



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

10 September 2020

Administrative Officer,
CDP Review,
Forward Planning Policy Unit,
Aras an Chontae,
Prospect Hill,
Galway,
H91 H6KX.

Re: Issues Paper for the Galway County Development Plan 2022-2028

A chara

Thank you for your authority's work in preparing the *Galway County Development Plan 2022-2028 Issues Paper*. The Office acknowledges and welcomes the publication of this paper and your authority's work more broadly in advancing the review of the Galway County Development Plan (the plan).

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 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 *Northern and Western Regional Assembly Regional Spatial and Economic Strategy (RSES)*;
- Ministerial guidelines 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 Office has set out some comments for your authority to consider in formulating the draft plan.

These comments are offered without prejudice to any statutory observations and recommendations as may be forthcoming from the Office at future stages of the plan making process, and do not affect the obligation on your planning authority to comply with the relevant legislative requirements.

Consultation strategies

The Office commends the planning authority for the innovative methods used to inform the public about the review of the plan and for making the Issues Paper available in an e-book format and in Irish.

In particular, the Office welcomes the use of social media and short videos which draw attention to specific issues and their relevance to County Galway.

The Office would appreciate feedback on the effectiveness of the planning authority's consultation approach in due course.

Core Strategy & Settlement Strategy

The formulation of the Core Strategy in line with section 10 of the Act is the most significant element in developing the planning authority's draft development plan.

The NPF and the RSES in addition to relevant specific planning policy requirements (SPPRs) specified in Ministerial guidelines under section 28 of the Act will be key determinants in making the Core Strategy for the planning authority's functional area. The Office understands that forthcoming updates to the *Development Plan Guidelines* by the Department of Housing, Planning and Local Government, in addition to the publication of guidance in relation to Housing Need Demand Assessment, will provide enhanced guidance for the preparation of development plans and their core strategies.

One of the National Strategic Outcomes of the NPF is 'compact growth' which, from an urban development perspective means, *'...we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages and ensuring that, when it comes to choosing a home, there are viable attractive alternatives available to people'*¹.

National Policy Objective (NPO) 3c has a target to *'Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints'*, while NPO 3b has a higher delivery target of 50% for Galway City and its suburbs which applies to the Galway Metropolitan Area Strategic Plan (MASP)².

1 Page 139 of the NPF

2 Page 159 of the NPF

In this regard, the Office agrees that *'Growing the metropolitan area and other settlements within the County to achieve Compact Growth'*³ is a key challenge that the planning authority must address in the forthcoming development plan.

As the planning authority will be aware, the NPF has a target population for County Galway (including Galway City) of 300,000 – 308,500 by 2026 and 322,000 – 334,500 by 2031. This represents a population increase for the city and county of 42,000 – 50,500 people by 2026 above its combined 2016 census figure of 258,000.

The NPF also contains a longer term target population increase for Galway City and suburbs of 40,000 – 45,000 people to at least 120,000 by 2040.

The overall population target for the county in the Core Strategy is required to be consistent with the NPF Implementation Roadmap 2018, with the projected growth of settlements also required to be consistent with the policy objectives of the NPF and the RSES including the Galway MASP concerning the distribution of population growth.

In this regard, the Office advises that a significant proportion of the county's future population growth will need to be allocated to the Key Towns of Ballinasloe and Tuam, MASP area and larger settlements consistent with the RSES which identifies Athenry as a location with *strategic development potential of a regional scale*⁴.

Section 3.6.3.1 - *Population and Housing* of the RSES has the following targets for the MASP area:

1. The population of Galway MASP to grow by 27,500 to 2026 and by a further 14,500 to 2031, with the population of the city and suburbs accommodating 23,000 to 2026 and a further 12,000 to 2031.
2. Deliver at least half (50%) of all new homes that are targeted within the MASP to be within the existing footprint of the built-up area.

The Office notes that the MASP includes the settlements of Oranmore, Bearna and Claregalway (Baile Chláir), which between them have approximately 54 hectares of land available for housing⁵, and a large rural hinterland beyond the built up footprint of Galway City. In this regard, the planning authority's attention is also drawn to RPO 3.6.14 which states:

'The Assembly supports the retention of existing agricultural land within the MASP boundary for that purpose unless it is subject to objectives for the zoning of lands for particular

3 Page 8 of the Issues Paper

4 Page 106 of the RSES

5 Page 47 of the RSES

purposes (whether residential, commercial, industrial, recreational, as open space or otherwise in a statutory plan). Only in exceptional circumstances would it support the development of new residential, industrial or commercial uses on unserviced greenfield sites and these shall be defined through the statutory plan-making process.'

It will therefore be essential that the Galway County Development Plan and the Galway City Development Plan contain an integrated and coordinated planning policy framework for Galway City and its rural hinterland which is consistent with the vision and targets contained in the MASP and the RSES.

In this respect, the Office notes that the current settlement hierarchy will need to be amended for consistency with the NPF and the RSES. In particular, the hierarchy will need to reflect the designation of Ballinasloe and Tuam as Key Towns and Athenry as a location with *strategic development potential of a regional scale*. Further, the current designation of Loughrea, Oranmore, Athenry, Gort, Clifden, Portumna, Moycullen (Maigh Cuilinn) as Key Towns should be changed to avoid confusion with the status given to Key Towns in the RSES, and the population growth in the Core strategy should reflect a settlement hierarchy that is consistent with the RSES.

The Office will provide further practical advice and technical support in the working out of the Core Strategy parameters above and within our statutory remit as the planning authority may require.

Urban Regeneration

The NPF recognises that the regeneration and rejuvenation of cities, towns and villages of all types and scale can play a role in making stronger urban places and contributing to compact growth.

Acknowledging that Key Towns and the MASP area are targeted to have a significant population increase, the development plan and LAPs will need to prioritise the development of opportunity sites close to town centres in the first instance.

The NPF supports the use of performance based standards⁶ for infill / brownfield development stating:

'In particular, general restrictions on building height or universal standards for car parking or garden size may not be applicable in all circumstances in urban areas and should be replaced by performance-based criteria appropriate to general location, e.g. city/town centre, public transport hub, inner suburban, public transport corridor, outer suburban, town, village etc.'

In this regard, there is an opportunity to review the current development management standards in Chapter 13 of the plan, in particular the sections dealing with standards for residential and apartment development, to ensure they are consistent with the relevant and any updated section 28 guidelines.

Key Towns

The designated Key Towns of Tuam and Ballinasloe are targeted for a 30% increase in population to 2031. This would increase Ballinasloe's 2016 population from 6,662 to circa 8,600 people and Tuam's 2016 population from 8,767 to circa 11,300 people.

As outlined in the RSES, Ballinasloe is located within one of the county's Strategic Development Corridors and the town is the main economic driver for the east of the county with strong links to Athlone. In this regard, it is important that the policies in the forthcoming plan capitalise on the town's strategic location and strengths such as its jobs ratio of 1.381.

The development plan and subsequent Local Area Plan (LAP) for Ballinasloe will need to provide a clear direction for the implementation of the *key future priorities* identified in the RSES, in particular those relating to sustainable land use and transport solutions and promoting brownfield development on sites such as the St Brigid's Hospital.

As outlined in the RSES, Tuam plays an important education and employment role in the north of the county, and has now benefits from reduced journey times to airports and major centres. In this regard, it is important that the policies in the forthcoming plan capitalise on the town's strengths such as its jobs ratio of 1.131 and clearly demonstrate how the planning authority will implement the *key future priorities* identified in the RSES in particular smarter travel initiatives. This may require a review and variation of the *Tuam Local Area Plan 2018 – 2024* to ensure consistency with the policies in the higher level plans.

Regional Policy Objective (RPO) 6.27 supports the collaborative preparation of a Local Transport Plan (LTP) for Ballinasloe and Tuam led by the planning authority in conjunction with the National Transport Authority (NTA) and other stakeholders, and for the LTP to inform the LAP. In this regard, the Office advises the planning authority to consult with the NTA, Transport Infrastructure Ireland (TII) and Roscommon County Council (in respect of Ballinasloe) regarding the preparation of the LTP and any LAP prepared for both Key Towns.

Local Area Plans

The Office notes that a number of the existing LAPs are outdated e.g. Oranmore LAP, will have expired or be close to expiring e.g. Portumna LAP by the time the next development plan is adopted.

In light of the number of existing LAPs for settlements of various scale across the county, the Office advises the planning authority to prioritise the preparation of LAPs for the Key Town of Ballinasloe (expires 2021), Athenry (notice deferred) and larger settlements within the MASP such as Oranmore.

The Office also advises the planning authority to limit the number of development plan objectives requiring the preparation of a LAP especially for the smaller towns / villages or where limited growth is anticipated having regard to section 19(1)(bb) of the Act. In this regard, the Office welcomes the statement on page 12 of the Issues Paper:

'It is now envisaged that certain Local Area Plans (Populations less than 5,000 persons) and settlement plans that had previous plans in situ will be incorporated into the new Plan.'

The Office can provide further advice to the planning authority on these matters if required.

Economic Development & Employment

The Office notes the diverse nature of the county's economic base and the importance of medical devices, ICT, agri-food and tourism in supporting economic development and employment.

The planning authority is reminded of the requirement in section 3.5 of the *Retail Planning Guidelines for Planning Authorities (2012)* to prepare a joint retail strategy with Galway City Council to inform the forthcoming development plan.

The current high jobs ratios in Ballinasloe and Tuam place both towns in a strong position to support sustainable growth. However, the Office notes that Moycullen, Oranmore and Bearnna have jobs ratios of 0.53, 0.438, 0.452 respectively which indicates high levels of outbound commuting from these settlements. The Office considers that this will be a key issue to address in the forthcoming plan.

Athenry is identified in the RSES as a location with *strategic development potential of a regional scale*, however its jobs ratio is 0.767. The Office notes that the town has an opportunity to grow its employment base as part of the Oranmore – Athenry Strategic Corridor and this will be an important issue for the plan to address.

The Office considers that the plan should be proactive in identifying sites or opportunities to support economic development and employment consistent with national, regional and local policies, and in particular the principles in the section 28 guidelines on retail planning⁷ and national roads⁸.

Transport & Infrastructure

The Office notes that the Galway Transport Strategy (GTS) has already been prepared and it will now be implemented as an objective of the Galway MASP. The GTS supports reduced congestion and car dependency through increased capacity of reliable and sustainable public transport and the promotion and facilitation of cycling and walking, which in turn promotes the reduction of greenhouse gas (GHG) emissions.

In view of GHG emissions from transport (which are second only to agricultural emissions in terms of national emissions⁹) and the energy use for transport (highest energy use by sector, accounting for 43% total final consumption in 2017), it will be essential for the planning authority to achieve a significant modal shift in the county in order to meet the requirements under section 10(2)(n) of the Act.

Therefore, the continued implementation of the GTS in partnership with the NTA and Galway City Council and other initiatives will play a key role in addressing this challenge. In this regard, the Office welcomes the intent of the planning authority to assess the county's green infrastructure and how it can be improved as part of the review of the plan.

In view of the above, the Office would encourage the planning authority to include modal shift targets to be achieved over the plan period, aligned to relevant implementation measures, in order to achieve meaningful improvements in GHG emissions and energy use in line with section 10(2)(n) of the Act.

A key issue for the next development plan is to ensure that policies protect the strategic function of national roads, maximise the benefits of existing and planned public transport investment and that planned improvements to the national road network are not eroded by a growth in demand for car travel, especially for short distances, in the absence of long term public transport infrastructure.

The plan should ensure that the route corridor planning and options for the N6 Galway City Ring Road, N59 Moycullen Bypass and N59 Oughterard – Maam Cross - Clifden are protected and that local policies and development management standards regarding access to national roads including

7 Guidelines for Planning Authorities Retail Planning (Apr 2012)

8 Spatial Planning and National Roads Guidelines (Jan 2012)

9 EPA: www.epa.ie/ghg/currentsituation/

exceptional circumstances are consistent with the *Spatial Planning and National Road Guidelines (2012)*.

Commitment to the proactive implementation of the *Design Manual for Urban Roads and Streets* (as revised in 2019) in the required locations, consistent with RPO 6.26, will also assist sustainable and active transport modes, in addition to improvement in the street environment and overall quality of life of urban areas and settlements of all sizes.

The NPF sets out a two-tier approach to land zoning referred to as the tiered approach to land zoning. In this regard, the planning authority's attention is drawn to the requirement of NPO 72a which states:

'Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.'

Further information regarding the above is provided in Appendix 3 of the NPF: *A Methodology for a Tiered Approach to Land Zoning*.

In respect of the provision of wastewater and water infrastructure, there is a need to work proactively with Irish Water to progress projects that deliver infrastructure for the county's settlements and support development in strategic development areas consistent with the NPF and RSES. In this regard, the Office notes that the East Galway Drainage Scheme is listed as one of a number of projects '*...necessary to deliver the growth model outlined in the RSES*'¹⁰.

Rural Development

The Issues Paper acknowledges the pressure for one-off housing and the role of the development plan in balancing that need against other objectives.

*'The County Development Plan will try to balance the need to accommodate rural generated residential development for a growing population, support communities and increased rural based commercial activities against the equally important need to protect its countryside from excessive and inappropriate development.'*¹¹

¹⁰ Page 223 of the RSES

¹¹ Page 14 of the Issues Paper

The Office notes from CSO data that 76.63% of the houses constructed in County Galway between 2011 and 2016 were one-off houses, and the county has the highest percentage of households living in this type of housing¹².

The RSES highlights the challenge and priority action for planning authorities in respect of the regeneration and revitalisation of the region's smaller towns, villages and rural areas¹³:

'The future role and function of our large network of smaller towns and villages across the region need to be re-imagined, addressing economic, physical and social decline issues. The regeneration of our smaller towns and villages is now a major priority action for our region, which provides an opportunity to address legacy issues and to turn around their fortunes ...'

Having regard to the above, it is important that the forthcoming plan provides the appropriate balance between policies supporting rural housing in appropriate locations and those that proactively address issues of town / village decline and compact growth. In this regard, the plan's policies will need to demonstrate consistency with NPO 19 and NPO 20 and, inter alia, RPO 3.3 which seeks to *'deliver at least 20% of all new housing in rural areas on brownfield sites'*¹⁴.

Furthermore, the plan will need to consider the practical implementation of appropriate policy objectives through suitable land activation approaches and proactive facilitation of the building of homes within the footprint of rural settlements through measures such as site acquisition and serviced sites consistent with NPO 18a and NPO 18b.

Such initiatives have the potential to alleviate pressure on the open countryside through provision of a desirable alternative to one-off housing for families who would like to reside close to the facilities, services and amenities available in rural villages and towns whilst maintaining ties to the wider rural community.

Strategic Flood Risk Assessment

The planning authority will be aware of the need to prepare a Strategic Flood Risk Assessment (SFRA) as part of the forthcoming draft development plan, consistent with *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)*.

In this regard, the Office advises against the use of information from the Office of Public Work's (OPW) Preliminary Flood Risk Assessment (PFRA) and arterial drainage benefitting land maps to inform the SFRA. The planning authority will need to take account of OPW Flood Relief Schemes

¹² <https://www.cso.ie/en/releasesandpublications/ep/p-cp1hii/cp1hii/od/>

¹³ Page 38 of the RSES

¹⁴ Page 38 of the RSES

and undertake adequate flood risk assessment to determine if there is sufficient information to inform zoning decisions or if further more detailed analysis is required.

Climate Action and Energy

The planning authority will be aware that the Office's evaluation of the plan 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 (CAP)* and to the objectives of the NPF and the RSES, the transition to a low carbon economy and the overall reduction in carbon emissions will become a central issue for planning policies during the preparation of the plan.

The Office endorses the statements on page 21 of the Issues Paper:

'County Galway must play its part in delivering on the climate change actions as per the CAP. This can be achieved by examining how best to provide for sustainable living across the County. This may be achieved by supporting large populations with sustainable transport services which would reduce the level of carbon emissions through reduction of private car usage....'

Regarding climate change mitigation measures pertinent to section 10(2)(n), section 6.2 – *Transport* and section 6.3 – *Transport Investment Priorities* (including RPOs 6.27, 6.28, 6.29, 6.30, 6.31 and 6.32) of the RSES are of relevance regarding the integration of land use and transport planning.

The Office notes that the existing Wind Energy Strategy will be replaced by a Renewable Energy Strategy and that the council is planning to replicate the Galway Wind Park in other parts of the county.

The promotion of renewable energy sources within the county in accordance with the section 28 *Wind Energy Development Guidelines* (2006), Circular Letter PL 5/2017: *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change and Wind Energy Development Guidelines 2006 – Update on Review (July 2017)*, or any replacement guidelines issued by the Minister, will also be critical to ensure Ireland meets its national targets and commitments to increase renewable energy supply and reduce greenhouse gas emissions.

In this regard, the attention of the planning authority is drawn, in particular, to the SPPR under the aforementioned interim guidelines. This requires, inter alia, that the planning authority indicate how the implementation of its development plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts).

Summary

In summary, the Office commends your authority for the preparation of this Issues Paper and for the innovative approach to engage and inform the local community.

The Office advises your authority to pay particular attention to the following issues in the formulation of the county development plan:

- National and regional objectives for population growth, compact growth and regeneration in determining the Core Strategy, including the settlement hierarchy for your functional area. In this regard, the Office advises that a significant proportion of the county's future population growth should be directed to Ballinasloe, Tuam, MASP and other key settlements such as Athenry. This settlement hierarchy should also inform the quantum of land zoned for residential development in other settlements, with the allowance allocated to the rural remainder.
- The coordination of economic development and employment with population growth which capitalises on strengths such as the high jobs ratio in Key Towns and addresses challenges such as high rates of commuting within and to the metropolitan area.
- The need to prioritise the preparation of a LAP for Ballinasloe informed by a LTP in tandem with the preparation of the development plan if possible.
- The inclusion of specific policies and implementation measures that encourage infill / brownfield development in the county's towns and the building of homes within the footprint of rural settlements. These policies and implementation measures should be specific, targeted, and measurable (i.e. include monitoring measures).
- The development of rural housing policies that are consistent with NPOs 19 and 20 of the NPF, and which distinguish between areas under strong urban influence and elsewhere, and support the regeneration of rural towns and villages by directing residential development to serviced areas and facilitating more sustainable transport patterns.
- The need for consultation with transport agencies including the NTA and TII, and neighbouring planning authorities, during the preparation of land use and transport plans, and to ensure that policies and development management standards regarding access to national roads including exceptional circumstances are consistent with the *Spatial Planning and National Roads Guidelines (2012)*.
- The promotion of sustainable settlement and transport strategies for urban and rural areas with measures to reduce GHG emissions, reduce energy usage and to adapt to climate

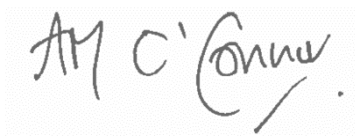
change. The plan should include targets for modal shift over the plan period aligned to specific implementation and monitoring measures.

- The promotion of renewable energy sources within the county in accordance with the relevant section 28 guidelines.

The Office looks forward to reviewing the plan and is committed to continued positive engagement with your authority in the implementation of national and regional policies at county and local level.

Please feel free to contact 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 by emailing plans@opr.ie.

Yours sincerely,

A handwritten signature in black ink that reads "AM O'Connor". The signature is written in a cursive style with a horizontal line under the "O" and a diagonal slash under the "n".

Anne Marie O'Connor
Deputy Planning Regulator