



Forward Planning Section
Galway County Council
Áras an Chontae
Planning Department
Prospect Hill
Galway

via portal: <http://consult.galway.ie>

3 July 2023

RE: DRAFT ATHENRY LOCAL AREA PLAN 23-29 (ALAP)

A Chara,

I refer to your notification on 25 May 2023 of the Draft Athenry Local Area Plan 2023-2029 (ALAP). The Northern and Western Regional Assembly ('the Assembly') wish to thank you for the opportunity to make this submission.

The Northern and Western Regional Assembly ('The Assembly') is not a prescribed body for LAPs and would not normally provide a submission on a town plan of this size. However, Athenry is described in the Regional Spatial and Economic Strategy ('RSES') as a town with regional potential (along with Westport, Carickmacross and Virginia) it was therefore considered worthwhile to provide this submission. The status of Athenry in the RSES is reflected in the Galway County Development Plan.

Description of the Plan

The ALAP comprises three parts, Part 1 is the written statement, Part 2 is the zoning Maps and part 3 is the Local Transport Plan (LTP). There are five companion documents including Transport Modelling Assessment, Natura Impact Report, SEA Report, Strategic Flood Risk Assessment, and an Appropriate Assessment Screening. The written statement and the LTP are concise readable documents. The overall suite of documents contains a vast array of information, and it would be a challenge to navigate and interrogate them for an ordinary member of the public. The structure of the LAP is similar to the Tuam LAP and brings a high level of consistency to the plan-making regime in Galway. The ALAP moves from the strategic position of Athenry in the context of the NPF and the RSES to the detailed local considerations which make up the majority of the plan. The written statement follows the strategic with a profile of the town and land use zones. It provides short accounts of existing and proposed land uses. It describes two opportunity sites and finally outlines the policy objectives which will inform development decisions in the area.

Format of Submission

This submission will examine the ALAP in the context of its consistency with relevant objectives in

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the RSES. The RSES references the benefits of promoting the potential of Athenry as part of an industrial corridor from Oranmore to Athenry. The RSES also describes a case study on innovation and includes the Bia Innovator Campus near Athenry as an example.

Issues and Consideration

The ALAP references the Plan Hierarchy and demonstrates the position of Athenry in the hierarchy. It makes particular references to RPO S3.1, which deals with compact growth and RPO 3.13, which references small and medium towns. It also described the pivotal position of Athenry, in terms of rail infrastructure in the region, being at the junction of the Western Rail Corridor and the Dublin to Galway line. It makes specific reference to RPO 6.11-13, which deals with improvements to rail infrastructure. There is a high level of consistency in the strategic intentions of the development of the town.

In completing its 2 year report, the Assembly did not examine any settlements below key towns. The ALAP outlines population growth, targeting an increase of 30% on the 2016 population by 2028. This is extremely ambitious and outstrips the 30% figure by 2040 for key towns in the RSES. The Assembly has examined the preliminary figures from the 2022 census and estimate that the population increase in Athenry since 2016 was c. 5%. There are no references in the ALAP as to the low level of progress towards the 2028 figure or any ambition or expectation as to how the 30% figures can be achieved. The quantum of land zoned for residential use including R1, R2, Infill and Town Centre exceeds the amount needed to achieve the 30% growth figure. The R1 lands alone is more than enough to achieve the figure. The Assembly suggest that further consideration be given to making the expected rates of residential delivery align with the quantum of lands zoned. In this regard, the Assembly notes that the ALAP states that R2 lands are not generally developable and that R1 lands can be developed immediately.

The inclusion of infrastructure audits would be a useful addition to the written statement in the context of zoning and planning. The Assembly note that a significant jobs announcement for Athenry was made in May; it is expected that 1000 medtech jobs will be created. This in itself vindicates the designation of Athenry as a town with regional potential. In terms of compact development and the jobs-to-population ratio in the National Planning Framework (NPF), there is a reasonable expectation that the population of Athenry will grow by 1500 in response to the jobs announcement. In this context, it may be appropriate for the Council to consider ways it could stimulate and/or accelerate the low levels of residential delivery.

As part of the plan-making process, the Council could additionally identify R2 lands that are 'shovel-ready' and have advanced to pre-application or application stage and consider allowing them to be advanced subject to material planning considerations. The guiding principles of s4.4.3 of the Development Planning Guidelines may be helpful in this regard. This could be a plausible response to what could develop into a local housing crisis. There are policies in the draft plan that support such an approach - ASP 9 compact growth, ASP 10 Implementation and monitoring, ASP 21 active land management. The circumstances outlined above may allow the council to adopt a more radical response to planning for Athenry, subject to appropriate management controls. The designation of Athenry in the RSES and the GCDP means that such a course would not set a planning precedent for other similarly sized towns in the county.

The issue of sustainable mobility is an important part of the ALAP and it includes references to RPOS 6.26 – 32, which deal with LTP and active travel. There is a high level of consistency with the RSES in this area.

The Assembly has a few miscellaneous comments on some of the specific policies and objectives in the ALAP. ASP 10 refers to implementation and monitoring, which is welcomed, together with intentions to adjust to ensure alignment with policies in the hierarchy. ASP 12 discusses the preparation of Town Centre Management Plans and references 10 areas which it could examine. It may be possible to include some of these topics into the ALAP itself. The Assembly notes and supports the concept of Active Land Management in ASP 21.

Conclusion

There is a good to high level consistency in the ALAP with the relevant policy objectives in the RSES. The Assembly recommends the following:

1. Re-examination of the quantum of lands zoned for residential development, in the context of population growth and housing completions since 2016 and recent job announcements.
2. Consideration of the inclusion of infrastructure audits within the written statement in the context of zoning lands.

Finally, the Assembly wish to thank the Council for the opportunity given to engage in the process. If you have any queries in respect of the above, then do not hesitate to revert.

Mise le meas,



Denis Kelly
Director