



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

16th July 2026

Senior Planner,
Planning Department,
City Hall,
College Road,
Galway,
H91X4K8.

**Re: Proposed Material Alterations to Proposed Variation No. 2 to the Galway
City Development Plan 2023-2029**

A chara,

Thank you for your authority's work in preparing the Material Alterations (material alterations) to Proposed Variation No. 2 (proposed Variation) to the Galway City Development Plan 2023-2029 (Development Plan).

As Galway City Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is to evaluate and assess statutory plans to ensure consistency with legislative requirements and national and regional planning policy. The Office has evaluated and assessed the material alterations to the proposed Variation under the provisions of sections 31AM(1) and 31AM(2) of the Planning and Development Act 2000, as amended (Act). This submission sets out the outcome of that assessment¹.

In this context, the submission includes recommendations and observations. Recommendations arise where the Office identifies clear inconsistencies with

¹ Chapter 5 of Part 3 of the Planning and Development Act 2024, which relates to the preparation of development plans and variations by planning authorities and the assessment by the Office, was commenced on 31st December 2025. However, section 69(2) provides that the variation of a development plan under section 13 of the Act of 2000 shall continue under that Act after the repeal of section 13 of the Act of 2000.

legislative provisions or policy frameworks and are intended to be addressed to ensure compliance. Observations highlight areas where further clarification, justification, or refinement would strengthen the plan. The submission may also include advice to support the proper planning and sustainable development of the area.

1. Overview of submission on proposed material alterations

The material alterations to the proposed Variation relate to lands that were the subject of a Ministerial Direction issued on 3rd May 2023, which required the Planning Authority to remove specific zoning objectives from the Development Plan, leaving the affected lands unzoned.

The proposed Variation sought to assign Agriculture (A) zoning to nine of the affected sites and Agriculture High Amenity (G) zoning to the remaining four sites. The Office accepted this approach and did not make any recommendations or observations in its submission on the proposed Variation.

The material alterations now propose to rezone seven of the 13 sites, including five residential zonings at Cappagh Road and Roscam, and two amendments from Agriculture High Amenity (G) to Agriculture (A).

The Office does not, however, support the proposed residential zonings at Cappagh Road and Roscam as these lands remain peripheral, inadequately serviced, and reliant on private car travel. Their zoning would therefore undermine the compact, sequential and plan-led growth strategy advanced through Variation No. 3 to the Development Plan.

The Office also raises a flood risk concern relating to an unmapped watercourse located to the west of Cappagh Road (site 1).

In addition, no planning justification has been provided for the proposed amendments from Agriculture High Amenity (G) to Agriculture (A). The proposed changes would result in isolated pockets of Agriculture zoning within a wider High Amenity area, without a clear planning rationale. The Office therefore recommends that the Planning Authority reconsider these material alterations to ensure a coherent zoning framework and development strategy.

The following recommendations set out below are intended to support the Planning Authority in finalising the proposed Variation and ensuring its effective implementation:

Subject	Recommendation	Observation
Residential land use zonings - Compact growth	MA Recommendation 1	-
Agriculture High Amenity lands	MA Recommendation 2	-
Flood risk management	MA Recommendation 3	-

2. Residential land use zoning - Compact growth

The material alterations include five proposed residential zonings, which were previously subject to the Ministerial Direction to delete a residential zoning objective. Four of these sites are located in the Roscam area, and one on Cappagh Road some 1.5km beyond the junction with the Western Distributor Road.

By way of context, the Office notes that there does not appear to have been any material change in either the level of infrastructure provision or the peripheral location of the Cappagh Road and Roscam lands since the Ministerial Direction was issued in May 2023.

In addition, Variation No. 3 to the Development Plan has zoned significant additional lands for residential development to support the implementation of the NPF Implementation: Housing Growth Requirements (2025). These lands are strategically located within the existing urban structure and represent a positive approach to facilitating the compact, sequential, and integrated growth of Galway City, and the approach of the planning authority was welcomed by the Office. The proposed zoning of the Cappagh Road and Roscam lands would, however, undermine this plan-led approach by directing development towards less sustainable peripheral locations.

In relation to Cappagh Road (site 1), the Office notes that the material alteration seeks to change the zoning objective from Agriculture (A) to Residential (R). The

lands are located on the periphery of Galway City within the rural hinterland and are surrounded by agriculture zoned land. The proposal would result in leapfrogging more centrally located undeveloped and unzoned lands and would not support a compact and sequential pattern of growth.

In addition, the lands are not served by wastewater infrastructure and are located within a constrained rural road network that lacks footpaths, public lighting, and adequate access to active travel and public transport. As a result, development of the site would facilitate a car-dependent pattern of development.

Having regard to these constraints and noting the Strategic Environmental Assessment (SEA) findings that identified there would be a relatively high level of unnecessary residual negative effects which would not be easily mitigated and/or avoided, the Office considers that the proposed residential zoning would not support a compact, sequential and sustainable pattern of growth. The Office recommends therefore, that the Variation is made without the residential zoning objective at this location.

The material alterations also seek to change the zoning objective of four sites in the Roscam area to residential (R and R2) from either Agriculture (A) or Agriculture High Amenity (G).

These lands are referenced as Roscam 9b, 10a, 10b and 10c and are located in an environmentally sensitive area in close proximity to Galway Bay and as above the Office notes the SEA findings that there would be a relatively high level of unnecessary residual negative effects which would not be easily mitigated and/or avoided. The lands in question are similarly peripherally located, are not served by wastewater infrastructure, and are located within a constrained rural road network that lacks footpaths, public lighting, and adequate access to active travel and public transport. As a result, development of the lands would facilitate a car-dependent pattern of development.

Notwithstanding the inclusion of specific objectives to restrict the scale of the development on each of these sites, the Office remains of the view that the proposed residential zonings would not support a compact, sequential and sustainable pattern

of growth. The Office recommends, therefore, that the proposed Variation is made without these residential zoning objectives in Roscam.

MA Recommendation 1 - Residential Land Use Zonings

To ensure compact and sequential growth and support co-ordinated and sustainable development of communities, and having considered the following:

- NPO 8 of the NPF to ensure compact and sequential patterns of growth;
- NPO 103 of the NPF for the co-ordination of housing and infrastructure delivery;
- NPO 43 of the NPF to prioritise the provision of new homes at locations that can support sustainable development;
- NPO 37 of the NPF by prioritising walking and cycling accessibility to proposed developments;
- RPOs 3.1 and 3.2 of the RSES to deliver compact growth;
- RPO 6.29 of the RSES (deliver a high level of priority and permeability for walking, cycling and public transport modes);
- the Climate Action Plan 2025 (reducing vehicle kilometres travelled);
- the Climate Action and Low Carbon Development Act 2015, as amended (mandatory target to reduce greenhouse gas emissions by 51%); and
- the National Sustainable Mobility Policy (2022) (reducing vehicle kilometres travelled),

the Office recommends that the Planning Authority make the Variation without the following material alterations:

- (i) Cappagh Road (site 1), to rezone lands from Agriculture (A) to Residential (R);
- (ii) Roscam 9b, to rezone lands from Agriculture High Amenity (G) to Residential (R);
- (iii) Roscam 10a, to rezone lands from Agriculture (A) to Residential (R);

- (iv) Roscam 10b, to rezone lands from Agriculture (A) to Residential (R);
- (v) Roscam 10c, to rezone lands from Agriculture (A) to Residential (R2); and
- (vi) the relevant associated Specific Objectives for Roscam 9b, Roscam 10a and Roscam 10b.

3. Agriculture High Amenity lands

The Office has further concerns regarding two zoning amendments included as part of the material alterations, which propose to change the zoning objective from Agriculture High Amenity (G) to Agriculture (A). Lands designated as Agriculture High Amenity (G) in the Development Plan are intended to support agricultural uses while affording enhanced protection to areas of high visual importance and landscape value on the city's fringes. This differs from the Agriculture (A) zoning objective, which is generally applied to less visually sensitive rural areas.

In relation to Coolagh Road (site 3), the Office acknowledges the presence of residentially zoned lands to the east. However, the lands on the western side of the public road, including the subject lands, are otherwise zoned Agriculture High Amenity (G). The planning basis for applying a different zoning objective to this parcel has not been clearly set out in the material alterations documentation.

Similarly, the Roscam 9a lands are bounded to the north, west and south by Agriculture High Amenity (G) zoning. While the Chief Executive's Report on submissions refers to the capacity of these lands to accommodate additional development, this does not, in itself, explain the appropriateness of changing the zoning objective or the implications for the wider high amenity landscape setting.

The Office considers that further justification would be required to demonstrate that these zoning amendments are consistent with the overall landscape and amenity strategy of the Development Plan. In the absence of such justification, the proposed amendments may result in an incremental erosion of the wider high amenity area and its associated landscape functions. The Office therefore recommends that the Planning Authority review these proposed zoning amendments and, should a robust planning rationale not be demonstrated, consider omitting the material alterations from the proposed Variation.

MA Recommendation 2 - Loss of Agriculture High Amenity lands

Having regard to the protection of high-value amenity lands, greenbelts and green spaces, and having considered:

- NPO 83 of the NPF to identify and strengthen the value of greenbelts and green and blue spaces at a regional, city and local scales, to enable enhanced connectivity to wider strategic networks and prevent coalescence of settlements and to allow for the long-term strategic expansion of urban areas; and
- RPO 5.2(a) of the RSES to protect, manage and conserve the quality, character and distinctiveness of our Landscapes,

the Office recommends that the Planning Authority review these proposed zoning amendments and, if a robust planning rationale is not demonstrated, make the Variation without the following material alterations:

- (i) Coolagh Road (site 3) to rezone lands from Agriculture High Amenity(G) to Agriculture (A); and
- (ii) Roscam 9a to rezone from Agriculture High Amenity (G) to Agriculture (A).

4. Flood risk management

The Office notes there is an unmapped watercourse in the vicinity of lands at Cappagh Road (MA 1), which has not been included in either the National Catchment Flood Risk Assessment and Management (CFRAM) or the National Indicative Fluvial Mapping (NIFM) programmes. As a result, flood risk extents have not been established for this watercourse.

Where unmapped watercourses are present, stages 1 and 2 assessments should be undertaken to establish the level of risk. Where insufficient information is not available to define flood zones, a stage 3 flood risk assessment may be required. As the Planning Authority is proposing a residential zoning amendment to these lands, a risk assessment is required to establish if a stage 3 flood risk assessment is needed to inform the land use zoning and Strategic Flood Risk Assessment. An evaluation of site-specific flood risk assessments may also assist with defining flood zones.

Accordingly, the Planning Authority should address this issue in relation to the amended material alterations at the residential zoning site 1 at the lands at Cappagh Road.

MA Recommendation 3 - Flood Risk Management

Having regard to the need to consider flood risk management, and having considered:

- NPO 78 of the NPF to avoid inappropriate development in areas at risk of flooding;
- RPO 3.10 of the RSES to avoid inappropriate development in areas of risk of flooding and assess flood risk in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines); and
- the Flood Guidelines,

the Office recommends that the Planning Authority is to:

- (i) undertake risk assessments to determine if stage 3 flood risk assessments are required on the proposed Residential (R) zoning at Cappagh Road site 1, which is located in the vicinity of an unmapped watercourse; and
- (ii) if following a stage 3 flood risk assessment, lands are identified in Flood Zone A or B the flood risk should be appropriately assessed in accordance with the Flood Guidelines, and the land should not be zoned for residential development unless it can be demonstrated that the zoning would be in accordance with those guidelines.

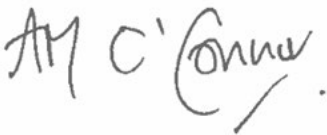
5. Summary

The Office requests that the Planning Authority addresses the recommendations set out above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 13 of the Act must summarise these recommendations and the manner in which they will be addressed.

At the end of the process, your authority is required to notify this Office **within five working days** of the decision of the Planning Authority in relation to the proposed Variation. Where your authority decides not to comply with the recommendations of the Office or otherwise makes the plan in such a manner as to be inconsistent with the recommendations made by this Office, then the Chief Executive shall inform the Office and give reasons for this decision.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through plans@opr.ie.

Is mise le meas,



Anne Marie O'Connor

Deputy Regulator and Director of Planning Policy Implementation

Designated Public Official under the Regulation of Lobbying Act 2015
