

## **Galway County Development Plan 2022-2028.**

### **Pre-Draft Public Consultation Submission.**

#### **Submitted by Grúpa Pobail Chéibh An tSrutháin, An Cheathrú Rua.**

Grúpa Pobail Chéibh an tSrutháin , An Cheathrú Rua propose that the new Galway County Development Plan 2022-2028 would include strict regulations prohibiting the development of Waste Water Treatment Plants (WWTP) on scenic sites adjacent to the seashore or in close proximity to public Piers or other such public amenities or facilities.

We have found ourselves involved in a protracted dispute for over 12 years as regards what our community believe is a totally inappropriate proposal to locate a WWTP on a scenic site at Céibh an tSrutháin. As an alternative we've advocated the designation and zoning of Céibh an tSrutháin Pier as a public "Recreation and Amenity Area" which could be developed in the interests of the community and of the fishing and traditional sailing boating and yachting interests who use the Pier.

We believe as a first point of departure that strict regulations need to be implemented as regards WWTPs on coastal and scenic sites and that such regulations need to be an integral part of the County Development Plan in order to ensure the proper protection of our beautiful coastal region and to ensure sustainable environmental protection. We also believe that this matter is all the more urgent in view of the growing concerns as regards climate change and it's affects on exposed coastal regions.

If such regulations were adopted we would be hopeful that sites like ours at Céibh an tSrutháin would not be eligible to be considered as appropriate sites for sewage plants. Consequently we would be hopeful that Ceibh an tSrutháin would be ruled out as a site for the plans currently being put forward.

A very welcome proposal was initiated by the elected members of Galway County Council in February 2019 calling for the adoption of regulations that would ensure that a 100m Cordon Sanitaire was placed around future WWTPs in the Conamara area. We feel that such a 100m regulation is very much in the interests of proper sustainable development. If incorporated in the County Development Plan this 100m rule would in all probability halt the proposal for Céibh an tSrutháin but we need to go further especially at scenic non-industrial coastal sites along our shoreline.

*A separate submission as regards the 100m rule is enclosed. (Appendix A).*

Further measures are required in order to copper fasten the protection of sites like Céibh an tSrutháin. We would be of the view that further stringent regulations are in order to ensure the protection of our county's coastal environment because a 100m buffer rule may not of itself be enough.

As the issue of "Climate Change" becomes ever more pressing it beggars belief that there are still plans being advanced for the development of a Waste Water Treatment Plant at a windswept location such as Céibh an tSrutháin.

Furthermore in light of the continuing Public Health Emergency necessitated by the Coronavirus outbreak and the heightened awareness of the importance of Public Health considerations there is also now a need to re-assess the public health implications associated with the development of Sewage Treatment Plants in close proximity to sensitive receptors. It is clear that this aspect of forward planning is becoming crucially important. There needs to be a complete re-assessment of locating these plants anywhere close to dwellings or in areas which are in daily use as public amenities.

In most if not all instances in an area like Conamara there are realistic alternatives available as regards the provision of sewage treatment facilities. They can be located discreetly in secluded sites away from public view or public access and in many instances new forms of technology such as wetlands can be embraced and developed. There is no longer a need to repeat the mistakes of the past where WWTPs were located on the coastline necessitating direct discharges into waterways or seashore outlets.

We ask the Council to urgently address the issues we've highlighted in this brief submission and therefore call for the adoption of further stringent appropriate regulations for the prohibition of the development of Waste Water Treatment Plants at non-industrial scenic coastal sites.

Our site at Céibh an tSrutháin is a prime example of the kind of sensitive site that needs to be carefully assessed and managed as regards issues of the Environment, Climate Change and of Public Health. This site should never have been earmarked as an appropriate site for a Waste Water Treatment Plant. Instead it should be designated as a "Recreation and Amenity Area" and protected as such in the Galway County Development Plan. We now call on our planners and elected representatives to ensure that our concerns are addressed and incorporated into the County's plans for the future. We ask that this be implemented in the Galway County Development Plan 2022-2028.

*A separate Submission is made as regards zoning.(Appendix B).*

## **Appendix A. 100m cordon sanitaire.**

### **Galway County Development Plan 2022-2028. Pre-Draft Public Consultation Submission.**

**Submitted by Grúpa Pobail Chéibh An tSrutháin, An Cheathrú Rua.**

Grúpa Pobail Chéibh an tSrutháin, An Cheathrú Rua propose the urgent incorporation into the Galway County Development Plan 2022-2028 of the following motion adopted by elected members at the plenary meeting of Galway County Council on 25 February 2019.

***“That all new Public (Municipal) Wastewater Treatment Facilities (WWTFs) in Conamara to be constructed from here on forward by Irish Water, their agents or otherwise ,shall have a minimum cordon sanitaire (buffer zone), of 100m surrounding the WWTP plant site Boundary for the purpose of protecting sensitive receptors”***

*Source: Minutes of Council Meeting of Galway County Council : 25 February 2019.*

<http://www.galway.ie/en/services/yourcouncil/meetings/councilmeetings/minutes2019/>

This motion was overwhelmingly passed in a vote in plenary session by the elected members of Galway County Council:

**Yes: 21    No: 3    Abstain: 7    No-Voting: 0**

It is incumbent on the Council to now give proper statutory effect to this resolution.

The issue is an issue of equality as much as anything else to ensure that all areas of the County are treated equally and that all the rules and regulations are uniform. It has come to light that in most Town Plans in County Galway a 100m buffer zone is protected around WWTPs but in the case of Céibh an tSrutháin and other areas in Conamara only 50m is called for. Such a situation is unjust and contrary to the common good.

In the interest of the democratic imperative the 100m proposal adopted so overwhelmingly by the elected members should now be incorporated into the County Development Plan. No less a course of action is acceptable in order to give effect to the desired expressed wish of the elected Councillors acting as the voice of the people.

## **Appendix B. “Recreation and Amenity Area” Zoning.**

### **Galway County Development Plan 2022-2028.**

#### **Pre-Draft Public Consultation Submission.**

**Submitted by Grúpa Pobail Chéibh An tSrutháin, An Cheathrú Rua.**

Grúpa Pobail Chéibh an tSrutháin, An Cheathrú Rua request that Céibh an tSrutháin be recognised and zoned in the Galway County Development Plan 2022-2018 as a “Recreation and Amenity Area”.

Céibh an tSrutháin is a special unique place and no ordinary run of the mill site. Such sites are rare in the whole country.

It is an historic site in a High Scenic Amenity Area and it’s a much valued asset for the community as a whole. This locality is first and foremost a residential, seaside scenic fishing sailing and tourist area including accommodation and B&B facilities aimed at tourists and Irish Language students.

The Céibh an tSrutháin Pier area is a focus for activities engaged in by fishermen, sailors, strollers and sightseers and many leisure time and water based activities pursued by local people and tourists alike..

The site is an historic focal point steeped in the area’s maritime culture and heritage. It’s historic significance and heritage is of enormous importance. Of particular note is the site’s association with the Galway Hooker sailing boats and traditions in Galway Bay and the Aran Islands. In former times this pier was a gateway and community trading hub and home to a fleet of Galway Hookers plying their trade between here and the Aran Islands and places like Kenvara and further afield across the vast expanse of famous Galway Bay.

Nowadays former glory days of old are still recalled in folklore, in song and in story and in activities like Féile an tSrutháin and the annual turf boat race across Galway Bay from Sruthán to Kinvara.

It is now time for official recognition in the Galway County Development Plan of longstanding aims and desires to designate and confirm Céibh an tSrutháin as a public amenity to be developed for leisure time and tourist activities for the enjoyment of the community.

We therefore request that the Céibh an tSrutháin area be recognised and zoned in the County Development Plan 2022-2018 as a “Recreation and Amenity Area”.

## **Plean Forbartha Chontae na Gaillimhe 2022-2028.**

### **Aighneacht maidir le Réamh-Dhréacht den Chomhairliúchán Poiblí. Seolta ag Grúpa Pobail Chéibh an tSrutháin, An Cheathrú Rua.**

Molann Grúpa Pobail Chéibh an tSrutháin, An Cheathrú Rua go mbeadh dianrialacháin san áireamh i bPlean Forbartha nua Chontae na Gaillimhe 2022-2028 a chuireann cosc ar Ionaid Chóireála Fuíolluisce (WWTP) a fhorbairt ar shuíomhanna áille cois cladaigh nó i ngar do chéanna Poiblí nó áiseanna nó saoráidí poiblí eile den aon sórt.

Tá muidne sáite le breis agus dhá bhliain déag anuas i bhfeachtas fada ag éileamh athrú intinne maidir leis an moladh go lonnófaí ionad cóireála fuíolluisce ar shuíomh fíor álainn ag Céibh an tSrutháin. Creideann ár bpobal gur togra iomlán míchuí atá sa togra seo. Mar mhalairt air sin tá sé molta againn Céibh an tSrutháin agus an limistéar a ainmniú mar “Crios Áineasa agus Caithimh Aimsire” a d’fhéadfaí a fhorbairt ar mhaithe leis an bpobal agus ar mhaithe lena leasanna iascaireachta, bádóireachta, seoltóireachta agus luamhaireachta a úsáideann an Ché.

Creidimid ar an gcéad dul síos go gcaithfear dianrialacháin maidir le hIonaid Chóireála Fuíolluisce ar an gcósta agus in áiteanna áille a bheith curtha i bhfeidhm agus a bheith ina gcuid dhílis den Phlean Forbartha Contae chun cosaint cheart a thabhairt dár réigiún álainn cósta agus chun cosaint inbhuanaithe comhshaoil a chinntiú. Tá práinn ar leith ag baint lena cúrsaí seo anois i bhfianaise an mhór imní atá tagtha chun cinn faoi athrú aeráide agus a thionchar sin ar láthaireacha cois cósta.

Dá nglacfaí le rialacháin den sórt sin bheadh muid dóchasach nach mbeadh suíomhanna mar Chéibh an tSrutháin incháilithe mar shuíomh feiliúnach d’Ionaid Chóireála Fuíolluisce agus go gcuirfí Céibh an tSrutháin as an áireamh ar fad mar shuíomh do na pleananna atá á mbeartú faoi láthair.

Chuir baill tofa Chomhairle Contae na Gaillimhe rún chun cinn i mí Feabhra 2019, rún a bhfuil an-fháilte againn roimhe, ag éileamh go nglacfaí le rialacháin a chinnteodh go gcuirfí “Cordon Sanitaire” 100m timpeall ar Ionaid Chóireála Fuíolluisce i gceantar Chonamara. Measann muid go bhfuil rialachán 100m den sórt sin ar mhaithe le forbairt cheart inbhuanaithe. Dá gcuirfí an riail seo sa Phlean Forbartha Contae is maith an seans go gcuirfí deireadh leis an togra atá molta do Chéibh an tSrutháin ach caithfidh muid dul níos faide ná sin go háirithe i gcás láithreáin áille cois cósta nach bhfuil forbartha cheanna féin.

***Tá aighneacht ar leith ceangailte maidir leis an riail 100m. (Aguisín A)***

Tá gá le bearta eile chun suímh mar Céibh an tSrutháin a chosaint. Tá muid den tuairim go dteastaíonn tuilleadh dianrialachán chun cosaint a thabhairt dár dtimpeallacht chósta sa chontae seo mar go mb'fhéidir nach leor riail mhaolánach 100m ann féin.

De réir mar a bhíonn ceist an “Athraithe Aeráide” ag éirí níos práinní, tá sé dochreidte go bhfuil pleananna fós á gcur chun cinn chun Ionad Cóireála Fuíolluisce a fhorbairt ar shuíomh chomh rite le Céibh an tSrutháin.

Anuas air sin, i bhfianaise na hÉigeandála leanúnaí sa tSláinte Phoiblí de bharr an ráig den Choróinvíreas agus an fheasacht mhéadaithe ar thábhacht chúinsí Sláinte Poiblí, is gá anois athmheasúnú a dhéanamh ar na himpleachtaí sláinte poiblí a bhaineann le hIonad Cóireála Séarachais a fhorbairt chomh gar do ghabhdóirí íogaire (*sensitive receptors*). Is léir go bhfuil an ghné seo den réamhphleanáil ag éirí ríthábhachtach. Ní mór athmheasúnú iomlán a dhéanamh ar na hionaid seo a lonnú áit ar bith gar do thithe nó i gceantair a úsáidtear go laethúil mar shaoráidí poiblí.

I bhformhór na gcásanna agus b'fhéidir fiú i ngach cás i gceantar cosúil le Conamara, tá roghanna réalaíocha ar fáil maidir le háiseanna cóireála séarachais a sholáthar. Is féidir iad a lonnú go discréideach i suímh cúlraídeacha i bhfad ó radharc an phobail nó ó rochtain phoiblí agus in go leor cásanna is féidir glacadh le teicneolaíochtaí nua ar nós córais bhogaigh agus iad sin a fhorbairt. Níl aon ghá feasta na botúin a rinneadh roimhe seo a dhéanamh arís agus Ionaid Chóireála Fuíolluisce a lonnú ar an gcósta agus dá bhrí sin gá a bheith le sceitheadh díreach isteach in uiscebhealaí nó amach sna cladaigh.

Iarraimid ar an gComhairle aghaidh a thabhairt go práinneach ar na deacrachtaí atá léirithe againn san aighneacht ghearr seo agus iarraidid, dá bhrí sin, go nglacfaí le dianrialacháin chuí chun cosc a chur le forbairt Ionaid Chóireála Fuíolluisce ag láithreáin áille cois cósta.

Is sampla iontach é ár suíomh ag Céibh an tSrutháin den chineál suímh atá íogair agus nach mór a mheas agus a bhainistiú go cúramach maidir le deacrachtaí comhshaoil, athrú aeráide agus Sláinte Poiblí. Níor cheart an láithreán seo a bheith curtha sa chomhaireamh riamh mar shuíomh oiriúnach d'Ionad Cóireála Fuíolluisce. Ina áit sin ba chóir é a ainmniú mar “Limistéar Áineasa agus Caithimh Aimsire” agus é sin a chosaint i bPlean Forbartha an Chontae. Iarraimid anois ar ár lucht pleanála agus ar ár gComhairleoirí tofa a chinntiú go dtugtar aghaidh ar ár n-inní agus go gcuirfear san áireamh iad i bPlean Forbartha Chontae na Gaillimhe 2022-2028.

***Tá aighneacht ar leith ceangailte maidir leis an iarratas criosála. (Aguisín B)***

**Aguisín A. Crios maolánach 100m -cordon sanitaire.**

**Plean Forbartha Chontae na Gaillimhe 2022-2028.**

**Aighneacht maidir le Réamh-Dhréacht den Chomhairliúchán Poiblí.  
Seolta ag Grúpa Pobail Chéibh an tSrutháin, An Cheathrú Rua.**

Molann Grúpa Pobail Chéibh an tSrutháin, An Cheathrú Rua go nglacfaí leis an rún seo a leanas go práinneach i bPlean Forbartha Chontae na Gaillimhe 2022-2028, rún ar ghlac baill tofa na Comhairle leis ag lánchruinniú de Chomhairle Contae na Gaillimhe an 25 Feabhra 2019.

*“That all new Public (Municipal) Wastewater Treatment Facilities (WWTFs) in Conamara to be constructed from here on forward by Irish Water, their agents or otherwise ,shall have a minimum cordon sanitaire (buffer zone), of 100m surrounding the WWTP plant site Boundary for the purpose of protecting sensitive receptors”*

*Foinse: Miontuairiscí Chruinniú Comhairle de Chomhairle Contae na Gaillimhe: 25 Feabhra 2019.*

<http://www.galway.ie/en/services/yourcouncil/meetings/councilmeetings/minutes2019/>

Ritheadh an rún seo agus cheadaigh baill tofa é i vóta ag lánseisiún de Chomhairle Contae na Gaillimhe:

**I bhfabhar: 21 I gcoinne: 3 Staonadh: 7 Gan-Vótáil: 0**

Tá sé de dhualgas ar an gComhairle éifeacht reachtúil cheart a thabhairt don rún seo anois.

Is ceist chomhionannas an cheist seo i ndáiríre agus thar aon ní eile cinnteoidh sí go gcaitear go cothrom le gach limistéar sa Chontae agus go bhfuil na rialacha agus na rialacháin go léir ann do chách. Tá sé tagtha chun solais go bhfuil crios maolánach 100m cosanta thart ar Ionaid Chóireála Fuíolluisce i bhformhór na bPleananna Baile i gContae na Gaillimhe ach i gcás Chéibh an tSrutháin agus cheantair eile i gConamara ní iarrtar ach 50m. Tá scéal den sórt sin éagórach agus imríonn sé leatrom ar an bpobal.

Ó tharla gur glacadh leis an rún seo agus le tromlach ollmhór freisin is ceart agus is cóir anois an riachtanas daonlathach a chomhlíonadh agus an rún a chur sa Phlean Forbartha Contae. Níl glacadh le haon ghníomh eile le éifeacht a thabhairt do mhian sainordaithe na gComhairleoirí atá tofa ag an bpobal le gníomhú mar ghuth daonlathach na ndaoine.

## **Aguisín B. “Crios Áineasa agus Caithimh Aimsire”.**

### **Plean Forbartha Chontae na Gaillimhe 2022-2028.**

#### **Aighneacht maidir le Réamh-Dhréacht den Chomhairliúchán Poiblí. Seolta ag Grúpa Pobail Chéibh an tSrutháin, An Cheathrú Rua.**

Tá éileamh dá dhéanamh ag Grúpa Pobail Chéibh an tSrutháin, An Cheathrú Rua atá ag iarraidh Céibh an tSrutháin a ainmniú mar “Crios Áineasa agus Caithimh Aimsire” i bPlean Forbartha Chontae na Gaillimhe 2022-2028.

Ní gnáth láthair ar bith Céibh an tSrutháin. Ceantar fíor thábhachtach speisialta atá ann gur ar éigin go bhfuil a leithid eile ar fáil sa tír ar fad. Suíomh stairiúil ag láthair den ardchaighdeán ó thaobh timpeallachta agus áilleachta atá ina áis luachmhar ag an bpobal ar fad lena glúinta anuas.

O thús deire is ceantar ard áilleachta an áit seo, ceantar iascaireachta, seoltóireachta is turasóireachta, áit atá i gcomharsanacht áiseanna lóistín do thurasóirí agus do scoláirí na gColáistí Gaeilge.

Tá leas dá bhaint cheana féin as áiseanna na Céibhe ag iascairí , bádóirí agus seoltóirí, lucht siúlóide agus fámairí, ag an duine áitiúil agus ag an turasóir ar aon agus iad i mbun a ngréithe nó i mbun caitheamh aimsire cois farraige is mara.

Tá branda na staire ar an áit seo agus tá sé fite fuaite i gcultúr agus i n-oidhreacht mara an cheantair. Tá clú agus cáil ar leith ar an gceangal atá ag an áit leis na Báid Mhóra-Húicéirí na Gaillimhe. Tá an oidhreacht staire agus cultúir sin thar a bheith tábhachtach agus ina dhlúth chuid de thraidisiún na badóireachta i gCuan na Gaillimhe agus thart timpeall ar Oileáin Árann. San am a caitheadh bhí an Chéibh ina láthair aonaigh margadh agus patrúin agus cabhlach Húicéirí le caladh ann nó ag seoladh leo fud fad Chuan iomráiteach na Gaillimhe ó dheas go hÁrainn nó soir go Cinn Mhara agus áiteacha nach iad.

Maireann an chuimhne sin sa seanachas, sna scéalta agus sna hamhráin. Tugtar an sean saol chun cuimhne sa lá atá inniu ann go bliantúil le linn Fhéile an tSrutháin agus le eagrú “Rás na Móna” ón Sruthán go Cinn Mhara.

Ba chóir daingniú a dhéanamh i bPlean Forbartha Chontae na Gaillimhe ar na mianta agus ar na haidhmeanna atá ag an pobal le fada an lá leis an gCéibhe a ainmniú agus a dhaingniú mar láthair forbartha do thograí pobail, caitheamh aimsire agus turasóireachta a mbainfeadh an pobal leas astú.

An daingniú sin atá dá éileamh againn leis an moladh seo le Céibh an tSrutháin a ainmniú mar “Crios Áineasa agus Caithimh Aimsire”.