



Galway County Council
Áras an Chontae
Planning Department
Prospect Hill
Galway

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

26 July 2023

PROPOSED MATERIAL ALTERATIONS (PMA) TO THE TUAM LOCAL AREA PLAN

A Chara,

I refer to your notification on 27 June 2023 regarding the Proposed Material Alterations (PMA) to the Tuam Local Area Plan (TLAP). The Northern and Western Regional Assembly ('the Assembly') wish to thank you for the opportunity to make this submission.

The Assembly is not a prescribed body for LAPs, however it has been the policy of the Assembly to engage with the LAP process for key towns such as Tuam.

This submission will summarise the Assembly's engagement to date on the TLAP and provide a commentary on the PMAs with respect to their consistency with the objectives of the Regional Spatial and Economic Strategy (RSES).

The Municipal District Council (MDC) has determined that the implementation of the PMAs would require an SEA and would not require a stage 2 AA. The requirement for an SEA revolved around PMAs 9,38,39,49,50, 51, 55 and 56. These could generally be categorised as increasing the probability of development in areas at risk of flooding and promoting more peripheral development in the town.

In its submission on the Draft LAP, the Assembly made the following recommendations:

1. Population projections be aligned with those in the RSES.
2. Regeneration Masterplan become an integral part of the LAP.
3. Timeframes for Eastern ring road be included.
4. Zoned land quantum recognise:
 - a. Contribution of existing lands to deliver housing.
 - b. High level of R2 zoning.
 - c. Flexible use and location of residential densities.

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There are a number of the PMAs which partially accept recommendation 2 and the amount of R2 lands are proposed to be reduced by 24 Ha, which could be related to recommendation 4b. The former is dealt with in PMA3 which is a new policy specifically referring to regeneration and there are a number of PMAs throughout the plan area which result in a net reduction in R2 lands.

There are 62 PMAs - over 40% of these relate to land use zonings (LUZ). The majority of the remainder comprise recommendations from prescribed bodies such as OPR, DHLGH, OPW, NTA and IW. The Assembly support all of these recommendations. We draw particular attention to PMA13, recommended by TII, which requires any new development within 300 metres of a national road or a proposed national road to provide unspecified noise mitigation measures.

The proposed LUZ changes are quite extensive and apply to many uses (11 in all). The Assembly do not propose to comment in detail on individual changes, except where they may have a regional significance. We have examined the proposed changes at a macro level and report that they include proposals to increase R1 lands by 12Ha., reduce R2 lands by 24ha., increase BE (Business & Enterprise) by 7.7Ha., increase BT (Business & Technology) lands by 46.8Ha., reduce I (Industrial) lands by 30.4Ha., increase open space by 27Ha. and reduce A (Agriculture) lands by 20.5Ha. The remaining proposed changes are small in comparison and have no regional significance.

The following Land-Use Zoning (LUZ) proposals are worth addressing:

- **PMA32** proposes to change agricultural lands to R1 just north of lands subject to flooding. There is no rationale given for this proposal.
- It would be informative if an infrastructure audit were provided with **PMA37,38** which proposes to change R2 lands to R1 lands.
- There is no obvious reason given with **PMA40**, which proposes to create R2 lands (.734Ha.) outside the development envelope.
- Similar to PMA 38, it would be informative if an infrastructure were provided for **MA49 R2 to R1 (7.3 Ha.)**.
- **PMA 54** proposes to extend the development envelope for new BT lands (13.3Ha.) adjacent to the N17. There already is a significant amount of undeveloped BT lands and potential access to these lands is unclear. It would be important to ensure that access does not interfere with the optimal use of the N17 as provided within RPO 6.5 of the RSES.
- **PMA60** proposes to extend the development envelope. There is no rationale given. The Assembly do not consider this to be consistent with the RSES in terms of compact development and prioritisation of serviced land.
- The Assembly are concerned that **PMAs 9, 38, 39, 49, 50, 51, 55 and 56** increase the probability of development taking place in areas at greater risk of flooding and that increasing such potential would not be consistent with the RSES.
- Furthermore, **PMA 50 and 51** may compromise the strategic capacity of the national roads network, contrary to RPO 6.5 of the RSES.

Conclusion

The Assembly consider that the majority of the PMAs do not create any consistency issues with the RSES. The instances where, in the opinion of the Assembly there is an inconsistency, they are identified and it is recommended that these proposals would not be accepted by the MDC. In relation to the proposed LUZ changes, especially the large increase in BE and BT lands, there is no justification presented which explains that these would be consistent with compact development or

relate to the Jobs to Population Growth ratio espoused in the National Planning Framework and RSES. The proposed increase in R1 lands would raise similar concerns and is contrary to the core strategy. The Assembly cannot therefore conclude that these are consistent with the RSES.

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