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**CDP Review,**  
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Aras An Chontae,  
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7<sup>th</sup> September 2020

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

A Chara,

I have been instructed by my client **Castlegar Development Ltd**, to prepare a submission in relation to the proposed review of the County Development Plan. In particular, this submission relates to the provision for expansion of the IDA Parkmore Business Park, to cater for future employment uses lands within the proposed “*Briarhill Framework Plan*” which we understand will form part of the new County Plan.

This submission essentially requests the Council to;

- (1) **Provide for the expansion of the IDA Parkmore Business park to cater for future employment uses within the “*Briarhill Framework Plan*” / Draft County Development Plan.**

### 1.0 Location & Context

The Parkmore Business Park area is earmarked for strategic economic 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).

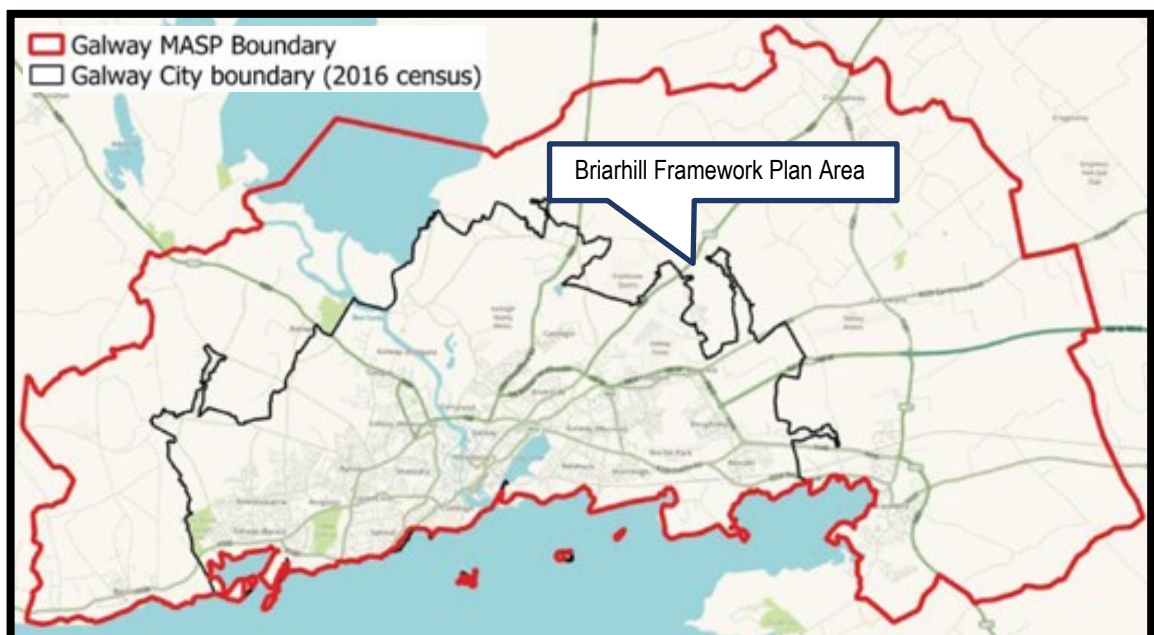


Figure 1: Extract from RSES showing the indicative location of the subject lands within the MASP boundary.

The role of MASP and the location of the “*Briarhill Framework Plan*” 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.***”

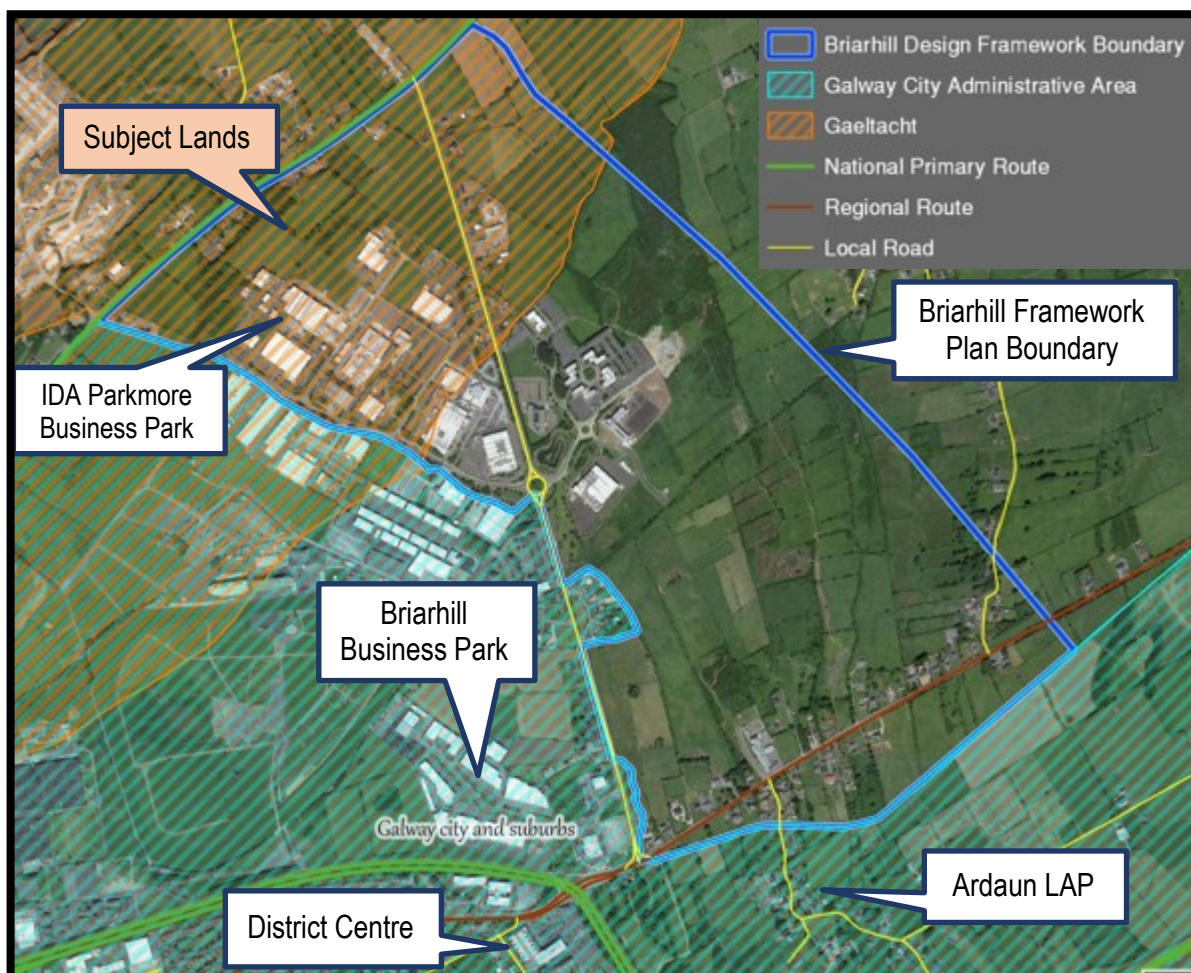
The IDA business park in Parkmore, is one of the largest employment hubs in the west of Ireland. However, its role and status is not mentioned under the provisions of the current County Development Plan. Moreover, opportunities for the expansion of the Business park are not provided for.

For example, my client is the owner of c. 3.57 hectares of lands in the townland of Twomileditch (Folio No.’s GY37452F & GY120619F refer) directly to the north-west of the Business Park.

The subject lands are bounded by IDA development lands to the south and south east, by a row of one off houses to the northwest and undeveloped lands to the east and west. The subject lands and the neighbouring lands are currently undeveloped. The subject lands has the potential to be serviced by the water and sewerage network in the area, which has adequate capacity. The N83 is located further to the north.

The topography of the site falls gradually from south to north. The subject lands do not have any built or natural heritage designations on site and are not identified as an area liable to flooding. Despite the location of the subject lands, there are no provisions under the current CDP to allow for development in locations such as these.

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 extent of the Framework plan area is outlined in Figure 2 below.



**Figure 2:** Extent of proposed “Briarhill Framework Plan” Study area (outlined in light blue). The map shows the extent of the adjoining IDA Parkmore Business Park.

## 2.0 Strategic Planning Context

Briarhill has a unique urban context and can be described as a future urban expansion area, 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 the subject lands at Parkmore & Briarhill.

- Under the provisions of the recently adopted RSES, the subject site is located within the MASP (Metropolitan Area Strategic Plan).
- The MASP specifically identify Parkmore & Briarhill as suitable for the expansion of employment uses

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) **Provide for the expansion of the IDA Parkmore Business park to cater for future employment uses within the “*Briarhill Framework Plan*” / Draft County Development Plan.**

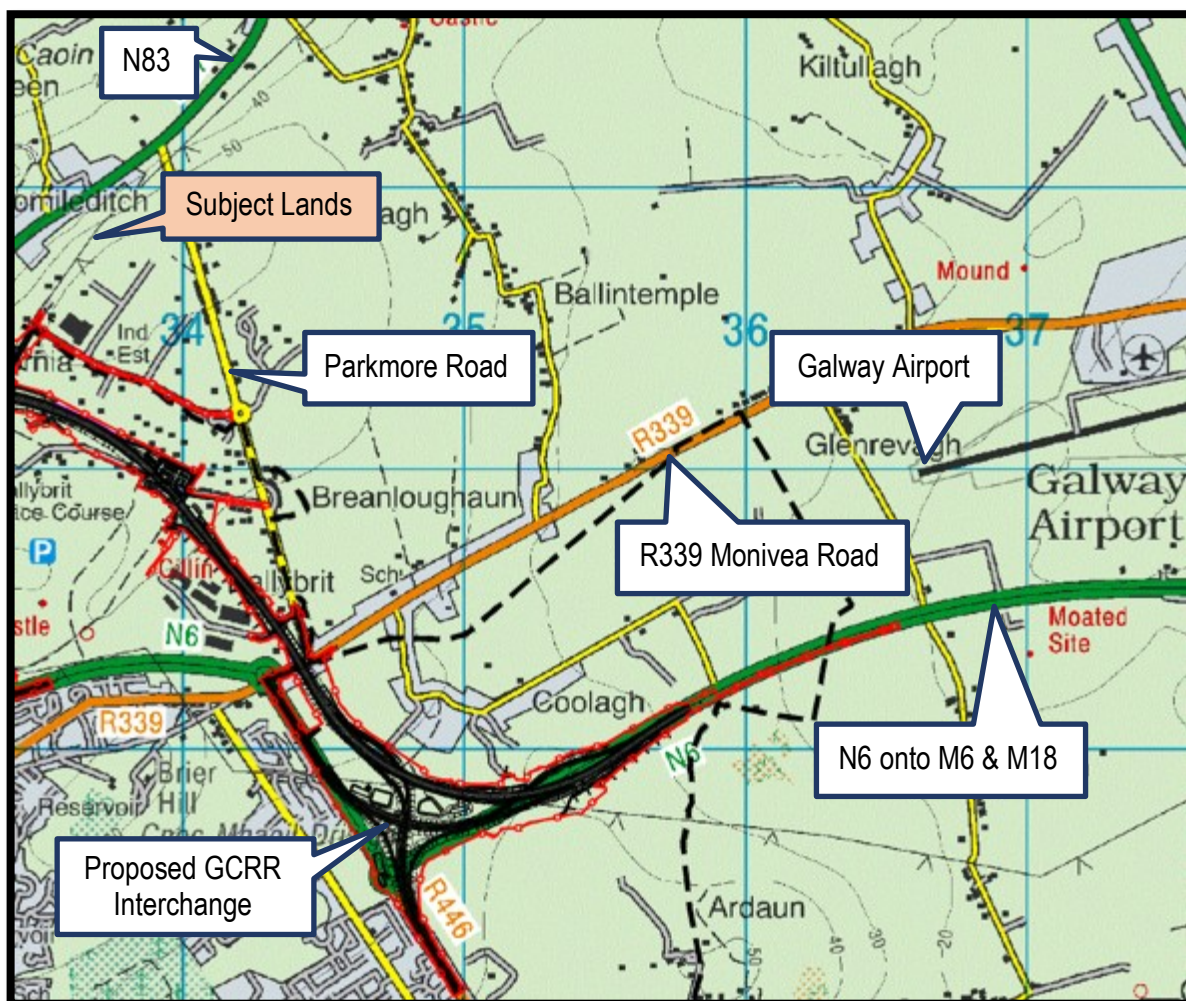
In this regard, it is considered that the requests outlined in this submission accord with both National Planning Guidelines and the provisions of the Regional Spatial and Economic Strategy (RSES). Compliance with the policy documents, together with the locational advantages of the area are discussed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

#### 3.1 Locational Advantages of Briarhill

Lands within the northern section of Briarhill have a number of unique locational advantages to accommodate future economic development growth. The lands are located at the edge of Galway City directly adjoining the employment hub of IDA Parkmore business park, as well as the commercial hub of Briarhill Business Park and the Briarhill Shopping Centre (District Centre) further to the south.

Other locational advantages of the northern section of the Briarhill Framework Plan lands include the following;

- The lands have the potential to be serviced by public water mains and public sewer networks.
- Lands 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 also earmarked for employment use in the future.
- An existing network of pedestrian footpaths, public light and bus stops along the Parkmore Road. This infrastructure has the potential to enable sustainable linkages from the subject lands and retail, commercial and employments hubs in the area.
- The potential dedication of southern section of the Framework Plan area to cater for accessible residential and neighbourhood centre areas, would enable the achievement of sustainable and integrated land use and transportation benefits.



**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 means that lands in the northern section of the Briarhill framework plan area have the ability to accommodate future employment uses, in keeping with the established IDA business Park located directly alongside. Therefore, the request for employment uses/expansion of the IDA business park under the provisions of 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 24<sup>th</sup> 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, Briarhill 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.

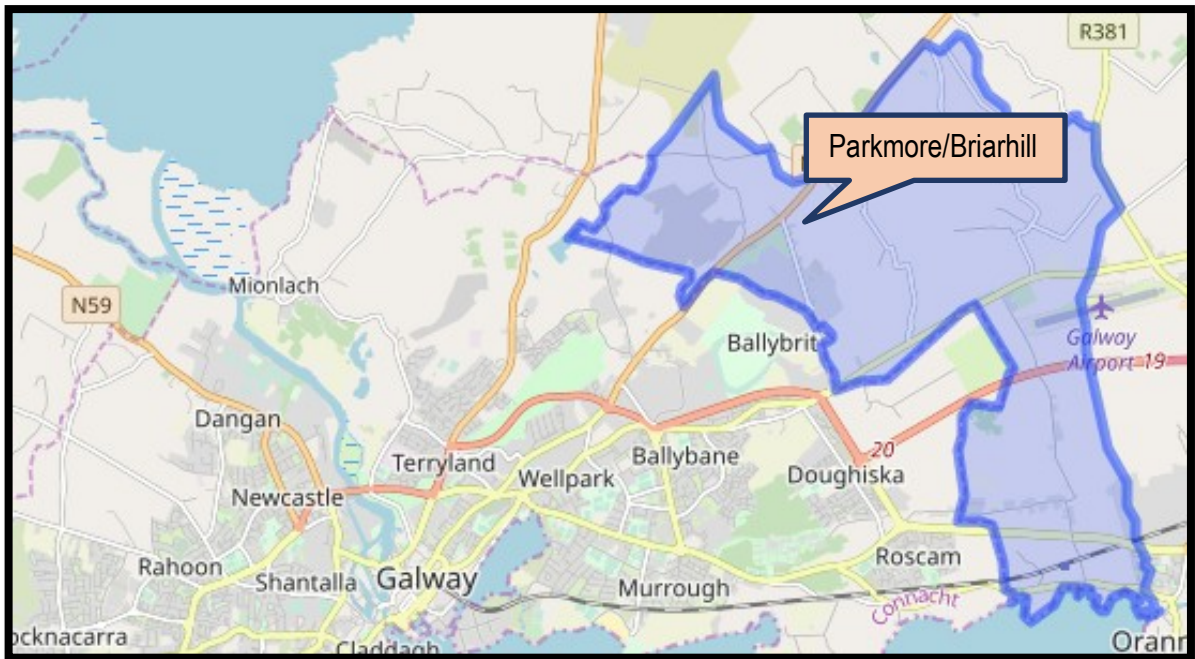
**Table 1 – Compliance with Section 3.6.3 of the RSES (Galway MASP)**

Heading	Policy / Objective Provision	Compliance
<p><b>Section 3.6.3.3– Economy and Employment Locations</b></p>	<p>As part of the MASP, and under the sub-heading “Industrial &amp; Commercial Lands” it states that;</p> <p><i>“Outside of the city centre, the focus is to prioritise investment and expansion in high tech manufacturing, research and development at existing strategic key locations at Mervue, <b>Parkmore, Briarhill,</b> and Dangan. These areas have a strong FDI presence which is reflected in the manufacturing industries including the medical technologies sector and the internationally traded ICT services and software sectors. These areas have the potential for additional employment opportunities with good opportunities for expansion through densification and re-organisation. There are also opportunities for growth in the general manufacturing and commercial/ trade sectors on these lands.”</i></p>	<p>This section of the MASP specifically identified Parkmore and Briarhill as having potential to accommodate expansion of employment uses and opportunities. As such, the northern section of Briarhill has the capacity to meet the targeted employment demands outlined in the RSES.</p>
<p><b>Objective RPO 3.6.5</b></p>	<p><i>“Support the delivery of lands for employment uses at Knocknacarra/ Ragoon, Mervue, Dangan, <b>Parkmore, Briarhill,</b> Airport and Oranmore.”</i></p>	<p>This RSES objective specifically encourages the delivery of employment uses in Parkmore &amp; Briarhill. The facilitation of the expansion of the IDA business park for employment use would be entirely consistent with the RSES objective.</p>

In summary, the subject lands are strategically located within the MASP and the “*Briarhill Framework Plan Area*”. Accordingly, the consideration of the lands to accommodate employment uses, together with suitable access objectives to adjoining greenfield lands, would in a modest way contribute towards the delivery of strategic and targeted employment growth in Briarhill/Parkmore, 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 the subject lands at 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.*”



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

Therefore, the existing CDP stipulates that it “shall” support the role and economic growth potential of the Galway metropolitan area, which the subject lands are situated.

### 3.4 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 “*This Metropolitan Area is a new departure for County Galway and this designation will accommodate a significant portion of population and employment growth in line with the NPF and RSES.*”

Whilst this statement is encouraging, we would consider that the facilitation of expansion of the IDA business park for employment uses would be entirely consistent with NPF/RSES objectives.

### 3.5 Absence of Environmental, Natural or Built Heritage Constraints

It is envisaged that the requested provision for expansion of the IDA Parkmore Business park to cater for future employment uses in Briarhill/Parkmore, 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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