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CDP Review,
Forward Planning Policy Unit,
Galway County Council,
Áras An Chontae,
Prospect Hill,
Galway City.

7th September 2020

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

A Chara,

I have been instructed by my client **Martin Coyne**, to prepare a submission in relation to the forthcoming “Core Strategy” and “Briarhill Framework Plan” which we understand will form part of the new Draft County Development Plan.

- (1) **Ensure there is a sufficient population allocation within the Core Strategy to accommodate higher density residential development within the “Briarhill Framework Plan” area, in line with MASP growth targets**

1.0 Location & Context

The Briarhill Framework Plan Area is located to the east of Galway City. Presently, the Briarhill area can be described as an edge of city urban location. However, this area is identified for strategic growth purposes. In particular, it is located and within the designated extent of the Galway Metropolitan Area Strategic Plan (MASP), as set out in the Regional Spatial & Economic Strategy (RSES).

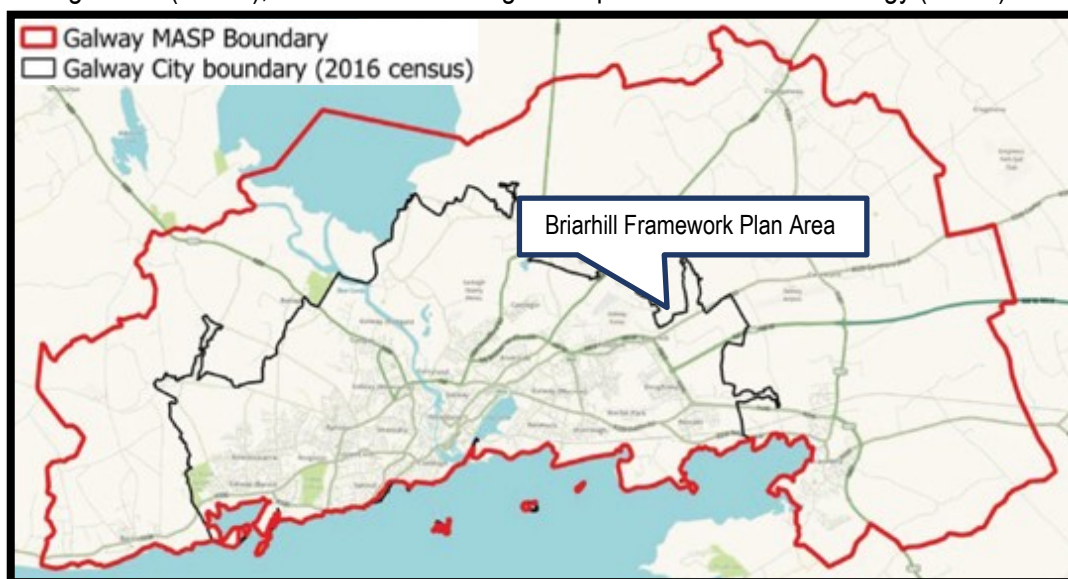


Figure 1: Extract from RSES showing the indicative location of Briarhill Framework Plan Area within the MASP boundary.

The role of MASP and the location of Briarhill within this area is reinforced in the CDP issues Paper. Under the heading “Urban Living & Placemaking” it states that “The National Planning Framework (NPF)

states that provision will be made for a Metropolitan Area Strategic Plan (MASP) that **will focus on delivery of population and economic development.**”

In this context, the Core Strategy needs to be updated to cater for targeted population growth in Briarhill in the forthcoming plan period. For example, my client is the owner of c. 5.21 hectares of lands in the townland of Breanloughaun (Folio No. GY2467). These subject lands are bounded by the Monivea road to the south and the local national school to the south-east. Access to the lands onto the Monivea road is already established, and this access road also serves the National School. The subject lands and the neighbouring lands are currently undeveloped. The subject lands can be fully serviced by the water and sewerage network in the area, which has adequate capacity.

The topography of the site is generally flat which would enable the construction of suitably designed higher density development. The subject lands do not have any built or natural heritage designations on site and are not identified as an area liable to flooding. As such, the lands are entirely suitable for development.

In acknowledgement of the strategic importance of the area, we note that the Planning Authority are currently preparing a “Framework Plan” for the Briarhill Area, which will form part of the forthcoming Draft County Development Plan. The indicative location of the subject lands vis-à-vis the proposed Framework Plan is identified in Figure 2 below.

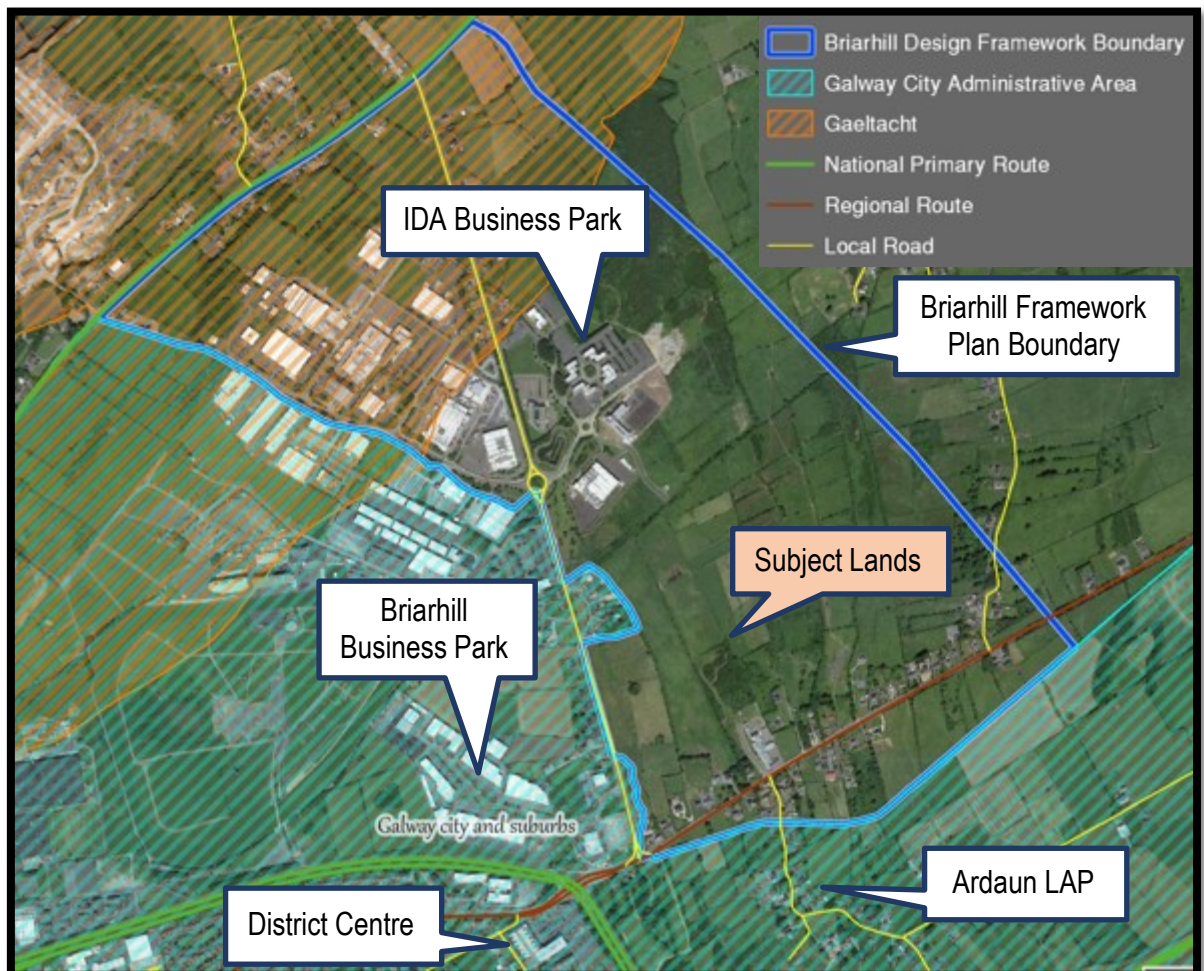


Figure 2: Extent of proposed “Briarhill Framework Plan” Study area (outlined in light blue). The map shows the existing and emerging urban context of the area.

2.0 Strategic Planning Context

Briarhill has a unique urban context and can be described as a strategic settlement, within the Galway Metropolitan Area which is of regional and national importance. The proposed “*Briarhill Framework Plan*” will provide for the delivery of these strategic development lands and will provide for a sequential urban extension to Galway City.

All relevant planning policy documents and statutory plans for the area, identify the strategic importance of lands at Briarhill.

- Under the provisions of the recently adopted RSES, Briarhill is located within the MASP (Metropolitan Area Strategic Plan boundary), where residential growth is specifically encouraged.
- Under the provisions of the current CDP, Briarhill is designated within the Galway Metropolitan Area and is also designated as a small settlement.
- Furthermore, the main growth area for the city (Ardaun) is located directly to the south of the Briarhill area. In this regard, the Ardaun LAP has identified key access links to this strategic growth area, as per Ardaun LAP. This includes the existing access road owned by my client serving the school
- Under the provisions of the Draft Briarhill Action Area Plan, the southern section of the Plan area was earmarked for “Residential” development.
- Moreover, the principle of multiple residential development has already been established on the southern part of the Framework Plan Area. In particular, we refer to Pl. Ref. No. 09/2340 (as extended under Pl. Ref. No. 15/1053). At the time of writing, a new planning application for 43 no. residential units on the southern part of the lands is due to be submitted to the Planning Authority.

These points are discussed in more detail in the grounds of submission below.

3.0 Grounds of Submission

This submission essentially requests the Council to;

- (1) **Ensure there is a sufficient population allocation within the Core Strategy to accommodate higher density residential development within the “Briarhill Framework Plan” area, in line with MASP growth targets**

In this regard, it is considered that the requests outlined in this submission accord with both National Planning Guidelines and the provisions of the Regional Spatial and Economic Strategy (RSES). Compliance with the policy documents, together with the locational advantages of the area are discussed below.

3.1 Locational Advantages of Briarhill

Lands within Briarhill have a number of unique locational advantages to accommodate future development growth. The lands are located at the edge of Galway City within convenient walking distance to a District Centre (Briarhill Shopping Centre), the commercial hub of Briarhill Business Park to the west, and the employment hub of the IDA Business Park to the north). The Briarhill Framework Plan Lands are located within the 50kmph urban speed limit, alongside the main National school for the area, where a service access road & junction onto the R339 Monivea road has been established.

Other locational advantages of lands in Briarhill include the following;

- Lands in the area are serviceable, with the potential to connect to public water mains and public sewer networks.
- This is a highly accessible location, with excellent transport links to Galway City, the M6 (to Dublin) and the M18 (to Limerick) and the N83 Tuam road via the Parkmore road.

- The lands would benefit from its proximity to the future interchange for the Galway City Ring Road (See Figure 3 below).
- The lands at Briarhill are also in close proximity to the former Galway Airport site, which is earmarked for employment use in the future.
- An existing network of pedestrian footpaths, cycle paths, public lighting and safe crossing points along the R339 Monivea road.
- An existing network of pedestrian footpaths, public light and bus stops along the Parkmore Road.
- The road infrastructure in the area has the potential to enable sustainable linkages from the Briarhill lands to retail, commercial and employments hubs in the area.

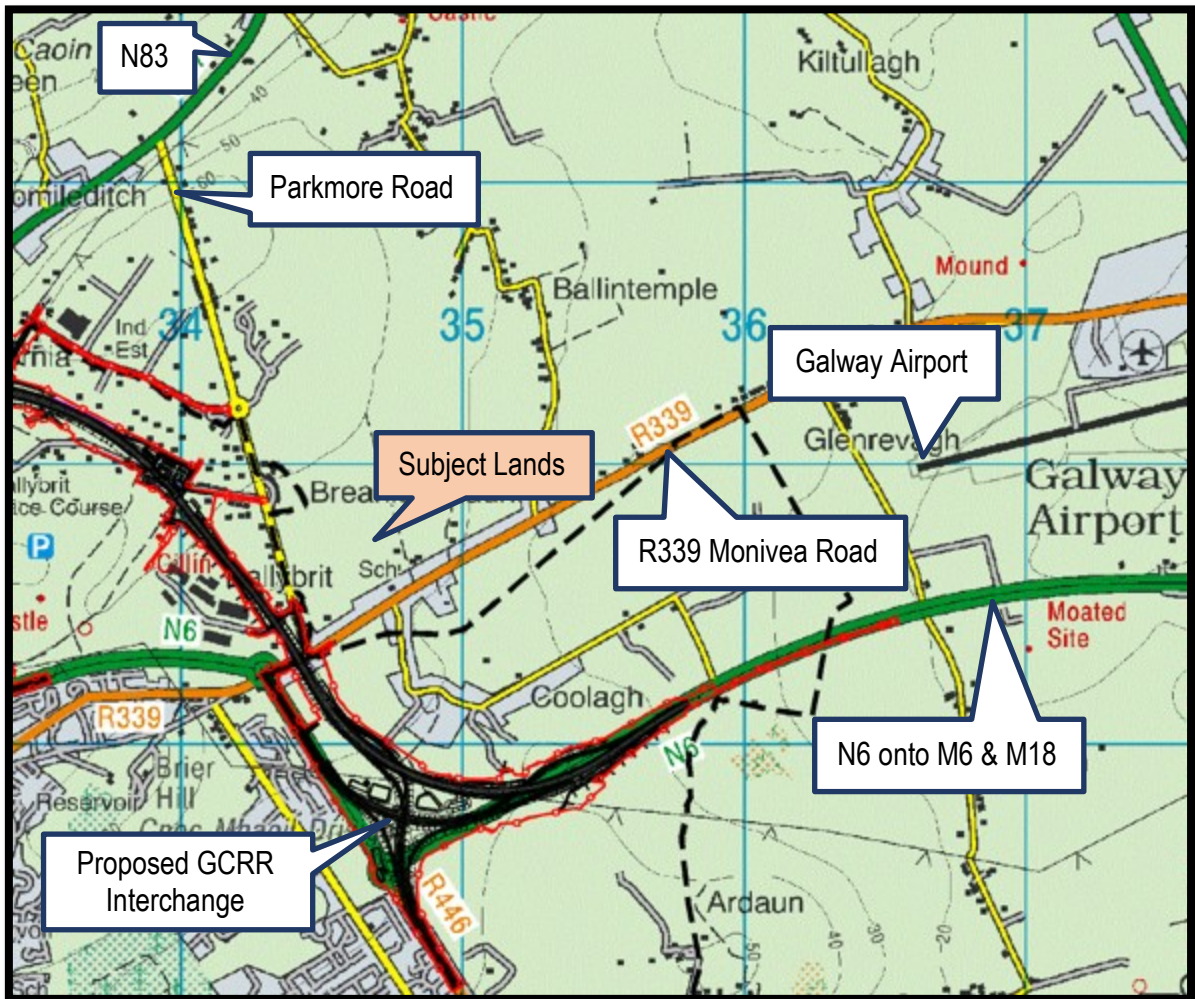


Figure 3: Extract from “Overall Location Plan” of Galway City Ring Road (GCRR) project, showing location of subject lands and proposed interchange, and wider accessibility of the area.

All of the above attributes mean that Briarhill has the ability to accommodate higher density residential development during the plan period. Therefore, the request for a sufficient population allocation within the Core Strategy for the “Briarhill Urban Framework Plan” area, is entirely justifiable in this case.

3.2 Compliance with Regional Spatial & Economic Strategy

The RSES for the Northern and Western Regional Assembly was adopted on 24th January 2020. This replaces the Regional Planning Guidelines 2010-2022 (RPGs). The principle purpose of the RSES is “to support the implementation of the National Planning Framework and the economic policies and objectives of the Government by providing a longterm strategic planning and economic framework for the development of the regions.”

As set out in Figure 1 above, the Briarhill area is clearly identified within the designated “Galway Metropolitan Area”. Once the RSES is adopted it is a requirement of the Planning Act for the County Development Plan Core Strategy “to be consistent with national and regional development objectives set out in the National Planning Framework and the regional spatial and economic strategy.”

More specifically, Section 3.6 of the RSES sets out the “Galway Metropolitan Area Strategic Plan (MASP)”. A statement of compliance with the provisions of Section 3.6.3 of the RSES (i.e. Galway MASP) is outlined in Table 1 below.

Table 1 – Compliance with Section 3.6.3 of the RSES (Galway MASP)

Heading	Policy / Objective Provision	Compliance
<p>Section 3.6.3 – Strategic Growth Areas</p>	<p><i>“Galway Metropolitan Area has considerable land capacity that can significantly contribute to meeting the housing demands based on population targets set out in the NPF and the RSES.</i></p> <p><i>The targets are that:</i></p> <p><i>1. Population of Galway MASP to grow by 25,000 to 2026 and by 38,300 to 2031 with the population of the City and Suburbs accommodating 19,200 to 2026 and 28,000 to 2031.</i></p> <p><i>2. Deliver at least half (50%) of all new homes that are targeted within the MASP to be within the existing built-up footprint.”</i></p>	<p>Briarhill is located within the MASP growth area. As such, the Briarhill areas has the capacity to meet the housing demands based on population targets outlined in the RSES. As such a higher population allocation within the Briarhill area is warranted.</p> <p>The MASP envisages very significant increases in population within the MASP area up to the years 2026 and 2031 respectively. By subtracting the “City and Suburb” population allocation from the overall MASP population allocation, it is possible to identify the population growth target for the outlying MASP area (including Briarhill). This would amount to a projected population growth of 5,800 by the year 2026 and a growth of 10,300 persons by the year 2031. Therefore, an suitable population allocation in the Core Strategy for the Briarhill area is warranted. Furthermore, the consideration of the lands at Briarhill to cater for higher residential development has the potential to modestly contribute towards the achievement of this population projection, and would be entirely consistent with this RSES growth target.</p> <p>The Briarhill Framework plan area, is located within the MASP boundary. As such, the requested increase to the population allocation for the Briarhill area, as part of the forthcoming core strategy, would be entirely consistent with this RSES growth target.</p>
<p>Section 3.6.3 – Strategic Growth Areas</p>	<p><i>“The strategic sites of scale that present the opportunity and capacity to deliver the quantum of housing on the appropriate sites, subject to the adequate provision of services are summarised as follows ... Baile Chlair, Bearna, Oranmore, Briarhill.”</i></p>	<p>This section of the RSES specifically identifies Briarhill as a growth centre to deliver the stated housing targets.</p>

Section 3.6.3 – Strategic Growth Areas	<i>“The Assembly supports the proposition that 50% of new homes for the population targets will be constructed within the existing city development envelope, 40% of these shall be located on infill and/or brownfield sites.”</i>	Owing to Briarhills location within the MASP area, it is most appropriate to accommodate future homes to meet the required population targets.
Section 3.6.3 – Strategic Growth Areas	<i>“The Strategy is to provide for integration of housing with transportation infrastructure fostering sustainable transport patterns. This provides for a co-ordinated approach with investment and the delivery of essential infrastructure, services and community facilities.”</i>	Owing to Briarhills location within the MASP boundary, the consideration of suitable lands for higher density residential development will deliver efficient and sustainable integrated land use and transportation benefits, in accordance with the vision outlined in the RSES.
Regional Policy Objective No. 9	<i>“Deliver on the population targets for the Metropolitan and Regional Growth Centres through compact growth.”</i>	The requested higher population allocation for the area, with the potential to cater for higher residential development, will contribute towards the ultimate delivery of the population targets with the MASP.

The “2020 CDP Issues Paper” acknowledged that the Core Strategy will need to be updated to accommodate the projected growth of the MASP area as set out in the RSES.

In summary, the “Briarhill Framework Plan Area” is strategically located within the MASP Boundary. Accordingly, an adequate population allocation for the Briarhill area, together with the consideration of suitable lands for higher residential development, would in a modest way contribute towards the delivery of strategic and targeted growth in population, as set out in the MASP & RSES.

The strategic location advantages of the Briarhill area is acknowledged in the RSES. As such, an adequate Core Strategy population allocation for Briarhill together with the consideration of suitable lands for higher residential development, would in a modest way contribute towards the delivery of strategic population growth targets, as set out in the MASP & RSES.

3.3 Compliance with strategic aims of current County Development Plan

It is noted that the current County Development Plan (CDP) acknowledges the strategic growth potential of Briarhill. This is provided in “Settlement Strategy Objective” SS1 of the CDP. This objective entitled “Galway Metropolitan Area” states that “Galway County Council shall support the important role of Galway City and the Galway Metropolitan Area (which includes the City area and the Electoral Divisions of Oranmore, Bearna, Galway Rural and **Ballintemple** which are inextricably linked to and function as part of a greater Galway City), as key drivers of social and economic growth in the County and in the wider Western Region and will support the sustainable growth of the strategic settlements, including the future development of Ardaun and Garraun, within the Galway Metropolitan Area.”

Therefore, as Briarhill is located with the Electoral Division of Ballintemple, the potential for the area to accommodate sustainable growth is supported in the current CDP.

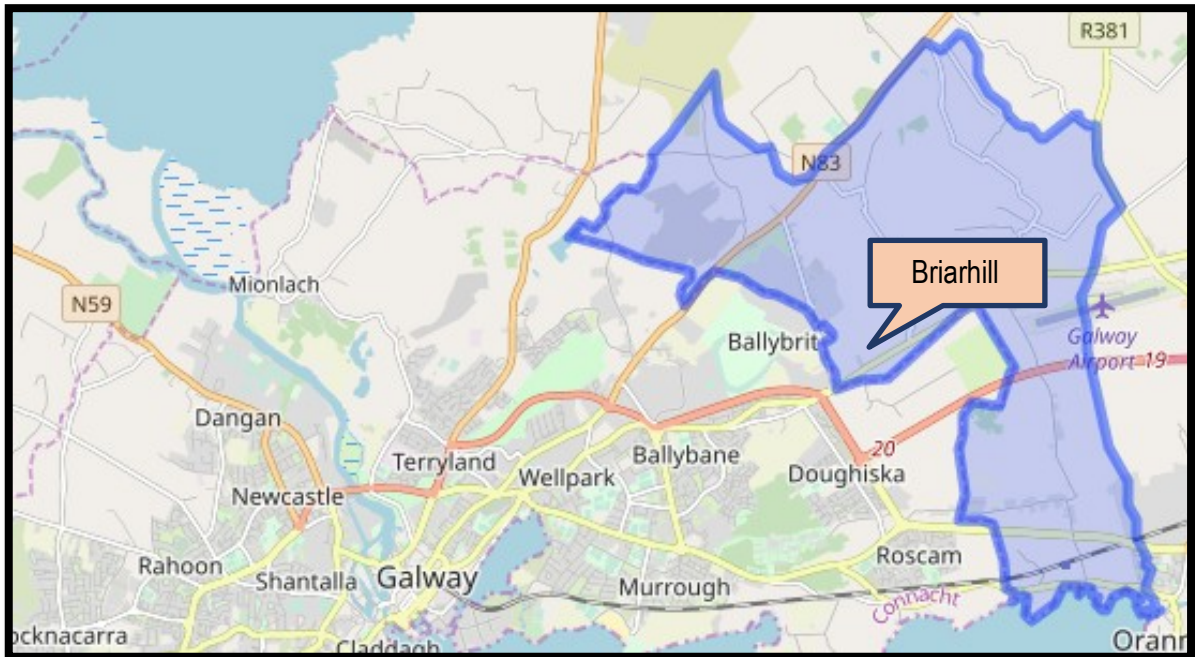


Figure 4: Location of Briarhill within the Electoral Division of Ballintemple (outlined and shaded blue).

Therefore, the existing CDP stipulates that it “shall” support the role and growth potential of the Galway metropolitan area, which Briarhill is situated.

In addition, Section 12 of the current CDP identifies a number of strategic aims for the development of the County. In particular, we refer to “*Strategic Aim 4 – Balanced Urban and Rural Areas*”. This sets out to “**Prioritise development within the Hub town of Tuam, the Galway Metropolitan Area, the key towns and smaller towns, villages and settlements within the County, while supporting the role of the rural areas in sustaining the rural based economy. In parallel, one of the key “performance indicators” of this strategic aim is the “Number of new houses provided”.**

A suitable population allocation for the Briarhill, would assist in the delivery of future housing at this location, in line with the aims of the Development Plan.

3.4 Strategic Link to Ardaun Local Area Plan

The Ardaun LAP was adopted by Galway City Council in 2018. This area is designated to cater for the future growth of Galway city and is located directly to the south of the Briarhill lands. The purpose of Ardaun LAP is to set out a strategy and framework to plan and direct the future development of Ardaun as an ‘Urban Village’ and a sustainable neighbourhood in the city.

One of the key objectives of the Ardaun LAP is the identification of access objectives to enable the development of the zoned lands as well as suitable links to adjoining development lands in the County. In this regard, the Ardaun LAP proposes a “secondary route” to connect the LAP lands with my client’s existing access road (See Figure 5 below). Therefore, my client’s lands are identified as one of the key linkage points between the Ardaun LAP area and future development lands of Briarhill.

In this regard the Section 1.3 of the Ardaun LAP (page 4) states that “*The development framework of the LAP recognises and accommodates additional potential development on land north of the LAP boundary in the County area, previously the subject of development option analysis.*” The accompanying footnote acknowledges that “*Lands were designated a sustainable residential neighbourhood area in Draft Briarhill Action Plan which was prepared in the context of 2003-2009 Galway County Development Plan.*”

We trust the development designation and access objectives in the forthcoming Briarhill Plan will be consistent with the provisions of the adopted Ardaun LAP.

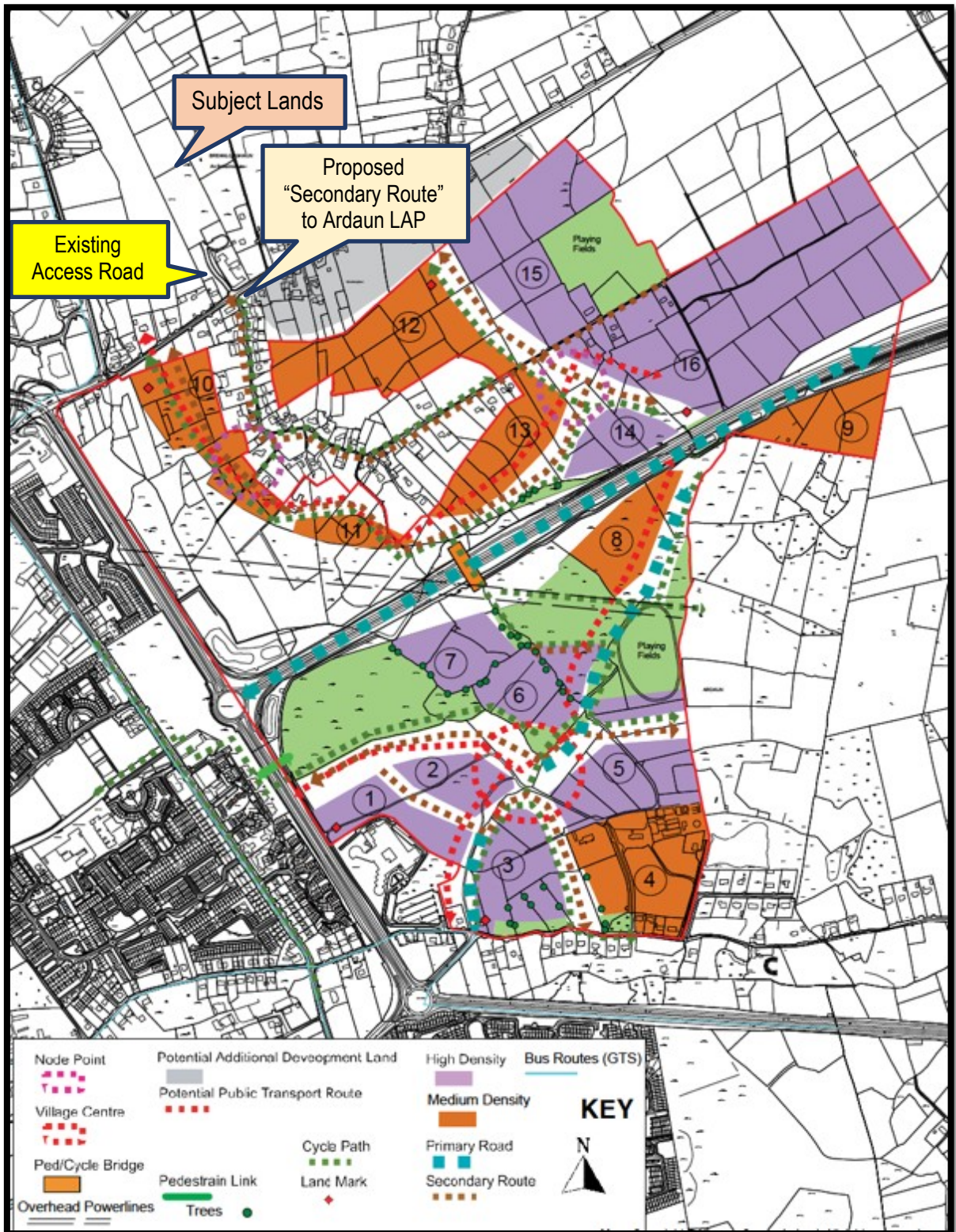


Figure 5: Extract from Ardaun Local Area Plan 2018-2024 (Figure 12 Urban Design Framework), showing proposals for a “Secondary Route” to link the City Ardaun LAP area with the Briarhill Framework Plan area, via the subject lands/existing access road.

3.5 Provisions of former Draft Action Area Plan for Briarhill

The latter draft plan was prepared c. 2005. Although it was never formally adopted, it provided an indicative guide as to where residential and commercial development should be located.

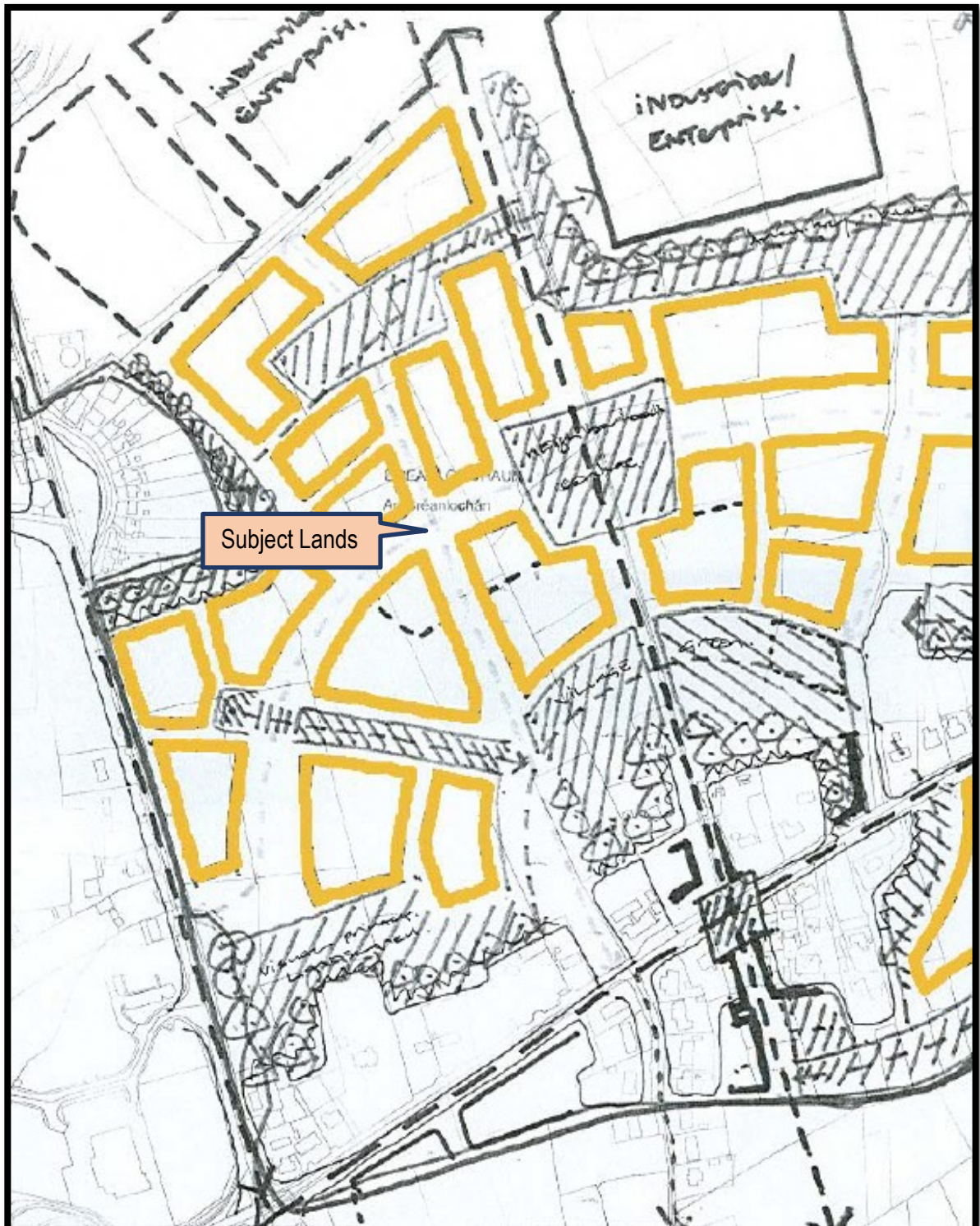


Figure 6: Extract from former Draft Briarhill Action Area Plan (c. 2005) showing location of subject lands, which were earmarked for residential development.

Note: The suggested access objectives to connect to the City “Ardaun” area to the south, have now been superseded by the provisions of the adopted 2018 Ardaun LAP. We would submit that the proposed access objectives for the Briarhill Framework Plan be consistent with the Ardaun LAP, at this location.

3.6 Scope of proposed Briarhill Urban Framework Plan

We understand that as part of the preparation of the 2022 CDP, the Planning Authority has commissioned an “Urban Framework Plan” for Briarhill. This is being prepared in recognition that Briarhill would form part of a metropolitan extension to Galway City. In this regard, we understand that the scope of the “Framework Plan” states that *“Given that the Briarhill area now forms part of the Metropolitan Area, it is anticipated the new Core Strategy for the Galway County Development Plan 2022 – 2028 will have an allocation of population for this area and will be in accordance with the figures contained in the National Planning Framework (NPF) roadmap and the RSES.”*

As such, the allocation of population for this part of the Metropolitan area, as part of the forthcoming Plan, has been acknowledged by the Planning Authority.

In this regard we would be of the opinion that the northern section of the Framework plan would lend itself to employment uses, whilst the southern section would be more appropriate for Residential uses.

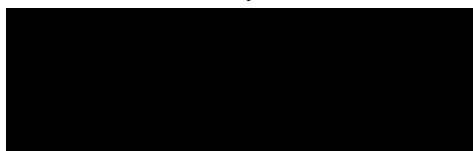
3.8 Absence of Environmental, Natural or Built Heritage Constraints

It is envisaged that the requested population allocation for Briarhill, as recommended in the RSES and MASP, will enable the designation of suitable lands for development purposes, where there are no environmental designations, significant flood risk constraints, archaeological monuments or protected structures on site.

4.0 Summary

On behalf of my client we now look forward to both a detailed and favourable consideration of this submission by Galway County Council. If you wish to clarify any items raised in this submission please do not hesitate to contact me. I would be grateful if you could acknowledge in writing receipt of this submission.

Yours faithfully,



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