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MKO> F.A.O. Planning Department, Galway County Council. Please find enclosed one Copy of our Submission
to The Country Development Plan (Stage 1 /Pre-Draft)
Castle Stal Holdings Group Should you have any queries with compliments
*With complements Kind Regards

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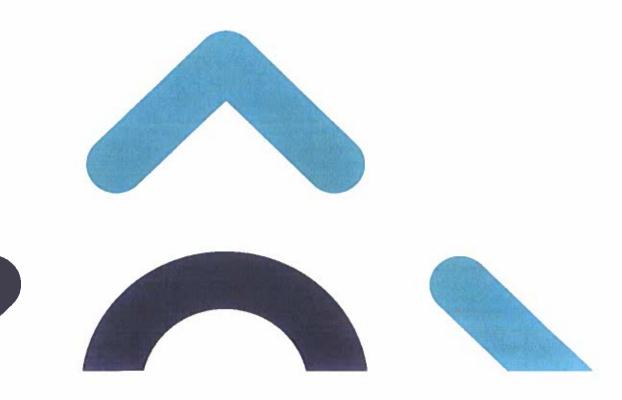
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County Development Plan Submissions

Galway County Council Stage 1 Pre-Draft Issues Paper Submission



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INTRODUCTION

MKO have been appointed by our client Ronan Barrett C/O Castle Star Holdings Group to make a submission to the Stage One (Pre-Draft) of the Galway County Council Development Plan 2022 – 2028 preparation process.

The Council set out that there are a number of key challenges to be faced in order to produce a suitable County Development Plan for the coming 6-year period from 2022 to 2028. These challenges include:

- Developing a unique identity and building on the strengths of the County.
- Living in the future and how it will be different.
- Growing the metropolitan area and other settlements within the County to achieve Compact Growth.
- Reducing our carbon footprint and achieving the national target of zero emissions by 2050
- Living sustainably without compromising future generations.
- Providing sufficient physical and social infrastructure to support economic development and to enhance our quality of life.
- Promoting town and village centre vibrancy and vitality with multi-functional uses including entertaining, living, gathering, working, shopping etc.
- Building on the provision of high-quality employment and economic opportunities at appropriate and sustainable locations.

These challenges can be met by producing an ambitious plan focused on sustainable development with emphasis on tourism and the enhanced development within and near the towns and villages, particularly within South Connemara.

This submission comprises the following sections:

- 1. Introduction
- 2. County Galway Overview
- 3. Stage One (Pre-Draft) County Development Plan Discussion
 - a. Strategic Issues
 - b. Specific Town and Village Considerations
- 4. Conclusions

Appendix L National Marine Spatial Planning Framework Strategy

Appendix 2 - RSES Submissions



COUNTY GALWAY OVERVIEW

The South Connemara Coast stretching from Galway City to Carraroe and onward to Ceantar na nOileán, the archipelago of islands comprising Leitir Móir, Garmna and Leitir Mealláin, is an Irish-speaking district in the West of County Galway, rich in the Irish language, music, heritage and culture, with a deep maritime heritage and an affinity to the sea. The region is the main link to the offshore Aran Islands and lies at the heart of Ireland's Wild Atlantic Way.

A region of contrasts – its backdrop of the Twelve Bens and its extensive bog complex, its multiple lakes, peninsulas and inlets, and its unique islands, all steeped in age-old Gaelic culture and tradition symbolise the essence of this Gaeltacht community located on the Wild Atlantic Way.

The South Connemara region stretches from the coast at Galway city to the shores of Lough Corrib and encompasses the villages and communities of Moycullen, Ross Cahill, Oughterard and Maam Cross which are located in the east of the region along the N59 National Road (a well-established and recognised Tourist route) and the separate coastal villages of Bearna, Furbo, An Spidéal, An Cnoc/Inverin, na Mine, Tullach, Baile na hAbhainn, Rossaveal, Casla and An Cheathrú Rua in the west which are linked together by the R336 coastal road which has developed as a separate Tourist route as part of the Wild Atlantic Way initiative.

The two distinct areas within South Connemara are separated by mountains and an extensive lake and bog complex, however the area is traversed by four important roads, which serve to link the area and its communities together as one region, specifically the Bearna to Moycullen road (11.3km), the L1320 Spiddal to Moycullen Road (13.9km), the Furnace Road from Costello/Casla to Oughterard (28.3km) and the R336 which runs from Costello/Casla to Maam Cross (20.3km).

The region is steeped in Irish Heritage and Culture and the Irish language and there is a deep maritime tradition and a history of ecclesiastical and religious heritage that has inspired writers, artists and musicians over the centuries. The Coast and Islands are renowned for stories and folklore that highlight the unique landscape attributes, the resilience and vibrancy of coastal and island life, and the ways in which this area has been a source of artistic inspiration for centuries.

The Wild Atlantic Way has had a positive impact on the number of Tourist that visit the South Connemara region, however the area's true Tourism potential has yet to be realised as it is severely hampered by the absence of dedicated tourism facilities and historic infrastructure deficits in the form of poor roads, inadequate water and waste water infrastructure. The deficit of dedicated Tourism facilities and inadequate infrastructure means that Tourist dwell times are limited, and the region is failing to unlock its true potential as an area to visit and to do business in. Much more now needs to be done to unlock the South Connemara region's true potential and to enhance the attractiveness of the area as a place to live and work in and to enhance the attractiveness of the area as a place to visit and stay.



STAGE ONE (PRE-DRAFT) OF THE GALWAY COUNTY COUNCIL DEVELOPMENT PLAN 2022 – 2028

This submission has been prepared in response to the Galway County Development Plan (CDP) Stage One (Pre-Draft) Plan and is intended to draw attention to strategic issues and the key infrastructural deficits that currently exist in the South Connemara region. We would request that these be addressed within the emerging County Development Plan.

Whilst this submission focuses exclusively on the issues specific to the villages and communities in the South Connemara district, it is believed that these concepts, ideas, suggestions and solutions can be replicated throughout County Galway as a whole.

This submission also seeks to build upon submissions that MKO have already made on behalf of our client to the Regional Spatial Economic Strategy (RSES) which came into effect on 24 January 2020 and on the National Marine Spatial Planning Framework Strategy.

The purpose of this submission is to highlight the key strategic goal which is to assist in the creation of a vibrant, self-sustained South Connemara region that is driven by the high quality of life and an educated workforce, by seeking the provision of an enhanced physical, economic, educational, cultural and social environment that reduces the percentage of the population which are disadvantaged, marginalised or at risk. Through careful and balanced strategic planning, we believe that proactive and constructive steps can be taken to improve the overall attractiveness of the South Connemara region as a place to live, work and play and to create a vibrant area that encourages new investment into the commercial, employment and residential sectors within the region.

3.1 Strategic Issues

The following are a list of strategic issues which the local Planning Authority should consider in in the preparation of the emerging County Development Plan (CDP) and the local planning policies and objectives within. These issues relate to South Connemara in particular and its enhancement as an attractive region to live in, work in, do business in and visit, and, as noted above, some can also be applied to the rest of the County.

3.11 Core Strategy and Housing

The emerging CDP should promote and facilitate the expansion and growth of communities in South Connemara, such as the Cois Fharraige district, and where there is already a pattern of residential development and/or established housing clusters. The plan should make provision for new planning applications in these areas to be viewed positively, with a presumption in favour of sustainable new residential development as appropriate.

The development of housing clusters should be viewed as an opportunity to introduce wider initiatives in support of the future upgrade of utility services to that locality.

Economic, Enterprise, Tourism and Retail Development

The policies included and direction this plan takes will be of utmost importance to the future of County Galway's economic, enterprise, tourism and retail development over the next plan period and beyond.



The key questions asked in the pre-draft plan should be answered, with ambitious targets being set for the enhancement of the economy through retail and tourism, in particular, for the benefit of the residents and visitors of County Galway.

A question was asked relating to "what policies should be introduced to further support town centre retailing and commercial activities that enhance the vitality and vibrancy of our town and village centres?"

In answer to this, we believe that it is pertinent to ensure that the following are implemented:

• A Retail Planning Strategy:

The success of Galway City as a retail destination and the move to online retailing is having a dramatic and detrimental impact on the retail fabric of many towns and villages within the County, where sustained high vacancy rates indicated the decline of retail facilities within the County. The new CDP should recognise the need for these towns and villages to adapt to this new retail environment, the change in shopping practices and the need to convert disused retail premises to alternative uses so that the vibrancy of the county's towns and villages is enhanced.

The CDP should also support the delivery of these essential retail facilities in villages and towns throughout the county that act as "Service hubs" for their immediate hinterland. In South Connemara, these Service hubs are Spiddal, Carraroe, Moycullen and Oughterard.

• Rising to the new challenges posed by Covid-19

As the county grapples with the new challenges posed by Coronavirus, it has become abundantly clear that there is a need to locate "Essential Services" such as healthcare facilities and Essential grocery and food stores, within no more than 3km of one's residential home. The South Connemara area is heavily reliant upon Galway City for many retail food stores and essential healthcare services. This reliance on Galway City creates an economic drain on the region and places the region at a distinct disadvantage where travel restrictions are imposed, for example as a result of Covid and/or similar pandemic events.

Galway County Council should promote and facilitate the delivery of "Essential Retail", in the forms of large retail and discount food stores, and "Essential Healthcare" facilities, particularly primary care centres, within key gateway villages within the South Connemara region, to include Carraroe, Spiddal, Moycullen and Oughterard.

In terms of tourism key questions to be expanded and answered include:

"What areas of the County have the potential to become sustainable key tourism attractions?" and

"How can the Plan policies help integrate enterprise land uses with other uses such as residential, transportation and tourism, etc?"

In answer to these questions, the following should be considered in depth and included throughout the Development Plan, with specific polices made on each of the below points.

New Coastal Greenway Blueways from Barna to Carraroe

The CDP should support and advance the delivery of a new coastal greenway and blueway walking, cycling and kayaking trail from Galway City, through Bearna along the coast of Galway Bay to An Cheathrú Rua on Cuan Casla [Casla Bay]. This new network should form part of a linked network of trails which will promote active tourism along the West Coast. Please note matter 2 (pg. 3-5) of the submissions made to the Marine Planning Policy Statement on this matter, attached to this submission as Appendix 1 for reference.



New Mountain/Lake Greenway to link the Connemara Greenway to the Coastal Greenway

The CDP should also promote and advance the delivery of a new greenway walking and cycling route along the coast and linked into the proposed Connemara greenway route. This new coastal route should be created as part of a cohesive network of looped routes, which could in turn be linked together to form a Cycle Tour route, by creating cycle links between;

- a. Bearna to Moycullen,
- b. Spiddal to Moycullen,
- c. Costello/Casla to Oughterard
- d. Costello/Casla to Maam

The delivery of these linked and looped routes should help to promote South Connemara as a destination for Cycling Tourism and would link into the National policy of promoting cycling. These new routes should also include provision for the installation of new Tour Bus stops at strategic elevated vantage points, at locations where there are strategic view of Lough Corrib and the Twelves Bens and/or strategic views of Galway Bay, the Clare Coast and the Burren and the Aran Islands. The Tour bus sector is an important source of Tourists and much more needs to be done to encourage tourists to visit and stay in the South Connemara region.

Promote South Connemara as an Adventure Tourism destination

The CDP should advance and promote the South Connemara region as an "Adventure Tourism" destination which promotes a range of outdoor pursuits, and the delivery of suitable facilities and associated accommodation and support services.

A specific goal of the CDP should be to promote the creation and delivery of a new Mountain Bike trail and adventure facility as a "Destination Attraction" along the new coastal tour route. We submit that such an outdoor pursuits and activity centre could be facilitated on commonage lands located at either Ballinahowan/Rossaveal and/or Carraroe, so that the local community and visitors to the area could benefit from such a new facility. This new facility would be an important "Destination Attraction" which can then be linked to other cycling networks and facilities promoted by Coillte.

Align the County Plan with Failte Ireland's Visitor Experience Development Plan

If the South Connemara region is to unlock its true potential as a Tourism destination, then it is critically important that the CDP is fully aligned with the strategic goals of Failte Ireland's Visitor Experience Development plan for the Connemara Coast and the Island's specifically;

- a. Promote and support the development of new coastal and inland loop walking and cycling trails as part of a network
- b. Promote and support the development of a new Connemara Coast Blueway network
- c. Promote and support the development of Tourism facilities at key Piers and Harbour locations, to include the provision of facilities for orientation, information, toilets, shelter, food kiosks and accommodation
- d. Promote and develop a Gaelic Experiential Trail
- e. Develop a network of Cultural Heritage Centres throughout Connemara and the Islands
- f. Promote and support the development of festivals which celebrate the regions deep maritime heritage
- g. Promote and support the development of a series of new food, music and cultural festivals within the region

Promote the development of a Camino Connemara

The CDP should also promote and facilitate the development of a "Camino Connemara" as part of an All -Ireland network of walking routes, linking together the country's deep ecclesiastical and religious



heritage sites and cultural heritage sites to include the numerous Heritage Piers and Maritime defence and Customs houses along the coast. Similar "Celtic Camino" initiatives are being adopted by other counties along the eastern and western seaboard and County Galway's ecclesiastical history, Maritime history and the history of the Aran Islands as an early Christian Ecclesiastical Centre, present a unique opportunity to attract both domestic and international visitors to the region.

Heritage Piers

The CDP should promote the concept of "Heritage Piers" so that the numerous piers and harbours along the coast as designated as Heritage Assets and promoted as destinations for recreation and amenity and as assets that can be used to promote water-based tourism and cultural tourism linked to South Connemara's affinity with the sea and the deep maritime heritage.

The CDP should also:

- Provide that all of the Piers and Harbours in County Galway that are not already owned or taken in charge by the county council should be acquired or taken in charge so that the local authority can take full responsibility for their repair and maintenance.
- Support and facilitate the creation of new facilities, to include toilets, shower and changing
 facilities and storage facilities at these piers so as to support water sports and water-based tourism initiatives.
- Support the provision of Orientation signage, public art, food kiosks and cultural tourism and heritage centre facilities at a number of key Heritage piers.

Geopark and Geo Tourism

The CDP should promote and facilitate the development of a Geopark and Geotourism initiative for the County which includes the Connemara Bog and Moycullen Bog Complexes.

A geopark is a unified area that advances the protection and use of geological heritage in a sustainable way, and which very importantly also promotes the economic well-being of the people who live there. The Geological Survey Ireland is a partner in all three of the Geoparks that have been created in Ireland currently and provides support and encouragement in the promotion of geoheritage and earth science education, and protection of Geosites within the Geoparks. Geotourism refers to the use of geoheritage as part of the local tourism product.

Designated Bathing Waters

The South Connemara area has a significant number of beaches that are not recognised as bathing areas and hence they are not properly monitored or serviced by the local authority. The CDP should promote an Audit of all beaches in the County with a view to then facilitating the delivery of "bathing status" to all of the beaches in the region so that water quality can be monitored and so that facilities can be enhanced, as there are a significant number of beaches in the area where the water quality is not monitored and where facilities are lacking.

The Council should seek to ensure that the local community take a proactive role in the monitoring and maintenance of these important assets and that "bathing status" is granted to each and every beach used by the public. Access and parking facilities for emergency services should be enhanced. Waste disposal and recycling and composting facilities should also be provided at all designated bathing areas/beaches.

3.13 Infrastructure and Transport

Infrastructure and transport are key themes to be addressed in detail in the emerging CDP. It is widely acknowledged that these are often issues which are found to be at or over capacity throughout the



County, with significant upgrading required. There is an opportunity with this emerging plan to ensure that the following matters are addressed, to ensure a sustainable future for the residents and visitors of County Galway.

Galway City Ring Road

The emerging CDP should seek to support and advance the delivery of the N6 Galway City Ring Road ("GCRR") as a means of enhancing accessibility to the West of Galway and the Connemara region as a whole.

Upgrade or replacement of the R336

The CDP should seek to advance the delivery of the upgrade and/or replacement of the R336 coastal road to provide for:

- a) Enhanced carriage way width
- b) Overtaking lanes
- c) Dedicated pedestrian footpaths
- d) Dedicated cycle lanes
- e) Off road Bus stops and Bus shelters
- f) Tourist Coach stops and Viewing points

Expansion of Connemara Airport

The CDP should promote and facilitate the upgrade and enhancement of Connemara Airport. As County Galway's only remaining airport facility, the Council should collaborate with Government to promote and facilitate the upgrade of the Airport to include improvements and works to widen the public access road, to expand carparking, and to enhance public and visitor facilities.

Provision should also be made to enhance the facilities at the Airport and to encourage the use of the Airport by private jets, and helicopters [to include the Coastguard and Air Ambulance services] as part of a process of enhancing accessibility to the Connemara region as a whole.

Enhance Public Transport and support Community Taxi initiatives

Whilst South Connemara [to Carraroe] is with the Galway Transport Strategy area, the region currently suffers from a deficit in Public transport services and is therefore heavily reliant on journeys by private transport. We support the enhancement of public and private bus services in the area, including the provision of "off-road bus stops and bus shelters".

In addition, the Council should also encourage the use of initiatives such as Rural Link, Social Spin and Community Taxi's as a means of facilitating local travel and combatting rural isolation, particularly amongst the elderly residents within our communities.

Fibre Optic Broadband

The CDP should support both Údaras's proposals to expand GTEIC facilities throughout the region and the Western Development Commission's initiative of promoting West Galway as an attractive place to live and work, by highlighting the availability of a high speed fibre optic broadband in the Cois Fharraige district, supporting initiatives to develop ICT businesses and facilities and by supporting initiatives which permit families to work from home by accommodating home offices, studios and workshop facilities within the accommodation, as appropriate, with valid planning permission.



Upgrade of Telecoms Infrastructure

The CDP should promote and facilitate working with Telecom Operators to upgrade and enhance mobile phone coverage in the South Connemara region.

High Pressure Sewerage Network

The CDP should promote and facilitate the delivery of a high-pressure sewer network by Irish Water as a technological solution to existing issues and to service South Connemara and other regions throughout the County.

The use of a high-pressure sewer system is an internationally accepted solution that can be utilised to overcome existing issues. This technology has been successfully adopted by Irish Water in Gweedore, County Dongeal.

Integrated Constructed Wetlands

The CDP should promote and facilitate the use of Integrated Constructed Wetlands (ICWs) as an alternative waste water collection and treatment solution for use in the villages and communities in Connemara, and throughout county Galway that are currently un-serviced by public facilities. Irish Water has successfully utilised ICW's throughout the country as an alternative to WWTP's. The use of this technology in South Connemara and elsewhere throughout the county should be promoted and supported.

There are numerous examples nationally, where Irish Water in conjunction with the local authority have developed ICWs as public amenities and walks that enhance the local amenity and public realm of the towns and villages that they serve.

Upgrade of Potable Drinking water facilities and capacity

The CDP should promote and facilitate the upgrade and enhancement of the Potable Drinking Water network in the South Connemara region, as there are regular drinking water outages and shortages throughout the County.

Uniform standards throughout the County - Cordan Sanitaire Buffer Zones

The CDP should promote and facilitate the adoption of a uniform policy to be applied throughout the entire county, which provides for a minimum cordon sanitaire buffer zone distance of 100 metres to be applied as the <u>only accepted standard</u>, between the nearest residential/sensitive receptor and any new Waste Water Treatment plant facility proposed by Irish Water. This standard should be imposed as the uniform standard for the entire County, as the adoption of "dual standards" in different areas has historically led to unnecessary litigation resulting in planning delays and delays in the delivery of new infrastructure. It is therefore important that each and every citizen in the County is treated equally and fairly.

Transfer of Waste Water treatment plants from Údaras to Irish Water

The South Connemara district currently suffers from a Waste Water Collection and Treatment infrastructure deficit as the majority of villages and communities within the district have no access to public facilities and the region is overly reliant on the use of septic tanks as a result. This presents a major issue going forward as the new Water Framework and River Basin Management Directives will impose higher standards within the region. There is, however, a potential solution as there are 15 Waste Water Treatment plants in the region which are in public ownership through Údaras na Gaeltachta.



The CDP should therefore promote and facilitate the transfer of all 15 Waste Water Treatment Plant facilities from Údaras na Gaeltachta to Irish Water, so that local communities in the South Connemara Gaeltacht region can secure access to this waste water collection and treatment network and so that new residential and commercial development can be encouraged and facilitated in the proximity of these locations.

Clear and concise policies on Waste Water

As a result of national policy the future of small towns and villages in West Galway and Connemara, and County Galway as a whole, will be heavily reliant upon the existence of municipal waste water collection and treatment systems, therefore the Public's current inability to access Údaras owned WWTP that exist in South Connemara could have a detrimental impact on the future development of the villages and settlements in the Connemara/Cois Fharraige district, unless this matter is addressed now.

It is clear from existing policies and planning decisions that;

- It is a Strategic Aim outlined in the Galway County Development Plan 2015-2021 'To facilitate
 in a sustainable manner the provision of necessary water and waste water infrastructure.'
- Current settlement policies discourage one-off rural housing and encourage development in established settlements.
- The alternative to one-off rural housing is to facilitate and encourage housing developments in smaller towns and villages. However, many smaller settlements in West Galway/Connemara do not have public wastewater treatment facilities.
- It is a matter of record that Galway County Council and An Bord Pleanála have recently
 refused planning permissions due to the absence of public municipal WWTP. These are
 inconsistent with the extant Galway County Development plan, which includes policies,
 objectives and standards in support of the development of small settlements and villages as
 well as the use of private WWTP's and shared WWTP's.
- Irish Water currently has no plans to provide new WWTP's or collection systems in the
 majority of the small settlements or villages in South Connemara and therefore without
 immediate intervention, the future growth of these small settlements and villages in
 Connemara/Cois Fharraige will be stifled.

The Galway County Development Plan outlines various policies and objectives in support of rural housing developments and in support of existing settlements and villages however, it is clear that the Council's stance on private WWTP and its stance on communal WWTP is very different from what happens in practice and therefore when considered against this backdrop, it appears that there is currently little or no prospect of securing planning permission for new developments in Galway's smaller towns and villages whilst this unpublished policy is practiced.

We therefore request that the emerging Galway County Development Plan includes the following points within its policies and policy objectives:

- Provide proper guidance and a clear and concise statement to confirm whether private and communal WWTP's are permitted.
- Provide clear and unambiguous guidance on the format and duration of management regimes
 and criteria that should be applied to private & communal WWTP's which, if permitted, need
 to be satisfied in order to maintain a discharge licence.
- Provide clear and unambiguous guidance to confirm that private & communal WWTP's, which if permitted, must be subject to the Discharge Licence regime to allow compliance with Environmental standards to be monitored by the Local Authority.

We also request that there are no dual standards applied to planning applications between the State Agencies and the private citizens and businesses, with only one uniform standard across the board applied to all planning applications.



Environment, Renewable Energies and Communications

Where Renewable Energy projects are proposed in the region, we would support the CDP imposing an obligation on the Developer to establish a "Community Fund" to support "Community Gain". This Community Fund should provide annual grants and disbursements to support local community groups and local initiatives.

31.5 Architectural and Archaeological Heritage

It is agreed and widely known that County Galway has a rich and diverse array of historic buildings and archaeology. In answer to the questions,

- "How can the new County Development Plan promote awareness of the County's past which
 includes Protected Structures, ACA's and archaeology?", and
- "How can we secure the protection of our archaeological features including landscapes into the future?"

The CDP, in conjunction with the OPW should promote and facilitate an Archaeological Audit of the entire South Connemara region and the Aran Islands as a means of documenting the areas deep and historic early Christian, ecclesiastical, monastic and religious, maritime, Napoleonic and military and cultural heritage, to include the Ecclesiastical history of the Aran Islands.

The core purpose of this Audit should be to utilise the information gained to develop an Ecclesiastical Heritage Trail as part of the Tourism strategy for the region. The success of the Skellig's in County Kerry is a good example of how a regions history can be brought to life and the history of the Aran Islands is an as yet untapped resource that could be better harnessed by the region.

316 The Galway Gaeltacht

The Galway Gaeltacht is the largest Gaeltacht population in Ireland, representing almost half of the Gaeltacht population. Therefore, it is imperative that this is protected and enhanced as much as possible to ensure the identity of these regions are not eroded and lost in time.

In answer to the questions asked in the Stage 1 (pre-draft) plan, we would support and encourage the consideration of the following in the emerging County Development Plan:

Protection and Promotion of traditions unique to the Gaeltacht

There are numerous examples of traditions that are unique to the Gaeltacht which need to be protected and promoted to ensure they are not lost to time.

Specific supports in the CDP should be introduced to help foster, protect and promote these traditions which include:

- sean-nós singing and dancing,
- boating (Galway Hooker),
- boat building,
- Gaeltacht style country music,
- harvesting seaweed,
- the celebration of patron days, religious festivals, holy wells and other religious practices.

These traditions are all an important component of the South Connemara region's deep religious, maritime, cultural and linguistic heritage.



Protection and Promotion of the Irish language colleges and Mna an Ti

The Colaiste Gaeilge are an important component of South Connemara and they make a significant contribution to the protection and preservation of the Irish language and the Gaeltacht way of life and tradition. The Colaiste are also a very important employer that make a significant contribution to the local economy.

The CDP should promote and facilitate the continued growth and expansion of the Irish college sector to include supporting the upgrade and enhancement of college facilities and accommodation facilities for students and teachers. This support should also be extended to the host families [Mná an Ti] in the development, upgrade and expansion of their homes to enable them to host students attending the Coláiste.

Cultúrlann

The CDP should also promote the development of a "Cultúrlann" (similar to the facility at Cultúrlann McAdam O'Fiach in Belfast's Gaeltacht Quarter) dedicated to the promotion of the Irish language, Irish traditional music, Irish traditional theatre and culture, and sean-nos singing and dancing. The delivery of this Cultúrlannin should be located in the old convent facility in An Spidéal, in South Connemara and should be a key goal within the lifetime of the emerging County Development Plan.

3.1.7 Agriculture, Fishing Marine and Forestry

The marine heritage and economy in Galway makes an important contribution to the County's rural economy, tourism and traditions, and it is vital that this is enhanced and promoted in the emerging County Development Plan, to ensure its economy prospers and its heritage is not lost.

The below matters should be considered and addressed within the emerging CDP, particularly in answer to the questions asked such as "how can the Council support sustainable means of agriculture fishing and forestry related activities?" and "how can the new County Development Plan manage County Galway's maritime resources ensuring a balance is maintained between social, economic and environmental issues?".

Protection and Promotion of the Galway Hooker boat tradition

The CDP should promote and facilitate the protection of traditions that are unique to the Gaeltacht and unique to the coastal community in South Connemara. The Galway Hooker boat and sailing traditions are an important Maritime heritage and an example of a unique Gaeltacht tradition, and are under severe threat of extinction. Currently, only the Cruinniú na mBád festival in Kinvara is promoted, however the source destination/berth of the boats that participate in this festival are also under threat.

The CDP should ensure that there are sufficient policies and objectives within the Plan which will protect and promote the County's deep maritime heritage, to include the promotion of the unique Galway Hooker boat tradition, the preservation of the boats and protection and enhancement of the associated sailing skills, and the tradition of boat building and sail making within the County.

Provision should be made for supports to be created which give strategic and financial aid to ensure the protection, preservation and development of this important maritime tradition, including assistance with the marketing of annual festivals and their promotion as an important Tourist attraction.

Maritime Cultural Heritage Centre

The CDP should promote and facilitate the development of a Cultural Heritage Centre, dedicated specifically to the Galway Hooker and the South Connemara regions maritime Heritage. The delivery of this flagship Tourism facility should be a key goal within the lifetime of the new County



Development Plan. This Heritage Centre should be located at a heritage pier on Cuan Casla [Casla Bay], which is an important centre for the Galway Hooker boat tradition.

Expansion and Diversification of Rossaveal Harbour

The CDP should promote the expansion and diversification of commercial activity at Rossaveal Harbour, to include:

- a. the delivery of a Deep Water Port by the Department of Agriculture, Fisheries and the Marine,
- b. the delivery of other employment opportunities in the form of:
 - i. a GTEIC facility
 - ii. Marine Tourism facilities
 - iii. Marine Research facilities
 - Information Communication and Technology and Medical Devices facilities,
 - v. Film, Radio, Media and Animation facilities,
 - vi. a Seaweed Biorefinery and processing plant
 - vii. the promotion of the Port complex as a Marine Energy base location for the promotion, development and servicing of Offshore Wind and Wave Energy facilities in the Renewable Sector should be encouraged and promoted.
 - viii. A Tourist Visitor Centre, to capitalise on the high volume of Tourist traffic that utilise the port to visit the Aran Islands and the new private yacht marina

As well as supporting the traditional fish processing sector activities, the range of activities and employment opportunities at the port should be diversified and expanded.

Specific Town and Village Considerations

The following towns and villages should be considered in detail in the emerging development plan, with a specific action plan, policies and objectives, focussing on the enhancement of each location in relation to the points set out below.

3.2.1 Bearna

The CDP should promote and facilitate the delivery of a new coastal walkway, cycleway and blueway from Galway City to Bearna village and from Bearna to Furbo along with the delivery of the following at Bearna/Freeport Pier:

- Orientation and information signage
- Public Art
- Public seating
- Enhanced parking
- New facilities to include toilets, shelter, food kiosks and waste collection, recycling and composting facilities

The CDP should also:

- Promote the upgrade and expansion of the Primary School in the village
- Encourage and facilitate the removal of all overhead cables and power lines in favour of locating all services underground
- Promote and encourage the development of the undeveloped site between the Creche and the Twelve Hotel as an "Opportunity site" for redevelopment.
- Promote and encourage the use of the Truskey Stream and Harbour area as a suitable location for the promotion of white-water kayaking, coasteering, gorging and water sports/adventure sports activities.



- Promote and encourage the refurbishment, enhancement and rethatching of the traditional stone and thatched cottage within the heart of the village, to include the use of the property as a residential home and/or as a potential retail outlet and/or a Tourism orientation facility.
- Promote and facilitate the development of a new Public Square within the village, to include
 the installation of public seating and public realm improvements to include the development
 of a new Promenade and playground facility adjacent to the Harbour area.

3.2.2 Furbo

Promote and facilitate the delivery of a new coastal walkway, cycleway and blueway from Bearna village to Furbo and from Furbo to An Spidéal and to promote and facilitate the delivery of the following at Furbo beach;

- Orientation and information signage
- Public Art
- Public seating
- Enhanced parking
- New facilities to include toilets, shelter, food kiosks and waste collection, recycling and composting facilities

The CDP should also:

- Encourage and facilitate the removal of all overhead cables and power lines in favour of locating services underground.
- Promote and facilitate the development of a new Public Square within the village, to include the installation of public seating and public realm improvements
- Promote and facilitate the transfer of the WWTP in the village from Údaras na Gaeltachta
 to Irish Water, so that the local community can secure access to this waste water treatment
 network to allow new residential development to be encouraged and facilitated and to
 cease unauthorised and unlicensed discharges to Galway Bay.
- Promote and facilitate the delivery of a high pressure sewer network by Irish Water to service the Cois Fharraige district and Furbo village in conjunction with the transfer of the WWTP from Údaras to Irish Water.
- Promote and facilitate the use of Integrated Constructed Wetlands as an alternative waste water collection and treatment solution for use in Furbo village.
- Address the discharge of untreated waste water to Galway Bay and facilitate and deliver a Green Flag/Blue Flag award to Furbo beach.
- Seek the transfer of responsibility and oversight of all Waste Water Discharge licences from the Local Authority to the EPA.

3.2.3 An Spideál

Spiddal is an important "gateway" village to South Connemara and its geographic location ensures that it has the potential to become an important service centre whilst the scenic coastal location and its links to a scenic mountain/lake drive from Moycullen presents the village with an opportunity to capitalise on its huge potential as a tourism destination that will help facilitate growth and prosperity within its hinterland by strengthening the economy of the village, by attracting new investment in employment, services, retail facilities and tourism facilities. The delivery of a new Waste Water Treatment plant to the village by Irish Water [scheduled to commence in 2021, with commissioning scheduled for early 2022], will act as a catalyst to support the growth of the village. To assist with this, Galway County Council and the new County Development Plan should;



- Promote and facilitate the delivery of a new coastal walkway, cycleway and blueway from Furbo to An Spidéal and from An Spidéal to Inverin
- Promote and facilitate the delivery of the following at Spiddal's two beaches and Harbour Piers;
 - Orientation and information signage
 - Public Art
 - o Public seating
 - Enhanced parking
 - New facilities to include toilets, shelter, food kiosks, waste collection, recycling and composting facilities
- Encourage and facilitate the removal of all overhead cables and power lines in favour of locating services underground.
- Promote and facilitate the development of a new Public Square within the village, to include the installation of public seating, public art and public realm improvements
- Promote and encourage the use of the Boluisce River and Harbour area as a suitable location for the promotion of white-water kayaking, coasteering, gorging and water sports/adventure sports activities
- Promote and facilitate the transfer of the WWTP in the village from Údaras na Gaeltachta to
 Irish Water, so that a wider section of the local community [particularly those in the Pairc area]
 can secure access to this waste water treatment network and so that new residential
 development can be encouraged and facilitated.
- Promote and facilitate the delivery of a high pressure sewer network by Irish Water to service
 the Cois Fharraige district and Spiddal village in conjunction with the transfer of WWTPs from
 Údaras to Irish Water.
- Promote and facilitate the use of Integrated Constructed Wetlands as an alternative waste water collection and treatment solution for use in Spiddal village.
- Address the discharge of untreated waste water to Galway Bay and facilitate and deliver a
 Green Flag/Blue Flag award to each of Spiddal's beaches.
- Encourage and facilitate the delivery of a woodland walk and river walk around the environs
 of Spiddal House and the Boluisce river.
- Encourage and facilitate the completion and delivery of the final section of the Promenade.
- Encourage and facilitate the delivery of a "Cultúrlánn" as a cultural Venue, Traditional Music
 Venue and Cultural Theatre within the village, potentially on the site of the current Convent which is located in the heart of the village.
- Promote and facilitate the upgrade of the existing Public library to include adult learning and after school study facilities.
- Promote and facilitate the expansion of the Primary School and Secondary school within the village to provide for the future needs of the local community and the hinterland of the village.
- Promote and facilitate the expansion and upgrade of facilities utilised by the Irish Colleges
 within the village and the wider locality.
- Promote and facilitate the development of an Information, Communication and Technology
 Media Park in the village by Údaras to capitalise on the regions deep strengths in media,
 animation television and radio sectors and to capitalise on the availability of high speed fibre
 optic broadband facilities available in the village and the Cois Fharraige region.
- Explore the feasibility of creating a "Water Bus" tourism facility from the village of Spiddal to
 key destinations in County Clare (similar to the Tarbet Ferry service) as a means of promoting
 Tourism between both counties and revitalising the traditional communication links created by
 the traditional turf boat trading routes that existed throughout this coastal region.
- Encourage and facilitate the delivery of a Tourism orientation and information centre within the village.
- Encourage and facilitate the creation of Tourism links with Moycullen, to include a new greenway walking and cycling route from the proposed Connemara Greenway route to link



into a new coastal route as part of a cohesive network of looped routes, linked together to form a Cycle Tour route. This should include the installation of new Tour Bus stops at strategic elevated vantage points, where there are strategic views of Lough Corrib and the Twelve Bens and/or strategic views of Galway Bay, the Clare Coast and the Burren, and the Aran Islands.

- Strengthen and enhance Spiddal's attraction as a Tourism destination by encouraging and
 facilitating the delivery of new high quality Hotel facilities, hostels and other accommodation
 to include additional facilities such as tennis Courts, and "wet weather" attractions such as an
 aquarium, swimming pool & leisure facilities, a cinema, an activity centre and glamping and
 camping facilities to include dedicated parking and facilities for camper vans and touring vans.
- Strengthen and enhance Spiddal's status as a key district centre by revitalising the village's "Market Town" status by promoting the revival of a weekly farmers market, and by promoting an annual food festival and an annual fair day celebration.
- Promote and deliver an off-road bus stop and bus shelter.
- Promote and deliver off street parking to include a new public carpark and public realm
 enhancements targeted to improve the attractiveness of the villages for pedestrians and to
 discourage on street parking which causes traffic congestion in the village and along the R336.
- Encourage and promote the development of the TG4/Ros na Ruin television set as a tourist
 attraction, to include a visitor tour, as a means of showcasing the wealth of creative and artistic
 talent within the region.

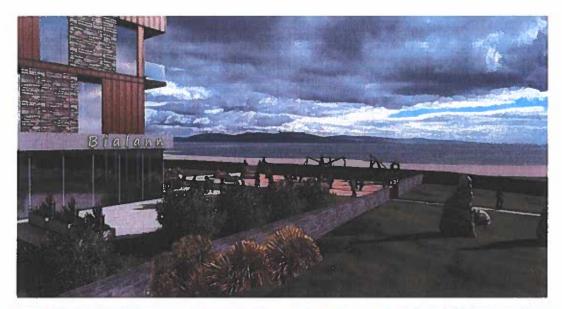




Figure 1 Indicative Computer-Generated Image of Proposed New Hotel in Spiddal



3.2.4 Inverin

- Promote and facilitate the delivery of a new coastal walkway, cycleway and blueway from An Spidéal to Inverin and from Inverin to na Mine/Tullach/Ballinahowan.
- Promote and facilitate the delivery of the following at Inverin beach;
 - Orientation and information signage
 - o Public Art
 - o Public seating
 - o Enhanced parking
 - New facilities to include toilets, shelter, food kiosks, waste collection, recycling and composting facilities
 - Enhance footpaths within the village, particularly between the schools, Irish colleges, community halls and the church for the benefit of the local community and visitors to include Irish college students.
 - Promote the delivery of an off-road bus stop and bus shelter.
 - Encourage and facilitate the removal of all overhead cables and power lines in favour of locating services underground.
 - Promote and facilitate the development of a new Public Square within the village, to include the installation of public seating and public realm improvements.
 - Promote the enhancement and continued expansion of the Irish college facilities and
 associated residential accommodation for students and teachers in the locality as a means of
 supporting the Irish college sector and the local economy.
 - Promote and facilitate the transfer of the WWTP in the village from Údaras na Gaeltachta to
 Irish Water, so that the local community can secure access to this waste water treatment
 network and so that new residential development can be encouraged and facilitated
 - Promote and facilitate the delivery of a high pressure sewer network by Irish Water to service
 the Cois Fharraige district and Inverin village in conjunction with the transfer of WWTP's from
 Údaras to Irish Water,
 - Promote and facilitate the use of Integrated Constructed Wetlands as an alternative waste water collection and treatment solution for use in the village.
 - Address the discharge of untreated waste water to Galway Bay and facilitate and deliver a Green Flag/Blue Flag award to Inverin beach.

3.2.5 Na Mine, Tullach, Ballinahowan

- Promote and facilitate the delivery of a new coastal walkway, cycleway and blueway from Inverin to na Mine/Tullach/Ballinahowan and then onwards to Rossaveal.
- Promote and facilitate the delivery of the following at Tullach beach;
 - o Orientation and information signage
 - o Public Art
 - o Public seating
 - Enhanced parking
 - New facilities to include toilets, shelter, waste collection, recycling and composting facilities
- Enhance footpaths within each village, particularly between the schools, Irish colleges, community halls and the church.
- Encourage and facilitate the removal of all overhead cables and power lines in favour of locating services underground.
- Promote the delivery of an off-road bus stop and bus shelter.
- Promote and facilitate the development of a new Public Square within the village, to include the installation of public seating and public realm improvements.



- Promote the creation of a Tourist visitor centre and/or Tour at TG4 which promotes the history of Irish language media.
- Promote and facilitate the transfer of the WWTP in the village from Údaras na Gaeltachta to
 Irish Water, so that local community can secure access to this waste water treatment network
 and so that new residential development can be encouraged and facilitated.
- Promote and facilitate the delivery of a high pressure sewer network by Irish Water to service
 the Cois Fharraige district and each village.
- Promote and facilitate the use of Integrated Constructed Wetlands as an alternative waste water collection and treatment solution for use in each village.
- Address the discharge of untreated waste water to Galway Bay and facilitate and deliver a Green Flag/Blue Flag award to Tullach beach.
- Promote and facilitate the upgrade and enhancement of Connemara Airport at an Caisleann
 na Mine/Inverin as the regions only remaining airport facility, to include improvements to the
 public access road, carparking, facilities. Provision should also be made to enhance the facility
 and to encourage the use of the Airport facility by private jets, and helicopters [to include the
 Coastguard and Air Ambulance services] as part of a process of enhancing accessibility to the
 region as a whole.
- Conduct an Archaeological study of the history of the Castle at An Caisleann, Inverin with a
 view to including the structure on a heritage trail which forms part of the greenway, blueway
 initiative along the coast.

3.2.6 Rossaveal

- Promote and facilitate the delivery of a new coastal walkway, cycleway and blueway from na Mine/Fullach/Ballinahowan to Rossaveal [via Baile na tSleibe] and from Rossaveal to Carraroe as part of a dedicated greenway/blueway facility around Casla Bay.
- Promote and facilitate the celebration of the area's deep ecclesiastical, maritime, military and cultural heritage by promoting a greenway and blueway looped walk that encompasses the coastal area from Bad Colmcille near Ballinhowan, the coastguard station and pier at Baile tSliebhe and the Napoleonic War battery/Martello tower at Rossaveal, on wards towards, Costello lodge in Casla [retreat of Bruce Ismay of Titanic infamy], and the Heritage Piers at Casla Pier, Sruthán Pier and ending on the opposite side of the bay at Temple Mhic Dara in Barraderry Carraroe.
- Promote and facilitate the delivery of the following at Rossaveal Harbour;
 - Orientation and information signage
 - o Public Art
 - Public seating
 - New facilities to include toilets, shelter, food kiosks, waste collection, recycling and composting facilities
- Encourage and facilitate the removal of all overhead cables and power lines in favour of locating services underground
- Promote the delivery of an off-road bus stop and bus shelter.
- Promote and facilitate the development of a new Public Square within the village of Rossaveal, to include the installation of public seating and public realm improvements
- Promote the creation of a vibrant harbour and marina environment that supports cultural tourism and marine tourism initiatives in the area.
- Promote and facilitate the delivery of new hotel accommodation and leisure facilities within the vicinity of the harbour and the yacht marina.
- Promote and facilitate the establishment of a Visitor Centre and ancillary retail and support services at this important Tourism Gateway.



- Promote the enhancement and continued expansion of the Irish college facilities and associated residential accommodation for students and teachers in the locality as a means of supporting the local economy.
- Promote and facilitate the transfer of the WWTP in the village from Údaras na Gaeltachta to
 Irish Water, so that local community can secure access to this waste water treatment network
 and so that new residential development can be encouraged and facilitated.
- Promote and facilitate the delivery of a high pressure sewer network by Irish Water to service
 the Cois Fharraige district and each village in conjunction with the transfer of WWTP's from
 Údaras to Irish Water.
- Promote and facilitate the use of Integrated Constructed Wetlands as an alternative waste water collection and treatment solution for use in each village.
- Address the discharge of untreated waste water to Galway Bay from the Port and from the Údaras WWTP with a view to enhancing water quality within the Bay.
- Promote and facilitate the enhancement of water quality within Casla Bay with a view to making the Bay area a centre of excellence for marine sports and water-based tourism initiatives.
- Promote and facilitate the installation of a helicopter landing pad within the Port for use by the Coastguard and Air Ambulance services and private operators as part of a process of enhancing accessibility to the region as a whole.
- Conduct an Archaeological study of the Martello Tower at Rossaveal and the surrounding bay area with a view to including the structure on a heritage trail which forms part of the greenway, blueway initiative along the coast. The Casla Bay area is surrounded by important structures from many periods in Irish history, from prehistoric ringforts, early Christian churches and holy wells to Napoleonic gun batteries and Martello towers. The Casla Bay Area is a microcosm of Irish history, archaeology and these buildings and structures are excellent examples of Irish vernacular, ecclesiastical, military and coastal defence architecture throughout the ages. These structures should be listed, repaired and brought back into use as Tourist attractions in their own right.
- Promote the expansion of commercial activity at Rossaveal Harbour, to include;
 - the delivery of a Deep Water Port by the Department of Agriculture, Fisheries and the Marine
 - the delivery of other alternative employment opportunities in the form of;
 - GTEIC facility
 - Marine Tourism
 - Marine Research
 - ICT, Medical Devices,
 - · Film, Radio, Media and Animation,
 - a Seaweed Biorefinery and Seaweed processing facility,
 - Wet weather Tourist attractions to include a Marine Tourism/Maritime heritage
 Visitor Centre, Retail shopping and an Aquarium,
- Promote the utilisation of the port as a Marine Energy base location for the promotion, development and servicing of Offshore Wind and Wave Energy facilities in the Renewable Sector.
- Promote and facilitate the creation of a Mountain Bike park and trail as part of an outdoor pursuits centre, located on commonage lands in the Ballinahowan/Rossaveal area.
- Evaluate the feasibility of introducing a water taxi facility between Rossaveal Harbour and Sruthán Pier as part of an initiative to promote water based Tourism in the entire Casla Bay
- Promote and facilitate the upgrade and enhancement of the Potable Drinking Water network
 in the South Connemara region, specifically in Rossaveal. The Cois Fharraige District regularly
 suffers from drinking water outages and shortages. The problem is particularly acute in the
 Rossaveal and Carraroe areas, when the Irish Summer Colleges are in operation and when



there are water shortages in the Aran islands since water is shipped from Rossaveal to the Islands. The Local Authority should work alongside the community, the Irish Colleges and Uisce Éireann to address these infrastructure deficits.

• The existing Galway County Council owned/Irish Water storage facility at Rossaveal is an unsightly facility on the top of a hill – efforts should be taken to screen this facility. There is also an opportunity to collaborate with Irish Water to convert the facility into a dual use facility, to introduce parking, seating and screening and to utilise the facility as an attractive tourist viewing platform that can be used to view the Twelve Bens mountain range, Galway Bay, the Burren, Casla Bay and the Aran islands. This initiative could be pursued in tandem with the existing use as a water storage facility and it could be linked to the Greenway/Blueway initiative that is referenced elsewhere in this submission.

3.2.7 Casla/Costello

- Promote and facilitate the delivery of a new coastal walkway, cycleway and blueway from Rossaveal to Costelo Lodge and the Costello and Fermoyle Fishery and onwards to Casla/Costello village.
 - Promote and facilitate the delivery of the following at Casla Pier:
 - o Orientation and information signage
 - o Public Art
 - o Public seating
 - Enhanced parking
 - New facilities to include toilets, shelter, food kiosks waste collection, recycling and composting facilities
- Promote the delivery of an off-road bus stop and bus shelter.
- Promote the enhancement of footpaths within the village and create a dedicated link with Costello lodge and the Costello and Fermoyle Fishery which are important Tourism assets to the village.
- Promote the creation of a Tourist visitor centre and/or Tour at RnaG which promotes the history of Irish language media.
- Encourage and facilitate the removal of all overhead cables and power lines in favour of locating services underground.
- Promote and facilitate the development of a new Public Square within the village, to include the installation of public seating and public realm improvements.
- Promote and facilitate the transfer of the WWTP in the village from Údaras na Gaeltachta to
 Irish Water, so that local community can secure access to this waste water treatment network
 and so that new residential development can be encouraged and facilitated.
- Promote and facilitate the delivery of a high pressure sewer network by Irish Water to service
 the Cois Fharraige district and the village in conjunction with the transfer of WWTP's from
 Údaras to Irish Water.
- Promote and facilitate the use of Integrated Constructed Wetlands as an alternative waste water collection and treatment solution for use in the village.
- Address the discharge of untreated waste water to Galway Bay.
- Upgrade and widen the road bridge link between Casla and Clyngah/Carraroe.
- Advance and deliver a new greenway walking and cycling route from the proposed Connemara Greenway route from Maam Cross to link into a new coastal route as part of a cohesive network of looped routes, linked together to form a Cycle Tour route, by creating cycle links between;
 - a) Costello/Casla to Oughterard
 - b) Costello/Casla to Maam



The delivery of these routes should include the installation of new Tour Bus stops at strategic
elevated vantage points, where there are strategic view of Lough Corrib and the Twelves Bens
and/or strategic views of Galway Bay, the Clare Coast and the Burren and the Aran Islands,

3.2.8 Sruthán Pier

- Sruthán is an important Heritage Pier location and an important Marine leisure and recreational amenity centre for sailing, diving, water sports and it is a berth for a large number of Galway Hooker boats.
- The CDP should recognise Sruthán as a Heritage Pier, due to its religious and cultural heritage
 and its status as a key berth for the Galway Hooker fleet (An Bád Mór) and numerous
 Gluiteog, Pucan and Naomhog.
- The CDP should promote the creation of a vibrant harbour and marina environment that supports leisure and recreational use, which supports and enhances Cultural tourism and marine tourism initiatives in the area, specifically the promotion of the Galway Hooker Boat tradition, sailing, diving and boat building traditions. Advantage should be taken of the opportunities identified in the Marine & Leisure Development strategy 2007-2013 produced by the Marine Institute.
- The CDP should promote and facilitate the creation of enhanced berthing facilities to include a marina. The CDP should promote and facilitate the creation of a water taxi between Rossaveal and Sruthán Pier as a local Tourism initiative.
- The CDP should promote and facilitate the delivery of a new coastal walkway, cycleway and blueway from Rossaveal to Casla/Costello and onward through Clynagh to Sruthán Pier on onwards along the coast to Tra na Reilige, Barraderry to include the three beaches that exist on that side of the Casla Bay area.
- The CDP should promote the deep religious and cultural heritage significance of Sruthán pier through the installation of Heritage signage and its inclusion in the Camino Connemara.
- The CDP should promote and facilitate the delivery of the following at Sruthan Pier:
 - o A Marine Heritage Centre that celebrates the traditional Galway Hooker boat
 - Orientation and information signage
 - Public Art
 - Public seating
 - Enhanced parking
 - New facilities to include toilets, shower and changing facilities, shelter, food kiosks waste collection, recycling and composting facilities.
- As there is significant and sustained opposition to Irish Water's proposals to locate a Waste Water treatment plant facility adjacent to the Pier, the CDP should support the selection of an alternative location which should be identified within the locality. There is no reason why an Integrated Constructed Wetland facility could not be pursued by Irish Water at an alternative location such as the commonage lands between Sruthán and Clyngah/Casla amongst the many benefits of utilising an Integrated Wetland, that facility could also be used to service the needs of the communities in Clyngah and Casla as well as the residents of Carraroe and Sruthán.

3.2.9 An Cheathru Rua/ Carraroe

Carraroe is an important "gateway" village to South Connemara and its geographic location ensures that it has the potential to become an important service town that supports the Ceantair na hOilean district. Whilst the scenic coastal location and its links to a scenic mountain/lake drive from Maam and Greatman's Bay/Cilciaran presents the village with an opportunity to capitalise on its potential as a tourism destination that will help facilitate growth and prosperity within its hinterland by strengthening the economy of the village, by attracting new investment in employment, services, retail facilities and tourism facilities. The delivery of a new Waste Water Treatment plant in the form of an Integrated



Constructed Wetland to the village by Irish Water will act as a catalyst to this growth, albeit that the proposed location of that WWTP will have to be revised by Irish Water if that goals is to be achieved.

To assist with this, Galway County Council and the new County Development Plan should;

- Seek to consolidate the existing village by introducing traffic calming measures, and by promoting off street carparking facilities and enhanced wayfinding signage.
- Promote and facilitate the creation of Carraroe as an outdoor activity destination by supporting
 the development of a Mountain Bike park and trail around the Carraroe peninsula as part of
 an outdoor pursuits centre, located on commonage lands in the vicinity of Carraroe.
- Promote Carraroe and the surrounding coastline area as an adventure sports location with a
 particular focus on water sports and mountain biking and an area which offers opportunities
 for niche activities such as angling, wakeboarding, deep sea diving, sailing, sea kayaking,
 canoeing, coasteering, bird watching, dolphin watching, landscape painting and tourism linked
 to geological heritage, maritime heritage and military heritage.
- Strengthen and enhance Carraroe's attraction as a tourism destination by encouraging and facilitating the delivery of new high quality hotel facilities and accommodation to include additional facilities such as tennis Courts, and "wet weather" attractions such as an a public swimming pool & leisure facilities, a cinema, and tourist accommodation to include an activity centre, glamping and camping facilities to include dedicated parking and facilities for camper vans and touring vans, which capitalise on the importance of Trá an Doilin as a key attraction in the area.
- Strengthen and enhance Carraroe's s status as a key district centre by;
 - Encouraging the preservation of traditional rural pubs and the establishment of restaurant facilities,
 - o Revitalising the villages "Market Town" status by promoting the revival of a weekly farmers market, an annual food festival and an annual fair day.
 - Promote the upgrade and enhancement of the day hospital facilities in the village in the form of a new Primary Care Centre,
 - Promoting the construction of a discount food retail store in the village [to reduce the current reliance on the need for long journeys to Galway City or Clifden],
 - Encouraging the redevelopment and enhancement of existing, unused or derelict structures for reuse as new homes and businesses.
- Promote the enhancement and continued expansion of the Irish college facilities and associated residential accommodation for students and teachers in the locality as a means of supporting the local economy.
- Promote the delivery of an off-road bus stop and bus shelter.

3.2.10 Ceantar na nOileán

This is the archipelago of islands comprising Leitir Móir, Garmna and Leitir Mealláin.

The archipelago has the potential to become an important tourism destination on the Wild Atlantic Way but currently lacks a unique "hook product" that would encourage visitors to go off the beaten track.

The signal station at Golam Head on Lettermullan Island [known as "Tór Golam"] has the capacity to become such a "hook product destination". The Tower is located on the summit of the low hill at the south west of the headland, at 29m OD.

The headland is only accessible on foot for an hour or two either side of low tide and even then involves wading through shallow water with masses of seaweed.



The Signal station was part of an extensive coastal defence network and early warning system during the Napoleonic era. The site has expansive views in all directions except the north east. The adjacent signal station to the south on Inishmore is easy to spot on a clear day but the largely destroyed station to the north west on Ard Castle Hill can no longer be seen from this location.

A unique opportunity exists to create a Tourism attraction at this location, that would encourage domestic and international tourists to visit this unique area. This can be easily achieved by introducing a rope bridge that can be used to access the Golam headland, so that the local community and Tourist Visitors can access the headland and signal tower. The rope bridge would be similar to that used at the Carrick a Rede Rope Bridge in Ballycastle, in Northern Ireland, which is a major tourist attraction in its own right.

3.2.11 Maam Cross

The CDP should promote and facilitate the delivery of the Connemara Greenway project.

- The CDP should promote and facilitate the delivery of the following at Maam Cross:
 - Orientation and information signage
 - Public Art
 - Public seating
 - Enhanced parking
 - New facilities to include toilets, shelter, food kiosks, waste collection, recylcing and composting facilities
- Promote the delivery of an off-road bus stop and bus shelter.
- Promote the enhancement of footpaths within the village and create a dedicated link to the old Railway station which has the potential to be an important tourist attraction.
- Promote the delivery of the train line as a key Tourist attraction and as a Tourist visitor centre.
- Promote the delivery of a Public carpark facility at Maam Cross which can be used as a location for the weekly farmers market.
- Promote the enhancement of the farmers market as a food fair and as an annual festival.
- Encourage and facilitate the removal of all overhead cables and power lines in favour of locating all services underground.
- Promote and facilitate the development of a new Public Square within the village, to include
 the installation of public seating and public realm improvements.
- Promote and facilitate the use of Integrated Constructed Wetlands as an alternative waste water collection and treatment solution for use in the village.
- Advance and deliver a new greenway walking and cycling route from the proposed
 Connemara Greenway route to link into a new coastal route as part of a cohesive network of
 looped routes, linked together to form a Cycle Tour route, by creating cycle links between
 Costello/Casla to Maam.
- The delivery of these routes should include the installation of new Tour Bus stops at strategic
 elevated vantage points, where there are strategic view of Lough Corrib and the Twelves Bens
 and/or strategic views of Galway Bay, the Clare Coast and the Burren and the Aran Islands.

3.2.12 Oughterard

- Promote, advance and deliver a new greenway walking and cycling route from the proposed Connemara Greenway route to link into a new coastal route as part of a cohesive network of looped routes, linked together to form a Cycle Tour route, by creating cycle links between Costello/Casla to Oughterard.
- The delivery of these routes should include the installation of new Tour Bus stops at strategic elevated vantage points, where there are strategic view of Lough Corrib and the Twelves Bens and/or strategic views of Galway Bay, the Clare Coast and the Burren and the Aran Islands
- Promote the delivery of an off-road bus stop and bus shelter.



- Promote and facilitate the delivery of the following within the village:
 - a) An off-street Public carpark facility to reduce on street parking and reduce congestion
 - b) Public realm enhancements
 - c) Orientation and information signage
 - d) Public Art
 - e) Public seating
 - f) New facilities to include toilets, shelter, waste collection and composting
- Promote the enhancement of footpaths within the village and create a dedicated link and walkway from the village to Lough Corrib.

3.2.13 Moycullen

Moycullen's geographic location ensures that it has the potential to become an important service town to its hinterland as well as acting as a commuter town to Galway City. The scenic mountain view/lakeview location and the scenic drive from Moycullen to Spiddal presents the village with an opportunity to capitalise on its potential as a tourism destination by creating a looped link with Spiddal and the Wild Atlantic Way that will help facilitate growth and prosperity within its hinterland by strengthening the economy of the village, by attracting new investment in employment, services, retail facilities and tourism facilities. To assist with this, Galway County Council and the new County Development Plan should;

- · Promote and facilitate the delivery of the Connemara Greenway,
- Promote and facilitate the delivery of a new Blueway, canoeing and kayaking facility by utilising the old Canal network and lake network to support adventure tourism,
- Create direct links with the Wild Atlantic Way touring route network by advancing and
 delivering a new greenway walking and cycling route from the proposed Connemara
 Greenway route to link into a new coastal route as part of a cohesive network of looped routes,
 linked together to form a Cycle Tour route, by creating cycle links between Moycullen and
 Spiddal and from Moycullen to Bearna,
- The delivery of these routes should include the installation of new Tour Bus stops at strategic elevated vantage points, where there are strategic view of Lough Corrib and the Twelves Bens and/or strategic views of Galway Bay, the Clare Coast and the Burren and the Aran Islands,
- · Promote the delivery of an off-road bus stop and bus shelter,
- Encourage and facilitate the removal of all overhead cables and power lines in favour of locating all services underground,
- Promote and facilitate the development of a new Public Square and Public park within the village, to include the installation of public seating, public art and public realm improvements,
- Promote and facilitate the delivery of:
 - o Orientation and information signage
 - o Public Art
 - o Public seating
 - Enhanced parking
 - New facilities to include toilets, shelter, food kiosks, waste collection, recycling and composting facilities
- In conjunction with the creation of a Blueway, promote and encourage the entire area as a suitable location for the promotion of white-water kayaking, and water sports/adventure sports activities.
- Promote and facilitate the delivery of a Community Centre in the old Co-op building to include adult learning and after school study facilities.
- Promote and facilitate the expansion of the Primary School in the village.
- Promote and facilitate the development of a new Secondary school within the village so that school children do not need to commute to Galway City to attend secondary school.



- Promote and facilitate the protection of the villages Gaeltacht status by encouraging the use of Irish language on a daily basis and by supporting the use of traditional signage and the use of the Irish language on shopfronts and signage.
- Promote and Support the delivery of the Moycullen bypass.
- Promote and Support the delivery of a new basketball arena and training facilities.
- Support the upgrade and expansion of the existing WWTP facilitate.
- Secure OPW funding for the upgrade of the Surface Water network in the village.
- Promote and facilitate the development of an Information, Communication and Technology
 Media Park in the village with the support of Údaras na Gaeltachta to include the delivery of a
 new GTEIC facility.
- Encourage and facilitate the delivery of a Tourism orientation and information centre within the village, possibly as part of the redesignation of the Coop facility as a community hub.
- Strengthen and enhance Moycullen status as a key district centre by promoting the delivery of a Discount Food retail store and by revitalising the village's "Market Town" status by promoting the revival of an annual food festival and an annual fair day.



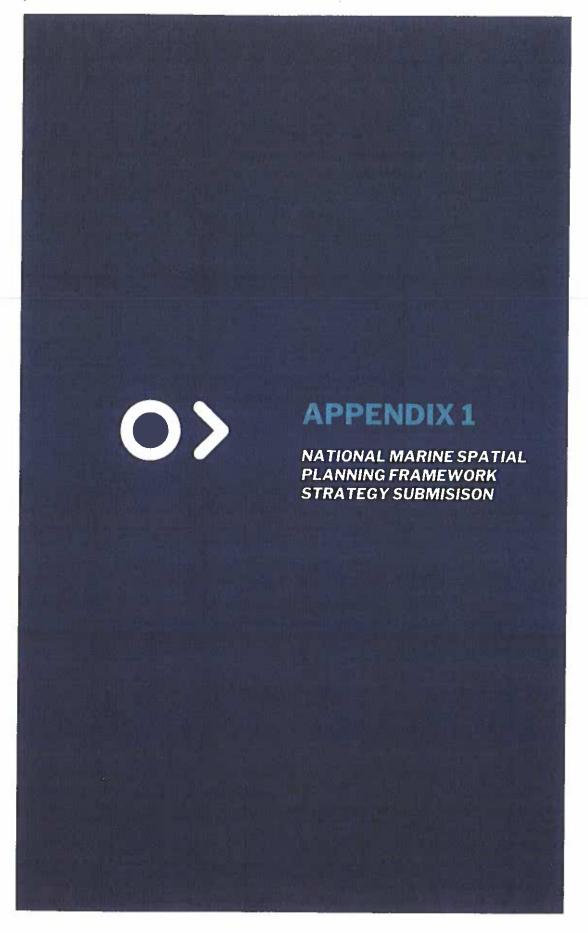
CONCLUSIONS

Ultimately, the County of Galway is one which is rich in history and has an attractive natural environment which draws people to visit as tourists, to live and to work. There is a rich and varied culture which has the opportunity to be embraced and promoted to enhance the tourism opportunities across the County and make the County of Galway an even more attractive place to be.

However, it is clear that County Galway is not without its issues, particularly in relation to transport and infrastructure. The emerging plan offers the Local Authority the opportunity to apply uniform standards and policies throughout the entire county, to remove all ambiguity and to provide clear and concise guidance on buffer zone standards and on the appropriate maintenance regime and standards that should apply to private and communal WWTP's. This plan offers the Local Authority the opportunity to put policies and objectives in place to ensure that those issues and matters discussed above are realised and appropriate measures are in place to resolve, alleviate or mitigate these matters.

Additionally, the emerging plan offers the Local Authority the opportunity to ensure that the appropriate measures are in place to protect and promote the hugely important cultural heritage of Galway, from the protection of the Irish language and the unique traditions of the Gaeltacht region to the protection and promotion of the region's Maritime heritage to include the promotion of the unique Galway Hooker boat tradition.







Marine Planning Policy Statement Submissions By email msp@housing.gov.ie

Our Ref: Your Ref:

190743

07 August 2019

Re: Submission to the Marine Planning Policy Statement (Consultation Draft)

Dear Sir/Madam,

We have been instructed by our client Ionad Oidhreachta na mBádóiri, with a registered address at to make a submission to the Marine Planning Policy Statement - Consultation Draft (MPPS) which was launched by the Department of Housing Planning and Local Government on 10th June 2019. Our client has gained recent experience of planning at the interface of marine and coastal activities through the proposed development of a marine and cultural heritage centre at An Sruthán Pier, Carraroe, County Galway (Planning Authority Reference: 18/1605). Accordingly the following comments are based on first hand expertise of existing systems and on observations of the vison presented in the MPPS.

Our client commends the introduction of Irelands first MPPS which parallels the 2015 Planning Policy Statement that underpins terrestrial planning in Ireland. The ultimate objective of the MPPS must be to clarify the vision for the marine planning system in Ireland, - a marine planning system that will balance the different demands for using the sea, while protecting the marine environment.

Our submission focuses on the following planning matters:

- 1. The current lack of coordination between state bodies in relation to critical infrastructure;
- Support for cultural/marine tourism initiatives that safeguard and promote the unique maritime heritage of the west coast of Ireland, specifically in relation to Casla Bay;
- 3. Significant improvements are required in the forward planning, development management and enforcement stages of the marine planning system.

1. Lack of Coordination between State Bodies

We note that Section 5 of the MPPS refers to overarching principles and high-level priorities for Ireland's marine planning system. Ten strategic principles are identified which our client supports.

Strategic Principle No. 4 states:

'Marine planning will take into account land-sea interactions. Land-sea interactions (LSIs) are complex and take many forms but can broadly be described as either being related to land-sea natural processes (the effect of dynamic natural processes on coastal environment and on coastal socio-economic aspects), or interactions among land and sea uses and activities (almost all maritime uses need support infrastructure on land with some uses eg tourism existing



mostly on the land, which is in addition to activity at sea). In practice, because of the nature of the marine environment and the land-sea interactions being a gateway between land and sea interests, the impact of decisions at the coast in particular can have far-reaching and diverse impacts. Consideration of LSI as it relates to the environment, society and economy should be a feature of each part of the marine planning system. Alignment between marine and land-based planning elements should be sought where possible to ensure efficient and coherent consideration of LSI. Local authorities will have a key role to play in this regard.'

Our client's experience with its planning application for a marine and cultural heritage centre at An Sruthán Pier, Carraroe, County Galway (see Table 1 for summary of proposal) highlights a lack of coordination and strategic thinking between government stakeholders in respect of land-sea interactions in Casla Bay, County Galway (the bay area).

By way of background information, planning permission was refused by Galway County Council for the proposed marine and cultural heritage centre on 11th January 2019 for five reasons including the prematurity of the proposal pending the provision of public sewerage facilities. An Irish Water Compulsory Purchase Order (CPO) for the proposed Carroroe Sewerage Scheme on the Sruthán Pier land was submitted to An Bord Pleanála on 12th December 2018 for determination under ABP Ref: PL07.303244. Our client objected to the CPO and a date for an oral hearing was set. Irish Water subsequently withdrew from this process and the CPO was deemed annulled on 16th April 2019.

Table 1: Summary of Proposed Marine and Curtural Heritage Centre An Sruthán Pier

Marine and Cultural Heritage Centre			
Multi-Activity Hub	Design Features		
Maritime Tourism Visitor Centre The Story of the Galway Húicéir	 A central exhibition and display room area; A multi-function audio-visual room to include meeting space and training area; A cafe/kitchen/coffee dock Toilets Office facilities 		
Marine Sports Complex (Multi Activity)	Changing and shower facilities A wet room Small boat and equipment storage room Mooring and anchorage Pontoon and jetty Boat storage Loading and unloading area Outside showers Visitor Parking		
Community, Cultural & Coast Guard Facility	 Coast guard station and radio equipment Meeting and exhibition space Audio-visual equipment 		

The Irish Water proposal to build a new waste water treatment plant (WWTP) at Sruthán Pier which will serve part only of Carraroe village would utilise lands in a culturally important location in the Connemara Gaeltacht and a pivotal section of the Wild Atlantic Way. It does not appear that alternative locations have been considered for the WWTP, whilst significantly there is no alternative location for a marine and cultural heritage centre. It is our client's contention that there should be



more joined- up, collaborative action required between state bodies that own/operate and plan for critical infrastructure to service the Connemara region. For example, the proposed expansion of Rossaveal Harbour to include a new deep-water port could have supported the rationale for a new WWTP to serve the bay area in its entirety. Furthermore, there are already three WWTPs owned by Údarás ns Gaeltachta located in industrial zoned lands which surround the bay area that are not utilised by the surrounding community. These are located and used by companies in industrial estates which are not accessible to local residents and communities. Such communities are prevented from growing and developing without access to basic waste water collection and treatment infrastructure.

Our client advocates that all WWTPs owned by Údarás na Gaeltachta should be transferred to Irish Water as the water services utility with responsibility for water infrastructure nationally. This would address the anomaly where water infrastructure is held by a state body that is not a water services utility (i.e. Údarás na Gaeltachta) and does not have a legislative power or responsibility to open that infrastructure for use by local residential communities.

Gaeltacht and rural communities along the peripheral west coast of Ireland are predominately disadvantaged by inadequate infrastructure and there is no logic in restricting those communities from gaining access to and use of state-owned waste water treatment infrastructure where such infrastructure is already in place. Alternatively, Údarás na Gaeltachta should have the statutory powers and budget to act as a water services utility in Gaeltacht areas so that local residential communities can be connected into state owned WWTP infrastructure.

Based on this experience, our client therefore fully supports the alignment between marine and landbased planning elements to deliver a marine planning system with coordinated stakeholder input.

2. Support for Cultural/Marine Tourism Initiatives specifically in relation to Casla Bay
We support the inclusion of policy objectives that support Ireland's marine-related cultural and heritage assets.

Strategic Principle No. 8 states:

'The marine planning system will support the preservation and enjoyment of Ireland's rich marine heritage – both natural and cultural – and our marine-related cultural and heritage assets.'

Our client fully supports Strategic Principle No. 8 based on direct experience in respect of the An Sruthán Pier cultural heritage centre proposal alluded to above. It further reinforces the vision for the enhancement and protection of the marine and riverine environment as outlined in the document "Waterbased Tourism—A Strategic Vision for Galway". The lands at An Sruthán Pier have a rich cultural heritage and connection to the story of the Galway Húicéir. The húicéir was an essential part of coastal life, a workhorse and mode of transport linking communities in Connemara and the Aran Islands. Throughout generations, the húicéir and the local piers from which they operated were an essential means of survival for the people of the Connemara Gaeltacht.

Tourism in the West- An engine for growth and Jobs (November 2015) states that the counties along the Western Seaboard are more heavily dependent on tourism than in any other part of the country. The report outlines several 'Gaps and Opportunities' which should be expanded upon in order to promote the natural resources that the west has to offer. One of the key opportunities that was outlined in this document was the development of coastal tourism which incorporates the provision of

1



marinas, islands and boat trips. It is essential for the marine planning system to support the preservation and enjoyment of the marine related cultural assets such as An Sruthán Pier.

2.1 Casla Bay

Fáilte Ireland has referenced Casla Bay as a water body of potentially significant tourism potential – particularly for the promotion of water based tourism and cultural and heritage based tourism initiatives. Casla Bay, which includes the Port and villages of Rossaveal, Casla and Carraroe, is a critically important Tourism Gateway hub to The Aran Islands, Ceantar na H'Oileann (The Connemara Archipelago) and as a gateway to the wider Connemara Gaeltacht.

Approximately 160,000 to 200,000 tourists pass through Rossaveal Port each year and furthermore, the area is home to Radio na Gaeltacht and TG4. There is significant untapped potential to convince these tourists to increase their stay in the area and to thus drive economic development to the greater Gaeltacht area. This should be done through the promotion of;

- Water based Tourism Initiatives and;
- Cultural and Heritage Tourism Initiatives

Both Údarás na Gaeltachta and Fáilte Ireland are promoting a strategy to advance cultural tourism initiatives in this area of South Connemara as a means of addressing identified tourism infrastructure deficits in this section of the Wild Atlantic Way. They also aim to promote a strategy which aims for the formation of sustainable job creation and retention in the South Connemara Gaeltacht in a sensitive way that protects the language and the cultural heritage of the wider area. One of the ways this could be implemented is through the promotion of the Seaweed Industry which has significant potential in the Tourism, Food and Medical science and cosmetic sectors.

The Casla Bay area also has a large number of Cultural and Religious Heritage Assets which links to the pilgrim way heritage associated with the Aran Islands as an ancient monastic settlement. This can be made comparable to the significant Religious and Heritage tourist attraction, Skellig Michael located off the west coast of Kerry. The Connemara Archipelago Tourism Plan 2019 to 2021 is a phased tourism plan for the Lettermullan and Ceantar na nOileán area to be implemented over a three-year timeframe. The ambition is to leverage the tourism opportunity to deliver economic benefit to the area and its communities whilst respecting the cultural, environmental and historical uniqueness of Ceantar na nOileán. As stated in the Plan "Not only is it a Gaeltacht, it is also the only road-accessible archipelago in Ireland." The following recommendations were included to ensure the development of a successful tourism industry in Ceantar na nOileán.

- Embrace the new Flagship Experience Seeing the islands as one destination working together rather than individual islands competing with each other
- Tourism and the Irish Language By promoting spoken Irish, it has the potential to be one of the biggest attractors and become a strong marketing tool that will drive business to the area.
- Cultural and Heritage Tourism The uniqueness of Ceantar na nOileán presents an opportunity to become part of a series of cultural heritage attractions in the wider Gaeltacht area.
- Leverage off existing Tourism assets

 The proposed tourism network covering an area from Barna to Carna is likely to play a central role in the development of tourism in the south Connemara region. This network is also anticipated to be a key participant in the pan-Connemara network, Connemara and Aran Islands Tourism Network, which has arisen from the Fáilte Ireland Visitor Experience Plan published in 2018.



A significant number of Maritime Heritage and Military Heritage sites around Casla Bay have the capacity to be linked up to create a unique coastal Blueway and a combined cycle and looped walking route, specifically linking a number of assets on the Galway Protected Structure list including;

- Saint MacDara's church, Barraderry, Carraroe
- Costello Lodge Derrynea [Number 734]
- Cill Treasa Rossaveal [Number 736]
- Martello Tower at Rossaveal built in the 1830's as a protection against French invasion [Number 721]
- Former Customs station at Ballintleva [built in 1875 to address the challenges posed by smuggling] and laterally a base for the Black and Tans in Connemara in 1913 – 1921 [Number 722]
- Bád Colmcille at Ballinahowan [A stone structure reputed to have ferried the Saint to the Aran Islands
- Castle at Na Minna near the Airport [associated with the Martin Family and the Browns]

In order to unlock the tourism potential of Casla Bay area as acknowledged by Fáilte Ireland, the following strategies must be implemented:

- > Better co-ordination between the State bodies that are Stakeholders in the area;
- A strategic review of Rossaveal Port;
- A combined local area plan for the villages of Rossaveal, Casla and Carraroe;
- A strategic review of all Waste Water Collection and Waste Water treatment infrastructure to include:
 - i. Existing Waste Water Treatment Plant's owned by Udarás na Gaeltachta at Rossaveal, Casla and Carraroe
 - Waste Water discharge licenses issued by Galway County Council to local industrial factories
 - iii. Irish Water Plans
- A strategic review of water quality (and the impact of the aforementioned wastewater issues) to assess the impact on:
 - i. Tourism potential of Casla Bay
 - ii. Impact on the Shellfish area at inverin
 - iii. Impact on Kilkieran Bay SAC
 - iv. Impact on Seaweed industry/seaweed quality
 - v. Impact on local Pot fish industry (Lobster crab)
 - vi. Impact on the Salmon and Trout Fisher Costello and Fermoyle (Privately owned)

This submission recommends that Casla Bay should be suggested as a model where the objectives of the *Marine Spatial Planning Strategy* should be implemented. Our client has discussed this concept with the Marine Institute, and they have expressed an interest in getting involved in such an initiative.

3. Improvements required in the Irish Marine Planning System

Currently the majority of planning, licensing and regulation of Irish maritime activity is carried out on a sectoral, demand-driven basis, with no overall plan having been established. Responsibility for enforcement is split between local authorities, the Office of the Planning Regulator, and the Minister for Housing, Planning and Local Government, with no body/competent authority having overall responsibility to ensure that efforts to properly execute the forward plans and to ensure that development management decisions are complied with. This submission supports the inclusion of policy objectives that will enhance the planning system for marine-related projects.



Strategic Principle No. 10 states:

'Strategic Principle No. 10

The marine planning system will treat all marine interests in a fair and transparent manner when decisions are being made in the marine environment and will ensure that early and effective public engagement with the public and all marine stakeholders is undertaken across all forward planning, development management and enforcement elements of the system.'

This submission wishes to raise the following issues:

- There are multiple Waste Water Discharge licences and Septic Tank licences in the immediate Cuan Casla Bay area that are issued by Galway County Council, however the potential to connect these to a single WWTP in Rossaveal, servicing the entire area has never been assessed properly by Irish Water;
- There are already significant capacity and discharge quality issues at the Údarás na Gaeltachta's plant in Rossaveal which [because of its licence from Galway County Council is being used to discharge waste collected from other Udaras plants which include Pearse's cottage [collection Tank] and the Údaras facility at Tulllach [near Ballinahowan];
- We note that both Casla [Costello] and Rossaveal were identified in the Galway County Council Water Services Assessment of Needs report published in 2006, which highlighted the need for new WWTPs at these locations. Both villages were then withdrawn from the updated Needs Assessment 2009 report based on cost/budget grounds due to the then prevailing economic situation.

A marine planning system based on fair and transparent decision making involving all marine stakeholders is supported with a view to achieving joined up, strategic thinking to support quality marine planning outcomes.

Summary of Submission

The MPPS sets out five priorities to deliver on the key principles by which the Government will be guided. Our client is fully supportive of:

- A. An up to date, robust legislative framework;
- B. An integrated marine forward plan as a parallel to the National Planning Framework;
- Greater awareness and understanding of the marine planning system/marine planning processes;
- D. Transparent and fair decision making; and
- E. Robust governance and enforcement systems to support quality marine planning outcomes.

The MPPS is a very welcome development in the area of planning and environmental law; it indicates a reinvigorated Government intention to undertake comprehensive reform of Ireland's marine planning system. The creation of the National Marine Planning Framework will ensure that Ireland's maritime area is developed in accordance with an overarching vision of supporting biodiversity, preserving our marine heritage and transitioning to a low-carbon economy.

In summary our client is supportive of the MPPS which should be harnessed as an opportunity to ensure that planning for Ireland's marine environment is done in a transparent, joined up and strategic manner in order meet environmental, economic and social objectives. Our submission

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requests the Department to give further consideration to improving/addressing the following planning issues:

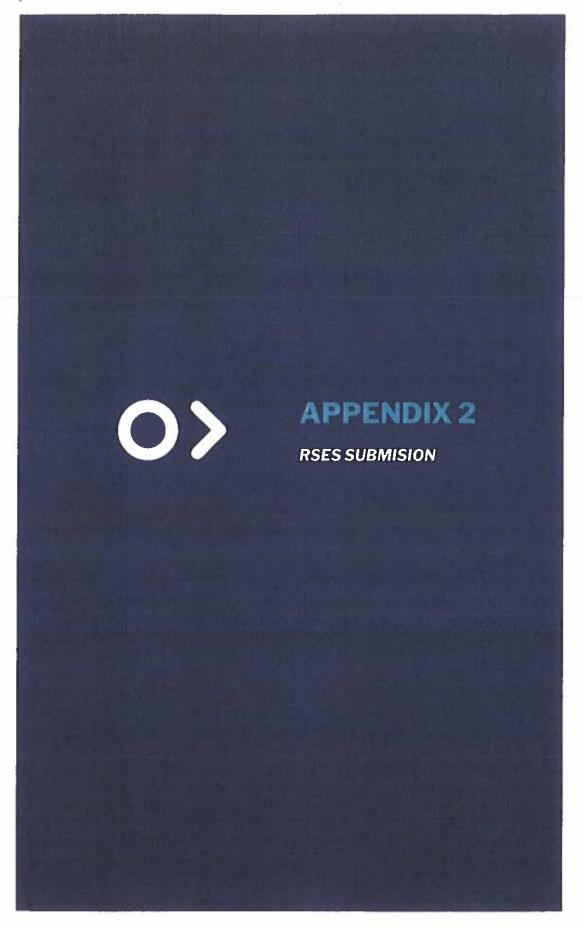
- The current lack of coordination between state bodies in relation to critical infrastructure;
- Support for cultural/marine tourism initiatives that safeguard and promote the unique maritime heritage of the west coast of Ireland and specifically in relation to Casla Bay;
- 3. Significant improvements are required in the forward planning, development management and enforcement stages of the marine planning system.

Our client, Ionad Oidhreachta na mBádóiri, welcomes the opportunity to provide further comment on the MPPS and looks forward to continued engagement in the development of the marine planning system.



Sarah Hill Planner MKO







RSES Material Amendments Submission By email rsesma@nwra.ie

Our Ref:

170136c

08 October 2019

Re: Submission to the Draft Regional Spatial and Economic Strategy on the proposed Material Amendments

Dear Sir/Madam,

We have been instructed by out client Ronan Barrett of the Castle Star Holdings Group, to make a submission on the Material Amendments to the "Draft Regional Spatial and Economic Strategy' (RSES) consultation, following its recent publication on the 26/07/2019. The ultimate objective of the RSES must be to allow the entire region to develop to its full potential. This includes ensuring the region has the right enabling infrastructure and services to drive sustainable development, meet economic goals and improve the quality of life. It is vital that the North West Regional Assembly through the RSES can harness the potential of the North West Region and establish the improvements needed in order for the region to become a more compact and connected place.

Following a review of the directors' report on the RSES it is noted that there are a number of positive amendments proposed to the draft RSES, specifically the recommendations to replace Regional Policy Objective 26 with the following;

Tourism

"To support the preparation and implementation of Visitor Experience Development Plans (VEDP's) within the Northern & Western Region, to underpin the overarching regional tourism benefits and to promote the natural and cultural assets of the Region."

Our client welcomes this material amendment to the draft RSES in advance of his plans for a new Hotel Complex in Spiddal and additional plans for a new Cultural Heritage Visitor Attraction at Sruthán Pier, Carraroe, Co. Galway.

However, our client wishes to address the following omissions from the Material Amendments to the Draft RSES that may impede the implementation of the plan if not addressed now. The following four key areas need to be addressed in tandem in order to unlock the Tourism potential of South Connemara and other areas along the Wild Atlantic Way to promote sustainable jobs in the tourism industry in a way that is sympathetic to the unique cultural, maritime and linguistic heritage of the Gaeltacht.



1. R336 Upgrade

The R336 is a Regional Road in County Galway which connects the N59 road at Leenaun beside Killary Harbour via Inverin to the N6 and N83 in Galway, 83 kilometres to the southeast. The R336 is a prime example of road infrastructure that needs to be upgraded and therefore facilitated for within the RSES. Delays to this project are now at 12 years since first commenced. This is simply unacceptable if the North West Region (and South Connemara and the Galway Gaeltacht in particular) is to grow and prosper as an economically viable centre. Within the material amendments to the Draft RSES there is no mention from the Director on the need to upgrade the R336 route. This road is a key transport route within the Wild Atlantic Way and greater Gaeltacht Region and needs to be prioritised and facilitated for within the RSES.

2. Rossaveal Port

The omission of a recommendation from the Director regarding the upgrade of Rossaveal Port (a key destination on the R336) is a significant oversight despite the fact that the Department of Agriculture Fisheries and the Marine has secured planning permission for the development of a deep water-berth at the Port. This is a glaring omission and a key reason for the R336 upgrade to be prioritised, in addition to its growing importance as a key route on the Wild Atlantic Way.

3. Deficit of Waste Water infrastructure in the Gaeltacht

Udarás na Gaeltachta has ownership of 15 Wastewater Treatment Plants (WWTP) throughout the county of Galway, together with 10 plants in Donegal and one in Cork. (See attached schedule in Appendix 1 below) There is a current legal anomaly where WWTP owned by Údarás cannot be accessed or utilised by members of the general public. As part of this submission, our client wishes to propose that all waste water treatment plants owned by Údarás na Gaeltachta be transferred to Irish Water as the Water Services utility with responsibility for Water infrastructure nationally. This proposition would then address the anomaly where water infrastructure is held by a state body that is not a water services utility (i.e. Údarás) and does not have a legislative power or responsibility to open that infrastructure for use by local residential communities. The omission of the need to utilise existing WWTP infrastructure owned by Údarás to address current deficits in the Irish Water/Municipal infrastructure that exists in South Connemara and other Gaeltacht communities in Donegal is an issue that needs to be addressed within the RSES.

Gaeltacht communities and Rural communities along the peripheral west coast of Ireland are predominately disadvantaged by inadequate infrastructure and there is no logic in restricting those communities from gaining access to and use of State-owned Waste Water treatment infrastructure where such infrastructure is already in place. Furthermore, this restriction is not only having a negative impact on residents in the Gaeltacht, but it will also impede on the deliverability of Fáilte Ireland's Visitor Experience Development Plan within the Region. As such, this issue needs to be addressed now so that the RSES can be implemented

4. Marine Spatial Planning Framework

The Material Amendments to the Draft RSES does not make any reference for the need to adopt the Marine Spatial Planning Framework. The adoption of this Framework would promote better co-ordination between land and sea planning along the coastal zone, improved co-ordination between government, semi-state and private stakeholders while facilitating the enhanced use of existing state-owned assets throughout the west of Ireland. This omission will not only have a



negative effect on the implementation of Greenway and Blueway initiatives along the western coast but also on initiatives focused upon the promotion of Marine Tourism in the Region. This issue needs to be addressed now so that the RSES can be implemented.

A further recommendation on behalf of our client is to seek the inclusion of a specific Objective within the RSES in the context of the promotion of Cultural, Marine and Heritage Tourism within Gaeltacht areas within the NWRA. The Objective reads as follows;

"To work with the Local Authorities, Údaras na Gaeltachta, Irish Water and all other State bodies and local stakeholders, to promote the Irish language, local Heritage & Culture in order to deliver high quality cultural & tourism products of Regional & National significance and as part of the relevant county development plan, to prepare a tourist strategy, which will focus on the enhancement of visitor offerings, road and transport access, accommodation and all additional infrastructure that might be needed to facilitate the implementation of Fáilte Ireland's Visitor Experience Development Plans, whilst taking into account all Natura 2000 sites and the requirements of the Marine Spatial Planning Framework Strategy."

We would welcome your input on the preparation of a further submission to the NWRA on the draft RSES, with a view to seeking the inclusion of the specific objectives referenced above.

5. Local Area Plans

To support tourism initiatives and the growth and long term success of the Wild Atlantic Way initiative, there is a need for medium to long term planning policies which seek to enhance the fabric of the towns and villages along the Wild Atlantic Way. At the moment, there is no Local Area Plans for the villages of Furbo, Spiddal, Inverin, Tully, Ballinahowan, Rosaveal, Casla or Carraroe which are a key section of the Wild Atlantic Way route in County Galway. Our client submits that a dedicated LAP should be prepared for Cois Fharraige (Furbo, Spiddal, Inverin, Tully and Ballinahowan) and a dedicated LAP should be prepared for the villages which surround Casla Bay (Rossaveal, Derrynea, Casla and Carraroe)

Summary

It is vital that a co-ordinated strategy for County Galway at national, regional and town level is prepared to ensure that the county can grow sustainably and secure investment as a key regional centre. As demonstrated under the NPF, it is vital to tailor 'policy approaches to capitalise on quality of life and sectoral strengths such as agri-food, energy, tourism and the marine, and to incentivise town and village renewal through the Rural Regeneration Fund.'

The RSES outlines that;

'The Northern and Western Regional Assembly has a leadership role to play in identifying regional policies and coordinating initiatives that support the delivery and implementation of national planning policy. It will also be the way the region organises for success in economic development – for the entire region – to shape a sustainably resilient place."

The RSES must bridge the gaps between the national and local policy, providing a tangible framework and allowing Galway to grow and proposer as a key regional centre. Following a review of the directors' report to make Material Amendments on the draft RSES it is noted that there are a number of positive amendments proposed to the draft RSES. However, it is imperative that the items listed above such as the R336 Upgrade, Rossaveal Port, Waste Water Infrastructure in the Gaeltacht, the



Marine Spatial Planning Framework and better long term planning in the form of dedicated LAPs for villages located on the Wild Atlantic Way are all included within the Material Amendments to the Draft RSES. This will ensure that the North West Region can unlock its potential by facilitating and managing growth "in a sustainable manner to the benefit of the entire region and country." (Draft NWRA)

Our client Ronan Barrett looks forward to his continued engagement in the RSES process.

Yours sincerely,



Ella O'Brien Graduate Planner MKO



Schedule of Waste Water Treatment Plants owned by Údarás na Gaeltachta and associated maps

Plant Address

Gaillimh

Na Forbacha 1, Coismeigmór, Na Forbacha Na Forbacha 2, Coismeigmór, Na Forbacha

An Coilleach, Spidéal Baile an tSagairt Páirc na Meán, Spidéal Coill Rua, Indreabhán Na hAille, Indreabhán

An Tuillaigh, Baile na hAbhann Baile an tSléibhe, Ros an Mhíl Doire an Fhéich, Casla

Ros an Mhíl

Tir an Fhia, Leitir Mór - Domestic

Cill Chiaráin Corr na Mona

Cárna

Plant Type

Single Basin plant Puraflo System

1 SBR plant with 2 aeration basins Large Extended Aeration Plant 1 Rotating Biological Contactor 1 SBR plant with 2 aeration basins

1 package plant

1 Bord na Mona Puraflo system

1 package plant 1 Single Basin plant

1 Extended Aeration Plant

2 SBR plants

1 Single basin plant 1 package plant

1 Bord na Mona Purafio system

Dún na Gall

Fanaid Na Dúnaibh An Tearmann An Fál Carrach Gort a Choirce

Machaire Rabhartaigh

An Bunbeag An Clóchan Liath Baile Na Fínne

Baile Na Móna, Cill Cartha

Mechanical Aeration Unit Mechanical Aeration Unit Pump/ Peat Module Mechanical Aeration Unit Pump/Peat Module

Envirocare 2nd ary. Wwater Tr

Municipal primary/ secondary & tertiary treatn

Mechanical Aeration Unit
Pump Peat Module

Biological activated sludge/SBR System

Chorcaí

Na Millíní, Baile Mhic Íre. Co. Chorcaí

Aeration and removal of solids

Licenced Discharge	Treatment Standard	Discharge Licence	Annual Capital Cost 2018
25m3/day	Co Co. na Gaillimhe	W.10/78	
Not known	Co Co. na Gaillimhe	W.296/95	
27m3/day	Co Co. na Gaillimhe	W.17/78	
454m3/day	Co Co. na Gaillimhe	W.9/78	
not known	Co Co. na Gaillimhe	S/74/02	
50m3/day	Co Co. na Gaillimhe	W.185/98	
6m3/day	Co Co. na Gaillimhe	License application in process	
not known	Co Co. na Gaillimhe	new plant proposed	92,286
9m3/day	Co Co. na Gaillimhe	W.134/86	-,
25m3/day	Co Co. na Gaillimhe	License application in process	
700m3/day	Co Co. na Gaillimhe	W.182/88	
40m3/day	Co Co. na Gaillimhe	W.164/88	
Not known	Co Co. na Gaillimhe	W.179/88	
5m3/day	Co Co. na Gaillimhe	W.174/88	
Not known	Co Co. na Gaillimhe	Requires License	
<1m3/day	20/20	No Licence	n/a
<2m3/day	20/20	No Licence	n/a
<4m3/day	20/20	No Licence	n/a
<4m3day	20/20	No Licence	n/a
n/a	20/20	No Licence	n/a
<3m3/day	20/30	No Licence	N/A
300m3/day	16/25	Lwat35 Donegal CoC	n/a
n/a	20/20	No Licence	n/a
< 2m3/day	20/20	No Licence	n/a
100m3/day	20/40	Lwat71 Donegal CoC	n/a
Not Known	Comhairle Chontae Chorcaí	WP(S)4/87	n/a

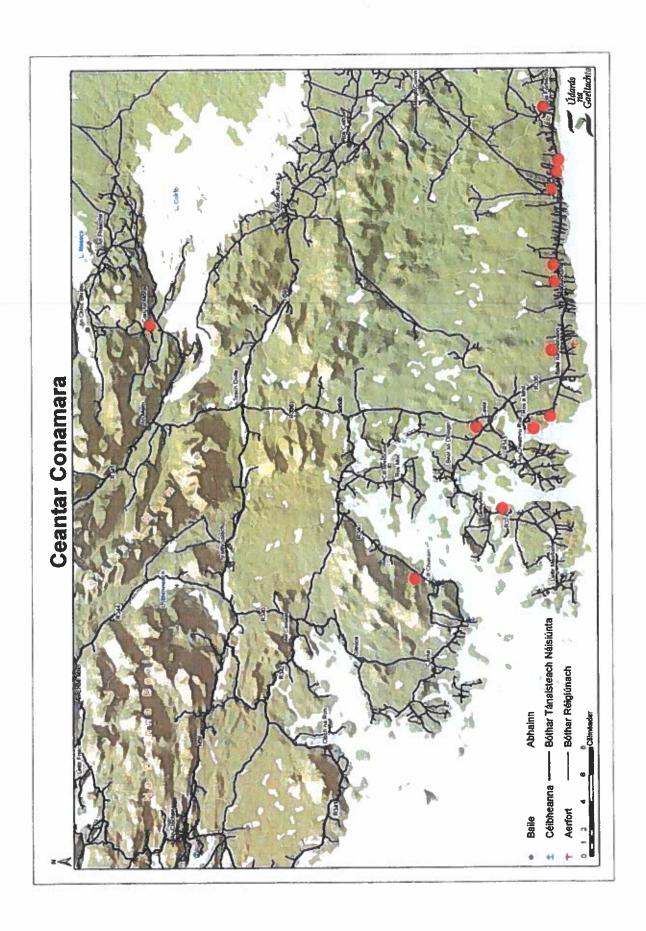
Annual Maintenance Cost 2018

8,058.32

6,529.82
34,714.66
11,712.07
17,905.71
6,968.84
65,685.62 Not functioning tankering to Ros an Mhíl
6,143.84
10,217.94
26,400.81
39,085.23
8,526.86
21,119.93

900.00
€3,056.66
€400 - est. electrical running cost
2,259.58
No cost - premises vacant
530.00
126,177.00
No cost - premises vacant
€500.00 est. Electrical running cost
88,498.00

€22,000



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