



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

23 March 2023

via online portal

RE: DRAFT TUAM LOCAL AREA PLAN 23-23 (TLAP)

A Chara

I refer to your notification on 8 February 2023 of the Draft Tuam Local Area Plan 2023-2029. The Northern and Western Regional Assembly ('the Assembly') wish to thank you for the opportunity to make this submission.

Tuam is a Key Town in the Regional Spatial and Economic Strategy for the Northern and Western Region (RSES) and it also has an important designation in the Galway County Development Plan. The purpose of this submission is to comment upon the TLAP in the context of its consistency with relevant objectives in the RSES and with the ambitions and goals identified in Section 3.8 of the Strategy, as it relates to Tuam and the identified Key Future Priorities.

Issues and Considerations

The written statement comprises 48 pages - the final third of the document sets out the development objectives for the plan. This is a welcome addition to the planning process and gives all stakeholders a better informed indication as to how the town should and could develop in the medium term. One of the major disadvantages of preparing a plan at this time is the absence of up-to-date census information. The 2016 Census is the main reference document and data source informing many of the policies in the plan. This is a regular issue with plan making and, as the CSO will be releasing more data from the 2022 Census this year, it may be worthwhile for the Council to delay completion of the plan until more up to date demographic, commuting and employment data is available.

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The TLAP references the Plan hierarchy and outlines Tuam's position vis-à-vis the NPF, the RSES and the Galway County Development Plan. In referencing the RSES it mentions specifically RPSs 3.1, 2, 5 and the key Future Priorities in Section 3.8 of the Strategy. The RPOs deal with issues such as achieving population targets, compact growth and regeneration. They also mention 40% of new residential development to be delivered within the built up area and the promotion of green infrastructure.

There are many references to the Tuam Regeneration Masterplan, describing it as a strategic document that will transform the town; it contains an implementation and an action plan and a phasing plan related to funding. The Assembly suggests that the regeneration masterplan could become a companion document to the LAP and that its salient points be fully incorporated into the TLAP. The Assembly note the identification of opportunity sites within the town centre, the identification of preferred uses and consider this a positive element within the TLAP.

The population for Tuam has grown since 2016, with preliminary results from the 2022 Census based on EDs showing an increase of c. 900 persons. This is split 2:1 between the rural and urban ED (some of it outside plan area) and in that period, the vacancy rate has significantly reduced (approximately 50%) since 2016 - refer to the Regional Assembly's 2-year implementation report. The increase in population is a welcome development but it falls far short of the targets set in the GCDP and TLAP. Both of these are planning for an increase of 30% by 2028. The population targets in the RSES plan for a 30% increase by 2040. This appears to be a more realistic scenario. There is no indication in the TLAP as to how it is proposed to get back on track to achieve the ambitious targets, outside of business as usual. The Regional Assembly's 2-year implementation report indicates that, over the six years since 2021, on average 16 residential units/year were completed in Tuam.

The zoning of lands for residential use is split between R1, R2, existing Residential, and Town Centre Area. There is 30.3 Ha of R1 (greenfield) land zoned, which at 35 Units/Ha can deliver all housing required to achieve the population targets. There is a further 71Ha of R2 lands zoned - both figures are too high and are not considered realistic or achievable. The Assembly advise that the brownfield element of development be taken into account and the R1 and R2 quantum be reduced accordingly.

The Assembly note the Local Transport Plan (LTP) is an inherent part of the LAP and its contents are very informative. In the case of Tuam, there are RPOs (6.26-32) which support the preparation of LTP, their incorporation into LAPs, promotion of walking and cycling, provision of permeability and the prioritisation of walking and cycling in towns. There are also RPOs which promote the upgrading and reuse of the existing rail lines that go through Tuam (RPO 6.11 and 13).

The TLAP, as part of a comprehensive plan to introduce cycling infrastructure throughout the town, proposes to actively pursue the use of the rail corridor (possibly on a temporary basis) as a high quality active travel route.

The TLAP is consistent with both policy approaches in the RSES and it appears that if the railway is to be used in the future, this will be accepted land use.

The Assembly note the proposal on the Zoning Maps for the provision of a ring road to the east of Tuam. It would be useful if there were references and objectives to support its delivery in the body of the document. There is support for the proposal in the County Development Plan.

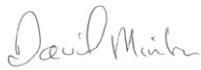
Recommendations

The Assembly make the following recommendations:

1. That population projection be aligned with RSES figures.
2. That the Regeneration Masterplan become an integral part of TLAP.
3. That timeframes be included for the delivery of the Eastern Ring Road.
4. That the quantum of lands zoned for residential takes account of
 - (a) The potential of existing lands and buildings to deliver some of the housing required
 - (b) The excessive amount of land within R2 zoning
 - (c) The potential to use and identify areas where densities other than 35 Units/Ha can be used.

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,



David Minton
Director