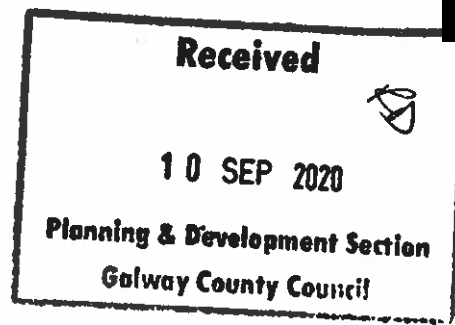


Administration Officer,
County Development Plan Review,
Forward Planning Policy Unit,
Galway County Council,
Áras an Chontae,
Prospect Hill,
Galway.

07 September 2020



**RE: SUBMISSION
COUNTY DEVELOPMENT PLAN 2015-2021 REVIEW
AND PREPARATION OF NEW COUNTY DEVELOPMENT PLAN 2022-2028**

Dear Sir/Madam,

I wish to make a submission as outlined above. In particular, I wish to refer to the section on page 9 of the Issues Paper CDP 2022-2028 titled "Core Strategy and Housing".

I refer specifically to Lackagh village, but I know the same issue exists in small settlement areas all over the county.

Lackagh Village is designated as a small settlement in the current CDP.

In the current CDP, it is stated policy in "Objective SS7- Development of Small Settlements" to facilitate development in such locations, while giving consideration to connectivity, capacity, good design, community gain and proper planning and sustainable development.

On the basis of the above and in an effort to meet the demand for high quality affordable housing in the area, I on behalf of myself and my fellow co-owners lodged a planning application for a modest residential development (24 residential units) under planning reference no. 19/248. The development site is within the designated settlement of Lackagh as categorised under section 2.6.7. of the County Development Plan 2015-2021. Previously planning permission had been granted on part of these lands for 13 residential units on 15/05/2006. However, this development never proceeded because of the economic recession and the collapse of the housing market.

Planning was refused under PI. Ref. No. 19/248 by An Bord Pleanála on 11/09/2019, **for the single reason that the existing communal wastewater treatment plant would not adequately service the proposed development.** Galway County Council had previously

granted permission for the treatment plant to cater for all existing and proposed future development under planning ref. 17/1546.

The decision under 19/248 was appealed to ABP following a refusal by Galway Co. Council for the stated reason of the **absence of a public sewerage scheme, the provision of a developer-provided treatment plant and the location of part of the development on the outer edge of the village of Lackagh.**

I have highlighted the above permissions to outline how the provisions of the existing CDP are unachievable and totally meaningless.

The existing settlement hierarchy in the CDP identifies towns, villages and other smaller settlements for potential growth and has allocated population increases for same.

The vast majority of small settlements and many of the large villages have no public sewerage scheme. **Therefore, under current policy they will not be developed under any circumstances.** I understand planning is being granted on 0.5 acre sites with individual treatment plants within villages and settlement centres but this is not sustainable development.

In view of the current restrictions, the settlement hierarchy proposals in the CDP are meaningless and cannot be implemented. It is unlikely that government funding will be provided for sewerage infrastructure in the dozens of small settlement centres and villages in Co. Galway.

Therefore, the current policy should be altered to facilitate developer provided communal treatment plants.

In current urban developments in the larger urban centres, the water and sewerage infrastructure are being provided by developers, **under the strict supervision and control of Irish Water. Upon completion of the works, the infrastructure is handed over to Irish Water.** This system is working well, and I understand all the work is of the highest standard.

Surely this model can also be applied in villages and settlement centres. **Otherwise, there is no point in having a settlement hierarchy and policies for encouraging development within these centres within the CDP.**

Surely, the provision of sustainable residential development in villages and settlement centres is more preferable than undesirable one-off housing in the rural countryside.

Furthermore, the extent on the ground of villages and Settlement Centres should be clearly defined on maps, and this will end uncertainty and confusion over the current situation.

It is absurd having policies (including population allocation) in a new CDP that are not implementable.

CONCLUSIONS:

Incorporating proposals and strategies in a new CDP, which are not implementable, contravene the requirement of the Planning and Development Act 2000. I therefore recommend that both of the above recommendations be incorporated into the new CDP.

Yours Faithfully,

A solid black rectangular box redacting the signature of Maria L. Flynn.

Maria L. Flynn

Representative of the Flynn Family