

28 August 2020

Senior Planner, Planning Department, Galway City Council, College Road, Galway, Co. Galway

Re: Proposed Variation Nos. 5 & 6 of the Galway City Development Plan 2017-2023

A chara,

Thank you for your authority's work in preparing Proposed Variation Nos. 5 & 6 of the Galway City Development Plan 2017-2023 (the proposed variations).

In accordance with the provisions of section 31AM of the Planning and Development Act 2000, as amended (the Act), the Office is obliged to evaluate and assess development plans and variations of development plans in the context of certain statutory parameters including:

- Matters generally to be contained in a development plan (section 10) and, in particular, section 10(2)(n) in relation to climate change;
- Consistency with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy for the Northern and Western Region (the RSES);
- Ministerial guidelines issued under section 28;
- Ministerial policy directives issued under section 29, and,
- Such other legislative and policy matters as the Minister may communicate to the Office in writing.

The submission below has been prepared to provide a high-level input to your authority in finalising the proposed variations of the plan.

Proposed Variation No.5

The purpose of proposed variation no.5 of the Galway City Development Plan 2017-2023, is to align the plan with the National Planning Framework (NPF) and Regional Spatial and Economic Strategy for the Northern and Western Region (the RSES) in accordance with Section 11(1)(b)(iii) of the Act.

The proposed variation amends the population target figures in the core strategy of the Galway City Development Plan 2017-2023 (the plan) and the related housing target figures to reflect the targets set out for the city in the RSES.

The Office acknowledges that a formal review of the Galway City Development Plan 2017-2023 will commence in January 2021, as such the appropriate method of incorporating the NPF and the RSES into the development plan is by variation of the development plan.

The Office welcomes the proposed variation and is generally satisfied that it will align the plan with the NPF and RSES.

1. Matters within the scope of section 10 and section 10(2)(n)

The Office confirms that no issues arise in this regard.

2. Consistency with national and regional policy

Compact Growth & Urban Regeneration

In order to enhance the plan's alignment with National Policy Objectives (NPOs) of the NPF¹, the Regional Policy Objectives (RPOs) of the RSES², and the Galway Metropolitan Strategic Area Plan (MASP) in relation to compact growth, housing, and regeneration, the Office provides the following comments and advice.

It may be appropriate to make more specific reference, within pages 6 and 7 of the proposed variation no.5 report, to the growth of the strategic development areas reflecting the compact growth / urban consolidation objectives with regard to consolidation and re-intensification of infill, brownfield and underutilised lands within Galway City and its suburbs.

In particular, the Office considers that an implementation strategy and measures for achieving national and regional targets would be warranted. Compact growth is a pivotal National Strategic

¹ NPO 3a, NPO 3b

² RPO 3.6.2, RPO 3.6.3

Outcome (NSO) of the NPF³. To achieve the compact growth and urban consolidation targets of 50% for Galway city will require reusing of large and small 'brownfield' land, infill sites, and underutilised lands at locations that are well served by existing and planned public transport.

The NPF particularly highlights the need to identify infill and regeneration opportunities to intensify housing and employment development throughout inner suburban areas. The benefits of such an approach for Galway City are multiple and include the potential to achieve more homes and jobs in the city through high quality and high density mixed-use development, continued support of existing services and infrastructure, and facilitating people to live and work within a reasonable distance.

Having regard to the national and regional policy emphasis on compact growth / brownfield development, the Office considers it prudent, notwithstanding the forthcoming Development Plan review, that the proposed variation would make a stronger reference to compact growth targets for Galway City and suburbs, and to the RPOs to achieve compact growth as contained in the RSES⁴.

Furthermore, and related to this pivotal issue, it should be noted that the RSES⁵ has identified the need to establish a collaborative approach with other regions identified for strategic growth areas.

Observation no.1

- a. Having regard to core policy objectives in the National Planning Framework and the RSES which relate to urban regeneration / renewal and brownfield redevelopment, the Office advises that the proposed variation no.5 makes more a direct reference to compact growth and urban consolidation in Galway City and suburbs in the context of implementation and monitoring measures to ensure alignment with national and regional targets.
- b. The Office considers it prudent that, in the interest of aligning policy in Galway City and suburbs with the Galway MASP and national policy, the proposed variation no.5 includes a policy objective to support the establishment of a collaborative approach, in achieving compact growth, with other regions identified for strategic growth areas.

³ NSO 1

⁴ RPO 3.3, RPO 3.6, RPO 3.7

⁵ RPO 3.6.1

Transport & Infrastructure

The role of the Galway MASP in counterbalancing growth in the greater Dublin region is a fundamental objective in the NPF⁶. Proposed public transportation infrastructure is an integral component in the Galway MASP in achieving a critical mass, and the alignment of infrastructure with investment is a significant feature of government policy⁷.

The Galway Transportation Strategy (GTS) provides a framework for planning and delivery of a transport structure in the Galway MASP which will support compact smart growth and promote higher development densities.

The RSES supports the provision and promotion of dual-tracking from Athenry to Galway's Ceannt station⁸. The Galway City Development Plan 2017-2023 makes reference to this for passenger services and potential freight services from Galway port, however there is no policy objective that supports such longer term aims for the enhancement of the city's transportation connectivity. The Office considers a broad level of support for this policy objective would be warranted, given its significance for land-use planning in the Galway MASP.

In addition, the Office notes that within the written statement of the proposed variation no.5 report, there is a reference within Chapter 3 to 'Amend Policy Public Transport 3.5'. This policy relates to the redevelopment of Ceannt Station, however it would appear that this stated policy objective is not in situ within the current Galway City Development Plan 2017-2023.

Notwithstanding the above, the policy objectives for the redevelopment of Ceannt station, a key regeneration area of the Galway MASP⁹ and a national planning policy objective, is adequately referenced within the current City Development Plan 2017-2023 under Specific Objectives 3.10 of the plan.

Observation no.2

In order to further enhance the alignment between the Galway City Development Plan, 2017-2023 and the RSES, the planning authority is advised to consider the inclusion of a specific policy in the variation to underscore and support RPO 3.6.9 and RPO 6.12 in relation to dual-tracking from Athenry to Galway's Ceannt station.

⁶ NPO 2a, NPO 3b, NPO 7, NPO 8

⁷ National Planning Framework, 2018, and the National Development Plan, 2018 – 2027

⁸ RPO 3.6.9, RPO 6.12

⁹ RPO 3.6.4

Observation no.3

The planning authority is advised that reference within proposed variation no.5 to Section 3.5 'Amend Policy 3.5 Public Transport' should be omitted from the written statement of the proposed variation as this policy statement is not contained within the Galway City Development Plan 2017-2023 and is not subject to a variation in accordance with Section 13 of the Act.

Climate Action

The Office welcomes the policy variation under Section 9.2 'Climate Change Resilience', which relates to the Climate Adaptation Strategy 2019-2024. The planning authority will be aware that the Office's evaluation of development plans, and variations of same, is required under section 31AM(2)(a) to address, in particular, matters within the scope of section 10(2)(n) of the Act.

Having regard to the Climate Action Plan 2019 and to the objectives of the NPF¹⁰ and the RSES¹¹, the transition to a low carbon economy and the overall reduction in carbon emissions will become a fundamental issue in climate change resilience. The Office would acknowledge and advise that this will be a core consideration in preparation in the upcoming review of the Galway City Development Plan.

3. Policy directives issued under section 29

The Office confirms that no issues arise in this regard.

4. Other legislative and policy matters as the Minister may communicate

The Office confirms that no issues arise in this regard.

Proposed Variation No.6

Proposed variation no.6 proposes to insert a specific objective to Section 11.2.2 of the Galway City Development Plan, 2017-2023. The specific objective 'RA lands at Cappagh Park. The Council will consider the development an Aquatic Sports and Fitness Centre adjoining and linked with the existing community centre' would augment sporting facilities in the city and enhance the quality of life offering to an expanding population. The Office welcomes this variation and no issues arise in this regard.

¹¹ RPO 5.1, RPO 6.33

¹⁰ NPO 53, NPO 54

Summary

Accordingly, the Office broadly supports the proposed variations and urges your authority to finalise same, having regard to the observations set out above, and has no specific recommendations to make under the provisions of section 31AM(3)(a) of the Act.

Your authority is required to notify this Office within 5 working days of the making of the variation and send a copy of the written statement and maps as made, in accordance with section 31AM(6) of the Act.

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 the undersigned or at plans@opr.ie.

Yours sincerely,

Anne Marie O'Connor

AM C'Grun

Deputy Regulator and Director of Plans Evaluations, Office of the Planning Regulator

087 689 4771

AnneMarie.OConnor@opr.ie