



Senior Planner,
Planning Department,
City Hall,
College Road,
Galway,
H91 X4K8.

3 February 2023

via email: devplan@galwaycity.ie.

RE: DRAFT DIRECTION TO GALWAY CITY DEVELOPMENT PLAN 2023-2029

A chara,

I refer to your notification of 18th January 2023 in respect of the above Draft Direction and the Northern and Western Regional Assembly wish to thank you for providing the opportunity for it to make this submission.

There are two parts to the Draft Direction; the first is the reinstatement of 14 parcels of land that were proposed to be Zoned as R or R2 in the Proposed Material Alterations, back to Agriculture or Agriculture and High Amenity as provided within the Draft Development Plan. These parcels are widely distributed throughout the plan area and are generally peripheral to the densely developed areas of the city. The reasons for their selection for development can be categorised as infill development or for satisfying development intentions for members of the landowners family. In previous submissions, the Assembly considered many of the issues in this part of the Draft Direction and maintained that many of the material alterations were small scale interventions that did not have regional implications. However, there are a number of proposals where significant areas (greater than 1Ha.) were earmarked for low density residential development; the Draft Direction indicates that these areas would lose their proposed status. The Assembly agrees with the Draft Direction as the provision would be inconsistent with RPOs in respect of compact development, prioritising development in areas already serviced and development in areas subject to flooding. It would therefore support the Draft Direction in respect of these lands.

There is one area - A.4 Coolagh Road - on which the Draft Direction indicates that the zoning revert to Agriculture and High Amenity from Industrial and commercial use. A large proportion of these lands are brownfield and the prospect of them being utilised for agriculture is not immediately obvious.

The second part of the Draft Direction comprises the removal of proposed residential zoning. Rather like the first part, the proposals comprise areas for single houses and for low density residential development. It differs significantly from the first part in that it does not propose any zoning

Northern & Western Regional Assembly
The Square, Ballaghaderreen, Co. Roscommon
Tionól Réigiúnach an Tuaiscirt agus an Iarthair
An Chearnóg, Bealach an Doirín, Co. Ros Comáin

+353 (0)94 9862970

+353 (0)94 9862973

info@nwra.ie

following removal. It creates parcels of 'white land' throughout the plan area. The implication of this are twofold; the City Council has not created any white land within the plan and it therefore has no objectives/policies published for the specific development of such lands. Secondly, the creation of such designation moves away from plan led development and creates unnecessary uncertainty and would not be fully consistent with RPO 3.6.14 – which supports the retention of existing agricultural land within the MASP unless zoned for alternative purposes.

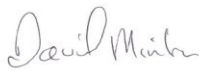
It may be preferable for the lands to be zoned, having regard to the contiguous land uses and in a manner that realises the spirit of the Draft Direction. The Assembly consider that in the circumstances, the City Council may be well placed to examine zoning for the 'white lands' and to recommend appropriate zonings to the Minister for same. The examination could take full account of environmental issues and document them for the Minister's consideration – which would ultimately result in a better plan for the City.

In its submission on the proposed material amendments, the Assembly was of the opinion that the plan would generally increase the levels of consistency with the RSES and it supported all those which had or dealt with regional issues.

In conclusion, the Assembly support the Draft Direction as set out in part 1, where larger areas are proposed to revert to the Draft Plan zoning. The Draft Direction in part 2 proposes that lands remain un-zoned and whilst the Assembly also support this aspect of the Draft Direction, it is suggested that, as an alternative, consideration be given by the planning authority to recommend an alternative appropriate zoning to the Minister for consideration in the manner outlined above.

I hope that the above is of assistance in consideration of the next steps. Mise

le meas,



David Minton
Director

Northern and Western Regional Assembly
The Square, Ballaghaderreen, Co Roscommon

 [+353 \(0\)94 986 2970](tel:+353(0)949862970)  [+353 \(0\)94 986 2973](tel:+353(0)949862973)  info@nwra.ie