



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

23 February 2022

RE: DRAFT GALWAY COUNTY DEVELOPMENT PLAN 2022-2028 – MATERIAL ALTERATIONS

A chara,

I refer to your correspondence received on 3rd February 2022, inviting the Northern and Western Regional Assembly to make a submission on the above-mentioned proposed Material Amendments (MAs) to the Draft Galway County Development Plan 2022-2028. The Assembly have engaged with all stages of the process and commend the council on processing and considering the large number of submissions received on the draft plan. The Assembly look forward to receiving notification under Section 12(5)aa, providing the reasoning involved in considering its previous submission on the draft.

Format of Submission

The Assembly note there are over 250 proposed MAs in Volumes 1 and 2 of the draft. The submission will concentrate on issues that have regional significance in terms of consistency or otherwise with the RSES. It will comment on selected MAs in this regard. The Assembly will generally support the remaining proposals in Volume 1 which involve relatively minor narrative changes, updates on technical and /or published documents referenced in the draft, and changes to development objectives. In relation to Volume 2 the Assembly will restrict its commentary to issues pertaining to MASP towns and will not provide any commentary or analysis on proposed zoning changes in small growth towns or small growth villages, as these are not specifically referenced in the RSES.




The Assembly at its meeting on 18/2/22 considered the proposed MAs and resolved to make this submission, which incorporates its report on the proposed MAs and recommendations and Observations.

Commentary on Selected Proposed MAs to Volume 1

(i) MA 2.3:

The Assembly notes that Household Supply Targets Methodology is used to estimate the

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number of house-completions required in the county to meet demand. It uses, as a basis, the population figures that informed the draft and these are given in Table 2, which has been extended out to 2031. The house completions are currently running at an average 678 units per annum. The proposed housing delivery will require, on average, 1351 completions per annum up to 2028. This will require that construction output over these years will more than double from current levels. This will require significant focus and the allocation of resources needed to achieve this level of growth may not be realistic nor achievable.

The levels of completion needed in the key towns will be many multiples of the more than double figure for the whole county. The completion figures for each, published by the CSO, indicate delivery of 19 units per annum was achieved for Tuam and 13 units per annum for Ballinasloe in the years since the last census. The core strategy table indicates that delivery will need to be accelerated further post 2028 to achieve the targets outlined for 2031.

The *'Development Plans, Draft Guidelines for Planning Authorities'* were issued in August 2021, and by Circular letter NRUP 04/21, it was advised that they were to assist in undertaking statutory evaluation and assessment of draft plans. It identifies the need to bring balance between 'strengthening settlements with a level of targeted housing growth, while reflecting a realistic estimate of rural housing growth over the lifetime of the plan.' It is within this context and through the lens of the RSES that the Assembly raised concern to the Draft CDP core strategy allocations.

The matter of consistency with the population targets in the RSES for the Key Towns (Tuam and Ballinasloe) is still an issue for the Assembly. The revised core strategy table proposed a 30% increase for these towns by 2028 and a 45% increase for Ballinasloe and Tuam by 2031. The RSES plans for a 30% increase for these towns by 2040. There are significant differences between the targets which can have a distorting influence in Galway on the provision, delivery and cost of infrastructure.

The Assembly notes that whilst the population figures in the core strategy table remain the same in the Draft and in the Material Alterations, the household size in the MA is 1.74 and it is 2.5 in the Draft. S 2.3.7(MA 2.2) quoting the NPF and CSO states that average household size will converge towards 2.5 by 2040. There is no difference made between the household size in urban and rural areas. This anomaly requires detailed clarification, as it is quite confusing.

In its previous submission, the Assembly commented on the population allocation between urban and rural areas, with the allocation for urban areas being frontloaded into the 2020s. This practice continues in the revised core strategy table. The concept of balanced

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development between urban and rural areas is a feature of both the NPF and RSES. It should also be a feature of local development. In order for communities to be vibrant and healthy there needs to be replenishment on a continuous basis. There are more additional people allocated to live in Tuam (pop. 8,700) than there is allocated for the Rural Remainder (pop. 132,000).

(ii) MA 2.6, 2.13, 3.3, 4.1, 4.2, 4.3, 4.4, 4.5, 4.6, 4.7, 4.8:

The above proposed MAs deal broadly with rural housing. The Assembly does not propose to examine the above in detail as it believes Galway County Council is best placed to manage rural housing policy in Galway and the Assembly generally supports the proposals above. It does wish to make a small number of observations.

The Assembly notes the general support policy for affordable housing and the identification of An Spideail as a suitable location for same; identification of other suitable areas would be welcome. In the policy for rural typologies (MA 4.1) urban fringes are added for a number of towns e.g. Tuam, Gort, Athenry; - in the interest of consistency, should a similar fringe be established for Ballinasloe? In relation to the renovation of derelict dwellings (MA 4.5) - which is fully supported by the Assembly - whilst the character of existing buildings is important, more weight should be given to constructing modern, well-serviced and designed buildings.

(iii) MA 5.1

MA5.1 relates to the preparation of a Masterplan for the Former Galway Airport Site. Regional Policy Objective 3.6.6 requires the preparation of a masterplan for the Airport Site and developed lands (including associated lands) in its immediate hinterland (on both sides of the R339) for residential, community and employment use. The proposed MA only relates to employment uses on the former Airport Site, rather than residential, community and employment uses - this is not consistent with RPO 3.6.6.

The development plan should consider embracing a more inclusive approach to developing what should be a long-term integrated development, which examines residential and community facilities as well as commercial development, consistent with the provisions of the RSES.

(iv) MA 6.20

This is a new policy objective which proposes to avoid creation of new access points onto national roads. It is supported by the Assembly. In the interests of clarity, the Assembly



suggest that the policy be specifically titled 'New accesses directly onto National Roads' to ensure that it is not confused with indirect access, via the regional and local road network that accesses national roads.

(v) MA7.1-7.17

The above proposed MAs generally refer to water services infrastructure and comprise, in the main, relatively minor alterations, updating information and referencing technical documents. These would be supported by the Assembly. The Assembly wish to make the following points in relation to particular concerns:

MA 7.5 refers to requiring high standard sewage treatment plants only. This might infringe on developers wishing to avail of the most economically and environmentally advantageous designs, rather than be constrained to accepting a pre-determined option.

The proposals under MA 7.8 to exclude certain areas (Tuam, Ballinasloe) as being suitable for regional waste management facilities is short of much relevant information in terms of technical appraisal and evidence and does not include any maps to examine or determine the areas involved. It could be contrary to regional policy in its present format.

The Assembly note that Table 7.10 does not contain any numerical data on headroom capacities even though these are recorded in the SEA report. It would inform the public much better if this information on the environment was included as part of MA7.16, even if it is made conditional that the data relates to a certain point in time and is subject to ongoing change.

(vi) MA 11.6

The Assembly note the new objective recognising the importance of Portiuncla Hospital, this is consistent with RPO 7.10 with respect to the provision of healthcare facilities.

(vii) MA 15.2

The Assembly note the proposal to redefine residential densities in Table 15.1. There is a proposal to prepare a density typology study for the county, the results of which could have a bearing on what are considered appropriate densities in the future. Table 15.1 should acknowledge that the typology study could change the density outcomes.

Commentary on Proposed Alterations to Volume 2

Volume 2 contains area plans for the MASP (included are the towns of Baile an Chlair, Bearnna and Oranmore and the areas of Briarhill and Garraun which are immediately



adjacent to the city). The volume also contains area plans for the small growth towns and the small growth villages in the County. The Assembly, in keeping with its previous practice, will restrict its comments to overall policy issues and the MASP areas. The examination will look at macro issues in the MASP and will not do an in-depth technical analysis of individual zoning proposals.

(i) MASP MA 2

The Assembly note that the Land Use Zoning Matrix has been amended to include nursing home/ retirement home/sheltered housing. This is welcomed by the Assembly, but it does not actually zone land as required by RPO 7.14.

(ii) MASP MA3-8

These proposals relate to developments in areas at known risk of flooding and brings clarity to landowners and developers.

The Assembly note that the amount of residential lands zoned in Baile an Chlair, Bearna and Oranmore could be increased by 8, 2 and 2.5 Ha. respectively and there could be an equivalent decrease in Oranmore. In the event that these proposed MAs are accepted, how will their impact on the core strategy table be accommodated?

The Area Plans for Briarhill and Garraun have also proposed increases in residentially zoned lands, which also may have an impact on the core strategy table.

Conclusion

The Assembly consider that the majority of the proposed MAs do not create any consistency issues with the RSES. The instances where there are concerns have been outlined above and for convenience are recorded below in the form of recommendations and observations

Recommendations to achieve Consistency with RSES

1. Population figures in the core strategy table to reflect that the increases for key towns is 30% by 2040, and the 2028 figure takes this into account.
2. The core strategy table be revised to reflect balanced development between urban and rural areas and meet the requirements of NSO3 and RPO 7.17.
3. MA 5.1 to be modified to provide for the preparation of a masterplan for the airport site for employment, community and residential uses, instead of being solely for employment uses.

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4. That more information be provided to explain the potential exclusion of the Tuam and Ballinasloe areas for the siting of waste infrastructure.

Observations

1. Consider the inclusion of an urban fringe for Ballinasloe
2. Renovation of dwellings would get a preference for modern energy efficient units
3. Sites as well as An Spideail would be identified for affordable housing
4. Data on WWTPs headroom capacities be included in final plan
5. Density Typology will precede and inform forthcoming LAPs
6. MA 6.20: Suggest wording reflect it relates to New Accesses directly onto National Roads and will not apply to developments with indirect access via the regional and local road network that accesses national roads.

The Assembly acknowledge the extensive work undertaken by Galway County Council in preparing the Development Plan. The Assembly wish to thank the council for the opportunity given to engage in the process and we are available should any clarification on the submission be required.

Mise le meas,

David Minton
Director

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