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Subject: 2022-2028 County Development Plan submission.
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Introduction:

As a former chair of An Taisce - Galway Association (Branch) and now in my own name I wish to contribute my own thoughts to the issues which I feel are of importance that should be a focus for debate. With all outcomes of a positive nature made ready for consideration and inclusion in the coming 2022-2028 County Development Plan.

Issues listed herein are in no particular order of importance, they are all important to me. These are the subject issues that I feel need to be fully addressed in any CDP Review:

With governments these days changing more frequently than County/City Development Plans come up for review! It is worth noting that National Policy is leading us towards taking a more Regionalised approach in terms of Spatial Planning. That Ireland is becoming more structured towards allowing Regional responsibility be taken for how each area manages its environments. The formation of a North Western Regional Assembly, with its own all encompassing Regional Spatial and Economic Strategy (RSES), complete with a Metropolitan Area Strategic Plan will see expanding housing developments outwards into areas around Bearna, Claregalway and to Oranmore also Moycullen etc. Of course many other county towns and villages are seeing similar housing growth!

With all pervasive Global Climate Change and now Covid-19 to worry about. Today's decision makers will have much more to think about, as well as assuming a significant responsibility to care for all who live in our county, as well as the wider community spread throughout the West of Ireland.

Jack O'Sullivan – a Council member of An Taisce reminds us that:

“Emerging or novel viruses are not new. The SARS epidemic of 2002-3, which infected 8,098 people worldwide, killing 774 of them, was caused by a coronavirus, and so was the MERS outbreak that began on the Arabian Peninsula in 2012 and still lingers on (2,494 people infected and 858 deaths by November 2019). The rapid spread of SARS-CoV-2 — the virus which causes Covid-19 – may have been unexpected as it occurred, but it is certainly not unsurprising or unforeseeable to anyone familiar with zoonotic diseases which spill over from animals to humans [1]. The US Centre for Disease Control and Prevention (CDC) estimates that three-quarters of new or emerging

diseases that infect humans originate in animals. Some of these, for example, rabies and plague, crossed from animals to humans many centuries ago.”

(1) “How Animal Infections Spill Over to Humans”. Public Health Science Talk; David Quammen and Steve Mirsky; *Scientific American*, March 18, 2020; and “We Made the Coronavirus Epidemic”, by David Quammen, *New York Times*, 28 January 2020.

Along with isolation, social distancing, lockdown. This is an extraordinary time we are living through. Covid-19 is an unprecedented global crisis, and has brought life as we know it almost to a standstill. It’s scary, stressful, and at times utterly heart-breaking. Yet we all know that this is just a foreshadowing of what is to come if we do not address climate breakdown and biodiversity loss. With our minds currently full with coronavirus worries it can be hard to think beyond our immediate life concerns. It is at times like this that communities find themselves taking solace in the very thing that many of us are working so hard to protect: our natural world. It behoves all of our decision makers to reflect these concerns through to the final Galway County Development Plan 2022-2028!

In planning for the future development of County Galway I am also convinced that this can be best achieved, only if the County comes together with the City in moving towards an amalgamation. I say this for many reasons, but mostly because by coming together with the strength of numbers (population), can we together seek the government funding necessary to allow the region compete against the already amalgamated city/countys of Limerick, Cork and Waterford. **It must happen.**

Main Body by Topic:

Core Strategy and Housing.

In the twenty years since publication of Malcolm Buchanans LUTS plan, the imbalances that resulted as between where people were being encouraged to live, with urban style housing developments promoted further outside almost every village within the 40km radius of Galway, many some distance from where their occupants work, has led to what is now known as Rurban Sprawl, a situation where housing is built some distance away from where people actually work.

Many people now living in rural parts of county Galway were thence forced to drive towards the city each working day. This has led to what Ann Graham CEO of TII, Transport Infrastructure Ireland says is becoming “unacceptable long-commutes’ where family members are forced to travel longer distances to get to work, shops or to deliver children to schools etc.

The only sustainable long-term solution to congestion is for people to be living close enough to their place of work that either they can walk, cycle or avail of high-frequency public transport.

In large areas where housing is highly dispersed, it is simply not possible to effectively locate employment to facilitate this. Hence the only viable solution is to concentrate new housing nearer to business centres.

Continuing to allow for the construction of One-Off houses in strips along endless road frontages, as well as up boreens, is not conducive to sustainable living or is it representative of sensible planning. Only adding cost to the provision of electricity and water services as well as postal deliveries broadband and phone network services.

Dependence on septic tanks that are rarely, or not often serviced and are most

certainly leading to increased run-off, pollution of streams leading to rivers, leading themselves to Lough Corrib, or some other lake, or to the sea is unacceptable today and is making it more likely for continuing EU fines to be levied on Ireland. EPA reports clearly show evidence to this effect.

Continuation of this practice of allowing houses be built everywhere can only lead towards more towns and villages emptying out which itself promotes rural decline. People also have to travel further, using cars to obtain services once available in rural towns but now only viable in larger towns or in the city itself thus promoting more car dependence and creating pollution.. Mains pipework leading towards central waste water treatment plants is only made financially feasible when housing is grouped within and is designed to support growth of towns and villages. Only by so doing can rural life be protected. It is the allowance of continuing rural housing sprawl that is killing rural life!

There are just two out of the ten, **Key Principles**, contained in the Governments 2015 statement which are to us who live in Galway relevant, the first is:-

“Planning must support the transition to a low carbon future and adapt to a changing climate [securing less energy and travel intensive development patterns] taking full account of flood risk and facilitating, as appropriate, the use of renewable resources, particularly the development of alternative indigenous energy resources”

“Planning must ensure that development facilitates and encourages greater use of public transport as well as making walking and cycling more attractive for people in support of active and healthy lifestyles by focusing development, whenever possible, at locations with more sustainable travel options.”

Urban Living & Placemaking & Rural Placemaking & the Countryside.

Revitalising small towns and villages to make them more attractive for those who live in them can only be achieved through encouraging cooperation, and with involvement of local communities. People are as a result of Covid-19 now more likely to be found working from home but may also need to avail of local Digital Hubs, which offer strong broadband connectivity.

To promote more urban living back into declining villages needs to see more local community consultation and actual involvement is allowed in planning for better Placemaking, for community members to be encouraged into decision making roles around the provision of say, new playground/recreational facilities and in tidying up of run down areas. Development of Community Centres must allow for multi-purpose use and not only sports use. Creches, office services and cafes etc.

Empty shops and premises can, with financial incentives be brought back into use as centres for the Arts and as Cultural centres etc.

Rural areas outside of towns should see roads verges are kept tidy and drains free of blockage. Hedges must be maintained and kept tidy, especially near junctions for roads safety reasons. But also that cutting hedges is strictly enforced, so as only to take place when permitted, to protect wildlife.

Economic Enterprise, Tourism and Retail Development.

Local enterprise development needs to be upscaled to encourage more by way of local employment. This would help reduce car commuting to larger towns or into Galway, keeping people working nearer to their own homes.

While the IDA do great work in the city. There is less evidence they are promoting the

relocation of too many businesses into rural small towns or villages. Likewise with Uderas and other government agencies.

Tourism while it is important, should not be the only policy option used in rural areas. There must be an effort made to diversify by encouraging small & medium smart enterprises to set up in areas where being remote might be less of an issue.

There must be an audit made of locations along the Atlantic Economic Corridor which would identify places where more local enterprise could be developed, can be set up and supported? It might seem obvious that while areas along the Wild Atlantic Way are reaping some rewards, it should be that more of an effort is made to bring visitors into areas of east Galway that are seen as neglected in terms of tourist promotion.

The completion of Greenways could help in this. But Greenways should not be built on unused rail alignments that are still capable of being brought back into use.

Infrastructure & Transport.

When making her statement in the Dail, Ann Graham CEO of TII 'Transport Infrastructure Ireland' said *"demand for travel is growing rapidly and the public transport system must respond to that demand. While the Authority is planning for the infrastructure to meet this demand, the funding is not fully in place for its construction. An increasingly congested city has the potential to undermine the economic recovery that is taking place and stifle the provision of the housing and commercial developments that are required to sustain that growth."*

Ms Graham might have been speaking about long distance car travel within the County, as with so many families now living in rural County Galway, they too have been let down by transport planners!

This brings us to the much wider planning problem, of which there are many in Galway, both in the city but also in the County – mostly these relate to the almost total reliance people who live within the 40km radius of the city have in their need to use of a car to get to work. In a May 2014 Newsletter of the WDC, *Western Development Commission* - using an IDA case study, we were told that *"of the 16,701 rural dwellers commuting to work within the gateway of Galway city, one quarter (25.6% or 4,285) commute to work in the IDA estates."*

Parkmore, in the city and in the County is only one place that is seen as suffering. Many IDA estates face the same problems around gridlock, both on entering or leaving the city.

As James Wickham has said in his book 'GRIDLOCK' *New Island 2003*.

"Car dependency is an issue for social policy. Car dependency exacerbates social exclusion, for those who do not have a car run the risk of being excluded from normal life. Their access to jobs is restricted, they find it difficult to move around, they are not full citizens."

Acting County CEO Kevin Kelly, once told an audience present in the Meyrick Hotel ballroom, gathered to hear housing minister Simon Coveney, announce his latest 'Action Plan for Housing and Homelessness' (24th September 2016?). Kelly said *'Of all the numbers of new houses built in the county last year 50% were grants for 'one-offs'*. It should be no surprise therefore to note that without consequent development of additional public transport services to these locations, an impossible task. So many more workers living in county areas will have to continue to travel to work by car.

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With MASP now an adopted policy of both City & County Councils, there must be a joint effort made to develop an actual plan/map for where future development is to take place? Housing, Business Parks, Schools and Retail all need to be placed in areas that cause least traffic movement.

Parkmore should have been surrounded with housing that brought workers within reach of their jobs without recourse to car use. Public transport should not just drop passengers off at the entrance. Buses should enter the estate and bring passengers up to the far end of Parkmore West. It's a long walk in the rain!

Efforts to have the city develop a Light Rail Network are still progressing. A Feasibility study is being sought. With the expanded MASP area in place there is now further reason to believe it is an essential project to help reduce congestion and to raise the profile of Galway as being a modern progressive place in which to live and to do business not just to visit Galwat Races.

The need is to provide connections into the city from Oranmore, Bearna and Claregalway, make this a now essential project not just a dream. Those who say Galway is too small and lacks density are quite simply wrong. There are already many examples around Europe where smaller populations are using light rail as an alternative to building motorways, and yet more roads.

Carnmore, the former airport is an ideal location on which to place a LRT depot, while also offering space for Park n Ride options for those coming in off the motorway and to travel on a line on in through either Parkmore, to town via Ballybane/Ballybrit, Tuam Road. Or via Ardaun, Doughuisce, Renmore. Preferably two routes through the city on out to Barna via the Western Distributor Road, serving Knocknacarra to a Bearna terminus similarly equipped for Park n Ride.

Twin tracking the line from Ceannt Station out towards Athenry, later to Ballinasloe must be undertaken with electrification of the line, allowing a modern commuter train service into and out of Galway.

Government must be held to account in its promised reallocation of funding out of Dublin into servicing the regions. Galway must jointly make its case for serious public transport allocations.

Not just more spending on roads, but by providing real public transport services for its growing population!

Phase 2 of the Western Rail Corridor which is to support the onward redevelopment of rail transport as far as Sligo eventually, improved and more frequent train services which are also connected to bus services, must be brought forward. The long awaited publication of the Ernst & Young Report hidden somewhere in a drawer must now be seen so that policies can be advanced!

[Environment, Renewable Energies and Communications.](#)

Ireland is failing to limit escalating levels of dangerous ammonia air pollution due to continuing dairy intensification and excessive use of nitrogen from fertiliser and feeds. Due to government inaction on this issue, An Taisce has lodged a legal infringement complaint to the European Commission on the continued and increasing breach of the National Emissions Ceiling Directive (2016/2284/EU) on ammonia air pollution.

Galway must also be seen to do what it can to help reduce dangerous pollution into the atmosphere promoting Global Climate Change, which as we are becoming increasingly aware, is causing damage from extreme weather events.

In a report released in June, the European Commission has assessed Ireland as being at high risk of non-compliance with agreed air pollution reduction commitments before and after 2030. Ireland's policies and measures to address ammonia pollution are deemed inadequate to meet the required limits.

An Taisce has also warned that immediate and effective action is needed to reduce ammonia emissions as other nations are now doing with due urgency.

As the paper released to advise us on what the issues are tells us, "*The Government's Climate Action Plan 2019 (CAP) recognises that the impact of greenhouse gas emissions has accelerated in recent years. Ireland is supporting the ambition that is emerging within the European Union to achieve a net zero target by 2050. County Galway must play its part in delivering on the climate change actions as per the CAP. This can be achieved by examining how best to provide for sustainable living across the County. This may be achieved by supporting large populations with sustainable transport services which would reduce the level of carbon emissions through reduction of private car usage.*" The County Plan must set out a plan on how it proposes to deal with rising levels of pollution contributing to climate change.

The development of alternative environmentally sustainable energies in Galway is painfully slow. With the exception of Wind Farm development and increasing numbers of Solar projects which must be carefully placed not to interfere with residents amenity, but also to avoid sensitive tourist amenity environments. It is still worrying that eyes are being directed towards wind farm projects being placed inside the Conamara National Park which should be resisted always!

The Marine Institutes promotion of ocean energy is equally falling behind what is happening elsewhere in Europe. Offshore wind turbines off the coast of Conamara (Skerd Rocks) seem to have been delayed, or dropped?

The development of energy hungry Data Centres will always be controversial, despite claims to the contrary. Their economic and claimed employment benefit is contested.

Broadband development into the rural hinterland is seemingly slow, while the creation of Digital Hubs in central village/town areas is a creative way of providing services in distant locations. Locations where this might happen quickly should be identified in the plan.

[Architectural and Archaeological Heritage.](#)

County Galway is just filled with Architectural and Archaeological Heritage, and GCC has a very capable team of staff based in County Buildings to look after it. It might be suggested that a full audit of structures and their current condition be carried out, so that priority is given to those most in danger of being lost.

However, there are just so many historic buildings in the county that also require highlighting, that might benefit and be capable of conservation with funding and plans created for them to allow this happen, over time? Tyrone House, Kilcolgan, Castlemagarrett, Tuam and Woodlawn are only the obvious examples where restoration

is not deemed impossible. Woodlawn House is being actively conserved and cared for by a local society and its owners while so many other 'Great Houses' are fading to oblivion with no obvious schemes in place to retain them! The Heritage Council should be invited to survey and to list those which with funding could be best preserved.

There are many local groups of Heritage volunteers and Family History Societies that could be supported to do research and contribute their time in the planned conservation or care of local heritage.

Never enough attention is paid to aspects of our collective Heritage, which is not always just buildings but includes much else besides.

[Social, Community and Cultural Development.](#)

Each town and village should have itself mapped and all features recorded. Maps would not just show topographical features. But would set out where all community services are located as well as detailing places where new Cultural facilities might be placed as funding becomes available.

[The Galway Gaeltacht and the Islands.](#)

Interest in the Irish Language seems to fluctuate here over time, which interest today seems is on an upswing. Nevertheless a nation with a unique language is a sign of a people with a healthy respect for its nationhood, its daily use should be encouraged. Gaelic language probably suffered through being a compulsory subject in schools. I have no Irish and got no encouragement to try and learn any. Though a Scot by birth I never learned Scots Gaelic either, as I was brought up in the south of England before coming to Galway 40 years ago.

I tagged the Islands onto the end of this section as though not an Irish speaker I am a regular visitor to Aran, where Irish is strongest, but might be fading due to so many new residents coming to live there.

One of my serious concerns is about the level of tourist numbers who can now easily visit the islands! While just 40 years ago there might be just one ferry a week in winter. There is now perhaps just too many for the good of island culture, which still exists, but could be quickly lost if not minded?

Also, as a tourist hotspot the islands are suffering from the lack of some basic infrastructure which we take for granted on the mainland. It has been pointed out to me that dangerous faecal pollution is destroying some of the islands most delicate environments. Especially in Kilronan where discharge of raw untreated sewage via inadequate treatment systems, is running into beach SAC's & NHA's. Fields are being destroyed with toxic pollution from sewage runoff. That there is no WWTP in Kilronan or anywhere on the islands to cater for the now many thousands of visitors staying on, or visiting for a single day. There are no public toilets or washing facilities either. A disgrace!

Yet planning permissions for some local business owners seems not to be a problem?

Also, when are the regular summer water shortages experienced on Aran going to be resolved? Climate Change is going to have significant affects for island communities. Yet there is only one page in the current Plan dealing with island issues. Much more needs to be done to make visiting the islands a better less stressful experience and also for all inhabitants on Aran, which is of course the 3 islands of Inishmaan, Inishmor & Inisheer though the smaller ones are less affected. Reading historian Diarmaid Ferriters recent book "On the Edge," one is led to the conclusion that things are not much better today than they were back 50 years ago, in respect of continued political failure over island development? A once proposed golf course should never be allowed!

On the other side of island affairs, the local community company seems to be doing great work by insulating islanders houses, and by providing energy conservation systems which are being installed.

The late Tim Robinson RIP would be distraught to hear that further Wind Turbines are again being considered for installation on Aran. The character of the islands is being destroyed by stages. It is possible that the islands unique limestone pavements are also under threat from changing farming practices, as the number of active farmers reduces! Aran Life - Report.

Natural Heritage, Landscape and Green Infrastructure.

The development of Greenways throughout the County is again being actively considered, with consultation events being organized. Many of the possibilities for routes are said to follow decommissioned rail routes, particularly on the bed of the Clifden-Galway line are now closed because of housing development allowed be built over past decades. Nevertheless, there are still opportunities for the selection of scenic routes, which avoid close contact or by running alongside busy main roads, which is undesirable.

The still active possibilities for restructuring and reuse of the Athenry to Tuam line for West On Tracks project does not prevent a Greenway alongside the track bed. But under no circumstances should any Greenway stray onto the mainline?

The phasing out of commercial turf cutting should be preceded by the development of plans to repurpose a the bogs for natural environment projects that also allow jobs be created for former turf cutters!

Agriculture, Fishing Marine and Forestry.

Ammonia (NH₃) is a highly reactive nitrogen pollutant with harmful effects on delicate ecosystems and on human health through the creation of particle and ozone air pollution. Agriculture is responsible for over 99% of ammonia emissions, primarily due to cattle urine and slurry. Currently there are over 1.5 million dairy cows in Ireland, an increase of 450,000 since 2011, and over 5.8 million other cattle. Rather than the claimed efficiency gains, the key driver for production and the coupled pollution increases is a 38% rise in nitrogen fertiliser.

Wholly contrary to Ireland's climate, biodiversity and air and water pollution commitments, further increases in dairy cow numbers are planned. Agri-industry organisations and Teagasc, the agriculture advisory body, have failed to make it clear to the public, the media and farmers, that *any* rise in dairy numbers pursued by policy *must* logically be balanced by reductions in beef cattle numbers to stay within overall ammonia emissions limits.

With agricultural and forestry activities leading to leakage of slurry into streams, rivers and lakes there is always the chance of a recurrence of Cryptosporidium or other diseases into our drinking water. It is imperative that other, more sustainable forms of agriculture be looked at more closely.

Creation of forestry is welcomed as long as it is properly managed and of native species.

Conclusions.

In concluding my comments on the issues which I feel need to be discussed during the preparation for the next County Development Plan 2022-2028, it would be well to consider that after a 'lost decade' on failing to deal with necessary climate action, Ireland finally has a government in place with an ambitious mandate from the electorate calling for transformative change into the 2020s.

The new Program for Government includes the unprecedented commitment to an average 7% reduction in overall greenhouse gas emissions from 2021-2030, based on a pathway to achieving net-zero emissions no later than 2050.

In the Climate Action Bill, said to be in the Dáil within 100 days, the new 2030 and 2050 climate targets will need to be carefully defined in terms of Paris Agreement-aligned cumulative budgets for carbon dioxide and nitrous oxide, as well as sustained and substantial methane emissions reduction.

After years of abject failure, succeeding on delivering this objective equitably would finally transform Ireland from our status of international laggards in terms of playing our fair share in crucial global efforts to address dangerous climate change and biodiversity collapse.

Achieving these objectives will require wide-ranging changes across all aspects of Irish society and our economy, as well as shifts in mindset in how we define what are our core values and true priorities. No less will be the need for County and City Councils all across Ireland to live up to its responsibilities when preparing their Development Plans.

I wish Galway County Council well in this process.

All recommendations, highlights and concerns presented are of my own opinion and are made without prejudice.

Please acknowledge receipt of this submission.

Sincerely,

Derrick Hambleton.

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