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CDP Review
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Galway

Our Ref: 200613
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By Email: forwardplanning@galwaycoco.ie

9th September 2020

Re: Glenveagh Properties PLC –Galway County Development Plan Issues Paper 2022-2028

Dear Sir/Madam,

MKO have been instructed by their client Glenveagh Properties PLC to prepare and lodge a response to the Galway County Development Plan Issues Paper 2022-2028. Our client welcomes the opportunity to engage with the Development Plan process at this early stage.

The Issues Paper notes several Key Challenges faced by the Council going forward over the new Plan period which it is considered are important considerations in the formation of a new and updated planning framework. These include:

- *Growing the metropolitan area and other settlements within the County to achieve Compact Growth.*
- *Living in the future and how it will be different.*
- *Reducing our carbon footprint and achieving the national target of zero emissions by 2050.*
- *Living sustainably without compromising future generations.*
- *Accommodating the needs of an ageing population.*
- *Providing sufficient physical and social infrastructure to support economic development and to enhance our quality of life.*
- *Promoting town and village centre vibrancy and vitality with multi-functional uses including entertaining, living, gathering, working, shopping etc.*
- *Building on the provision of high-quality employment and economic opportunities at appropriate and sustainable locations.*
- *Delivering a balance between social and private housing.*

Our Client is taking an innovative approach towards the planning, design and building of high-quality homes at densities consistent with the National Planning Framework ('NPF') and the Regional Spatial and Economic Strategy ('RSES') for the Northern and Western Region. Such an approach is key to ensuring that suitable lands are developed in the most efficient and sustainable manner feasible, to meet known and expected housing shortages and the aims and objectives of national policy and guidance to address same.

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

- *National Policy Objective 3c: Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints.*



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- *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.*

The Northern and Western Regional Spatial and Economic Strategy ('RSES') 2020-2032 states that the North West Regional Assembly ('NWRA') region grew by 7.8% in the period 2002-2006, and in 2006-2011 grew again by 7.9%. The region as a whole had an additional 179,960 persons recorded as living within it as of 2016 compared to 1996. Galway has been the primary beneficiary of population growth in the region, accounting for 38% of the total population increase. The RSES recognises that younger people follow employment opportunities and that compact growth and directing growth in the first instance to urban cores is an important means by which to ensure continued growth. The RSES therefore finds placemaking, education, training, innovation and skills to be amongst the key enablers for the region.

The RSES cites the research undertaken to inform the NPF, which expects that there will be (inter alia) *"a continuation of sprawling growth, a degraded environment and a continuing disparity between where people live and work, with increased commuting times, exacerbation of rural and village decline and uncompetitive cities and urban areas."*

The growth ambitions of the RSES therefore include compact growth, building a competitive and productive economy; supporting further investment in sustainable transport measures; build on the 'liveability' of the region with a commitment to inclusive and sustainable growth. This delivers on the requisite direction from the NPF at national level.

While there is focus on significant growth of the urban centres of Galway, Letterkenny, Sligo and Athlone, the RSES adds that *"these places need to be underpinned by the network of towns that perform a support role in providing regionally strategic employment development of significant scale."* This is supported and it is acknowledged that the new Plan for the County must secure this for its towns and villages.

The target population growth for Key Towns in the RSES to 2040 is at least 30%, while the Regional Growth Centres stands at 40%, relative to the Census 2016. The recognition in the RSES that these targets need to be matched by the delivery of key infrastructure is key and must be further facilitated by the Development Plan emerging.

The following Regional Policy Objectives of the RSES are therefore important to note:

RPO 3.1

Develop urban places of regional-scale through:

- *Delivering on the population targets for the Metropolitan and Regional Growth Centres through compact growth;*
- *Delivering significant compact growth in Key Towns; and*
- *Developing derelict and underutilised sites, with an initial focus within town cores.*

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 footprints..

The Galway MASP area has a significant community catchment as illustrated in Figure 20 of the RSES. There is a target of additional population growth for the MASP area of 27,500 by 2026 and a further 14,500 to 2031. The NPF, as reiterated in the RSES, identifies a targeted population growth to more than 1 million people - 180,000 more than in 2016 - in the RSES region as a whole by 2040.

Issues Paper

Core Strategy and Housing - Key Questions Posed

The Council intends that the emerging Core Strategy of the new Development Plan will “aim to identify where future residential development should be prioritised and reserve an appropriate amount of land in those locations to meet housing and population targets.” It is held that the Core Strategy must be unequivocally clear in its direction, thereby providing clarity and certainty to communities and prospective developers alike to deliver housing across the County. The Core Strategy must also ensure it contains in-built flexibility to facilitate additional population growth over the Plan period should the need arise.

The Settlement Hierarchy set out (that which currently exists under the extant County Development Plan 2015-2021), places the Galway Metropolitan Area and Galway City as the Tier 1 settlement. The ‘thriving’ settlements of Oranmore and Bearna are also included in this Metropolitan area but are located in the administrative boundaries of Galway County. The Hierarchy as currently written includes a longer term plan to develop the Ardaun and Garraun areas to contribute to the Metropolitan area. Should the aim of the new Plan be to include the same Tier 1 settlements as those in the extant Development Plan, considerable efforts will have to be made to align delivery of key infrastructure to allow Ardaun and Garraun to contribute as is envisaged. GCC must engage in a proactive manner with statutory undertakers such as Irish Water and other infrastructure providers to ensure wider objectives of the RSES are met.

Q: How best can the County Development Plan cater for the projected population growth in the County over the lifetime of the plan?

The emerging County Development Plan must take full account of the direction within the NPF and RSES documents with regards catering for the future population of the area i.e. actively planning for the targeted population growth in terms of development lands, infrastructure, services and facilities. It must also, per the NPF, achieve a more balanced growth approach while ensuring established economic drivers and demand areas such as the MASP area are adequately provided for and resourced to ensure they continue to drive the region. To that end a significant focus will be on the MASP area but this should not be to the detriment of other settlements. In responding to the requirements of the national and regional plans, the Development Plan must ensure efficient use of land which it acknowledges is a “limited valuable resource”. The links between efficient use of land with the more intricate Development Management Standards of the Plan are critical, and must be reviewed alongside one another given the Standards ability to achieve better use of land. Please refer to the related responses outlined below.

Q: Where should the increase in population within the County be directed?

The MASP area - a key growth location - includes the Galway County settlements of Oranmore, Baile Chláir and Bearna. These will therefore benefit from their proximity to the City of Galway and being



within the overall MASP area. The metropolitan area straddles the boundary with Galway City Council therefore the Issues Paper advocates “*close collaboration in delivering housing and jobs within the metropolitan area*” which is supported.

Q: Development land is a limited valuable resource. How best do we maximise the development of appropriate land to create sustainable communities?

Compact growth is now a requirement for the Plan area going forward. Objectives of the NPF require 40% compact growth within the existing footprint of built-up areas making better use of identified land and buildings. In that vein, to achieve best use of land which can deliver compact growth, the emerging Plan must contain flexible policies and standards which move away from the rigidity of a ‘one size fits all’. The planning framework emerging must take cognisance of feedback from housebuilders and developers at these key consultation stages to ensure that the overall aims and ambitions of the RSES and NPF are achieved.

Q: Is there a deficit in the provision of a particular type of housing that should be addressed eg. apartment, duplex etc?

The National Planning Framework emphasises the need to build resilience into housing, focusing on homes that can accommodate changing needs over its lifetime (National Policy Objective 34). The RSES supports through Policy RPO 7.19 “*provision of a lifetime of adaptable homes that can accommodate the changing needs of a household over time.*” To ensure sustainable resilient communities are created it is imperative that the emerging policy framework for the coming 6-year period remains flexible to meet changing demand and market fluctuations.

The changing household size and demographic will impact on the type of housing provided and to respond to these future changes, some degree of flexibility in planning and standards will be required. In order to deliver high quality units whilst maintaining residential amenity, a new approach to housing design and the flexible application of development management standards will be required going forward.

The new and innovative housing model proposed by our Client caters for the needs of different age profiles from those buying their first home to retirees all within the same development, reflecting the RSES and NPF. This Plan review process presents an opportunity for the Planning Authority to ensure the correct policy framework is in place to allow this to happen on the ground.

Q: What contributes to an attractive residential environment?

To encourage people to live in the local area and thereby create sustainable communities, the emerging Development Plan must ensure it provides for a range of homeowners. As touched on above, the RSES states that residential design will need to move from “*traditional density-led development*” to one where “*integration with other land uses is given weight.*” Speed and quality of construction are specifically highlighted in this context. Our Client is supportive of this stance. There is onus on the construction industry to deliver high-quality places however the site zoning process at Development Plan level plays a significant role in achieving strong places and spaces, as does the associated Development Plan standards.

Local context and demand profile will have to drive what the market ultimately delivers, and while this can flex and respond to a degree, ultimately the planning policy framework in play will equally have to have a degree of flexibility enshrined in it.

Our Clients response to the above has been to devise a range of housing typologies which first and foremost provide sustainable, liveable, welcoming and adaptive places to live. In doing so, compact growth is delivered along with a hierarchy of open spaces and environments which are not car-dominated. New homes need to be flexible to meet the needs of a range of household types and sizes, and to meet individual households’ changing needs over time therefore a ‘one size fits all’ approach will not work into the future. Our Client’s approach accords with the thrust of national, regional and local policy, providing appropriate densities and tailored urban design can facilitate the framing of streets,



enable the creation positive spaces and places and enhance community through the inclusion of shared surfaces which can give priority to the pedestrian. Own-door housing can provide for better consumer choice and a more viable product. The use of contemporary and innovative design solutions should be encouraged with a flexibility in the application of development management standards.

Q: How can the plan best address increased residential densities?

As noted above, a greater choice of housing type with adaptability built-in will serve to retain a population and encourage others to locate in the Plan area. Urban areas can best accommodate increased residential density while also providing sustainable vibrant communities by moving away from the application of rigid Development Management Standards which has long been the standard response to all development proposals.

The review of the Development Plan presents the Authority with the opportunity to ensure the emerging policy framework is fully informed and fit for purpose. In that vein the National Planning Framework recognises that there is a clear requirement now to focus on how best to deliver a range of housing types in urban areas, at increased densities to make best use of land. There is a renewed focus on increased building heights to assist increased residential densities, however there are other means such as innovative housing design, facilitated by a relaxation in Development Management Standards, which must be part of the conversation.

To deliver the NPF's target to continue to promote compact growth and meet the RSES aims of creating high quality vibrant settlements, the Authority should give consideration to the following when drafting Development Plan policy:

- Looking beyond the conventional 3/4 bed semi-detached and apartment model Ireland has become accustomed to.
- Consider innovative design principles to own door houses that facilitate higher density, appropriate levels of public and private open space provision, car parking, bike and bin storage ensuring that residential amenity is maintained.
- The need to provide market and affordable homes that meet the varied needs of our communities, from students to families to older people.
- The need for more homes that are flexible in terms of their accessibility and adaptability.
- How housing design responds to changing lifestyle demands e.g. working from home.
- Building new communities in which people want to live requires considerable master-planning to ensure we have the right mix of homes in terms of sizes, types and tenures.
- In reviewing how existing Development Plan Standards function, and what they in fact give rise to in the built form, consideration should be given to how open space is dealt with within proposed developments. The current and frequently prevailing guidance focuses on the delivery of single, large open spaces within schemes. These are commonly not utilised by residents, do not present opportunity for community integration and cohesion and often remain un-maintained. A more pragmatic approach is suggested as part of the innovative house typologies being devised by our Client. Usability and functionality of spaces in new developments needs to be considered in more detail, and potentially in the context of existing spaces in the wider vicinity. Smaller better designed 'pocket parks' can result in more vibrant spaces with better community interaction. A series of spaces can assist in the creation of different character areas within a development. While every space need not have a prescribed function, the practicality of the space and its attractiveness to residents and communities should be a consideration in the emerging Plan, and be supported by suitable guidance/policy which is capable of adapting and flexing to the specific site requirements in question.

In order to achieve the aims of the RSES while ensuring the resulting places created over the Plan period are fit for purpose, the Council's policies and Development Management Standards should allow for a degree of flexibility, focusing on design led and performance-based outcomes, rather than applying absolute requirements in all cases. Our Client welcomes the translation of this sentiment into the emerging policy framework.



The Issues Paper does not include density proposals, however in the context of the NPF and RSES which advocate compact growth, balanced against the geographic and economic challenges of the Plan area, it would seem logical to ensure the density ranges prescribed in any emerging Plan are balanced, realistic and flexible to accommodate all scenarios. The approach to density in the extant Development Plan under Objective UHO 11 - Development Densities is considered a sufficiently broad approach to allow densities to be arrived at on a site by site basis, and having regard to the 'Sustainable Residential Development in Urban Areas' Guidelines or any updated/superseding document.

Density should not be applied in a rigid and inflexible manner.

Urban Living and Placemaking – Key Questions Posed

The areas of Orammore, Baile Chláir and Bearna are to be included in the Metropolitan Area Strategic Plan (‘MASP’) as called for in the National Planning Framework (‘NPF’). The MASP straddles the boundary between the County and City Council administrative areas therefore the Issues Paper rightly notes that close collaboration is required in delivery housing and jobs in the metropolitan area. This statement is supported, however the emerging Development Plan should go further to include the all-important provision of infrastructure such as water and roads, which frequently underpin the ability of lands to be developed fully and in a properly planned fashion. The collaboration between the Council’s must also be extended to other key stakeholders such as Irish Water.

The Issues Paper discusses close integration with public transport and other infrastructure, however presents this in the context of existing rather than planned or proposed. In order to achieve the level of development required across both brownfield and greenfield lands over the lifetime of the Plan, it is inevitable – and this must be reflected in the emerging Plan – that upgrade works and extensions to infrastructure will be required to align with delivery of zoned lands. The Council play a pivotal role in bringing the necessary stakeholders together to ensure delivery is programmed and aligned so as to ensure lands are delivered in a timely manner. This must be reflected in the Plan.

Q: How can the plan support the delivery of a robust (MASP)?

The MASP is defined in the RSES as “*The importance attributed to metropolitan areas for the development of the regions requires the preparation and delivery of a Metropolitan Area Strategic Plan (MASP). This new focus for national development offers an opportunity to build a new dynamism in residential, commercial, social, educational, recreational and infrastructural development.*”

Therefore, the NPF and RSES aims of compact growth need to drive this area. As an area where the growth focus is already concentrated, efficient use of land that can capitalise on existing infrastructure, services and facilities or where upgrades to same are planned to facilitate growth is key. Where deficiencies in these areas are identified the Plan must be sufficiently forward-reaching and adaptable to be capable of addressing these without undue delay. Early engagement with developers and stakeholders is key to facilitating the creation of a robust MASP area which benefits all involved especially the residents and employment population of that area.

Q: How can we make our urban places more attractive for people to live and work?

It is noted that Planning Authorities and An Bord Pleanála are required to apply specific planning policy requirements (‘SPPRs’) of the guidelines, within the meaning of Section 28 (1C) of the Planning and Development Act 2000 (as amended), in carrying out their functions. In that vein, the Urban Development and Building Heights Guidelines for Planning Authorities (2018) includes SPPRs relating to compact growth, densities and building typologies as follows:

“SPPR1: It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:



1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Residential Development in Urban Areas (2007)" or any amending or replacement Guidelines;
2. a greater mix of building heights and typologies in planning for the future development of suburban locations."

In addition, Section 7.10 and 7.11 of the Sustainable Residential Development in Urban Areas Guidelines (2009) make clear how design should be utilised to achieve a strong development response:

- "Qualitative standards should be the real test, and innovative design solutions which achieve good performance standards should be considered on their merits".
- "Innovative dwelling design should be encouraged in order to facilitate the potential future provision of adaptable and accessible accommodation".

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

- National Policy Objective 3c: Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints.
- 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.

That said, in keeping with the thrust of the NPF and the RSES, the emerging Development Plan must ensure that communities are created as opposed to monotonous housing developments with little in the way of social and physical infrastructure. The creation of communities with commensurate levels of social and physical infrastructure is critical in creating vibrant, attractive places where people want to live and remain over the course of their lifetime.

In reviewing how existing Development Plan Standards function, and what they in fact give rise to in the built form, consideration should be given to how open space is dealt with within proposed developments. The current and frequently prevailing guidance focuses on the delivery of single, large open spaces within schemes. These are commonly not utilised by residents, do not present opportunity for community integration and cohesion and often remain un-maintained. A more pragmatic approach is suggested as part of the innovative house typologies being devised by our Client. Usability and functionality of spaces in new developments needs to be considered in more detail, and potentially in the context of existing spaces in the wider vicinity. Smaller better designed 'pocket parks' can result in more vibrant spaces with better community interaction. A series of spaces can assist in the creation of different character areas within a development. While every space need not have a prescribed function, the practicality of the space and its attractiveness to residents and communities should be a consideration in the emerging Plan, and be supported by suitable guidance/policy which is capable of adapting and flexing to the specific site requirements in question.

In order to achieve the aims of the RSES while ensuring the resulting places created over the Plan period are fit for purpose, the Council's policies and Development Management Standards should allow for a degree of flexibility, focusing on design led and performance-based outcomes, rather than applying absolute requirements in all cases. Our Client welcomes the translation of this sentiment into the emerging policy framework.



In conclusion, it is respectfully requested that Galway County Council include in their emerging Development Plan the above recommendations 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 and on behalf of our Client welcome the opportunity to engage with the County Council to discuss in more detail the innovative housing models being progressed.

If you require any further detail or discussion relating to the enclosed submission, please do not hesitate to get in touch.

Yours sincerely,


Meabhann Crowe, MRTPI
MKO Planning

c.c **Glenveagh Properties PLC**

