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

14/03/2024

## RE: DRAFT DIRECTION TO THE ATHENRY LOCAL AREA PLAN 2024-2030

A Chara,

I refer to the Department of Housing, Local Government and Heritage's Notice of Intention to Issue a Direction to Galway County Council regarding the Athenry Local Area Plan 2024-2030 dated 19 February 2024.

The draft Ministerial Direction intends to direct Galway County Council to take steps to revert zoning at eight locations in the Adopted ALAP to the proposed use in the Draft ALAP and apply all necessary consequential updates to the text of the plan. In summary, the reason given for the draft Ministerial Direction is the over zoning of land for residential use in excess of what is required, at peripheral locations. In addition, it is stated that there is a failure to have a sequential approach to development and inconsistency with Galway County Development Plan objectives (CS 1, CS 2, CS 3, CGR 1 and CC8); Regional Spatial and Economic Strategy Regional Planning Objectives (RPO 3.1 and RPO 3.2) and National Planning Framework (NPO 33). The full text of these objectives is set out in Appendix 1 of this submission.

An image of the lands subject to the draft Ministerial Direction has been provided by Galway County Council in their document titled "Athenry Local Area Plan 2024-2030 February 2024 Particulars of Draft Direction" and is contained in Appendix 2 of this submission. The zoning map of the adopted Athenry LAP is also included in Appendix 3 of this submission.

The NWRA made a submission on the draft Athenry Local Area Plan dated 3 July 2023. In conclusion, the submission stated:

*"There is a good to high level consistency in the ALAP with the relevant policy objectives in the RSES. The Assembly recommends the following:*

- 1. Re-examination of the quantum of lands zoned for residential development, in the context of population growth and housing completions since 2016 and recent job announcements.*
- 2. Consideration of the inclusion of infrastructure audits within the written statement in the context of zoning lands."*

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The NWRA did not make a submission in relation to the proposed amendments to the draft Athenry LAP.

The NWRA having considered:

- the Draft Ministerial Direction;
- the Draft Athenry Local Area Plan 2023-2029;
- the NWRA submission on the draft Athenry Local Area Plan dated 3 July 2023;
- the Chief Executive's Reports published during the plan-making process; and
- the adopted Athenry Local Area Plan 2024-2030

have the following overall observation to make on the draft Ministerial Direction, followed by specific comments on each of the subsections of (2)(a) of the draft Ministerial Direction.

### **Overall observation**

The draft ALAP outlines in its Core Strategy Table (Table 1 in Appendix 3 of this submission) that population allocation is 1,350, with a requirement of 544 housing units to be delivered on greenfield sites and 223 housing units to be delivered on brownfield/infill sites. It is stated on p.7 of the adopted Athenry Local Area Plan that:

*"The Core Strategy of the Galway GCDP 2022 – 2028 has identified a target population growth of up to 1,350 persons for Athenry to 2028, which results in a maximum requirement for 21.8 ha of zoned residential land."*

The quantum of zoned land zoned in the adopted ALAP is set out in Table 2 on p16 of the adopted ALAP (Appendix 2 of this submission). In total, 101.56ha of land is zoned for residential development (Phase 1 (41.06ha), Phase 2 (58.9ha) and Infill (1.6ha)). This extent of residential land without adequate amplification or justification appears excessive, being almost five times that estimated to be required. In addition, this does not take into account residential units that could be delivered on other land that facilitates residential units such as Town Centre and Commercial/Mixed Use zoning. Therefore, it is clearly evident that the adopted A.LAP has over zoned for residential development.

Furthermore, the RSES, through Regional Policy Objectives 3.1, 3.2, 3.3 and 3.4, requires the achievement of compact urban growth; and the delivery of at least 30% of all new homes in settlements such as Athenry within the existing built-up footprints. It is considered that the adopted ALAP would be contrary to these objectives, in particular the lands subject to the draft Ministerial Direction as illustrated on the aerial view of the sites in Appendix 2.

**Part (2)(a) of the draft Ministerial Direction** (proposed Direction text in *italics*):

*(2) The Planning Authority is hereby directed to take the following steps with regard to the Local Area Plan: (a) Delete the following material alterations from the adopted Local Area Plan such that the subject lands revert to as indicated in the draft Local Area Plan:*

*(i) Material alterations MA46, MA47 and MA49 - i.e. the subject lands revert to Outside the Settlement Boundary and not zoned, from Residential Phase 1.*

**NWRA comment:** The lands referenced MA46, MA47 and MA49 are located to the southwest, south and southwest respectively of the town, outside the development boundary of the draft plan where there are some services requiring moderate or significant intervention. Taking into consideration that there is already a significant quantity of land zoned for residential development elsewhere in the plan area, the NWRA support (2)(a)(i) of the draft Material Direction.

*(ii) Material alterations M51 - i.e. the subject lands revert to Outside the Settlement Boundary and not zoned, from Residential Phase 2.*

**NWRA comment:** The land referenced M51 is located to the southwest of the town, outside the development boundary of the draft plan where there are some services requiring significant intervention. Taking into consideration that there is already a significant quantity of land zoned for residential development elsewhere the NWRA support (2)(a)(ii) of the draft Material Direction.

*(iii) Material alteration MA60 - i.e. the subject lands revert to Agriculture from Residential Phase 2.*

**NWRA comment:** The land referenced MA60 is located to the southeast of the town, where there are some services constraints. Taking into consideration that there is already a significant quantity of land zoned for residential development elsewhere in the plan area, the NWRA support (2)(a)(iii) of the draft Material Direction.

*(iv) Material alteration MA50 and MA59 - i.e. the subject lands revert to Open Space/Recreation & Amenity from Residential Phase 2.*

**NWRA comment:** The lands referenced MA-50 and MA59 are located to the southeast of the town, where there are service constraints, some requiring significant intervention. Taking into consideration that there is already a significant quantity of land zoned for residential development elsewhere in the plan area, the NWRA support (2)(a)(iv) of the draft Material Direction.

*(v) Material alteration MA48 - i.e. the subject lands revert to Outside the Settlement Boundary and not zoned from Residential Existing.*

**NWRA comment:** This land referenced MA48 is located south of the town, outside the draft plan boundary, with no indication of service provision. While it is acknowledged that the land appears to have a residential unit on it, it is outside the development boundary of the draft Local Area Plan. Zoning it residential may permit a higher density development on the land and taking into consideration that there is already a significant quantity of land zoned for residential development elsewhere in the plan, the NWRA support (2)(a)(v) of the draft Material Direction.

*'And apply all necessary consequential updates to the text of the plan consistent with the foregoing'.*

**NWRA comment:** The necessary consequential updates will be required to ensure consistency within the plan.

## Conclusion

In order to be consistent with the objectives of the National Planning Framework, the Regional Spatial and Economic Strategy for the Northern and Western Region 2020-2032 and the Galway County Development Plan 2022 – 2029, the NWRA support the draft Ministerial Direction to the adopted Athenry Local Area Plan 2024-2030 in its entirety.

I trust that the above is of assistance and the Assembly wish to thank Galway County Council for the opportunity given to provide this submission. If you have any queries in respect of the above, then do not hesitate to revert.

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**Denis Kelly**  
**Director**

## APPENDIX 1 -

## RELEVANT OBJECTIVES IN THE GALWAY COUNTY DEVELOPMENT PLAN 2022-2028, REGIONAL SPATIAL AND ECONOMIC STRATEGY 2020-2023 AND NATIONAL PLANNING FRAMEWORK

RELEVANT OBJECTIVES IN THE GALWAY COUNTY DEVELOPMENT PLAN 2022-2028, REGIONAL SPATIAL AND ECONOMIC STRATEGY 2020-2023 AND NATIONAL PLANNING FRAMEWORK		
PLAN	OBJECTIVE REFERENCE	OBJECTIVE TEXT
GALWAY COUNTY DEVELOPMENT PLAN 2022-2028	CS 1	Implementation - To secure the implementation of the Core Strategy and the Settlement Hierarchy in so far as practicable, by directing sustainable growth towards the designated settlement.
	CS 2	Compact growth - To achieve compact growth through the delivery of new homes in urban areas within the existing built-up footprint of settlements, by developing infill, brownfield and regeneration sites and prioritising underutilised land in preference to greenfield sites.
	CS 3	Population Growth - To support and manage the self-sufficient sustainable development of all settlements in a planned manner, with population growth and the development of economic, physical and social infrastructure.
	CGR 1	Compact Growth - To require that all new development represents an efficient use of land and supports national policy objectives to achieve compact growth in towns and villages. Development of lands with no links to the town or village centre will be discouraged.
	CC8	Climate Action and Development Location - To implement, through the plan and future local areas plans, policies that support and encourage sustainable compact growth and settlement patterns, integrate land use and transportation, and maximise opportunities through development location, form, layout and design to secure climate resilience and reduce carbon dioxide and greenhouse emissions.
NWRA REGIONAL SPATIAL AND ECONOMIC STRATEGY 2020-2032	RPO 3.1	Develop urban places of regional scale through: <ul style="list-style-type: none"> <li>&gt; Delivering on the population targets for the Metropolitan and Regional Growth Centres through compact growth:</li> <li>&gt; Delivering significant compact growth in Key Towns; and</li> <li>&gt; Developing derelict and underutilised sites, with an initial focus within town cores.</li> </ul>
	RPO 3.2	(a) Deliver at least 50% of all new city homes targeted in the Galway MASP, within the existing built-up footprint of Galway City and suburbs. (b) Deliver at least 40% of all new housing targeted in the Regional Growth Centres, within the existing built-up footprint. (c) Deliver at least 30% of all new homes that are targeted in settlements with a population of at least 1,500 (other

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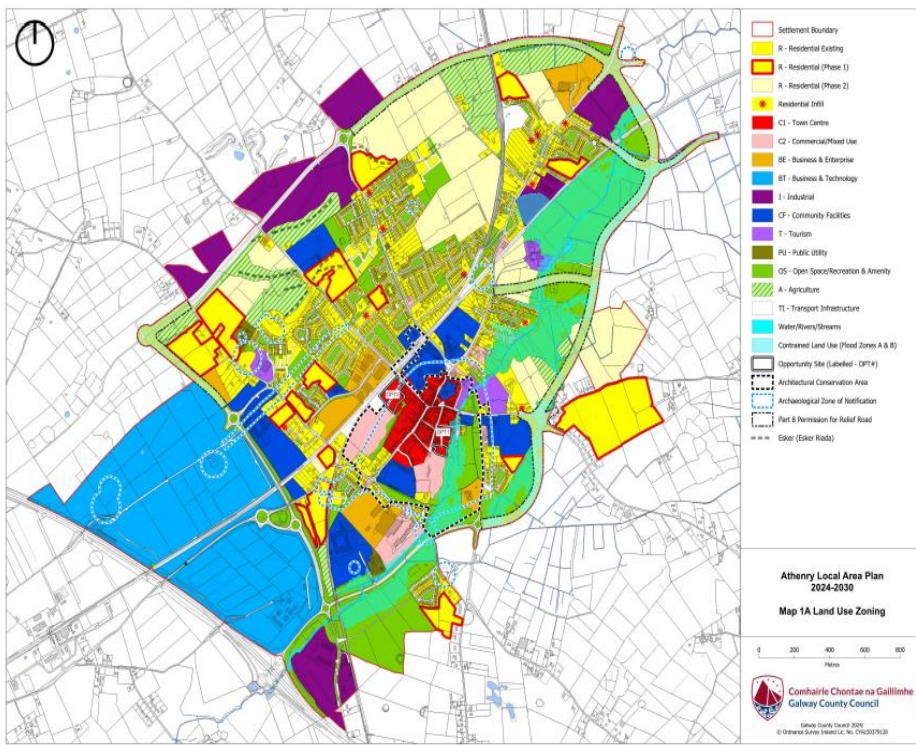
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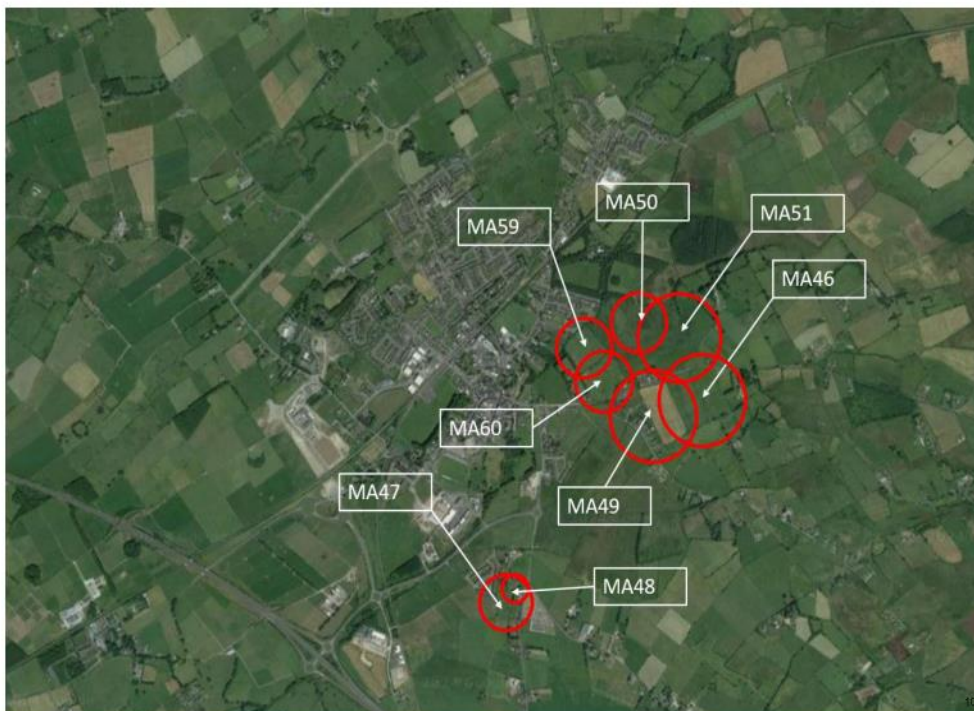
		than the Galway MASP and the Regional Growth Centres), within the existing built-up footprints.
	RPO 3.3	Deliver at least 20% of all new housing in rural areas on brownfield sites.
	RPO 3.4	To support the regeneration and renewal of small towns and villages in rural areas.
<b>NATIONAL PLANNING FRAMEWORK</b>	NPO 33	Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

## APPENDIX 2 – ADOPTED ATHENRY LAP ZONING MAP AND AERIAL VIEW OF THE EIGHT SITES SUBJECT TO THE DRAFT MINISTERIAL DIRECTION

### ADOPTED ATHENRY LAP ZONING MAP



### Aerial View of 8 Sites in Context



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### APPENDIX 3 – CORE STRATEGY TABLE & QUANTUM OF LAND ZONED IN THE ADOPTED ATHENRY LAP

Settlement Typology	CSO 2016	Core Strategy Allocation	Residential Units to be Delivered on Greenfield Sites	Density	Quantum of Greenfield Land Required for Residential Development	Residential Units to be Delivered on Infill/Brownfield Sites
Athenry Strategic Potential	4,445	1,350	544	25	21.8	233

Table 1: Core Strategy

Table 2 below lists the quantum of land zonings within the Athenry LAP area.

Land Use Zoning	Total Area Zoned (HA)
Residential Phase 1	41.06
Residential Phase 2	58.9
Residential Infill	1.6
Town Centre	12.35
Commercial/Mixed-Use	12.67
Business and Enterprise	19.05
Business and Technology	97.0
Industrial	42.0
Tourism	6.16
Community Facilities	34.8
Open Space/Recreational Amenity	130.0
Agriculture	29.22
Public Utilities	2.1

Table 2: Land Use Zonings