2-68 Patrick Joe & Phil Kearns	Request for language similar to Site A in Figure 11.22 for LDR site at Circular Road Request to include language for their existing LDR zoned site 0.49 ha with .81 metres of road frontage, similar to 'Site A' language in Figure 11.22. This states "Development on site A (.5 hectares): A maximum of 3 houses (including the existing	CE Response The LDR zoning in the draft plan is recommended to be amended as per the CE recommendation in response to the OPR submission (see CE response to OPR Recommendation No 5). The zoning objective for these lands is proposed as Residential R2- To provide for sensitive residential infill where such infill will not have an impact on the environmental and visual sensitivities in the area, including

	<p>house) shall be open for consideration on this site". This revised zoning would reflect the available level of services that now exists in the area and abutting their site, which they do not feel has been reflected in the current draft plan. A letter of acquisition of lands (for road widening) from GCC was also submitted with the submission, noting that GCC would have regard to overall original size of land for future development purposes.</p>	<p>those in particular the subject of Policy 5.2 and where such infill can be assimilated satisfactorily through design, layout and amenity impact in a manner that does not detract from the character of the area.</p> <p>As per the CE recommendation in response to the OPR recommendation 5, it is proposed to omit Figure 11.21 and the associated text. As stated in the CE response to recommendation 5, sensitive infill can be open for consideration where all relevant environmental sensitivities and other standard development management criteria have been examined.</p> <p>In the event that the amendment to the zoning has been accepted any proposal for infill on this site will be subject to the development management process.</p>
GLWC-C2-70 Musgraves	<p>Rezoning of lands (3.91ha) from 'I' Industrial and 'RA' Natural Heritage, Recreation and Amenity to 'CI' – Commercial Industrial at Musgrave Park, Tuam Rd</p> <p>The site has significant frontage onto the N6 and the R336 and is located on a prominent site on the entry to Galway City from the north. Adjoining land uses adjacent to the site consist of employment lands zoned Light industry and Commercial, Industrial, and Residential. The northern portion of this lot is zoned 'RA'.</p> <p>The site is currently occupied by Musgraves Market Place wholesale outlet.</p> <p>The subject lands benefit from a strategic location in close proximity to N6, leading to the M6 Motorway. The area is well served by public transport with Intercity Buses and Bus Eireann services running along the R336 to the City. Lands to the immediate west of the site The Trappers Inn Site and adjoining site to the east were historically both zoned for 'Industrial' Use, and were re-zoned at material alterations stage of the last plan making process from 'Industrial' to 'Commercial Industrial' in September 2016.</p> <p>The rezoning of the lands will ensure that commercial development is facilitated in accordance with the principles of</p>	<p>CE Response</p> <p>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 CI zoned lands is qualified by demands that are linked to defined population targets. It is considered to rezone industrial zoned lands to more mainstream commercial land would be contrary to the Core Strategy and the economic/retail framework for the city.</p> <p>To rezone these lands 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 floor space like wholesale retailing and warehousing.</p> <p>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 proposal is not justified noting the site is 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.</p> <p>Altering the zoning at this location would not comply with the Retail Strategy for the city which was arrived at following examination of the requirements for existing and future commercial floorspace, and the best locations within the city for such zoning. This strategy has been prepared in line with Ministerial Guidelines and therefore reflects national policy on retailing. The location along</p>

<p>sustainable development and in accordance with the economic development strategy as set out in the Galway City Draft Development Plan 2023 – 2029. A 'CI' zoning objective is more conducive to the optimum use of the lands.</p> <p>The site, in its current format, is significantly underutilised and represents a missed opportunity to capitalise on its strategic location, and it's potential to fulfil a landmark role.</p> <p>Rezoning the lands to 'CI' represents the logical extension and development of the lands in line with the development of the surrounding area.</p> <p>It would facilitate development that integrates into the existing commercial development adjacent to and surrounding the lands and conforms to the established commercial character of the area. Such as zoning would also realign the quantum of employment development in the area and represent a logical extension to the proposed commercial area</p> <p>The rezoning would be compatible with the NPF, RSES and MASP as well as Chapter 6 of the draft plan supporting the role of Galway as a regional city and driver of economic growth in the region.</p> <p>Extension to the Commercial Industrial Zoning Precedent already exists for Commercial Industrial zoned sites, at this location. It is considered that a modest increase to the 'CI' zoning, to extend into our clients site represents an appropriate mechanism to balance the need for commercial development at locations such as this.</p> <p>The site represents an opportunity to create employment development at a preferable location in close proximity to Galway City.</p>	<p>the Tuam road does not generally accord with the retail hierarchy that is District, Neighbourhood 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.</p> <p>To allow for rezoning to commercial land use has no merit, these are sufficient CI zoned lands in this area including the Crown land which are currently being developed. This rezoning could impact the viability of existing commercial, frustrate unfinished schemes advancing further and exacerbate vacancy levels. The submission states that the adjacent lands are zoned CI, it is noted that those lands which were rezoned as part of the review of the current plan have never been developed and are of scale. It will also detract from the role of the city centre and achieving redevelopment of Regeneration and Opportunity sites, all of which will require strong commercial impetus.</p> <p>It is also considered that any rezoning to CI land use is premature pending completion of a retail strategy. Policy 6.11 Retail Strategy requires to review the strategies and policies for retailing following the preparation of a joint retail study with Galway County Council, to ensure sufficient policy support to create a positive framework for continued vitality and investment in the main retail areas especially the Galway MASP and to ensure an informed and consistent approach to policies relating to shared retailing activities in line with national policy. This is envisaged to commence in 2022/2023.</p> <p>The submission also seeks to remove the RA zoning along the boundary of the site with Bóthar na dTréabh. In general, RA lands are a considerable resource for the city in terms of passive recreation and amenity and have significant attributes in terms of climate action supporting carbon sequestration and extensive biodiversity. In particular, in the case of this RA land, its function is to provide an important green buffer zone along these industrial lands and along the Bothar na dTreabh, to provide for biodiversity and ecological linkage and minimise the visual impact along this major access into the city.</p>
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		<p>This particular site supports an ongoing operation, no evidenced based argument has been made to justify consideration of a change in zoning.</p> <p>It is recommended that the land remain zoned I.</p>
GLWC-C2-71 Tommy Kearns	<p>Rezone lands 4.185 ha from A-Agriculture to LDR- Low Density Residential at Circular Road, Upper Dangan</p> <p>The lands are located 350 metres to the west of Circular Rd, approximately 2.5km from the City Centre and to the easterly side, on the inner edge of the existing area of agricultural zoning, on the city side of the N6 GCRR. This location would make it more suitable for residential, rather than agricultural zoning.</p> <p>A small portion of the holding in the NW corner (.0215 ha) will be required for the N6 GCRR..</p> <p>The lands are directly adjacent to the LDR lands zoned at Circular Road and Cuirte Cheirin.</p> <p>Access to the lands are via high quality 10 metre wide road (Kearns Lane) with footpaths and public lighting in place, which also serves Cuirte Cherin and houses and lands of the extended Kearns family. There is also access to municipal sewers, water mains, surface water drains and underground ducting in place for all required services, to allow for LDR capability of these lands to be realised for appropriate housing.</p> <p>The topography of these lands lends itself to low density housing that could be assimilated into the topography of the lands and in keeping with the prevailing pattern, form and density of the residential amenity of the area.</p> <p>Land is no longer used for any beneficial agricultural purposes.</p>	<p>CE Response</p> <p>This submission relates to rezoning of A lands off the circular road and is similar to submission 120 on for rezoning of adjacent lands</p> <p>The rezoning of this bank of land (c4.2 hectares) from Agricultural land use zoning to residential zoned land use would be contrary to the Core Strategy of the plan which is a robust evidenced based strategy for future sustainable development, arrived at following a detailed analysis of population and land use in the city taking into account a range of factors, in particular proximity to public and sustainable transport facilities, accessibility, availability of water and waste water infrastructure, proximity to services and amenities. In accordance with the Core Strategy there is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase up to 2029.</p> <p>The recommendation from the OPR is to restrain zoning and that an LDR zoning is unsustainable and not compatible with the compact growth approach. Any rezoning would be contrary to the recommendation of the OPR and would be inconsistent with NPF/RSES objectives in particular NSO1, NPO3 and RPO3.2. Sufficient lands are available and zoned for development that can meet the housing supply targets as provided for in the Core Strategy.</p> <p>These lands are proximate to the N6GCRR route corridor and partially located within that corridor. As such, the proposed rezoning would conflict with the specific objective for the N6 GCRR. As the N6 GCRR has been approved by An Bord Pleanála, land use objectives should safeguard the scheme corridor free from adverse development that could prejudice its delivery.</p> <p>The proposed rezoning in conjunction with other proposals for uncoordinated residential zonings undermine the overall settlement strategy in the Plan and could prejudice the strategic future optimal use of these lands in the longer term.</p> <p>Within the general area, in accordance with the Core Strategy, there are lands which are zoned and serviced, have the benefit of planning permission and are</p>

	<p>This location for low density housing would provide a choice for those wanting to live in a low density environment in a sustainable manner, adjacent to the existing urban edge and would relieve the demand on more remote areas in the MASP and other County Galway countryside areas.</p> <p>The draft plan has zoned little additional LDR lands over that zoned in the current plan, and there are relatively few low-density residentially-zoned lands remaining available for development in the city.</p> <p>The area has significant amenities nearby and Circular Rd is a feeder cycling route and public transport is accessible at walking distance on either end of Circular Rd. This location is also a convenient walking distance of the national school and local shop at Circular Rd.</p> <p>The rezoning of the submission lands to LDR would represent a natural extension of the existing LDR zoning in the area, adjacent to the existing urban edge, yet also close to the city centre and other facilities.</p>	<p>ready for development. These existing zoned lands are deemed sufficient to meet the needs for future population in this area within the period of this plan.</p>
GLWC-C2-75 Conor Molloy	<p>Rezone – Relates to Zoning Objective LAP for Ardaun to LDR</p> <p>Submission requests to change 1.179 ha from "Zoning Objective LAP- Local Area Plan for Ardaun to Low Density Residential as an extension of the existing Coolagh Village to accommodate 4 family homes for his children, who all currently live in rented accommodation.</p>	<p>CE Response</p> <p>This submission relates to lands within the Ardaun Local Area Plan 2018-2024.</p> <p>Because this is an adopted statutory plan there is no statutory capacity for consideration of this submission. Such consideration can only be accommodated under the auspices of the LAP review which is due in 2023.</p>
GLWC-C2-77 Cairn PLC	<p>Rezone 2.842 ha of land from Agricultural (A) to Residential (R) at Rahoon</p> <p>Submission is concerned that insufficient land (that is serviced and readily capable of facilitating development) has been</p>	<p>CE Response</p> <p>The rezoning of this bank of land (c.2.8 hectares) from Agricultural land use zoning to residential zoned land use would run counter to national/regional policy set out in the NPF/RSES which is centred on promoting compact growth supporting the integrated, sequenced and sustainable development of the city. It would also be contrary to national policy in the NPF which seeks to reduce our</p>

	<p>allocated to facilitate residential development over the course of the life of the Draft GCDP.</p> <p>Requests that Galway City Council consider allocating additional sites for residential development during the lifetime of the plan, in accordance with the policy on 'Additional Provision' set out in the DDPGs. This will mitigate the risks of housing supply deficiencies in the event tier 2 zoned lands do not come on stream over the course of the CDP</p> <p>This submission requests that Cairn's lands designated for 'Agricultural' development (which extends to circa 2.6 hectares), are rezoned for 'Residential' development under the proposed GCDP.</p> <p>The lands zoned for 'Residential' in the eastern portion of the landholding are to be the subject of a Strategic Housing Development planning application. Cairn is committed to delivering high-quality housing in Galway over the life of the proposed GCDP and in the event that the adjacent SHD scheme is granted permission, will have a construction team in place to commence building in the short term.</p> <p>It is noted that the distribution of population and housing targets to the various settlements in the settlement hierarchy will require a rigorous, evidence-based assessment. This submission contends that the proposed subject lands perform very well when assessed against the 'Settlement Capacity Audit' (SCA) criteria provided for in the Draft Development Plan Guidelines for Planning Authorities (2021).</p>	<p>carbon footprint and integrate climate change mitigation and adaptation into planning policy (NPO54).</p> <p>To rezone these lands would be contrary to the Core Strategy of the plan which is a robust evidenced based strategy for future sustainable development, arrived at following a detailed analysis of population and land use in the city taking into account a range of factors, in particular proximity to public and sustainable transport facilities, accessibility, availability of water and waste water infrastructure, proximity to services and amenities. In accordance with the Core Strategy there is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase up to 2029. The Core Strategy includes for the additional provision as set out in the draft development plan guidelines.</p> <p>The proposed rezoning in conjunction with other proposals for uncoordinated residential zonings undermine the overall settlement strategy in the Plan and could prejudice the strategic future optimal use of these lands in the longer term. Sufficient lands are available and zoned for development that can meet the housing supply targets as provided for in the Core Strategy.</p> <p>Any rezoning would be contrary to the recommendation of the OPR and would be inconsistent with NPF/RSES objectives in particular NSO1, NPO3 and RPO3.2.</p> <p>A large portion of these lands are located within the N6GCRR route corridor. As such, the proposed rezoning would conflict with the specific objective for the N6 GCRR. As the N6 GCRR has been approved by An Bord Pleanala, land use objectives should safeguard the scheme corridor free from adverse development that could prejudice its delivery.</p> <p>Within the general area, in accordance with the Core Strategy, there are lands which are zoned and serviced, and are enabled for development.</p>
GLWC-C2-89 K King Construction	<p>Rezone entrance (.001 ha) to lands off the Western Distributor Road from 'Recreational and Amenity' to 'Residential'</p> <p>Submission relates to entrance to 5.64 ha of land to the north of Kingston Rd and south of the Western Distributor Rd and the Altan Apartment Development. The majority of the site is</p>	<p>CE Response</p> <p>This access is the main vehicular access currently servicing a large bank of R zoned lands in single ownership which was brought to our attention also as part of pre- planning consultation.</p> <p>The zoning of this entrance is RA and is an existing hard surfaced access.</p>

	<p>zoned residential in the draft plan, but there appears to be an anomaly, whereby the existing vehicular access point in the north-western corner of the corner of the subject land is zoned 'Recreational and Amenity'. It is requested that this piece is amended and rezoned 'Residential'.</p>	<p>In consultation with Recreation and Amenity Section, this portion of land is not deemed to be of strategic value and will not compromise the RA network in the city.</p> <p>In this regard, it is recommended that the zoning be changed from RA to R land use to enable access to residential zoned lands.</p> <p>CE Recommendation</p> <p>Change zoning of lands (.001 ha) off the Western Distributor Road from Recreational and Amenity RA land use zoning to Residential R land use zoning.</p> 
GLWC-C2-93 Michael McGreal	<p>In support of Zone Change in Draft Plan for .037 ha site from 'I' to 'CI' for lands at Monivea Rd and Ballybrit Business Park for uniform zoning on site (removed from Map)</p> <p>Submission welcomes the amended land use zoning set out in the Draft Galway City Development plan 2023-2029 which provides for 'CI Enterprise, Light Industry and Commercial' across the entirety of the site and request that this zoning is</p>	<p>CE Response</p> <p>Submission supports CI zoning on site along Monivea Road. This is noted.</p>

	Incorporated into the adopted Galway City Development Plan 2023-2029.	
GLWC-C2-99 FRANCIS O'BRIEN	<p>Rezone land (.559 ha) from RA to R at Newcastle</p> <p>Lands are located with a mature residential area and have access to existing services and amenities in the immediate vicinity.</p> <p>Land would be suitable to address housing shortages and would help alleviate the current housing crisis.</p> <p>Would meet the sequential approach to zoning land.</p> <p>Lands are bordered by open space, owned by the Council and other residential development. Site at present is disused and somewhat unkempt.</p> <p>These RA lands are underutilised as all residential developments turn their back on it. Residential Development here would overlook the Council owned Open Space</p> <p>A Map, indicating 'Map A' was also submitted with the map showing right of way to these lands.</p> <p>Lands are fully accessible, serviceable and located in the suburbs of Galway, making it ideal for infill development.</p>	<p>CE Response</p> <p>No change is recommended in the zoning of these lands. This 0.6 ha plot forms part of a larger bank of RA lands at this location adjacent to existing residential areas. These RA lands are a valuable asset for the city providing green space within neighbourhoods and enabling sustainable recreation and amenity opportunities and are part of the overall green network of the city. It is an objective of the development plan to retain all RA zoned lands.</p> <p>The location of these lands adjacent to public open space means that it is a considerable asset as a bank of RA land. The Recreation and Amenity section of the city council have been consulted and they strongly recommend that the zoning be retained at this time and should remain available for recreation, amenity and biodiversity purposes. It is also justified for retention under the Recreation and Amenity Needs Study and open space needs will be considered as part of the Greenspaces Strategy.</p> <p>In accordance with the Core Strategy there is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase up to 2029. The proposed rezoning in conjunction with other proposals for uncoordinated residential zonings undermine the overall settlement strategy in the plan.</p> <p>It should also be noted that this particular land, located to the rear of existing development is challenged by access being a landlocked site. The access is indicated as a right of way and is substandard and is not designed as an access into a residential development.</p>
GLWC-C2-101 Michael Kelly	<p>Rezone .588 ha from Agricultural to either Low Density Residential or High Density Residential at Castlegar Village</p> <p>The subject plot of land is situated adjacent to existing High Density Residential zoned lands to the south. It is requested that the planning authority should consider the submission to change the zoning for this 0.590 hectares site from Agriculture to either Low Density Residential or High Density Residential</p>	<p>CE Response</p> <p>To rezone these lands would be contrary to the Core Strategy of the plan which is a robust evidenced based strategy for future sustainable development, arrived at following a detailed analysis of population and land use in the city taking into account a range of factors, in particular proximity to public and sustainable transport facilities, accessibility, availability of water and waste water infrastructure, proximity to services and amenities. In accordance with the Core</p>

	<p>as an extension to the existing zoned lands at Castlegar Village to accommodate two family homes for the applicant's nephews/nieces or to accommodate a more serviceable residential development design for existing zoned lands.</p>	<p>Strategy there is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase up to 2029. Within the general area, in accordance with the Core Strategy, there are lands which are zoned and serviced. These existing zoned lands are deemed sufficient to meet the needs for future population in this area within the period of this plan. Any rezoning would be contrary to the recommendation of the OPR and would be inconsistent with NPF/RSES objectives in particular NSO1, NPO3 and RPO3.2.</p> <p>In general, agricultural lands form part of the unique natural setting, which provides a backdrop to the built environment.</p> <p>The proposed rezoning in conjunction with other proposals for uncoordinated residential zonings undermine the overall settlement strategy in the Plan. The proposed rezoning could also prejudice the strategic future optimal use of these lands in the longer term.</p> <p>It must also be stated that under Chapter 5, limited residential development is open to consideration on A zoned lands to immediate family members, therefore there is no requirement for this rezoning. Irrespective of LDR zoning, any proposed development will be subject to assessment and will be required to meet detailed standards in terms of traffic, effluent treatment, environment design etc.</p>
GLWC-C2-103 McHugh Property Holdings	<p>Rezone 10.694 ha from 'Low Density Residential' to 'Residential' at Coolagh.</p> <p>The subject site is located at Coolagh, adjacent to the Coolagh Road. The subject lands as identified in the Draft Plan as 'LDR Coolagh' and are 10.694 hectares in area. Residential developments are located to the south-east and south west of the subject site, including Scellig Árd and Tornog to the south east and Crestwood and Carrig Bán to the south west and west.</p> <p>The site is well served in terms of access and connectivity including a pedestrian network and public transport services within 1km. .</p> <p>The southern boundary of the site bounded by road of the Carrig Bán residential development which joins the Coolagh</p>	<p>CE Response</p> <p>In accordance with the Core Strategy there is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase up to 2029.</p> <p>Within the general area, in accordance with the Core Strategy, there are lands which are zoned and serviced. These existing zoned lands are deemed sufficient to meet the needs for future population in this area within the period of this plan. Any rezoning would be contrary to the recommendation of the OPR and would be inconsistent with NPF/RSES objectives in particular NSO1, NPO3 and RPO3.2.</p> <p>The proposed rezoning runs counter to the existing settlement pattern in the area and to the optimal sequencing of development approach being peripheral to the main residential areas of the city.</p>

<p>Road. It is understood that this access road is public and taken in charge by the Local Authority. The subject lands could be accessed via the Carrig Bán development in future.</p> <p>The site is in close proximity to the City Centre, 1.5km to the N6 Quincentennial Bridge, 2.5km to National University of Ireland Galway and 3.8km to Galway city Centre. The site is also connected to the Dublin M6 motorway via N67 Bothar na dTreabh (1.4km).</p> <p>The subject site is located in a strategic location within the Outer Suburb of Menlough, in an area of existing residential development to the south (Carrig Bán) and north (Coolagh Village).</p> <p>A higher density development would comply with the Sustainable Urban Housing: Design Standards or New Apartments Guidelines for Planning Authorities, 2018.</p> <p>The LDR zoning should be discouraged in the interests of land efficiency, particularly on sites in excess of 0.5 hectares in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009).</p> <p>It is considered that a change in zoning to 'Residential' will provide consistency across local and national policy, and that this proposed change in zoning is compliant with the existing national policies with regard to density.</p> <p>The subject site extends to an area of approximately 10.3 hectares and has the capacity to assist Galway City Council in meeting the housing requirements for Galway as outlined in the Core Strategy of the Draft Plan. It is considered that there is an obvious and identifiable need for lands to be zoned for residential development at appropriate locations such as the subject site.</p>	<p>It represents an uncoordinated piecemeal approach to zoning. These lands which are of a significant scale being almost 11 hectares are wholly unsustainable for R zoning. They are landlocked with no access to the public road, are unserviced and are at a remove from the existing public transport networks and are located within an environmentally sensitive context. More suitable accessible lands are available and zoned for development.</p> <p>It is noted that the OPR specifically requests the omission of these lands as LDR. This is one of a number of such requests. On review of these requests for omission of LDR lands, it is considered that the subject lands should change to an Agriculture land use zoning. It is considered that the lands which are of significant scale and which are at a location beyond the built up area of the city where there is a deficiency in services should not be zoned for development during the period of this plan. The landlocked nature of this site also raises issues for the delivery of an appropriate access to serve future development.</p> <p>(See response to OPR Recommendation 1-4 and 5).</p>
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	The site presents a good opportunity for the development of a high-quality sustainable neighbourhood in line with the Galway City Development Plan Core Strategy.	
GLWC-C2-105 Billy Lawless	<p>Rezone land (0.160 ha) from G- Agriculture and High Amenity to LDR- Low Density Residential at Menlo.</p> <p>Request to (1) Extend the “Village Envelope” of Menlo, to include the subject lands. (2) Rezone the subject lands from 'G' - 'Agricultural & High Amenity", to 'LDR'- 'Low Density Residential'</p> <p>The requested zoning is required to facilitate the immediate housing needs of the Lawless family, whose family home is located alongside.</p> <p>The subject lands (c.0.174ha) are located within Menlo. The western part of the site is currently occupied by a detached dormer dwellinghouse, whilst the eastern part of the site remains undeveloped.</p> <p>The subject lands are surrounded by a cluster of rural dwellinghouses and outbuildings to the north, north-east, east and southeast. The undeveloped eastern part of the site can be described as a rural infill site.</p> <p>The Inner Galway Bay SPA does not encroach onto the subject site.</p> <p>The submission requests to allow for a single detached house, can be developed without adversely affecting the integrity of environmental designations in the area.</p> <p>It should be noted that the subject site is located outside of any indicative future flood risk designations. In this regard, we refer to the most to date CFRAM flood maps.</p> <p>The undeveloped southern corner of the site can be described as a rural infill site.</p>	<p>CE Response</p> <p>The proposal to extend the LDR zoning outside the village envelope of Menlough is not deemed appropriate. The existing village envelope reflects the historic form of the village. The definition of the village was arrived at following an assessment of the historic pattern of development which was a traditional clachan type settlement. The extension of the village and the rezoning of the subject land to LDR to accommodate an additional dwelling would constitute haphazard development, would dilute the character of Menlo village and would further diminish the G zoned lands in this area which are a valuable asset to the city. The draft plan in Chapter 3 and Policy 3.9 Village Envelopes/Areas seeks to strengthen and protect the character of the village, to maintain the established character of the traditional settlement. It is not deemed necessary to include the existing dwelling within the LDR zone, as stated in the submission this is classed as a non-conforming use.</p> <p>The proposal to extend the LDR zoning would erode the character of the village and would also erode the rural character of this hinterland of the city. To allow for small pockets of development such as this has the consequent effect of eroding the definition of Menlough village boundaries and runs counter to protecting and preserving the distinctive village character.</p> <p>To allow LDR rezoning would also run counter to national/regional policy set out in the NPF/RSES which is centred on promoting compact growth supporting the integrated, sequenced and sustainable development of the city. It would also be contrary to national policy in the NPF which seeks to reduce our carbon footprint and integrate climate change mitigation and adaptation into planning policy (NPO54).</p> <p>The recommendation from the OPR is to restrain zoning and that an LDR zoning is unsustainable and not compatible with the compact growth approach. Any rezoning would be contrary to the recommendation of the OPR.</p> <p>These lands in particular are wholly unsustainable for LDR being at a remove from waste water services and the lack of proximity to the existing public</p>

	<p>Requests inclusion of the subject site within the Village Envelope of Menlo.</p>	<p>transport networks. These lands are also in close proximity to the designated Lough Corrib Special Protection Area. These lands also perform an amenity function providing a buffer between the village and Lough Corrib and backdrop to the lake.</p> <p>Irrespective of LDR zoning, any proposed development will be subject to assessment and will required to meet detailed standards in terms of traffic, effluent treatment, environment design and all other development management criteria.</p>
GLWC-C2-108 Damian Hanley	<p>Rezoning of land. 300 ha on the Barna Road from Recreation and Amenity 'RA' to Residential 'R' and the inclusion of a new Policy Objective</p> <p>This request seeks to 1) rezone land from a Recreation and Amenity 'RA' use to a Residential 'R' use to allow a residential development on this subject site and 2) a site-specific zoning objective which would identify this site as suitable for dwellings developed by immediate family members of persons who are landowners. The wording of this site-specific policy objective is requested as follows:</p> <p>"RA Lands located adjacent to Barna Woods, as outlined on Figure 4, will be considered by the Council as appropriate for residential dwellings which are proposed by immediate family members of the landowners, where the sylvan character of the area is maintained, where a density of 0.3 ha will be considered".</p> <p>This above site-specific policy objective would be in accordance with the precedents set through the permissions of a number of dwellings in the immediate surrounds and previous site-specific policies included in extant City Development Plan relating to the immediate surrounds of this site.</p>	<p>CE Response</p> <p>In the current plan section 11.2.2 Natural Heritage, Recreation and Amenity RA land use zoning objectives includes Fig 11.1 RA Lands located adjacent to Barna Woods which states that the council will consider the granting of permission for dwellings on a minimum 0.4 hectare site to immediate members of families of persons who are landowners, where the sylvan character of the area is maintained.</p> <p>The council have previously permitted a number of dwellings at a very low density of one house to the acre, in accordance with this objective and which did not have a perceptible impact on the character of this area and could lend itself to be heavily screened.</p> <p>It is considered appropriate to reinsert Fig 11.1 into the draft development plan to allow for consideration of a dwelling house on 0.3 ha. The site size is deemed acceptable and the existing dwelling is connected to the sewer network and an additional house would not be reliant on on-site effluent treatment, located within a cluster of housing and classed as sustainable infill. This is more appropriate than a rezoning to residential which would represent non sequential and piecemeal zoning.</p> <p>It is important to retain the RA zoning reflecting the general character and amenity and natural environment of this area and supporting connectivity in the green network.</p>

<p>The site is located on the edge of the Galway City, approximately 4km west of the centre of Salthill and 1.7km east of Barna village.</p> <p>The subject lands are well served by the existing road network due to the significant population levels in this area, and an existing established access to the site, which serves an existing dwelling on the site.</p> <p>On the purchase of the subject site in 1985, outline permission for two dwellings was granted permission. The dwelling on the east side of the site was built, and outline permission on the west side of the site was renewed every five years until 1999, when it was refused due to a change in zoning.</p> <p>It is felt that although these lands are currently zoned as Recreation and Amenity land, they do not fulfil the objective of this zoning due to the existing residential development which has been granted within the zoned area along with the private nature of this area, which is not open to public access to serve the recreational or amenity needs of the public.</p> <p>These are family lands, within the curtilage of their home, for immediate family members. This type of development would be consistent with local housing need and would be in accordance with the precedent clearly set on the lands in the immediate surrounding area which have been developed on this same 'RA' zoned land over the past 20 years.</p> <p>The land comprises of ancillary existing residential (private open space) land and is not accessible to the public.</p> <p>It is considered that there is a precedent for residential development set on the lands on and around this site, with nine houses situated to the immediate west and north, all of which are located within the same 'RA' zoned area, a number of which have been granted and built with the extant 'RA' zoning in place, and the latest of which was granted planning</p>	<p>CE Recommendation</p> <p>Amend Section 11.2.2 Natural Heritage, Recreation and Amenity RA to include the following specific development objective – text in green</p> <p>RA Lands located adjacent to Bearn Woods. The Council will consider the granting of permission for a dwelling on a minimum 0.3 hectare site to immediate members of families of persons who are landowners, where the sylvan character of the area is maintained. Any permission on this site will be subject to environmental and traffic considerations.</p> 
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	<p>permission in November 2014 (Pl. Ref. 13/351). It is further noted that the extant Galway City Development Plan 2017 – 2023 included a site-specific policy objective which set out the Council would consider residential development of the site on which this latest dwelling (Pl. Ref: 13/351) is located, which is to the immediate west of the subject site (Fig. 11.1 Site at Barna Woods – Galway City Development Plan 2017-2023).</p>	
GLWC-C2-109 City Gateway Ltd	<p>Rezone land (1.285ha) from 'Low Density Residential' to 'Residential' at Bothar na dTreabh</p> <p>The subject site is located in a strategic location within the Outer Suburb of Doughiska. The areas to the north and south of the site are characterised by existing residential development.</p> <p>Rezoning of the subject site to 'Residential' will achieve consistency across local and national planning policy with regard to density at the subject site.</p> <p>The subject site extends to an area of approximately 1.3 hectares and has the capacity to assist Galway City Council in meeting the housing requirements for Galway as outlined in the Core Strategy of the Draft Plan.</p> <p>The subject site is very well served by existing infrastructure in the surrounding area including road connectivity, pedestrian and cycle infrastructure, and public transport.</p> <p>There are a wide range of facilities serving the site including healthcare, education, recreation, retail, and transport.</p> <p>There are no apparent planning constraints associated with the subject site; there are no ecological designations directly on the site, no cultural or archaeological sites, no flood zones or recorded flood events, and no concerns with access.</p>	<p>CE Response</p> <p>To rezone these lands from LDR to R land use would be contrary to the Core Strategy of the plan which is a robust evidenced based strategy for future sustainable development, arrived at following a detailed analysis of population and land use in the city taking into account a range of factors, in particular proximity to public and sustainable transport facilities, accessibility, availability of water and waste water infrastructure, proximity to services and amenities.</p> <p>In accordance with the Core Strategy there is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase up to 2029.</p> <p>The site is currently zoned low density residential development which will generate a type of development that is compatible with the adjacent residential development and which can marry in with the mainly attractive landscaped entry to the city along this road.</p> <p>The proposed rezoning runs counter to the existing settlement pattern in the area and to the optimal sequencing of development approach. Within the general area, in accordance with the Core Strategy, there are lands which are zoned for R use which are deemed to be more suitable for R type development than the subject lands. These existing R zoned lands are deemed sufficient to meet the needs for future population in this area within the period of this plan. In particular, the lands at Ardaun in close proximity to the site are designated for residential use and it is a priority to develop these lands which require a critical mass to succeed as a sustainable neighbourhood.</p>

	<p>The ongoing upgrade to the Martin Junction is set to transform the area surrounding the site and will provide a safer pedestrian and cycle network in the area.</p>	<p>Any rezoning would be contrary to the recommendation of the OPR and would be inconsistent with NPF/RSES objectives in particular NSO1, NPO3 and RPO3.2 This site is located at the junction of the Dublin Road and the dual carriageway. It is particularly challenged in terms of access with sole access limited to a narrow section of the site along the northern boundary accessing onto a cul de sac at a point directly adjacent to the dual carriageway and may impact on this strategic road.</p> <p>It is also considered that any rezoning at this location would prejudice the alignment and function of the Dublin Road Bus Corridor which is a public transport project of major strategic importance for the city incorporating bus priority measures on Dublin Road from Moneenageisha to Martin Roundabout, including walking and cycling infrastructure, in accordance with the GTS.</p> <p>A lower density development can support generous boundary landscaping and affords a good amenity approach transitioning into the city.</p>
GLWC-C2-110 Michael Tully	<p>Rezoning of lands (0.8ha) from 'A' Agriculture to 'LDR' Low Density Residential at Spellman's Boreen</p> <p>The subject lands is a 0.8ha greenfield site and is situated immediately north east of Castlegar Village approximately 595m north west of its junction with the N83, c.3.4km north east of Galway City Centre.</p> <p>The immediate area is characterised by one-off residential housing on large plots with apartment blocks located to the south west of the site. The surrounding area to the north west consists of undulating agricultural land'.</p> <p>These lands are unencumbered with no archaeology sites, Natura 2000 sites or flood risk.</p> <p>The planned route for the N6 Galway City Ring Road is located immediately north of the site.</p> <p>Reference is made to NPF national policy objectives that articulate delivering on a compact urban growth programme.</p> <p>Rezoning would help meet housing needs in the city.</p>	<p>CE Response</p> <p>This submission is to rezone lands from A to LDR and are located adjacent to lands which are subject to a request to rezone for R use under submission 126.</p> <p>The proposal to extend the LDR zoning outside the Castlegar village envelope is not deemed appropriate. The existing village envelope reflects the historic form of the village. The definition of the village was arrived at following an assessment of the historic pattern of development which was a traditional clachan type settlement. The extension of the village and the rezoning of the subject land to LDR as proposed would constitute haphazard development, would dilute the character of the village envelope and would further diminish the A zoned lands in this area which are a valuable asset to the city including to accommodate future strategic needs. These lands in particular are at a remove from waste water services and lack proximity to other services and the existing pedestrian and public transport networks.</p> <p>Within the general area, in accordance with the Core Strategy, there are lands which are zoned and serviced, have the benefit of planning permission and are ready for development. These existing zoned lands are deemed sufficient to meet the needs for future population in this area within the period of this plan.</p>

	<p>The subject lands are located in a key area in proximity of Galway City Centre. There is residential development of varying nature and lands zoned for 'R' Residential use in the surrounding area, including Cluain Riocaird development which is located approximately 190m south west of the site, as well as key areas of business and technology at Ballybrit Business Park to the south east and Parkmore Business Park to the east.</p> <p>The subject lands are well serviced, with good connectivity opportunities to the surrounding area, Galway City Centre and the wider countryside of Galway. There is also possible access to the public sewer network via a connection within the existing landholding. The Planned route for the N6 Galway City Ring Road to the north will also increase connectivity opportunities at this site.</p>	<p>It must also be stated that under Chapter 5, limited residential development is open to consideration on A zoned lands to immediate family members, therefore there is no requirement for this rezoning. Irrespective of LDR zoning, any proposed development will be subject to assessment and will required to meet detailed standards in terms of traffic, effluent treatment, environment design etc.</p> <p>To allow LDR rezoning would also run counter to national/regional policy set out in the NPF/RSES which is centred on promoting compact growth supporting the integrated, sequenced and sustainable development of the city. It would also be contrary to national policy in the NPF which seeks to reduce our carbon footprint and integrate climate change mitigation and adaptation into planning policy (NPO54).</p> <p>The recommendation from the OPR is to restrain zoning and that an LDR zoning is unsustainable and not compatible with the compact growth approach. Any rezoning would be contrary to the recommendation of the OPR and would be inconsistent with NPF/RSES objectives in particular NSO1, NPO3 and RPO3.2.</p>
GLWC-C2-111 Mary Loughman	<p>Rezone the subject lands (0.367 ha) from 'RA' – 'Recreation & Amenity' to 'LDR' – Low Density Residential at Circular Rd., Upper Dangan and removal of protected view</p> <p>The subject lands comprise a total of 0.367 hectares and are situated along the eastern edge of Circular road. The site consists of a split level detached dwellinghouse and an underutilised large garden area, which is surplus to requirements.</p> <p>The lands are zoned "RA- Recreation & Amenity". These lands currently form the curtilage of a private residence and are not utilised nor are they available for public recreation/open space/amenity purposes. The lands have the benefit of c.75m of road frontage, with an established vehicular access/driveway which has the potential to be shared.</p>	<p>CE Response</p> <p>The subject site is an existing residential site on lands zoned for RA use along the circular road.</p> <p>A change to LDR zoning would not be appropriate and would constitute piecemeal zoning. With regard to the RA zoning, it is considered that while there are residential dwellings within this band of RA along the Circular road, these could be considered as non-conforming uses within the RA zone. It is important to retain the RA zoning reflecting the general character and amenity and natural environment along this side of the road, supporting connectivity in the green network and for protection and enhancement of the designated view along this road.</p> <p>A critical aspect along circular road is the designated protected view - V1 Panoramic views of the city and the River Corrib from Circular Road. This view is a high quality view across the city and this site is within this view. Any additional development on this site would detract from this view.</p>

	<p>The topography of the site falls sharply from west to east, from the edge of the Circular road to the rear of the site.</p> <p>LDR zoning at this location would be in keeping with the existing character of the area. The consideration of infill development on smaller sites has been permitted by the Planning Authority in the area. Reference is made to Pl. Ref. No. 11/252 on the site across the road to the west which permitted higher density infill. In response, given that the "infill" part of the site has potential for a single dwellinghouse to connect to the public sewer, and given the fact that the front of the subject site has already been removed to make way for a public footpath and public lighting, the potential for an infill dwellinghouse could be considered on a similar basis on the subject site.</p> <p>Policy context is referenced, in particular the Sustainable Residential Development in Urban Areas which acknowledge the need to provide for low density housing as a more sustainable alternative to sporadic urban generated one-off housing in the open countryside.</p> <p>It is acknowledged that any development at this location should incorporate best principles in terms of assimilation into the landscape. There is an opportunity to accommodate a single low profile low impact dwellinghouse on these lands, working with the existing contours to integrate successfully into the landscape.</p> <p>Requests removal of protected view as this view is significantly compromised along the road frontage of the subject lands by reason of long-established roadside vegetation and roadside wall.</p>	
GLWC-C2-112 Michael Tully	LDR zoned lands at Castlegar - request for specific objective for site as stated in Figure 11.28 to be removed and removal of the protected view fronting the site.	<p>CE Response</p> <p>Figure 11.28 of the draft plan states that development shall be restricted to three houses only, reserved for the use of immediate family members of the landowner.</p>

	<p>The subject lands are 4.01ha of greenfield land and is situated north of Castlegar Village, 915m north west of its junction with the N83, c.3.7km north east of Galway City Centre.</p> <p>Site is currently zoned LDR with a specific development objective to restrict development to three houses only, reserved for the use of immediate family members of the landowner -Figure 11.28 LDR Castlegar Road.</p> <p>Request is to have this specific language removed from this LDR zoned land. Submission references policies from the NPF relating to need to zone more land at appropriate densities.</p> <p>Submission notes that there are no archaeology sites on the subject lands, no Natura 2000 sites, no Flood Risks on the site.</p> <p>N6 planned route to the south of the site will increase connectivity opportunities and alter the character of the area</p> <p>Lands are well serviced and located in key area, within close proximity to the city, nearby Business parks and other residential areas</p> <p>Requests removal of protected view.</p>	<p>It also requires that any development shall be consistent with the N6 GCRR Strategic Road. This objective was inserted in 2016 during the preparation of the current plan 2017-2023 when the lands were rezoned from A to LDR. The justification for the rezoning at that time was that this land would meet the needs of family members and this was reflected in the specific objective.</p> <p>These lands are unserviced and it would not be appropriate to change the density on this site. The OPR specifically references this site and requests its omission as LDR.</p> <p>In this regard, it is noted that these lands are peripheral and non-sequential, however, there is justification for retention of this land use based on its location within the community. It is considered, given that there will be displacement of homes in this area due to the reservation/approval of the strategic route, that this may present opportunities to retain a cohesive community by offering similar type housing opportunities.</p> <p>With regard to the protected view, it is considered that given the scale of the lands that there is capacity through good design and layout to assimilate into the landscape such that there would not be a detrimental impact on the value of the protected view. No change is recommended</p>
GLWC-C2-114 Labhaoise Hutchinson	<p>Rezone land (.35 ha) from 'G' Agriculture and High Amenity to Low Density Residential 'LDR'</p> <p>The subject site located in Quarry Road, Menlo, Galway and measures approximately 0.35ha, located within a larger 0.97ha site. It is 400m to the east of Menlough village located approximately 250m outside the village boundary. The site is well connected to Menlo village via the Quarry Road, and well suited to provide low density housing, with the surrounding neighbouring land consisting of one-off dwellings. The lands</p>	<p>CE Response</p> <p>Development on this site would result in a reduction of amenity and agricultural zoned land adjacent to Lough Corrib, facilitating unserviced development outside the designated village of Menlo.</p> <p>This site is located just outside the village envelope of Menlo. To rezone it to for LDR use would constitute haphazard development, extending ribbon development out along this road from the village, would dilute the character of Menlo and would further diminish the G zoned lands in this area.</p>

	<p>are currently greenfield and undeveloped apart from some agriculture buildings to the rear of the field.</p> <p>In the Draft Galway City Development Plan 2023-2029, the area zoned LDR on Quarry Road, closest to the subject site appears to have previously been rezoned from Agriculture 'G' to 'LDR'. In addition, as illustrated on Figure 3 below, the lands on Coolagh Road (as illustrated on Fig. 11.31), which are close in proximity to the subject site, has also been rezoned from Agriculture 'G' to 'LDR'.</p> <p>Requests that the land subject to this submission is rezoned to Low Density Residential 'LDR', with a specific policy or development objective which permits the development of a single dwelling by the landowner or immediate family members.</p> <p>Figure 11.32 LDR North of Quarry Road, Menlough- "Development shall be restricted to one house only, reserved for the use of immediate family members of the landowner".</p>	<p>These G zoned lands are a considerable resource for the city in terms of recreation and amenity and they form part of the unique natural setting, which provides a backdrop to the built environment. These lands also have significant attributes in terms of climate action supporting carbon sequestration and extensive biodiversity and form part of the greenbelt between the City and the County. The distinction of the G zoning objective is that G zoned lands are predominately in agricultural use but also have an important natural environment and landscape value, which distinguishes them from less visually sensitive and amenity rich agricultural lands.</p> <p>It is considered that if permitted, residential development in this location would adversely impact on the rural character and scenic amenity of the area and the unique landscape and environment of this part of the city on the lakeward side of Quarry Road. To rezone this or to allow development of these lands would undermine the entire zoning of this area and would create a precedent for further development and further erode the character of the area.</p> <p>The recommendation from the OPR is to restrain zoning and that an LDR zoning is unsustainable and not compatible with the compact growth approach. Any rezoning would be contrary to the recommendation of the OPR and would be inconsistent with NPF/RSES objectives in particular NSO1, NPO3 and RPO3.2.</p>
GLWC-C2-115 Shane O' Connor	<p>Amend the Specific Development Objective with respect to LDR lands (0.382 ha) at the junction of Gentian Hill - Section 11.2.8 (mapped)</p> <p>The subject lands are located along the south side of the Knocknacarra/Barna road, to the east of the junction with Gentian Hill.</p> <p>Section 11.2.8 states "LDR lands at the junction of Gentian Hill. Development on these lands shall not exceed a density of 13 houses per hectare and shall be restricted to single storey dwellings."</p> <p>Request that the Specific Development Objective is amended.</p> <p>This Specific Objective has been in place on the subject lands since c.2005. Since this time numerous permissions have</p>	<p>CE Response</p> <p>The subject lands are located along the south side of the Knocknacarra/Barna road, to the east of the junction with Gentian Hill and are located within a protected seascape view along this road (V5).</p> <p>Chapter 11 Section 11.2.8 states "LDR lands at the junction of Gentian Hill. Development on these lands shall not exceed a density of 13 houses per hectare and shall be restricted to single storey dwellings."</p> <p>These lands have largely been built out. The applicants request for a dwelling house is considered acceptable in principle and in accordance with the LDR objective. At issue is the location of the protected view fronting the site and the current specific objective to restrict any development to single storey.</p> <p>As the submission states there is planning history on this site and planning</p>

<p>been granted on site (with habitable accommodation over 2 levels). Furthermore, a single dwelling house is currently under construction on the eastern part of the zone. The remaining lands to the west have the benefit of planning permission but remain undeveloped to date. As such, it is considered that the LDR objective should be updated to match the updated planning context of the site.</p> <p>It is proposed to amalgamate 2 no. sites on the lands to provide for a single dwelling house. Pl. Ref. No. 21/128 (ABP 311918-21) refers- refused by reason of the house not being single storey.</p> <p>It is of critical importance to note that the Board essentially refused permission because the Specific Development Objective for the lands refers to a Single Storey restriction.</p> <p>It is noted that the Planning Inspector stated that "the restriction is somewhat unwarranted it is accepted that it has been established that the dwelling height, mass and form would not have adverse visual impacts or negative effects on the amenities and characteristics at this sensitive location." Therefore, we would agree with the Inspector that the "Single Storey" Specific Objective restriction is unwarranted. We request that this restriction is omitted as part of the 2023-2029 CDP.</p> <p>However, in the interest of respecting the "Protected View" from the Public road at this location and respecting the extant planning permissions on site, it is proposed that the ridge height of the dwellinghouse on site should not exceed the ridge height of the permissions granted under Pl. Ref. No.'s 16/240 & 19/377 at this location. Therefore, it is requested that the Specific Development Objective for the LDR lands at this location is amended as follows;</p> <p>"LDR lands at the junction of Gentian Hill. These lands are partially developed. A single house on the remaining LDR</p>	<p>21/128 was refused due to the proposal not being single storey. It is noted that the site falls away from the road and that there may be scope to achieve greater than single storey on the site without going higher than the existing development granted permission and impacting on the view. It is reasonable to restrict the height of the dwelling house as opposed to the number of storeys. In this regard it is recommended that the specific objective be amended to omit the limit of single storey and instead to limit the height of any proposed development such that it would not exceed the height of adjacent developments granted permission. This would allow for some flexibility in the design of a dwelling at this location ensuring that any development is compatible with Policy 5.7 Community Spaces: Protected Views of Special Amenity Value to protect views of special amenity value and interest.</p> <p>CE Recommendation</p> <p>Amend Section 11.2.8 Residential R and Low Density Residential LDR Land Use Zoning Objectives to include the following specific development objective – text in green as follows:</p> <p>LDR Residential R2 lands at the junction of Gentian Hill. Development on these lands shall not exceed a density of 13 houses per hectare and shall be restricted to single storey dwellings. One house only shall be open to consideration on the remainder of the undeveloped lands. The design of the development shall have a low profile ridge line which shall not exceed the ridge height of the adjoining development to the east.</p>
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	land will be considered. The House Design shall have a low-profile ridge line which shall not exceed the ridge height of the permissions granted under PI Ref. No.'s 16/240 & 19/377."	
GLWC-C2-116 Tommy O'Brien	<p>Rezone lands (.383 ha) from "I" to "CI" at WellPark Rd.</p> <p>The subject lands are located at an inner suburban location to the east of the City, between the northern edge of the Wellpark road and the southern edge of the IDA owned - Galway Mervue Business & Technology Park. The subject lands consist of the assembled sites at Wellpark road amounting to an overall site area of c.5,187 sq.m.</p> <p>11.2.6 of the Draft CDP provides "specific development objectives for a number of CI zones throughout the city."</p> <p>In relation to the subject lands it provides that "CI lands at Wellpark Road adjacent to the Mervue Business and Technology Park. A residential content of up to 75% will be considered on these lands".</p> <p>This submission requests that this Specific Development Objective is amended to state;</p> <p>CI lands at Wellpark Road adjacent to the Mervue Business and Technology Park. A residential content of up to 100% and a General Maximum Plot Ratio of 1:1.75 will be considered on these lands".</p> <p>The requested amendment to allow for up to 100% Residential Content and a higher Plot Ratio on this brownfield and infill site, will allow for greater land use flexibility, and accords with National & Regional Planning Policy as well as the overarching planning principles as set out in the Draft CDP.</p> <p>Submission is also seeking to amend the CI Specific Development Objective at Wellpark, to consider 100%</p>	<p>CE Response</p> <p>No change is recommended in the zoning or objectives for this site. The CI zoning and specific objective to allow a residential content of up to 75% to be considered on these lands was inserted into the current plan following a rezoning from R to CI. Following on from this a planning permission for a 4-6 storey office development was granted (18/271). This is still a valid permission which allows for redevelopment at generous density and provides for a layout that incorporates these lands as associated open space flanking the entrance to Mervue Industrial Estate. Having regard to the location of the site long the main Monivea road, adjacent to the IDA industrial estate and opposite Cluain Mhuire, it is considered that the existing specific objective is merited to facilitate the potential for a mixed use residential development.</p> <p>It is not considered appropriate to rezone the section of the site which is zoned I for CI use.</p> <p>This portion of land is indicated in recent planning drawings as being in the ownership of the IDA (19/143) and comprises an integral part of the IDA estate. It currently provides an attractive landscaped entrance into the estate with high quality public realm, green space and a number of mature trees which provide a natural setting to the estate.</p> <p>This portion of ground has a different character to the existing CI zoned lands. It is important to retain this landscaped area which defines the quality of the overall estate. The quality of this spaces contributes to placemaking which is recognised in national economic policy as being essential to economic development.</p>

	<p>Residential Content and to consider a “General Maximum” Plot Ratio of 1.75:1.</p> <p>Submission also seeks inclusion as a Regeneration and Opportunity site.</p>	
GLWC-C2-117 Kulling Properties Ltd	<p>Rezone land (1.80 ha) from A to R at Ballindooley</p> <p>The submission provides a framework in which development can occur at Ballindooley. It provides an outline and flexible overview for the development potential of the lands. It illustrates the long-term potential and identifies a planned development taking into consideration matters relating to public realm, services, connectivity, and urban design.</p> <p>The site is strategically located in close proximity to the N6 GCRR, which has great potential to transform the area upon completion.</p> <p>The site takes full advantage of existing pedestrian and public transport facilities, which connect the site to various services within the city.</p> <p>With good quality, innovative and dynamic design, this site should deliver an attractive development for people of various family types to live.</p>	<p>CE Response</p> <p>The rezoning of these lands is not recommended. It would run counter to national/regional policy set out in the NPF/RSES which is centred on promoting compact growth supporting the integrated, sequenced and sustainable development of the city and opportunities for reductions in carbon footprint.</p> <p>To rezone these lands would be contrary to the Core Strategy of the plan which is a robust evidenced based strategy for future sustainable development, arrived at following a detailed analysis of population and land use in the city taking into account a range of factors, in particular proximity to public and sustainable transport facilities, accessibility, availability of water and waste water infrastructure, proximity to services and amenities. In accordance with the Core Strategy there is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase up to 2029.</p> <p>The proposed rezoning runs counter to the existing settlement pattern in the area and to the optimal sequencing of development. It represents an uncoordinated piecemeal approach to zoning on lands located beyond the built up area and the N6 route. These lands in particular are wholly unsustainable for R zoning being unserviced, at a remove from services and from the existing public transport and pedestrian networks. The rezoning of this land would have serious transport implications being located along the national route and would conflict with national policy with regard to safeguarding the capacity of these routes. It is also close to the junction of the approved N6GCRR and could compromise the delivery of this strategic route.</p> <p>The rezoning of these lands would also be contrary S28 guidelines on access to National Primary Routes being located along the N84.</p> <p>The lands (1.8ha) are located within a larger tract of A zoned lands in this area and section 5.9 of the draft plan applies. These agricultural lands form part of the unique natural setting, which provides a backdrop to the built environment and</p>

		<p>perform the function of a green belt. They are a considerable resource in terms of visual amenity and defining the boundary of the city.</p> <p>The rezoning of this land to accommodate residential development would constitute an erosion of the rural character and amenity value of these lands and would be in direct conflict with the policies of the plan. It would undermine the entire A zoning of this area and could prejudice the strategic future use of these lands in the longer term.</p> <p>Any rezoning would be contrary to the recommendation of the OPR and would be inconsistent with NPF/RSES objectives in particular NSO1, NPO3 and RPO3.2.</p>
GLWC-C2-120 Ross Tobin	<p>Rezone land (3.16 ha) from 'Agriculture' to 'Low Density Residential' at Barnacranny and Dangan Upper, Circular Road</p> <p>The subject site is located adjacent to the built-up area including existing low density residential development. Therefore, the pattern of exiting residential development is well established. These lands present an opportunity to extend the already established pattern of low-density residential development on serviced land.</p> <p>The subject site is located within a strategic location in the built-up area of Galway City and approximately 3.3 km west of the city centre.</p> <p>The subject site extends to an area of 3.16 hectares and has the capacity to assist Galway City Council in meeting the housing requirements for Galway as outlined in the Core Strategy.</p> <p>The subject site is very well served by existing infrastructure in the surrounding area including roads, pedestrian links, and water infrastructure.</p> <p>The proposal for low density residential zoning at the subject site will assist Galway City Council in achieving the housing targets as outlined in the Core Strategy, and will contribute to</p>	<p>CE Response</p> <p>This submission relates to rezoning of A lands off the Circular Road and is similar to submission 71 on for rezoning of adjacent lands. This rezoning is not recommended.</p> <p>The rezoning of this bank of land (c3.16 hectares) from Agricultural land use zoning to residential zoned land use would run counter to national/regional policy set out in the NPF/RSES which is centred on promoting compact growth supporting the integrated, sequenced and sustainable development of the city. It would also be contrary to national policy in the NPF which seeks to reduce our carbon footprint and integrate climate change mitigation and adaptation into planning policy (NPO54).</p> <p>To rezone these lands would be contrary to the Core Strategy of the plan which is a robust evidenced based strategy for future sustainable development, arrived at following a detailed analysis of population and land use in the city taking into account a range of factors, in particular proximity to public and sustainable transport facilities, accessibility, availability of water and waste water infrastructure, proximity to services and amenities. In accordance with the Core Strategy there is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase up to 2029.</p> <p>The recommendation from the OPR is to restrain zoning and that an LDR zoning is unsustainable and not compatible with the compact growth approach. Any rezoning would be contrary to the recommendation of the OPR and would be inconsistent with NPF/RSES objectives in particular NSO1, NPO3 and RPO3.2</p>

	<p>the achievement of a mix of house types throughout the city area.</p> <p>There are no apparent planning constraints associated with the subject site; there are no ecological designations directly on the site, no cultural or archaeological sites, no flood zones or recorded flood events, no prospects or views, and no concerns with access.</p> <p>The recently permitted Galway City Ring Road (ABP 302848-19) will act as a development boundary to the city, these lands are located inside the Ring Road and therefore strategically located for future development.</p>	<p>These lands are proximate to the N6 GCRR route corridor and partially located within that corridor. As such, the proposed rezoning would conflict with the specific objective for the N6 GCRR. As the N6 GCRR has been approved by An Bord Pleanala, land use objectives should safeguard the scheme corridor free from adverse development that could prejudice its delivery.</p> <p>The proposed rezoning in conjunction with other proposals for uncoordinated residential zonings undermine the overall settlement strategy in the plan and could prejudice the strategic future optimal use of these lands in the longer term.</p> <p>Within the general area, in accordance with the Core Strategy, there are lands which are zoned and serviced, have the benefit of planning permission and are ready for development. These existing zoned lands are deemed sufficient to meet the needs for future population in this area within the period of this plan.</p>
GLWC-C2-122 Sean Noone	<p>Rezone land (1.365 ha) from LDR 'Low Density Residential' to 'Residential' 'R in Curragreen- Figure 11.10</p> <p>Requests the rezoning of a 1.365 ha from 'Low Density Residential' (LDR) to Residential (R). The lands are located in Curragreen, on a site positioned to the north of the R338 and south of the railway line.</p> <p>A site-specific objective for the subject lands is provided in Figure 11.10 'Curragreen LDR' which states the lands shall generally have a maximum density of 5 houses to the hectare</p> <p>In terms of policy support, Section 6.2.3 'Sequential Approach to Zoning for Residential Development' of the Draft Development Plan Guidelines for Planning Authorities (August 2021) is quoted. Its states that: 'The spatial pattern of the growth of settlements, often along radial access routes, characterised by ribbon and low density development, has served to 'lock-in' extremely high levels of car dependence and render settlements too spread out and incoherent to comfortably get around on foot or by bicycle'.</p>	<p>CE Response</p> <p>The draft plan includes Figure 11.10 'Curragreen LDR' which states the lands shall generally have a maximum density of 5 houses to the hectare. The site is part of these lands.</p> <p>In accordance with the Core Strategy there is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase up to 2029.</p> <p>The proposed rezoning to R use runs counter to the existing settlement pattern in the area and to the optimal sequencing of development. It represents an uncoordinated piecemeal approach to the R zoning in this area. In addition there are servicing issues associated with these lands which would not be compatible with a higher density development.</p> <p>The OPR specifically references Figure 11.10 'Curragreen LDR' and requests its omission as LDR.</p> <p>In this regard, it is noted that these lands are peripheral, however, there is justification for retention of this land based on the pattern of development in this area. This is the remaining site within the Curragreen LDR lands and can be considered as infill development. Notwithstanding the LDR zoning, any proposed</p>

	<p>National Strategic Outcome 1 of the National Planning Framework is 'Compact Growth'. The NPF advocates for compact growth policy at national, regional and local level to ensure a more sustainable future for our settlements and for our communities. At regional planning policy level, the extant Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly (RSES) also states that:</p> <p>'Compact growth will be pursued to ensure sustainable growth of more compact urban and rural settlements, supported by jobs, houses, services and amenities, rather than continued sprawl and unplanned, uneconomic growth'.</p> <p>Further to the drive to ensure 'Compact Growth' at national and regional planning policy level, this submission requests the rezoning of the 'Low Density Residential' (LDR) parcel of land located in Curragreen, to the north of the R338 and south of the railway line, to be rezoned for Residential 'R' use.</p>	<p>development will be subject to assessment and will required to meet detailed standards in terms of traffic, effluent treatment, environment, design etc. (see response to OPR Recommendations 1-4 and 5)</p>
GLWC-C2-126 Michael Kelly	<p>Rezone 1.365 ha from A to R at Castlegar</p> <p>The purpose of this submission is to change the zoning of the subject site from Agricultural to High Density Residential so as to increase the potential of existing residentially zoned lands and to allow for road widening of the existing School Road under any potential development of such lands.</p> <p>As the plot of land also borders High Residentially Zoned Lands directly across the public roadway, School Road, to the East, it may be of benefit to Galway City Council to re-zone the plot to High Residential so as to allow for road widening of the existing roadway and to accommodate a more serviceable Residential Development design for existing zoned lands.</p> <p>As the subject plot of land is situated adjacent to existing High Density Residential zoned lands we respectfully request for this and the aforesaid reasons that the planning authority should consider the submission from the applicant, Michael</p>	<p>CE Response</p> <p>This submission is to rezone lands from A to R and are located adjacent to lands which are subject to a request to rezone to LDR under submission 110. This rezoning is not recommended.</p> <p>To allow R rezoning would run counter to national/regional policy set out in the NPF/RSES which is centred on promoting compact growth supporting the integrated, sequenced and sustainable development of the city. It would also be contrary to national policy in the NPF which seeks to reduce our carbon footprint and integrate climate change mitigation and adaptation into planning policy (NPO54).</p> <p>These lands in particular are unsustainable for rezoning to R being at a remove from waste water services and lack proximity to other services and the existing pedestrian and public transport networks.</p> <p>The proposed rezoning runs counter to the existing settlement pattern in the area and to the optimal sequencing of development. It represents an uncoordinated piecemeal approach to zoning. The proposed rezoning in conjunction with other</p>

	<p>Kelly, to change the zoning of Folio: GY19563, Plan 131 measuring 1.3549 hectares in area: from "Agriculture to High Density Residential as an extension to the existing zoned lands at Castlegar Village so as to accommodate a more serviceable Residential Development design for existing zoned lands.</p>	<p>proposals for uncoordinated residential zonings undermine the overall settlement strategy in the Plan.</p> <p>The proposal to extend the development zoning outside the Castlegar village envelope is not deemed appropriate. The existing village envelope reflects the historic form of the village. The definition of the village was arrived at following an assessment of the historic pattern of development which was a traditional clachan type settlement. The extension of the village and the rezoning of the subject land to R as proposed would constitute haphazard development, would dilute the character of the village envelope and would further diminish the A zoned lands in this area which are a valuable asset to the city including to accommodate future strategic needs.</p> <p>Within the general area, in accordance with the Core Strategy, there are lands which are zoned and serviced and are deemed sufficient to meet the needs for future population in this area within the period of this plan.</p> <p>Any rezoning would be contrary to the recommendation of the OPR and would be inconsistent with NPF/RSES objectives in particular NSO1, NPO3 and RPO3.2.</p> <p>It is noted that under Chapter 5 in relation to Agriculture lands, that a limited residential development is permitted in certain circumstances.</p>
GLWC-C2-127 Roselyn Carroll	<p>Dyke Road Car Park - Rezone from CI to CF</p> <p>Rezone Car Park and Black Box lands from CI to CF to make provision of much-needed purpose-built amenities and resources for the community from childcare, Centre for Music with Concert Hall, Centre for Arts.</p> <p>Ensure that plans for regeneration of Headford Road Sites includes provision for community amenities - Childcare, Schools, Playground, meeting spaces</p>	<p>CE Response</p> <p>It is not recommended to rezone the Dyke Road Car Park from CI to CF. The draft plan outlines in Chapter 10 section 10.7 in relation to the car park regeneration that this is a site that will be redeveloped as an LDA project. It further states that uses other than housing may include civic, cultural and arts infrastructure. The draft plan includes an objective to prepare a local area plan for the Headford road area as outlined in section 10.7. This plan will set out the need and location for a range of community and amenity facilities in this area. It will encourage a diversity of uses to sustain an animated and vibrant public realm of streets and urban spaces. The Plan will reflect the unique character and culture of Galway and acknowledge the dynamism of this urban area.</p>
GLWC-C2-131 Teal Investments Ltd	<p>Retain the existing zoning for (CI) 'Enterprise, Light Industry, and Commercial' on a site(.89ha) at Sandy Road</p>	<p>CE Response</p> <p>This submission is noted and has no objection to the current CI zoning of the site and recognizes that the adjacent lands at Sandy Road will be the subject of</p>

	<p>The site is a brownfield site and is currently in use as a carpark and for commercial storage.</p> <p>This submission welcomes CI zoning on the subject site. The subject site is located within a strategic location within close proximity of Terryland Retail Park and Liosban Industrial Estate.</p> <p>The area at Sandy Road will be the subject of significant development proposals throughout the lifetime of the forthcoming Galway City Development Plan 2023-2029, and the subject site has great potential to be developed for commercial use which will be complimentary to its surrounding area.</p>	<p>significant development proposals by the LDA and that the subject site has great potential to be developed for commercial use which will be complimentary to its surrounding area.</p>
GLWC-C2-133 Liam Dilleen	<p>Rezone land (1.67 ha) from G to LDR at Roscam & include site in Village Boundary</p> <p>Remove designated view</p> <p>Submission is seeking the inclusion of his land (1.67 ha) within the LDR Roscam Village boundary (Figure 11.14 LDR Roscam Village- p.287) and change in zoning of the subject lands from 'Agriculture & High Amenity' to 'Low Density Residential.'</p> <p>The lands are a short distance to the south-west of Roscam village on the south-eastern edge of the city. The subject site essentially represents an infill site as there are houses on both sides to the north and south.</p> <p>The site is contiguous to lands zoned LDR in an area identified as 'Roscam Village' in the draft plan. The adjacent site to the south has also been zoned LDR.</p> <p>The zoning of the subject lands for LDR and its inclusion with the 'Roscam Village' area boundary will consolidate the existing pattern of development in the area, will help increase</p>	<p>CE Response</p> <p>The rezoning of this site from G land use zoning to LDR land use zoning is not recommended. It would run counter to national/regional policy set out in the NPF/RSES which is centred on promoting compact growth supporting the integrated, sequenced and sustainable development of the city. It would also be contrary to national policy in the NPF which seeks to reduce our carbon footprint and integrate climate change mitigation and adaptation into planning policy (NPO54).</p> <p>To rezone these lands would be contrary to the Core Strategy of the plan which is a robust evidenced based strategy for future sustainable development, arrived at following a detailed analysis of population and land use in the city taking into account a range of factors, in particular proximity to public and sustainable transport facilities, accessibility, availability of water and waste water infrastructure, proximity to services and amenities. In accordance with the Core Strategy there is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase up to 2029.</p> <p>Any rezoning would be contrary to the recommendation of the OPR and would be inconsistent with NPF/RSES objectives in particular NSO1, NPO3 and RPO3.2</p>

	<p>the provision of housing within the built-up area of the city and will increase the variety of house types available.</p> <p>The subject site is in close proximity to the facilities and services in Roscam village and Doughiska to the north and Galway City Centre to the west.</p> <p>The subject site is in close proximity to public transport links to the north (500m)</p> <p>It is envisaged that it will be feasible to connect the site to sewage infrastructure in the near future as it is in close proximity to large residential developments that are under construction and permitted to the north of the site.</p> <p>Any development proposals at the site will be designed in response to a full ecological and environmental assessment of the site and any existing features such as hedgerows and stone walls will be maintained.</p> <p>Any development proposals will take full cognisance of the protected structure and national monument to the south and will not impact on their visual setting or integrity.</p> <p>The zoning of this land complies national guidelines, NPF and RSES supporting compact growth.</p> <p>The protected view is obstructed by mature hedgerow and vegetation along the roadside and by the existing dwelling and mature landscaping on the adjacent site to the south.</p>	<p>The proposed rezoning represents an uncoordinated piecemeal approach to zoning being at a remove from services and remove from the existing public transport and pedestrian networks.</p> <p>These G zoned lands are a considerable resource for the city in terms of recreation and amenity and they form part of the unique natural setting, which provides a backdrop to the built environment. These lands also have significant attributes in terms of climate action supporting carbon sequestration and extensive biodiversity and form part of the greenbelt between the City and the County. The distinction of the G zoning objective is that G zoned lands are predominately in agricultural use but also have an important natural environment and landscape value, which distinguishes them from less visually sensitive and amenity rich agricultural lands.</p> <p>It is considered that if permitted, residential development in this location would adversely impact on the rural character and scenic amenity of the area and the unique landscape and environment of this part of the city. These lands are located within a larger tract of G zoned lands forming a buffer between the built up area and the coastline and should be retained. There are also concerns with regard to the proximity of this site to the coastline and potential impact on the ecological sensitivities of the coastline that would arise.</p> <p>The submission requests the removal of a protected view. This is not recommended. This designated View no. 9 is a panoramic protected view from V.9 Views towards the sea at Roscam. In this regard, the proposal for rezoning would conflict with Policy 5.7 Community Spaces: Protected Views of Special Amenity Value with regard to protecting designated views of special amenity value.</p> <p>It is recommended that the existing G zoning be retained.</p>
GLWC-C2-136 Conor Coyne	<p>Rezone site (0.97ha) from G to LDR at Roscam</p> <p>Request to rezone from Agriculture & High Amenity to Low Density Residential for family members.</p>	<p>CE Response</p> <p>The rezoning of this backland site from G land use zoning to LDR zoned land use zoning is not recommended. It would run counter to national/regional policy set out in the NPF/RSES which is centred on promoting compact growth supporting the integrated, sequenced and sustainable development of the city. It would also be contrary to national policy in the NPF which seeks to reduce our carbon</p>

	<p>footprint and integrate climate change mitigation and adaptation into planning policy (NPO54).</p> <p>To rezone these lands would be contrary to the Core Strategy of the plan which is a robust evidenced based strategy for future sustainable development, arrived at following a detailed analysis of population and land use in the city taking into account a range of factors, in particular proximity to public and sustainable transport facilities, accessibility, availability of water and waste water infrastructure, proximity to services and amenities. In accordance with the Core Strategy there is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase up to 2029.</p> <p>Any rezoning would be contrary to the recommendation of the OPR and would be inconsistent with NPF/RSES objectives in particular NSO1, NPO3 and RPO3.2.</p> <p>The proposed rezoning represents an uncoordinated piecemeal approach to zoning being at a remove from services and remove from the existing public transport and pedestrian networks.</p> <p>These G zoned lands are a considerable resource for the city in terms of recreation and amenity and they form part of the unique natural setting, which provides a backdrop to the built environment. These lands also have significant attributes in terms of climate action supporting carbon sequestration and extensive biodiversity and form part of the greenbelt between the City and the County. The distinction of the G zoning objective is that G zoned lands are predominately in agricultural use but also have an important natural environment and landscape value, which distinguishes them from less visually sensitive and amenity rich agricultural lands.</p> <p>It is considered that if permitted, residential development in this location would adversely impact on the rural character, and scenic amenity of the area and the unique landscape and environment of this part of the city. These lands are located within a larger tract of G zoned lands forming a buffer between the built up area and the coastline and should be retained. There are also concerns with regard to the proximity of this site to the coastline and potential impact on the ecological sensitivities of the coastline that would arise.</p> <p>It is recommended that the existing G zoning be retained.</p>
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GLWC-C2-137 GPT Plant and Tool Hire	<p>Specific Objective that allows car parking only on this parcel of RA zoned land at GPT Industrial Estate Tuam Rd</p> <p>To allow a specific objective to facilitate car parking on land zoned for (RA) Recreational & Amenity on a site located at the GPT Industrial Estate Tuam Road, Galway.</p> <p>The existing operation on the Tuam Road is constrained particularly in order to facilitate car parking for staff and customers. The access arrangement serving the existing industrial estate is in need of upgrade and improvement. In order to improve the existing access and internal roads serving the industrial estate a loss of car parking for staff and customers would be a necessity.</p> <p>The subject site has been zoned RA, but no Recreational activity has been carried out on the site or indeed in close proximity. The subject site has been filled over the years with some inert material and can be described as obsolete in terms of any recreational or amenity use.</p> <p>This submission requests that Galway City Council include a specific objective that allows car parking only on this parcel of RA zoned land. This objective will facilitate regularising and upgrade of existing entrance and internal roads in the Industrial Estate thus enabling no net loss in car parking for customers and staff.</p> <p>The proposed objective may read as follows:</p> <p>"RA lands adjacent to the GPT Industrial Estate Tuam Road, Galway. The Council will consider car parking on these lands where it is shown that the open space is obsolete and where the recreational requirements and residential amenity are not prejudiced"</p> <p>The request of this submission is to consider a specific objective for these RA zoned lands to enable future business</p>	<p>CE Response</p> <p>These lands are part of the designated Terryland City Park located within the Terryland river valley. These RA lands are a valuable asset for the city in terms of enabling sustainable recreation and amenity opportunities and have significant attributes in terms of climate action supporting carbon sequestration and biodiversity and are part of the overall green network of the city. It is an objective of the development plan to retain all RA zoned lands.</p> <p>In particular, in the case of this RA land, its function is to provide an important green buffer zone along the Terryland River and function as a natural floodplain and to provide for biodiversity and ecological linkage. Policy 5.8 includes to enhance and restore biodiversity aligning with national policy to support climate action and to address reductions in biodiversity. Given the proximity of this site to the Terryland River and Coopers Cave, it is considered inappropriate to consider these RA lands for parking of vehicles of the nature proposed.</p> <p>In consultation with the Recreation and Amenity section, they indicate that the use of these lands for parking would be incompatible with recreation and amenity objectives. This site could be readily rehabilitated to provide amenity and biodiversity i.e. space for passive recreation, urban farming (allotments, community garden, orchard), pocket forest (climate action) and creation of wildlife corridors to proximal designated sites in accordance with Article 10 of the Habitats Directive.</p> <p>The long term objective is to acquire and develop RA lands as part of the Terryland City Park.</p>
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	growth and in particular access and internal road improvements.	
GLWC-C2-139 Eamonn Hogan	<p>Request for Land to be rezoned from LDR to A at Roscam</p> <p>These lands were zoned LDR prematurely, i.e. prior to access to public services and infrastructures and will continue to be in use for farming. Request that the zoning be changed to Zoning A, Agriculture.</p>	<p>CE Response</p> <p>It would not be appropriate to rezone these lands for A use. This would constitute a piecemeal uncoordinated zoning. The lands in this area are zoned both LDR as part of the overall settlement area of Roscam or G having regard to the unique amenity landscape in this area providing a buffer between Roscam and the coastline.</p> <p>These LDR lands have been re-examined in the context of the strategic development strategy for the city and are considered appropriate having regard to the established residential pattern, the existing settlement area and the landscape of the area. These lands in conjunction with a number of other sites are contiguous to existing dwellings and comprise infill.</p> <p>It is considered appropriate to retain the LDR zoning subject to the specific development objectives outlined in Chapter 11. It should be noted that there is no obligation on the landowner to develop these lands. (See Response to OPR Recommendation 1-4 and 5)</p>
GLWC-C2-142 Green Way Estates (Leitrim) Limited	<p>'CI' lands at Monivea Road (Radharc na Greine Site) - Amendment to site-specific zoning objective</p> <p>It is noted that the Draft City Development proposes to zone these lands (0.25 ha) 'CI - Commercial/Industrial' with a specific development objective as follows: 'CI zoned lands on Monivea Road (Radharc na Greine site). Residential development on the full extent of this CI zoned site will be considered. The density of any residential development on this site will have regard to the surrounding context.'</p> <p>The existing pattern of development is characterised by low density suburban type residential development comprising the established neighbourhood of Mervue. More recently, on the lands immediately adjoining the subject site, a residential development has been completed (Pl. Ref.No: 16/332 & ABP:</p>	<p>CE Response</p> <p>This is a small portion of land located along the Monivea Road fronting the Radharc na Greine housing development. The existing specific objective for this site set out in Section 11.2.6 is that residential development on the full extent of this CI zoned site will be considered and that the density of any residential development on this site will have regard to the surrounding context.</p> <p>This is considered reasonable having regard to the context, surrounded by the existing Radharc na Greine development. It is considered that the density should align with this existing development. It is a residual piece of land which was part of the overall land bank and should be designed to assimilate with existing development to achieve the best urban design resolution. This would accord with the section 28 guidelines for Sustainable Residential development in urban areas and with the draft plan policy with regard to sustainable neighbourhoods and urban design.</p>

<p>248815) and this has a density of approximately 33 no. units per hectare.</p> <p>The surrounding context of the subject site also includes the Crowne Square Development which includes for 345 no. residential units equating to a residential density of approximately 172 no. units per hectare.</p> <p>There is an emerging character of development emerging along this particular corridor of the Monivea Road which comprises significant height and density and there exists an opportunity to consolidate this on the southern side of the road in terms of the subject site.</p> <p>Requests that the site-specific zoning objective for the subject lands to be altered as follows:</p> <p>'CI zoned lands on Monivea Road (Radharc na Greine site). Residential development on the full extent of this CI zoned site will be considered. The density of any residential development on this site will have regard to the surrounding context. Appropriate density on the subject lands shall be determined in accordance with the provisions of the Design Standards for New Apartments 2018'</p> <p>Amend the Development Guidance Section of the Draft Urban Density and Building Heights Study (Section 18.3 – North and East) is amended as follows:</p> <p>'Between 2 - 3 storey within the established suburbs, rising to between 2 - 4 storey at key community centres and nodes. Heights along key corridors such as the Dublin Road, and other areas earmarked for major change such as Sandy Road are less sensitive and could rise above these levels where justified.'</p> <p>Similarly, within the Crown Square site where major regeneration is occurring, there is scope for greater height as demonstrated in emerging developments. Development lands</p>	<p>To allow consideration of a height and density similar to what has been achieved on the Crown site would not be appropriate by virtue of the small scale of the site and its location in an established residential development.</p> <p>With regard to the Urban Density and Building Height Study, it used a structured evidenced based methodology to arrive at a selection of sites for suitability for height. This site was not one of the sites selected. This study is a standalone completed document which was prepared to inform the draft plan.</p>
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	<p>In immediate proximity to the Crown Square site (including Radharc na Greine lands) may also be able to accommodate greater height subject to compliance with relevant development management standards and the principles of proper planning and sustainable development'.</p>	
GLWC-C2-149 McGrath King	<p>Rezoning of 4 sites from LDR to R, totaling 2.75 Ha at Circular Road - Figure 11.22</p> <p>Submission seeks to rezone 4 separate sites labelled A-D on submitted map from Low Density Residential (LDR) to Residential (R) located at the south-western end of the Circular Road, where it intersects with the Letteragh Road. These sites border the fringe of Established Suburbs and Outer Suburbs of the City Development Plan. Site A = 1.02 Ha, Site B=0.61 Ha, Site C=0.93 Ha and Site D =0.17Ha. These lands are a mix of farmlands, single dwelling house sites, and are significantly encircled with newly developed R Zoned Lands, a public park and roadway.</p> <p>Figure 11.22 LDR at Circular Road (page 289) shows the specific development objectives for these LDR lands. While the snippet from the development management map shows recent developments. At this time, planning permission has been granted for 8 units in total over Sites A and B (Plan Ref: 19/33) exercising the maximum number of units at the LDR zoning, but not commenced.</p> <p>Water Services There is available fresh water supply, and foul water disposal via the public mains. These items were explored in our application 19/33 and found to have higher capacity than the LDR density utilised in that application.</p> <p>A higher density zoning also makes more viable all public transport, pedestrian ways/ cycle ways generally for this neighbourhood and would make use of attractive views.</p> <p>It is suggested that the lands identified in this submission as Sites A, B, C and D can make a much greater contribution to</p>	<p>CE Response</p> <p>In accordance with the Core Strategy there is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase up to 2029. The proposal would represent an uncoordinated approach to zoning. The proposed zoning would allow for much higher density than just infill development. These lands are not part of the Core Strategy which is a robust evidenced based strategy for future sustainable development, arrived at following a detailed analysis of population and land use in the city taking into account a range of factors, in particular proximity to public and sustainable transport facilities, accessibility, availability of water and waste water infrastructure, proximity to services and amenities.</p> <p>Within the general area, in accordance with the Core Strategy, there are lands which are zoned and serviced, have the benefit of planning permission and are ready for development. These existing zoned lands are deemed sufficient to meet the needs for future population in this area within the period of this plan.</p> <p>It is the recommendation of the OPR not to increase residential zoning during the period of this plan. There may be a case that these lands will be included in the Core Strategy of the next development plan cycle to meet the needs of the population beyond 2029.</p>

	<p>the City's needs if rezoned to a higher density of Residential. The greater the density at these sites, with careful design, can provide the occupants of homes here with special views and aspect over the City and the Bay, and with infrastructure and amenity.</p>	
GLWC-C2-156 Lidl Ireland GMBH	<p>Doughiska Rd. Lidl Site- rezone to C/I from Residential</p> <p>The proposed preservation of the existing Residential zoning objective is noted. Given the extant use, and the designation of this area as a Neighbourhood Centre (boundaries undefined), the more appropriate zoning objective would be Commercial/Industrial / C/I, to reflect the current use and to facilitate consolidation or incremental growth in the area.</p> <p>The adjoining undeveloped lands to the rear / East and South have the potential to be consolidated and enhanced for the benefit of the area in general, whilst maintaining relevant open space and buffer areas to residential development, the National Road corridor and the proposed intersection of East-West and North-South greenways.</p>	<p>CE Response</p> <p>It is considered that the existing residential zoning on this site is acceptable. R zoning does not exclude non-residential development as evidenced by the grant of permission for the current development. The R zoning objective allows for associated support development which would contribute to sustainable residential neighbourhoods. It does not inhibit the commercial viability on the site.</p> <p>A CI zoning is not warranted on this site. An adequate supply of CI zoned lands is available to meet the commercial needs of the Doughiska area in accordance with the retail strategy. No change of zoning is recommended.</p> <p>It is also considered that any rezoning to CI land use is premature pending completion of a retail strategy. Policy 6.11 Retail Strategy requires to review the strategies and policies for retailing following the preparation of a joint retail study with Galway County Council, to ensure sufficient policy support to create a positive framework for continued vitality and investment in the main retail areas especially the Galway MASP and to ensure an informed and consistent approach to policies relating to shared retailing activities in line with national policy. This is envisaged to commence in 2022/2023.</p>
GLWC-C2-159 Denise Hincks O'Brien	<p>Rezone 'I' Industrial Zoned Site (.05ha) to 'CI' Commercial Industrial at 39 Wellpark Rd.</p> <p>Rezone 'I' Industrial Zoned Site to 'CI' Commercial Industrial at 39 Wellpark Rd. Submission contests that the site is more appropriate for Commerical/Industrial Development than for private dwelling.</p> <p>Site was originally part of the IDA Galway Industrial Estate now known as the IDA Galway Mervue Business and Technology Park. The site was acquired from the IDA and permission granted to applicants to build house in 1978-</p>	<p>CE Response</p> <p>It is not considered appropriate to rezone this site from I to CI land use zoning. This I zoned site is part of a bank of I zoned lands at this location allied to the lands that make up the IDA industrial estate at Mervue.</p> <p>The existing residential use of the site can be classed as a non-conforming use and the I zoning allows for flexibility of use for I purposes. The location of the site has a better relationship with the I zoned lands than with the CI lands located to the south with the potential in the longer term for greater integration with the existing I zoned lands. No change in zoning is recommended.</p>

	<p>78/125. House is completely surrounded by both industrial and commercial/ industrial zoned lands now and is "out of sync" with other residential dwellings.</p> <p>The site is more appropriate for Commercial/Industrial Development. Submission states that the family's privacy and quality of life and basic standard of living is seriously. Negatively compromised by being isolated and sandwiched between an array of substantial industrial and commercial developments.</p>	
GLWC-C2-161 Alber Developments	<p>Specific Objective for Rosshill/Roscam Pitch and Putt and adjacent LDR lands (13.53 Ha)</p> <p>Submission is requesting that the Draft Plan is amended as follows:</p> <p>The specific development objectives attached to the wider Rosshill/Roscam Pitch and Putt and adjacent lands as set out in the Draft Plan are amended with the removal of the plot ratio constraint of 0.2:1. This requires to be replaced with a flexible, appropriate density range in the region of 35-50 units per hectare which accords with not only national and regional planning policy and guidance, but takes account of the permitted Rosshill Manor SHD (ABP ref: 310797-21).</p> <p>The removal of "environmental sensitivities" from the LDR Zoning Objective as it appears throughout the Plan</p> <p>The removal of "environmental vulnerability and limited services capacity" as it appears in Policy 3.8-Low Density Residential Areas</p> <p>The Outer Suburbs as illustrated (Figure 11.32- Neighbourhood Areas) and described within the Draft Plan be amended to include the subject lands at Rosshill. This position was accepted by the Council and Board in the course of the SHD application.</p>	<p>CE Response</p> <p>These lands have the benefit of planning permission for residential development approved by An Bord Pleanala. It is noted that this approved development is currently subject to judicial review proceedings and therefore it is considered inappropriate to make any amendments to the substantive objectives for this site at this stage.</p> <p>(See CE Response to OPR Recommendation 1-4 and 5)</p>

	The Draft Plan be amended to reflect fully the housing demand forecast as set out in the Housing Strategy and Housing Need and Demands Assessment (HSHNDA) which calls for the delivery of 707 units per year over the Plan period.	
GLWC-C2-163 Thos McDonogh & Sons Ltd.	In Support of Rezoning lands(7.161 ha) as proposed 'I – Enterprise, Industry and Related' in Draft Plan at Knocknacarra District Centre The subject lands are located to the north of the Knocknacarra District Centre and adjoin the Rahoon Road, extending to approximately 7.4 hectares in area. The submission welcomes the I zoning on these lands.	CE Response This submission welcomes the I zoning of these lands which is noted and welcome.
GLWC-C2-164 (A) Envirobead Ltd and Ballindooley Developments Ltd	Rezone lands (3.83 ha) from 'A - Agricultural' to 'CI - Commercial and Industrial' at Coolagh Site A forms part of a larger area which comprises a former quarry. While quarrying activities have ceased on these lands, the lands are still in use as a depot and storage facility and distribution continues from the site. The site benefits from existing access infrastructure and there are existing commercial building/structures existing on the site. The zoning objective for this site in the Draft plan Agricultural (A). Given the history of the subject lands and their ongoing commercial use it is considered that the Agricultural (A) zoning is not appropriate. This land use zoning would also preclude any future development proposals which may be commercial/enterprise in nature and are not specifically related to agricultural activities. For these reasons it is considered that the subject lands would benefit from a 'CI - Commercial and Industrial' land use zoning which would facilitate enterprise, light industry and/or other commercial uses on the site in future.	CE Response No change in zoning is recommended. 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 CI zoned lands is qualified by demands that are linked to defined population targets. It is considered to rezone these lands to commercial land use would be contrary to the Core Strategy. The lands are located within the N6 GCRR route corridor and the proposed rezoning would conflict with the specific objective for the N6 GCRR and the associated CPO process. As the N6 GCRR has been approved by An Bord Pleanala, land use objectives should safeguard the scheme corridor free from adverse development that could prejudice its delivery. Altering the zoning at this location would not comply with the Retail Strategy for the city which was arrived at following examination of the requirements for existing and future commercial floorspace, and the best locations within the city for such zoning. 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

		<p>city will get a more proportionate geographical spread and of critical importance, public transportation investment can achieve maximized efficiencies.</p> <p>The rezoning of this site to commercial land use would be unsustainable and contrary to the proper planning and development of the area. The road network in this area would not have the capacity to accommodate the intensification of use that would arise from a CI land use. Such a CI use would be piecemeal and uncoordinated and would not be compatible with the established uses in this area and would impact on the character of the area. This area lacks essential services to accommodate a commercial land use at this location.</p>
GLWC-C2-164 (B) Envirobead Ltd and Ballindooley Developments Ltd	<p>Rezone lands (4.06 ha) at Ballinfoile from 'A' Agricultural and 'G' Agricultural and High Amenity' to 'Residential'</p> <p>The lands identified as Site B of the submission are located in the northern outer suburb of Ballinfoile. The site is bounded to the east by the N84 Headford Road. A portion of this land has been zoned Residential which reflects the location and context of the site and its general suitability for residential development. The subject site also benefits from proximity to infrastructure and community and amenity facilities, and the zoning of the lands would accord with the Core Strategy of the Draft Plan in terms of housing, transport and sustainable development.</p> <p>Section 11.2.8 of the Draft Plan describes the specific objectives of the lands west of Headford Road. The remainder of the subject site is zoned as 'Agriculture (A)' and 'Agriculture and High Amenity (G)'. The extension of the existing land use zoning to include the entirety of the lands outlined in red above would facilitate the provision of a suitable sized development site which could in future facilitate a high-quality residential development.</p>	<p>CE Response</p> <p>In accordance with the Core Strategy there is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase up to 2029.</p> <p>These lands are not part of the Core Strategy which is a robust evidenced based strategy for future sustainable development, arrived at following a detailed analysis of population and land use in the city taking into account a range of factors, in particular proximity to public and sustainable transport facilities, accessibility, availability of water and waste water infrastructure, proximity to services and amenities.</p> <p>Within the general area, in accordance with the Core Strategy, there are lands which are zoned and serviced and are enabled for development. These existing zoned lands are deemed sufficient to meet the needs for future population in this area within the period of this plan.</p> <p>Any rezoning would be contrary to the recommendation of the OPR and would be inconsistent with NPF/RSES objectives in particular NSO1, NPO3 and RPO3.2</p> <p>The proposed rezoning of A and G zoned lands runs counter to the existing residential land use pattern in the area to the optimal sequencing of development. It represents an uncoordinated piecemeal approach to zoning on lands which reflects the topography of the area and the natural environment and high amenity</p>

		<p>landscape of this area. It would compromise the band of G zoned lands at this location.</p> <p>The rezoning of this land to accommodate residential development would constitute an erosion of the rural character and amenity value of these lands and would be in direct conflict with the policies of the plan. It would undermine the entire A zoning of this area and could prejudice the strategic future use of these lands in the longer term. A specific development objective in Figure 11.3 sets out specific requirements for the residential lands at this location and includes that any development shall assimilate into the topography of the site and shall not break the ridgeline. The proposed rezoning for R land use would conflict with this specific objective.</p> <p>The rezoning of these lands would also be contrary S28 guidelines with seek to safeguard the carrying capacity of national primary routes being located along the N84.</p> <p>No rezoning is recommended.</p>
GLWC-C2-181 Eir	<p>Rezone lands (1.78 ha) from 'I' (Industrial) to 'CI' (Enterprise, Light Industry and Commercial) at Monivea Rd, Mervue</p> <p>Rezone from Zoning Objective I to Zoning Objective CI (Enterprise, Light Industry and Commercial) and extend the Specific Objective – ‘Regeneration and Opportunity Site’ (Crown Square) to include the subject site (approximately 1.1ha in extent) (Also amend Figure 10.9 to be consistent).</p> <p>Eircom operates a telephone exchange and associated telecommunications infrastructure on a site of approximately 2.65 ha on Monivea Road, Mervue. The site also accommodates two multi-storey office buildings constructed in the late 1970s that are no longer fit for modern office use. Following a review of activities, an area of approximately 1.1 ha with frontage to Monivea Road is identified that is no longer required by Eircom to support and provide telecoms</p>	<p>CE Response</p> <p>It is not recommended to rezone a portion (1.1ha) of the Eircom site along the Monivea road from I to CI land use zoning or to include it as an extension of the existing Crown Regeneration or to attach the proposed specific objective.</p> <p>While it is stated that these are deemed surplus lands, it is considered premature from a planning viewpoint to rezone part of the site where the balance of the site represents an industrial character which may not be compatible with proposed uses which could be supported under the CI zoning/Regeneration site designation.</p> <p>It would not be acceptable to portion off a part of the lands for mixed use development including residential whilst the existing uses are being retained on the balance of the site. The existing industrial uses on the remaining lands would not be conducive to a good residential environment.</p> <p>A blend of new residential development while retaining the existing industrial use and poor quality office development would be contrary to the policies in the plan to develop high quality good design and attractive sustainable development.</p>

	<p>services for the City and region, including that area accommodating the two office blocks.</p> <p>Insert specific development objective for the subject Eircom CI site, as follows: CI zoned lands on Monivea Road (Eircom site adjoining Crown Square). A minimum residential content of at least 50% will be considered on these lands, and Offices and Tourist related uses (including hotel) 1 appropriate to the CC zoning will be open for consideration on these lands.</p>	<p>It is considered that potential change of use of the office buildings would not be sustainable for a residential use as they would not comply with modern standards. The nature of the existing structure does not lend itself to be compatible with a change of use or appropriate for modern residential use. The quality of the surrounding amenity would not lend itself to a sustainable residential development.</p> <p>For currency of the Development Plan 2023-2029, it is considered that the existing Crown Regeneration Site can accommodate a significant development to align with the Core Strategy.</p>
GLWC-C2-182 Reform, Central Policy and Communications Division - Dept. of Transport GLWC-C2-162 HSE	<p>Helicopter Landing Site (HLS)</p> <p>The Dept. of Transport outlines the use of the Helicopter Landing Site (HLS) located at University Hospital Galway (UHG) and recommends that the plan recognises its strategic importance in supporting a wide range of stakeholders and that due consideration is taken of any specific HSE recommendation regarding safety and spatial requirements including simultaneous use by more than one emergency aviation service provider.</p> <p>The HSE advise that in relation to the Air Ambulance service that there is a permanent facility within the UHG campus and an additional facility located on Open Space, to the north-west which is used on a temporary emergency basis at times when the permanent facility is occasionally closed. The HSE request that policy be inserted in the plan to support the need for Air Ambulance services at UHG and MPUH, the continued use of the temporary service in place on amenity lands as necessary and to enter into discussions with the HSE relating to the provision of a single permanent Air Ambulance heliport service at an appropriate location to serve the UHG campus during the plan period.</p>	<p>CE Response</p> <p>The importance of infrastructure to support Air Ambulance services is recognised and the council has facilitated the provision of a temporary facility on open space adjacent to UHG (Part 8 Ref: LA4/2013) and granted planning permission for a permanent facility on the UHG campus.</p> <p>The requirement for such essential infrastructure at UHG and MPUH is considered to be sufficiently supported by Policy 7.8 in relation to support and expansion of healthcare infrastructure.</p> <p>The HSE request in relation to UHG that the use of the temporary service in place on amenity lands continue as necessary. They request that the provision of a single permanent Air Ambulance heliport service at an appropriate location to serve the UHG campus be identified during the plan period.</p> <p>In order to address this issue it is recommended that a specific objective be inserted in Chapter 11 to allow for consideration of a heliport on RA zoned lands.</p> <p>CE Recommendation</p> <p>The following amendment is recommended:</p> <p>Insert in Chapter 11 Section 11.2.2 a Specific Development Objective as follows:</p> <p style="color: green;">RA lands at Shantalla Neighbourhood Park. The Council will consider the development of a portion of these lands for use as a heliport in association with</p>

		<p>the provision of an air ambulance facility to service UHG where such proposals include for community gain in compensation for loss of park land.</p>
GLWC-C2-183 Mavenbrook Ltd	<p>Rezone Land (1.96 ha) from 'RA' Recreational and Amenity to Institutional and Community (CF), at Terryland</p> <p>Whilst the subject site has been earmarked for recreational activities for a number of years, no meaningful use of the lands has occurred to date.</p> <p>There is a recognised excess of RA – Recreational and Amenity Areas in the City, and more particularly the Headford Road area.</p> <p>There is a shortage of suitably zoned land to accommodate the development requirements of the city in accordance with the targets set down under the National and Regional population projections and targets;</p> <p>National and Regional policy approach supports 'infill' locations vs. 'greenfield' locations, underpinned by National Policy Objectives;</p> <p>the subject site is far more suitable and advantageous than many other development areas in the city given its strategic location and infill context;</p> <p>The proposed rezoning of the subject site is in accordance with the proper planning and sustainable development of the area and would assist in achieving a number of Draft Development Plan policies and objectives with respect to housing provision and the growth of the city in general, in a form that is compatible with the compact footprint requirement of the NPF.</p> <p>Older housing and supporting healthcare and community uses are unlikely to be delivered to anywhere near the scale required, such is the level of competition for development land. The proposed rezoning offers the opportunity to</p>	<p>CE Response</p> <p>The lands in question are wholly within Flood Zone A. It should be noted that the Flood Zones are defined without the benefit of defences, and the sequential approach should be applied on this basis. The requested zoning is a highly vulnerable land use with proposals for housing for the elderly. This would be a highly incompatible use within this flood zone and would be contrary to section 28 guidelines namely the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009). Following the sequential approach means these lands should be retained for the water compatible 'Recreation and Amenity' that is included in the Draft Development Plan.</p> <p>Notwithstanding the flood risk associated with these lands, sufficient zoned lands have been identified to cater for future population in accordance with the Core Strategy. The recommendation from the OPR which is to restrain zoning is also pertinent.</p> <p>It is also considered that any proposed rezoning would give rise to increased traffic movements onto the Headford Road which would impact on the safety and carrying capacity of this road and give rise to a traffic hazard.</p> <p>These lands are a considerable resource for the city in terms of passive recreation and amenity and have significant attributes in terms of climate action supporting carbon sequestration and extensive biodiversity.</p> <p>In consultation with the Recreation and Amenity Section and the Biodiversity Officer, it is their advice that this RA zoning should be retained due to the expanding population in the area, stating that existing amenities and green spaces are under considerable pressure. They state that this area could function for a number of uses including active and passive recreation, dog park, urban farming (allotments, community garden, orchard), pocket forest (climate action) and creation of wildlife corridors to proximal designated sites in accordance with Article 10 of the Habitats Directive. It is also noted that the Greenspace Strategy will consider the needs for recreation and amenity land within the city.</p>

	<p>ringfence a site for such beneficial purposes, and would not result in the loss of any existing amenity to the community.</p>	
GLWC-C2-185 Proofridge Ltd,	<p>Amend Specific Objective text in Figure 11.14 LDR Roscam Village for a 1.10 ha site located off the Rosshill Road in Roscam.</p> <p>The subject lands with an area of approximately 1.10 Ha, are located in Roscam and represents an infill site as there are houses on both sides to the west and east. There is an existing low density housing development and ancillary access road being constructed to the north and this access road currently serves the subject site.</p> <p>It is requested that the zoning for the area identified is retained for 'Low Density Residential' but that the specific objective (Figure 11.14) for 5 houses to the hectare be removed and that a specific objective be attached to the subject site allowing for a revised density of 12 houses to the hectare, in the adopted Galway City Development Plan 2023-2029.</p>	<p>CE Response</p> <p>This submission seeks an amendment to the specific development objective highlighted in fig. 11.14 which states that Development shall generally have a maximum density of 5 houses to the hectare. The submission requests an increase to 12 houses per hectare. This is not recommended as the site is unserviced and cannot sustain the level of density requested.</p> <p>(See CE Response to OPR Recommendation 1-4 and 5)</p>
GLWC-C2-194 Mary McMyler	<p>Retain lands (0.45 ha) as agriculture at Cappagh Road</p> <p>That the portion at the east end of the lands, along Cappagh road, approximately 1 Acre in area, as outlined on the attached map be retained as agricultural.</p>	<p>CE Response</p> <p>Noted. The draft plan land use zoning for this land is Agricultural landuse as per this submission.</p>
GLWC-C2-231 Lakewood Park Residents Association	<p>Retain 'G' Agriculture and High Amenity zoning on 8.177 ha site at Dyke Rd.</p> <p>Any rezoning would have a very negative affect on wild life, bird live and the water quality of the River Corrib.</p> <p>These lands which were for sale are totally unsuited for a Commercial or any such Development.</p>	<p>CE Response</p> <p>Noted, there is no proposal to rezone these lands.</p>

	<p>Land comprise valuable wetlands proximate to the Corrib system which is one of the top ornithological sites in the Country.</p>	
GLWC-C2-233 Tommy Grogan	<p>Amend LDR text for lands (3.649 ha) at Castlegar to increase density</p> <p>Site is located to the rear of Castlegar National School- request to amend the LDR text to increase the density from 2.5 units per Ha to 5 units per Ha. (fig 11.27)</p> <p>A new access road has been constructed from the public road to the said lands.</p> <p>The site is serviced for a 150mm diameter public sewer and a 80mm diameter watermain in the ownership of Irish Water.</p> <p>Increasing the density on these lands would allow for 14 houses, instead of 7, making better use of these lands.</p>	<p>CE Response</p> <p>Figure 11.27 of the draft plan states that development shall have a maximum density of 2.5 houses to the hectare. The amendment being sought is to increase the density to 5 units per Ha taking account of the presence of an access road and sewer and water connection</p> <p>The recommendation from the OPR is to restrain zoning and that an LDR zoning is unsustainable and not compatible with the compact growth approach. The OPR specifically references this site and requests its omission as LDR.</p> <p>In this regard, it is noted that these lands are peripheral and non-sequential, however, there is justification for retention as LDR based on the planning history of the site and on the basis of permitted works that have already been carried out to service these lands. It is considered, given that there will be displacement of homes in this area due to the reservation/approval of the strategic route, that this may present opportunities to retain a cohesive community in the area by offering similar type housing opportunities.</p> <p>The proposed density change would conflict with the specific objective for the N6 GCRR. As the N6 GCRR has been approved by An Bord Pleanála, land use objectives should safeguard the scheme corridor free from adverse development that could prejudice its delivery.</p> <p>It is considered that the existing density requirement is appropriate to be retained, based on the level of services and the established pattern of development in the area.</p> <p>In accordance with the Core Strategy which is a robust evidenced based strategy for future sustainable development, arrived at following a detailed analysis of population and land use in the city taking into account a range of factors, in particular proximity to public and sustainable transport facilities, accessibility, availability of water and waste water infrastructure, proximity to services and amenities, it is recommended that the existing density be retained.</p>

	Rezone lands from LDR to G on the Roscam Peninsula	CE Response
GLWC-C2-46 Save Roscam Peninsula	The submission relates to a number of folios (total area – 11.661 ha) in the Roscam area which relate to LDR zoning.	The rezoning of lands in Roscam namely the former par 3 golf course and adjacent lands from LDR to G (Agriculture and High Amenity) for use as future parkland is not considered appropriate. There is no planning justification to rezone these lands. These lands have the benefit of planning permission for residential development approved by An Bord Pleanala. It is noted that this approved development is currently subject to judicial review proceedings and therefore it is considered inappropriate to make any amendments at this stage.
GLWC-C2-84 Save Roscam Peninsula	These lands were zoned from G to LDR in 2005 without carrying out the required Habitats Directive Assessments under the Habitats Directive.	In consultation with the recreation and amenity section, there are no proposals currently or within the period of the plan to acquire lands in this area for parkland purposes. The Greenspace strategy will review open space needs for the city and determine future needs.
GLWC-C2-32 Save Roscam Peninsula CLG	The zoning of lands was inconsistent with the findings of the 2005 Habitats Inventory, as it identified Roscam as an area of high biodiversity as part of a network of natural corridors for biodiversity in the city.	With regard to rezoning other LDR lands in the vicinity to G use, it is considered that a G zoning is not appropriate for these lands for the period of the current plan.
GLWC-C2-33 James McCarthy	LDR Zoning is Contrary to the Government's Policies which requires the development of brownfield sites and not greenfield ones; contrary National Biodiversity Action Plan 2017-2021 and the EU soil strategy for 2030.	(see CE response to OPR Recommendation 1-4 and 5)
GLWC-C2-175 Deirdre Greally	LDR zoning creates urban sprawl and puts pressure both on the environment and infrastructure demands.	
GLWC-C2-135 Rosshill/Roscam Residents Association	These LDR lands are adjacent to the Galway Bay SAC and pHNA and Inner Galway Bay SPA. The lands are ecologically sensitive greenfield sites and should not be zoned for development of any kind on account of their location and their hydrogeology located on a karstified regionally important aquifer on a limestone base	
GLWC-C2-221 Orla Concannon	These Lands are not Serviced, significant upgrade is required to the existing sewer network.	
GLWC-C2-220 Deirdre Greally	To the south, the Lands are adjacent to a registered protected structure – the multistep pyramid Roscam Folly RPS 8803 – surrounded by an octagonal wall garden with beeboles. The wall garden landscape feature is listed in the NIAH Garden Survey – Site ID 5509.	
GLWC-C2-218 Claire Finn		
GLWC-C2-217 Mary Walsh		

GLWC-C2-215 Sheenagh MacLaverty	The lands are close to Roscam ecclesiastical enclosure – registered monument GA094-122 and a standing stone (RPS 8801).	
GLWC-C2-214 Nuala Cosgrove	To the south, the lands are adjacent to a registered structure – the Roscam Folly, RPS 8803 and walled garden landscape feature is listed in the NIAH Garden Survey.	
GLWC-C2-210 Mairin Ui Chomain	A G land use zoning is more appropriate supporting biodiversity, climate action, amenity provision and relieves unwarranted pressure on the poor existing wastewater infrastructure in Galway City.	
GLWC-C2-207 Ann King	In addition, the lands are serviced by narrow local roads which will not be able to cope with any increased traffic generated by development.	
GLWC-C2-206 Maura Long	LDR zoning is contrary to Government policy. These lands are all greenfield sites and either adjacent or in very close proximity to two European Protected Sites and a proposed National Heritage Area and close to woodland areas.	
GLWC-C2-205 Bernadette Carroll	The Council should comment also on whether it is possible to rezone a site which has a live planning permission, as one of the sites marked does. Response should also consider the Greenway planned through this general area.	
GLWC-C2-204 Jane Shimizu		
GLWC-C2-203 Paulene Kennelly		
GLWC-C2-128 Ciarán Lynch		
GLWC-C2-100 John Grelish		
GLWC-C2-90 Anne Burn		

GLWC-C2-87 Deirdre Grealish		
GLWC-C2-223 Elaine Jeff		
GLWC-C2-123 Owen Hanley		
GLWC-C2-86 Coastal Action Group	Coastal Greenway from Ballyloughane to Oranmore-request that indicative greenway/cycleway as proposed be removed	CE Response The plan acknowledges in Section 5.7.1 that in order to conserve and protect sensitive ecological areas, greenway routes may need to be restricted or redirected to less sensitive areas. In this regard, the routes of proposed greenways shown on accompanying Development Plan maps are indicative only.
GLWC-C2-226 Émeline Cacciaguidi-Fahy	Submission represents residents and landowners from Ballyloughane to Oranmore. Requests that the indicative greenway/cycleway route proposed on the Draft City Development Plan, be removed.	
GLWC-C2-225 Sinead Bradbury	Proposing a route while the period of Public Consultation with The Galway - Athlone Cycleway Project Team is open undermines and is inappropriate during this process.	The plan acknowledges in Section 5.7.1 Greenways, Boreens and Public Rights of Way, that in order to conserve and protect sensitive ecological areas, <i>greenway routes may need to be restricted or redirected to less sensitive areas.</i> <i>In this regard, the routes of proposed greenways shown on accompanying Development Plan maps are indicative only.</i>
GLWC-C2-220 Deirdre Greally	The specific route along which the existing, proposed route for a greenway/cycleway lies in a pristine environment, of extreme ecological importance, protected by the EU Habitats Directive.	
GLWC-C2-218 Claire Finn		The draft plan further states that <i>proposed greenways will be subject to a route selection process, which will take cognisance of site-specific circumstances including consideration of ecological and environmental sensitivities. Such routes will only be developed within and adjacent to European Sites where it can be shown that there will be no adverse impacts upon the integrity of the sites as defined by their conservation objectives.</i>
GLWC-C2-217 Mary Walsh	The coastline should be left undisturbed. Increasing access and development across what is a very natural, undisturbed environment is a very retrograde step.	
GLWC-C2-216 Pauline Quigley	It would have a detrimental impact on archaeology sites. These are protected by the state under the National Monuments Act, 1930-2004 and are listed in the national Record of Monuments and Places (RMP).	Policy 5.2 Protected spaces: Sites of European, National and Local Ecological Importance is an important safeguard ensuring protection of European sites and requiring that all such projects will be subject to screening and appropriate assessment. There is also a range of other policies in the draft plan which actively protect, conserve and enhance sites
GLWC-C2-214 Nuala Cosgrove		
GLWC-C2-210 Mairin Ui Chomain	Is essential to ensure that best practice is followed. Different routes need to be prioritized based on their location, ie a route within 10km of a main city must be a commuter route first and	With regard to the objective for a greenway route at Roscam, it is recommended that the indicative route as mapped be retained in the draft plan for the present,

GLWC-C2-207 Ann King	foremost, as direct a route as possible; alongside/as close as possible to existing infrastructure linking residential areas to schools/colleges/sporting facilities/retail areas, etc. Any route outside that must then be allowed to meander existing natural routes.	and that text of Section 5.7.1 be embellished to address the concerns of various submissions. The preferred national greenway route option is scheduled to be finalised in Q4 2022. In the event that this proposes an alternative route, the current objective can be examined. A default option would be to retain the objective for the route to function as an informal walking trail which would support the objectives of the plan in terms of enhancing recreational amenity and accessibility to the coastline of this part of the city. It is recommended that the text of Section 5.7.1 be amended to reflect this.
GLWC-C2-206 Maura Long	The route should be planned with the intention that the safety of all potential users is of paramount importance, therefore the greenway/cycleway should be close to residences and road networks.	CE Recommendation
GLWC-C2-205 Bernadette Carroll		Amend Section 5.7.1 Greenways, Boreens and Public Rights of Way- insert text in green after the 3 rd paragraph as follows:
GLWC-C2-204 Jane Shimizu	There must be no severance of private landholdings, without prior consent of the landowner.	
GLWC-C2-203 Pauline Kennelly	There is a reasonable, alternative route, which is of more benefit to the local population, and so will be of greater use, resulting in a reduction of traffic, having a positive effect on the climate and an improvement of the physical and mental health of the people of the west of Ireland and those who visit us.	The plan acknowledges that in order to conserve and protect sensitive ecological areas, greenway routes may need to be restricted or redirected to less sensitive areas. In this regard, the routes of proposed greenways shown on accompanying Development Plan maps are indicative only. Proposed greenways will be subject to a route selection process, which will take cognisance of site-specific circumstances including consideration of ecological and environmental sensitivities. Such routes will only be developed within and adjacent to European Sites where it can be shown that there will be no adverse impacts upon the integrity of the sites as defined by their conservation objectives.
GLWC-C2-169 Mark Wilson	Consultation should happen with the landowner representative local group Coastal Action Group or the wider representation group, Galway Cycling Solutions, in order to discuss the provision of an appropriately located route in this area.	In particular, the section of the indicative coastal greenway route between Ballyloughane and the eastern city boundary will be further considered following the establishment of the National Galway to Dublin Greenway preferred route option which is due to be finalised in Q4 2022.
GLWC-C2-128 Ciarán Lynch		
GLWC-C2-100 John Grealish		
GLWC-C2-91 Galway Cycling Solutions		
GLWC-C2-90 Anne Burn		
GLWC-C2-88 Maria Long		
GLWC-C2-87 Deirdre Grealish		

GLWC-C2-138 Conor Coyne GLWC-C2-94 Mairin. GLWC-C2-130 Rosshill/Roscam Residents Association		
GLWC-C2-45 Save Roscam Peninsula GLWC-C2-33 James McCarthy	<p>Rezoning land from LDR to G on the Roscam Peninsula</p> <p>The land is not serviced and zoning a greenfield site LDR in a coastal area of the City, in very close proximity to 2 no. European Protected Sites, is contrary to the NPF and the Government's Biodiversity Action Plan.</p> <p>The land was zoned LDR in the 2017-2023 draft development plan contrary to the CE recommendation.</p> <p>These lands have not been developed. An Bord Pleanála, on appeal, has refused 3 no. planning applications (ABP-301019-18; ABP-301417-18; and ABP-304592-19) based on groundwater vulnerability, public health and lack of a winter birds survey.</p>	<p>CE Response</p> <p>This submission refers to a specific site in Roscam. Chapter 11 section 11.2.8 Residential and Low Density Residential LDR includes a specific development objective for these lands Section. Fig 11.30 on (page p291) indicates the site which measures 1.13 ha and has an objective that development shall be restricted to 2 houses only, reserved for the use of immediate family members of the landowner.</p> <p>This objective was specifically incorporated into the current plan to facilitate two dwelling houses only for family use. The zoning of this land and inclusion of this specific development objective was decided during the current development plan preparation process in 2016.</p> <p>Of relevance to this submission is the CE Response to the OPR recommendation 1-4 and 5.</p>

Specific Objectives		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-72 Land Development Agency	<p>CI Land Use Zoning Objective - Dyke Rd and Sandy Rd</p> <p>Consider that the CI land use zoning objective on the Dyke Road and Sandy road sites is inconsistent with the plans strategic vision and policy direction for these sites in particular with regard to supporting residential uses</p>	<p>It is considered that the CI land use zoning objective on the Dyke Road and Sandy road sites is consistent with the strategic vision and policy direction for these sites including supporting residential uses. It is noted that the designated Regeneration and Opportunity sites are mapped specific objectives on the land use and specific objectives map. It is also states in Chapter 11 section 11.2 that For</p>

	<p><i>clarity, in conjunction with zoning objectives, additional requirements for development on Regeneration and Opportunity Sites are set out in Chapter 10.</i></p> <p>In order to give further clarity and to reinforce the ambitions to deliver regeneration on designated regeneration and opportunity sites. It is recommended that the draft plan be amended to include in the zoning objectives tables for CC and CI and that residential and mixed use development on Regeneration and Opportunity sites will be uses which are compatible with and contribute to the zoning objective.</p> <p>CE Recommendation</p> <p>Amend Section 11.2.6 Commercial/Industrial CI Land Use Zoning Objective to insert text in green as follows:</p>
	<p>Zoning Objective CI</p> <p>To provide for enterprise, light industry and commercial uses other than those reserved to the CC zone</p>
	<p>Uses which are compatible with and contribute to the zoning objective, for example</p> <ul style="list-style-type: none"> – Warehousing/Storage – Retail of a type and of a scale appropriate to the function and character of the area – Specialist offices – Offices of a type and of a scale appropriate to the function and character of the area – Light Industry – Accommodation for the Traveller Community – Childcare facilities – Community and cultural facilities <p>Allow for development of Regeneration and Opportunity Sites in accordance with the</p>

		<p>provisions of Chapter 10 and Policy 10.2 Strategic Regeneration and Opportunity Sites, particularly where it is identified to provide for mixed use development which includes for residential.</p>
<p>Amend Section 11.2.7 City Centre Land Use Zoning Objective and insert text in green as follows:</p>		
<p>Zoning Objective CC</p> <p>To provide for city centre activities and particularly those, which preserve the city centre as the dominant commercial area of the city</p>		
	<p>Uses which are compatible with and contribute to the zoning objective, for example</p>	<ul style="list-style-type: none"> – Retail – Residential – Offices, banks and professional services – Tourist related uses – Cultural and community uses – Buildings for education – Recreation – Childcare facilities – Places of worship – Allow for development of Regeneration and Opportunity Sites in accordance with the provisions of Chapter 10 and Policy 10.2 Strategic Regeneration and Opportunity Sites, particularly where it is identified to provide for mixed use

			development which includes for residential.
GLWC-C2-121 Galway Harbour Company	<p>Industrial I Land Use Zoning Objective – 11.2.5</p> <p>Broaden text to allow for renewable energy and offshore wind energy projects</p> <p>In line with the future role of the port in the renewable and offshore energy sector, it is important that the specific land use zoning objectives in the new plan support this role. In this regard, Galway Harbour Company Enterprise Park will play an important part in the provision of facilities relating to renewable and offshore energy.</p> <p>Lands zoned I (Industrial) at Lough Atalia has the following specific development objective;</p> <p>“Lands zoned I at Lough Atalia between the railway line and the seashore comprising of approximately 16.2 hectares. Development on this site will be limited to activities relating to Galway Port expansion and industries which must be located adjacent to the harbour for a viable existence, provided however, that the processes involved are environmentally acceptable and do not interfere with the residential amenity of nearby housing developments.” It is that this specific development objective for this site is broadened to include facilities and projects relating to renewable energy and offshore wind energy.</p>	<p>CE Response</p> <p>The draft plan recognises the important role of the harbour and this is reflected throughout the plan supporting appropriate proposals for the improvement, development and extension of port facilities and supporting infrastructure.</p> <p>It further states that as the western seaboard and the North Atlantic is likely to be a key strategic zone for the testing, installation, and continued expansion in the area of marine renewables the Port of Galway is ideally placed to tap into these emerging marine enterprises associated with the sustainable energy sector and the offshore renewable energy sector (section 6.3.9).</p> <p>With regard to the existing specific objective in section 11.2.5 it is recommended that this should be amended to reflect the broader function of the I zoned lands at this location and the future role of the port. Having regard the OPW submission with regard to areas of flood risk, it is also appropriate to include that a specific flood risk assessment will be required for any development on areas identified as at flood risk.</p> <p>CE Recommendation</p> <p>The following amendment is proposed:</p> <p>Amend Section 11.2.5 Industrial I Land Use Zoning Objective-specific development objective to include the following text in green</p> <p><i>Lands zoned I at Lough Atalia between the railway line and the seashore comprising of approximately 16.2 hectares. Development on this site will be limited to activities relating to Galway Port expansion and industries which must be located adjacent to the harbour for a viable existence, provided however, that the processes involved are environmentally acceptable and do not interfere with the</i></p>	

		<p><i>residential amenity of nearby housing developments. Such activities can include for enterprises associated with the sustainable energy sector and the offshore renewable energy sector, including green hydrogen and appropriate low emission industries. Any development shall not impact on lands which have been identified as at flood risk and a site specific flood risk assessment will be required as part of any development.</i></p>
GLWC-C2-211 SSE plc	<p>Amendment to Lands zoned "I" 11.2.5 to allow for Hydrogen/Low Emission Industries</p> <p>Amend the second objective set out on page 280 of the Draft City Development Plan relating to the specific development objectives for lands zoned I to include uses such as hydrogen/low emission industries.</p>	<p>CE Response</p> <p>With regard to the existing specific objective in Section 11.2.5 it is recommended that this should be amended to reflect the broader function of the I zoned lands at this location and the future role of the port.</p> <p>CE Recommendation</p> <p>The recommended amendment as set out in response to submission 121 above is proposed:</p> <p>Amend Section 11.2.5 Industrial I Land Use Zoning Objective-specific development objective to include the following text in green:</p> <p><i>Lands zoned I at Lough Atalia between the railway line and the seashore comprising of approximately 16.2 hectares. Development on this site will be limited to activities relating to Galway Port expansion and industries which must be located adjacent to the harbour for a viable existence, provided however, that the processes involved are environmentally acceptable and do not interfere with the residential amenity of nearby housing developments. Such activities can include for enterprises associated with the sustainable energy sector and the offshore renewable energy sector, including green hydrogen and appropriate low emission industries. Any development shall not impact on lands which have been identified as at flood risk and a site specific flood risk assessment will be required as part of any development.</i></p>

GLWC-C2-127 Roselyn Carroll	<p>RA Zoning Specific Development Objectives (Dyke Road, Ballinfoile and Castlegar)</p> <p>RA lands between the River Corrib and the Dyke Road and south of Quincentenary Bridge Road in Council ownership should not be developed without the delivery of a LAP.. .</p> <p>Develop a Peoples Park along the RA lands between the Dyke Road and Corrib on the East Side of the river between the Plots and The Quincentenary Bridge.</p> <p>Include an objective to consider the development of RA lands in Ballinfoile and Castlegar for the provision of services and amenity for sports, not limited to a clubhouse, childcare facilities, library, café, youth centre, swimming pool, where a community facility is proposed and associated pedestrian and cycle access with limited parking or set down.</p> <p>Permit the development of RA lands for childcare facilities which are community based with core ethos of outdoor play and activity.</p>	<p>CE Response</p> <p>The draft plan includes an objective to prepare a local area plan for the Headford road area south of the Bodkin junction as outlined in section 10.7. This plan will set out the need and location for a range of community and amenity facilities. The LAP will seek to maximise the opportunities that exist to integrate and protect the natural heritage assets of the area. The proposals as submitted will be considered as part of the Lap which will determine the optimum uses for the lands at this location.</p> <p>It is not considered appropriate to permit the development of RA lands for childcare facilities, library or other developments of this nature. RA lands have a specific purpose to provide for and protect recreational uses, open space, amenity uses, natural heritage and biodiversity. The provision of many of the facilities cited would be contrary to the policy of the plan to maintain these green spaces and protect from development.</p> <p>Chapter 11 Section 11.2.2 sets out appropriate uses in the RA zone and they are for outdoor recreation and buildings ancillary to the use of the land for outdoor recreation. No change is recommended in this regard.</p>
GLWC-C2-162 HSE	<p>Healthcare and Enhanced Community Care Facilities</p> <p>The HSE advise that quality healthcare facilities in the community in Galway are starting from a low base mainly due to lack of affordable land/ properties in various localities across the city and that zoning can stifle their provision. HSE request "Healthcare and Enhanced Community Care Facilities" are included in the Specific Development Objectives under the CC, CI, I and CF land use zones and that they are listed as being either 'Compatible' or 'Open for Consideration' subject to planning permission, as appropriate, under each of the above zonings.</p>	<p>CE Response</p> <p>The draft plan policy framework gives support for these type of facilities recognising their importance in the community. The draft plan through its policies and objectives supports such services in the city and promotes sustainable neighbourhoods and the 15 minute city concept where residential neighbourhoods have a range of local services to meet their needs.</p> <p>To provide for these facilities is largely accommodated under the zoning objectives in the plan. Buildings for the care of the health, safety or welfare of the public are uses which are compatible with and contribute to the zoning objectives of the CF and R land use zones.</p>

		<p>Under the CI and CC zoning community and cultural facilities are uses which are compatible with and contribute to the zoning objectives. These classes of use have potential to accommodate healthcare and enhanced community care facilities.</p> <p>It is not considered compatible with the I zoning land use objective and it is important to safeguard industrial lands for industrial, enterprise and related uses.</p>
GLWC-C2-178 An Post	<p>Postal Facilities Zoning and Policy</p> <p>The following additional policies below are proposed in relation to an post</p> <p>To support An Post in the provision of new postal facilities and the enhancement of existing facilities, including operational requirements, in the City.”</p> <p>To facilitate the provision of postal facilities and infrastructure at suitable locations in the City.”</p> <p>To promote the integration of appropriate postal facilities, including post offices, processing, sortation and distribution facilities, within new and existing communities that are appropriate to the size and scale of each settlement.”</p>	<p>CE Response</p> <p>The draft plan through its policies and objectives supports a range of services in the city and promotes sustainable neighbourhoods and the 15 minute city concept where residential neighbourhoods have a range of local services to meet their needs.</p> <p>While the council recognise the essential services provided by An Post, it is not deemed appropriate for a development plan to single out An Post over other essential services.</p> <p>It is considered that there is sufficient flexibility in the plan to facilitate the operations of An Post within the context of the proper planning and sustainable development of the city. Any new facilities/changes to existing facilities will be subject to the development management process.</p>
GLWC-C2-190 An Taisce - Galway Planning Committee	<p>Specific Objective- Merlin Park fig 11.9</p> <p>The proposed rezoning would involve destruction of woodlands. While there is a need to build new houses to meet the housing shortages, the rezoning should be limited to North. The woodlands which it is proposed to destroy are a contiguous part of Merlin Park woods.</p> <p>It is requested to: Insert a new specific objective in Chapter 11 in relation to land at Merlin Park: “Development shall not result in the destruction of woodlands which would act as a visual barrier from the Dublin Road to any housing that is to be built on lands at Merlin Park.”</p>	<p>CE Response</p> <p>It is not proposed to change the R zoning on lands to the south of Merlin Lane. Figure 11.9 includes that the retention of trees and hedgerows and additional planting shall form an integral part of an overall layout of the area and shall include for a landscaped buffer to screen development from the Dublin Road. It should also be noted that there is a band of RA zoned land to the south of this site which acts as an important green buffer zone along the Dublin Road and an ecological corridor linking with Merlin Woods.</p>

GLWC-C2-123 Owen Hanley	<p>Merlin Park Lane- Figure 11.9- Concerns with encroachment on Merlin Woods</p> <p>The land zoning changes from LDR to R on Merlin Lane encroach on parts of Merlin Woods and should either include a setback on the southern and western boundaries or be redrawn to reduce to footprint and depletion of the wooded area</p>	
GLWC-C2-229 Friends of Merlin Woods	<p>Add text to amend CF zoning language for Merlin Park- 11.21</p> <p>The following are specific development objectives for a number of CF zones throughout the city:</p> <p>CF lands at Merlin Park comprising approximately 34 hectares. The Council will consider the development of these lands for institutional, or community facilities use either by the Health Services Executive or another institution and will not permit residential, commercial or industrial development. While ensuring the surrounding woodlands habitats are not impacted negatively</p>	<p>CE Response</p> <p>It is not recommended that this wording be inserted into this specific objective. This specific objective relates to the CF zoned lands only. Any planning application associated with the development of CF lands at this location will be assessed with regard to compliance with all aspects of plan policy including Chapter 5 policy which relates to protection and enhancement of woodlands in the city.</p>
GLWC-C2-229 Friends of Merlin Woods	<p>Add text to Section 11.2.8 Residential R and LDR Land Use Zoning Objectives</p> <p>Add "Where possible hedgerows and stone walls shall be retained and supplemented by appropriate landscaping" to the following objectives in Section 11.2.8 Residential R and LDR Land Use Zoning Objectives</p> <p>Zoning Objective R</p> <p>To provide for residential development and for associated support development, which will ensure the protection of existing residential amenity and will contribute to sustainable residential neighbourhoods.</p> <p>Zoning Objective LDR</p>	<p>CE Response</p> <p>It is not recommended that this wording be inserted into the Residential R and LDR Land Use Zoning Objectives table in section 11.2.8.</p> <p>Chapter 3 includes that to give new developments a context and identity, open space should be designed to incorporate existing natural features such as trees, hedgerows, slopes and rock outcrops.</p> <p>Chapter 5 includes that the Council will include measures to encourage biodiversity and ecological stepping stones in developments, including the retention of existing natural features such as trees, hedgerows, stone walls and native species planting.</p> <p>Policy 5.2 includes to support the inclusion of natural features, such as trees, hedgerows, stone walls, ponds and the use of green design</p>

To provide for low-density residential development which will ensure the protection of existing residential amenity and environmental sensitivities.	features and the incorporation of biodiversity measures in developments layouts. Policy 5.4 includes to Integrate existing trees and hedgerows on development sites where appropriate and require tree planting, as part of landscaping schemes for new developments. Development Standards in Chapter 11 include that existing trees, hedgerows and stone walls shall be retained and integrated within new developments.
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	Other Zoning Related Submissions	
GLWC-C2-4 Paul Rush	<p>Remedial land zoning</p> <p>Most of the housing is in Knocknacarra and most of the employment is in Parkmore. To address this imbalance all suitable available land in the west of the city should be zoned commercial and in the east side zoned residential.</p>	<p>CE Response</p> <p>The Core Strategy of the plan is a robust evidenced based strategy for future sustainable development of the city and sets out the optimum location for development. This is arrived at following a detailed analysis of population and land use in the city taking into account a range of factors, in particular proximity to public and sustainable transport facilities, accessibility, availability of water and waste water infrastructure, proximity to services and amenities. It has identified suitable lands in the east and west of the city for commercial and residential uses. (See also CE response to OPR Observation 3)</p>
GLWC-C2-38 Transport Infrastructure Ireland	<p>TII- N6 GCRR Mapping</p> <p>Submission states that there is a serious concern that the N6 GCCR has not been included on the Draft Development Plan Zoning. It is recommended that the N6 GCCR is included on the Draft Development Plan Zoning Objective mapping.</p> <p>Evidence-based review and evaluation of the objectives (highlights zoning objectives) on and in the vicinity of the N6 GCCR should be included in the Draft Plan.</p> <p>Details of mitigation actions should be incorporated in the amended draft development plan to ensure protection of the national road scheme.</p>	<p>CE Response</p> <p>A specific objective for the N6 GCCR route corridor is included on the draft Land Use and Specific Objectives Map.</p> <p>In the course of the preparation of the draft plan all objectives from the current plan and new objectives have been reviewed and evaluated. The mapped specific objective for the N6 GCCR route was amended to reflect the most up to date route corridor which reflects the approved route granted permission by An Bord Pleanala.</p> <p>Throughout the draft plan there is support the N6 GCCR route corridor as a critical piece of infrastructure for the city and as part of the implementation of the GTS.</p> <p>Section 11.2 of the draft plan includes that priority will be given to the reservation of the N6 GCRR designed strategic road corridor and any associated land requirements over other land use zonings and specific objectives. It is considered that there is sufficient policy in place to safeguard this route.</p>

GLWC-C2-38 Transport Infrastructure Ireland	TII- Castlegar Zonings	CE Response
GLWC-C2-123 Owen Hanley	<p>Having regard to the provisions of official national policy related to national roads and also to promote sustainable development of the Castlegar area, TII considers that the zonings within the Castlegar area should be reviewed and be subject to a future Local Area Plan with associated ABTA. The Local Area Plan should address impacts on the national road network and future N6.</p>	<p>It is not recommended that the Castlegar area is subject to an LAP. The undeveloped residential zoned lands in this area have specific objectives which together with other policies in the plan support their sustainable integrated development.</p>
	<p>The submission highlighted that the following were of particular concern:</p> <ul style="list-style-type: none"> ○ Figure 11.3 West of Headford Road ○ Figure 11.5 North West of Tuam Road: Castlegar ○ Figure 11.6 Junction of Tuam Rd and Castlegar Road ○ Figure 11.17 LDR Parkmore ○ Figure 11.18 LDR Tuam Rd. 	<p>With regard to Figure 11.3, Figure 11.5, Figure 11.6, Figure 11.17 and Figure 11.18, the council notes the concerns of TII in relation to their impact on the national route network. It is noted that policy 4.6 Road and Street Network and Accessibility includes to support national policy and guidance with regard to protection of the National Road network including the strategic function of the TEN-T core and comprehensive network. Development objectives are also required to be in accordance with the DOECLG Spatial Planning and National Roads Guidelines (2012).</p> <p>The draft plan also includes that the Council will continue to work with TII and other national agencies to protect and enhance the capacity of these national routes. Development proposals for these lands will be required to address traffic impacts on the surrounding road network and will be required to adhere to the policies and standards of the draft plan and to national guidelines.</p>
GLWC-C2-85 East of the Corrib: Terryland-Castlegar-Ballinfoile Community Stakeholders	<p>Request for lands to be rezoned and purchased by GCC for expansion of Urban Hub- Ballinfoile Castlegar Neighbourhood Centre</p> <p>Submission notes that there is little to no Recreation and Amenity Space in the Ballinfoile Castlegar Neighbourhood Community and that efforts are needed to deliver a plan for a connected expansion of the BCNC to better provide for its community needs.</p> <p>Specific reference made to delivery of a Community Hub, develop an Urban Village to connect Castlegar Village and School and that lands need to be zoned for a health care facility.</p> <p>Review the land zoning and provide for the delivery of facilities and amenities. At present the RA plots of land are all used and there is no capacity for the community to develop and create an Urban Hub at Ballinfoile Castlegar along the Headford Road and at The</p>	CE Response <p>With regard to the need for additional recreation and amenity space in the Ballinfoile/Castlegar area, it is considered that there is considerable RA lands located in proximity namely the Crestwood RA lands and the Terryland River valley RA lands. Notwithstanding this, the Greenspace Strategy will include a review of the needs for recreation and amenity space in the city and will consider the needs of this area.</p> <p>The undeveloped lands along the Headford Road have an R land use zoning with the objective to provide for residential development and for associated support development.</p> <p>Local shops and other local services, schools, childcare facilities, healthcare, community, cultural and recreational facilities are all compatible with this objective. The provision of such facilities is</p>

	<p>Recreational lands at Ballinfoile. The community needs facilities and amenities. Before any of this lands must be sought for the provision of same in response to the request of the residents of the Communities. Make specific reference to the delivery of Community Hub at Ballinfoile Castlegar area.</p>	<p>supported through other policy in the plan to support sustainable neighbourhoods and the 15 minute city concept. In this regard there is no requirement to rezone these lands.</p> <p>It should be noted also that the draft plan states that in order to inform the requirements for community facilities in the city, the council will undertake an audit of community facilities. The purpose of the audit will be to identify current gaps, demand, and capacity and identify areas where broader use can be made of community resources including opportunities for multi-purpose use.</p>
GLWC-C2-127 Roselyn Carroll	<p>Map presentation- For clarity - please include all layers of City Map (A) on the outer aspect of City Centre Map (B) and all layers of City Centre Map (B) on the inner segment of City Map (A).</p>	<p>CE Response</p> <p>Given the extent of detail on the City Centre map, it may not be possible to include all layers of the City Centre Map (B) on the inner segment of City Map (A). The maps have been prepared to enable greatest legibility. An interactive map will also be prepared for the final plan which will enable greater legibility.</p>
GLWC-C2-141 National Transport Agency	<p>LDR – NTA</p> <p>The NTA recommend that low density zonings within the City area should be removed.</p>	<p>CE Response</p> <p>Please refer to the CE response to the OPR Recommendation 1-4 and 5 in this regard.</p>
GLWC-C2-150 Angela Casey GLWC-C2-184 Valerie Walsh	<p>Munster Avenue</p> <p>The draft plan must protect Munster Avenue from intensive high-density development that could impact negatively on the residential community</p> <p>The change from the existing LDR zoning in the city centre area to R zoning will facilitate developments with higher densities in the inner and city centre residential communities which is unsuitable for these areas.</p> <p>Munster Avenue is not suitable for high density residential development. To permit high density development would destroy the</p>	<p>CE Response</p> <p>In relation to Munster Avenue, the majority of this street is zoned for residential use and a smaller section towards the William Street West Road junction is zoned for CC use. This zoning has not changed from the current plan 2017-2023 and has not changed in the previous two development plans dating back to 2005.</p> <p>In terms of residential neighbourhoods, Munster Avenue straddles the inner residential area and the city centre as set out in Figure 3.1 Galway city neighbourhoods. The boundaries of these neighbourhoods have not changed from the current plan.</p> <p>The submissions received express concern with regard to potential for high density development to impact on the residential community of</p>

	<p>community and residential amenity characteristics of this neighbourhood.</p> <p>The reference to legally established non-conforming uses at section 11.1 should also address non-legally established non-conforming uses which essentially are unauthorised developments, and include a provision that these will not normally be granted planning permission.</p>	<p>Munster Avenue. It is considered that the policies of the plan set out in Chapter 3 in relation to protection of the character and amenities of these area is sufficient to address the concerns of the community.</p> <p>In relation to the Inner Residential Areas, Section 3.7 of the draft plan states that infill development should not be of such a scale that represents a major addition to, or redevelopment of, the existing urban fabric. It also states that infill development will have regard to the existing pattern of development, plots, blocks, streets and spaces. Infill development will also have regard to the scale and proportion of existing buildings, building lines, massing and height of buildings in relation to the street.</p> <p>The protection of existing residential amenity and character is a priority but must be balanced with opportunities for sustainable high quality regeneration and appropriately scaled infill.</p> <p>Policy 3.6 Sustainable Neighbourhoods: Inner Residential Areas includes to protect the quality of inner residential areas by ensuring that new development through consolidation, infill and redevelopment does not adversely affect their character and has regard to the prevailing pattern, form and density of these areas.</p> <p>These are considered reasonable policies to support compact growth and to ensure that the character and amenity of these areas is not unduly impacted upon. Any development opportunities within these areas will be assessed in accordance with these policies and against a range of other policies and standards in relation to urban design, public realm, open space, traffic safety and car parking.</p>
GLWC-C2-151 Nikunj Sakhrelia	<p>Zoning for places of Worship</p> <p>Requests zoning for places of worship in the area of Knocknacarra/Rahoon/ Briarhill for the different communities who have emigrated from different countries.</p>	<p>CE Response</p> <p>It is not considered appropriate to have a dedicated land use zoning for places of worship. They are considered community facilities which can be accommodated on a number of land use zonings which is considered reasonable and supports flexibility in community facility provision.</p>

GLWC-C2-156 Lidl Ireland GMBH	<p>In attributing specific objectives or other commentary on a wide range of sites across the city, mapped numbered objectives would be an appropriate, to ensure that there is clarity as regards the exact intention of the Planning Authority.</p> <p>In this regard we note the identification of the 'Arch Motors' site as a specific location, along with 'Seamus Quirke Road' as a specific location under the 'Regeneration and Opportunities Sites' section of the Draft Plan.</p> <p>As such, the reference to 'local retailing needs' under the Commercial/Industrial Land Use Zoning Objective could be assumed to be removed from the 'Arch Motors' site as the reference under the zoning objective refers to 'Seamus Quirke Road'.</p> <p>If the 'local retailing needs' is to be preserved, which we consider would be wholly inappropriate for the reasons outlined above, it should be clarified as to what specific sites it applies to.</p>	<p>Refer also to Chapter 10 in relation to the Arch Motors site.</p> <p>In accordance with the retail strategy and Core Strategy, it is considered appropriate to retain the existing specific objective in Chapter 11 section 11.2.6 that Bulky goods retailing and local retailing needs, will be the only retail types considered on CI zoned lands not provided for in the Retail Hierarchy at/adjoining Seamus Quirke Road.</p> <p>This site is located adjacent to the lands which are designated as a district centre. This site is separate and independent to the Westside district centre designated lands. Ample lands are available within the Westside district centre to cater for the commercial and retail needs of this area. In this regard it would be not be appropriate to remove this specific objective.</p> <p>It is also considered that any alteration to this objective is premature pending completion of a retail strategy. Policy 6.11 Retail Strategy requires to review the strategies and policies for retailing following the preparation of a joint retail study with Galway County Council, to ensure sufficient policy support to create a positive framework for continued vitality and investment in the main retail areas especially the Galway MASP and to ensure an informed and consistent approach to policies relating to shared retailing activities in line with national policy. This is envisaged to commence in 2022/2023. See also the CE response to OPR Recommendation 10.</p> <p>With regard to mapping of all objectives, this would not be possible given the extent of objectives in the plan. It is clearly stated that the written statement must be read in conjunction with the mapping.</p>
GLWC-C2-156 Lidl Ireland GMBH	<p>Commercial/Industrial Land Use Zoning Objective</p> <p>The Commercial/Industrial zoning could more appropriately be reformatted to a Mixed Use type zoning, with corresponding 'permitted in principle' / 'compatible use' and 'open for consideration' / 'contributory use' conventions in keeping with similar scenarios in other cities and large urban centres.</p>	<p>CE Response</p> <p>The CI land use zoning has evolved over a number of plans. The zoning objective which is to provide for enterprise, light industry and commercial uses other than those reserved to the CC zone is considered to be robust and reflects the needs for commercial areas outside of the city centre</p>

	<p>This issue is further exacerbated by the additional 'layer' of 'Regeneration and Opportunities Sites' which imposes a further set of objectives and standards on a wide range of locations.</p> <p>A number of the 'Regeneration and Opportunities Sites' would wholly and detrimentally interfere with the primary use of the land for CI purposes.</p>	<p>and the range of uses which are examples in section 11.2.6 allows for appropriate flexibility.</p> <p>It is considered that the CI land use zoning objectives is consistent with the strategic vision and policy direction for these sites including supporting residential uses. It is noted that the designated Regeneration and Opportunity sites are mapped specific objectives on the land use and specific objectives map. It is also states in Chapter 11 section 11.2 that <i>For clarity, in conjunction with zoning objectives, additional requirements for development on Regeneration and Opportunity Sites are set out in Chapter 10.</i></p> <p>In order to give further clarity and to reinforce the ambitions to deliver regeneration on designated regeneration and opportunity sites. It is recommended that the draft plan be amended to include in the zoning objectives tables for CC and CI that residential and mixed use development on Regeneration and Opportunity sites will be uses which are compatible with and contribute to the zoning objective.</p> <p>CE Recommendation</p> <p>Amend Section 11.2.6 Commercial/Industrial CI Land Use Zoning Objective and insert text in green as follows:</p>
	<p>Zoning Objective CI</p> <p>To provide for enterprise, light industry and commercial uses other than those reserved to the CC zone</p>	<p>Uses which are compatible with and contribute to the zoning objective, for example</p> <ul style="list-style-type: none"> - Warehousing/Storage - Retail of a type and of a scale appropriate to the function and character of the area - Specialist offices

			<ul style="list-style-type: none"> - Offices of a type and of a scale appropriate to the function and character of the area - Light Industry - Accommodation for the Traveller Community - Childcare facilities - Community and cultural facilities - Allow for development of Regeneration and Opportunity Sites in accordance with the provisions of Chapter 10 and Policy 10.2 Strategic Regeneration and Opportunity Sites, particularly where it is identified to provide for mixed use development which includes for residential. 	
GLWC-C2-172 Department of Education	<p>Map Schools</p> <p>The Department of Education requests if possible that all existing school sites and future education sites could be zoned and mapped on the Co Council's GIS system, to enable co-ordination with the Departments' GIS system and aid in the school planning function</p>	<p>CE Response</p> <p>Existing schools are included on OS mapping. School sites do not have a specific school zoning as they can be accommodated on a number of land use zonings which is considered reasonable and support flexibility in school provision. In this regard it is not appropriate to zone and map future school sites.</p>		

Chapter 11: CE Recommendations

1. Change zoning of lands (0.276 ha) namely the Mercy Convent site at Newtownsmyth from City Centre CC land use zoning to CF Institutional and Community land use zoning .



2. Amend Section 11.2.5 Industrial I Land Use Zoning Objective and insert the following specific development objective - text in green :

Lands zoned I located north of Ballybrit Racecourse. The Council will consider the provision of essential supporting racecourse infrastructure on a portion of these lands and where it is demonstrated that it cannot reasonably be accommodated on the adjoining RA lands, without jeopardising the function of Galway Racecourse.

3. Change zoning of lands (.001 ha) off the Western Distributor Road from Recreational and Amenity RA land use zoning to Residential R land use zoning.



4. Amend Section 11.2.2 Natural Heritage, Recreation and Amenity RA to include the following specific development objective – text in green

RA Lands located adjacent to Barna Woods. The Council will consider the granting of permission for a dwelling on a minimum 0.3 hectare site to immediate members of families of persons who are landowners, where the sylvan character of the area is maintained. Any permission on this site will be subject to environmental and traffic considerations.



5. Amend Section 11.2.8 Residential R and Low Density Residential LDR Land Use Zoning Objectives to include the following additional specific development objective – text in green as follows:

~~LDR Residential R2 lands at the junction of Gentian Hill. Development on these lands shall not exceed a density of 13 houses per hectare and shall be restricted to single storey dwellings. One house only shall be open to consideration on the remainder of the undeveloped lands. The design of the development shall have a low profile ridge line which shall not exceed the ridge height of the adjoining development to the east.~~

6. Amend Section 11.2.2 Natural Heritage, Recreation and Amenity RA to include the following specific development objective – text in green

RA lands at Shantalla Neighbourhood Park. The Council will consider the development of a portion of these lands for use as a heliport in association with the provision of an air ambulance facility to service UHG where such proposals include for community gain in compensation for loss of park land.

7. Amend Section 5.7.1 Greenways, Boreens and Public Rights of Way- insert text in green after the 3rd paragraph as follows:

The plan acknowledges that in order to conserve and protect sensitive ecological areas, greenway routes may need to be restricted or redirected to less sensitive areas. In this regard, the routes of proposed greenways shown on accompanying Development Plan maps are indicative only. Proposed greenways will be subject to a route selection process, which will take cognisance of site-specific circumstances including consideration of ecological and environmental sensitivities. Such routes will only be developed within and adjacent to European Sites where it can be shown that there will be no adverse impacts upon the integrity of the sites as defined by their conservation objectives.

In particular, the section of the indicative coastal greenway route between Ballyloughane and the eastern city boundary will be further considered following the establishment of the National Galway to Dublin Greenway preferred route option which is due to be finalised in Q4 2022.

In the event that this preferred national route option differs in alignment to the Galway City Council mapped indicative greenway route, the objective will not continue to accommodate a cycle route but will be to provide solely for an informal walking greenway route.

8. Amend Section 11.2.6 Commercial/Industrial CI Land Use Zoning Objective and insert text in green as follows:

Zoning Objective CI

To provide for enterprise, light industry and commercial uses other than those reserved to the CC zone

Uses which are compatible with and contribute to the zoning objective, for example

- Warehousing/Storage
- Retail of a type and of a scale appropriate to the function and character of the area
- Specialist offices
- Offices of a type and of a scale appropriate to the function and character of the area
- Light Industry
- Accommodation for the Traveller Community
- Childcare facilities
- Community and cultural facilities
- Allow for development of Regeneration and Opportunity Sites in accordance with the provisions of Chapter 10 and Policy 10.2 Strategic Regeneration and Opportunity Sites, particularly where it is identified to provide for mixed use development which includes for residential.

Amend Section 11.2.7 City Centre Land Use Zoning Objective and insert text in green as follows:

Zoning Objective CC

To provide for city centre activities and particularly those, which preserve the city centre as the dominant commercial area of the city

Uses which are compatible with and contribute to the zoning objective, for example

- Retail
- Residential
- Offices, banks and professional services
- Tourist related uses
- Cultural and community uses
- Buildings for education
- Recreation
- Childcare facilities
- Places of worship
- Allow for development of Regeneration and Opportunity Sites in accordance with the provisions of Chapter 10 and Policy 10.2 Strategic Regeneration and Opportunity Sites, particularly where it is identified to provide for mixed use development which includes for residential.

9. Amend Section 11.2.5 Industrial I Land Use Zoning Objective- specific development objective to include the following text in green

Lands zoned I at Lough Atalia between the railway line and the seashore comprising of approximately 16.2 hectares. Development on this site will be limited to activities relating to Galway Port expansion and industries which must be located adjacent to the harbour for a viable existence, provided however, that the processes involved are environmentally acceptable and do not interfere with the residential amenity of nearby housing developments. Such activities can include for enterprises associated with the sustainable energy sector and the offshore renewable energy sector, including green hydrogen and appropriate low emission industries. Any development shall not impact on lands which have been identified as at flood risk and a site specific flood risk assessment will be required as part of any development.

Chapter 11 (b): Development Standards and Guidelines

11.2 - Land Use Zoning General		
Submission No.	Submission Summary	CE Response and Recommendation
General Development Standards and Guidelines		
GLWC-C2-72 Land Development Agency	<p>Section 11.3.1 (c) Amenity open space provision</p> <p>Request greater clarity be provided concerning the provision of public open spaces and consider that it is reasonable that the quantum of public open space in residential developments, shall be provided having due regard to relevant national guidelines such as Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009).</p>	<p>CE Response</p> <p>This is the current policy context of the draft plan. Section 11.3 Residential Development references that the Council will have regard to the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009) and that Planning Applications for residential developments will have to have regard to these guidelines also. It should be noted that under Section 11.3.1 (c) Amenity Open Spaces Provision in Residential Developments quantitative standards are benchmarked to be provided for in residential developments. Communal recreation and amenity space is required at a rate of 15% of the gross site area. In small restricted infill sites, a minimum of 10% may be provided as public open space where a reduction in the standard is balanced with delivery of units. Residential developments of 4 units or less may be exempt from the 15% open space provision on greenfield sites. These quantitative standards have been deemed to work well and also allow for a qualitative assessment to be applied on a specific planning application basis.</p> <p>The Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009) under Section 4.2.1 states that “It will be necessary for planning authorities to take a more flexible approach to quantitative open space standards and put greater emphasis on the qualitative standards outlined within. Where residential developments are close to the facilities of city and town centres or in proximity to public parks or coastal and other natural amenities, a relaxation of standards could be considered. Alternatively, planning authorities may seek a financial contribution towards public open space or recreational facilities in the wider area in lieu of public open space within the development”.</p> <p>It is considered that the standards as set out in Section 11.3.1 (c) Amenity Open Spaces Provision in Residential Developments are considered acceptable in tandem with policies for qualitative standards for public open spaces as set out in Chapter 3: Housing and Sustainable Neighbourhoods and Chapter 5: Natural Heritage, Recreation and Amenity which incorporate qualitative considerations such as design, accessibility, variety, biodiversity, SuDs and provision for allotments and community gardens.</p>

GLWC-C2-18 Cllr. Terry O'Flaherty	<p>Table 11.2 Indicative Examples of Recreational Facilities</p> <p>Recreational facilities such as basketball courts and skateboarding areas should only be located away from homes, at a sufficient distance where the inevitable noise coming from them will not have such an impact on residents. Such areas can also be a gathering point or magnet for anti-social behavior.</p>	<p>CE Response</p> <p>Noted. Table 11.2 has been amended following consultation with the council's Recreation and Amenity Dept. Basketball courts are not specifically stated in this table; however it should be noted that they could still be supported for developments of 50 residential units or more as they could come under MUGA. The issue of potential gathering points for anti-social behavior is noted, but the determining factor is providing accessible and safe recreational areas. In general most schemes are subject to assessment by Recreation and Amenity relative to layouts and these are generally satisfactory. The forthcoming Green Spaces Strategy will include for additional support and measures on recreational facilities.</p> <p>CE Recommendation</p> <p>Table 11.2: Indicative Examples of Recreational Facilities for Different Sizes of Residential Developments to be amended as follows:</p> <table border="1"> <thead> <tr> <th data-bbox="954 674 1178 754">Number of Residential Units</th><th data-bbox="1178 674 2031 754">Examples of Recreational Facilities</th></tr> </thead> <tbody> <tr> <td data-bbox="954 754 1178 897">0-10</td><td data-bbox="1178 754 2031 897"> <p>No recreation facility required but green infrastructure at a minimum</p> <p>Informal play areas with seat and natural features at appropriate scale to amenity and recreational facility and to include green infrastructure</p> </td></tr> <tr> <td data-bbox="954 897 1178 1008">11-20</td><td data-bbox="1178 897 2031 1008"> <p>Seating, Picnic infrastructure, informal play areas</p> <p>Natural play equipment/natural play area, teen area with seating, picnic infrastructure</p> </td></tr> <tr> <td data-bbox="954 1008 1178 1087">21-50</td><td data-bbox="1178 1008 2031 1087"> <p>Play Equipment, Kick About Area, Formal Garden</p> <p>Small playground, kick about area, landscaped garden/small park</p> </td></tr> <tr> <td data-bbox="954 1087 1178 1214">51-100</td><td data-bbox="1178 1087 2031 1214"> <p>Skateboard Facility, Bowling Green, Basketball Court</p> <p>MUGA, outdoor gym, self-directed play (may include skateboard or other equipment)</p> </td></tr> <tr> <td data-bbox="954 1214 1178 1373">100+</td><td data-bbox="1178 1214 2031 1373"> <p>Play Ground, Playing Pitch, Formal Park</p> <p>Large playgrounds for all ages, playing pitch, landscape park</p> </td></tr> </tbody> </table>	Number of Residential Units	Examples of Recreational Facilities	0-10	<p>No recreation facility required but green infrastructure at a minimum</p> <p>Informal play areas with seat and natural features at appropriate scale to amenity and recreational facility and to include green infrastructure</p>	11-20	<p>Seating, Picnic infrastructure, informal play areas</p> <p>Natural play equipment/natural play area, teen area with seating, picnic infrastructure</p>	21-50	<p>Play Equipment, Kick About Area, Formal Garden</p> <p>Small playground, kick about area, landscaped garden/small park</p>	51-100	<p>Skateboard Facility, Bowling Green, Basketball Court</p> <p>MUGA, outdoor gym, self-directed play (may include skateboard or other equipment)</p>	100+	<p>Play Ground, Playing Pitch, Formal Park</p> <p>Large playgrounds for all ages, playing pitch, landscape park</p>
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GLWC-C2- 125 Valerie Ledwith	<p>Recreational Facilities in House Estates (Basketball Court) - Table 11.2</p> <p>Submission disagrees with the sentiment expressed with the inconvenience of recreational facilities located in housing estates and the notion that leisure facilities for young people are magnets for anti-social behavior. Submission supports that these courts and facilities hold a function as they promote healthy living for children and teens living in these areas.</p> <p>A better solution than banning them is to have a meeting between local Residents Associations and young people. Consensus about times for usage of such facilities can be agreed upon at the local level. Violations of these agreement will then need to be policed appropriately.</p>	<p>CE Response Noted</p> <p>CE Recommendation See response to submission 18 above.</p>
GLWC-C2- 141 National Transport Agency	<p>Figure 11.32 Neighbourhood Areas - NTA</p> <p>The NTA recommend that Figure 11.32 Neighbourhood Areas is amended or removed such that the appropriate development management standards relate to accessibility to public transport and/or active travel infrastructure as outlined in the GTS (or subsequent Metropolitan Transport Strategy)</p>	<p>CE Response</p> <p>Noted. These neighbourhood areas as set out in Figure 11.32 relate to residential development areas in the city to distinguish between criteria for planning applications and have regard to the range of government guidelines under Section 11.3 and the subsequent standards and the policies of the development plan. Given the different character of residential neighbourhoods in the city, the standards are divided into:</p> <ul style="list-style-type: none"> • Outer Suburbs, • Established Suburbs, • Inner Residential Areas, • City Centre Residential Areas. <p>Car parking requirements are presently included under these headings as one of the requirements only. The concerns are noted with regard to the need for development management standards to relate to accessibility to public transport and/or active travel infrastructure as outlined in the GTS. The parking policy in the plan is to work towards National Policy with aligning the parking standards with public transportation and active travel measures with a view to re-evaluating car parking numbers and locations as more projects</p>

		progress from the GTS that allow for increased public transport and active travel. This will form part of the GTS review due to commence in 2022 and be completed in 2023.
GLWC-C2-59 John Brennan GLWC-C2- 173 Galway Cycling Campaign	Cycling Standards Remove the following from Section 11.3.1(h) cycle parking standards as it is not in keeping with the stated ambitions of the GTS, national and regional goals “Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed and flexibility for future enhancement.”	CE Response This text is not encouraging deviations from these cycle parking standards, but rather includes for instances whereby flexibility may need to be applied owing to the appropriate location, layout and nature of the development. It is considered appropriate to have exceptions to cater for future enhancements on a case by case basis.
GLWC-C2- 173 Galway Cycling Campaign	Continuous footpaths (footways) proposal Proposed addition to text in 11.3.1 (b) Standards for Roads and Streets in New Residential Development, p. 296: Add: “Continuous footpaths shall be provided at junctions, and vehicular entrances, to facilitate people with ease of movement. At any such junctions where continuous footpaths are neither feasible nor appropriate, dished kerbs with tactile paving shall be provided to facilitate people with ease of movement.”	CE Response Comments are noted. The draft development plan under Specific Objective 4.8 (17) prioritises improvements to pedestrian movements and safety within the city centre including extension of pedestrianisation, provision of wider footpaths and shared streets. Section 11.3.1 (b) Standards for Roads and Streets in New Residential Development set out the requirements for roads and footpaths will generally be those set out City Council ‘Taking in Charge Policy Document’, and DMURS (2019). Where an innovative layout is accepted by the Planning Authority variations to these requirements may be accepted. In allowing any deviation in the general requirements, the primary consideration will be the safety of pedestrians, cyclists and access for emergency vehicles.
GLWC-C2- 191 Bowling Green Residents' Association	11.4.3 Residential Content Objection to the text on page 305 under Section 11.4.3 Residential Content: ‘Student accommodation, hotels and hostels can be considered as a proportion of the obligation to deliver a residential content’. This is being proposed for the City Centre area only. Large-	CE Response National Policy supports student accommodation as residential as provided for in the Residential Tenancies Act (Amendment) Act 2019. This defines Student Specific Accommodation as housing built or designated for students and used for the sole purpose of providing residential accommodation to students during the academic term. It is considered that these are uses that can be considered in the city centre and can contribute to vitality, vibrancy and safety.

	scale student accommodation, hotels and hostels are all commercial and cannot be considered residential.	
GLWC-C2-190 An Taisce - Galway Planning Committee	Student accommodation, hotels and hostels should not generally be considered as a proportion of the obligation to deliver actual residential content on Regeneration and Opportunity sites	<p>CE Response</p> <p>Noted. National policy supports student accommodation as providing residential accommodation to students during the academic term. It is considered that hotels, hostels and student accommodation all contribute to the vibrancy and vitality of the city and will do the same for Regeneration and Opportunity sites. It is not considered that they will be the sole types of residential uses and will constitute a portion of the residential uses that will be delivered in city centre. It is also noted that a substantial number of residential units have been granted permission in Ceannt Quarter, but are currently under appeal.</p>
GLWC-C2-190 An Taisce - Galway Planning Committee	<p>11.43 Residential Content- proposed text amendments</p> <p>There is a need to create living communities in Regeneration and Opportunity Sites to create a compact, living sustainable city. It is alarming to see the only residential development proposed for the Inner Harbour area to date being student accommodation and a hotel.</p> <p>The proposed wording in the draft should be changed to:</p> <p>Where appropriate, on Regeneration and Opportunity sites, the proportion of residential development will be required to be at a higher level of 30% as detailed in Chapter 10.</p>	<p>CE Response</p> <p>Section 11.4.3 Residential Content states that where appropriate a residential content of at least 20 per cent of the proposed gross floor area will be required for all new development. This applies to the city centre area only. The 20 per cent minimum requirement is appropriate in this context. Student accommodation contributes to the vitality and vibrancy of the city and is an important component of the residential makeup for Galway City.</p>
GLWC-C2-72 Land Development Agency	<p>Plot Ratio/Site Coverage-clarity for Regeneration and Opportunity Sites</p> <p>Advise that plot ratio/site coverage and open space requirements for CI and I land use zones set out in table 11.4 and table 11.5 conflict with the</p>	<p>CE Response</p> <p>Comments are noted. It is considered that tables 11.4 and 11.5 which set the plot ratio/site coverage and Open Space requirements for CI and I zoned do not conflict with flexibility provided elsewhere in Chapter 11. The development plan applies to all lands, public and</p>

	<p>flexibility provided for elsewhere in Chapter 11 and request clarity regarding plot ratio to be applied to regeneration and opportunity sites and request table 11.4 and table 11.5 would not apply to public lands designated as regeneration and opportunity sites.</p>	<p>private. See Chapter 10 and proposed amendments regarding the Urban Density and Building Height Study.</p>
GLWC-C2- 154 HKR Architects	<p>Floor Area Ratio- City Centre</p> <p>Within Cities at appropriate locations plot ratios between 4 and 5 are deemed acceptable provided all other issues are addressed. This intensification of use, for example is essential to attract International Businesses to the City Centre as they will require substantial office space and potential for growth. The only other option is a suburban site which is counter intuitive in respect of how we wish to develop the '<i>15-minute city</i>', a city where work / live and play are all within walkable distances.</p> <p>Applying the morphology of the Historic quarter to all sites in a broad-brush manner will be detrimental to the Future development potential of the city. Opportunities should be identified as sites inviting one -off innovative design solutions.</p>	<p>CE Response</p> <p>Comments are noted. Appropriate building heights were reviewed as part of the Galway City Urban Density and Building Heights Study. This examined what the optimal densities and heights were that could achieve the most efficient and effective use of land to make a positive contribution to the character of the city to create good quality mixed use communities while also contributing to the successful placemaking and liveability. The study was then used in the formulation of a strategy on density and height that was used to inform the preparation of the Draft Galway City Development Plan 2023–2029. See also CE Report response to recommendation 6 of the OPR submission.</p>
GLWC-C2- 141 National Transport Agency	<p>11.10 Transportation - NTA</p> <p>The NTA recommends that Local Transport Plans are prepared for any large development areas within Galway City in order to guide the future growth of these areas.</p>	<p>CE Response</p> <p>Comments noted. Text will be added to Section 11.10.3 Travel Plans, to include language for Local Transport Plans to be prepared for any large development areas. Text referring to Smarter Travel A Sustainable Transport Future 2009-2020 has been replaced with National Sustainability Mobility Policy.</p> <p>CE Recommendation</p> <p>Amend Section 11.10.3 Travel Plans to delete text with strikethrough and insert text in green</p> <p>In line with the threshold indicated in the Department of Transport's Smarter Travel A</p>

		<p>Sustainable Transport Future 2009-2020 National Sustainable Mobility Policy and NTA guidance Achieving Effective Workplace Travel Plans – Guidance for Local Authorities, the Council requires local transport plans to be prepared for all large development proposals. Transport plans may also be requested if an existing or proposed development has the potential to employ over 100 people. Travel Plans are also required for all schools and for residential developments of 100 dwellings or more.....</p>
GLWC-C2-38 Transport Infrastructure Ireland	ABTA <p>“Area Based Transport Assessment (ABTA) is one of a number of complementary assessment processes that can be used in the preparation of local area plans, planning schemes, masterplans and framework plans where they assess a derived demand from land use, the intended effect of ABTA is to ensure that the assessment of transport demand and its associated impact plays a central role in informing the overall scale of development, as well as the mix of land uses, development location, density, phasing and design/ delivery of supporting transport infrastructure/ services across all modes of transport. Essentially, its function is to place the integration of land use and transport planning at the centre of the Plan preparation process.”</p>	<p>CE Response</p> <p>The requirement for ABTA and TTA's for assessment purposes is noted. Section 11.10.3 Travel Plans under Section 11.10 Transportation will be amended to include requirements and a definition for both ABTA and TTA's and will also include reference to DMURS design guidelines as they are applicable to all developments.</p> <p>CE Recommendation</p> <p>Amend Section 11.10.3 Travel Plans to include a fourth paragraph and include the text in green</p> <p>Complementary measures such as Area Based Transport Assessments (ABTA) and Traffic and Transport Assessments (TTA) are required for Local Area Plans (LAP's) and can also be considered on Masterplans and Framework Plans, where the scale of development determines the need for integrated land use and transport planning policies. A Traffic and Transport Assessment will include for a comprehensive review of all the potential transport impacts of a proposed development or re-development, with an agreed plan to mitigate any adverse consequences and should be carried out in accordance with Traffic & Transport Assessment Guidelines PE-PDV-02045 May 2014. The preparation of ABTAs should include for an assessment process focused on understanding transport needs and land use integration, used in the preparation of Local Area Plans, planning schemes and masterplans and shall be carried out in accordance with Area Based Transport Assessment (ABTA) Guidance Notes PE-PDV-02046 April 2018 and supplementary ABTA How to Guide, Guidance Document, Pilot Methodology (2021). There shall also be a requirement for the principles of DMURS to be applied to Local Area Plans, Masterplans and Framework Plans taking into account street design based on the street classification and measures for cyclist and pedestrians to promote placemaking as set out in Section 11.3.1 (b) of the plan.</p>

GLWC-C2-173 Galway Cycling Campaign	<p>11.10 Transportation- Bike Share and Car Share Stations</p> <p>Proposal: To add a new section to 11.10 Transportation, to ensure greater provision of bike and car share stations in new, large developments.</p> <p>Suggested amendment to add section 11.10.7, p314: Add: "11.10.7 For large developments, provision should be made to host car-share schemes and bike-share schemes, through the allocation of dedicated space with operations detailed in Travel Plans as required by the planning authority."</p> <p>Car sharing is a sustainable service. By allowing multiple people to use the same vehicle at different times, car sharing reduces car ownership, car dependency, congestion, noise and air pollution. It frees up land which would otherwise be used for additional parking spaces. Many car share scheme users only use a car when necessary, and walk and use public transport more often than car owners.</p>	<p>CE Response</p> <p>Comments are noted. Text in the draft plan in Chapters 4 and Chapter 11 Section 11.10.3 supports the concepts of car sharing and bike sharing schemes. The inclusion of local policies in respect of Bike Share and Car Share will be subject to national policy and standards, including measures proposed as part of the Five Cities Demand Management Plan which aims to address traffic congestion. Galway City Council awaits guidance on delivery plans for each city nationally. See proposed amendment to Section 4.5 Transport Demand Management Measures text included for in Chapter 4 CE recommendations.</p>
GLWC-C2-127 Roselyn Carroll	<p>11.10.1 - Parking Space Requirement</p> <p>Table 11.6 should include the requirement for cycle parking</p>	<p>CE Response</p> <p>The draft plan includes for a separate cycle parking table as provided for in Table 11 Cycle Parking Requirements for Residential Developments. Provision is also made in the text under Section 11.10.4 for cycle parking for commercial developments. This includes for proposed amendments to Section 11.10.4 as per the recommendations of this Chapter.</p>
GLWC-C2-72 Land Development Agency	<p>Parking- greater flexibility at certain locations</p> <p>In relation to car parking standards, the LDA request that for locations where there is demonstrable evidence of proximity to community and social services, as well as serviced by public</p>	<p>CE Response</p> <p>All new development proposals will be subject to maximum car parking standards to achieve greater modal shift and promote sustainable transport patterns. Provision for flexibility of car parking provision is made for in Section 11.3 under Car Parking-General where there is demonstrable evidence in mixed use areas where mobility management measures are</p>

<p>transport and planned public transport, to allow for such locations to avail of greater flexibility and less significant parking requirements, in support of low carbon and sustainable development, independently of their designation within the residential neighbourhood classification.</p>	<p>deemed satisfactory as well as along existing and planned strategic public transport corridors depending on the prevailing level of service at that time.</p>
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Specific Development Standards		
GLWC-C2-173 Galway Cycling Campaign	<p>Sheltered cycle-parking</p> <p>Proposal: Amend wording in current cycle-parking standard to more clearly define situations when sheltered cycle-parking is needed.</p> <p>Suggested amendment in 11.10.4, p314:</p> <p>From: "11.10.4 [-existing text-] Cycle parking must be sheltered where appropriate."</p> <p>To: "11.10.4</p> <p>[-existing text-] A minimum of 50% of short-term cycle parking and all long-term cycle parking (3 hours or more) in new developments should be covered. [-existing text-]"</p> <p>Using a definition of long-term cycle-parking, which always needs shelter, compared to short-term parking, is a useful and objective metric which could be readily defined and applied to most developments. A minimum stay of 3 hours would cover schools, and places of employment, etc.</p>	<p>CE Response</p> <p>Section 11.10.4 of the plan currently states that "Cycle parking must be sheltered where appropriate". This is considered acceptable and allows for further consideration to be given to the detailed design of cycle stands during the planning application stage.</p>

GLWC-C2-127 Roselyn Carroll	Include provision of covered charging locations that are for ebikes and ecargo bikes in Table 11.6 to future proofing developments.	
GLWC-C2-173 Galway Cycling Campaign	<p>Cycle-parking spaces</p> <p>Proposal: Amend wording in cycle-parking standard to remove reference to car-parking spaces as the sole determining factor for the required number of cycle-parking spaces, and to adopt the recommendations from the established, national guidance manual for the required quantity of cycle-parking.</p> <p>Suggested amendment in 11.10.4, p314:</p> <p>From: "11.10.4 [-existing text-] In developments, where appropriate, a minimum of one cycle stand per 20 car spaces or over shall be provided. For every additional 50 car parking spaces, an additional cycle stand should be provided. [-existing text-] For commercial developments, the number of cycle stands shall be equivalent to 25% of the number of car parking spaces unless otherwise agreed in writing with the Planning Authority [-existing text-]."</p> <p>To: "11.10.4</p> <p>[-existing text-] In all developments not covered by 11.3.1 (h) or Table 11.3, the number of cycle-parking spaces should be provided according to National Cycle Manual guidance, Section 5.5.7, or as per any updates to this manual. [-existing text-]"</p>	<p>CE Response</p> <p>Concerns are noted. It is proposed to amend text in Chapter 11, Section 11.10.4 Cycle Parking to include for the minimum cycle parking spaces in accordance with Section 5.5.7 of the National Cycle Manual 2011, or any forthcoming replacement to these standards. It should be noted that Section 5.5.7 of the National Cycle Manual states that "more generous provision should be considered in district, town and city centres, around transport hubs and on campuses". The proposed 25 per cent of parking can be required to be increased at certain locations above these standards as specified in the National Cycle Manual.</p> <p>CE Recommendation</p> <p>Amend the second paragraph of Section 11.10.4 Cycle Parking to include text in green</p> <p>For commercial developments, the number of cycle stands shall be equivalent to 25% of the number of car parking spaces. If the development has reduced car parking spaces, the amount of spaces at a minimum shall meet the cycle parking spaces in accordance with Section 5.5.7 of the National Cycle Manual 2011, or any forthcoming replacement to these standards,unless otherwise agreed in writing with the Planning Authority and shall be located close to entrance points.</p>
GLWC-C2-119 Electricity Supply Board	11.10.2 - EVs - ESB ESB request that standards consistent with the Statutory Instrument No. 393/2021 –European Union (Energy Performance of Buildings) Regulations 2021	<p>CE Response</p> <p>Noted. Section 11.10.2 has been updated to reference the Statutory Instrument No. 393/2021 - European Union (Energy Performance of Buildings) Regulations 2021</p>

<p>be included in Section 11.10.2 Electric Vehicle (EV) Parking. (See p313).</p>	<p>CE Recommendation</p> <p>Amend Section 11.10.2 Electrical Vehicle (EV) Parking to delete strikethrough text and include text in green</p> <p>EV recharging infrastructure is required under shall meet the requirements of Statutory Instrument No. 393/2021 –European Union (Energy Performance of Buildings) Regulations 2021. the EU Energy Performance Regulations, 2021. These regulations require the are the minimum standards for EV charging points and infrastructure.</p> <p>1) Installation of recharging points for EV for both, new buildings and existing buildings undergoing major renovations for more than ten car parking spaces and ducting infrastructure (consisting of conduits for electric cables) for at least one in every 5 car parking spaces to enable the subsequent installation of recharging points for electric vehicles. New buildings or buildings undergoing major renovations (other than a dwelling) shall install at least one recharging point and ducting infrastructure for at least one in every 5 car parking spaces to enable the subsequent installation of recharging points for electric vehicles.</p> <p>2) New buildings or buildings undergoing major renovations (containing one or more than one dwelling), which has more than 10 car parking spaces, shall install ducting infrastructure for each car parking space to enable the subsequent installation of recharging points for electric vehicles.</p> <p>2) 3) For an existing building (other than a dwelling) with more than 20 car parking spaces, one, or more, recharging points will be required to be installed, before 1 January 2025.</p> <p>3) 4) New dwellings with on-site car parking should be developed with appropriate infrastructure (ducting) that enables future installation of a charging point for EVs.</p> <p>4) 5) Publicly accessible EV parking spaces should be clearly marked and be capable of communicating usage data with the National Charge Point Management System. EV parking spaces for disabled spaces should also be included developments.</p> <p>5) 6) Electric car charging points – 10% of communal and private spaces shall be adapted and suitable for Electric car (EV) chargers.</p> <p>The city will also install additional Council will also endeavour to install additional EV charging points for public spaces throughout the city having regard to the sensitivity of the locations. The Council will work are committed to work in conjunction with ESB networks and other service providers in the provision of charging points in public areas in the city, to ensure there are appropriate levels of electric charging infrastructure in place, including at public transport interchanges.</p>
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GLWC-C2-127 Roselyn Carroll	<p>11.3 Childcare Facilities</p> <p>Remove the term generally in the second sentence section 11.13, replace with must be.</p> <p>Include a requirement for provision for outdoor play areas for all childcare services. All children required outdoor space and this must be prioritised at planning stage.</p>	<p>CE Response</p> <p>Noted. Children's play area are accommodated for under Section 11.13.1 and shall accord with Section 28 Guidelines and shall accord with Section 4.13 Design Standards.</p>
GLWC-C2-38 Transport Infrastructure Ireland	<p>11.16 Fuel Filling Stations</p> <p>TII would welcome the inclusion of a policy position reflecting the requirements outlined in Section 2.8 of the DoECLG Spatial Planning and National Roads Guidelines relating to the provision of service areas and roadside facilities on national roads in the draft plan and the requirement for a forward planning approach to the provision of off-line motorway service areas at national road junctions.</p>	<p>CE Response</p> <p>Noted. It is considered that the requirement for the provision of off-line motorway service areas at national road junctions would not necessary policy to include in built up urban areas such as Galway.</p>
GLWC-C2-83 Noel Porter GLWC-C2-168 Brian Fitzsimons	<p>Cycle Parking Locations</p> <p>Include/Encourage Cycle parking preferably covered at all the following locations:</p> <ul style="list-style-type: none"> • All community centers (E.g. Renmore) • All sports grounds/Gaa Clubs (E.g Greyhound track, Castlegar GAA club etc.) • All business centers (E.g. Doughiska outside Joyces, Pharmacy, Galway east medical practice) currently not any official place to lock a bicycle. • Galway City owned and operated car parks at The Greyhound Track, College Rd, Dyke Road, Galway Cathedral Car Park, Mill Street and Bowling Green, Newtownsmith (should be upgraded to include facilitate 	<p>CE Response</p> <p>Comments are noted and agreed with. Add text to section 11.10.4 Cycle Parking as per recommendation.</p> <p>CE Recommendation</p> <p>Amend Section 11.10.4 to include text in green to the end of the second paragraph</p> <p>Provisions for cycle parking shall also be made at community centres, sports grounds and other recreational facilities and business centres. Inclusivity and accessibility should be considered in the design and location of all cycle-parking. In developments with more than 20 cycle-parking spaces, a minimum of 10% of spaces should be provided which are family and disability friendly, with spaces configured to accommodate cargo-bikes, tricycles, bikes with trailers, recumbent bikes and other non-standard cycles.</p>

	<p>forms of transport other than cars- push bikes, eBikes and cargo bikes).</p> <p>Outside all main shops/shopping areas.</p>	
GLWC-C2- 173 Galway Cycling Campaign	<p>Cycle Parking Stands- Additional Text proposed for design standards</p> <p>Proposal: Add new text to cycle-parking standard to more clearly define the acceptable design of cycle-parking stands in different circumstances. Suggested amendment in 11.10.4, p314:</p> <p>Add: "11.10.4 [-existing text-] All on-street stands or racks should be capable of performing the basic functions of supporting the bicycle and protecting it against theft or vandalism. Off-street storage/parking facilities should provide adequate shelter, lighting, safety and security, ease of access and egress, and an appropriate level of supervision.</p> <p>As such, publicly accessible cycle parking should be of Sheffield stand type; wheel-gripper racks or similar are not acceptable for publicly accessible cycle parking.</p> <p>Where high-density cycle parking is provided in a secure location, stacked cycle parking may be acceptable provided it is easily used and secure."</p>	<p>CE Response</p> <p>Noted. Provision is made for inclusivity and accessibility in the design of all cycle parking.</p> <p>CE Recommendation</p> <p>As per above recommendation. Amend Section 11.10.4 to include text in green to the end of the second paragraph as per response to submission 83</p>
GLWC-C2- 173 Galway Cycling Campaign	<p>More Inclusive Cycle Parking Text to Accommodate Non-standard Cycles</p> <p>Proposal: Add new text to cycle-parking standard to make provision for more inclusive cycle-parking to accommodate larger or non-standard cycles.</p> <p>Suggested amendment in 11.10.4, p314: [-existing text-] Inclusivity and accessibility should be considered in</p>	<p>CE Response</p> <p>Comments are noted and accepted. Text has been included as suggested to Section 11.10.4 to cater for more inclusive cycle parking. as per response to submission 83</p> <p>CE Recommendation</p>

	<p>the design and location of all cycle-parking. In developments with more than 10 cycle-parking spaces, a minimum of 10% of spaces should be provided which are family and disability friendly, with spaces configured to accommodate cargo-bikes, tricycles, bikes with trailers, recumbent bikes and other non-standard cycles."</p>	<p>Amend section 11.10.4 to include text in green to the end of the second paragraph second paragraph as per response to submission 83</p>
GLWC-C2-153 People Before Profit Galway	11.24 Access for All Suggestion to add text under 11.24 Access for All: Part M of the Building Regulations 2010, and Building for Everybody: A Universal Design Approach (National Disability Authority, 2012) sets out standards and best practice to ensure that buildings and the built environment are accessible and usable by everyone, including the elderly, people with disabilities and people with children. Further information available on the website of the National Disability Authority at www.nda.ie . In addition, the promotion of universal design is a general obligation under Article 4 (part f) of the UNCRPD.	CE Response Noted. Additional language was added to the preface Strategic Policy Framework to include for UN Convention on the Rights of Persons with Disabilities (UNCRPD). This is applicable across all sections of the plan and includes for universal design general obligations.
GLWC-C2-180 Access for All		
GLWC-C2-118 Ibuc	11.29 Student Accommodation The Development Plan must facilitate the upgrade and expansion of existing education facilities and the provision of new education facilities as required and the Students need access to affordable, quality, and safe accommodation throughout their college life. Housing for All and the National Student Accommodation Strategy explicitly call out the need for on-campus and/or close to campus specialist accommodation for students. This should be reflected in the Development Plan.	CE Response Noted. The draft plan supports the provision of high quality, professionally managed, purpose built student accommodation on/off campus at appropriate locations in terms of access to sustainable and public transport modes and third level institutes, in a manner that respects the residential amenities of the surrounding area as set out in Section 11.29 of the draft plan to meet defined student housing need. This section also references the Proposals for student accommodation should comply in general with the design standards promoted in the <i>Guidelines on Residential Development for Third Level Students</i> (DES 1999), the subsequent supplementary document (2005) and the Student Accommodation Scheme, (ORC 2007) and National Student Accommodation Strategy (2017) and Circular PI8/2016 unless superseded by new standards.

GLWC-C2-132 NUI Galway	<p>NUI Galway would welcome the inclusion of the following policy in the forthcoming Development Plan into Section 11.29:</p> <p>The use of Student Accommodation as temporary tourist accommodation will be considered outside the normal academic year.</p>	<p>CE Response</p> <p>Noted. National policy allows for the use of student accommodation as temporary tourist accommodation as provided for under Circular PL8 of 2016 and under Section 13 (d) of the Planning and Development Housing and Residential Tenancies Act 2016.</p>
GLWC-C2-230 Dept. Housing, Local Government and Heritage	<p>11.30 Climate - scheme sustainability statements</p> <p>Amend para. 2 of to allow for other large scale projects to be included in the text.</p>	<p>CE Response</p> <p>Comments are noted and text has been included in Section 11.30 to reflect this.</p> <p>CE Recommendation</p> <p>Amend Section 11.30 Climate Scheme Sustainability Statements to include text in green</p> <p>All planning applications involving developments of 25 or more homes or over 500sqm of gross retail, commercial/office development in urban areas; or enterprise and employment developments over 1,000m² gross and other projects as deemed appropriate should be accompanied by a Scheme Sustainability Statement.</p>
GLWC-C2-230 Dept. Housing, Local Government and Heritage	<p>11.33 Invasive Alien Species</p> <p>The Department recommend additional text in relation to 11.33 Invasive Alien Species to comply with the provisions of the European Communities Birds and Habitats Regulations 2011 (S.I. 477/2011).</p>	<p>CE Response:</p> <p>Noted. Add text to Section 11.33 Invasive Alien Species as proposed.</p> <p>CE Recommendation:</p> <p>Amend Section 11.33 Invasive Alien Species to include text in green</p> <p>On development sites, where invasive species are present, a control and management program for the protection against the particular invasive species, will be required as part of the planning process to comply with the provisions of the European Communities Birds and Habitats Regulations 2011 (S.I. 477/2011).</p>
GLWC-C2-230 Dept. Housing, Local Government and Heritage	<p>11.34 Ecological Impact Assessment (EclA)</p> <p>The Department recommend additional text in relation to 11.34 Ecological Impact Assessment (EclA) in relation to proposed developments likely to impact on locally important natural habitats and wildlife corridors.</p>	<p>CE Response</p> <p>Noted. Add text to Section 11.34 Ecological Impact Assessment as proposed.</p> <p>CE Recommendation</p> <p>Amend Section 11.34 Ecological Impact Assessment to include text in green</p>

		An Ecological Impact Assessment (EIA) will be required to be undertaken for proposed developments likely to impact on locally important natural habitats and wildlife corridors , developments proposed in areas that support, or have the potential to support, protected species or features of biodiversity importance, and that appropriate avoidance and mitigation measures are incorporated into all development proposals where the requirements of section 11.32 do not apply.
GLWC-C2- 178 An Post	<p>Operational Requirements for An Post</p> <p>Parking</p> <p>An Post transition to the use of environmentally sustainable vehicles, appropriate parking facilities are required to support same, with one EV parking station required per vehicle. This requirement is relatively specific to An Post and is of particular importance given that An Post operates an essential public service.</p> <p>Flexibility with car parking standards for postal facilities is requested. Postal facilities may require a greater quantum of car parking spaces going forward as postal trends continue to evolve, making it imperative that facilities are future proofed to ensure the long-term viability of An Post's operations.</p> <p>Deliveries & Access</p> <p>Restrictions on the times of deliveries/collections to/from An Post facilities, or any restrictions such as HGV bans on certain roads, could have a serious impact on the ability of An Post to meet the postal needs of the public and agreed service legal agreements with the State. It is requested that the Local Authority recognise this requirement as part of the Galway City Development Plan 2023-2029 and in the future assessment and preparation of planning policy for any Public Realm/Urban Area Plans.</p> <p>Engagement & Consultation</p>	<p>CE Response</p> <p>The CE notes the issues raised. In relation to access and parking requirements these are set out in Chapter 11 of the draft plan. At a planning application stage the required development standards should be met as set out. Where a deficiency is identified this will need to be suitably justified by the applicant and will be assessed on its own merits at the application stage. Public engagement and consultation will take place as part of any future Local Area/Public Realm/Urban Area Plan or Mobility Plan.</p>

<p>Request that Galway City Council engage with An Post should any future Local Area/Public Realm/Urban Area Plan or Mobility Plan, including the Galway Transport Strategy (GTS), propose to amend delivery hours or restrict HGV movements in the City Centre. It is important that a sufficient level of vehicular access is maintained, and that sufficient loading bay space is provided to accommodate the collection and delivery of mail and to accommodate customers who require use of a vehicle to visit an An Post facility.</p>	
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Chapter 11 (b): Recommendations

1. Amend Table 11.2: Indicative Examples of Recreational Facilities for Different Sizes of Residential Developments to delete ~~strikethrough~~ text and include text in green

Number of Residential Units	Examples of Recreational Facilities
0-10	No recreation facility required but green infrastructure at a minimum <ins>Informal play areas with seat and natural features at appropriate scale to amenity and recreational facility and to include green infrastructure</ins>
11-20	Seating, Picnic infrastructure, informal play areas <ins>Natural play equipment/natural play area, teen area with seating, picnic infrastructure</ins>
21-50	Play Equipment, Kick About Area, Formal Garden <ins>Small playground, kick about area, landscaped garden/small park</ins>
51-100	Skateboard Facility, Bowling Green, Basketball Court <ins>MUGA, outdoor gym, self-directed play (may include skateboard or other equipment)</ins>
100+	Play Ground, Playing Pitch, Formal Park <ins>Large playgrounds for all ages, playing pitch, landscape park</ins>

2. Amend Section 11.10.3 Travel Plans to delete ~~strikethrough~~ text and add text in green

In line with the threshold indicated in the Department of Transport's ~~Smarter Travel A Sustainable Transport Future 2009-2020 National Sustainable Mobility Policy~~ and NTA guidance Achieving Effective Workplace Travel Plans – Guidance for Local Authorities, the Council requires local transport plans to be prepared for all large development proposals. Transport plans may also be requested if an existing or proposed development has the potential to employ over 100 people. Travel Plans are also required for all schools and for residential developments of 100 dwellings or more.....

3. Amend Section 11.10.3 Travel Plans to include the text in green to create a new fourth paragraph
Complementary measures such as Area Based Transport Assessments (ABTA) and Traffic and Transport Assessments (TTA) are required for Local Area Plans (LAP's) and can also be considered on Masterplans and Framework Plans, where the scale of development determines the need for integrated land use and transport planning policies. A Traffic and Transport Assessment will include for a comprehensive review of all the potential transport impacts of a proposed development or re-development, with an agreed plan to mitigate any adverse consequences and should be carried out in accordance with **Traffic & Transport Assessment Guidelines PE-PDV-02045 May 2014**. The preparation of ABTAs should include for an assessment process focused on understanding transport needs and land use integration, used in the preparation of Local Area Plans, planning schemes and masterplans and shall be carried out in accordance with **Area Based Transport Assessment (ABTA) Guidance Notes PE-PDV-02046 April 2018** and supplementary ABTA How to Guide, Guidance Document, Pilot Methodology (2021). There shall also be a requirement for the principles of DMURS to be applied to Local Area Plans, Masterplans and Framework Plans taking into account street design based on the street classification and measures for cyclist and pedestrians to promote placemaking as set out in Section 11.3.1 (b) of the plan.

4. Amend the second paragraph of Section 11.10.4 Cycle Parking to include text in green

For commercial developments, the number of cycle stands shall be equivalent to 25% of the number of car parking spaces. If the development has reduced car parking spaces, the amount of spaces at a minimum shall meet the cycle parking spaces in accordance with Section 5.5.7 of the National Cycle Manual 2011, or any forthcoming replacement to these standards, unless otherwise agreed in writing with the Planning Authority and shall be located close to entrance points.

5. Amend Section 11.10.2 Electrical Vehicle (EV) Parking to delete ~~strikethrough~~ text and include text in green

EV recharging infrastructure is required under shall meet the requirements of Statutory Instrument No. 393/2021 –European Union (Energy Performance of Buildings) Regulations 2021. the EU Energy Performance Regulations, 2021. These regulations require the are the minimum standards for EV charging points and infrastructure.

- 1) Installation of recharging points for EV for both, new buildings and existing buildings undergoing major renovations for more than ten car parking spaces and ducting infrastructure (consisting of conduits for electric cables) for at least one in every 5 car parking spaces to enable the subsequent installation of recharging points for electric vehicles. New buildings or buildings undergoing major renovations (other than a dwelling) shall install at least one recharging point and ducting infrastructure for at least one in every 5 car parking spaces to enable the subsequent installation of recharging points for electric vehicles.
- 2) New buildings or buildings undergoing major renovations (containing one or more than one dwelling), which has more than 10 car parking spaces, shall install ducting infrastructure for each car parking space to enable the subsequent installation of recharging points for electric vehicles.
- 2) 3) For an existing building (other than a dwelling) with more than 20 car parking spaces, one, or more, recharging points will be required to be installed, before 1 January 2025.
- 3) 4) New dwellings with on-site car parking should be developed with appropriate infrastructure (ducting) that enables future installation of a charging point for EVs.
- 4) 5) Publicly accessible EV parking spaces should be clearly marked and be capable of communicating usage data with the National Charge Point Management System. EV parking spaces for disabled spaces should also be included developments.
- 5) 6) Electric car charging points – 10% of communal and private spaces shall be adapted and suitable for Electric car (EV) chargers.

The city will also install additional Council will also endeavour to install additional EV charging points for public spaces throughout the city having regard to the sensitivity of the locations. The Council will work are committed to work in conjunction with ESB networks and other service providers in the provision of charging points in public areas in the city, to ensure there are appropriate levels of electric charging infrastructure in place, including at public transport interchanges.

6. Amend Section 11.10.4 Cycle Parking to include text in green to the end of second paragraph

Provisions for cycle parking shall also be made at community centres, sports grounds and other recreational facilities and business centres. Inclusivity and accessibility should be considered in the design and location of all cycle-parking. In developments with more than 20 cycle-parking spaces, a minimum of 10% of spaces should be provided, until superseded by the update of the National Cycle Manual, which are family and disability friendly, with spaces configured to accommodate cargo-bikes, tricycles, bikes with trailers, recumbent bikes and other non-standard cycles.

7. Amend Section 11.30 Climate Scheme Sustainability Statements to include text in green

All planning applications involving developments of 25 or more homes or over 500sqm of gross retail, commercial/office development in urban areas; or enterprise and employment developments over 1,000m² gross and other projects as deemed appropriate should be accompanied by a Scheme Sustainability Statement.

8. Amend Section 11.33 Invasive Alien Species to include text in green

On development sites, where invasive species are present, a control and management program for the protection against the particular invasive species, will be required as part of the planning process to comply with the provisions of the European Communities Birds and Habitats Regulations 2011 (S.I. 477/2011).

9. Amend Section 11.34 Ecological Impact Assessment (EclA) to include text in green

An Ecological Impact Assessment (EclA) will be required to be undertaken for proposed developments likely to impact on locally important natural habitats and wildlife corridors, developments proposed in areas that support, or have the potential to support, protected species or features of biodiversity importance, and that appropriate avoidance and mitigation measures are incorporated into all development proposals where the requirements of section 11.32 do not apply.

10. Amend text in Section 11.3.1(g) Car Parking Standards to add text in green. (This is from Chapter 4 in response to NTA Submission No.141)

“Group car-parking spaces shall not be allocated to individual residential units within residential developments and such grouped car-parking spaces shall be made available for all inhabitants/ visitors of the development.”

Appendices

Appendix 1 – Implementation and Monitoring		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-148 Galway City Community Network	Implementation The plan must include specific targets, indicators and timescales and put in place associated participative monitoring structures and processes to guarantee implementation. There is no description of monitoring and implementation methodology. Recommend that objectives of the plan follow SMART approach. Concern that aspects of the plan may not be implemented as are contingent on sourcing suitable funding.	CE Response Similar concerns were expressed in the OPR submission in observation 7. The CE response and recommendation to observation 7 of the OPR submission also addressed this issue. This states the following: The local authority recognises the importance of monitoring the implementation of the any plan or programme. Appendix 1: Implementation and Monitoring will be amended to provide a comprehensive list of indicators that will support monitoring in order to assess the success with which the development plan is being implemented. This will take into account section 10 of the Draft Development Plans, Guidelines for Planning Authorities (2021) which sets out a comprehensive list of indicators to be monitored and reported on, on an annual basis. It is anticipated that best practice will require a matrix-based framework approach to monitor implementation of the plan, similar to the approach proposed in the Draft Dún Laoghaire-Rathdown County Council plan. The local authority is committed to the establishment of this ongoing monitoring system for the development plan as a permanent function, within the organisation. Provisions for Core Strategy Monitoring are set out in the draft plan and will take place annually in accordance with the requirements as set out in Section 10.3.1 of the draft Development Plans, Guidelines for Planning Authorities. The monitoring process will also inform Galway City Council's two year review of the City Development Plan on progress securing Plan objectives (Section 15(2) Planning and Development Act). The monitoring reports will include for assessment of the consistency and alignment with pertinent objectives within the Regional Spatial and Economic Strategy, Galway Metropolitan Area Strategic Plan and Galway Transport Strategy. The monitoring strategy will also include any significant environmental effects of the implementation of the Development Plan (as per Article 10 of SEA Directive and also demonstrate alignment UN Sustainable Development Goals. It is however not possible or prudent to include for full details and to finalise the approach at this stage, as the Core Strategy, strategic and other development
GLWC-C2-196 COPE Galway		
GLWC-C2-127 Roselyn Carroll		

	<p>objectives, plan text and land-use zoning maps are subject to change before the final plan stage.</p> <p>In addition to the response to OPR, text in Section 1.10 Implementation of the draft plan that also references that the monitoring and implementation will require direct engagement with other key stakeholders, including community interests such as the Galway City Community Network (as amended in Chapter 1 recommendations) and investment interests, ultimately with the objective of timely decision making and exploration in innovative problem solving. With a focus on the monitoring of the Core Strategy and the Development Plan policies and objectives, a dynamic approach to delivery is more likely and this can enable a link to be established with the concurrent SEA monitoring requirements. Such an approach can link in more seamlessly with the RSES auditing and NPF target reviews.</p> <p>CE Recommendation</p> <p>As per Observation 7 Response to the OPR – Implementation and Monitoring –</p> <p>Amend Appendix 1: Implementation and Monitoring by committing to the following range of implementation and monitoring regime to be included for in Appendix 1 following completion of the plan making process.</p> <p>Appendix 1- Implementation and Monitoring will include for a comprehensive list of indicators to be monitored in accordance with best practice, including for the draft Development Plans, Guidelines for Planning Authorities Consultation Draft (August 2021), with the objectives within the National Planning Framework, Regional Spatial and Economic Strategy, Galway Metropolitan Area Strategic Plan and Galway Transport Strategy in addition to the SEA and UNSDG's in order to assess the success with which the development plan is being implemented.</p>
GLWC-C2-148 Galway City Community Network	<p>Request that as the Public Participation Network for Galway City, GCCN be named as a key stakeholder as provided for in the Local Government Reform Act 2014.</p> <p>CE Response</p> <p>Comment noted. Policy 7.1.1 General Policies in Chapter 7: Community and Culture has been amended to make reference to the GCCN as a key stakeholder.</p> <ol style="list-style-type: none"> 1. Support and facilitate the sustainable development of community, social and cultural infrastructure in collaboration with key stakeholders, including community stakeholders such as the Galway City Community Network, that

		<p>affords inclusive opportunities for everyone to shape their own lives, enables communities to realise their full potential and that contributes to a high quality of life and wellbeing for all who live work and visit the city.</p> <p>CE Recommendation</p> <p>As per recommendation in Chapter 7 for policy 7.1.1 specific reference has been made to the GCCN as a community stakeholder.</p>
GLWC-C2-196 COPE Galway	Request that public consultation be carried out prior to the adjustment of the Housing Strategy (based on 2 year review).	<p>CE Response</p> <p>The two year report must also include a review of the progress achieved in implementing the Housing Strategy and, where the report indicates that new or revised housing needs have been identified, the Chief Executive may recommend that the Housing Strategy be adjusted and that the Development Plan be varied accordingly. If a variation to the Development Plan takes place public consultation is part of the statutory process as set out in Section 13 of the Planning and Development Act.</p>
GLWC-C2-176 Kevin Jennings GLWC-C2-145 Galway Chamber	<p>Implementation and Targets</p> <p>Current and previous plans contain a range of objectives that have not been implemented.</p> <p>Progress on implementation and clear targets should be set out.</p> <p>Local Authority should be enabled through government funding to implement all objectives.</p> <p>Plans should be extended to correspond with RSES to enable greater co-ordination of implementation.</p> <p>Amalgamation with County Council and directly Elected Mayor would enhance progress on implementation.</p>	<p>CE Response</p> <p>Two year progress reviews of the plan are required to be carried out in accordance with the Planning and Development Act (as amended). These reports include progress updates on the objectives of the development plan which relate to Environment, Parks, Recreation and Amenity, Transportation, implementation updates on the Core Strategy and the Housing Strategy and the Strategic Environmental Assessment and Natura Impact Report Monitoring of Implementation of the Plan. There is also reporting on the Planning and Cross Departmental Objectives in the plan.</p> <p>Matters in relation to plan timescale, funding, amalgamation and position of mayor are very important issues for the city but are outside of the scope of the development plan. It is acknowledged that many objectives are longer term than the development plan cycle and can also be subject to funding.</p> <p>A welcome change in funding structures is evolving under that allocations under the URDF, which the City Council has been a successful applicant, this funding can enable the delivery of strategic objectives. Included to date in this funding is provision for the ongoing upgrading of the Martin Junction, which will consequently contribute to enabling the development of Ardaun and sustainable transport measures; cycle networks designs and upgrade and modernization of Ceannt Station.</p>

	<p>The GTS does not have any targets for modal shift. The city should set such targets. The GTS has delivered very little since 2016.</p> <p>A range of data should be collected and published to inform decisions.</p>	<p>There is a whole range of other projects which are being advanced under other various funding streams such as the new Salmon Weir pedestrian and cycle bridge; the Wolfe Tone pedestrian bridge; the Cross City Link, Dublin Road Bus Corridor Scheme and various active travel measures.</p> <p>The GTS is in its sixth year of a 20-year plan and while still in its infancy, the projects and objectives in this plan remain relevant for Galway City over the lifetime of this plan, with various implementation timeframes set out as short, medium and long term for the projects. The implementation of the GTS is being supported through service delivery plans funded predominately by the NTA and TII. The forthcoming review of the GTS, due to commence in 2022 and be completed in 2023 in conjunction with Galway County Council and the National Transport Authority (NTA), will consider all transport modes, including the feasibility of light rail and will provide an opportunity to include for targets to be reviewed. Galway City Council is committed to monitoring the progress of interventions during the lifetime of this Development Plan with a key benchmark being the ambition for a periodic review of car parking standards in tandem with public transport and Active Travel improvements. The implementation of transport improvements listed in GTS is not exclusively the responsibility of the Planning Authority but also lies within the remit of the TII, NTA and the relevant transport providers.</p>
GLWC-C2-147 Galway City Community Network	<p>Monitoring UN SDGs</p> <p>Submission includes for a sample of 6 chapters to demonstrate how the Global Framework of Indicators can be used to in measuring goals/progress. It is necessary to integrate relevant indicators in all chapters of the plan. Submission acknowledges that UN SDG Global Framework is not entirely scalable to the Galway City Development Plan 2023-2029 as some indicators are the remit of national government and policy and others that are more relevant to the global south.</p>	<p>CE Response</p> <p>Comments are noted. Each chapter includes for the relevant Sustainable Development Goals (SDGs) that ally to those chapters. The Council is in agreement that the UN SDG Global Framework is not entirely scalable to the Galway City Development Plan as some indicators are in the remit of the national government and policy, while others are more relevant to the global south. Appendix 1- Implementation and Monitoring of the Final Plan will align with the objectives of the National Planning Framework (NPF), Regional Spatial and Economic Strategy (RSES), the Galway Area Metropolitan Plan (MASP), Galway Transport Strategy (GTS) and the United Nations Sustainable Development Goals (UN SDGs) in addition to the SEA in order to assess the success with which the development plan is being implemented.</p>

Appendix 2 – Statement of Compliance with Ministerial Guidelines

Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-42 OPW	OPW- Planning Circular PL02/2014 The Planning Circular PL02/2014 should be listed in Appendix 2 – Statement of Compliance with Ministerial Guidelines.	<p>Response</p> <p>Noted. This circular gives further advice on the Flood Risk Management Guidelines and use of OPW mapping in assessing planning applications and clarifies the advice given in the 2009 guidelines for planning authorities: The Planning System and Flood Risk Management.</p> <p>Recommendation</p> <p>Amend Appendix 2- Statement of Compliance with Ministerial Guidelines, Table – Section 28 Guidelines to insert text in green</p> <p>The Planning System and Flood Risk Management- Guidelines to Planning Authorities and Technical Appendices (2009) and Planning Circular PL02/2014 Flood Guidelines.</p>

Appendix 5 - Inventory of Public Rights of Ways

It is proposed to include an Inventory of Public Rights of Ways in the city, as set out below.

Ref.	Location	Description
PROW 01	Salmon Weir Bridge – Wolfe Tone Bridge	Along the bank separating the River Corrib from the mill race
PROW 02	Mill Street Car Park – Dominick Street Lower	Through Ruxton Court onto Dominick Street Lower
PROW 03	Mill Street Car Park – Mill Street	Through Mill Street Car Park and along the canal bank to bridge at Mill Street
PROW 04	Water Lane	From Water Lane to St. Bridget's Place Lower
PROW 05	West Bank of Eglington Canal – University Road	Along canal tow-path from University Road to gate at Áras na Mac Léinn, NUIG campus
PROW 06	Newcastle	From private road within NUIG grounds to bank of River Corrib.
PROW 07	Woodquay – Dyke Road	From Riverside, Woodquay along the old Clifden railway embankment to Dyke Road
PROW 08	Tievegariff, Taylor's Hill	From Glenarde Crescent to Taylor's Hill Road
PROW 09	Lenaboy, Salthill	From Devon Park to Lenaboy Park
PROW 10	Lenaboy, Salthill	From Emerson Avenue to Lenaboy Park
PROW 11	Lenaboy, Salthill	From Monksfield Avenue to Oaklands
PROW 12	Dalysfort Road, Salthill	From San Antonio Terrace to Dalysfort Road, to the south of a terrace of eight houses
PROW 13	Dalysfort Road, Salthill	From Rockhill to Dalysfort Road, along lane between a terrace of eleven houses and a terrace of five houses
PROW 14	Dalysfort Road, Salthill	From Rockhill to Dalysfort Road, north of a terrace of five houses
PROW 15	Árd na Mara - Rockbarton Road, Salthill	From cul-de-sac at Árd na Mara to Rockbarton Road adjacent to Dr. Mannix Road
PROW 16	Upper Salthill	From public road at junction of Grattan Road and Salthill Road Upper along east side of Grattan House
PROW 17	Foreshore at Claddagh - Salthill	From Nimmos Pier along promenade to Blackrock
PROW 18	Rahoон	From Rahoon Road along Millers Lane, crossing Western Distributor Road to Manor Drive
PROW 19	Lough Atalia	From Lakeshore Drive along seashore surrounding Lough Atalia to railway bridge on Lough Atalia Road
PROW 20	Renmore	From Renmore Road to foreshore along lane to east of Renmore Barracks
PROW 21	Knocknacarra	Barna Road to Shangort Road
PROW 22	Knocknacarra	Clybaun Road to the Western Distributor Road
PROW 23	Salthill	From Blackrock along the seafront towards Blake's Hill

PROW 24	Claddagh	Causeway to Mutton Island
PROW 25	Claddagh	Through Fr. Burke Park
PROW 26	City Centre	Wolfe Tone Bridge to Claddagh Quay
PROW 27	City Centre	Along by Eglington Canal to Dominick Street
PROW 28	City Centre	Canal Road Upper through to Canal Road Lower
PROW 29	City Centre	Pedestrian and cycle way at Fisheries Field
PROW 30	Renmore	Linkages from Wellpark to the Dublin Road
PROW 31	Renmore	Linkages from Wellpark to the Dublin Road
PROW 32	Renmore	Linkages from Wellpark to the Dublin Road
PROW 33	Renmore	St Oliver Plunkett Church Renmore to Dublin Road.
PROW 34	Renmore	Ballyloughaun/Murrough areas

Appendix 6 – Infrastructure Capacity/Constraints Study

It is proposed to include a broad Infrastructure Capacity/Constraints Study as per response to **Recommendation 3** of OPR submission.

Response to Recommendation 3 – Tiered Approach to Zoning has been provided for in proposed amendments

Proposed amendments have been made to the settlement hierarchy, capacity yield, and Core Strategy. Proposed amendments and associated classification of phasing addresses the requirement for a Tiered approach in addition to further clarification as proposed in changes to text in Chapter 1. A proposed recommendation for inclusion of a broad Infrastructure Capacity/Constraints Study is also recommended to be included in the appendices of the DCDP.

Specifically regarding the OPR requirement to provide for a ‘reasonable estimate’ of the full costs as per NPO 72b of the specified services to be included in relation to infrastructure. The local authority has a number of concerns and challenges in providing such information. This includes the dearth of any guidance and methodology for carrying out this assessment including for no definition of what is considered a ‘reasonable estimate’ of the costs. Large infrastructure projects are required to follow a structured procedure from preliminary design, to detailed design, to consent before arriving at ‘reasonable estimate’ of costs. This is most relevant to the strategic IW infrastructure projects, NTA and TII projects. It is also relevant to the range of measures included for in the GTS which are advancing from design to project stage. In view of this the local authority is not in a position to provide a set of costs that it would consider to be reasonable. In addition, other issues such as confidentiality, data protection, procurement rules, inflation rates, volatile construction costs also have to be considered, particularly for larger projects. Irish Water specifically stated when queried that they are not in a position to provide these costs and reiterated that this has already been conveyed to the Department and the OPR. Taking the foregoing into account an estimate for the costs of the delivery of infrastructure is not feasible to be included in the assessment as the local authority is not in a position to provide a ‘reasonable estimate’ given the number of uncertain variables.

Environmental Assessments

SEA		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-15 Environmental Protection Agency	<p>EPA Submission</p> <p>References and attaches the guidance document 'SEA of Local Authority Land Use Plans- EPA Recommendations and Resources' to take into account and incorporate the relevant recommendations, in finalising and implementing the plan.</p> <p>GCC should ensure plan aligns with key relevant higher-level plans and policy commitments of the NPF and NWRSES.</p> <p>Comments on the Environmental Report relating to 1) Non-Technical Summary-merit 2) Mitigation Measures 3) Monitoring- The Monitoring Programme should be flexible and take account of specific environmental issues and unforeseen adverse impacts, should they arise.</p> <p>Future amendments to the plan should be screened for likely significant effects, using the same method of assessment applied in the "environmental assessment" of the Plan.</p> <p>Once plan is adopted an SEA Statement- "Information on the Decision" should be prepared in accordance with the guidance provided. A copy of the SEA Statement should be sent to any environmental authority consulted during the SEA process.</p>	<p>CE Response</p> <p>This submission is noted.</p> <p>In relation to Non-Technical Summary and provision of maps, this can be added to the final SEA Environmental Report as appropriate.</p> <p>Mitigation measures were identified for significant effects. Monitoring- thresholds are provided in the introduction to this chapter but noted and may be expanded upon prior to plan adoption.</p> <p>Future amendments will be screened and an SEA statement will be prepared once the plan is adopted in accordance with EPA guidance.</p>
GLWC-C2-167 Save Roscam Peninsula	<p>Figures 4.5 and 4.24-inaccuracies in draft SEA</p> <p>With reference to the review of the current 2017-2023 Galway City development plan and the 2023-2029 draft development plan.</p> <p>The draft SEA for the draft development plan 2023-2029 contains errors made in the legends of some of the Figures where the Roscam Peninsula is included:</p>	<p>CE Response</p> <p>These are noted and the SEA Environmental Report will be corrected and updated.</p>

	<p>Figure 4.5: lands on the Roscam Peninsula are not zoned residential amenity</p> <p>Figure 4.24: the protected views at Roscam, V 9, included in the draft plan are panoramic views and not linear views as show in the Figure included in the draft SEA.</p>	
GLWC-C2-202 Galway City Early Years sub-committee of CYPSC	<p>Health and Wellbeing</p> <p>Incorporate health considerations as part of environmental assessments to assess the health and wellbeing impact assessments of proposals and initiatives</p> <p>Consult and engage with HSE and other stakeholders to assess health and wellbeing impacts.</p>	<p>CE Response</p> <p>This is noted, the SEA has considered issues of human health in Section 4.</p> <p>Health and wellbeing impact assessments are not a requirement for development proposals. For certain developments where an Environmental Impact Statement is required, impact on human health is a parameter for assessment. Planning applications for such developments are referred to a range of prescribed bodies who are stakeholders.</p>
GLWC-C2-230 Dept. Housing, Local Government and Heritage	<p>SEA Monitoring</p> <p>The department suggests how improvements to monitoring can be undertaken, including through mapping and data sources, use of audits and indicators/targets.</p> <p>In relation to Greenways and cycleways there should be uniformity in objective across the different chapters of the plan, and will be required to undergo environmental assessments</p>	<p>CE Response</p> <p>This is noted and will be include in the final monitoring provided in the SEA statement upon adoption of CDP as appropriate and relevant.</p> <p>This is noted. Policy 5.2 Protected Spaces: Sites of European, National and Local Ecological Importance is the guiding policy for all plans and projects setting out the requirements to undertake appropriate assessment.</p> <p>The Core Strategy of the plan also includes specific policy in Policy 1.4 Core Strategy to support the implementation of the SEA Directive, the Habitats Directive, Birds Directive, EIA Directive and Water Framework Directive and appropriate supporting legislation and guidelines.</p>

GLWC-C2-179 Department of the Environment, Climate and Communications	GSI maps GSI recommend the ongoing use of Geological Survey Ireland's maps and datasets within the Development Plan and SEA report.	CE Response This is noted
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SFRA		
Submission No.	Submission Summary	CE Response and Recommendation
GLWC-C2-42 OPW	<p>OPW-SFRA and Policy</p> <p>Historic Flood Events & Pluvial Mapping - Table 4-1 in the SFRA references historic flood events from www.floodmaps.ie, and a footnote for discussion on pluvial flooding in section 4.2.4 of the SFRA references a national set of pluvial flood maps at www.cfram.ie/pfra. Please note that these websites are no longer available. Historic flood events are now available on www.floodinfo.ie.</p> <p>Justification Tests- OPW welcomes the inclusion of Plan-making Justification Tests supplied in the SFRA.</p> <p>There are proposed land use zonings, some of which are classified as highly vulnerable development in the Guidelines which overlap with Flood Zones A and B, for which no commentary has been included to indicate that the Plan Making Justification Test has been applied and passed. Examples of these include lands zoned Institutional & Community (CF) which allows highly vulnerable development to the south of Dún Na Mara Drive, and highly vulnerable Low Density Residential (LDR) to the south of Coast Road near Curragreen.</p> <p>For sites that are intended to be zoned for development following the application of a Justification Test where only a small proportion of the site is at risk of flooding, a policy objective might be attached to such zoning. Such an objective might require that the sequential approach be applied in</p>	<p>CE Response</p> <p>These comments are noted. The SFRA Report is updated although reference to the PFRA pluvial mapping remains as this was undertaken in the previous iteration of the Development Plan and still remains valid, with the same caveats that are in the SFRA.</p> <p>The SFRA Report has been updated to include Justification Tests for the following areas / sites. For clarity, the Justification Tests have also been brought into the main body of the SFRA from the Appendix, where Parts 1, 2 and 3 can be read as one collected commentary for each site / area:</p> <ul style="list-style-type: none"> • Existing residential across the city • CI at Salthill • Nuns Island Masterplan Area • Waterworks site • Clarification added that Lough Atalia does not require JT • LDR lands, Murrough • CF zoning at Father Griffin Road • I zoning at Galway Harbour Enterprise Park • CF zoning at Renmore Barracks. <p>With regard to CF zoned lands south of Dún Na Mara Drive, these are lands to the rear of Renmore Barracks. A portion of</p>

<p>the site planning, whereby to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development such as Open Space would be permitted for the lands which are identified as being at risk of flooding within that site.</p> <p>Planning permission for these sites might then be subject to the sequential approach having been adopted and applied as above, following a detailed FRA.</p>	<p>these lands are identified as at flood risk. It is deemed appropriate in this regard to amend the specific objective in relation to these lands set out in Section 11.2.1.</p> <p>CE Recommendation</p> <p>It is recommended by the CE that additional text in green is included in Chapter 11, Section 11.2.1 to address flood risk within this area as follows:</p> <p><i>CF lands south of the railway line at Renmore occupied by the Defence Forces comprising approximately 9 hectares. The Council will consider the development of these lands for institutional, amenity or community facilities use either by the Defence Forces or another institution and will not permit residential, commercial or industrial development. Any development shall not impact on lands which have been identified as at flood risk and a site specific flood risk assessment will be required as part of any development.</i></p> <p>It is also recommended that the SFRA Report is updated to include additional Justification Tests.</p> <p>With regard to LDR zoned lands at Curragrean. The SFRA has been updated to include a justification test for existing residential zoned lands. It is noted that chapter 11 Fig. 11.24 states that development shall be restricted to two houses only. These houses have been granted permission (Pl ref: 17/25 and 21/87) fronting onto the Coast road away from the flood zone and one house has been constructed to date.</p> <p>CE Recommendation</p> <p>It is recommended by the CE to ensure consistency with section 11.27 of the draft Plan to amend Policy 9.1 Flood Risk as follows:</p> <p><i>Ensure the recommendations of the Strategic Flood Risk Assessment (SFRA) for the Galway City Development Plan 2023-2029 are taken into consideration in the assessment of</i></p>
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		<i>developments in identified areas of flood risk. And Require site specific Flood Risk Assessment (FRA) and associated design and construction measures appropriate to the scale and nature of the development and the risks arising, in all areas of identified flood risk where appropriate including on sites where a only small proportion of the site is at risk of flooding and adopt a sequential approach in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009).</i>
GLWC-C2-42 OPW	OPW-National Indicative Fluvial Mapping (NIFM)- indicative Maps The OPW National Indicative Fluvial Mapping (NIFM) has been used as a dataset in producing the flood risk mapping. While these maps are an improvement on PFRA mapping, they are still indicative maps and the same cautions and limitations as outlined in Circular PL 2/2014 for PFRA should be followed.	CE Response This is noted, the NIFM has only been used in a small part of the city and an appropriate degree of caution has been applied in regard to zoning decisions in this area.
GLWC-C2-42 OPW	OPW- National Coastal Flood Hazard Mapping It is noted that datasets listed in Table 4-1 which relate to coastal flooding have not included the National Coastal Flood Hazard Mapping. These flood maps, including those for potential future scenarios taking account of the possible impacts of climate change, may be obtained in GIS format from the OPW Flood Risk Management - Data Management Section via email (flood_data@opw.ie).	CE Response The National Coastal Flood Hazard Mapping has been reviewed and a decision has been made to continue to use the CFRAM Study outputs to delineate the coastal elements of the Flood Zones.
GLWC-C2-42 OPW	Construction, Replacement or Alteration of Bridges and Culverts over Watercourses It should be noted that there are restrictions on the construction, replacement or alteration of bridges and culverts over any watercourse, and that appropriate consent from the Commissioners is required under Section 50 of the Arterial Drainage Act 1945.	CE Response To address this issue, additional text is proposed in green to Section 5.10.7 of the SFRA. CE Recommendation Amend the SFRA and insert Section 5.10.7 as follows (outlined in green): Bridges, culverts and weirs Where a planning application includes proposals to amend an existing bridge, culvert or weir, or introduce a new in-channel structure, it will be necessary for the applicant to seek OPW's

		approval under Section 48 (weirs) and Section 50 (bridges and culverts) of the Arterial Drainage Act 1945. It should be noted that OPW approval under Section 48 and / or 50 does not influence or determine the outcome of the Planning Application process.
GLWC-C2-42 OPW	Mitigation Measures at Site Design The Flood Mitigation Measures at Site Design outlined in Section 5.10 of the SFRA are welcomed by the OPW and provide guidance on how residual flood risk can be managed to acceptable levels.	CE Response This is noted
GLWC-C2-42 OPW	OPW-SUDS and SFRA The Guidelines recommend that the SFRA provide guidance on the likely applicability of different SuDS techniques for managing surface water runoff at key development sites, and also that the SFRA identifies where integrated and area based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.	CE Response This submission is noted. It is not possible within the timelines associated with the development plan process to include in the SFRA the extensive approach as suggested by the OPW. The SFRA and the draft plan includes guidance on SUDS and development standards are included in Chapter 11 to deal with discharge of surface water on a case by case basis.
GLWC-C2-42 OPW	OPW- Applications for Development in Areas at Risk of Flooding The OPW welcomes the guidance for all development proposals in Section 5.9 of the SFRA, which is provided in a clear and concise format, in the form of a checklist.	CE Response This is noted
GLWC-C2-42 OPW	OPW- Consideration of Climate Change Impacts & Mapping OPW welcomes the discussion on climate change in the SFRA and in particular: the consideration of future scenarios when assessing flood risk and the allowance for climate change in setting finished floor levels. However, this discussion is focused on incorporating climate change into development design, and the Draft Plan has not addressed how climate change has been considered in the production of this development plan.	CE Response This is noted. Chapter 2 sets out how climate change has been considered in the draft plan. In particular section 2.4 sets out how climate action is integrated into the plan. CE Recommendation Amend the SFRA Section 5.8 Climate Change to insert the following text in green:

	<p>-Planning authorities can consider climate change impacts in the Plan-making Stage, such as by avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences, and setting specific development management objectives. It should be noted that the flood maps prepared under the CFRAM, NIFM, NCFHM and ICPSS Programmes include maps for two potential future scenarios taking account of different degrees of climate impact. Consideration might be given to policy objectives in relation to climate change and flood risk.</p>	<p>The impact of climate change on flood risk has been considered from both a plan making and development management perspective as part of the preparation of this SFRA. As part of the specific assessment of risks to each regeneration and opportunity site, and other zoned areas of the city a commentary has been included in the relevant part of Section 7.</p> <p>The draft plan in particular in Chapter 9 includes policy in relation to flood risk. All zoning objectives have been considered and assessed in relation to flood risk and appropriate mitigation includes where necessary.</p>
GLWC-C2-42 OPW	<p>OPW-Planning Circular PL02/2014</p> <p>-Several of the flood risk assessments for specific areas in section 7 of the SFRA reference that justification tests are required “As required by the Planning Circular PL15/02”. The Planning Circular should be corrected to PL02/2014. This planning circular should also be listed in Appendix 2 – Statement of Compliance with Ministerial Guidelines.</p>	<p>CE Response</p> <p>This is noted and the report will be updated.</p>
GLWC-C2-42 OPW	<p>OPW - Ceannt Station</p> <p>The commentary on this area states that “Flood mitigation measures were incorporated in the site specific flood risk assessment of current development proposals”. In order to pass Part 3 of the Plan Making Justification Test, structural or non structural measures must be outlined to demonstrate that flood risk can be mitigated to an acceptable level.</p>	<p>CE Response</p> <p>It should be noted that the boundary of the Ceannt Station site was incorrect in the Draft SFRA and has been amended to show a lesser footprint, with only minor incursion into Flood Zones A and B. The Justification Test will be updated to add “Flood mitigation measures were incorporated in the site specific flood risk assessment of the current development proposals and include provision of surface water management (SUDS) systems and appropriately setting finished floor levels. A similar form of mitigation should be applied to future development here, in the event the current development proposals are not granted”.</p>
GLWC-C2-42 OPW	<p>OPW- Sandy Road Regeneration Site</p> <p>- The commentary on this area in section 7.9 of the SFRA states that “To satisfy Part 3 of the Justification Test a more comprehensive assessment of risks will be Required” and “Until this study is complete, development</p>	<p>CE Response</p> <p>This is noted. Sandy Road is a strategic Regeneration site as outlined in Chapter 10 section 10.8 in order to ensure full compliance with the Planning System and <i>Flood Risk</i></p>

	<p>within Flood Zone A and B should be limited to Minor Development (Section 5.28 of the Planning Guidelines)".</p> <p>- If this area has not passed the Plan Making Justification Test, these restrictions should be incorporated into the discussion in the Written Statement, where the commentary on flood risk states that the only restriction on development in the flood risk areas of the regeneration site is the requirement for an SSFRA which will be required to have regard to the Coirib go Cóstá Galway City Flood Relief Scheme project</p>	<p><i>Management - Guidelines for Planning Authorities (2009)</i> it is considered appropriate to amend the text of this section to include that until a comprehensive assessment of flood risk is undertaken, that development within Flood Zone A and B should be limited to minor development.</p> <p>CE Recommendation</p> <p>Amend the draft plan Chapter 10 Section 10.8 Sandy Road Regeneration Site to include text in green as follows:</p> <p><i>The site is well serviced by all utilities and is within easy access of a wide range of services, located close to core bus routes and a well-integrated pedestrian and road network. Part of the site is identified as at risk of flooding associated with the Terryland/Sandy River and will require a specific flood risk assessment which will be required to have regard to the Coirib go Cóstá Galway City Flood Relief Scheme project. Until this assessment is complete, development within Flood zone A and B shall be limited to minor development. In this particular case, having regard to the locational assets, national policy context, and the regeneration status of the site, the majority of the site can be dedicated to a residentially led development.</i></p>
GLWC-C2-150 Angela Casey	<p>Section 7.3 Map</p> <p>The SFRA carried out for the plan requires clarification of the Map at section 7.3. This map appears to show only the street at Munster Avenue flooding: this is incorrect and Fr Burke Park has flooded previously.</p>	<p>CE Response</p> <p>The CFRAM Study Flood Zones were used as the basis of the Flood Zone mapping in this area. They were produced through a process of detailed mapping and public consultation, but it is recognized that the maps have limitations, particularly in urban areas where flow paths may be significantly impacted by buildings, walls, kerbs and other features. The maps also only represent fluvial and tidal flooding, and the SFRA notes the importance of considering all sources of flooding, including surface water, which may have contributed to the flooding noted in the submission. This has been acknowledged in the SFRA</p>

	<p>•At section 7.3 of the SFRA report, in the record of Historical Flooding, I am asking that this be expanded to include Munster Avenue and Fr Burke Park. I can provide specific records of flooding if you wish to contact me.</p>	<p>and the requirement for site specific FRA in this area has been strengthened, even for development in Flood Zone C. Additional text is proposed in the SFRA to address this.</p> <p>CE Recommendation</p> <p>Amend the SFRA to insert the following text in green in Section 7.3 City Centre:</p> <p style="color: green;">Surface water – The occurrence of both fluvial and pluvial flood events also needs to be assessed and mitigated, as the combination could lead to a greater flood extent than indicated on the mapping.</p> <p style="color: green;">Development considerations – The FRA should also account for the alteration of flow paths around buildings and through other street features, which may direct flood flows in ways not wholly indicated on the broadscale SFRA Flood Zone mapping.</p> <p>CE Recommendation</p> <p>It is recommended that Munster Avenue and Fr Burke Park be added to the list of historical flood areas in the SFRA.</p> <p>Amend text in the SFRA Section 7.3 to include text in green as follows:</p> <p style="color: green;">Historic flooding has occurred on New Dock Street, Merchants Road, Flood Street, Lower Quay Street, Dominick Street Upper and Lower, Munster Avenue, Fr Burke Park, Spanish Parade and Ravens Terrace, amongst other locations.</p>
GLWC-C2-179 Department of the Environment, Climate and Communications	Groundwater flooding maps (historic & predictive) are available through our web viewers. The historic flood maps provide information of historic flooding, both surface water and groundwater. The predictive groundwater flood map provides information on the probability of future karst groundwater flooding (where available).	<p>CE Response</p> <p>Reference added to Section 4.2.6 of SFRA and groundwater map added.</p>

GLWC-C2-179 Land Development Agency	The LDA is committed to providing more detailed flood risk assessments on sites where it is active to support the development of these sites, in line with the Draft SFRA.	CE Response This is noted.
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Environmental Assessments: CE Recommendations:

1. Amend the Draft Development Plan Chapter 9, Policy 9.1 Flood Risk to insert text in green as follows:

Ensure the recommendations of the Strategic Flood Risk Assessment (SFRA) for the Galway City Development Plan 2023-2029 are taken into consideration in the assessment of developments in identified areas of flood risk. And Require site specific Flood Risk Assessment (FRA) and associated design and construction measures appropriate to the scale and nature of the development and the risks arising, in all areas of identified flood risk where appropriate including on sites where a only small proportion of the site is at risk of flooding and adopt a sequential approach in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009).

2. Amend the Draft Development Plan Chapter 11, Section 11.2.1 to insert text in green as follows:

CF lands south of the railway line at Renmore occupied by the Defence Forces comprising approximately 9 hectares. The Council will consider the development of these lands for institutional, amenity or community facilities use either by the Defence Forces or another institution and will not permit residential, commercial or industrial development. Any development shall not impact on lands which have been identified as at flood risk and a site specific flood risk assessment will be required as part of any development.

3. Amend the Draft Development Plan Chapter 10 Section 10.8. Sandy Road Regeneration Site- to include text outlined in green as follows:

The site is well serviced by all utilities and is within easy access of a wide range of services, located close to core bus routes and a well-integrated pedestrian and road network. Part of the site is identified as at risk of flooding associated with the Terryland/Sandy River and will require a specific flood risk assessment which will be required to have regard to the Coirib go Cóstá Galway City Flood Relief Scheme project. Until this assessment is complete, development within Flood zone A and B shall be limited to minor development. In this particular case, having regard to the locational assets, national policy context, and the regeneration status of the site, the majority of the site can be dedicated to a residentially led development.

4. Amend the SFRA Section 5.8 Climate Change to insert the following text in green:

The impact of climate change on flood risk has been considered from both a plan making and development management perspective as part of the preparation of this SFRA. As part of the specific assessment of risks to each regeneration and opportunity sites, and other zoned areas of the city a commentary has been included in the relevant part of Section 7

5. Amend the SFRA Section 5 to include a new section 5.10.7 as follows:

Bridges, culverts and weirs

Where a planning application includes proposals to amend an existing bridge, culvert or weir, or introduce a new in-channel structure, it will be necessary for the applicant to seek OPW's approval under Section 48 (weirs) and Section 50 (bridges and culverts) of the Arterial Drainage Act 1945. It should be noted that OPW approval under Section 48 and / or 50 does not influence or determine the outcome of the Planning Application process.

6. Amend the SFRA to include text in Section 7.3 City Centre – outlined in green as follows:

Surface water – The occurrence of both fluvial and pluvial flood events also needs to be assessed and mitigated, as the combination could lead to a greater flood extent than indicated on the mapping.

Development considerations – The FRA should also account for the alteration of flow paths around buildings and through other street features, which may direct flood flows in ways not wholly indicated on the broadscale SFRA Flood Zone mapping.

7. Amend the SFRA Section 7.3 City Centre to include text in green as follows:

Historic flooding has occurred on New Dock Street, Merchants Road, Flood Street, Lower Quay Street, Dominick Street Upper and Lower, Munster Avenue, Fr Burke Park, Spanish Parade and Ravens Terrace, amongst other locations.

Appendix A: List of valid submissions received

	Submission	Name	Body / Organisation represented
1	GLWC-C2-1	Joseph Fahy	
2	GLWC-C2-2	DAA (Gary Mackin)	DAA
3	GLWC-C2-3	Sean Carroll	
4	GLWC-C2-4	Paul Rush	
5	GLWC-C2-5	Paul Rush	
6	GLWC-C2-6	Derek Spillane	Galway Market Committee
7	GLWC-C2-7	Jason Roche	
8	GLWC-C2-9	Stephen Moriarty	
9	GLWC-C2-10	Trevor Dunne	
10	GLWC-C2-11	Vincent Carragher	Rethink Consumption
11	GLWC-C2-12	Clarig Consulting Engineers Ltd (Ignatius Greaney)	Gerry Burke
12	GLWC-C2-13	Brendan Heaney	Tobin Consulting Engineers
13	GLWC-C2-14	Maria Flaherty	Galway and Roscommon Education and Training Board
14	GLWC-C2-15	David Galvin	Environmental Protection Agency
15	GLWC-C2-16	Nelius Kavanagh	
16	GLWC-C2-17	Anthony Cunniffe	Foróige
17	GLWC-C2-18	Cllr. Terry O'Flaherty	
18	GLWC-C2-19	Elaine Harvey	Merlin Woods Allotment Association
19	GLWC-C2-20	Bernadette Carroll	
20	GLWC-C2-21	David Robinson	Michael Conneely
21	GLWC-C2-22	John & Maria Rabbitte	
22	GLWC-C2-23	Chris McCormack	
23	GLWC-C2-24	Paddy Boyle	
24	GLWC-C2-25	Oliver Higgins Chartered Engineers	Matt & Mary Lohan
25	GLWC-C2-26	Martina Keane	
26	GLWC-C2-27	Grainne Faller	
27	GLWC-C2-28	Aidan Doyle	Martina Keane
28	GLWC-C2-29	Niall O'Flaherty	

	Submission	Name	Body / Organisation represented
29	GLWC-C2-30	Eugene McKeown	
30	GLWC-C2-31	FX O'Brien	
31	GLWC-C2-32	Martin Fahy	Save Roscam Peninsula
32	GLWC-C2-33	James McCarthy	
33	GLWC-C2-34	Vincent McKey	
34	GLWC-C2-35	Maja Pawlik	
35	GLWC-C2-36	Nelius Kavanagh	
36	GLWC-C2-37	Ann Marie Cusack	Galway Age Friendly Alliance
37	GLWC-C2-38	Michael McCormack	Transport Infrastructure Ireland
38	GLWC-C2-39	KPMG Future Analytics (Daniel Nestor)	Salthill Knocknacarra GAA
39	GLWC-C2-40	Jane Coyne	
40	GLWC-C2-41	Peter Brennan	
41	GLWC-C2-42	OPW Flood Planning	
42	GLWC-C2-43	MKO (Pamela Harty)	Galway Race Committee
43	GLWC-C2-44	MKO (Pamela Harty)	Phyllis Molloy
44	GLWC-C2-45	Martin Fahy	Save Roscam Peninsula
45	GLWC-C2-46	Martin Fahy	Save Roscam Peninsula
46	GLWC-C2-47	Patsy Casserly	
47	GLWC-C2-48	Laura Shanley	
48	GLWC-C2-49	John Furey	
49	GLWC-C2-50	Oliver Daniels	
50	GLWC-C2-51	Laura Shanley	Corrib Rowing and Yachting Club
51	GLWC-C2-52	Ronan McDonagh	
52	GLWC-C2-53	James Roche BE, Consulting Engineer	Jimmy Francis
53	GLWC-C2-55	VHA Architects (Aisling Leahy)	Gaughan Family
54	GLWC-C2-56	Ruth Burke	
55	GLWC-C2-57	Declan Kennedy	Fort Lorenzo Residents Association
56	GLWC-C2-58	Susan Ni Churnain	Údarás na Gaeltachta
57	GLWC-C2-59	John Brennan	

	Submission	Name	Body / Organisation represented
58	GLWC-C2-60	Robert Nanasi	Castlegar GAA
59	GLWC-C2-61	Dan Carey	
60	GLWC-C2-62	Matthew Gannon	
61	GLWC-C2-63	Peter Lally	GRETB
62	GLWC-C2-64	Fiona Timoney	Northern & Western Regional Assembly
63	GLWC-C2-65	MKO (Pamela Harty)	Clearwater Ventures Ltd
64	GLWC-C2-66	Gerard Hanniffy Consultant Civil Engineer	Laurence Fox
65	GLWC-C2-67	Margaret Casserly	
66	GLWC-C2-68	Patrick Joe & Phil Kearns	
67	GLWC-C2-69	Michael Owens	Galway County Council
68	GLWC-C2-70	Brock McClure (Kathy McNally)	Musgraves
69	GLWC-C2-71	Tommy Kearns	
70	GLWC-C2-72	Sinéad O Donoghue	Land Development Agency
71	GLWC-C2-73	Philip James	
72	GLWC-C2-74	Brian Huges	Galway Educate Together Secondary School
73	GLWC-C2-75	Gerard Hanniffy. Consultant Civil Engineer.	Conor Molloy
74	GLWC-C2-76	Yvonne Jackson	Fáilte Ireland
75	GLWC-C2-77	MKO (Pamela Harty)	Cairn PLC
76	GLWC-C2-78	Lisa Fahy	
77	GLWC-C2-79	SAUTI-Youth (Letizia Gorini Coady)	SAUTI-Youth project, Youth Work Ireland Galway
78	GLWC-C2-80	Conor Dowd	
79	GLWC-C2-81	Ivan Rajkov	Noonionbmx
80	GLWC-C2-82	Aran Murray	
81	GLWC-C2-83	Noel Porter	
82	GLWC-C2-84	Martin Fahy	Save Roscam Peninsula
83	GLWC-C2-85	Roselyn Carroll	East of the Corrib: Terryland-Castlegar-Ballinfoile Community Stakeholders
84	GLWC-C2-86	Coastal Action Group	
85	GLWC-C2-87	Deirdre Grealish	

	Submission	Name	Body / Organisation represented
86	GLWC-C2-88	Maria Long	
87	GLWC-C2-89	MKO (David McGrane)	K King Construction
88	GLWC-C2-90	Anne Burn	
89	GLWC-C2-91	Galway Cycling Solutions	Galway Cycling Solutions
90	GLWC-C2-92	MKO (Evelina Sadauskaite)	Glenveagh Living
91	GLWC-C2-93	MKO (Evelina Sadauskaite)	Michael McGreal
92	GLWC-C2-94	Mairin	
93	GLWC-C2-95	MKO (Evelina Sadauskaite)	Trigo Property Co. Ltd & Welcorrib Ltd.
94	GLWC-C2-96	Department of Agriculture, Food and the Marine - Environmental Co-ordination Unit Climate Change & Bioenergy Policy Division	
95	GLWC-C2-97	Frank Monahan	Architecture at the Edge
96	GLWC-C2-98	Pete Kelly	The Village Salthill
97	GLWC-C2-99	Francis O'Brien	
98	GLWC-C2-100	John Grealish	
99	GLWC-C2-101	Gerard Hanniffy Consultant Civil Engineer.	Michael Kelly
100	GLWC-C2-102	Sheila Convery	Irish Water
101	GLWC-C2-103	MKO (Evelina Sadauskaite)	McHugh Property Holdings
102	GLWC-C2-104	Dave Mathieson	
103	GLWC-C2-105	Planning Consultancy Services (James O Donnell)	Billy Lawless
104	GLWC-C2-106	Michelle Carey	
105	GLWC-C2-107	Planning Consultancy Services (James O Donnell)	B. Fitzgerald
106	GLWC-C2-108	MKO (Martin Molloy)	Damian Hanley
107	GLWC-C2-109	MKO (Orla McCafferty)	City Gateway Ltd
108	GLWC-C2-110	MKO (Alan Clancy)	Michael Tully
109	GLWC-C2-111	Planning Consultancy Services (James O Donnell)	Mary Loughman
110	GLWC-C2-112	MKO (Alan Clancy)	Michael Tully
111	GLWC-C2-113	Planning Consultancy Services (James O Donnell)	PJ Canny
112	GLWC-C2-114	MKO (Martin Molloy)	Labhaoise Hutchinson

	Submission	Name	Body / Organisation represented
113	GLWC-C2-115	Planning Consultancy Services (James O' Donnell)	Shane O' Connor
114	GLWC-C2-116	Planning Consultancy Services (James O' Donnell)	Tommy O' Brien
115	GLWC-C2-117	MKO (Orla McCafferty)	Kulling Properties Ltd
116	GLWC-C2-118	George Gill	Ibec
117	GLWC-C2-119	Colm Cummins	Electricity Supply Board
118	GLWC-C2-120	MKO (Orla McCafferty)	Ross Tobin
119	GLWC-C2-121	MKO (Alan Clancy)	Galway Harbour Company
120	GLWC-C2-122	MKO (Pamela Harty)	Sean Noone
121	GLWC-C2-123	Owen Hanley	
122	GLWC-C2-124	Elaine Boyle	Titans Basketball Club
123	GLWC-C2-125	Valerie Ledwith	
124	GLWC-C2-126	Gerard Hanniffy Consultant Civil Engineer	Michael Kelly
125	GLWC-C2-127	Roselyn Carroll	
126	GLWC-C2-128	Ciarán Lynch	
127	GLWC-C2-129	Caoimhín Ó Cadhla	Conradh na Gaeilge
128	GLWC-C2-130	Rosshill/Roscam Residents Association	Rosshill/Roscam Residents Association
129	GLWC-C2-131	MKO (Orla McCafferty)	Teal Investments Ltd
130	GLWC-C2-132	MKO (Pamela Harty)	NUI Galway
131	GLWC-C2-133	MKO (Evelina Sadauskaite)	Liam Dilleen
132	GLWC-C2-134	Planning Consultancy Services (James O' Donnell)	Patrick Ryan
133	GLWC-C2-135	Rosshill/Roscam Residents Association	Rosshill/Roscam Residents Association
134	GLWC-C2-136	Conor Coyne	
135	GLWC-C2-137	MKO (Áine Bourke)	GPT Plant and Tool Hire
136	GLWC-C2-138	Conor Coyne	
137	GLWC-C2-139	Eamonn Hogan	
138	GLWC-C2-140	Ronan Duke	
139	GLWC-C2-141	Tanya Yeoman	National Transport Agency

	Submission	Name	Body / Organisation represented
140	GLWC-C2-142	MKO (Evelina Sadauskaite)	Green Way Estates (Leitrim) Limited
141	GLWC-C2-143	MKO (Alan Clancy)	Martin Concannon
142	GLWC-C2-144	Caroline Cawley	Innovation Technology AtlanTec Gateway (itag)
143	GLWC-C2-145	Kenneth Deery	Galway Chamber
144	GLWC-C2-146	James Dunne	Iarnród Éireann / Irish Rail
145	GLWC-C2-147	Rebecca Jackson	Galway City Community Network
146	GLWC-C2-148	Jacinta Fay	Galway City Community Network
147	GLWC-C2-149	Planning Workshop	McGrath King
148	GLWC-C2-150	Angela Casey	
149	GLWC-C2-151	Nikunj Sakhrelia	
150	GLWC-C2-152	Gabriel McGoldrick	
151	GLWC-C2-153	People Before Profit	People Before Profit Galway
152	GLWC-C2-154	Joao Ornelas	HKR Architects
153	GLWC-C2-155	The Planning Partnership (Fintan Morrin)	Creaven Co-Ownership
154	GLWC-C2-156	The Planning Partnership (Fintan Morrin)	Lidl Ireland GMBH
155	GLWC-C2-157	Bríd Ní Chonghóile	Gaillimh le Gaeilge
156	GLWC-C2-158	Thomas Lee	
157	GLWC-C2-159	Denise Hincks O'Brien	
158	GLWC-C2-160	Fintan Maher	Galway Simon Community
159	GLWC-C2-161	MKO (Meabhann Crowe)	Alber Developments
160	GLWC-C2-162	MKO (Áine Bourke)	HSE
161	GLWC-C2-163	MKO (David McGrane)	Thos McDonogh & Sons Ltd.
162	GLWC-C2-164	MKO (David McGrane)	Envirobead Ltd and Ballindooley Developmets Ltd
163	GLWC-C2-165	Sean Woods	OPR Office of the Planning Regulator
164	GLWC-C2-166	Karl Flannery	
165	GLWC-C2-167	Martin Fahy	Save Roscam Peninsula
166	GLWC-C2-168	Brian Fitzsimons	
167	GLWC-C2-169	Mark Wilson	

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168	GLWC-C2-170	Margaret Gilmore	Nuns' Island Residents' Association
169	GLWC-C2-171	Roselyn Carroll	
170	GLWC-C2-172	Mary Carney	Department of Education
171	GLWC-C2-173	Neil O'Leary	Galway Cycling Campaign
172	GLWC-C2-174	Vusi Thabethe	Shining Light Galway
173	GLWC-C2-175	Deirdre Greally	
174	GLWC-C2-176	Kevin Jennings	
175	GLWC-C2-177	Jen Hesnan	
176	GLWC-C2-178	Avison Young (Heather McMeel)	An Post
177	GLWC-C2-179	Enda Brady	Department of the Environment, Climate and Communications
178	GLWC-C2-180	Rose Foley	Access for All
179	GLWC-C2-181	Decaln Brassil (Hennie Kallmeyer)	Eir
180	GLWC-C2-182	Jacqui Traynor	Reform, Central Policy and Communications Division - Dept. of Transport
181	GLWC-C2-183	The Planning Partnership (Fintan Morrin)	Mavenbrook Ltd
182	GLWC-C2-184	Valerie Walsh	
183	GLWC-C2-185	Anne Mooney	Proofridge Ltd,
184	GLWC-C2-186	Derek Dalton	Galway Archers
185	GLWC-C2-187	Brendan Smith	
186	GLWC-C2-188	Siobhan Fitzgerald	
187	GLWC-C2-189	Brendan Smith	Galway National Park City initiative
188	GLWC-C2-190	D Hambleton	An Taisce - Galway Planning Committee
189	GLWC-C2-191	Máire Cris Ó Ní Chionna	Bowling Green Residents' Association
190	GLWC-C2-192	Eimear Kelleher	Arts Council / An Chomhairle Ealaón
191	GLWC-C2-194	Mary McMyler	
192	GLWC-C2-195	Robert Keane	
193	GLWC-C2-196	David Byrne	COPE Galway
194	GLWC-C2-197	Ronan Crowe	

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195	GLWC-C2-198	MKO (Colm Ryan)	Walter King
196	GLWC-C2-199	Shauna Spillane	
197	GLWC-C2-201	Evelyn Fanning	Galway City Alcohol Forum
198	GLWC-C2-202	Evelyn Fanning	Galway City Early Years sub- committee of CYPSC
199	GLWC-C2-203	Paulene Kennelly	
200	GLWC-C2-204	Jane Shimizu	
201	GLWC-C2-205	Bernadette Carroll	
202	GLWC-C2-206	Maura Long	
203	GLWC-C2-207	Ann King	
204	GLWC-C2-208	David Howard	
205	GLWC-C2-209	Lenny Antonelli	
206	GLWC-C2-210	Mairin Ui Chomain	
207	GLWC-C2-211	Yvonne Murphy	SSE plc
208	GLWC-C2-212	Eibhlín Seoighe	Galway Commuter Coalition
209	GLWC-C2-213	Brendan Holland	Gluas Very Light Rail Committee
210	GLWC-C2-214	Nuala Cosgrove	
211	GLWC-C2-215	Sheenagh MacLaverty	
212	GLWC-C2-216	Pauline Quigley	
213	GLWC-C2-217	Mary Walsh	
214	GLWC-C2-218	Claire Finn	
215	GLWC-C2-219	Ibai Gantxegi-Siles	
216	GLWC-C2-220	Deirdre Greally	
217	GLWC-C2-221	Orla Concannon	
218	GLWC-C2-222	Anita Furey	
219	GLWC-C2-223	Elaine Jeff	
220	GLWC-C2-225	Sinead Bradbury	
221	GLWC-C2-226	Émeline Cacciaguidi-Fahy	
222	GLWC-C2-227	Brendan Mulligan	
223	GLWC-C2-228	Brendan Mulligan	Galway Environmental Network
224	GLWC-C2-229	Caroline Stanley	Friends of Merlin Woods

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225	GLWC-C2-230	Diarmuid Buttiner	Dept. Housing, Local Government and Heritage
226	GLWC-C2-231	Pat O Hanlon	Lakewood Park Residents Association
227	GLWC-C2-232	Ray Diamond	Munster Avenue Residents Association
228	GLWC-C2-233	Cyril J Kelly & Associates	Tommy Grogan
229	GLWC-C2-234	Anne & Pat O'Toole	
230	GLWC-C2-235	Bernadette & James Cormican	