



Your Ref: Review of Galway CDP 2015-2021 and preparation of new Galway CDP 2022-2028

(Please quote in all related correspondence)

10 September 2020

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Re: Review of Galway CDP 2015-2021 and preparation of new Galway CDP 2022-2028

A chara

I refer to correspondence to the Department of Culture, Heritage and the Gaeltacht on 18/06/2020 received in connection with the above.

Outlined below are heritage-related observations/recommendations co-ordinated by the Development Applications Unit under the stated heading(s).

Archaeology

With reference to the issues paper submitted for comment please it is recommended that the heritage section of the new Galway County Development Plan should include appropriate objectives to address climate change issues relating to the archaeological heritage.

The Department of Culture, Heritage and the Gaeltacht published the 'Built Heritage & Archaeological Heritage Climate Change Sectoral Adaptation Plan' (2019) prepared under the National Adaptation Framework. Link to online document at <https://www.chg.gov.ie/app/uploads/2019/10/ccsap-built-archaeological-heritage-final-main-report-low-res.pdf>.

It is recommended that the Council takes account of the objectives and recommendations in the plan when drafting the archaeological heritage section of the new Galway County Development Plan.



Architectural Heritage

Built Heritage Policy of the Department recommends that built heritage is considered as an integral part of the wider built environment and should be dealt with holistically throughout the development plan.

As part of raising awareness of the county's built heritage it is recommended an Architectural Conservation Officer (ACO) with expert skills and practical experience. The role of the ACO includes supporting the council in its stewardship of the county's rich architectural heritage legacy, guiding best practice in terms of the reuse and the adaptation of historic buildings to climate change, supporting the implementation of national grant schemes such as the Department's Built Heritage Capital Grant Schemes, the Historic Towns Initiative and the Irish Walled Towns Network, supporting the securing of urban regeneration funding and collaborating on major infrastructural projects such as transport and flood relief works.

A number of policy documents pertaining to built heritage and archaeology are under consultation or complete, including Heritage Ireland 2030, the Climate Change Sectoral Adaptation Plan for the Built and Archaeological Heritage and the National Policy on Architecture. These documents position built heritage as a central and integrated theme in government policy. We welcome the policies and objectives of these core documents being inserted into future development plans.

The recent Programme for Government 2020 has provided a focus to historic urban centres – cities, towns and villages, as the opportunity to consider cultural heritage as the capital for societal well-being, innovation and for social cohesion. The COVID-19 lockdown has demonstrated the importance of culture heritage during the pandemic for supporting well-being in communities. In the wider context the built environment is the setting for our lives, our work and recreation. Built and archaeological heritage provide the structure and form of our historic cities towns and places, the cultural layers have evolved and continue to develop over time. Consideration for the maintenance, repair, remaking, adaptation and conservation of these finite resources should be holistically stitched into all development policies and objectives.

The renewal of Local Authority development plans is timely in terms of the global climate change challenges and presents opportunities for the potential of built heritage to be fully considered in county development plans as a central theme. Implementing policy, raising awareness and providing guidance to owners of historic buildings on issues such as thermal upgrading and building repair requires in-house expertise to provide coherent and coordinated advice. A key recommendation is the appointment of staff such as Conservation Architect, Archaeologist and Heritage Officer to guide and inform owners.

There are a number of areas that the Department consider require greater attention and focus in future development plan objectives and policies:



Climate Change – heritage resilience and sustainability, consideration of appropriate measures to ensure the long term survival of historic structures, their uses and their contribution to the sense of place.

Town revitalisation - enhanced policies for heritage-led urban regeneration based on an understanding of their cultural layering/transmission of cultural significance/high quality adaptation, reuse and renewal of historic fabric and remaking of historic places.

National Inventory of Architectural Heritage – use building survey and garden survey to inform policy and planning.

Vernacular Architecture - address the incremental damage and cultural loss of settlements and their settings due to the lack of awareness, vacancy and demolition.

National Policy on Architecture – Places for people. 5 themes to be embedded in the future development plan policies to ensure the delivery of and implementation of government's policy, including the Local Authorities role in ensuring the delivery of high quality architecture and quality place making for everyone and in demonstrating best practice in the care and maintenance of historic properties in its ownership.

Heritage Ireland 2030 – 3 strands to be embedded with the importance of communication, digital opportunities and community engagement as part of the delivery of built heritage policies.

Flood Relief works – attenuation, upgrading and repair of existing infrastructure, high quality design of new infrastructure and coordination with public realm/recreational amenity in urban centres.

Tall buildings in historic urban centres – mitigation of negative impact on historic character areas and urban landscape in relation to large ground scrappers as well as tall buildings through the consideration of design criteria and guidance to safeguard the historic built heritage context.

The following themes are recommended for inclusion along with objectives and policies that accord with the conservation of the County's Built Heritage.

Local Authority Climate Change Strategy

As part of the National Adaptation Framework, DCHG has published a *Climate Change Sectoral Adaptation Plan for the Built and Archaeological Heritage* (2018). The Department is engaged with the Climate Action Regional Offices (CAROs) through our Climate Change Advisory Group to ensure a consistent approach to protection and adaptation of heritage across the country. The Department anticipates ongoing engagement with the CAROs throughout the implementation of our sectoral plan.



While the architectural heritage of this country has survived well in the past, changing climatic conditions may make it less able to cope. Climate change can alter and accelerate decay or can overwhelm the capacity of older structures to deal with severe weather events, increased extremes of wetting and drying, or cold or heat. There is also a significant threat to architectural heritage from climate action posed by maladaptation, that is, poor quality or ill-advised adaptation works leading to damage to heritage, whether directly or indirectly.

In the preparation of the local authority adaptation strategies, there are a number of issues regarding protection of architectural heritage that the Department recommends should be taken into account to identify the architectural heritage at risk in its area, to assess its vulnerability to climate change and develop disaster risk reduction policies for direct and indirect risks. For example, we recommend the strategy should undertake to:

Identify the architectural heritage in the local authority area that may be under threat, directly or indirectly, due to climate change. This should include, but not necessarily be restricted to, the protected structures and architectural conservation areas designated in the local authority Development Plan. It is noted that due to the COVID-19 lockdown of urban centres that many town buildings have been left vacant and inaccessible and many will not re-open. Buildings that are left with poorly performing rainwater goods, and roof coverings will be very vulnerable in inclement weather.

Include objectives to carry out climate change risk assessments for the historic structures and sites in the local authority's functional area particularly those in the authority's own remit.

Include objectives to develop disaster risk reduction policies addressing direct and indirect risks to the architectural heritage in its area.

Include objectives to develop resilience and adaptation strategies for the architectural heritage in its area.

Develop the skills capacity within the local authority to address adaptation / mitigation / emergency management issues affecting historic structures and sites in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works.

The Department recommends that, where such officers are employed, the architectural conservation officer and/or heritage officer should be included on the local authority's Adaptation Steering Group.



The revitalisation of Historic Urban Centre – cities, towns and villages

The Department is a key stakeholder in promoting the revitalisation of historic urban centres and has had a central role in the development of innovative policy, guidance on best practice in the reuse of existing buildings and the development of high quality public realm, concepts which have been supported through annual funding programme for towns and their building fabric. In support of the vision of the National Development Plan, the Department is developing a National Policy on Architecture (NPA), under several themes, all of which are applicable to the future sustainable development of town centres i.e. research strategies required to inform planning and development, heritage-led regeneration and climate change adaptation and the design of high quality places for people. During the consultation phase of the NPA, the Department, has received many significant contributions and presentations - the Collaborative Town Health Check Programme (CTHCP) demonstrated its strategic importance to informing future town management policy by providing the point of engagement with a business community, the compilation of baseline data for assessing and visualising the well-being, quality and economic vitality of a town centre and allowing comparison to be made with European counterparts on the significance of the current vacancy rates presenting in Irish towns, pre COVID-19 lockdown.

As Ireland emerges from lockdown society we have never been more aware of our surroundings and the benefit that a quality built environment brings to our lives. Whilst areas of disadvantage and constraints of urban living have been highlighted during the lockdown, Government has acknowledged the need to provide economic stimulus to assist society in its recovery. The EU is similarly providing support to Member States with policies and funding being aligned to deliver the upgrade existing building stock as an integral part of climate change adaptation, town revitalisation and economic prosperity. The Department's built heritage grant schemes have been revised to tackle climate change resilience and to gather information to inform future funding strategies and practices for towns. The Architectural Conservation Officer has a key role in the implementation of such schemes, communicating their benefit, developing best practice and supporting traditional skills to retain the local character.

Acknowledging that a greater percentage of inhabitants now live in urban centres than the countryside, urban centres provide the opportunity to focus on the challenges and opportunities that climate change adaptation and the re-purposing of our extant building stock will bring. Historic building refurbishments and conversions in small settlements and rural areas have helped to accommodate new uses, facilitating rural economic diversification. Historic areas often provide the focus for leisure facilities, from theatres and art installations to restaurants and bars. Historic buildings, areas and waterways can serve as catalysts for the repopulation of inner-city areas and development of new and sometimes more specialised housing, retail and leisure markets.



Programmes such as the CTHCP health check surveys provide the imperative to the Local Authority as well as the basis to become more attentive of the well-being of towns as providing an understand of the opportunity to focus through a single lens and to ascertain the benefit of interconnecting government policies and funding to greater effect and benefit of rural society. The adoption of governance tools within Local Authorities such as the Health Check Programme and Conservation Plans for special sites, and their respective setting up of one-stop –shops to promote and coordinate the planning and building regulatory aspects of urban regeneration is regarded as a positive and proactive means to enabling built heritage to be reused and adapted successfully, It is a planning model that may be applied to the various scale of urban settlement as necessary.

Policy

To consider concepts of historic urban landscapes as a collection of buildings at the various scales of settlement, the origins of Irish cities, towns and villages which give rise to their special characteristics. These include setting, topography and natural features. The conservation and reuse of early traditional structures, roofscapes of historic centres and the recognition of interrelationships between sites and landscape features in terms of the insertion of new buildings and managing their impact on the historic environment.

To consider a *Town Centre First Approach* which puts town centres at the heart of decision making to revitalise historic urban centres. To appoint a Local Authority multi-disciplinary team which communicates the historical and architectural context, focuses on the repair and upgrade of existing historic buildings, and guides new use adaptation with regard to architectural character and significance.

To promote the development of heritage-led regeneration, to plan for the reuse and conservation of core built heritage and archaeological sites within urban centres as an integral part of the evolution of the historic place and its significance.

To promote best conservation practice and to lead by example through the management and safe-guarding of historic properties in the ownership of the Local Authority.

To support the development of sustainable infill to the town back lands that is appropriate in scale and character to that of the historic centre, that transitions and accommodates surviving structures and retains the historic streetscape form particularly within sensitive areas of built and archaeological importance. To ensure strategic housing development supports rather than detracts from the vitality and overall character of historic town centres in terms of scale, connection and mobility strategies.

To compile core data information about the built and archaeological evolution of historic places, i.e. to monitor condition and vacancy to inform future development strategies and progress.

To coordinate significant infrastructural projects such as public realm works, flood relief works or new transport routes and alternative modes of transport to the benefit of surviving



historic sites in order to improve their enjoyment, presentation and enhanced accessibility. We note in this regard the removal of traffic from urban centres and the resulting improvement in air quality which has been exemplified by the recent COVID-19 lockdown and the perceived enjoyment of urban living. These transitions support a return to sustainable and attractive urban living.

The National Inventory of Architectural Heritage (NIAH) – Building Survey

Under Section 53 of the Planning and Development Acts 2000-2012, the Minister for Culture, Heritage and the Gaeltacht may make recommendations to a planning authority concerning the inclusion of particular structures, specific parts of particular structures, or specific features within the attendant grounds of particular structures for inclusion in local authority Records of Protected Structures. Local authorities must have regard to such recommendations, where they relate to structures recorded by the National Inventory of Architectural Heritage (NIAH) and rated as being of International, National or Regional significance. In development planning, any proposals for development must take account of the possible impact on the historic interest of these structures. If the Council, after considering a recommendation made by the Minister, decides not to add the structure to the RPS, it must inform the Minister in writing of the reason for its decision. The Minister has recommended sites for inclusion in the Record of Protected Structures and to date, the Council has included a number of sites as Protected Structures in their own right and as part of Architectural Conservation Areas. The structures that are not formally protected benefit from a form of protection through Section 53(2) of the legislation, which allows the planning authority to have regard to the Minister's recommendations where a building is subject to a planning application.

The purpose of the NIAH is to identify, record and evaluate the post-1700 architectural heritage of Ireland, uniformly and consistently, as an aid in the protection and conservation of the built heritage. A key part of the work of the NIAH is to raise awareness of the richness of the architectural heritage and in this regard, the NIAH maintains a website, www.buildingsofireland.ie, that features all structures recommended by the Minister, in descriptive, photographic and map form. This website is also a useful link to a range of other material, including information about grants, and downloadable publications relating to practical buildings conservation. The NIAH has produced illustrated books for all counties and cities, constituting short introductions to the architectural heritage.

While the NIAH has carried out surveys for all counties, such surveys are representative rather than comprehensive. It is envisaged that all counties will be updated over time, with further ministerial recommendations for inclusion in the Record of Protected Structures.

Policy

To consider the inclusion of all structures identified by the NIAH and recommended by the Minister for Culture, Heritage and the Gaeltacht in the Council's Record of Protected Structures.



To consider that all such structures be regarded as ‘Candidate Protected Structures’, pending verification by the Council and inclusion in the Record of Protected Structures. To direct users of relevant local authority services to the information resources of the NIAH website www.buildingsofireland.ie.

NIAH – Garden Survey

The NIAH has compiled a record of significant historic designed landscapes, demesnes and gardens throughout the country. The objective is to begin a process of understanding and appreciating the extent of this rich heritage. The county boasts a significant number of such places and some are accessible to the general public. These places may be private gardens, public parks or landscapes associated with country estates and demesnes.

The Council recognizes the contribution that these planned landscapes make to the appearance of the countryside, and their significance as a source of information about history and society in the county. These places also hold significant resources for biodiversity because of their wide range of habitats, whether open grassland, water courses and open water, woods and copses, and old buildings and walls. Our designed landscapes, demesnes and gardens provide havens for an enormous variety of animal and plant species and, through careful enhancement and rehabilitation, these can offer significant potential for enhancing biodiversity more generally. Importantly, such places are also helping to mitigate the effects of climate change. Where such places are open to the public, they offer tremendous opportunities in terms of mental and physical health and wellbeing through being in close contact with nature.

Since medieval times, demesnes were lands retained by a lord for his own use and occupation, with associated gardens and places for food provision, such as orchards, pigeon houses, rabbit warrens and fishponds, adjacent to the principal residence. Over time, demesnes were developed to include ‘naturalistic’ parkland, woodlands and additional buildings, such as gate lodges and follies.

These historic designed landscapes, demesnes and gardens may not be in the Record of Protected Structures *per se*, although various constituent elements may be included. Elements of such places include: the demesne house and outbuildings, gates and boundary walls, avenues, walled gardens and pleasure gardens/landscapes, glasshouses and orangeries, icehouses, pigeon-houses, bridges and follies, private chapels, graveyards and mausolea, canals, lakes and duck and fishponds, rabbit warrens, tree-rings, copses, coverts and plantations; also associated features built by the owners of these places (such as workers’ houses, schools, etc.).

These habitats contain collections of plants and specimen trees that may be of national or international botanical importance and interest. They may also be of significant historical



and aesthetic interest, or illustrate aspects of the development of gardening and of gardens and parks, providing insights into changes in society over time.

Cork County Council has produced a document, *Guidance Notes for the Appraisal of Historic Gardens, Demesnes, Estates and their Settings* that is an attractive guide for understanding designed landscapes and, in the case of development proposals, facilitating the preparation of appraisals of historic gardens and designed landscapes and possible impacts on their heritage value.

<https://www.corkcoco.ie/sites/default/files/2017-04/Guidance%20Notes%20for%20Appraisal.pdf>

Policies

To identify significant historic designed landscapes, demesnes and gardens for protection under the development plan.

To designate Architectural Conservation Areas, where considered appropriate, in order to preserve the character of historic designed landscapes, demesnes and gardens.

To identify and protect significant views to or from such places.

To encourage the compilation of Conservation Plans for the long term conservation and management of cultural landscapes and their components in the ownership of the Local Authority/State.

To cooperate with the National Inventory of Architectural Heritage in assessing and celebrating historic designed landscapes, demesnes and gardens.

To encourage and facilitate the retention and careful maintenance of these places and the various components set out in the introduction above.

To encourage the cataloguing of plant collections, trees and habitats within these places to appropriate national standards.

To encourage the cataloguing of fauna within these places to appropriate national standards.

To protect and promote heritage and traditional varieties of plants and trees within our historic designed landscapes, demesnes and gardens.

To promote public awareness, enjoyment of and access to these sites and to seek the cooperation and assistance of other interested parties, including Government Departments and state agencies, in this regard.



To preserve and protect the biodiversity of these places and, where appropriate, to encourage the enhancement of the range of plant and animal species, in order to add to local, regional and national biodiversity.

To promote conservation, renewal and improvement that enhances the character and setting of historic designed landscapes, demesnes and gardens and of former examples of such places, and to resist proposals or developments that would lead to the loss of, or cause harm to the character, principal components, or setting of these places.

To require a detailed appraisal of the potential impacts of any development proposed for within or adjacent to these places, or that might affect its setting. A methodology for preparing such an appraisal can be found in the *Guidance Notes for the Appraisals of Historic Gardens, Demesnes, Estates and their Settings* (Cork County Council, 2005). Applicants for proposed large-scale developments within historic designed landscapes, demesnes and gardens may be required to produce 3D Digital Survey Modelling to demonstrate that the proposed development does not adversely affect the site or its setting.

To have regard to *Guidance Notes for the Appraisal of Historic Gardens, Demesnes, Estates and their Settings* (2006) published by Cork County Council (<https://www.corkcoco.ie/sites/default/files/2017-04/Guidance%20Notes%20for%20Appraisal.pdf>) and to the *Architecture Heritage Protection Guidelines* (2011) published by DCHG (<https://www.buildingsofireland.ie/app/uploads/2019/10/Architectural-Heritage-Protection-Guidelines-for-Planning-Authorities-2011.pdf>) in the appraisal and description of historic designed landscapes, demesnes and gardens.

Vernacular Architecture

Vernacular architecture is rooted in our traditions and accumulated wisdom and encapsulates our identity. It is characteristic of local communities and environments. Many vernacular houses and farmyards are maintained with pride by their owners, while contributing to the aesthetic appearance of the landscape, with benefits for wellbeing, tourism and the local economy. Importantly, our vernacular architecture also contributes to the world's cultural diversity.

The majority of surviving vernacular buildings, date from the eighteenth and nineteenth centuries, although older examples are also known; the majority of unnamed buildings on the early Ordnance Survey maps are vernacular. Due to the spread of urban centres previous stand-alone structures may have merged with the urban conglomeration and awareness of their importance is diminished. Houses are commonly small and single-storey, but may be lofted, and there are two-storey examples; all have relatively low wall-head and door heights and small, irregularly-placed windows; and many have corrugated-iron roofs (perhaps over thatch). The interiors of such houses, particularly the old kitchen



and hearth, are essential to their character. Other building types include the most numerous, farm buildings, but also include, for example, settlements and groupings of farmyards, small-scale industrial items (e.g. limekilns, mills, culm crushers), field systems and lazy-beds, some piers/quays, boat pens, field paths, mass houses, holy wells (and similar features) and stones and other natural features with traditional associations.

Vernacular buildings were constructed by the occupants, users and neighbours and thus no two can be exactly alike. This characteristic extends to house internal layouts, walling and roofing materials, farmyard forms, and even whole settlements. The vernacular tradition differs greatly from formal architectural design, this latter being created by professional builders and designers, influenced by imported styles, and includes most high-status dwellings, public buildings and even social housing.

Vernacular buildings, through their siting, orientation and materials, display an intimate connection with their landscape. Natural materials, including field or quarried stone, mud and sometimes local brick for walls; wattles for hearth canopies and partitions; straw, reed and other vegetable materials and stone flag or slate for roofs and floors; and timber from the bog or hedgerow are all distinctively local. Corrugated iron, despite its origins, has become part of the vernacular palette. Vernacular building crafts also have a local or regional character, and the work of the blacksmith, for example, is evident in hearth cranes, farm equipment and gates.

Vernacular materials and methods are most appropriate for the repair of vernacular buildings, but also offer potential for new work. Vernacular buildings are inherently good in terms of energy efficiency, with openings placed to maximise light but minimise heat loss, and thick walls that retain heat and gradually release it, and absorb moisture and release it easily, allowing them to 'breathe'. Some modern practices and products, such as use of impermeable materials and making spaces too airtight, can be harmful and simpler, low-tech solutions are almost always better.

Vernacular settlements survive in many counties, usually as farming or fishing hamlets and comprise small groups of houses and yards arranged in a deceptively haphazard manner. They frequently have an attractive visual character and atmosphere and some may have medieval origins.

Thatch covers some older (and some recent) buildings, but now often survives better under corrugated iron. Loss of historic thatch layers and roof structures also represents a loss for agricultural and botanical heritage. Regular maintenance is essential and costs can be considerable, although there is a thatching grant available from the Department of Housing, and the local authority, the Department and Heritage Council might also provide financial assistance under their grant schemes.

Our stock of vernacular architecture has diminished alarmingly in recent decades, with many buildings neglected or replaced, due to changing aspirations and demands. Viable



new uses and careful rehabilitation can contribute to sustainable development and encourage social and economic regeneration. The *Government Policy on Architecture 2009–2015* encourages the sustainable reuse of the existing building stock, whether or not such buildings have protected status, and this is particularly pertinent to vernacular architecture.

Policies and objectives in relation to Vernacular In high-level introduction to development plan

Recognize that vernacular buildings are characteristic of our local communities and environments and contribute to their authenticity, and to their cultural, traditional, architectural, archaeological, historical and social interest and diversity. Promote the appropriate rehabilitation, revitalization and reuse of vernacular buildings, wherever feasible, employing best conservation practice and using traditional, especially vernacular, building methods and materials.

Rural housing/settlement policy

Proposals for sensitive rehabilitation of disused vernacular houses will not be subject to the Rural Settlement Strategy for housing in the countryside that applies to new dwellings, assuming that their vernacular character is not compromised, that their fabric is repaired using appropriate techniques and materials, and that the structure was previously a dwelling. Where a building is derelict, measures should be taken to support and protect the building from collapse prior to and during works.

There will be a presumption against the demolition of vernacular buildings where restoration or adaptation is a feasible option.

To consider the uniqueness of vernacular buildings and ensembles in terms of their focused and specific relationship with their immediate environment as a model and guide for the development of modern design approaches in rural and other appropriate settings.

Climate change and sustainability/energy efficiency

To recognise the inherent sustainability of vernacular buildings by virtue of their use of natural and renewal materials of local origin.

To ensure the continued sensitive and appropriate rehabilitation and reuse of vernacular buildings in the interest of sustainability.

To ensure the conservation and reuse of traditional materials in the interest of sustainability, good conservation practice and maintaining the long-term viability of such buildings and their associated features.

The retention and careful rehabilitation of historic buildings in our landscapes, including vernacular houses and other structures, whether urban or rural, allows the materials and embedded energy of these structures to be harnessed for present and future generations.



Removal and replacement of such buildings represents a waste of their embedded energy and such proposals should be subject to rigorous scrutiny.

Where permission is sought to demolish a vernacular building on the grounds of structural defects or failure, or that it is not reasonably capable of being made structurally sound, such a contention must be convincingly demonstrated through a detailed report on the existing condition produced by a professional with appropriate conservation expertise and, preferably, an understanding of vernacular buildings. As part of such justification, details will be required of remedial works normally used in similar circumstances and setting out why these would not be appropriate.

Where a building has been destroyed by fire or accident, the Council may consider demolition to be appropriate, but a report by a professional with appropriate conservation expertise, specifying the cause and extent of damage, will be required. As a minimum, a vernacular building proposed for demolition should be fully recorded to an agreed professional standard. If a disused vernacular house is demolished or replaced with a replica, the Rural Settlement Strategy will apply.

Ensure that measures to upgrade the energy efficiency of vernacular buildings acknowledge their inherent vernacular characteristics, techniques and materials and do not have a detrimental physical or visual impact.

Promote and support appropriate and well-informed energy efficiency upgrades to vernacular buildings through the dissemination of factual and relevant information to the general public.

Rural development/farm diversification/tourism

Encourage and facilitate the sensitive reuse of vernacular houses or farm buildings for farm diversification, agritourism and rural development, including self-catering accommodation, arts or craft workshops and small-scale manufacturing. Guidance and information can be found in *Traditional Buildings for Irish Farms* (2005) published by the Heritage Council and Teagasc, and *Reusing Farm Buildings: A Kildare Perspective* (2006) published by Kildare County Council.

Architectural heritage/conservation

To protect, maintain and enhance the established character and setting of vernacular buildings, farmyards and settlements.

Development proposals affecting vernacular buildings will be required to be accompanied by a detailed measured survey, photographic record and written report carried out by a professional with appropriate conservation expertise and, preferably, an understanding of vernacular buildings. Early consultation with the planning authority is strongly advised.



Facilitate appropriate, high-quality design solutions for adaptations of vernacular buildings that carefully consider their vernacular qualities in terms of design, scale, setting and finishes. While new design can be expressed in contemporary architectural language, consideration should be given to exploring the use of appropriate vernacular features, building techniques and materials.

Where it is proposed to extend a vernacular house, the design, scale, footprint and materials should be sympathetic to the existing building and its setting. Extensions should generally be located to the rear and not obscure the form or layout of the existing building; substantial removal of walling is not generally recommended; connecting the existing building and extension should minimize the number of new openings and ideally use existing openings; sometimes, an outbuilding contiguous to a dwelling can be successfully incorporated.

Promote the protection and maintenance of the character and setting of vernacular buildings, farmyards and settlements, including historic gateways, boundaries and other features.

Ensure that developments proposed within or adjacent to vernacular settlements respect and enhance their spatial character, building forms, features, details and materials. Promote the protection and maintenance of thatched buildings (domestic or non-domestic), particularly those with historic layers and roof structures.

To maintain an up-to-date record of thatched buildings, promote available grant schemes and facilitate engagement with owners in the maintenance of these buildings.

Rural settlement/architectural conservation

Consider the protection of vernacular settlements by means of Architectural Conservation Area designation, promote the reuse of disused or unoccupied buildings within them, and ensure that developments proposed within or adjacent to vernacular settlements respect and enhance their spatial character, building forms, features, details and materials.

New National Policy on Architecture

The proposed new National Policy on Architecture, currently being drafted, will support high quality architecture which respects our collective cultural identity and past traditions of building settlement. The policy is an opportunity for the local authority to create the conditions for a high quality, low carbon and more resilient built environment for future generations. The policy will focus on five key themes – designing for climate resilience and sustainability; designing quality spaces for public benefit; respecting our past, shaping our future; leadership; knowledge and innovation – and BHP recommends that the five themes are included in the objectives and policies of the development plan to ensure the delivery and implementation of the policy.



Heritage Ireland 2030

Heritage Ireland 2030 is a new National Heritage Plan which will set out key principles and policies for conserving and managing Ireland's heritage over the next decade and more. The Plan is currently being finalised with a view to publication later this year.

Heritage Ireland 2030 will embrace and support existing policies and initiatives. It will provide further policy backing for the mitigation of climate-change impacts and the protection of biodiversity. It will build connections between related initiatives and ensure coherence in delivering its vision.

Heritage Ireland 2030 will also provide a bridge between our tangible built and natural heritage and our intangible heritage – our language and cultural traditions in their diversity – ensuring that important aspects of our identity do not lose their connection to the landscape and people from which they have evolved.

Heritage Ireland 2030 will strengthen many aspects of our powerfully diverse heritage. The strategy's delivery structures will allow all bodies which protect and manage Ireland's diverse heritage to engage constructively with each other, with other public authorities and with communities, enterprise and NGOs. Heritage Ireland 2030 will be delivered with community engagement and involvement, with leadership and through cooperation and partnership. It will build stronger heritage partnerships, allowing all stakeholders to work together to better ensure its protection.

Heritage Ireland 2030 is formed around three themes: 1. Communities and Heritage 2. Leadership and Heritage 3. Heritage Partnerships and should be embedded in the LA Development Plan.

Nature Conservation

The Department welcomes the invitation to make a submission in relation to the Issues Paper/ pre-draft stage of the Galway County Development Plan 2022-2028. The following observations are made by the Department in its role as a statutory authority with overarching responsibility for nature conservation and the nature directives (i.e. the Birds and Habitats Directives). The observations are not exhaustive but are intended to assist the planning authority in meeting its obligations in relation to nature conservation, European sites, biodiversity and environmental protection in the process of reviewing and preparing the County Development Plan 2022-2028 for County Galway, hereafter referred to as the Plan. The Department welcomes the opportunity for early engagement in this process and to provide observations at the 'Issues Paper' stage of the review process.

It should be noted that the Department made a submission on the 17/07/2020 to Galway County Council regarding the SEA scoping for preparation of the new County Development



Plan (DAU ref GE-GE-A200623-0025 and Council Ref. FP2020/023) which should be read in conjunction with this submission.

The Department's observations will focus on specific environmental issues for Galway and refer to national policies with regard to natural heritage and biodiversity so that biodiversity and its connectivity in the county can be strengthened to become a robust and functioning asset that is of benefit to all.

1. Government policy on nature conservation

Government policy on nature conservation is clearly set out in the National Biodiversity Action Plan 2017-2021 (NBAP), which has the clear objective to "*mainstream biodiversity into decision making*", for all public authorities and to move towards no net loss of biodiversity. It also requires Local Authorities to develop policies and objectives for the protection and restoration of biodiversity. It is crucial that consideration is given to coherent protection and enhancement of biodiversity at a regional as well as local level.

National policies that recognise the importance of incorporating biodiversity protection and nature conservation into land use plans at an early stage are namely; The National Planning Framework (NPF) 2018, Northern and Western Regional Assembly Regional Spatial and Economic Strategy 2020-32, National Biodiversity Action Plan 2017-2021, All Ireland Pollinator Plan 2015 -2020 and the National Peatlands Strategy 2015. As a signatory to the United Nations (UN) Convention on Biological Diversity Strategic Plan for Biodiversity 2011-2020, Ireland's policies are reflected in a vision where "*biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits essential for all sectors of society and that Ireland contributes to efforts to halt the loss of biodiversity and the degradation of ecosystems in the EU and globally.*"

All of these policies, and strategies contain explicit commitments to sustainable development, no net loss of biodiversity and a low carbon society. They also emphasise the importance of taking an integrated approach to understanding the role the environment and natural landscape plays in the quality of life indices, water quality, economic prosperity, food production, recreational opportunities, tourism visitors, sense of place, and the overall distinctiveness and differentiation of localities. Moreover, these plans recognise that our natural resources are non-renewable and that we must protect them first, and then seek to leverage them sustainably. These principles should be evident throughout the Plan.

Biodiversity is under threat at a global, national and local scale, Ireland's 6th National Report to the Convention on Biological Diversity¹ has identified that the rate of progress is not sufficient to halt the loss of biological diversity. Biodiversity in Ireland is impacted by habitat loss, changes in land use, pollution and climate change. This legacy of loss and

¹ <https://www.npws.ie/news/ireland%E2%80%99s-6th-national-report-un-convention-biological-diversity-released>



damage is addressed in the NBAP by ensuring in its objectives that conservation in the wider countryside and marine environment is addressed by expanding and improving the management of protected areas and species, by strengthening the knowledge base, raising public awareness, and mainstreaming biodiversity actions with the cooperation of other Government Departments and Agencies.

The Covid-19 pandemic has also highlighted the value of biodiversity in relation to our physical and mental wellbeing. Biodiversity also has an essential role in providing the ecosystem services in particular for soil productivity, pollination, pest predation, water retention, clean water provision and the maintenance of commercial fisheries. There is therefore an urgent need to protect our natural resources for present and future generations. A County Development Plan (CDP) that has biodiversity embedded in its core policies will help build a county that is a healthy place for its people and visitors, and provide fully functioning and resilient ecosystems.

2. Nature Conservation within the Plan

While it is important that the plan sets out the legislative requirements in relation to the protection of designated sites and protected species under both European (i.e. Birds and Habitats Directive) and national legislation (i.e. Wildlife Act 1976-2018), the plan should also ensure that legislative requirements and Government policy on biodiversity generally can be delivered. Objective 1 in the NBAP is to “*Mainstream biodiversity into decision-making across all sectors*”. There are real opportunities to protect and enhance biodiversity when considered early in any development proposal and in particular at a strategic level during the plan-making process. Biodiversity considerations should be integrated into all aspects of the Plan. It is also important when biodiversity measures are incorporated into development proposals that the measures are appropriate to the particular situation and they can be sustained long term (i.e. evidence based solutions to biodiversity protection and enhancement). The Department encourages the use of Environmental Sensitivity Mapping² during the preparation of the Plan and the use of the ‘Ecosystem Services Scoring’ approach; to avoid impacts on Natura 2000 sites and nature conservation interests generally. In particular the Plan should avoid policies and objectives that undermine or are in direct conflict with natural heritage policies and objectives and should seek to provide a net gain for biodiversity wherever possible.

The review of the existing Plan’s policies and objectives should take place with a view to streamlining and strengthening objectives and ensuring that they are consistent with current EU and national legislation and Government policy relating to biodiversity.

The Department recommends that there is an overarching commitment in the Plan to undertake Appropriate Assessment (AA), EIA and Ecological Impact Assessment (EclA) as required and appropriate in relation to all downstream plans and projects. Objectives in relation to AA, EIA and related matters should be clear and concise.

² <https://airomaps.geohive.ie/ESM/>



3. Natural Heritage

The Department notes the Council's existing strong commitment to biodiversity protection in the current Galway County Development Plan 2014-2020, and it is hoped that this focus on biodiversity protection will be strengthened when reviewing the natural heritage objectives as part of the plan review process. The Department would like to commend the council on their achievements to date and acknowledges the positive initiatives of Galway County Council Heritage Office and the Local Authority Waters Programme (LAWPRO). Countywide initiatives such as 'People and Nature' - The Galway County Biodiversity Project website provides an on-line portal to showcase the numerous biodiversity events and opportunities in the county, highlighting the numerous projects that are underway in the county. Local initiatives such as the heritage audit at Creggs, information panels on biodiversity at Aughrim River, pollinator initiatives at Corry's field in Loughrea and information panels and pollinator friendly management at Rinville Park all highlight community involvement in Council led programmes and initiatives developing local knowledge and pride in the natural environment. Other biodiversity projects such as publication of the 'Hedgerows of County Galway' provide important resources available for reference for public and Council staff. Other schemes such as 'Green Flags for Parks' provide opportunities for local council staff to network with other Councils and exchange information on environmentally sensitive and sustainable site management. The Council should build on this work and seek to strengthen biodiversity protection within the Plan area and its zone of influence.

The county has a rich and varied natural heritage which requires protection and conservation. This natural heritage not only has an intrinsic value but also an economic value in terms of the ecological services provided and in terms of tourism and production of high quality agricultural produce. The variety of habitats and species in County Galway is extensive and contributes to the identity and sense of place for a community (eg. Blanket bog in Connemara, Turloughs in South Galway, Raised Bog in East Galway, Callows and Freshwater Pearl Mussel in Oughterard, Curlew on Lough Corrib, Lesser Horseshoe Bats in Cong, Hen Harrier in the Slieve Aughty Mountains and Corncrake on Inishbofin).

The Department recommends that natural heritage objectives are clear and robust, and include objectives to protect, conserve and enhance biodiversity both within and outside protected sites. This is critical in ensuring that the Council meets its obligations in relation to nature conservation and biodiversity. Where development projects arising from the plan are not subject to the legal requirements to prepare either an Environmental Impact Assessment Report (EIAR) or Natura Impact Statement (NIS) the impacts to biodiversity will best be facilitated through the preparation of an Ecological Impact Assessment (EclA), and the Department recommends including this as an objective in the Plan. Species or habitat specific surveys (e.g hedgerow, bat



roost, nest searches) may also be considered appropriate to inform a development proposal. Surveys carried out for the preparation of EIAR, NIS, EclA or other survey results generate biodiversity data previously unknown or unrecorded in a county, and the Department would encourage the council to include an objective requiring these data to be submitted to the National Biodiversity Data Centre (NDBC). This would strengthen the county's knowledge base on biodiversity and ultimately aid its protection.

4. Threats, Pressures and Other Considerations for Nature Conservation

Galway contains numerous habitats and species of international and national importance both within and outside designated sites. The most recent Article 17 report³ and Article 12 Report⁴ under the Habitats and Birds Directives, respectively, have shown that even with strict protection these habitats and species are continuing to deteriorate or decline. The Department notes that Galway County Council is fully committed to the protection of the designated sites across the county but the Department notes additional pressures on biodiversity which have occurred during the lifetime of the 2014-2020 plan.

In addition, clear and robust objectives are required in respect of species subject to strict protection, such as otter and all bat species, under Regulation 51 of the European Communities (Birds and Natural Habitats) Regulations, 2011. In relation to these species strict protection applies wherever they occur. The loss of trees and hedgerows can, in general, impact on bat species and other wildlife and affect the connectivity of hedgerows as wildlife corridors. Bat roosts can also be affected where there is redevelopment of old buildings (e.g. from the loss of these available roost sites). A specific objective should be included in the Plan requiring that surveys for these strictly protected species and other species protected under the Wildlife Acts, are included in all development and maintenance proposals (e.g road maintenance) where there is a reasonable likelihood of these species being present and affected by the development.

4.1 Drainage of Peatlands

The Department would like to highlight the importance of peatland habitats within County Galway and that development proposals on designated and non-designated peatlands may be subject to the requirements of the planning code, the Environmental Impact Assessment Directive, (including EIA screening requirements where applicable), and the requirements of the Habitats Directive (including the need for screening for AA and AA), as appropriate. The Department recommends a strong and clear policy objective in the draft development plan in relation to peat extraction to ensure clarity in relation to the requirements for planning permission provided for in the Planning and Development Act, 2000 (as amended) and the Planning and Development Regulations, 2001 (as amended) and environmental

³ <https://www.npws.ie/publications/article-17-reports/article-17-reports-2019>

⁴ <https://www.npws.ie/status-and-trends-ireland%E2%80%99s-bird-species-%E2%80%93-article-12-reporting>



assessment in this regard. It is recommended that the draft plan include an objective to support the implementation of the National Raised Bog Special Areas of Conservation Management Plan 2017-2022; and the restoration measures currently underway and proposed to protect and enhance raised bog habitats. The Living Bog EU LIFE project has facilitated restoration measures at 12 raised bog SAC throughout Ireland. Carrownagappul Bog in east Galway is included in the project thus contributing to halting and reducing carbon loss in the County and enhancing peatlands nationally.

4.2 Water Quality

The continued intensification of farming especially the increase in the dairy herd and increased fertilizer application has led to significant and ecological impacts such as eutrophication of waterbodies and drainage of wetlands.

Waste water also continues to be a primary threat to water quality due to deficiencies in waste water treatment, including in some instances the continued release of raw sewage (e.g Spiddal and Carraroe). One-off housing with pollution from septic tanks also impacts water quality. In formulating the Development Plan the Council needs to ensure that increased wastewater discharges and increased demands on water supply due to population growth do not lead to a further deterioration in water quality with consequent impacts to biodiversity including impacts to Natura 2000 sites. The Plan should also address current deficiencies in waste water treatment systems in the County.

The Local Authorities Water Programme (LAWPRO) works to implement to Western River Basin Management Plan. The EU Water Framework Directive (2000/60/EC) requires all Member States to protect and improve water quality in all waters to achieve good ecological status by 2015 or, at the latest, by 2027. LAWPRO has been successful in maintaining focus on Galway's water quality and prioritising areas for action in order to improve water quality. Support of LAWPRO and the works required for areas for action should be policy in the Plan.

4.3 Lighting

The Department recommends that 'Lighting' objectives are included within the plan both for town and rural areas where incorrect types or inappropriate use of LEDs can have an impact on bat species and other wildlife. The Department would like to highlight the EUROBATS⁵ and Dark Sky lighting recommendations⁶ which provide further information on reducing the impact of lighting on wildlife, noting that the correct LEDs and lighting fittings can ensure that these impacts are avoided or minimised and can also reduce carbon emissions.

⁵ EUROBATS Series No. 8 publication, Guidelines for consideration of bats in lighting projects, 2018

⁶ Dark Sky Ireland Lighting Recommendations, 2019



4.4 Invasive Alien Species (IAS)

The Department would also like to highlight the threat of Invasive Alien Species (IAS) as one of the key pressures which increase biodiversity loss in Ireland. The spread of *Rhododendron ponticum* on peatlands, most notably in Connemara, is one such example. The control of IAS is a target of the NBAP. The Department recommends that specific objectives in relation to the containment and control of IAS in the context of development proposals is included in the plan which reference to the EC (Birds and Natural Habitats) Regulations, 2011.

4.5 Tourism, Recreation and Coastal Squeeze

Galway has a rich and varied coastline with many dramatic seascapes. Coastal habitats and functioning ecosystems are also crucial in coastal protection. Coastal squeeze describes the impact on coastal habitats from the combined pressures of climate change at sea and human activities on land. Climate change is predicted to cause sea level rise and increased frequency and intensity of storms, which in turn will lead to greater frequency of coastal flooding and erosion events, and eventually to landward movement of coastlines and coastal habitats. In recent years the focus on coastal areas for transport, tourism and recreation infrastructure has increased. The success of the Wild Atlantic Way has led to a number of associated ecological impacts which are of concern to the Department and has put increasing pressure on ecologically sensitive locations often within Natura 2000 and other protected sites. Together, these factors threaten to reduce the area available for coastal habitats and impair their natural function.

Impacts can be a consequence of activities such as increased vehicle traffic, trampling and 'wild' camping. The increase of outdoor recreational pursuits has put added pressure on habitats and increases disturbance to many species particularly bird species in Special Protected Areas (SPAs). Continued development in order to improve access to areas with high ecological sensitivity can be problematic in terms of conflict with the conservation objectives of the sites. It is important that the Plan recognises the potential for tourism and recreation related proposals to impact such sites, and to ensure that these issues are addressed in both the Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) for the Plan. This will ensure that robust objectives are in place to ensure the protection of habitats and species within Natura 2000 and other protected sites.

Plan objectives that underpin Sustainable / Green Tourism with the intention to focus promotion on Ireland's 'Hidden Heartlands' would be welcomed where the focus is on areas that have the capacity to develop additional visitor number, especially in terms of small-scale initiatives (e.g Eagle Watches in Portumna and Portumna Forest Park). In order to control disturbance to protected species, the Department also recommends that the Plan includes policy to regulate activities of power propelled vehicles for recreational purposes that launch from council property within designated sites (SAC, SPA, NHAs and Wildfowl Reserves). Furthermore, cumulative and in combination effects are particularly



important in the assessment of effects to water catchments and their dependant species and the Plan should make it clear that these need to be accounted for in the environmental and ecological assessment of plans and projects.

4.6 Renewable energy

Notwithstanding the national drive to develop climate change resilience and renewable energy capacity the Department recommends that the Plan acknowledges that the citing of wind energy and other renewable developments in upland areas and renewable energy opportunities off-shore may be subject to significant environmental constraints.

4.7 Unauthorised developments

It is also important that the Plan provides for unauthorised developments to be addressed in a comprehensive manner to ensure that such development does not impact biodiversity in the county, including impacts to sites designated by law. The Plan should have a clear objective to ensure that the planning enforcement system works effectively and to ensure that sites are restored as required.

4.8 Improving and developing ecological expertise

The issues raised above highlight the importance of the availability of ecological knowledge and expertise to the Council. The Department would welcome the inclusion of an objective in the plan to strengthen the availability of ecological expertise across the Council's Departments so that the value of the County's rich biodiversity resource is fully integrated in all the work of the Council and to ensure that threats and pressures to biodiversity are addressed and managed effectively.

4.9 No net loss of biodiversity

A primary commitment in the NBAP is to move towards no net loss of biodiversity through strategies, planning, mitigation measures, appropriate offsetting and/or investment in Blue-Green Infrastructure.

It is imperative that the integrated environmental assessments in relation to the Plan review, including Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA), apply the precautionary principal to ensure there is no further deterioration of habitats and species both within and outside designated across the county and in its zone of influence.



5. Ecological Opportunities

5.1 Green infrastructure, Ecological Corridors and Landscape

The incorporation of Green Infrastructure (GI) in spatial planning is one of the ways in which the National Biodiversity Action Plan seeks to address the main drivers of biodiversity loss in Ireland by protecting and enhancing nature and natural processes and at the same time benefitting society through protection of ecosystem services. The Department welcomes the proposed Galway GI Strategy as set out in the 'Issues Paper' and notes that it should be developed in parallel with the review of the Galway Landscape Character Assessment. The GI Strategy should include provisions to encourage the management of features of the landscape which are of major importance to wild fauna and flora and it should be viewed at a large-scale (e.g. at a catchment level).

The 'Issues Paper' in relation to the Plan supports the National Planning Framework in relation to compact growth in larger urban centres particularly for the metropolitan area of Galway the Department would advise that the promotion of GI should be integrated into these developments with a commitment to reverse the loss of green urban ecosystems.

The value of naturally occurring wetlands and their hydrological processes needs to be recognised in the context of GI and how they can empower a community in climate resilience, enhanced water quality and floodwater retention – moving away from the traditional use of grey infrastructure and the dredging and canalisation of river systems and instead looking to 'slow the flow'.

GI and ecological corridors also provide important links in the connectivity of Natura 2000 sites and other protected sites (e.g. Natural Heritage Areas) in the County providing an opportunity to provide a cohesive network of protected sites. It is crucial that the importance of this cohesion is recognized in the planning system so as to prevent the fragmentation and isolation of protected sites resulting from ribbon development and 'one off' housing. Consideration should be given in all planning decisions to the importance of GI and of ecological corridors and how habitats such as hedgerows and wetlands can be included and / or managed appropriately. Application of the EclA may be appropriate in these instances.

The ecological importance of linear features in the landscape, such as hedgerows, need also to be recognised and embedded in Council roads maintenance programmes as well as the planning system, so that sensitive and ecologically appropriate management is carried out that does not compromise the ecological integrity of the landscape. This is imperative in terms of maintaining ecological connectivity and also in ensuring that our national commitment under Article 10 of the Habitats Directive⁷ is realised. The Department recommends that an objective for roads and transportation is included that all

⁷ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31992L0043&from=EN>



road maintenance and development shall have environmental quality measure that includes ecological integrity and no net biodiversity loss.

5.2 Greenways and Cycleways

A clear distinction should be made between Green Infrastructure and Greenways, Blueways and Peatways within the plan. As advised in the National Greenway Strategy, greenways and other associated linear trails should be designed to take into account, and avoid where necessary, the sensitivities of natural heritage. Greenway development can present threats and pressures to biodiversity through removal of vegetation during trail development, damage during trail maintenance, inappropriate (e.g. herbicide application) or lack of management, and inappropriate replanting schemes. The Department recommends that such proposals are subject to route/site selection processes to ensure that impacts to biodiversity and nature conservation interests are avoided. The Department also notes the need to apply the precautionary principle when screening for Appropriate Assessment (AA) and/or undertaking AA for Greenways, Blueways and Peatways.

Greenways and cycle routes, such as the proposed Connemara Greenway and Dublin to Clifden cycle route, can have the potential to act as multi-functional green infrastructure accomplishing both ecological and recreational objectives through informed design to re-enforce their nature conservation role and by recognising the features along them such as hedgerows, grass / wildflower verges, wetlands and bridges which are an integral landscape features of a Greenway corridor. The potential for greenways to maintain and restore hedgerows is an example as a novel planning mechanism for enhancing green infrastructure. There is also potential for collaborative projects with other state landowners (e.g Bord na Mona in East Galway) with a potential for habitat creation alongside Peatways.

5.3 Development of public buildings and Council owned lands

The Department would welcome the inclusion of a policy where all public buildings within the county incorporate positive biodiversity measures as standard practice. Actions can include simple measures, e.g. all new public buildings incorporate nesting boxes for swifts and/or bat boxes, the creation of wildlife habitats on public open spaces, to more ambitious measures that will ensure 'biodiversity net gain' on public development schemes. Furthermore, there is an opportunity for Galway County Council to enhance biodiversity by including policy objectives, for example, to map the extent of hedgerows in the county using the ecosystems scoring approach to identify gaps in these corridors and include a pollinator plan for the county with particular attention to roadside verges, roundabouts and council lands.



5.4 Agriculture and Forestry

Substantial areas of Galway particularly in the west of the county can be classified as high nature value farmland (HNV)⁸ and there are a number of innovative pilot agri-environmental schemes in Galway that aim to develop farming initiatives that support this ecological value and diversity. The whole-farm landscape approach of the Pearl Mussel Project which is operational in two Co. Galway catchments, along with the Hen Harrier Project and Caomhnu Arann and North Connemara European Innovation Partnership (EIP), provide payments for ecological value on the farm. This Results Based Payments (RBAPS) approach provides the farmer with flexibility and incentivises farmer-led environmental improvements. These schemes should be supported through Council initiatives with regard to marketing opportunities to showcase the breadth of environmental services being delivered by many farmers in Co. Galway. The success of these projects and the agri-environmental benefits also hinge on the protection and enhancement of ecological corridors in the county by the planning system including planning enforcement to address instances of unauthorized development.

The development of native woodland schemes is also welcomed. However low species diversity, poor woodland design and unsustainable management practices in forestry development has resulted in negative impacts on biodiversity and nature conservation in the county. Forestry development needs to be more focussed on species diversity and on the increased use of native species. Woodland schemes that support the planting of native trees should be supported. The Department recommends that the proposed Landscape Character Assessment review includes dedicated sections on the capacity of nature conservation interests and biodiversity to absorb conifer afforestation.

5.5 Climate change and Flood Alleviation

An objective of the Department's Biodiversity Climate Change Sectoral Adaptation Plan-2019, is a requirement to *"Protect, restore and enhance biodiversity to increase the resilience of natural and human systems to climate change"*.

Climate change adaptation is an opportunity to realise increased nature conservation protection throughout the county. As highlighted already this can be achieved through the recognition of the role of natural features in supporting key ecological processes via the GI concept. However, the Department takes this opportunity to highlight that flood protection and alleviation works must be subject to environmental assessment. It is therefore important that the Plan should provide for flood protection measures to be delivered in a planned and strategic manner subject to environmental assessment. The Plan should also acknowledge that climate change mitigation and adaptation actions can, at times, conflict with nature conservation interests and due consideration to environmental constraints should be given in all such cases.

⁸<http://www.high-nature-value-farmland.ie/hnv-distribution/>



6. Monitoring the impacts of the plan on biodiversity

Monitoring during plan implementation should allow for corrective action and intervention if environmental damage is noted and it will provide a learning opportunity for practitioners and decision makers for future land use plans. Monitoring can use existing sources of information including data collected by other government departments or agencies but the loss or enhancement of biodiversity due to development can only be adequately monitored and recorded through the planning process.

The Department would welcome a clear and specific monitoring plan to be included with the Strategic Environmental Report that would clearly outline how it is proposed to record the impacts of plan implementation on biodiversity, both in terms of biodiversity loss and biodiversity enhancement during the lifetime of the plan. The Department would also welcome the publishing of such reports.

7. Concluding remarks

It is important to note that these observations are not exhaustive, and are made without prejudice to any recommendation that may be made by this Department in the future. The Department would welcome the opportunity to discuss any of the matters raised here if this would assist the planning authority in the process of preparing the County Development Plan.

You are requested to send further communications to this Department's Development Applications Unit (DAU) at manager.dau@chg.gov.ie (team monitored); if this is not possible, correspondence may alternatively be sent to:

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