



Senior Planner
Planning Department
City Hall
College Road
Galway
H91 X4K8

via email: devplan@galwaycity.ie

12 April 2022

RE: DRAFT GALWAY CITY DEVELOPMENT PLAN (DGCDP)

A Chara,

I refer to your notification on 28 January 2022 that the Draft Galway City Development Plan 2023 – 2029 has been prepared and inviting submissions / observations. The Northern and Western Regional Assembly ('the Assembly') wish to thank you for this notification.

The 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 Regional Spatial and Economic Strategy (RSES) and its objectives. 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, recommendations and observations. The Members of the NWRA considered the report, recommendations and observations at its Monthly Meeting on 25 March 2022. This 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.

Consideration of Draft Plan

There are 3 volumes to the draft plan: Volume 1 Written Statement, Volume 2 Maps and Volume 3 Environmental Reports.

The Assembly acknowledges that it takes a multi-disciplinary team to prepare and publish a statutory plan and in the case of Galway City, the plan has a consistent approach to dealing with various subjects. It has regard to the existing planning hierarchy, and this is demonstrated in each Chapter. The plan and accompanying documents comprises nearly 1,000 pages of information and includes the documents referred to above and a HNDA and a Density and Building Heights Study. The latter document gives a thorough description of the city and provides a rationale as to how the city can develop visually. This is consistent with RPO 3.6.3 and the Assembly commends the Council

on its approach and supports the findings in the study. It would be of benefit for better cross-referencing to be included in the written statement, in order to stitch the study into the plan and make the public better aware of the intentions of the Council vis-à-vis the visual development of the City.

The structure of each chapter in the Draft Plan generally follows the same format: the context surrounding each topic, the relevant national and regional policies and development objectives after each subject. The Chapters are completed with a list of specific objectives for each subject.

Chapter 1: Introduction and Core Strategy

This chapter outlines 10 strategic goals for the city and links them to the sustainable development goals of the UN. It then provides insight into national and regional policies and has general policies to achieve consistency with them. It gives a prominent position to the MASP. This is consistent with RPO 3.6.1, in relation to collaborative approach with local authorities.

The Assembly suggests greater emphasis should be included to foster collaboration with other regional cities. The core strategy in Table 1.2 references the population growth targets in the RSES and even though these are higher than the ESRI projections, they have been adopted in the core strategy Table 1.8. This is consistent with the narrative in S3.6 of the RSES.

The chapter proceeds to carry out a capacity audit of undeveloped zoned land in the City, including an assessment of the capacity within identified regeneration sites. These are further categorised into Tier 1 and Tier 2 lands. The plan is consistent with RPOs which encourage compact and brownfield development (refer 3.6.3, 3.6.4).

There are links identified between residential development and lands with capacity for employment uses. The areas identified are consistent with the RPO 3.6.5. The chapter proposes to do a joint retail strategy with Galway County which accords with national guidelines and the direction being taken in the Galway County Draft Plan.

There is a description of some of the various plans and strategies which have informed the preparation of the Draft in Section 1.8, which provides good context. These will be supplemented by the preparation of masterplans for all the major regeneration sites, which are intended to deliver on a large quantum of new development in the city. This approach will be examined further below when considering the regeneration Strategy in Chapter 10.

Conclusion: It is considered that these policies in relation to the core strategy are consistent with the RSES.

Chapter 2: Climate Action

The RSES does not have a specific chapter on Climate Action. It is however interspersed consistently through the strategy. The Assembly note and support the prominent position given to climate action in the DGCDP. The chapter discusses many of the practices of sustainable development and shows how climate action is a feature in many chapters of the Draft. It also provides a scenario whereby Galway City could be at the forefront of sustainable development through, inter alia, flood relief scheme, renewable energy infrastructure, integrated transport and land development and sustainable building design.

Conclusion: It is considered that the policies in relation to climate action are consistent with the RSES.

Chapter 3 Housing and Sustainable Neighbourhoods

This chapter sets out the housing strategy and associated policies. These are comprehensive and are consistent with policies in the RSES.

There is a section on traveller accommodation program and these can be accommodated in many land use zonings.

This chapter introduces the concept of the 15 minute city and how different neighbourhoods can achieve this goal. The City is divided into a number of distinctive areas running from the City Centre to the periphery and include inner residential areas, established suburbs and outer suburbs. These designations are of significance in the planning of the City in terms of building heights and densities and in identifying and protecting the character of the City.

There are policies for each of the areas which promote compact and integrated development. The plan also identifies urban villages and sets out appropriate policies for them.

There is a rationale and consistency about the approach taken which treats each area individually whilst complementing their role in the city. The policies are a finer grain than with similar policies in the MASP and are consistent with the RSES (refer RPOs 3.6.2 Compact Development 3.3.6. Building Heights Study 3.6.4 City Centre Sites). They are also consistent with our general placemaking policies (RPO 3.1, 3.2, 3.6).

Conclusion: It is considered that these policies in relation to the housing and sustainable neighbourhoods are consistent with the RSES.

Chapter 4: Sustainable Mobility and Transportation

This chapter, along with the core strategy outlines the vision of how the city will function. It outlines the plans and strategies which have informed the Draft from a transport viewpoint. The Galway Transportation Strategy transportation framework is due to be jointly reviewed in 2022. The policies in the chapter around land use and transportation: the GTS, Sustainable Densities, Transport Hub at Ceannt Station, the N6 and Modal Change for Transport Use are consistent with RPOs 3.6.7 (GTS), 3.6.8 (Reverse Commuting) and 3.6.9 (Dual Railway Track).

The delivery of all the elements of the GTS will be a challenge for the City and the Assembly suggests that co-ordination and prioritisation should form significant elements for the proposed review. The development and identification of Park and Ride facilities for example need to become more prominent, to facilitate long distance commuters and visitors to the City.

The chapter gives good policy directions for walking and cycling and has demand management as a prominent goal, as the City strives to promote modal change.

The chapter has a very comprehensive suite of specific objectives designed to deliver the many facets of the GTS.

Conclusion: It is considered that the policies in relation to sustainable mobility and transportation are consistent with similar policies in the RSES.

Chapter 5: National Heritage and Recreation and Amenity

This chapter provides a comprehensive schedule of green networks in the city, circa 20% of the lands within the City are green. The Draft Development Plan, similar to the RSES, considers these to be

assets which provide important services to the City in terms of visual amenity, contribution to the character of the city and ecosystem services. They need to be protected in all of their guises, whether they comprise open space, protected habitat, protected views or agricultural land. This is consistent with the overarching environmental objectives in Section 1.5 of the RSES. It is also consistent with more specific objectives RPO 5.2 Landscape, RPO 5.5 Biodiversity, RPO 5.6 Ecosystem Services and RPO 5.7 Environmental Assessments.

The Assembly would ask the Council to consider inclusion of RPO 5.4, which encourages the preparation of site-specific conservation objectives for all sites of conservation value. The Assembly notes in particular that the Council will continue to prepare master plans for those green areas that do not have them and will continue to implement those master plans that have already been prepared.

Conclusion: It is considered that the policies in Chapter 5 of the DGCDP are consistent with those in the RSES.

Chapter 6: Economy, Enterprise and Retail

This chapter outlines the economic success of Galway and the factors that contribute to it and sets out general policy for continuation. It would be informative if the NPO 1c of the National Planning Framework (NPF) which links population growth and employment growth were referenced; the RSES indicates that a ratio of 0.66:1 jobs to population growth is a target for compact growth and integrated development. This would also contextualise the targets driving the implementation of national, regional and local plans.

The chapter shows the concentration of commercial activities in the city and identifies the areas for high density employment. There is a reference to the former Galway Airport as an opportunity site for economic purposes. The Assembly note that RPO 3.6.6, which gives regional perspective on the redevelopment of the airport site is not referenced and recommends that this be included.

The chapter goes on to describe different employment sectors such as high tech, office, enterprise and innovation, health and education, tourism, marine and creative. It sets out policies for each of the sectors. These accord very well with similar policies in the RSES and there is a high level of consistency.

The Chapter then deals with Retail Strategy and acknowledges the hierarchy in the RSES. There is an objective to prepare a joint retail strategy with Galway County Council, who have a similar approach. There are no additional lands zoned pending completion of the strategy.

Conclusion: It is considered that the policies in Chapter 6 of the DGCDP are consistent with those in the RSES.

Chapter 7: Community and Culture

This chapter outlines the many community assets in the City and the intentions of the Council to protect them. The Draft Plan references the equitable provision of services, flexibility in building design and energy efficiency. It references a series of policy documents which have informed the Draft with respect to the Creative Arts, Inclusivity, Health, Wellbeing, Education, Promotion of Irish, Early Childhood Services and Healthcare. It also promotes the proposition that institutional lands remain as they are, with the proviso that they may be developed if they become surplus to the

requirements of the institution. There are detailed policy directions for all of the areas listed above. The Draft also undertakes to prepare a community infrastructure audit for the City.

The above policies are reflected in the RPOs in Chapter 7 of the RSES and the narratives in Section 3.6 on the MASP.

Conclusion: It is considered that the policies in Chapter 7 of the DGCDP are consistent with those in the RSES.

Chapter 8: Built Heritage

This chapter initially deals with the RPS and ACAs in the City. The Assembly do not have any statutory role in designating either of these and do not have any direct RPOs applicable to these features of the City. In addition to its built heritage, the city has, because of its long history, rich archaeology and the draft plan has comprehensive policies to protect it. There are some RPOs in the RSES which are of a general nature e.g., RPO 4.6 (Built Heritage in Destination Towns) 4.15 (Built Heritage WAW) and RPO 5.14 (Protection and Archaeology) which would accord with the much more detailed approach of the DGCDP.

The chapter goes on to discuss urban design and placemaking and introduces the Galway Public Realm Strategy 2019. It outlines principles of Good Urban Design, the contribution that can be made by the Building Heights Study, the areas identified for regeneration, shopfront policies and the proposed schedule of LAPs Ardaun (18-24), Murrough, Headford Road. It lists policies for Good Urban Design. As part of the public realm description, it identifies the typology of streets in the City Centre, together with proposed schemes.

Placemaking is an important part of the RSES and is fundamental to our growth ambitions. This is outlined in Sections 2.2, 3.3 and 3.6 of the RSES.

Conclusion: It is considered that the policies in Chapter 8 of the DGCDP are consistent with those in the RSES.

Chapter 9: Environment and Infrastructure

The first item discussed in this section is Flood Risk Assessment. The Coirib go Cósta Flood Relief Scheme is referenced. It is programmed to commence construction in 2025 and will take 3 years to complete.

The next topic is water quality and the importance of the RBMP is noted. The water services section references the Terryland Water Treatment Plant and other capital works through the Tuam Regional Water Supply Scheme. There is an account of production capacities: it would be useful in planning for future growth if data on water storage capacity were included in the plan. There is also reference to the Mutton Island Treatment plant and its capacity and the preparation of Drainage Area Plan, and a parallel Network Development Plan - these are due for completion in 2023.

The chapter goes on to discuss the Seveso site in Galway Port, Air Quality Policies, the Noise Action Plan, Light Pollution and Waste Management. The current Regional Waste Management Plan is due to be replaced with a National Plan this year. There are sections on Telecommunication and a SMART City. It references the Digital Strategy for Galway (20-24).

The Plan supports and references the policy documents of Electricity Undertaker and how they will impact on the City. The Council has also commissioned an Energy Master Plan for the City with a view to identifying decarbonisation projects.

The RSES includes many of the objectives in the Draft, particularly in Chapter 6: Connected Region and Chapter 7: Infrastructure Enabling our Region.

Conclusion: It is considered that the policies in Chapter 9 of the DGCDP are consistent with those in the RSES.

Chapter 10: Compact Growth and Regeneration

This chapter, which is one of the bigger chapters in the draft, deals with the very ambitious regeneration projects in the city. There are 20 areas identified for Masterplans and Spatial Frameworks. These are for the most part to be carried out by the landowners. The DGCDP provides guidance on design briefs for each of the areas, but the Assembly has concerns with the risk that the future of the city will be developer-led rather than plan-led. In addition to the above there are 3 LAPs proposed for the City. The plan would benefit from greater clarity on the prioritisation and scheduling of the various proposals - a masterplan for the masterplans so to speak.

The Assembly commends the Council for its widespread approach to regeneration throughout the City and this accords with national and regional goals for compact development. The Assembly encourages the council to give greater prominence to the Urban Density and Building Heights study in defining the development parameters for the opportunity sites.

Conclusion: It is considered that the policies in Chapter 10 of the DGCDP are consistent with those in RSES.

Chapter 11: Development Standards

There is a very comprehensive schedule of technical requirements for all types of development which will aid and inform planning applications. There is no comparable section in the RSES. The Chapter also includes development proposals for different sites throughout the City, using thumbnail drawings of excerpts from the Draft Plan. These could be improved if areas of zoned land were given and cross-referenced to the building heights study.

Appendices

There are also 4 Appendices to the Draft Plan, comprising:

1. Implementation and Monitoring
2. Statement of Compliance with Ministerial Guidelines.
3. RPS
4. Glossary and Acronyms

Appendix 1 is the only one that has regional significance. This appendix acknowledges the requirements to monitor the implementation of the Plan. The Assembly is embarking on a similar process for the RSES and look forward to collaboration with the council in that regard.

It would also suggest that a joint approach between the City and County Councils in relation to the monitoring of the MASP should be considered.

Recommendations and Observations

Summarised below are those areas where the Assembly considers that consistency could be improved.

Recommendations

1. That Chapter 1 places greater emphasis on fostering collaboration with other regional cities, consistent with RPO 3.6.1 of the RSES.
2. That Chapter 5 of the Draft Plan include consideration of RPO 5.4 of the RSES, which encourages the preparation of site-specific conservation objectives for all sites of conservation value.
3. That Chapter 6 references NPO 1c of the National Planning Framework (NPF) which links the creation of jobs and population growth at a ratio of 0.66:1.
4. That the section in Chapter 6 on the former Galway Airport as an opportunity site for economic purposes includes reference to RPO 3.6.6 of the RSES, which requires the preparation of a masterplan, including associated lands for residential, community and employment uses.

Observations

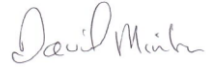
1. That co-ordination and prioritisation form significant elements for the proposed review of the GTS referenced in Chapter 4. For example, the development and identification of Park and Ride facilities need to become more prominent, to facilitate long distance commuters and visitors to the city.
2. The Assembly suggest that data on water storage capacities be included in Chapter 9 of the Plan, in order to better inform the public and plan for the city.
3. The Assembly suggest that a prioritisation and scheduling scheme be provided for the many regeneration masterplans etc. proposed for the city and that greater prominence be given to the Urban Density and Building Heights Study in regeneration proposals.
4. The Assembly suggest that development proposals for different sites outlined in Chapter 11, using thumbnail drawings of excerpts from the Draft Plan be improved with reference to areas of zoned land and cross referenced to the building heights study.
5. That a joint approach between the City and County Councils in relation to the monitoring of the MASP be considered.

Conclusion

The Assembly is generally satisfied that the DGCDP is highly consistent with the Policy Objectives in the RSES. It is believed that inclusion of the recommendations and consideration of the observations will ultimately strengthen the governance of the Development Plan upon adoption.

The Assembly acknowledge the quality and clarity of the documentation published in the Draft Plan and 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.

Mile le mas,



David Minton
Director