



Oifig an  
Rialaitheora Pleanála  
Office of the  
Planning Regulator

**DP-009-22**

13<sup>th</sup> April 2022

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

**Re: Draft Galway City Development Plan 2023-2029**

A chara,

Thank you for your authority's work in preparing the draft Galway City Development Plan 2023-2029 (the draft Plan).

The Office of the Planning Regulator (the Office) wishes to acknowledge the considerable work your authority has undertaken in the preparation of the draft Plan against the backdrop of an evolving national and regional planning policy and regulatory context.

Notwithstanding that the *Development Plans, Guidelines for Planning Authorities Draft for Consultation* (2021) are in draft form, they provide clarity and assistance to planning authorities in the completion of development plans.

As your authority is aware, a key function of the Office is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning.

The Office has evaluated and assessed the draft Plan under the provisions of sections 31AM(1) and (2) of the *Planning and Development Act 2000*, as amended (the Act) and this submission has been prepared accordingly.

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy



of Government, as set out in the Ministerial guidelines under section 28. As such, the planning authority is required to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. The planning authority is requested by the Office to action an observation.

A submission also can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. The planning authority is requested by the Office to give full consideration to the advice contained in a submission.

## **Overview**

The draft Plan is being prepared at a crucial time following the preparation of the *National Planning Framework (NPF)* and the *North Western Regional Assembly Regional Spatial and Economic Strategy (RSES)*, which seek to promote the rebalancing of regional development in a sustainable manner by enhancing and improving the critical mass of the Galway metropolitan area.

The draft Plan has proactively embraced many of the challenges and opportunities identified in the NPF and the RSES, in particular by setting out a strategy for the growth of the Galway Metropolitan Area Strategic Plan (MASP) to enable Galway to achieve the critical mass in terms of housing, employment, services and amenities needed to develop as a city region.

In particular, the Office welcomes and commends your authority for the preparation of Chapter 10 (Compact Growth and Regeneration) as an approach to facilitate and promote the redevelopment of infill and brownfield sites, with potential for positive impacts on compact growth, sustainable transport and climate mitigation.

The identification of Regeneration and Opportunity Sites (in Chapter 10), demonstrates the plan-led approach to the sustainable development within Galway



city and suburbs, and the planning authority's commitment to consolidating existing areas. Furthermore the sustainable neighbourhoods in Chapter 3 provide a framework for the sustainable development of the established and newer suburbs.

The Office also wishes to acknowledge the significant work undertaken in the preparation of '*The Galway Urban Density and Building Height Study, 2021*', as supporting documentation for the draft Plan, that provides a development framework for the draft Plan. The Office also commends the planning authority for the preparation of a comprehensive transport strategy that will be beneficial in contributing to the climate action agenda.

Finally, the Office welcomes the inclusion of a strategy for implementation and monitoring in Appendix 1 of the Plan. This is particularly important given the emphasis on monitoring and implementation in the newly published *Development Plans, Guidelines for Planning Authorities – Draft for Consultation (2021)*. The preparation of the Settlement Capacity Audit (section 1.5) and the core strategy statement (section 1.5.3) is also to be commended and is consistent with the aforementioned draft Guidelines (2021).

The Office has however, identified a number of areas that require significant further consideration in order to ensure consistency with the legislative provisions and national and regional policy.

In particular, the population and housing targets in the draft Plan are not consistent with the *Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities (2020)* and must be reviewed.

It is vitally important that development plans ensure a sufficient and stable supply of residential zoned land aligned with the housing supply targets in your core strategy, and in the right locations. The Office is of the view, however, that the amount of land zoned for such residential development also requires review, with a particular focus on prioritising serviced lands closest to the services and amenities and on existing or proposed public transport corridors.

The Office has also identified a clear conflict with the ‘LDR Low Density Residential’ zoning objective having regard to the changes in national and regional policy since the adoption of the existing Development Plan.

By adopting a ‘Neighbourhood Areas’ development strategy and focusing on the regeneration and opportunity sites, the Plan provides a clear opportunity to consolidate the built up area of the City and provide a sustainable settlement and transportation strategy consistent with the ‘15 minute City’ concept and providing a high quality of life for existing and future residents.

This vision is not, however, consistent with the low density development that would be facilitated by both the LDR zoning objectives and the housing polices for the rural hinterland.

The Office also considers that there is greater opportunity for co-ordination between the City Council and neighbouring Galway County Council, particularly in relation to the connected metropolitan settlements of Ardaun (City), Gaurran, and Briarhill.

The planning authority will also be aware that the Office’s evaluation of the plan is required under section 31AM(2)(a) of the Act to address, in particular, matters within the scope of section 10(2)(n) of the Act in relation to climate change. The issues raised in relation to achieving a less car dependant pattern of development (Recommendations 1-5, and 8), further consideration specific polices objectives to support renewable and low carbon energy (Recommendation 11) and flood risk management (Recommendation 12) will be important in terms of providing a sustainable settlement and transportation strategy in accordance with section 10(2)(n).

It is within this context the submission below sets out 13 recommendations and 8 observations under the following 11 themes:

Key theme	Recommendation	Observation
<a href="#">Core strategy and settlement strategy</a>	Recommendation <a href="#">1</a> and <a href="#">2</a>	-



<a href="#">Sustainable Development</a>	Recommendation <a href="#">3</a> , <a href="#">4</a> , <a href="#">5</a> and <a href="#">6</a>	Observation <a href="#">1</a>
<a href="#">Approach to Development</a>	Recommendation <a href="#">7</a>	Observation <a href="#">2</a>
<a href="#">Rural Housing</a>	Recommendation <a href="#">8</a>	-
<a href="#">Housing Policies</a>	Recommendation <a href="#">9</a>	-
<a href="#">Economic Development and Employment</a>	Recommendation <a href="#">10</a>	Observation <a href="#">3</a>
<a href="#">Sustainable Transport and Accessibility</a>	-	Observation <a href="#">4</a>
<a href="#">Climate Action and Renewable Energy</a>	Recommendation <a href="#">11</a>	Observation <a href="#">5</a>
<a href="#">Flood Risk Management</a>	Recommendation <a href="#">12</a>	-
<a href="#">Environment, Heritage and Amenities</a>	Recommendation <a href="#">13</a>	Observation <a href="#">6</a>
<a href="#">Implementation and Monitoring</a>	-	Observation <a href="#">7</a> and <a href="#">8</a>

## 1. Core Strategy and Settlement Strategy

### 1.1 Housing and population targets

The Office is satisfied that the total City population projections to 2029 in section 1.4.22 of the draft Plan are generally consistent with the population prescribed for the City in the RSES and NPF.

The Office notes that the planning authority has prepared a Housing Supply Target for the 2023-2029 plan period as required by the section 28 *Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities* (2020).



The Office estimates, however, that the housing supply targets for your authority calculated in accordance with Guidelines as c. 6,400 for the plan period<sup>1</sup>, is higher than the housing need (4,433) identified in Table 1.4 Total Annual Housing Need.

The Office further notes that the Housing Supply Target calculated in accordance with the Guidelines has not been used for the Core Strategy (Table 1.8), which instead applies an alternative methodology. This is not consistent with the *Development Plans, Guidelines for Planning Authorities - C Draft for Consultation (2021)* (the draft Guidelines (2021)), which specifies that the methodology in the HST Guidelines must be used in meeting the statutory obligations in the core strategy. As a consequence, significant revisions will be required to the core strategy, as set out in Recommendation 1 below.

## **1.2 Settlement Hierarchy and distribution of growth**

The core strategy table (table 1.9) provides a very high-level view of potential development yield of zoned land across only 4 categories: Class 1 consolidation of existing neighbourhoods; Class 2 regeneration and opportunity sites; Class 3 Ardaun Phase 1; and Class 4 Ardaun Phase 2.

This results in a very broad settlement strategy which does not co-ordinate the neighbourhoods identified in the core strategy map (Figure 1.6) with the core strategy table, or provide any indication of the expected distribution of growth across these areas.

In addition, while the Office very much welcomes the identification of regeneration and consolidation sites, the draft Plan does not provide a clear vision as to the prioritisation or timing for the delivery of these sites.

As a consequence, there is a lack of clarity regarding the draft Plan's strategic preferences for development (and associated infrastructure), and the portion of the HST figure that could realistically be delivered in each neighbourhood area/regeneration area over the plan period.

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<sup>1</sup> If the potential adjustment for local authority areas where NPF projected annual average targets significantly exceed recent levels of housing output.



The absence of a more detailed core strategy table also makes monitoring the implementation of the Plan more difficult in terms of progress on meeting housing targets for the plan period.

While it is acknowledged that the *draft Guidelines (2021)* anticipate a different approach for city development plans in terms of a core strategy table compared to most planning authorities in the country, it is considered that what is contained in Chapter 1 is inadequate for the reasons set out above.

Having regard to these issues, the Office considers that the information provided in the core strategy of the draft Plan regarding the settlement hierarchy is too broad and does not adequately address the requirements of section 10(2A) (f), (g) & (h) and 10(2C) of the Act and section 4 (core strategy) of the *draft Guidelines (2021)*.

#### Recommendation 1 - Core Strategy Table and Settlement Hierarchy

In accordance with the requirements of sections 10(2A) (f), (g) & (h) and 10(2C) of the *Planning and Development Act 2000*, as amended, and having regard to the *Housing Supply Target Methodology for Development Planning (2020)*, *Guidance Note on Core Strategies (2010)* and the *Development Plans, Guidelines for Planning Authorities - Draft for Consultation (2021)*, the planning authority is required to review the core strategy in Chapter 1 of the draft Plan and revise as necessary to:

- (i) provide a single core strategy table for the city as a whole which includes housing supply targets specific to the plan period calculated in accordance with the section 28 guidelines *Housing Supply Target Methodology for Development Planning (2020)* and Appendix 1 of the accompanying *Ministerial Letter to Local Authorities of 18/12/20*;
- (ii) provide a broad settlement hierarchy which clarifies the draft Plan's strategic preferences for development, with a distinction between the city centre area; specific neighbourhoods where housing is planned to be located consistent with the Core Strategy Map; regeneration and

- opportunity sites which are likely to be developed over the plan period:  
Ardaun Phase 1, Ardaun Phase 2, and other lands as relevant; and
- (iii) revise the population and housing supply targets for the plan period for each area in (ii) above, including an aggregate population and housing supply target for areas outside of Class 1 to 4 (Table 1.9), *i.e.* areas designated with the land use zoning objective 'Low Density Residential and/or Agriculture'.

### 1.3 Zoning for Residential Use

The draft Guidelines (2021) provide clear guidance in terms of ensuring that sufficient housing lands/sites are provided in development plans based on the housing unit yield of land zoned for residential and a mix of residential and other uses.

This is critical in terms of the ability to plan for the timely delivery of physical and social infrastructure in the right location to serve new housing development, and to ensure that development occurs in a sustainable manner.

The core strategy for Galway City has identified that sufficient land has been zoned for 11,111 homes over the plan period (Table 1.4), significantly above the HST calculated by the Office (c.6,400). Even after factoring in the possibility of 20 – 25% 'Additional Provision' provided for under the draft Guidelines (2021) (section 4.4.3) under certain circumstances, there would appear to be a significant surplus of zoned land which should be reviewed to provide for greater focus and prioritisation over the plan period.

As stated previously, the Office strongly supports the ambition for Galway City as a regional driver of growth and to counterbalance the growth of the Dublin area, consistent with the NPF and RSES.

However, this level of zoning, together with the lack of a clear identification of where development would be best located in the core strategy, makes it difficult to direct investment in social and physical infrastructure in a manner that will provide for the





needs of existing and future residents, and ultimately undermines the delivery of sufficient new homes.

In addition to the above, both the existing *Development Plans, Guidelines for Planning Authorities* (2007) and the draft Guidelines (2021) require that a sequential approach is followed when zoning lands whereby the most centrally located areas close to existing services and amenities and well served by public transport are prioritised for new development.

In relation to sequential development in a city context, the draft Guidelines (2021) stress that the focus of the development plan must be on securing sufficient infill and brownfield development and regeneration, and prioritising new development along high quality public transport corridors.

In this regard, and having regard to the excess of zoned land in the draft Plan, the planning authority should review the zoning of lands that are further located from the city centre and situated on the edge of the city boundary, including any sites that are unlikely to come forward for development during the course of the plan cycle, and which in some cases would undermine the achievement of compact sustainable development.

Where required, consideration should be given to prioritising or phasing the development of certain lands, and/or alternative objectives by indicating lands that will be considered for alternative appropriate uses within the plan period.

In so doing, the planning authority should have regard to:

- (i) the location of Class 1 (within Table 1.9) undeveloped residential land in the newer suburbs consistent with the provisions for a sequential approach to zoning for residential development under section 4.19 of the *Development Plans, Guidelines for Planning Authorities* (2007) and section 6.2.3 of the draft Guidelines (2021), with particular regard to public transport corridors and transport nodes; and
- (ii) the extent of masterplans and local area plans for specific Regeneration and Opportunity Sites (Chapter 10) and identifying sites, or parts of larger sites,



that will be phased and built out over a longer period than the six-year development plan, aligned with the delivery of enabling infrastructure and consistent with the approach set out in section 4.4.3 of the draft Guidelines (2021).

## Recommendation 2 – Zoning for Residential Use

In accordance with section 10(2A) of the *Planning and Development Act 2000*, as amended, and having regard to the approach ensuring sufficient supply of housing lands and the principles of sequential development set out in the *Development Plans, Guidelines for Planning Authorities (2007)* and the *Development Plans Guidelines for Planning Authorities - Draft for Consultation (2021)*, the approach to zoning required under National Policy Objective 72 (a-c), and the NSO for compact growth and NPO3 of the NPF, the planning authority is required to:

- (i) review the extent of land zoned for residential or a mixture of residential and other uses in the core strategy (table 1.9) to ensure consistency with the revised housing supply targets, as calculated under the section 28 *Housing Supply Targets Methodology for Development Planning Guidelines for Planning Authorities* (December 2020), and Recommendation 1 above;
- (ii) confirm or provide that the densities used in the calculation of housing yield are based on density assumptions consistent with the *Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) Guidelines for Planning Authorities* (2009), and the *Galway Urban Density and Building Height Study* (2021);
- (iii) where the potential housing unit yield of zoned land exceeds that required to meet the projected housing supply target, the planning authority is required to amend the core strategy and zoning map to prioritise appropriately located land with delivery potential within the plan period, and to phase or re-zone residential development less peripherally located

- in the new suburbs having regard to the principles of sequential approach to zoning and compact growth; and
- (iv) amend the core strategy table to include the area zoned to accommodate residential development in hectares and estimated housing yield for each area as specified under Recommendation 1, specifically identifying the 'Additional Provision' where relevant.

## 2. Sustainable Development

### 2.1 Infrastructure Capacity Assessment

The Office welcomes the inclusion of the Settlement Capacity Audit (Section 1.5) and infrastructure tier in Table 1.9, in addition to the details regarding Regeneration and Opportunity Sites in Chapter 10 of the proposed draft Plan.

The inclusion of information regarding infrastructure capacity and constraints provides greater clarity for the development sector and enables the local authority and other agencies to focus delivery of essential infrastructure, services and facilities on more precise locations where housing can be more rapidly developed, supported by transport and amenities.

While the information provided in the draft Plan provides a high level overview of infrastructure capacity, it is not considered to be sufficiently comprehensive or detailed to distinguish between lands that are fully serviced and lands that have outstanding requirements for specific service/infrastructure provision, but which can feasibly be provided during the plan period.

It appears that much of this information required in an infrastructural assessment as set out in the methodology for a Tiered Approach to Zoning (TAZ) in the NPF is available and has informed the plan. However, this needs to be provided in a format consistent with Appendix 3 of the NPF. By way of example the planning authority is advised to examine how other development plans presented their infrastructural assessment, in this regard the Louth, Dún Laoghaire-Rathdown, and Limerick (Material Amendments) Development Plans are good examples.



The planning authority should also highlight key requirements for constraints identified in respect of Opportunity Sites. For example, Section 10.17 Doughiska Road Opportunity Site has restriction of access to the N6 “dual carriageway “ and associated junction, with mitigations required and significant water and wastewater network reinforcements will also be required. The phasing and prioritisation of residential zoned land taking account of water services infrastructure in accordance with Recommendation 2 above should also be informed by this exercise.

### Recommendation 3 – Tiered Approach to Zoning

Having regard to NPO 72a, NPO 72b and NPO 72c, and the *Development Plans, Guidelines for Planning Authorities - Draft for Consultation (2021)*, the planning authority is required to elaborate and expand upon its infrastructural assessment, as necessary, to fully address the status of all residential lands zoned under the plan in accordance with the methodology for a tiered approach to land zoning under Appendix 3 of the NPF, relating to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage, water supply and/or additional service capacity. It must also include, if required, a reasonable estimate of the full cost of delivery of the required infrastructure to the identified zoned lands at draft and final plan stages of the plan making process.

## 2.2 Compact Growth and Regeneration

It is an objective (NPO 3b) of the NPF that 50% of all new homes in the five cities and suburbs, including Galway, are to be delivered within the existing built up footprint. This is supported by several other objectives in the NPF including NPO 6 and NPO 7 (regeneration) and NPO 13 (development standards).

The North Western Regional Assembly in their RSES also seeks to strengthen the settlement structure of the region and implement objectives of compact growth, sustainable travel and place making.

RPO 3.2 specifically supports the implementation of NPO 3, requiring that development plans and core strategies are supported by specific objectives for urban infill/brownfield development, and provide an evidence base for the availability and deliverability of lands to deliver 50% of new homes within the existing built up footprint of settlements.

Furthermore in view of the critical role compact growth is intended to play in Ireland's mitigation of climate change, as part of the transition to a low carbon economy, in addition to the requirements under section 10(2)(n) of the Act, it is essential that this element of the NPF be implemented fully, having regard to the broader considerations of the NPF regarding infill development.

The Office welcomes the dedicated chapter, Chapter 10 'Compact Growth and Regeneration' in the draft Plan as a framework for compact growth and regeneration for Galway city and suburbs. Chapter 5 also sets out objectives relating to compact growth and further references are made to the concept elsewhere in the draft Plan (including Chapter 8 - placemaking).

The Office considers, however, that greater clarity and direction as to how these objectives are to be achieved is required in order to ensure the plan is consistent with both the NPF (NPO 3) and RSES (RPO 3.2).

#### Recommendation 4 - Compact growth and regeneration

In order to ensure that the delivery of 50% of all new homes within Galway City and suburbs takes the form of 'infill' or brownfield development within their existing built-up footprints, and for consistency with NPO 3 and RPO 3.2, the planning authority is required to identify and quantify the zoned land within the city council boundary that will contribute to this target and include details of same in the revised core strategy table.

In this context, the planning authority should have regard to the definition of brownfield and the range of infill development provided for under the *Guidelines for*

*Planning Authorities on Sustainable Residential Development in Urban Areas* (2009).

[*Development Plans Guidelines for Planning Authorities - Draft for Consultation* (2021) (appendix A) provides a useful reference and illustrative example for the presentation of this information in the core strategy table.]

### **2.3 Low Density Residential**

The Office notes that the draft plan includes areas zoned LDR 'To provide for low-density residential development which will ensure the protection of existing residential amenity and environmental sensitivities'.

Section 11.2.8 of the draft Plan sets out the zoning densities for the individual LDR zonings, which range from a maximum density of 2.5 to 5 dwelling per hectare, or in other cases are restricted to a specific number of houses to be reserved for the use of immediate family members of the landowner.

While it is acknowledged that many of these objectives are included in the existing Development Plan, this predated the publication of the NPF, RSES and many of the section 28 ministerial guidelines.

The planning authority will also be aware that under section 10(2B)(8) of the Act, there is no presumption that any land zoned in a particular development plan will remain so in any subsequent plan.

The current review process does, therefore, provide an opportunity to reconsider a more sustainable approach to zoning for these lands, consistent with compact growth, a sustainable settlement and transportation strategy, and protection of the environment.

In relation to compact growth, the Office considers that the approach in the draft Plan to continue to facilitate extensive low density housing into the rural hinterland around the city's fringe would undermine the potential of the city to deliver its 50% compact growth target in NPO 3b. In relation to larger strategic sites, such as the LDR on the



Tuam Road (c.19 ha) LDR at Briarhill (11 ha) there is no clear rationale for applying a significantly lower density to these lands, and development at such low density would result in further sprawl on the edge of the City. Site specific constraints such as topography etc can be addressed through other policies to ensure that appropriate forms of development are ensured through the planning application process.

The Office also notes the recognition of the important role of the rural hinterland area at Section 5.2 of the draft Plan which states that ‘...*Agricultural lands also contribute to the green network providing a natural backdrop to the city and supporting a diverse habitat*’ with their primary purpose in respect of open space type being ‘*Lands used for agriculture purposes, often forming greenbelt, offering amenity, passive recreation and visual aspect, contributing to biodiversity.*’

This is consistent with NPO 62 of the NPF to strengthen the value of greenbelts and green spaces. The inclusion of LDR zoning objectives in lands otherwise zoned agriculture (‘A’ or ‘G’) is, therefore, inconsistent with this objective.

In relation to the Environmental Report and NIR, the Office also advises that the planning authority review the assessment of LDR zonings against the preferred development strategy (Sustainable Neighbourhoods) in the Environmental report, and the decision to screen out the need for appropriate assessment of the LDR in the NIR.

Having reviewed the areas zoned LDR in the draft Plan, the Office has identified a significant number cases where the zoning objective would be contrary to national and/ or regional policy.

#### Recommendation 5 – Low density residential zoning objectives

Having regard to the NPO 3b and NPO 62 of the NPF, policy 1.4 of the draft Plan to ‘*Support the compact growth of Galway City through appropriate policies that promote co-ordination between land use and locations that can be served by public transport and the walking and cycling networks and enables the delivery of 50% of all new homes within the existing built footprint on lands as set out in the Core Strategy*’, and **the Sustainable Residential Development in Urban Areas (Cities,**

*Towns and Villages) Guidelines for Planning Authorities (2009)*, the planning authority is required to review the approach to ‘LDR Low Density Residential zoning’ and to omit:

- (i) LDR zoning objectives where land is located within, or contiguous to the existing built up footprint of the City and which is served by existing and/ or proposed public transport corridors, where development at such low densities would be contrary to compact growth, and the densities set out in the *Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) Guidelines for Planning Authorities (2009)*, For example, Figure 11.18 Tuam Road, 11.16 Briarhill.
- (ii) Isolated LDR zoning objectives in areas otherwise zoned ‘A Agriculture’ or ‘G Agriculture and High Amenity’ which contain their own objectives and criteria in respect of rural housing. For example, Figure, 11.20 Ballindooley, 11.19 Carraig Ban, 11.26 and 11.31 in the Coolagh area, 11.29 Quarry Road Menlo and two further sites on Monument Road Menlo, Figures 11.27 and 11.28 in the Castlegar area, and 11.24 and 11.30 in the Roscam area which is also adjacent to the Galway Bay SAC and SPA complex.
- (iii) LDR zoning objectives in areas which are unserved with an existing high concentration of on-site wastewater treatment adjacent to areas of very high environmental sensitivity such as the Galway Bay SAC and SPA. For example, Figures 11.10, 11.11, 11.12, 11.13, and 11.14 in the extended Roscam area and Figure 11.25 Murrough.
- (iv) Associated policy objectives relating to Low Density Residential Areas, including Policy 3.8.1 and 3.8.2.

## **2.4 Development Management Standards and Guidelines**

The development management standards set out in Chapter 11 - General Development Standards and Guidelines are crucial for development and



regeneration projects, which support the overall objectives in the draft Plan, including the objective to achieve greater compact growth.

The draft Plan makes reference to a number of relevant development management standards applicable to development projects and which support the overall objectives in the draft Plan, including the objective to achieve greater compact growth. The NPF signals a move away from rigidly applied, blanket planning standards in relation to building height, garden size and car parking in favour of performance based standards (NPO 13) where appropriate.

The Office considers that there are a number of prescriptive standards promoted within section 11 of the draft Plan which could militate against the principle of promoting appropriate density and compact growth in the higher order tier settlements, for example in section 11.3.1, 11.4.2, 11.7.1 and 11.9.2, which reference plot ratio requirements and separation distances between residential dwellings. The Office also notes that the car parking standards are not linked to the availability of public transport and the restriction on grouped parking is inappropriate given this is a measure that can encourage less reliance on the private car.

#### **Observation 1 - Development Management Standards**

In accordance with the provisions of NPO 13, the planning authority is advised to focus on assessing individual development proposals on performance based criteria dependent on location and individual site characteristics and is requested to remove:

- (i) the plot ratio standards and minimum separation distances between opposing windows;
- (ii) the differentiation between Outer and Established Suburbs in relation to car parking provision, and link the car parking standards required to the availability of public transport and active travel infrastructure provided in accordance with the Galway Transport Strategy; and



- (iii) the reference to state that grouped parking shall not be allocated to individual residential units.

As referenced above, the Office welcomes the preparation of the *Galway Urban Density and Building Height Study (2021)*, which provides a framework for taller buildings and identifies a range of building heights in the urban area.

Specific Planning Policy Requirement (SPPR) 1 of the *Urban Development and Building Heights Guidelines for Planning Authorities (2018)* requires that statutory plans identify areas where increased building height will be actively pursued. Indeed, this is particularly relevant in the context of Galway City.

In this context, the Office considers that the planning authority should review the maximum height range in the city centre district having regard to the need to deliver on key NPF objectives for compact growth, and the potential for key landmark buildings in appropriate locations such as the larger regeneration sites.

In order to provide clarity and transparency at planning application stage, the Office also considers that the density guidance and standards contained in the supporting publication *Galway Urban Density and Building Height Study (2021)*, should be included in the draft Plan as statutory objectives, and should be consistent with the section 28 *Guidelines on Sustainable Residential Development in Urban Areas (2009)* and *Circular NRUP 02/2021 Residential Densities in Towns and Villages* which support national and regional policy objectives for compact growth.

#### Recommendation 6 - Development Management Standards

In accordance with section 10(2A)(a) of the *Planning and Development Act 2000*, as amended, and having regard to NPO 3, 6, 13 and 35, the planning authority is required to:

- (i) provide relevant information to show that the draft Plan is consistent with the Specific Planning Policy Requirements (SPPRs) specified in the *Urban*

- Development and Building Heights Guidelines for Planning Authorities* (2018) by more fully demonstrating consistency with SPPR 1; and
- (ii) provide relevant information to show that the draft Plan includes residential density standards fully consistent with the residential densities set out in the *Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities* (2012) and *Circular NRUP 02/2021 Residential Densities in Towns and Villages*.

### **3. Approach to Development**

#### **3.1 Galway Metropolitan Area – Co-ordination with Galway County Council**

The ambition for the growth of Galway to drive regional development in the NPF and metropolitan area as part of the MASP provides both a challenge and opportunity for the city.

Collaboration and co-operation between Galway City Council and Galway County Council in terms of their spatial plans will be crucial in terms of prioritising investment in infrastructure and delivering on the vision for Galway set out in the MASP.

In this respect, the Office welcomes the inclusion of Table 1.7 ‘MASP Strategic Growth Areas’ which demonstrates the strong linkages at a strategic level to settlements in the county. Having regard to section 9(4) of the Act, the Office considers that the draft Plan, provides the opportunity to co-ordinate the objectives for the MASP. This is particularly the case in relation to land use zonings, identification and delivery of infrastructure priorities, and sustainable transportation on the edge of the City boundary.

The Office also considers that there is a need for more detailed co-ordination in terms of the integration of land use and transport policies for the connected metropolitan settlements of Ardaun, Gaurran, and Briarhill. In this respect, the Office has concerns as to whether the use of a non-statutory framework plan is an appropriate vehicle to guide the development of such an extensive land bank in a MASP location.



Consideration should be given to the preparation of a Joint Local Area Plan, which would provide for detailed consideration of infrastructure capacity or constraints and their resolution, and better integration of sustainable transportation (not only rail, but also bus, cycling and walking modes).

### Recommendation 7 – Co-ordination with Galway County Council

Having regard to section 9(4) of the *Planning and Development Act 2000* (as amended) and to the requirement for a sustainable settlement and transportation strategy under section 10(2)(n), the planning authority is required to coordinate the objectives of the development plan with those of Galway County Council to:

- (i) review land use zonings on the edge of and contiguous to the boundary of the city council in accordance with the principles of compact growth; and sequential approach to development, and tiered approach to zoning; and
- (ii) prepare a joint Local Area Plan or at the least a joint strategy to form part of the draft Plan, including a transport strategy and/or local transport plan for the connected metropolitan settlements of Ardaun, Gaurran (County) and Briarhill (County). This should also involve engagement with all other relevant stakeholders, particularly TII, NTA, IW, and OPW.

### 3.2 Approach to zoning

The Office considers that the approach to zoning and permissible uses in section 11.2 of the draft Plan is too broad and doesn't provide sufficient guidance on uses that are generally permitted, open for consideration or not-permitted. In this regard, the Office advises the planning authority to have regard to the guidance in the Development Plans Guidelines for Planning Authorities (Consultation Draft 2021).

## Observation 2 – Approach to zoning

Having regard to the Development Plans, Guidelines for Planning Authorities, Draft for Consultation (2021), the planning authority is requested to review the zoning objectives in the draft Plan to provide greater clarity regarding uses that are generally permitted, open for consideration or not-permitted within each of the zoning objectives. The Office advises the planning authority to consider including a zoning matrix in chapter 11 of the draft Plan.

### 3.3 Masterplans and Local Area Plans

The Office notes the mechanisms proposed to provide for the delivery of the housing targets, that includes a range of local area plans, masterplans and spatial frameworks during the plan period, both statutory and non-statutory.

While the Office welcomes the intent to provide for well-planned development of these areas of regeneration and urban expansion, both the *Sustainable Residential Development in Urban Areas Guidelines – Guidelines for Planning Authorities* (May 2009) and *Local Area Plans - Guidelines for Planning Authorities* (June 2013) advise that masterplans can supplement or complement, but not replace, statutory plans.

The Office also advises the planning authority to be cognisant of the potential implications concerning Strategic Environmental Assessment and Appropriate Assessment for masterplans where they are intended to be used to determine the spatial development of land.

The Office also notes the extent of the LAPs, masterplans/spatial frameworks to be provided and the resource implications that this will have for the planning authority. The Office considers that a schedule for the prioritisation of these plans and timetable for preparation consistent with the revised core strategy and Recommendation 1 above would provide greater clarity and certainty regarding delivery.

Early consultation with stakeholders such as Irish Water, TII, NTA, and the Department of Education should also be prioritised.

#### 4. Rural Housing

Notwithstanding the positive policy context to support compact growth and regeneration within the City, very significant pressure for urban generated housing is evident in the rural hinterland.

Continuing this pattern of development represents a real risk of undermining more sustainable growth in areas less dependent on the private car and the environmental costs of development in unserviced areas including water quality, loss of biodiversity and landscape sensitivity.

Policy 5.10 provides for limited residential development in 'A' zoned agricultural lands which appears to be limited to circumstances where 'a convincing case of need is established' or to immediate members of families of persons who are householders and residing in the immediate area and to farmers and the immediate members of their families.

Section 11.12 Agricultural Areas addresses residential development on agricultural lands zoned 'A'. It contains a list of criteria to be met regarding minimum site area, access, wastewater treatment etc, however does not refer to the requirement to establish a need as set out in section 5.9 of the draft Plan.

The Office considers, however that the policy regarding residential development on 'G' zoned lands is unclear from sections 5.9 (Agricultural Lands) and 11.2.4 (G Land Use Zoning Objective).

National Policy Objective 19 (NPO 19) states '...In rural areas under urban influence, facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic or social need to live in a rural area and siting and design criteria...'

The Office considers that the rural housing policy in the draft Plan is ambiguous and requires review to ensure consistency with NPO 19 of the NPF. The Office also advises that there may be inconsistencies with the approach to the rural hinterland between the draft Galway City Development Plan and draft Galway County Development Plan.

## Recommendation 8 – Rural Housing

Having regard to NPO 19 of the NPF, the purpose of the Agriculture (A) and Agriculture and High Amenity (G) zoning objectives, and policy 5.10 in the draft Plan, the planning authority is required to:

- (i) review the rural housing policies in the draft Plan to ensure consistency with NPO 19 and in particular the core consideration of demonstrable economic or social need;
- (ii) amend the criteria in section 11.12 regarding residential development on agricultural lands to reference the requirement to establish a demonstrable economic or social need;
- (iii) clarify the rural housing policy regarding residential development on 'G' zoned lands; and
- (iv) review the approach to the rural hinterland in respect of rural housing to ensure that it is co-ordinated with the draft Galway County Development Plan.

## 5. Housing Policies

The Office acknowledges that Section 3.3 of the draft Plan includes a review of Traveller accommodation and notably it is stated that a range of land use zones can accommodate Traveller accommodation. The Office welcomes the inclusion in the draft Plan of policy objective Policy 3.2 to implement the *Traveller Accommodation Programme 2019 – 2024* and to support and facilitate the specific accommodation needs of Travellers.

The Office considers, however, that the draft Plan does not provide implementable objectives for the provision of accommodation for Travellers consistent with the estimated need, and the land use zoning maps do not appear to indicate the location of lands to provide for such accommodation, as required under section 10(2)(i) of the Act.

The planning authority's attention is drawn to examples of good practice identified in the OPR's recent Case Study Paper on this subject matter.

### Recommendation 9 – Traveller Accommodation

Having regard to the requirements of section 10(2)(i) of the *Planning and Development Act 2000*, as amended, the planning authority is required to identify in the Plan the use of particular areas for Traveller accommodation. This will include the identification of specific locations on the land use zoning maps.

## 6. Economic Development and Employment

### 6.1 Employment zoned land

The Office welcomes the particular emphasis in the draft Plan on developing the critical mass of Galway City to drive economic growth across Galway and the broader region. The Office acknowledges and welcomes that the economic strategy for the city supports the preservation and enhancement of the city centre as the primary commercial area within the MASP, and supporting a regional role for a range of retail, commercial, tourism, social and cultural activities. The draft Plan also identifies strategic employment lands in both the city and the MASP area, consistent with the objectives of the NPO 10a and NPO 10b.

The Office is generally satisfied that the economic strategy set out in the draft Plan is consistent with the vision for the metropolitan area in the MASP (RSES). In particular, the delivery of lands for strategic employment at Parkmore and Oranmore is consistent with the objectives of the RSES (RPO 3.6.5). The economic strategy is also supported by the core strategy, which has identified opportunities both in peripheral commercial locations and the city centre.

The more peripheral locations do, however, pose a challenge for achieving a more sustainable modal share and reducing car dependency in these already congested areas. Further policy measures should be introduced to ensure that the transport Demand Management Measures (Section 4.5) and sections 11.9 and 11.10 are strengthened to ensure that development at these locations consistent with



sustainable mobility and the protection of the capacity and efficiency of the national roads network. This issue is addressed under Observation 4 below.

The Office acknowledges and welcomes that the economic strategy in the draft Plan includes new employment opportunities throughout the city, however having regard to the established concentration of employment uses located along the north-east quarter of the city and adjoining suburbs, there is a need to counter balance employment uses to the western suburbs in the interest of sustainable mobility, reducing carbon emissions and addressing climate change, consistent with the objectives of the transport strategy proposed for Galway city and section 10(2)(n) of the Act.

The Office acknowledges Policy 6.1 General Policy 12' which sets out strategic opportunities for job creation at Ragoon/Knocknacarra, however the Office considers that Policy 6.1 'General Policy 12' would benefit from further strengthening to realise this objective.

### Observation 3 – Distribution of Employment Lands

Having regard to section 10(2C)(iii) and section 10(2)(n) of the *Planning and Development Act 2000*, as amended, of the Act and the *Development Plans, Guidelines for Planning Authorities - Draft for Consultation (2021)*, the planning authority is advised to strengthen Policy 6.1 'General Policy 12' in the draft Plan to ensure that there is sufficient land activation mechanisms to facilitate employment generation in the western suburbs of the city.

## 6.2 Retail

The Office is generally satisfied that the retail hierarchy set out in the draft Plan (Table 6.1) is consistent with the core strategy and welcomes the provision of a joint hierarchy for both the City and County areas.

The Office notes that the core retail area for Galway city (Figure 6.4) appropriately focuses retail development in the centre to support the vitality and vibrancy of the

city/town centres and facilitate sustainable travel consistent with the *Retail Planning Guidelines* (2012).

Under the *Retail Planning Guidelines* (2012), paragraph 3.5 ‘Joint or Multi-Authority Retail Strategies’ includes a specific requirement that development plans and local areas plans for the Galway urban area must be informed by a Joint or Multi-Authority Retail Strategy in order to secure plan-led development. The requirement for a joint retail strategy is also set out in RPO 3.7.9 of RSES.

Although Policy objective 6.11 (3) Retail Strategy of the draft Plan includes an objective to carry out a joint retail strategy with Galway County for the area covered by Galway MASP, no timeframe is specified and no policy framework is provided to ensure that a plan-led approach is maintained in respect of development that should be considered in the context of the Joint Strategy.

#### Recommendation 10 - Joint Retail Strategy

Having regard to the provisions of the section 28 *Ministerial Guidelines for Planning Authorities Retail Planning* (2012), and in particular paragraph 3.5 ‘Joint or Multi-Authority Retail Strategies’, and retail strategy for the MASP set out at Policy objective 3.7.9 of the RSES, the planning authority is required to review Policy objective 6.11 (3) Retail Strategy and associated retail policies to include additional policy objectives in the draft Plan to:

- (i) address mechanisms and deliverable timelines to ensure that the Joint or Multi-Authority Retail Strategy for the Galway Metropolitan Area will be undertaken with adjoining relevant authorities; and
- (ii) appropriately restrict further retail provision which should be considered as part of the Joint Retail Strategy until such time as that Strategy is prepared.



## 7. Sustainable Transport and Accessibility

The *Galway Transport Strategy* (2016) supports opportunities that will reduce 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 in greenhouse gases.

The Office welcomes the objectives set out in Chapter 4 ‘Sustainable Mobility and Transportation’ aimed at reversing the modal split to more sustainable forms which will positively reduce carbon emissions thus addressing climate change.

In particular, the Office notes that Policy 4.3 supports modal change targets for walking, cycling, and public transport within the lifetime of the plan and it is understood that these will be set as part of the review of *the Galway Transport Strategy*.

The issue raised above in relation to providing a sustainable transportation strategy in respect of employment zonings is addressed in the Observation below.

### Observation 4 – Sustainable transport

Having regard to section 10(2)(n) of the *Planning and Development Act 2000* (as amended), the planning authority is requested to review the Transport Demand Management Measures (Section 4.5) and sections 11.9 and 11.10 of the draft Plan to strengthen the policy framework to ensure that employment opportunities at edge of centre locations such as Ballybrit, Dangan, Parkmore and Oranmore are consistent with sustainable mobility and the protection of the capacity and efficiency of the national roads network.

## 8. Climate Action and Renewable Energy

### 8.1 Climate Action

*The Draft Guidelines* (2021) place considerable emphasis on climate action (adaptation and mitigation). Balancing growth with sustainable approaches to development, land-use and transportation are key policy decisions to be made

through the development plan. To this end, in responding to the recommendations relating to compact growth (Recommendations 4 and 5), renewable energy (Recommendation 11 and flood risk management (Recommendation 12) will be crucial to ensure compliance with the requirements set out under section 10(2)(n) of the Act and the draft Guidelines (2021).

The overall approach of the planning authority to climate action is set out in Chapter 2, although the inclusion of climate change as a cross-cutting principle of the draft Plan is evident. In particular, Table 2.1, which outlines a summary of climate adaption and mitigation measures in each chapter of the draft Plan, is welcomed.

The Office also welcomes the planning authority's commitment to working with the Atlantic Seaboard North CARO (Policy 2.2 (12)), the implementation of the *Climate Resilient Galway City 2019 – 2024* climate adaption strategy (Policy 2.2 (4)), and the commencement of the preparation of a pilot decarbonisation zone (DZ) at Westside.

Notwithstanding the above, the manner of addressing climate change in statutory development plans is the subject of ongoing policy development. Accordingly, it would be prudent to include an objective in the draft Plan to the effect that an assessment will be undertaken in relation to the implications of the introduction of such future policy mechanisms, with a view to varying the draft Plan as made to ensure consistency with relevant climate assessment and development plan guidelines.

#### Observation 5 – Climate Action

Given the importance attributed to climate action by Government, as evidenced by, inter alia, the recent *Climate Action and Low Carbon Development Act (2021)* and the *Climate Action Plan 2021*, the planning authority is advised that the draft Plan should also include an objective to consider a variation of the development plan within a reasonable period of time, or to include such other mechanism, as may be appropriate, to ensure the development plan will be consistent with the approach to climate action recommended in the *Development Plans, Guidelines for Planning Authorities - Draft for Consultation (2021)* or any other relevant guidelines.



## 8.2 Renewable Energy

The Office notes the support in the draft Plan for increased use of renewable energy and development of renewable energy infrastructure whilst acknowledging that only some renewable energy sources are suitable within the city urban area.

The Office notes, however, that although the potential for examining district centre heating opportunities is referenced in the draft Plan, there is no policy objective to support and/or deliver on the potential of district heating systems within the city area.

The city, as a high density urban environment, has an important role in reducing energy demand and greenhouse gas emissions and to encourage the development of alternative sources of energy, and in this regard the Office considers that the draft Plan could be expanded to include for a range of policies and objectives that support low carbon district heating, waste heating recovery and utilisation and micro-renewable energy production.

### Recommendation 11 – Renewable Energy

In accordance with the provisions of section 12(18) and section 28(1)(c) of the *Planning and Development Act 2000*, as amended, and having regard to the government's commitment in the *Climate Action Plan 2021*, which sets a target of increasing the share of electricity demand generated from renewable sources up to 80% by 2030; National Policy Objective 55 which promotes renewable energy use and generation to meet national targets, the planning authority is required to include specific policies objectives to support low carbon district heating, waste heating recovery and utilisation and micro-renewable energy production for the city plan area.

## 9. Flood Risk Management

The Office welcomes the reference to the section 28 guidelines the *Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)*, the preparation of a Strategic Flood Risk Assessment (SFRA) and the inclusion of a

number of policies such as Policy 5.3 and Policy 9.4 which are key factors in terms of flood migration and climate action.

In relation to the SFRA, however, the flood map provided in the SFRA is of insufficient scale to clearly identify which lands are impacted by flood risk and to assess if the sequential approach has been applied. A revised map should be provided to clearly indicate that this is the case.

The Office commends your authority for the application of a number of Plan Making Justification Tests in the SFRA in accordance with NPO 57 and *the Planning System and Flood Risk Management Guidelines for Planning Authorities*. However, the ‘Sandy Road Regeneration Site’ (section 7.9 SFRA) states that a “*more compressive assessment of risks will be required*”, indicating that this site has not passed the plan making Justification Test.

There are also land use zonings proposed, which are classified as highly vulnerable development in the Guidelines, which overlap with Flood Zones A and B, for which no Plan Making Justification Test has been applied and passed. For example, lands zoned Community, Cultural and Institutional (CF) to the south of Dún Na Mara Drive, and lands zoned for Low Density Residential (LDR) to the south of Coast Road near Curragreen.

To ensure that there is no loss of the flood plain, or that only water compatible development, such as Open Space, would be permitted for on lands which are identified as being at risk of flooding within these sites, a policy objective should be included to require that a flood risk assessment and the sequential approach is applied.

The Office also considers that a reference to the recently published DHLGH ‘*Nature Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document*’ (November, 2021), prepared under the Local Authority Waters Programme, into Policy 9.4 would further strengthen the policy framework in this area.



The Office further considers that point no. 3 of Policy 9.1 should be revised to ensure that the SFRA is fully complied with and that site specific flood risk assessments are required in all areas of identified flood risk, as stated in section 11.27 of the draft Plan.

### Recommendation 12 – Flood Risk Management

Having regard to the detailed requirements of *The Planning System and Flood Risk Management, Guidelines for Planning Authorities* (2009), the planning authority is required to:

- (i) provide a land use zoning map of appropriate scale and resolution to clearly outline the sites at risk of flooding and to assess that the sequential approach has been applied;
- (ii) ensure that the plan making Justification Test is applied and passed for all proposed land use zonings, classified as highly vulnerable development in the Guidelines, which overlap with Flood Zones A and B. Sites which do not pass the Justification test should not be zoned for vulnerable development;
- (iii) amend the wording of Policy 9.1 to ensure consistency with section 11.27 of the draft Plan and to ensure that the Strategic Flood Risk Assessment will be fully implemented and complied with;
- (iv) include a policy that requires a Flood Risk Assessment (FRA) and the sequential approach is required for lands zoned for any development proposals where a small proportion of the site is at risk of flooding; and
- (v) include reference in Policy 9.4, or otherwise, to the recently published DHLGH '*Nature Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document*' (November 2021), prepared under the Local Authority Waters Programme.

## 10. Environment, Heritage and Amenities

### 10.1 General

The Office acknowledges the comprehensive and systematic approach taken by the planning authority in addressing the wide range of issues relevant to the protection, preservation and improvement of environmental, built heritage and amenities.

In particular, the inclusion of ‘The Green Network’ in section 5.2, and Table 5.1 and 5.2 ‘Open Spaces within the Green Network’ which alongside Policy 5.1 set out a strong policy framework to support the sustainable use and management of areas of ecological importance within the city area.

### 10.2 Rights of way

Section 10(2)(o) of the Act requires public rights of way to be located on both a map and on a list appended to the development plan.

The Office notes that section 5.7.1 and policy 5.5 of the draft Plan refer to an objective to create and maintain public rights of way for both pedestrian convenience and amenity reasons, detailing walking trails and public rights of way within the county. However, it appears that the Plan does not include an objectives for public rights of way nor are there any maps to illustrate any existing or proposed.

The planning authority’s attention is drawn to examples of good practice identified in the OPR’s recent [Case Study Paper](#) on this subject matter.

#### Recommendation 13 – Public Rights of Way

Having regard to the requirements of Section 10(2)(o) of the *Planning and Development Act 2000*, as amended, the planning authority is required to include inventory and maps identifying public rights of way.

### 10.3 Environmental Reports

The role of this Office is not as a competent authority under article 6(4) of the SEA directive, however within the context of the section 28 guidelines it is appropriate and relevant to comment upon the environmental reporting.





In this respect, the Office considers that there is scope to enhance the integration between environmental reporting and the draft Plan preparation process. For instance, the environmental report does not include any analysis or discussion of the council's deliberations of the draft Plan prepared by the executive or any analysis of the directions or motions of the elected members in the process of the draft Plan for public display.

#### Observation 6 – Environmental reporting

The planning authority is advised that in order to give full meaning to the strategic environmental assessment process as set out in the directive, it should ensure that as/when material amendments arise, the environmental reporting is iterative and transparent with the decision-making process at that stage.

## 11. Implementation and Monitoring

The inclusion of a strategy for implementation and monitoring in Appendix 1 of the plan is welcomed. This is particularly important given the emphasis on monitoring and implementation in the recently published draft Guidelines (2021). In particular the draft Guidelines (2021) recommend a monitoring task for the strategic functions relating to Core Strategy Monitoring and Plan Objectives Monitoring.

The Office advises that a more targeted and detailed approach to implementation and monitoring could be provided to focus on the anticipated or proposed key outcomes of the plan, as determined by the planning authority, such as the core strategy (e.g. population growth and housing delivery), urban and rural regeneration, the sustainable transport strategy (e.g. modal share, preparation of Local Transport Plan), climate action (e.g. renewable energy development, biodiversity and landscape (e.g. status of designate habitats) and others.



### Observation 7 – Implementation and monitoring

Having regard to the commitment of the planning authority to securing and monitoring the implementation of the strategies, policies and objectives of the draft Plan, the Office requests the planning authority to consider how Appendix 1 'Implementation and Monitoring' could be amended to ensure that any monitoring is strategic in nature consistent with Part 10 of the *Development Plans Guidelines for Planning Authorities - Draft for Consultation (2021)*.

### Observation 8 – Standardised Zoning Objectives

Having regard to the recently published *Development Plans Guidelines for Planning Authorities – Draft for Consultation (2021)*, the planning authority is advised to review the zoning objectives in the draft Plan to adopt the standardised zoning objectives in Appendix B of the Guidelines. This will assist in providing a consistent approach to zoning nationally and aid the understanding of zoning objectives by the public and the development sector alike.

## Summary

The Office requests that your authority addresses the recommendations and observations outlined above. As you are aware, the report of the chief executive of your authority prepared for the elected members under section 12 of *the Act* must summarise these recommendations and the manner in which they will be addressed.

In accordance with section 12(5)(aa), where the planning authority decides not to comply with any of the Office's recommendations made in the draft Plan and report, they shall inform the Office, by notice in writing containing the reasons for the decision.

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 draft Plan. 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



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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*.

Yours sincerely,

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A handwritten signature in black ink that reads "AM O'Connor". The signature is written in a cursive style with a small flourish at the end.

**Anne Marie O'Connor**

Deputy Regulator and Director of Plans Evaluations

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