



26<sup>th</sup> July, 2021

**Galway County Council,  
Áras an Chontae,  
Planning Department,  
Prospect Hill,  
Galway.**

**RE: Draft Galway County Development Plan 2022 – 2028 (DGCDP)**

A Chara,

I refer to your notification on 20<sup>th</sup> May 2021 confirming that the Draft Galway County Development Plan 2022 – 2028 has been prepared and inviting submissions / observations. The Northern and Western Regional Assembly wish to thank you for notifying it of this.

The Regional Assembly is required under S27B of the Planning and Development Act 2000, as amended, to offer its opinion on whether or not the draft and its core strategy, in particular, is consistent with the RSES. The Regional Assembly is required to make recommendations to the council on any amendments necessary to ensure the Draft Plan is consistent with the RSES and to issue its report and recommendations and observations. The Members of the NWRA considered the report and recommendations and Observations at its Monthly Meeting on 16<sup>th</sup> July 2021. The submission will follow the chapters sequentially as set out in the Draft Plan and offers commentary on consistency on an ongoing basis, with Recommendations and Observations being provided at the end.

### **Chapter 1- Introduction**

Chapter 1 introduces the development plan process and links the draft to the NPF and the RSES. It summarises the draft and links the national strategic outcomes with the sustainable development goals of the UN. This is a common and consistent approach for the preparation of development goals. There is the mandatory section on how section 28 guidelines are examined in the draft and finally a short section on implementation and monitoring. There are no development objectives in chapter 1.

### **Chapter 2- Core strategy**

Chapter 2 is the core strategy, settlement strategy and housing strategy. This is the keystone of the draft and essentially most other chapters flow from this and this is probably the most important chapter in any development plan. The chapter provides the statutory background for the strategy. The chapter provides data on population trends over the censuses from 2011-2016. The proposed census for 2021 has been postponed until 2022 and relevant information arising from this is unlikely to be available before 2024. This situation is an issue for all councils and members are fully aware of this.

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The chapter examines a series of population growth scenarios, these are set out in table 2.5. The choice favoured in the draft is based on the higher end of the range in implementation roadmap for the NPF. This is similar to the approach followed in the RSES where only the mid-point of the range was displayed for convenience. The strategy at a macro-level can be deemed consistent with the RSES. The chapter comments then on household size and uses 2.5 as the accepted figure based on supposed convergence with the assumption in the NPF. The basis of the core strategy is inter alia to strengthen Galway through the settlement hierarchy flexibility in land uses, infrastructure capacity and environmental designation. These are recognised principles and accord with the NPF and RSES.

The core strategy table 2.9 sets out the targets for the plan period. The proposals sets very ambitious targets for the key towns i.e.30% increase by 2028, the RSES has a 30% target also but not until 2040. In this respect the core strategy is not consistent with the RSES. The strategy table proposes similar size targets for many other towns in the county such as Gort, Clifden, Loughrea, Athenry. The smaller villages have growth targets of 24%. This leaves less than 2% for growth in rural settlements and rural areas. The existing distribution in urban/ rural population is 22/78 and this has remained virtually unchanged since 2011. The population targets, up to 2018 allocates 83% to urban areas and 17% to rural. This is a departure from the distribution of development over this county. The figures will equate with just over 200 rural houses per year (including those in small villages) which will be significantly less in population terms than the mortality rates in Galway.

It is difficult to envisage how the scenario above can deliver balanced development at a county level and the Regional Assembly would have concerns that the core strategy is inconsistent with the RSES in two respects, the 30% targets for key towns by 2040 is not a feature of the draft and that it is also contrary to NS03 – to strengthen rural communities - and is inconsistent with RPO7.17 - to ensure that housing delivered meets the needs of communities in urban and rural areas.

The overarching policy objectives of the core strategy around compact growth, reduction of vacancy, brownfield development are consistent with RSES objectives RPO3.1. There is also an objective for implementation and monitoring but it has very little detail on it might be carried out, information on this aspect of the plan would be informative.

The chapter sets out the settlement hierarchy from the MASP at tier 1 to the open countryside at tier 7. The intervening tiers follow a rational sequence from key towns of Tuam and Ballinasloe to small villages. This is typical of hierarchies in other counties in the region. The issue of serviced sites is referenced in S2.4.11 and it appears to be conditional on a national program and the community providing sites. The RSES RPO 3.7 envisages the council taking the lead in such projects and this should be clarified and the terms of RPO 3.7 included in the draft. The next part of the chapter outlines the principles of the housing strategy and it is the intention of the council to provide or facilitate and increase housing through a number of mechanisms and makes provision for specialised housing including traveller accommodation. These policies SK1-4 are consistent with similar policies in the RSES RPO 7.16-7.20.



## Chapter 3- Placemaking, Regeneration and Urban Living

The strategic aims include town centre living, regeneration, mix of housing type of sizes and compact development. It also references inclusivity, health, well-being, vitality and design quality. The policies for placemaking and regeneration PM1-11 and CGR1-12 are consistent with similar policies in the RSES RPO 3.2, 3.4-3.6, 3.9 and 7.18-7.20. The policies on urban living U1-1-6 are also reflected in the draft. The Regional Assembly supports the specific designation of lands in development plans for nursing homes (RPO 7.14) and the council should be requested to do this in order to increase consistency.

The plan recognises that Compact Growth is a key component of the growth agenda in Ireland up to 2040 and that the level of residential density needs careful consideration to provide a balanced approach to achieve an appropriate level of density that responds to the characteristics of an individual area. In seeking to address these variations, it is proposed to undertake a Density Typology Study to inform a strategy for applying the appropriate level of density across the county. The Regional Assembly suggest that it may benefit the plan if further clarity be given on what a density typology study entails.

## Chapter 4- Rural Living and Development

The council recognise the importance of national policy with regard to strengthening rural communities (NS03). It also recognises the potential that may arise for rural areas from remote working. The draft also references the RSES support for development of rural areas in particular RPOS 3.4, 7, 8, 13. The balance in relation to different parts of the settlement hierarchy is quite stark when tier 7 is reached, there is less than 2% allocated for development in small settlements and open countryside as outlined previously. The mortality rates in the county mean that the population increase from new houses will be significantly less which means that the plan is preparing for systematic depopulation in many rural areas. The Regional Assembly consider this to be inconsistent with NS03 and RPO 7.17 which is to ensure that housing delivered meets the needs of the communities in urban and rural areas.

The chapter has policies for rural housing RC1-7 which accord with similar policies in the RSES to strengthen small towns and villages. The Regional Assembly suggest that the council consider inclusion of RPO 3.3 - 20% brownfield development in rural areas - as an addition to RH7 and a spatial prioritisation program for serviced sites as provided within RPO 3.7, in order to improve consistency.

The Regional Assembly note that Galway is described in the draft as one of the most rural counties in the country and the policy for the different rural area types are set out in policies RH1-5. It would be informative for the public if clarity were given as to what constitutes a demonstrable economic need for the many occupations (outside of agriculture) that are needed to service the over 130,000 people currently living in rural Galway. The chapter recognises the potential for small enterprises and the smart economy in rural Galway and this is consistent with policy in the RSES. It also has comparable

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policies for agriculture, agri-diversification and the bio-economy RD1 and RPO4.27. The chapter also supports forestry especially broadleaf this accords with similar supports in S5.9 of the RSES. The RSES has an RPO 5.24 to set up a regional forum for forestry and the council could consider support for this.

## Chapter 5- Economic Development

The draft identifies four game changers, Brexit, COVID-19, remote working and carbon emission targets. The strategic aims include core strategy, brownfield development, FDI, high quality construction, remote hubs and working from home. The balancing of employment and population growth NPO 1C at ratio of 0.66/1 should be referenced when assessing jobs forecast in section 5.5.1 even though a target of 0.7 is proposed. The rationale for selecting 30m<sup>2</sup>/employee would be informative. The Regional Assembly commends the council on its approach in directly linking population and employment.

The DGCDP supports the preparation of an economic development strategy for the county, the Regional Assembly suggest a timeline for its completion be given and that because of the MASP that it would be a joint venture with the city council – as is proposed for the Retail Strategy. In relation to the proposal for a strategic economic corridor from Oranmore to Attymon (2km each side of the railway) a prioritisation schedule of how infrastructure is to be provided should be part of the DGCDP (See also P 139 of RSES). The former Galway airport site is proposed to be developed as an employment hub, the Regional Assembly in RPO 3.6.6 proposes an integrated development intention for this site and developed lands (including associated lands) in its immediate hinterland (on both sides of the R339) and EL4 would not be consistent with this approach. The NWRA is disappointed that this has not been reflected appropriately and must be addressed.

The policies for sectoral employment opportunity SCO1-8 have similar regional policies e.g. RPO4.23-26 RPO4.38-4.42 and could be considered consistent with the RSES.

The chapter examines retail next and proposes a joint retail strategy with the city, a timeline for its delivery would better inform the public. The policies for retail RET1-3 and CS 1-8 are consistent with those in the RSES RPO 4.45-47.

## Chapter 6- Transport, Movement

The strategic aims are identified as support for Galway County Transport & Planning Strategy (GCTPS) and the Galway Transport Strategy (GTS), integrated development, sustainable transport, upgrade Galway Athlone Rail. The policy objectives for transport and planning GCTPS1-9 are consistent with the policies outlined in chapter 6 of the RSES including the preparation of Local Transport Plans (LTP) for Tuam and Ballinasloe, support for the Western Rail Corridor and the dual tracking between Galway City and Athlone . The policy objectives for walking and cycling WC1-WC5 are consistent with RSES policies for same RPO 6.23 and 6.26. The policies for public transport PT1-8 are also consistent with similar policies in the RSES, RPO 6.11, 12, 13 RPO 6.18-6.22. The inclusion of a policy on rail electrification would increase consistency.

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The policies PRP12 NR1-3 in relation to national roads are consistent with those in the RSES, RPO 6.5-6.6. The Regional Assembly suggest that timelines be given for roads projects to better inform the public and to aid monitoring and implementation.

The policies on airports AT1-3 and seaports PH1-5 are consistent with similar policies in the RSES RPO 6.1-4.

### **Chapter 7- Infrastructure, Utilities and Environmental Protection**

The strategic aims are to protect water resources, provide necessary infrastructure, support CURWMP, support broadband provision. These are at one with ambitions of the Regional Assembly. The chapter outlines the water and wastewater projects proposed by IW it would be informative if timelines were given to aid monitoring and implementation. The policies in this chapter WS1-8, OW1-3, WW1-9 are consistent with similar policies in the RSES RPO8.12 TO 8.23. The Regional Assembly note that in assessing the capacities of wastewater and water infrastructure the information given is quite limited and suggest that the detailed information in the SEAR for capacities is included in the written statement to better inform the public about headroom in various systems and their historic performances (refer table 3.4 in the SEAR for example).

The next part of the chapter examines waste management and references the CUWMP 2015-2021, it also promotes the circular economy principles of prevention, reuse etc. The policies for waste management WM1-9 are consistent with those in the RSES RPO8.8. The Regional Assembly suggest that some guidance be given on the spatial delivery of infrastructure and that RPO 8.10 be included in the DGCDP.

The next section in chapter 7 is electricity, the development objectives for this and gas are EG1-5. The policies are similar to those in the RSES RPO8.1 to 8.4 and 8.6 the Regional Assembly suggest that references be made to the relevant Galway projects in table 11 of the strategy in the draft in order to ensure consistency.

The next section in chapter 7 is telecommunications and it references support for the NBP and other objectives for telecommunications infrastructure. These are consistent with RSES policies in section 6.5. The chapter in completed with policies for air quality, noise, light pollution, soil quality and major accidents. There are no commensurate sections in the RSES.

### **Chapter 8- Tourism and Landscape**

The strategic aims are to maximize sustainable tourism for the purpose of balanced economic development, prepare a tourist strategy and VEDP, have regard for national tourism brands Wild Atlantic Way (WAW) and Irelands Hidden Heartlands (IHH). Collaboration is a strong feature of the tourism industry and this is reflected in the development objectives. The tourism sections in both the RSES and the DGCDP are comprehensive. There is a high level of consistency between the development objectives e.g. TOU 1,2 VEDP 1, 2, T1-4, GRW 1, 2, CTB1-5 and CT1-3 and objectives RPO 4.1-4.3, 4.45, 4.10-12, 4.15.

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The next section of chapter 8 examines landscape. The draft outlines the character of the area and their sensitivity and their influence on proposed developments. The Regional Assembly suggest that the council consider inclusion of RPO5.2 which encourages collaboration between neighbouring counties in landscape characterisation in order to achieve consistency with the RSES.

## **Chapter 9- Marine and Coastal Management**

The strategic aims are to promote growth in the marine sector, provide infrastructure, protect ecosystems and manage coastal flooding. The draft acknowledges the NMPF and the marine bill and has development objectives to protect the coastline visually and environmentally. These are reflected in objectives NMPF1, MCD1,2, MCE1. The DGCDP with SMTI and 2 supports infrastructure and development of ports and the development of aquaculture AF1, SF1,2. The Regional Assembly have a suite of similarly policies with RPO 4.31, 32, 34, 35 and 36. There is a high level of consistency between both documents.

The draft supports marine renewable energy MREI similar to RPO 4.33 and marine research and innovation is equally supported by both documents MRI,2 and RPO4.34.

## **Chapter 10- Natural Heritage, Biodiversity and G/B Infrastructure**

The strategic aims are to protect natural heritage and biodiversity and implement national plans. The chapter in turn examines protection of designated sites, RBMP, wetlands, peatlands, forestry, geology heritage, greenways and blueways. The draft has a series for development objectives for those purposes. These are consistent with the wide range of policies in the RSES including our overarching environmental policy objective in section 1.5 and the following RPOs 4.12, 14, 15 and 5.4, 5, 7, 22, 25.

## **Chapter 11- Community Development and Social Infrastructure**

The strategic aims in this chapter are the provision of leisure, recreational, amenity and cultural facilities, support social inclusion and accessibility. The chapter has policies with respect to support for social inclusion and community development SCI 1-5, SC1, 2 childcare facilities CF1-3, educational facilities EDU1-7.

These have corresponding policies objectives in the RSES RPO 7.2, 3, 6, 13. The Regional Assembly note that the provision of education facilities is linked to population growth (EDU2) which is sustainable, however inconsistency (with the RSES) in population growth for the Key Towns referred to earlier may lead to unintended consequences if not addressed. Notwithstanding, in order to increase consistency, the Regional Assembly recommend that lands for specific nursing home use be included as an objective (RPO7.14).

The next part of the chapter examines healthcare the development objectives H1-3 support provision of healthcare facilities and slainte care, these are consistent with RSES policies RPO 7.8-7.11. The next two sections reference older and younger people objectives PA1-5 and YP1-3, these are consistent with RPOs 7.12, 13.

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The next section deals with people with disabilities objectives PDU1-3 which is consistent with section 7.4 of the RSES and RPOs 7.12, 13.

The remaining parts of the chapter deal with emergency services and crime prevention which is not included in the RSES.

### **Chapter 12- Architectural Archaeology and Cultural Heritage**

The strategic aims are protection of archaeology area architecture (RPS, ACA) and to implement the heritage and biodiversity plan 2017-2022. The development objectives for architecture include AH1-4, archaeology ARC1-12, historic/ linguistic/ art CHH 1-5, CA1-4. These are consistent with the suite of regional objectives RPO 4.15, 5.16, 17, RPO 5.14, 15, RPO 5.8, 11.

### **Chapter 13- The Galway Gaeltacht and Islands**

The strategic aims are to provide an appropriate level of services and infrastructure, support language plans, preserve the language. The policy objectives include the protection of the languages, co-operation with Udaras throughout the Gaeltacht and support economic and tourist development in the islands, ref GA1-6, 1S1-4. These are consistent with the policies in the RSES in section 5.8 and RPO 3.13, 5.8, 5.11 and 5.12.

### **Chapter 14- Climate Change, Energy and Renewable Resources**

The strategic aims outlined include reduction in CO<sup>2</sup> emissions, reduction in flood risk and reduction in use of fossil fuels. The development objectives CC1-10 are an amalgam of the contribution of climate change to all the proceeding chapters as referred to above climate change featured as a separate topic throughout the document. This approach was a carbon copy of the Regional Assembly's approach and there is a high level of consistency.

### **Chapter 15- Development Management Standards**

This is a comprehensive schedule of the technical requirements for all types of development which will be helpful in making a planning application. There is no comparable section in the RSES.

## **Volume 2 DGCDP**

Volume 2 comprises three parts –

1. Plans for Urban Areas within the MASP Baile Chlair, Bearna, Oranmore, Garraun, Briarhill.
2. Settlement Plans for small growth towns
3. Settlement Plans for small growth Villages.

The bigger towns in the county will have LAPS done commencing in Q3/Q4 this year.

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## MASP Plans General

The five MASP area plans have common development objectives within which their own characteristics development potentials can be addressed. The Council propose to use the population projections proposed in the RSES and in this respect the plans are consistent with the RSES.

The Plans have options for 15 different land use zonings and there are 23 development objectives pertinent to these. There is also a detailed Land Use Zoning matrix which provides comprehensive guidance to prospective developers. The Regional Assembly as noted earlier suggests that clarity be given on Density Typology study. A building heights study will also inform development, this has yet to be completed. In the absence of these two ingredients so to speak it is difficult to have certainty around the quantum of land needed to meet the population and employment growth proposed. The Regional Assembly does not propose to comment on any specific land aside from those specifically referenced in the RSES - since there are no detailed proposals for lands in the Growth Towns or Growth Villages these will fall into this category.

## Baile Chláir

There are significant areas of the settlement subject to flooding, in the north, centre and south of the area. A good proportion of these lands have already been developed and lands immediately adjacent to the flooded areas are zoned for development (residential, business/enterprise). The Regional Assembly suggests that a justification test be included with the plan to assess the risks for adjoining lands due to existing development in the flood zones A and B.

It would also be informative if the capacity headroom and performance of the WWTP were specified in order to inform the public, along with the lands that are serviced within the development envelope. The Council propose the following as part of the sustainable development of the settlement.

- Transport and Urban Renewal Plan (lifetime of plan)
- N17 by-pass
- Pedestrian and cycle route.

There are no definite timeframes for the commencement or delivery of the projects and the inclusion of those would be informative and aid monitoring.

The Regional Assembly overall consider that the plan is consistent with the RSES.

## Bearna

The major development projects in Bearna comprise a new WWTP, an inner relief road, an amenity park, the use of sustainable travel and a feasibility study for a new marina.





The plan has a common border with the city and it would be informative if the neighbouring land uses were shown in order to demonstrate integration and compatibility. The amount of land zoned for different land uses could also be provided in order to inform the public on development intentions.

Similar to Baile Chláir there are no definite timeframes for the commencement of projects and the concerns outlined above also apply here. Notwithstanding the above the plan at a macro level is consistent with the RSES.

## Oranmore and Garraun

These areas are contiguous and it is more convenient and useful to deal with them together. The development of Garraun is dependent on the delivery of transport and water services infrastructure. There is an inherent uncertainty with respect to timelines for delivery of infrastructure and how realistic the targets for development are, thus arises. It would be useful if some clarification on timelines was included in the plan.

There has been a lot of work put into the urban design elements of Garraun and comparatively very little put into similar elements in Oranmore. It would bring a level of coherence if this could be addressed. It would also help coherence and integration if the existing land uses contiguous to the boundary with the city were included.

## Recommendations

1. That the population targets for the key towns of Tuam and Ballinasloe be revised to reflect the target in the RSES of a 30% increase by 2040, this will be equivalent to an approximate increase in Ballinasloe of 1,000 and in Tuam of 1,300.
2. That the allocation for housing in tier 7 be re-examined to reflect NSO 3 (strengthen rural communities) and RPO 7.17 to ensure that housing delivered meets the needs of communities in urban and rural areas.
3. That RC3 (provision of serviced sites) be reconsidered and that the contents of RPO 3.7 in terms of prioritisation and delivery be included in a revised objective.
4. That RPO 3.3 - 20% brownfield development in rural areas - be included as part of RH7 (chapter 4).
5. That EL4 be amended to make it consistent with RPO 3.7, development of the Airport Site and Associated lands (chapter 5).
6. That RPO 7.14 be included in the updated plan which requires the zoning of lands specifically for nursing homes (chapter 11)

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## Observations

1. Policy PT7 (To support the opening of the Western Rail Corridor route from Athenry, Tuam, Claremorris to Collooney as an option for passenger and cargo transportation) is consistent with the RSES and is welcomed by the NWRA. The Assembly note PT 8 which supports inclusion of Loughrea in the railway network and consider it a worthwhile addition to the WRC.
2. The plan would benefit from further clarification on what a Density Typology Study entails and a timeline for its delivery, refer CGR5 (section 3.6).
3. It would be of benefit to provide clarification as to what constitutes demonstrable economic need for the many rural occupations outside of agriculture (chapter 4).
4. The Regional Assembly would welcome consideration to be given to inclusion of a policy objective to contribute to a Regional Forum on Forestry (RPO 5.24).
5. Clarify the rationale for selecting 30m<sup>2</sup>/employee as a quantum for estimating floor space for employment (chapter 5).
6. It would benefit the plan to include a timeline for the preparation and completion of an economic development strategy (chapter 5).
7. The inclusion of timelines for the delivery of water services projects would be a welcome addition to the plan (chapter 7).
8. The provision of data for performance, capacity and headroom in WWTPs would be a welcome addition to the plan (chapter 7).
9. The Regional Assembly suggest that guidance be given on the siting of waste infrastructure, refer RPO 8.10 (chapter 7).
10. The Regional Assembly suggests that reference be made to Electricity Projects for Galway as set out in Table 11 of the RSES (chapter 7).
11. The plan would benefit from the areas of lands, for different land uses being provided in a schedule attached to zoning maps.

## Conclusion

The Regional Assembly is generally satisfied that the DGCDP is consistent with the policy objectives in the RSES, but some alterations are required for this to be achieved as referenced above. Members also directed that in making this submission that the importance of achieving consistency between the Draft Plan and the RSES be emphasised.

If you have any queries in respect of the above observations, then do not hesitate to revert.

Is mise le meas,

David Minton  
Director