

# Submission on Draft Galway City Development Plan 2023-2029

## 1 Introduction, Strategic Context & Core Strategy

### The Sustainable Development Goals

The inclusion of the Sustainable Development Goals in Chapter 1 is welcome. The draft plan does not focus sufficiently on contributing to Ireland's commitment to achieve the SDGs by 2030.

It is not clear from the draft plan how the policies in each Chapter therein will contribute to the achievement of the SDGs.

### Recommendations:

1. The plan must include measurable targets and timelines.
2. The City Council should identify an appropriate range of indicators from among the SDG Global Indicator Framework
3. That range of indicators should be used to monitor progress towards the achievement of the SDGs

## 2. Climate Action

There is no sense of the required urgency that is necessary to address the existential threat of the climate emergency. The most recent IPCC report delivered a stark 'Final Warning' that we have only 3 years left to commence significantly reducing our greenhouse gas emissions.

There is no sense of the transformational change that is required. The draft plan represents only incremental change from the previous plan. There is no evidence that the draft plan will deliver a just transition in accordance with environmental and social justice.

The Office of the Planning Regulator recently published an OPR Case Study Paper CSP05 - Climate Action and the Local Authority Development Plan. The following is taken from the Study Paper:

"Some of the key building blocks identified in the report for more climate action focused local development plans include:

- **Build More Robust Evidence Bases:** Every local authority development plan should start with an understanding of existing greenhouse gas emissions in that local authority area linking back to the national targets.
- **Set Measurable Targets:** Ireland's overall target to decarbonize, reducing greenhouse gas emissions by 51% by 2030 and net-zero emissions by 2050, needs to be quickly broken down across the local authority areas for clarity in the planning process in the roles local communities must play. For example, a target could be set to ensure that a certain proportion of new housing is located within a certain distance of a public transport node.
- **Identify Co-Benefits:** Local authorities need to recognize and promote the co-benefits of climate action measures. These include the benefits associated with revitalizing and regenerating towns and villages, social and economic development (just transition and local

jobs), biodiversity (rewilding and carbon sinks) and improved quality of life, health and wellbeing (greenways and blueways).

- **Deliver More Consistency in Policy Formulation:** Significant inconsistencies have arisen both within some local authority development plans and between plans of neighbouring local authorities that work against co-ordinated climate action.
- **Adopt Clearer Policy Objectives:** Evidence based and co-ordinated planning approaches across local authorities is vital to inform clear policy objectives that enable proper measurement of progress in implementation. What can't be measured, cannot be effectively monitored.
- **Promote More Collaboration and Partnership:** Development plan preparation in some areas has tended to lead to local controversies in the past around topics like the location of windfarms.”

**Recommendation:**

The development plan must include the above building blocks which are absent from the Draft GCDP.

### 3. Housing and Sustainable Neighbourhoods

#### Residential Densities

If we are to have a compact walkable city we need density. We don't need excessive height to achieve density. The following are two examples of award winning, high-density developments of 82 dwellings per hectare and 410 dwellings per hectare at heights of 2/3 and 5/7 storeys respectively. The densities in the adopted Ardaun LAP are very much lower with medium net density of 30-35 units per hectare and high net density of 35-50 units per hectare.

**Recommendation:** Keep residential building height at 6 storeys or less.

#### Density doesn't necessarily require height!

##### Goldsmith Street, Norwich, UK

2019 Winner of Sterling Prize for Architecture

A Council scheme of 105 homes.

Rows of two-storey houses are bookended by three-storey flats, each with their own front door, generous lobby space for prams and bikes, and a private balcony.

Designed to meet rigorous Passivhaus environmental standards.

Density: 82 dwellings per hectare

[Ardaun LAP provides for medium net densities of 30-35 units per hectare and high net densities of 35-50 units per hectare.]



#### Density doesn't necessarily require height!

##### Camden Courtyards, London

Named 'Best New Place to Live' at London Planning Awards in 2019.

A fully residential scheme comprising 50% private and 50% affordable homes in Camden Town.

There are 164 homes in a development which is 7-storeys high at maximum.

The building is in the shape of an 'S' wrapped around two sheltered courtyards.

Density: 410 dwellings per hectare



## **4. Sustainable Mobility and Transportation**

### **Recommendation;**

Galway City Council should support the Gluas Very Light Rail committee's campaign to have a feasibility study undertaken on a zero-emissions Very Light Rail System for Galway City and the MASP as part of the review of the GTS.

## **5. Natural Heritage, Recreation and Amenity**

### **Recommendation:**

Galway City Council should aspire to achieving National Park City designation for Galway as soon as possible

## **9. Environment and Infrastructure**

### **9.2 Water Quality**

#### **Recommendation:**

Galway City Council should not permit any development where the wastewater collection network is inadequate to convey wastewater arising from the proposed development to the Mutton Island Wastewater Treatment Plant for treatment without activating Storm Water Overflows during rainfall events where the intensity and quantity of rainfall is less than that provided for in 'Unusual Weather Conditions' in Technical Amendment C to the licence.

### **9.4 Water Services**

Due to inadequacies in the wastewater collection network, there are frequent discharges to watercourses from Storm Water Overflows during relatively light rainfall events.

#### **Recommendation:**

1. Galway City Council should work in close liaison with Irish Water to upgrade the wastewater collection network to ensure compliance with Waste Water Discharge Licence D0050-01, and in particular to ensure that all Storm Water Overflows are compliant with the criteria in the DoEHLG 'Procedures and Criteria in Relation to Storm Water Overflows' and thus eliminate all discharges from Storm Water Overflows during rainfall events where the intensity and quantity of rainfall is less than that provided for in 'Unusual Weather Conditions' in Technical Amendment C to the licence.
2. Galway City Council should work in close liaison with Irish Water to provide an adequate wastewater collection network and wastewater treatment facilities to cater for future development on the east side of the city in Oranmore, future development of the Ardaun LAP area, and future development within the MASP on the east side of the River Corrib.

## 9.7 Air Quality

The results from the Air Quality monitor in Eyre Square commissioned in January 2022 are far in excess of the WHO 2021 Guidelines.

### Recommendation:

1. Galway City Council should take whatever measures are necessary to reduce Nitrogen Dioxide concentrations in the air in Eyre Square to below the WHO Guidelines.
2. Galway City Council should arrange to have an appropriate number of air quality monitors installed in Galway City for both Nitrogen Dioxide and Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>) in the interest of protecting public health

## 10. Compact Growth and Regeneration

There is too much reliance on developer-led planning. Developers are required to prepare masterplans. Framework plans, spatial frameworks for a whole range of regeneration and opportunity sites where very significant.

Galway City Council's record in relation to preparation of LAPs over the past 17 years is unimpressive. A LAP for Ardaun was adopted 13 years after it was committed to in GCDP 2005-2011.

There was a commitment to prepare a LAP for Murroogh in GCDP 2005-2011. There is no timeline included in the Draft GCDP 2023-2029 to prepare a LAP for Murroogh. The impression from reading the draft is that its preparation will not even commence before expiry of the period of the draft plan, 24 years after initially committing to it.

There was a commitment to preparing a LAP for the Headford Road area in GCDP 2011-2017. While there is a Specific Objective included in the Draft GCDP 2023-2029 to prepare a LAP for the Headford Road area, there is no timeline for its preparation.

The following are the commitments to prepare LAPs in previous GCDPs and the Draft GCDP.

### **Policy 7.4 Urban Design** (of 2005-2011 GCDP)

Prepare Local Area Plans for Ardaun and Murroogh which provide an urban design framework to contribute to the development of sustainable and vibrant living environments.

### **Policy 7.4 Urban Design** (of GCDP 2011-2017)

Prepare local area plans for Ardaun, Murroogh and the selected Headford Road area which provide an urban design framework to contribute to the development of sustainable and vibrant living environments.

### **Policy 8.7 Urban Design** (of GCDP 2017-2023)

Prepare Local Area Plans for Ardaun, Murrough and the Headford Road Area (south of the Bodkin junction) which provide an urban design framework to contribute to the development of sustainable and vibrant living and working environments.

### **Policy 10.6 Murrough** (of Draft GCDP 2023-2029)

1. Develop the Murrough area in accordance with a Local Area Plan which will reserve a substantial bank of land for recreational purposes, allow for public access and allow for mixed-use development which will create a sustainable neighbourhood

and maximise the sustainable development of appropriate recreation facilities.

### 10.27 Specific Objectives (of Draft GCDP 2023-2029)

#### Headford Road Area

3. Prepare a Local Area Plan for the Headford Road area (south of the Bodkin junction).

#### Recommendations:

1. Galway City Council should commit to preparing statutory Local Area Plans for significant regeneration and opportunity sites where major development is anticipated in accordance with the Guidelines for Local Authorities, 2013. A relevant extract from the guidelines follows:

#### Local Area Plans - Guidelines for Planning Authorities, 2013

*“The decision as to whether to prepare a local area plan in a sub-threshold context or include specific objectives in a development plan is a matter for the planning authority. However, such a decision would normally take on board criteria such as the **degree to which major development is anticipated** such as to justify the preparation of a standalone local area plan, the resource implications and the need to focus resources in using the local area plan process **for areas where major alterations to the built environment are anticipated.***

*Some non-statutory studies or frameworks are prepared by local authorities to give guidance on specific development proposals working within the relevant development plan or local area plan parameters. As long as such documents work within defined policy and objective parameters of the relevant plan and do not set new policies or objectives outside the statutory process for defining such content, **their usage is both appropriate and complementary to the preparation of statutory local area plans.**” (emphasis has been added)*

2. There should be specific timelines set out in the GCDP 2023-2029 in relation to the preparation of LAPs.

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