



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

Our Ref: 200909
Your Ref:

10th September 2020

Submission by Email

Re: Galway County Development Plan 2022-2028 – Issues Paper Consultation

Dear Sir/Madam,

On behalf of our client, Burkeway Homes Ltd, MKO submit to Galway County Council the following comments on the County Development Plan 2022-2028 Issues Paper consultation.

Introduction

Our Client has significant experience in the delivery of major commercial and residential projects in Galway and has a proven reputation in the delivery of developments that meet all relevant planning, environmental and sustainability requirements. Our client builds high-quality homes across the country at densities consistent with the National Planning Framework ('NPF') and the Regional Spatial and Economic Strategy ('RSES'). Such an approach is key to ensuring that suitable lands are developed in the most efficient and sustainable manner feasible, to meet known housing shortages and to achieve aims and objectives of national policy and guidance.

Key National Strategic Outcomes ('NSOs') of the NPF which should be borne in mind in the emerging Development Plan include:

- National Policy Objective 2a: A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs'
- National Policy Objective 3a: Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlement.
- National Policy Objective 3b: 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
- National Policy Objective 4: Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.
- National Policy Objective 13: In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes.



Galway Metropolitan Area Strategic Plan (MASP)

The Northern & Western Regional Assembly (NWRA) adopted the *Regional Spatial and Economic Strategy* (RSES) on the 24th January 2020. As part of this RSES, a co-ordinated Metropolitan Area Strategic Plan (MASP) is prepared for Galway Metropolitan area. The RSES amplifies the provisions of the NPF and the MASP sets out the strategic direction the city will grow to achieve compact growth, as envisaged within the first national strategic outcome in the NPF.

As outlined in the MASP, in Section 3.6 of the RSES, the Galway Metropolitan Area (GMA) has considerable land capacity that can significantly contribute to meeting the housing demands based on population targets set out in the NPF and RSES. The targets are as follows (*per* section 3.6.3.1 of the RSES):

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

The Galway Metropolitan Area is the primary centre identified for growth in the north west region. Table 2 below outlines the MASP population targets as set out within Table 3 of the RSES:

Table 1: MASP Population targets (extracted from RSES)

Settlement	Population 2016 Census	% Increase to 2040 (min)	Uplift to 2040	Proposed 2026 uplift (min)	Proposed 2031 Uplift (min)	Transitional Target Population ¹
Galway City	79,900	50-55	42,000	23,000	12,000	115,000

The following Regional Policy Objectives also relates to the population targets:

“RPO 3.2(a) Deliver at least 50% of all new city homes targeted in the Galway MASP, within the existing built-up footprint of Galway City and suburbs.(b) Deliver at least 40% of all new housing targeted in the Regional Growth Centres, within the existing built-up footprint.(c) Deliver at least 30% of all new homes that are targeted in settlements with a population of at least 1,500 (other than the Galway MASP and the Regional Growth Centres), within the existing built-up footprints²”

A number of strategic locations have been identified that present the opportunity and capacity to deliver the necessary quantum of housing to facilitate targeted growth. These strategic locations are summarised on page 53 of the RSES (and set out below) and it is noted that Bearna is specifically referred to in this context:

*“> Consolidation of the existing neighbourhoods of Knocknacarra, Ragoon, Castlegar and Roscam.
> Development of Regeneration Lands at Ceannt Station Quarter, Inner Harbour and Headford Road*

¹ ² Takes into account Transitional Regional and County Population projection to 2031 as set out in the implementation roadmap for the NPF published in 2018

² ³ built up footprint of settlement is that defined by the CSO



- > Ardaun
- > Murrrough
- > Baile Chláir, **Bearna**, Oranmore, Briarhill” [Emphasis added]

Moreover, page 55 of the RSES states as follows in relation to Bearna:

“Bearna is located to the west of the Metropolitan Area, at the gateway to the Gaeltacht na Gaillimhe (County Galway Gaeltacht). It has experienced significant growth in and surrounding the village and is serviced through the Mutton Island Wastewater Treatment Plant. Its location favours future growth that should have a focus that includes the consolidation of built-up areas of the village and the provision of supporting community infrastructure and services that are easily accessible by walking, cycling or public transport. The built, archaeological and cultural heritage of Bearna are important assets that should be conserved appropriately, including the Pier Road Architectural Conservation Area. While there is currently circa 14ha of residential phase 1 lands identified in the Bearna Local Area Plan that can accommodate growth in the short/medium term, there are additional lands available to facilitate further growth. The identification of such lands shall be a matter for the statutory plan-making process and shall have regard to environmental considerations, including flood risk and climate change.”

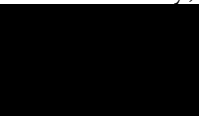
Role of Bearna in the Draft Development Plan

It is submitted that the Draft Development Plan should set out a clear role for Bearna in line with the requirements of the NPF and RSES. It is considered that at present there are conflicting objectives in the development plan that relate to Bearna. Specifically, Bearna’s position in the GMA conflicts with the population allocation of 420 people, a housing yield of 130 units and an indicative density of 16 units in the Core Strategy Table on page 45 of the operative GCDP. To support the function of the GMA, sustainable growth must be achieved. Section 5.11 of the ‘Sustainable Residential Development in Urban Areas’ guidelines states that densities in the general range of 35-50 dwellings per hectare should be encouraged on ‘Outer Suburban/Greenfield’ sites associated with cities and larger towns. It is considered, that in order to provide for a development on Residential (Phase 1) zoned lands at an appropriate density (35-50 dwellings per ha), which supports the role of Bearna at the top of the settlement hierarchy, the core strategy allocations should be sufficiently ambitious.

In conclusion, it is respectfully requested that Galway County Council consider the above issues in their preparation of the Draft Development Plan to ensure the emerging Plan provides a strong yet flexible planning framework for future growth. As part of this process, it is considered that engagement with the housebuilding sector is critical to ensure a fit for purpose Plan exists going forward. Our Client welcomes the opportunity to be involved in the shaping of future policy which will in turn shape new developments in the Galway area.

Should the Planning Authority require further clarification or information on any matter raised in this consultation response, please do not hesitate to get in touch.

Yours faithfully,



Colm Ryan, MIPI
Project Director

