



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

5th March 2021

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

Re: Issues Paper for the Galway City Development Plan 2023 – 2029

A chara,

Thank you for your authority's work in preparing the Issues Paper for the review of the Galway City Development Plan (the plan). The Office acknowledges and welcomes the publication of this paper and your authority's work, more broadly, in advancing the review of 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 *Regional Spatial and Economic Strategy for the Southern Regional Assembly* (the 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 broad areas for your authority to consider in formulating the draft development plan.

These observations are offered without prejudice to any observations and recommendations as may be forthcoming from the Office at future stages of the plan making process, and do

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not affect the obligation on your planning authority to comply with the relevant legislative requirements, or to be consistent with the policy context of the higher order plans, strategies and Ministerial guidelines.

1.0 Overall approach to Issues Papers

The Office appreciates the challenge in presenting a succinct document, with which to engage the public that also addresses the full national and regional policy context at the city scale.

The range of topics addressed is comprehensive and relevant and the document provides an appropriate overview of the policy context within which the development plan must be made. In addition, the document is well set out, being visually engaging, accessible and, at 56 pages, is reasonably concise in view of the myriad of issues addressed.

The planning authority is commended for providing an executive summary of the issues paper. An executive summary is a useful starting point for engaging with the public and setting out the key issues. Consequently, this section may have benefited from some expansion with some further detail following the key headings of the paper.

The Office acknowledges the difficulties for planning authorities in carrying out effective public consultation on its plan review during the current Covid-19 restrictions. Overall the planning authority is to be commended for carrying out comparatively extensive consultation. Other techniques used to extend the reach and quality of engagement by planning authorities include outdoor advertising of the consultation and the use of video material and online opinion surveys through the Council's website, all of which can further aid the consultation process.

The number of webinars (14no.) arranged by Galway City Community Network (with planning staff in attendance) based on a range of themes, locations and population cohorts, is impressive. It is also noted that consideration was given to having them at times convenient for the public to attend. The Council's own website would also be an appropriate location to advertise such webinars.

It is recognised that the Council engaged with the traditional media to promote and advertise the plan-making process, in addition to making some use of social media.



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Please note, the OPR's Communications Officer is available to offer advice to all the planning authorities on public engagement in the plan making process, including at draft plan stage.

2.0 Core Strategy and Housing provision

The Issues Paper clearly sets out the broad policy context that will play a determining role in the scale and pattern of future growth for Galway city, including the hierarchy of statutory plans comprising *National Planning Framework* (NPF), the *Northern and Western Regional Assembly* (NWRA) *Regional Spatial Economic Strategy* (RSES), the *Galway Metropolitan Area Strategic Plan* (MASP); and other critical policy documents including, inter alia, the UN Sustainable Development Goals to which Ireland is a signatory, as reference by the planning authority.

The Issues Paper highlights the challenge for the planning authority in devising its core strategy in view of the very ambitious growth targets for the city set by the NPF and the RSES, with the Galway MASP area (shared with Galway County) target to grow by 27,500 to 2026 and by a further 14,500 to 2031.

The formulation of a new core strategy will form the most significant element of the development plan making process, as it will set out the planning authority's preferred approach to both the spatial pattern and quantity of housing delivery over the lifetime of the plan. The core strategy will provide the necessary framework around which all other elements of the plan will be constructed to support its sustainable implementation. It is critical, therefore, that the core strategy is appropriately tailored cognisant of all the constraints, infrastructural, environmental and social policy that apply within the city's functional area.

It should be noted that the targets for housing provision in the plan should be calculated in accordance with the section 28 *Housing Supply Target Methodology for Development Planning Guidelines for Planning Authorities* (DHLGH, 2020), and should inform the core strategy and the quantity of land zoned for residential development. The *NPF Implementation Roadmap* and the RSES also continue to apply at a more strategic and longer term level. However the Housing Supply Targets provide a further level of refinement specific to your plan period and a sharper focus on delivery of homes over that period. In



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In addition, the detailed legislative provisions concerning the core strategy, under section 10(2A), (2B) and (2C) of the Act, continue to apply.

These guidelines, policy and legislative provisions, in addition to statutory guidelines with a bearing on the form, layout and density of development, will be determining factors in the total quantity of land zoned for residential and other uses. The planning authority will need to consider the appropriateness of continuing the stated 155ha of existing zoned land into the new development plan within the revised policy context.

The baseline information on population growth trends, housing type, housing tenure and housing delivery for the city, as detailed in the Issues Paper, forms part of the evidence base upon which the future core strategy can be developed in order to meet this challenge. The NPF highlights the importance of underpinning statutory plans with a transparent evidence base.

The planning authority's suggested approach to the new core strategy focuses on the Knocknacarra, Rahoon and Castlegar, in addition to Arduan LAP (a designated Major Urban Housing Delivery Site) to the east of the city. It also focuses on the regeneration areas of Ceannt State, Inner Harbour and Headford Road, referred to in the current core strategy. These locations are considered appropriate for development, having been identified as strategic growth areas under the RSES. It will be particularly important that any strategic growth areas located peripheral to the city centre are fully integrated with the city, through appropriate quality sustainable and active transport infrastructure and services.

The Office also notes the identification of additional potential regeneration sites at Sandy Road and along Dyke Road. The Office would support the inclusion of additional regeneration sites that accord with the sequential approach, compact growth and integration of land use transport. The Office agrees with the planning authority's assertion that sites served by good public and sustainable transport facilities and other supporting services, which provide opportunities for reductions in carbon footprint, should be considered as part of the plan-making process.

The Office is available to liaise with your planning authority and the Department in its formulation of the core strategy over the coming months.



3.0 Regeneration and Compact Growth

The Office welcomes the recognition, in the Issues Paper, of the role that urban regeneration and compact growth will play in the future development of the city, including through the strategic development and regeneration areas of the MASP. You will also be aware that the development plan is required, under section 10(2A)(h) of the Act, to include objectives for the development and renewal of area, consistent with your core strategy, that are in need of regeneration.

Your planning authority's stated intention to support the provision of 40% of all new homes, targeted within the city development envelope, on infill and/or brownfield sites, is consistent with of RPO 3.6.2. The proposal to give particular consideration to the capacity of the regeneration sites at Ceannt station, Inner Harbour and Headford road area and brownfield, infill and underutilised lands to accommodate new home demonstrates a commitment to the implementation of RPO 3.6.2. As noted, above, these sites have been identified as strategic growth areas in the MASP and the development of same are support by RPO 3.6.4.

The Office would strongly encourage your planning authority to prioritise the development of such key regeneration sites for significant development in your core strategy, ahead of greenfield development sites wherever feasible in order to achieve compact growth. This will better facilitate the achievement of compact growth and urban regeneration in line with the objectives of the NPF (NPO 3b), the RSES (RPO 3.2) and the MASP (RPO 3.6.2) for compact growth and infill/regeneration development.

The delivery of regeneration sites will require intensive and targeted action on behalf of the planning authority. This will need to be addressed through specific policies and implementation measures, in the development, to deliver infill / brownfield development in the city's designated strategic growth areas. These policies and implementation measures should be specific, targeted, and measurable (i.e. include monitoring measures).

The National Planning Framework (NPF) identifies managing the sustainable growth of compact cities, towns and villages as a National Strategic Outcome. In order to achieve this goal, NPO3b sets out a clear target to '*deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints*'. This is supported by RPO 3.6 of the MASP.



End-note 17 (appendix 4) to the NPF states that the '*existing built-up footprint*' is '*defined by the CSO in line with UN criteria i.e. having a minimum of 50 occupied dwellings, with a maximum distance between any dwelling and the building closest to it of 100 metres, and where there is evidence of an urban centre*'.

The Issues Paper identifies compact growth as a key sustainability element of the RSES and MASP, with an objective to locate at least half of all new homes that are targeted, within the city footprint of the MASP, the boundary of which aligns with the CSO definition of the town boundary (as per the myplan mapviewer). Your planning authority will be aware that, not only does the said boundary encompass extensive areas of agricultural land within your administrative boundary, it also extends into agricultural lands beyond the administrative boundary. It is evident that the 'town' boundary does not conform to the UN criteria and should not be relied upon for determining compliance with NPO 3b, RPO 3.2 and RPO 3.6.2.

In the interest of clarity, the Office advises that the '*existing built up footprint*' must be considered within the broader provisions of the NPF concerning compact growth, including infill and brownfield development and urban regeneration. This will be an important consideration in terms of demonstrating that targets for compact growth, whereby 50% of all new homes for Galway city and suburbs are provided within the existing built up footprint, will be fully supported in your future development plan.

Having regard to the objectives of the NPF (NPO 35) and the RSES (RPO 7.20), the development plan will also be required to include a range of measures to reduce the level of building vacancy within the city as part of its overall approach to compact growth and regeneration in order to pursue the densification of the city area. The aforementioned national and regional objectives also require the development plan to include measures for increased building heights.

The suite of section 28 guidelines concerning residential development, including, inter alia, those relating to *Urban Development and Building Heights* (2018), the *Sustainable Urban Housing: Design Standards for New Apartments* (2018) and the *Sustainable Residential Development in Urban Areas (Cities, Towns and Villages)* (2012) will inform the objectives, policies and standards of the future plan to ensure the implementation of compact growth. This includes the implementation, through the development plan, of the Specific Planning Policy Requirements (SPPRs) in addition to the more general requirements of the guidelines



In addition, as the city population expands and the overall level of residential development densifies and mix of uses intensify, it will be essential that the plan includes appropriate safeguards to maximise the quality of life for its population. This includes providing for, inter alia, healthy places, age friendly communities and the integration of education, community and recreational facilities, in addition to quality public transport and housing supply as directed by chapter 7 of the RSES.

4.0 Economic Development & Employment

The Issues Paper recognises the role of the city as a driver of economic development and competitiveness in the region, with the potential to drive growth at a national level. A vital aspect of the plan will be the promotion and nurturing of the city's economic and employment base in order to sustain the city and the wider region and support the planning authority's ambition for the economic role of Galway city.

In accordance with the NPF requirements (NPO10b), the RSES has identified strategic employment development areas within the MASP as identified in Figure 21, including industry and technology sites. The inclusion of objectives, policies and mechanisms to assist and secure the development of those strategic economic development locations (subject to any appropriate and necessary safeguards), can therefore be anticipated to form a key element of the development plan.

A wide range of regional economic drivers, focused on Galway city, are referred to in the Issues Paper, ranging from high tech industry, to tourism, retail and gastronomy and research, education and the marine, as supported by the MASP. A key element in supporting, developing and expanding this enterprise base will be the protection and enhancement of critical services and sustainable transport infrastructure for the city, in addition to soft infrastructure such as public realm and urban context improvements. In this regard the Office notes the proactive approach of the planning authority in its publishing of the *Galway Public Realm Strategy 2019*. Further direction on the planned approach to economic development and employment generation is available in Chapter 4 of the RSES.

Coordination with the LECP 2015-2021, which sets out objectives and actions to promote local and community development and economic development in Galway City, should also be explored as part of the plan making process.



The retail environment for cities and towns across the state is heavily challenged, with the covid-19 pandemic rapidly exacerbating existing adverse trends that have become evident in recent years. The Office welcomes the proposal to include a retail strategy as part of the plan. The planning authority will be aware that under the *Retail Planning Guidelines (2012)* a joint retail strategy for Galway city and Galway county is required to be prepared to inform the development plans for the two planning authorities.

5.0 Transport & Accessibility

The Issues Paper recognises that the provision of sustainable mobility is crucial to the efforts to reduce greenhouse gas emissions and air pollution and that the current development plan has a strategic aim to integrate sustainable land use with a transportation system that is based on smarter travel principles

The significant progress that has been made by your planning authority to integrate land use and transportation in recent years, through the adoption and implementation of the Galway Transport Strategy is appreciated. It is anticipated that the GTS will continue to underpin the approach of the planning authority under the new development plan and ensure the provision of sustainable settlement and transport strategies for your plan area, in line with section 10(2)(n) of the Act.

It will be essential for your authority to achieve a significant modal shift in your functional area, in conjunction with Galway County Council, away from the private car and towards active and sustainable modes, in order to meet the modal shift targets under Smarter Travel and the requirements under section 10(2)(n) of the Act. This will achieve corresponding improvements in air quality and in the noise environments to benefit those living, working and/or visiting the city.

The approach to sustainable settlement and transport strategies should be informed by the Avoid-Shift-Improve (A-S-I) framework¹, which is consistent with the objectives of the NPF. In order to achieve this change, the further integration of spatial and transport planning, will be critical to avoiding the need to travel. This can be achieved through compact development and mixed use development.

¹ As referenced in 'Ireland's Environment - An Integrated Assessment 2020' (EPA, November 2020)



Modal shift to active and sustainable modes can be encouraged by providing pedestrian and cycling infrastructure and permeability, and facilitating and improving public transport modes and by locating of trip intensive development on locations served by high capacity public transport. Modal shift will also be assisted through, transport demand management measures, such as the application of maximum car parking standards instead of minimum standards (NPO 13 is pertinent in this regard).

Improvements in transport modes would include the accommodation of electric vehicles through the development plan, including through, for example, the commitment to provide or require the provision of car charging facilities.

In view of the requirements under section 10(2)(n) of the Act, the Office suggests that the draft Plan include broad targets for modal shift to be achieved over the plan period, against up to date baseline data on modal split. Such targets should be aligned to the promotion of relevant measures to achieve a reduction in greenhouse gas (GHG) emissions and energy use as required under the aforementioned subsection of the Act.

The implementation of the provisions for walking and cycling may be seen as crucial to achieving modal shift. Commitment to the proactive implementation of good urban design principles, including, inter alia, through the *Design Manual for Urban Roads and Streets* (revised 2019) in the required locations, will facilitate priority for active and sustainable modes, consistent with the objectives for Healthy Places under the RSES (in particular RPO 7.11). It will also result in improvement of the street environment and public realm and the overall quality of life of urban areas (MASP, p.69).

In order to maximise the potential for modal shift to active and sustainable modes, the planning authority is encouraged to apply the DMURS road user priority hierarchy in its preparation of the sustainable transport strategy under the plan.

It will also be important to ensure, through the objectives, policies and standards contained in the development plan, that the carrying capacity, operational efficiency, safety and significant national investment being made in national roads and light rail network are protected in accordance with, inter alia, *Smarter Travel* (DTTaS, 2009) and the *Spatial Planning and National Road Guidelines* (DoECLG 2012). This should include the protection of existing infrastructure and routes for future projects.



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Consideration to undertaking appropriate Area Based Transport Assessment and/or Strategic Transport Assessment (STA) to support the preparation of the Draft City Development Plan. And the Office would strongly advise the planning authority to continue to liaise with the NTA and TII, to maximise the implementation of appropriate improvements to the transport network and urban environment for the city.

6.0 Climate Action and Renewable Energy

Climate action – The Issues Paper recognises climate change as an urgent priority due to particular climate change risks associated to the city’s geographical context, and it acknowledges the need to meet these challenges to be met by appropriate action. The Office also welcomes the inclusion of clear definitions for climate mitigation and climate adaptation in the Issues Paper. It is advised that similar definitions are included in the development plan and that particular care is taken in how the terms mitigation and adaption are applied across the Plan, so as to avoid confusing the two related approaches.

The Government’s Climate Action Plan 2019 sets out the medium term strategy for the State’s response to climate change and, in the longer term, indicates its support for the adoption of a net zero target for carbon emissions by 2050 at EU level. The overall reduction of carbon emissions and energy use will necessarily be a cross-cutting planning policy issue to be addressed in the development plan.

Your authority will be aware that the Office is required under section 31AM(2)(a) of the Act to address, in particular, the legislative and policy matters within the scope of section 10(2)(n) in its evaluations and assessments of your authority’s development plan. This subsection concerns the inclusion of objectives for the promotion of sustainable settlement and transport strategies for both urban and rural areas, which include the promotion of measures to reduce energy demand, to reduce GHG emissions and to adapt to climate change through, in particular, the location, layout and design of new development.

In this regard, the implementation of the *Galway City Climate Change Adaptation Strategy Plan 2019-2024 (Climate Resilient Galway City)* by your authority can be expected to contribute to your authority meeting the requirements under the Act. It is important that climate adaption and mitigation measures are fully mainstreamed into the development plan, through objectives, polices and through appropriate development management standards.



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Regarding climate change adaptation, the Office notes the recognition of flood risk as a critical issue within your authority's functional area. The Issues Paper clearly indicates your authority's intention to address the relevant environmental assessments and obligations during the plan making process, including the critical issue of Strategic Flood Risk Assessment (SFRA).

The Office would advise your authority to consult with the Office of Public Works (OPW) at the earliest opportunity to ensure your approach to SFRA is consistent with the approach required under *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (DEHLG & OPW, November 2009) as clarified by Circular PL 2/2014. In this regard the planning authority should be aware that the circular clarified important issues concerning the undertaking of the justification test for, inter alia, the existing, zoned built up area, even where only minor development would be anticipated. It will also be important that the SFRA also takes due account of the potential impact of climate change on flooding in order to ensure potential flood risk to the city (and its people and property) is fully and appropriately addressed through the plan making process.

Regarding climate change mitigation measures pertinent to section 10(2)(n) of the Act, the matters discussed in the preceding section on Transport & Accessibility will be critical. This will include the integration of land use and transport, the facilitation of active and sustainable modes and the implementation of transport demand management measures consistent with the requirement for sustainable settlement and transport strategies.

The Office understands that forthcoming updates by the Department to the section 28 *Development Plan Guidelines* will initiate a process of enhanced guidance for the preparation of development plans. This is likely to include guidance on the requirements under section 10(2)(n) of the Act.

Renewable Energy - Your authority will note that both the NPF (NPO55) and the RSES (inter alia, RPO 4.17) promote and support renewable energy generation, which will contribute to achieving a net zero carbon economy by 2050.

While the scope for wind energy deployment in the area of the City Council may be comparatively limited, your authority's attention is nonetheless drawn to relevant parts of the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change and Wind Energy Development Guidelines 2006 – Update on Review (July*



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2017), subject of Circular Letter PL 5/2017. The Guidelines require that development plans indicate how their implementation will contribute to realising overall national targets on renewable energy and climate change mitigation and are worth considering in the context of the next development plan for the City.

In this regard, the Office welcomes the recognition of the planning authority for the need to focus on development of renewable sources of energy and reducing energy demand in order to transform Ireland's economy, and the consideration of the role of micro-renewables and to the potential for combined heat and power (CHP) and for district heating systems to use waste heat. It will be critical for the development plan to provide clarity on how it is proposed to ensure that infrastructure, such as district heating using waste heat, will be implemented by public and private development.

7.0 Culture and heritage

The built and cultural heritage of Galway city, including the vibrancy of the Irish language, plays a key role in the image and economic performance of the city. The Council has a strong record in the area of built and cultural heritage protection in carrying out its forward planning, through the RPS and designation of ACAs and through its development management functions.

Similarly, the unique geographic context of the city results in the close relationship between the city and nature, and the planning authority has strived to protect its important natural heritage to support the city's *Biodiversity Action Plan 2014-2024*.

However the need to accommodate growth and intensification of the city will likely increase the pressures on built, cultural and environment heritage, in particular, and stretch the existing management systems in place to protect same. The Issues Paper recognises, for example, the challenge that will be posed to waterbodies through increased recreational use. The development plan will also need to be clear in terms of the obligations, limitations and opportunities that arise with respect to sites subject of specific environmental designations.

The protection of culture, built and environmental heritage amenities, both in their own right, as amenities for the public and as important economic drivers for the city is an important function of the development plan. The need to strike a balance between conservation and



development, as recognised in the Issues Paper, will present a significant challenge to be addressed by the development plan.

The environmental assessments required to inform the plan making process, including SEA, AA and SFRA will assist in ensuring the adverse impacts on all factors of the environment are appropriately protected through the implementation of the future development plan. The requirements of the Water Framework Directive and the River Basin Management Plan will also be critical considerations in the formulating of the plan, not least in the consideration of appropriate objectives to be included in the plan as required under section 10(2)(cb).

8.0 Implementation

The Issue Paper highlighted the significant challenge of accommodating growth for the city, with particular reference to housing delivery. A primary issue for the next plan will be the focus on practical implementation of the core strategy during the plan period. In this regard, the delivery of enabling infrastructure and key future growth enablers identified in the NPF, the RSES and MASP will be crucial.

In particular, the MASP identifies capacity issues in relation to transport investment priorities, in addition to both water supply and wastewater infrastructure, as the key areas of concern. Resolving of capacity constraints in these areas will be critical to facilitating the growth of the city. The Office notes the planning authority's intention to prepare the plan in consultation with Irish Water. Maximising the implementation of SuDS, as referred to in the Issues Paper as part of the green networks for the city, has the potential to alleviate current and/ or prevent future pressure and capacity issues on the surface water network and the wastewater network where any combined system remains.

In addition, ensuring that the social, educational and environmental infrastructure of the city has the capacity to accommodate the sustainable growth of the city will be a critical consideration of the plan.

Regarding infrastructure provision, the Office would highlight the requirement for a tiered approach to zoning in accordance with NPO72a-72c. The scope of any infrastructure assessment study will need to be sufficiently broad to take account of the full range of enabling infrastructures and will need to provide clarity in terms of the timeframe for delivery,



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cost of delivery, identification and availability of funding and the body responsible for implementation in order to provide the certainty required to ensure delivery of the core strategy over the plan period.

This information will therefore enable your planning authority to prioritise relevant land banks with appropriate land activation measures within its control in the near, medium and longer term in order to achieve the growth objectives for the city over the 6-year plan period, and to 2031 and 2040.

The collaborative approach between local authorities and between local authorities and key sectoral interests is emphasised throughout the RSES. Consultation and close collaboration with Galway County Council, in addition to relevant infrastructural providers, will likely be critical to the implementation of the core strategy and the coordination of strategic growth areas adjacent the city boundary. This will ensure the MASP area is developed in a coordinated, integrated and sustainable as part of an overall strategy for the proper planning and sustainable development of the two neighbouring authorities in accordance with section 10(1) of the Act. This is likely to be particularly relevant at Arduan. In this regard, the Office would highlight the importance of subsections 9(4) and (5) of the Act.

In order to maximise the coordinated approach for the entire MASP area the planning authority is strongly advised to liaise with Galway County planning authority to develop a shared MASP vision that would be included in the separate development plans for each planning authority. This could identify shared infrastructural, environmental and other capacity constraints, explore shared solutions to such constraints, prioritise and set timeframes in relation to implementation initiatives, and provide high level objectives and policies that would apply across the full extent of the MASP.

Your planning authority should take realistic account of the level of certainty that the required infrastructure and facilitating works will be completed in time to facilitate the development of the strategic growth areas to accommodate the population growth and housing supply envisaged under the RSES, MASP and the *Section 28 Housing Supply Target Methodology for Development Planning Guideline for Planning Authorities (2020)* within the plan period.

In order to overcome the ongoing challenge of housing delivery within the city, the Office strongly advise the development plan to prioritise the development of specific strategic growth areas and sites, having regard to the availability or impending delivery of necessary



infrastructure to support the sustainable development of those lands. The prioritisation of specific sites or land for development should be accompanied by clear timelines for delivery of same based on an appropriate evidence base, and any uncertainties should be identified during the plan making process..

Accordingly, use of scenario planning may be appropriate in devising your development plan, whereby your development plan would identify a sequence of development opportunities with in-built resilience to move to another tier of development opportunities if any key opportunity areas were subject to unforeseen delays in the delivery of enabling infrastructure. At the same time, such alternative sites will need to be consistent with objectives of the NPF, the RSES and MASP.

Summary

In conclusion, the Office commends your authority on the range of key issues considered in its Issues Papers and its proactive approach to engagement with the public, including through extensive webinars, the traditional media and social media.

The next Galway City development plan presents both new opportunities and challenges for the city and the wider Galway Metropolitan Area in line with Government policy under the National Planning Framework and the Regional Spatial and Economic Strategy, as the major engine for economic growth in the Northern and Western Regional Assembly Area.

In summary, the Office would advise that your authority to pay particular attention to the following issues in the formulating of the development plan.

- To better ensure a coordinated approach to the development to the Galway MASP, the planning authority is strongly encouraged to liaise with Galway County planning authority to collaborate on the development of a shared vision for the entire MASP area for inclusion in the development plans of each planning authority. A coordinated approach with Galway County with the necessary on a range of matters, including the development of some strategic growth areas to ensure sustainable development.
- To achieve urban regeneration, intensive and targeted action to activate underutilised or vacant land (and buildings) will be required supported by specific policies and



implementation measures to deliver infill / brownfield development in the designated strategic growth areas.

The prioritisation in the plan of specific strategic growth areas for sustainable development, cognisant of existing infrastructure (and other) capacity and/or a definite timeline for resolution of existing constraints, with clear timelines will help overcome the existing challenges facing the city in terms of housing delivery.

- To achieve compact growth, the definition of the '*existing built up footprint*' under the development plan must be considered within the broader provisions of the NPF concerning compact growth, including infill and brownfield development and urban regeneration, and should note be set by the CSO town boundary.
- A joint retail strategy for Galway City and County is required, under the *Guidelines for Planning Authorities Retail Planning (2012)*, to be prepared to inform the content of your development plan, and would be timely in view of the severe challenges currently facing the retail sector.
- The provision of clear policy support for the implementation of the Galway Transport Strategy, in addition to appropriately tailored and focused planning objectives, policies and development management standards, in a coordinated approach with Galway County, and in consultation with NTA and TII, will support the implementation of an integrated land use transport approach for the MASP area.
- Appropriate provision should be made to support the delivery and integration of key transport and other infrastructure enablers to accommodate city growth over the plan period and beyond, in consultation with infrastructure providers and Galway County, as appropriate.
- All climate mitigation and adaptation measures should be fully integrated into the development plan and the plan should provide clarity in terms of objectives and measures proposed under section 10(2)(n), including as necessary to inform any future LAPs.



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- Consultation with the OPW should be carried out in relation to the preparation of the Strategic Flood Risk Assessment to ensure compliance with the requirements of the 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (2009) and associated clarifying Circular PL2/2014.
- The plan should promote the continual improvement in the quality of the urban environment, including the public realm and street environment, the range of housing to accommodate diverse needs, recreation and community, culture and heritage and the natural environment.

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

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.

Is mise le meas,

Anne Marie O'Connor
Deputy Regulator and Director of Plans Evaluations
