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via email: devplan@galwaycity.ie

RE: PROPOSED MATERIAL ALTERATIONS (PMAS) TO THE DRAFT GALWAY CITY PLAN

A Chara,

I refer to the notification received from Galway City Council on 8 September 2022 in respect of the above Proposed Material Alterations and the Northern and Western Regional Assembly wish to take this opportunity to make its submission in respect of them.

It is noted that there are 183 PMAs to the Draft Plan and that the Council has updated the environmental reports in considering the implications of the PMAs. The majority of the PMAs comprise references to updated policy or technical documents and minor textual changes. Many of these are individually not of regional significance and the Assembly wish to comment in more detail on the significant changes proposed to the draft and those that have regional significance.

There are four broad areas that could fit into these categories; these are in the first instance zoning changes in the early parts of the PMAs. These are mainly concerned with new residential zonings in mostly peripheral areas of the city. Secondly, there are significant changes to the core strategy which will be elaborated on further below. Thirdly, there are proposed changes to the City's intentions with respect to the airport site. Finally, there is the proposed omission of a number of specific objectives to c. 20 parcels of residential lands throughout the city.

In addition to the zoning changes proposed, the Low Density Residential (LDR) zoning is replaced by an R2 zoning which is an objective to provide for sensitive residential infill. This new zoning has many similarities to the existing zonings and does not create any consistency difficulties with the RSES. There are up to 30 zoning changes in all, most of them relatively small scale and localised.

The most significant changes arising from the PMAs are contained within proposal A37 which, if adopted, will change the core strategy. The City Council is stating that the population targets set in the RSES will not be met for the years 2026 and 2031. The plan will nevertheless have regard to the targets set for 2040. Table 1.7 (Strategic Growth Areas) in the Draft Plan is expanded on with more detailed explanations and has been renamed as the settlement strategy. This does not raise any consistency issues with the RSES.

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Table 1.8 Housing Targets may be replaced by a Settlement Capacity Audit which introduces a phasing element to lands zoned residential and for regeneration. This approach is supported by the Assembly and is considered to be consistent with the RSES. It is proposed to reduce the number of identified regeneration sites from 20 to 19. It would be beneficial if the lands that are categorised as 'headroom' and included in Table 1.8 were identified and quantified. It is appropriate at this juncture to reference Appendix 5 (new) and this contains an infrastructure assessment of lands in different areas of the City, which will benefit the coherence of the plan.

The core strategy table is proposed to be replaced with a more detailed version, which provides details and targets for different areas in the City. These are specifically referred to in S1.5.3 of the PMA on page 54. There is a recognition in this PMA that there is enough land zoned for 2000 extra dwellings under the concept of 'additional provision'. It would be useful to better inform the public if the areas proposed to be served by Irish Water in Ardaun were mapped.

The next area of interest for the Assembly is PMA A. 99 which makes reference to the Airport Site. It describes the framework plan carried out by Galway County Council which will inform a master plan for industrial and enterprise uses. The NTA, TII and IW are identified as stakeholders. This PMA is not consistent with the RSES; RPO 3.6.6 specifically requires mixed uses to be included. The Assembly recommend that the plan espouses the preparation of a masterplan for the airport site with mixed uses as set out in RPO 3.6.6.

The final group of PMAs from chapter 11 which have regional significance is the proposed omission of c.20 parcels of land which had specific objectives to allow various types of residential development (refer A. 162). These are to a large degree mirrored in the proposals above to create R2 zoning. The outcome in relation to overall areas zoned is that there is no significant net increase in the quantum of land earmarked for residential uses. The proposal is supported by the Assembly. There are also a number of PMAs in this chapter which identify lands that require a flood risk assessment, which will benefit the plan.

Miscellaneous Proposals.

The Assembly would generally support other PMAs which are relatively minor. However, specific comment is made to a number of them below.

A.139 – This is a textual amendment which will require developers (at their own expense) to provide arts/cultural facility in inner harbour regeneration site. There is no guidance given as to quantum or recompense if the facility is in excess of that required to service the development permitted.

A. 99 - The NWRA is not identified as a stakeholder with respect to the proposed masterplan for the airport site.

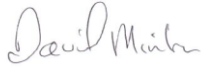
A. 147 – This is a new policy which proposes to give priority to the development of strategic regeneration and opportunity sites. It is not clear how such a policy would be enforced or what it actually means.

A. 170 – This is an amendment to S11.9 Commercial and Industry. This requires evidence of consultation with Irish Water before a planning application is lodged - to ensure water services will be available. This may be difficult for applicants to deliver as commitments from Irish Water may be difficult to obtain at early stages of projects. There is already a statutory consultation with Irish Water as a prescribed body.

In conclusion, the Assembly believes that there is generally a high level of consistency between the Draft Plan and the RSES. The Proposed Material Amendments, if adopted, have the potential to raise the level further - subject to the above recommendations being incorporated.

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