

23rd December 2025

Forward Planning Policy Unit,
Galway County Council,
Áras an Chontae,
Prospect Hill,
Galway,
H91 H6KX.

Re: Proposed Variation No. 1 to the Galway County Development Plan 2022-2028

A chara,

Thank you for your authority's work in preparing the Proposed Variation No. 1 (proposed Variation) to the Galway County Development Plan 2022-2028 (County Development Plan).

As Galway County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (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 proposed Variation under the provisions of sections 31AM(1) and 31AM(2) of the Planning and Development Act 2000, as amended (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, planning authorities are requested 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. Planning authorities are advised 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. Planning authorities are requested by the Office to give full consideration to the advice contained in a submission.

On adoption of the Variation, the Office will consider whether the plan has been made in a manner consistent with the recommendations of the Office and whether the plan sets out an overall strategy for the proper planning and development of the area concerned.

Overview

The proposed Variation includes changes to the County Development Plan following the publication of the section 28 NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines).

In this regard, the Office welcomes the inclusion of additional text in relation to the role of the Galway Metropolitan Area, the Key Towns, and tier 2 and 3 towns in terms of housing delivery in locations close to jobs and amenities, so that the county grows in a compact and sustainable manner. The approach to amend the development plan to facilitate the immediate development of Residential Phase 2 lands in these locations is therefore strongly supported in principle.

In order to focus on the most readily available lands and identify sites in more strategic sites within the Metropolitan Area Strategic Plan (MASP) or higher tier settlements which will satisfy the unmet demand and deliver more housing in the near term, the Office makes a recommendation regarding a review of the Settlement Capacity Audit (SCA). The recommendation also includes measures to improve the clarity and transparency of information in the core strategy and SCA.

The Planning Authority is also recommended to ensure the residential density standards for lands at Garraun are updated in accordance with the revised Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) (Compact Settlements Guidelines), and in particular in the vicinity of the Oranmore train station.

The submission below has been prepared to provide a strategic level input to your authority in finalising the proposed Variation. It is within the above context that the submission sets out two (2) recommendations under the following key themes:

Key theme	Recommendation	Observation
Implementation of the housing growth requirements	Recommendation 1	-
Residential density and transport infrastructure	Recommendation 2	-

1. Implementation of the housing growth requirements

Based on the Housing Growth Guidelines, the Planning Authority has correctly stated the new Housing Growth Requirement for Galway County as 2,008 housing units per annum, and 6,024 for the plan period up to 2028.

The Office notes from the Chief Executive's (CE's) Report that there is a potential capacity of 7,490 units remaining in Residential Phase 1 lands for Galway County.

In order to ensure a sufficient supply of zoned land, the Housing Growth Guidelines recommend up to 50% additional provision, which would equate to a requirement for sufficient land to accommodate 9,036 homes for the plan period.

The Office understands from the SCA that the Residential Phase 2 lands within the top four tiers of the settlement hierarchy comprise approximately 305 hectares. The Office also notes that there are additional Residential Phase 2 lands in the five small growth towns and seven small growth villages which will also be made available for development under the proposed Variation.

The County Development Plan as varied would therefore provide residential zoned land for over 18,000 homes, not including the Residential Phase 2 lands in the lower tier towns and villages for which no information regarding the quantum of zoned land or housing capacity is available.

This approach comfortably provides sufficient zoned land, including additional provision, in line with policy and objectives 1 and 2 of the Housing Growth Guidelines, while also ensuring a pipeline of land for development well beyond the lifetime of the plan.

As identified in the Housing Growth Guidelines, the key focus of the proposed Variation should be to ensure that lands that are serviceable or most readily serviceable are prioritised for activation. In this context, the Office has concerns regarding the sufficiency and accuracy of the SCA, and the lack of details regarding the capacity of Residential Phase 2 lands in the lower tier towns and villages. The Office therefore recommends the SCA is further reviewed.

In this context, the Office also recommends a focus on lands within the MASP or lands in higher tier settlements which are accessible to public transport and active travel modes, and which are without infrastructure or flood risk constraints and are deliverable during the lifetime of the plan.

Greater clarity and transparency is also recommended in the presentation of relevant information in a clear and simple manner consistent with section 10(2A) of the Act, and following the approach set out in appendix A of the Development Plans, Guidelines for Planning Authorities (2022) (Development Plans Guidelines) as a best practice guide. This information should include details of:

- the extent of existing zoned lands (Residential Phase 1) (ha);
- the extent of additional zoned lands under the proposed Variation (Residential Phase 2) (ha);
- the capacity/ housing yield for both Residential Phase 1 and Phase 2 (in housing units), the density used to estimate that capacity; and
- the infrastructure capacity and constraints to enable prioritisation of infrastructure investment and delivery for all settlements with Residential 2 lands inclusive of Phase 2 lands in the five small growth towns and seven small growth villages if still proposed as released.

While some of this information was indicated previously within the CE's Report, it would benefit from being drawn together in a revised core strategy table, and the associated SCA.

In addition, the Office has noted a number of anomalies regarding the SCA tables, in that the legend and commentary are not accurately captured and the colour coding of the tables are not explained. Furthermore, the legend and colour shading for the SCA maps do not

match and are unclear. Therefore, in the interests of transparency and accuracy, the Office recommends the SCA tables and maps are reviewed and corrected.

Recommendation 1 - Core Strategy table and Settlement Capacity Audit

Having regard to the statutory requirements for the preparation of a core strategy and the implementation of the housing growth requirements, and in particular to:

- section 10(2A) of the Planning and Development Act 2000, as amended (Act) for the preparation of the development plan core strategy;
- the Development Plans, Guidelines for Planning Authorities (2022);
- the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines), including policy objectives 1,2 and section 2.4 to incorporate the objectives of the Housing Growth Guidelines into development plans; and
- NPO 101, 102 and 103 of the NPF to consider the serviceability of land zoned for development,

the Planning Authority is recommended to:

- (i) revise the core strategy, table 2.9 of the Galway County Development Plan 2022-2028 (County Development Plan) to ensure all statutory requirements under section 10(2A) of the Act are included;
- (ii) provide details of on the quantum (ha), housing yield (units), and density of Residential Phase 2 lands for each settlement, including the lower tier towns and villages;
- (iii) review the Settlement Capacity Audit (SCA) tables to ensure the legend and commentary is consistent and accurate in terms of accessibility to water and wastewater network, all transport modes and active travel network, road access and proximity to public footpaths and necessary social infrastructure; and
- (iv) review the Residential Phase 2 lands in the proposed Variation to ensure the strategy prioritises serviced or readily serviceable lands in areas of high demand such as the Metropolitan Area, Key Towns and larger settlements within the Settlement Hierarchy of the County Development Plan.

The Planning Authority is advised to engage with all relevant prescribed bodies to the review of the SCA, and also to review the SCA maps to provide clarity to legend colour codes and shading applied to all the settlement maps.

2. Residential density and integration of transport infrastructure at Garraun

As referenced above, the Office welcomes the recognition of the important role of the Galway Metropolitan Area in terms of aligning homes and jobs, and of reflecting the existing and planned investment in public infrastructure, including upgrades to the Galway to Oranmore rail service.

The SCA identifies 21 hectares of Residential Phase 2 lands at Garraun which is well located in proximity to Oranmore train station and is within the Urban Framework Plan for the area. With a focus on NPO 10 and NPO 97 of the NPF relating to transport orientated development and the delivery of compact and sequential patterns of growth and new sustainable communities, Garraun is well placed to deliver a new sustainable community in close proximity to public transport infrastructure within the Metropolitan area of Galway.

The Office notes and welcomes the revised insertions at section 3, table 15.1 Residential Density in the proposed Variation. While the Office notes the reference made to the facilitation of higher densities in the Urban Framework Plans within the MASP section, the Office recommends specifying a proposed higher density which align with the Compact Settlements Guidelines and specifically referencing lands in close proximity to the public transport node at Oranmore train station.

Recommendation 2 - Residential Density and land use transport integration at Garraun

Having regard to the integration of transport orientated development with land use planning, and in particular to:

- NPO 10 of the NPF relating to compact and sequential patterns of growth;
- NPO 97 of the NPF relating to the creation of new sustainable communities at greenfield locations in association with major public transport investment;
- section 3.3.1 of the Sustainable Residential Development and Compact Settlement, Guidelines for Planning Authorities (2024) (Compact Settlements Guidelines); and
- the National Development Plan 2021-2030 which identifies that funding supports for the further development of commuter rail in Galway, with significant track and station works proposed for Oranmore,

the Planning Authority is recommended to update the residential densities specifying appropriate ranges based on Compact Settlements Guidelines at section 3.3.1 Cities and Metropolitan (MASP) areas and in particular review the lands in close proximity to the Oranmore train station.

Summary

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

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

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

Is mise le meas,

A handwritten signature in dark ink, reading "AM O'Connor". The signature is written in a cursive, slightly slanted style.

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015
