

Submission to the Draft Galway City Development Plan 2023-2029

Lands at Bothar na
dTreabh, Galway





DOCUMENT DETAILS

Client: **City Gateway Ltd**

Project Title: **Lands at Bothar na dTreabh, Galway**

Project Number: **210221-a**

Document Title: **Submission to the Draft Galway City Development Plan 2023-2029**

Document File Name: **2022.04.12 - DP Submission - F - 210221-a**

Prepared By: **MKO
Tuam Road
Galway
Ireland
H91 VW84**



Rev	Status	Date	Author(s)	Approved By
01	Draft	08/04/2022	OMcC	CR
F	Final	12/04/2022	OMcC	CR

Table of Contents

1.	EXECUTIVE SUMMARY	2
2.	INTRODUCTION.....	3
2.1	Site Location.....	3
2.2	Site Description.....	3
2.3	Planning History	8
3.	SUBMISSION REQUESTS	9
3.1	Assessment.....	10
3.1.1	Need.....	10
3.1.2	Policy Context	11
3.1.2.1	Density	11
3.1.3	Capacity of Water, Drainage and Roads Infrastructure.....	11
3.1.4	Supporting Infrastructure and Facilities	12
3.1.5	Physical Suitability.....	12
3.1.6	Sequential Approach.....	13
3.1.7	Natural Heritage	13
4.	CONCLUSION	15

TABLE OF TABLES

<i>Table 1: Draft Plan Table 1.2 Implementation Roadmap Population Projections for *Galway City & Suburbs.....</i>	<i>10</i>
<i>Table 2: Draft Plan Table 1.4 Total Annual Housing Need, 2023-2028.....</i>	<i>10</i>

TABLE OF FIGURES

<i>Figure 1: Indicative Site Location in relation to Galway City (Source: Google Maps, Edited by MKO).....</i>	<i>3</i>
<i>Figure 2: Extent of the Clients Landholding (Source: Bing Maps, Edited by MKO).....</i>	<i>4</i>
<i>Figure 3: Area of the Site Subject to this Zoning Submission (Source: Bing Maps, Edited by MKO).....</i>	<i>4</i>
<i>Figure 4: Wooden Fence on the sites Eastern Boundary (Source: Google Street View).....</i>	<i>5</i>
<i>Figure 5: Local Access Road to the north of the site (Source: Google Street View).....</i>	<i>6</i>
<i>Figure 6: Existing Pedestrian and Cycle Infrastructure along Doughiska Road (Source: Google Street View).....</i>	<i>6</i>
<i>Figure 7: General Arrangement of Martin Junction with the client's landholding highlighted in red (Source: Galway City Council, Edited by MKO).....</i>	<i>7</i>
<i>Figure 8: Vision for the Dublin Road, located to the south of the site (Source: Galway City Council).....</i>	<i>7</i>
<i>Figure 9: Draft Zoning of the Subject Site as per the Draft Plan (Edited by MKO).....</i>	<i>9</i>
<i>Figure 10: Supporting Facilities in the area Surrounding the Site (Source: Bing Maps, Edited by MKO)</i>	<i>12</i>
<i>Figure 11: Designated Sites in the area surrounding the site (Source: Myplan.ie, Edited by MKO).....</i>	<i>14</i>

APPENDICES

Appendix 1 – Planning Policy Context

1.

EXECUTIVE SUMMARY

We note that Galway City Council are in the review process of the existing Galway City Development Plan 2017-2023 and preparation of a new development plan for the period 2023-2029 is underway. On behalf of our client, City Gateway Ltd, we wish to make a submission regarding Stage 2 (Draft) of the Galway City Development Plan 2023-2029 (hereinafter referred to as the Draft Plan) which was published on the 28th of January 2022 and will be on public display until the 13th of April 2022.

The request of this submission is for a change of zoning from 'Low Density Residential' to 'Residential' on a site located at Bothar na dTreabh, Galway.

It is our understanding that the subject site should be rezoned to 'Residential' based on the following:

- The subject site is located in a strategic location within the Outer Suburb of Doughiska. The areas to the north and south of the site are characterised by existing residential development.
- There is currently conflicting planning policy at the local level compared to national planning policy context in relation to the subject site. It is clear that the rezoning of the subject site to 'Residential' will achieve consistency across local and national planning policy with regard to density at the subject site.
- The subject site extends to an area of approximately 1.3 hectares and has the capacity to assist Galway City Council in meeting the housing requirements for Galway as outlined in the core strategy of the Draft Plan.
- The subject site is very well served by existing infrastructure in the surrounding area including road connectivity, pedestrian and cycle infrastructure, and public transport.
- There are a wide range of facilities serving the site including healthcare, education, recreation, retail, and transport.
- There are no apparent planning constraints associated with the subject site; there are no ecological designations directly on the site, no cultural or archaeological sites, no flood zones or recorded flood events, and no concerns with access.
- The ongoing upgrade to the Martin Junction is set to transform the area surrounding the site and will provide a safer pedestrian and cycle network in the area.

An assessment of the subject site with regard to the Development Plans: Guidelines for Planning Authorities 2007 published by the Department of Housing, Local Government and Heritage outlines that the subject site is suitable for residential development during the lifetime of the forthcoming plan from 2023-2029.

2. INTRODUCTION

2.1 Site Location

The subject site is located at Bothar na dTreabh in Doughiska, Co. Galway. The Garrán Ard residential development is located approximately 70 metres north west of the subject site. The location of the subject site in terms of the wider City is illustrated in **Figure 1** below.

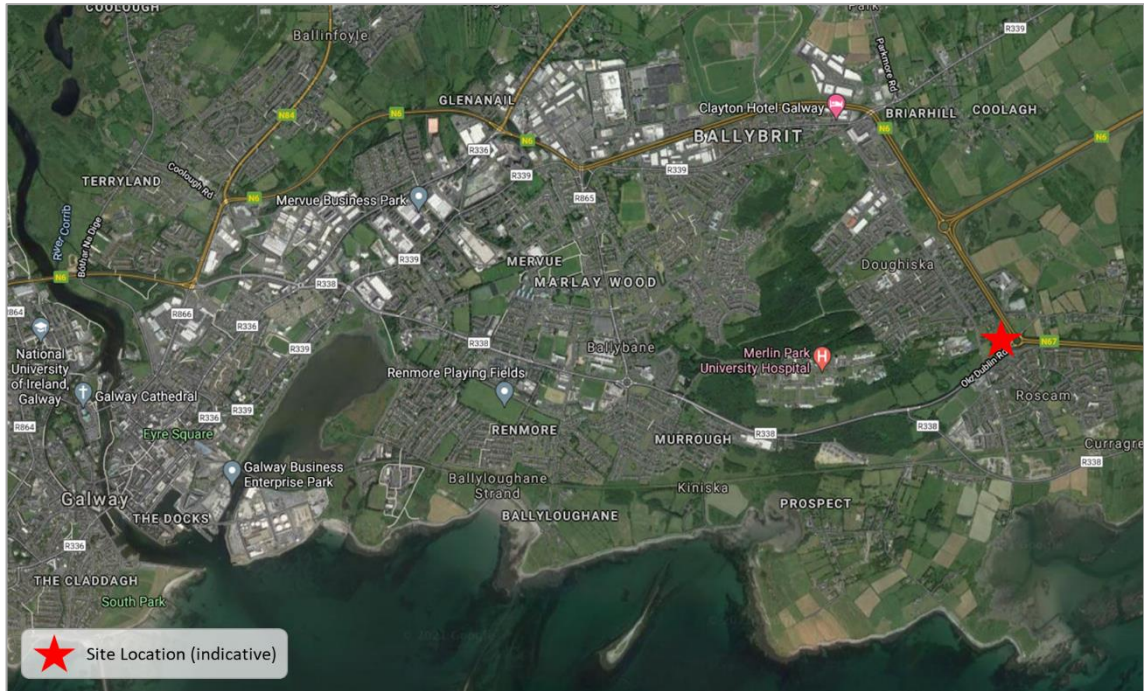


Figure 1: Indicative Site Location in relation to Galway City (Source: Google Maps, Edited by MKO)

2.2 Site Description

The full extent of our client’s landholding is illustrated in **Figure 2**. The northern section of this site is zoned for ‘Residential’ use in the Draft Plan, which this submission is in full support of. The section of the landholding which is the subject of this submission is illustrated in **Figure 3**. It is envisioned that the entirety of this landholding will be zoned for ‘Residential’ use in the forthcoming *Galway City Development Plan 2023-2029*.



Figure 2: Extent of the Clients Landholding (Source: Bing Maps, Edited by MKO)



Figure 3: Area of the Site Subject to this Zoning Submission (Source: Bing Maps, Edited by MKO)

The subject site extends to approximately 1.3 hectares in area. The site context is illustrated in **Figure 2**. There are a number of small-scale industrial services located to the west of the site. Residential developments are located north and south of the subject site, including Garrán Ard to the north and Durabhán to the south. Galway Clinic is located approximately 130 metres north east of the site.

There are very few constraints associated with the subject site. There are no National or designated European sites located on or adjacent to the subject site. Based on information detailed on floodinfo.ie there is currently no flood risk on the subject site. The site is not subject to any views or prospects. There are no recorded National Inventory of Architectural Heritage (NIAH) sites located on the subject site. The primary constraint associated with the subject site at present is the zoning objective for Low Density Residential use.

The site is well served in terms of access and connectivity. Merlin Lane, located north of the site and connected to Doughiska Road is a public road, currently serving a number of houses north of the site. A signalised junction is located along Doughiska Road approximately 110 metres south of the main entrance point. Part of the southern boundary of the site is bounded by a stone wall, and the eastern boundary is bounded by a wooden fence (**Figures 4**). Merlin Lane extends to the site's northern boundary, as shown in **Figure 5**. A wooden fence is currently located between this road and the subject site. The speed limit along Doughiska Road is 50km/h.



Figure 4: Wooden Fence on the sites Eastern Boundary (Source: Google Street View)



Figure 5: Local Access Road to the north of the site (Source: Google Street View)

The site is very well connected to Galway City Centre, which is a 6.5km drive via Bothar na dTreabh, and 6km via Old Dublin Road. The site is also connected to the Dublin M6 motorway via N67 Bothar na dTreabh. The site benefits from pedestrian and cycle infrastructure on both sides of the road along Doughiska Road along the site's western boundary (see **Figure 6**). Castlegar GAA Club bus stops (no. 524321 and 524181) are located approximately 80m south west of the site and connect the site to Eyre Square and Parkmore via the 409 bus route, and to Westside and Oranmore via the 404 bus route.

- **Bus Route 404:** Newcastle – Eyre Square – Oranmore
 - Frequency: Every 60 mins 6am - 11pm Mon-Sat, and 8am - 11pm Sunday
- **Bus Route 409:** Eyre Square – GMIT – Parkmore
 - Frequency: Approximately every 15 mins 6am-11pm Mon-Sat and 7:45am – 12am Sunday



Figure 6: Existing Pedestrian and Cycle Infrastructure along Doughiska Road (Source: Google Street View)

Construction has recently begun on the Martin Junction upgrade located to the southeast of the subject site. This upgrade will significantly improve the road infrastructure adjacent to the site. The upgrade will convert the existing Martin roundabout to a 4-arm signal-controlled junction, with the provision of cycle lanes, bus priority measures, footpaths and associated landscaping. The general arrangement of the junction upgrade is indicated in **Figure 7**.

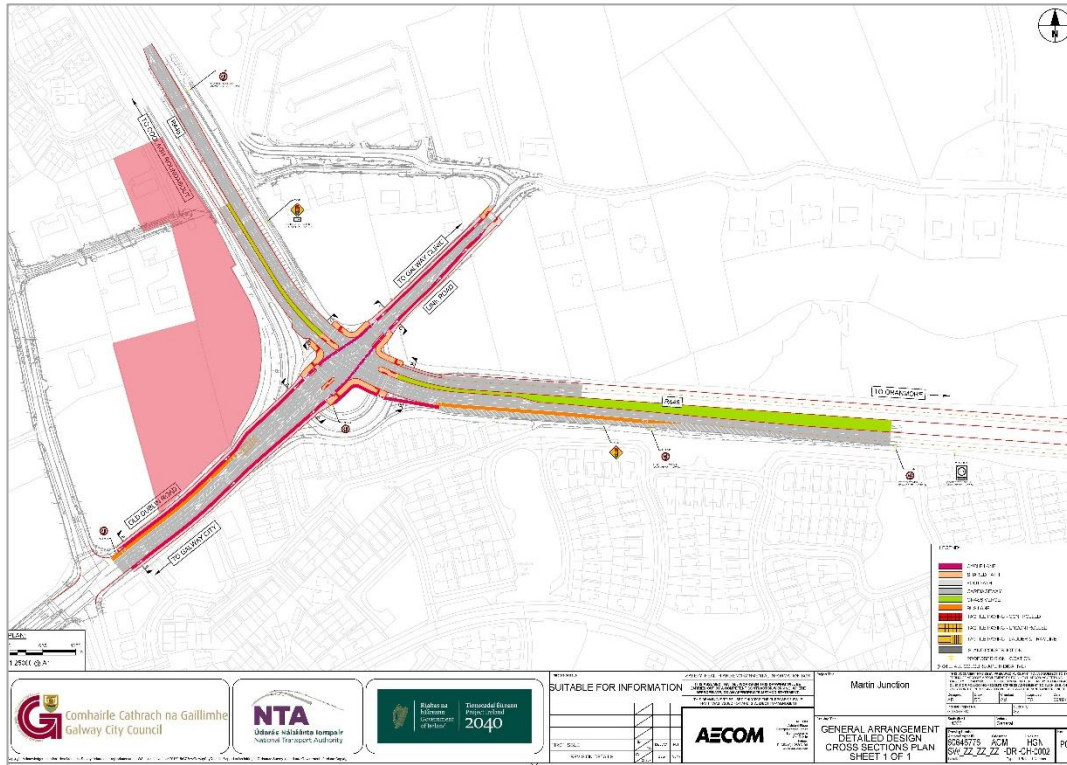


Figure 7: General Arrangement of Martin Junction with the client's landholding highlighted in red (Source: Galway City Council, Edited by MKO)



Figure 8: Vision for the Dublin Road, located to the south of the site (Source: Galway City Council)

2.3

Planning History

PI Ref: 98/64

Applicant: Flannery's Motor Inns Ltd.,

Development Description: Permission for the retention of a directional sign at the roundabout

Decision: GCC: Refused

ABP: Refused

3.

SUBMISSION REQUESTS

The purpose of this submission is to present a case to Galway City Council for the rezoning of the subject site from “Low Density Residential” to ‘Residential’ within the forthcoming Galway City Development Plan 2023-2029. The subject site is zoned for low density residential use in the extant Galway City Development Plan 2017-2023, and has also been zoned for low density residential use in the Draft Plan.

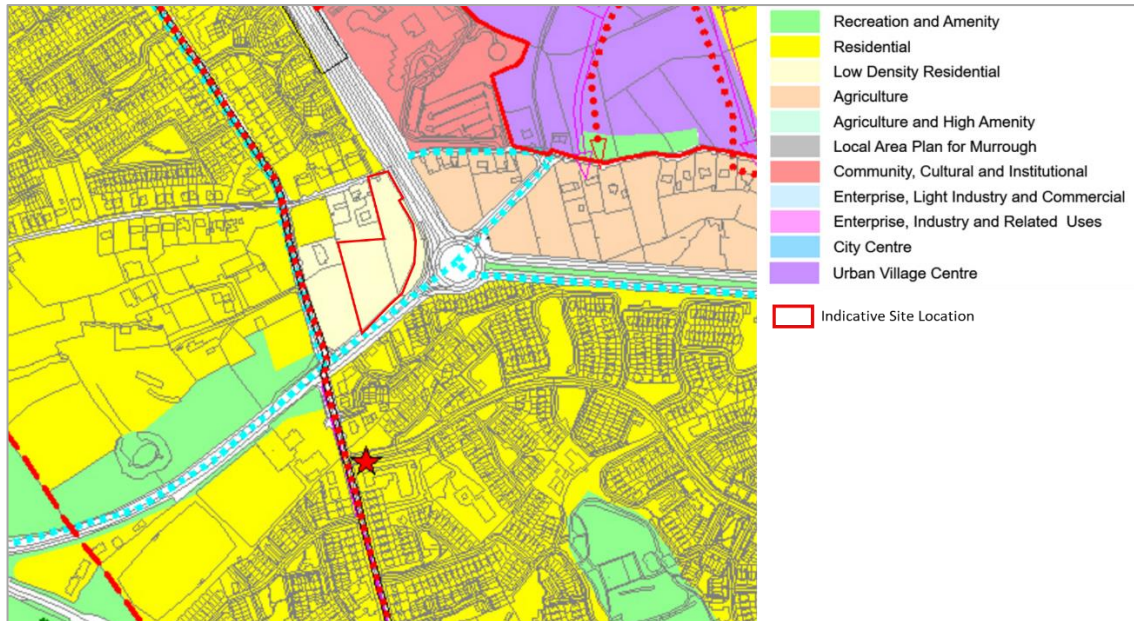


Figure 9: Draft Zoning of the Subject Site as per the Draft Plan (Edited by MKO)

It is our understanding that the subject site should be rezoned to ‘Residential’ based on the following:

- The subject site is located in a strategic location within the Outer Suburb of Doughiska. The areas to the north and south of the site are characterised by existing residential development.
- There is currently conflicting planning policy at the local level compared to national planning policy context in relation to the subject site. It is clear that the rezoning of the subject site to ‘Residential’ will achieve consistency across local and national planning policy with regard to density at the subject site.
- The subject site extends to an area of approximately 1.3 hectares and has the capacity to assist Galway City Council in meeting the housing requirements for Galway as outlined in the core strategy of the Draft Plan.
- The subject site is very well served by existing infrastructure in the surrounding area including road connectivity, pedestrian and cycle infrastructure, and public transport.
- There are a wide range of facilities serving the site including healthcare, education, recreation, retail, and transport.
- There are no apparent planning constraints associated with the subject site; there are no ecological designations directly on the site, no cultural or archaeological sites, no flood zones or recorded flood events, and no concerns with access.
- The ongoing upgrade to the Martin Junction is set to transform the area surrounding the site and will provide a safer pedestrian and cycle network in the area.

Residential development would be meeting both National and Regional policy objectives and population growth targets as outlined in **Appendix 1**. It is the request of this submission that Galway

City Council recognise the potential of these lands and the opportunity for growth in Galway that can be provided.

3.1 Assessment

The purpose of this section is to provide an assessment of the subject site against the criteria utilised by Planning Authorities in the identification of appropriate land for new residential development and as set out in Section 4 of the Development Plans: Guidelines for Planning Authorities 2007 published by the Department of Housing, Local Government and Heritage. The key criteria from this document will be set out below and an assessment of the proposed development provided against same. These criteria are as follows:

- > Need
- > Policy Context
- > Capacity of Water, Drainage and Roads Infrastructure
- > Supporting Infrastructure & Facilities
- > Physical Suitability
- > Sequential Approach
- > Environmental and Heritage Policy

This assessment also notes the criteria set out in section 6.2 of the Draft Development Plan Guidelines for Planning Authorities 2021 published by the Department of Housing, Local Government and Heritage.

3.1.1 Need

Section 4.13 of the Development Plans: Guidelines for Planning Authorities 2007 published by the Department of Housing, Local Government and Heritage states in relation to need that *“The amount of land to be zoned for any particular land-use must be clearly based on, and justified by, a realistic assessment of need. The survey and analysis stage of plan preparation should provide the baseline data to determine future land requirements. A number of factors need to be taken into consideration when determining the location and quantity of land to be zoned”*.

Table 1: Draft Plan Table 1.2 Implementation Roadmap Population Projections for *Galway City & Suburbs

Year	2016 (Census)	2026 (Projection)	2031 (Projection)
Population	79,900	102,900 (+ 23,000)	114,900 (+12,000)

Table 2: Draft Plan Table 1.4 Total Annual Housing Need, 2023-2028

	2023	2024	2025	2026	2027	2028	Total
Total Housing Need	776	743	702	713	711	790	4,433
Convergence Projections	744	711	670	681	679	758	4,245
Existing Need	31	31	31	31	31	31	186

As outlined in the core strategy of the Draft Plan, it is projected that Galway will grow by 23,000 people from 2016 to 2026, and by 12,000 people from 2026 to 2031. It is identified that the total housing need over the lifetime of the forthcoming plan will be 4,433. It is considered that there is an obvious and identifiable need for lands to be zoned for residential development at appropriate locations such as the subject site.

3.1.2 Policy Context

The Guidelines state the following in respect of Policy Context:

“Both the amount of land to be zoned for development and the proposed location of that land will also need to be influenced by other plans and strategies, from national and regional to local levels so that local authorities play their full part in supporting the implementation of those national and regional strategies.”

A detailed analysis of the relevant national, regional and local policy framework is provided in **Appendix 1** of this report, and outlines that residential development would be meeting the relevant policy objectives.

3.1.2.1 Density

As highlighted in Appendix 1, there is currently conflicting planning policy at the local level compared to national planning policy context in relation to the subject site. These policies and the local and national level are as follows:

- Local Level:
 - The subject site is zoned ‘Low Density Residential LDR’, in the Draft Plan and as a result is restricted a maximum density of 5 houses to the hectare.
- National Level:
 - The subject site is categorised as a ‘Peripheral and/or Less Accessible Urban Location’ in the *Sustainable Urban Housing: Design Standards or New Apartments Guidelines for Planning Authorities, 2018*. Such locations are generally suitable for limited, very small-scale (will vary subject to location), higher density development that may wholly comprise apartments, or residential development of any scale that will include a minority of apartments at low-medium densities (will also vary, but broadly <45 dwellings per hectare net).
 - The subject site is categorised as an ‘Outer Suburban / ‘Greenfield’ site in the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)*. These sites may be defined as open lands on the periphery of cities or larger towns whose development will require the provision of new infrastructure, roads, sewers and ancillary social and commercial facilities, schools, shops, employment and community facilities. Studies have indicated that whilst the land take of the ancillary facilities remains relatively constant, the greatest efficiency in land usage on such lands will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare and such densities (involving a variety of housing types where possible) should be encouraged generally. Development at net densities less than 30 dwellings per hectare should generally be discouraged in the interests of land efficiency, particularly on sites in excess of 0.5 hectares.

It is considered that a change in zoning to ‘Residential’ will provide consistency across local and national policy, and that this proposed change in zoning is compliant with the existing national policies with regard to density.

3.1.3 Capacity of Water, Drainage and Roads Infrastructure

The Guidelines state the following in respect of Supporting Infrastructure & Facilities:

“When making decisions to zone land, regard must be had to the existing and future availability of, or the capacity to provide, infrastructure. Where services are not available there should be a reasonable expectation of their being provided in the plan period. Land should not be zoned if there is no reliable

prospect of providing key physical infrastructure, within the plan period or a reasonable time period thereafter, such as improved roads, footpaths, drainage and lighting to serve likely future development.”

As outlined in section 2 of this report, the site is very well served by existing facilities. The site is well served in terms of access and connectivity. Merlin Lane, located north of the site and connected to Doughiska Road is a public road, currently serving a number of houses north of the site. A signalised junction is located along Doughiska Road approximately 110 metres south of the main entrance point. The Martin Junction upgrade is currently underway which will provide key road, cycling, and pedestrian infrastructure to the southeast of the site.

There is currently public lighting located along both Bothar na dTreabh and the Old Dublin Road, as well as along Doughiska Road to the west of the site.

Any future residential development on the site will be subject to an Irish Water connection enquiry.

3.1.4 Supporting Infrastructure and Facilities

The Guidelines state the following in respect of Supporting Infrastructure & Facilities:

“Consideration must be given to the future availability of, or the capacity to provide, supporting infrastructure, such as community facilities, health-care, schools, public open space, retail and other service provision and public transport when allocating land for development.”

The subject site is very well served by a wide range of services and facilities in the surrounding area, as illustrated in **Figure 10**. These facilities include healthcare, retail, recreation, education, transport, and community facilities.

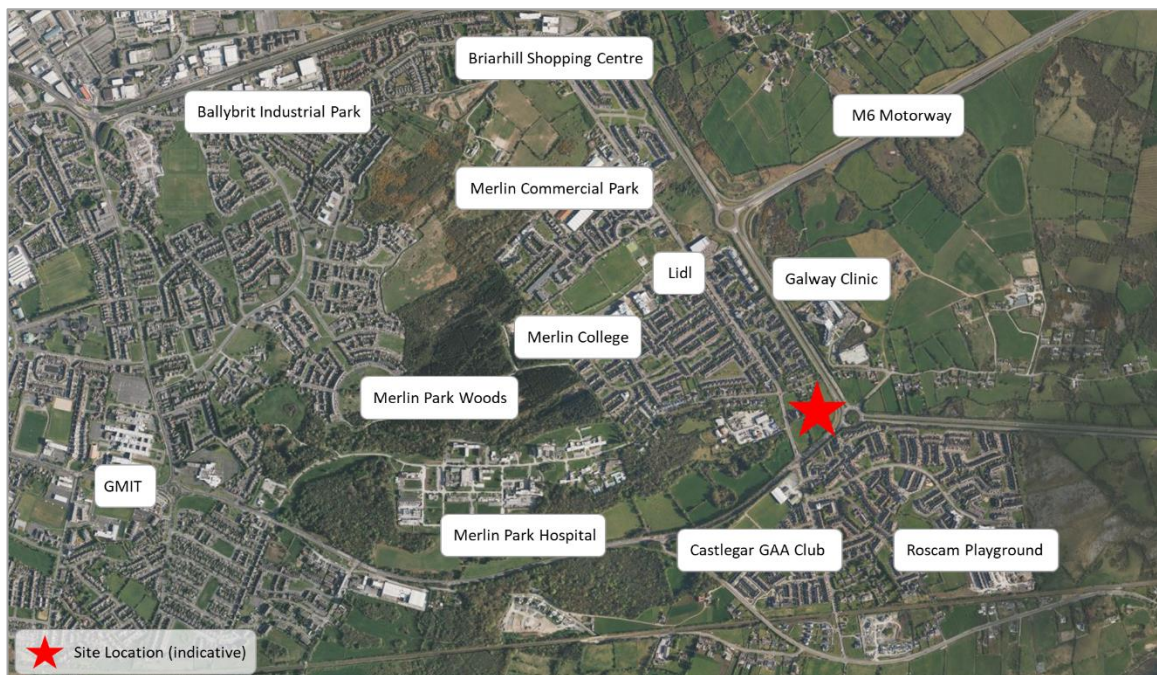


Figure 10: Supporting Facilities in the area Surrounding the Site (Source: Bing Maps, Edited by MKO)

3.1.5 Physical Suitability

The Guidelines state the following in respect of Physical Suitability:

“The development plan should strive to ensure that the form and location of new development offers the best “value for money” in terms of efficient use of existing infrastructure, while minimising the need

for costly new infrastructure. Where land in green-field locations is to be zoned, account should be taken, in considering the different options available, of the land's capacity for development by way of the most cost-effective means of providing the necessary infrastructure."

As outlined in section 2 of this report, the site is very well served by existing infrastructure in the area.

There are no apparent planning constraints associated with the subject site; there are no ecological designations directly on the site, no cultural or archaeological sites, no flood zones or recorded flood events, and no concerns with access.

3.1.6 Sequential Approach

The Development Plans: Guidelines for Planning Authorities 2007 state the following in respect of the Sequential Approach:

"In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach should be taken to the zoning of land for development:

(i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided);

(ii) A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands;

(iii) Areas to be zoned should be contiguous to existing zoned development lands."

The site is located in a strategic location within the neighbourhood of Doughiska. The site is located within an 'Outer Suburb' in the Draft Plan. The areas to the north and south of the site are characterised by existing residential development. The area surrounding the site is set to undergo significant improvements in terms of pedestrian infrastructure and connectivity with the upgrade to the Martin Junction which is currently underway. For these reasons, it is considered that the site presents itself as an ideal location for residential development in excess of 5 units per hectare.

3.1.7 Natural Heritage

The Guidelines state the following in respect of Natural Heritage:

"Local authorities have a key role to play in regard to preserving the natural heritage of their areas arising from the legal responsibilities placed on them and from the increasing public awareness of the importance of nature conservation at local level. In doing so they should also avail of opportunities that may arise to create or promote new features of biodiversity in the context of new developments."

There are no National or designated European sites located on or adjacent to the subject site.

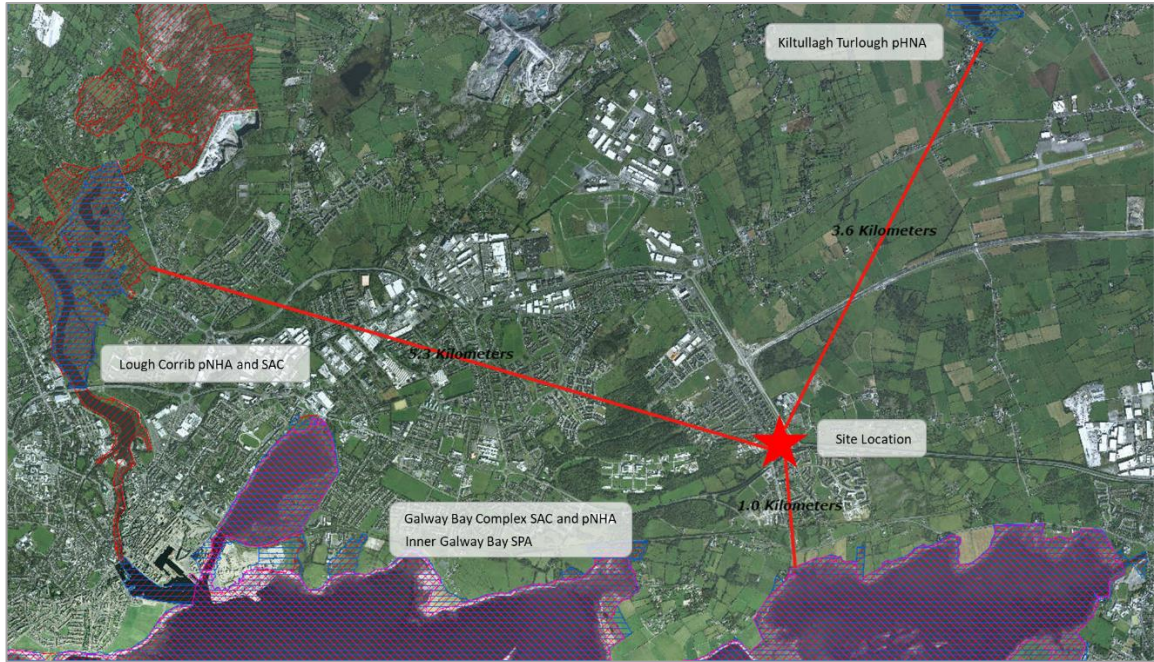


Figure 11: Designated Sites in the area surrounding the site (Source: Myplan.ie, Edited by MKO)

4.

CONCLUSION

This submission has been prepared regarding the Draft Galway City Development Plan 2023-2029.

The request of this submission is for a change of zoning from 'Low Density Residential' to 'Residential' on a site located at Bothar na dTreabh, Galway.

Based on the assessment as outlined in this report, it is evident that the rezoning of this site as 'Residential' is consistent with the guidance as outlined in the Development Plans: Guidelines for Planning Authorities 2007 published by the Department of Housing, Local Government and Heritage.

We respectfully request that the planning Authority give due consideration to these matters in the preparation of the forthcoming plan.



APPENDIX 1

PLANNING POLICY CONTEXT

Project Ireland 2040 National Planning Framework

Project Ireland 2040 was formally launched on 16th February 2018. The NPF supports ambitious growth targets to enable population growth within the Galway Metropolitan Area, which includes Doughiska and states that *‘Galway needs to accommodate a greater proportion of the growth it generates within its metropolitan boundaries.’*

The NPF sets out 10 no. National Strategic Outcomes and Priorities of the National Development Plan. National Strategic Outcome 1 related to ‘Compact Growth’, and states:

“Carefully managing the sustainable growth of compact cities, towns and villages will add value and create more attractive places in which people can live and work. All our urban settlements contain many potential development areas, centrally located and frequently publicly owned, that are suitable and capable of re-use to provide housing, jobs, amenities and services, but which need a streamlined and co-ordinated approach to their development, with investment in enabling infrastructure and supporting amenities, to realise their potential. Activating these strategic areas and achieving effective density and consolidation, rather than more sprawl of urban development, is a top priority.”

The NPF outlines that Galway City and Suburbs has a projected growth population of 40,000-45,000 people before 2040.

Regional Spatial and Economic Strategy for the Northern and Western Region 2020-2032

The RSES for the Northern & Western Regional Assembly was formally adopted on 24th January 2020.

Section 1.6 of the Strategy assesses ‘spatial impact’ and indicates clear support for the continued growth of Galway as one of the five cities, each of which are expected to grow “by at least 50% to 2040” and to become “cities of scale.” The RSES outlines arrangements for a co-ordinated metropolitan area strategic plan (MASP) for the Galway Metropolitan Area. The MASP is an opportunity for Galway to address recent growth legacy issues and build on key strengths, including a vibrant arts and cultural scene, year-round tourism and an attractive natural setting. The RSES notes that for half a century, Galway has been Ireland’s most rapidly developing area and is a *‘key driver for the West of Ireland’*. The Galway Metropolitan area shares many of the challenges arising from growth and economic success with much larger cities. As such, Galway needs to *“accommodate a greater proportion of the growth it generates within its metropolitan boundaries”* and in this regard, the associated challenges associated include both housing choice and housing affordability.

The RSES sets out a vision for the Galway MASP:

“The Vision of this MASP is that Galway will be a leading a leading European city renowned for its quality of life, its history, its culture and its people. It is and will be a place that embraces modern technologies, high standards of education, competitive and sustainable enterprises.”

The RSES notes that the Galway Metropolitan area has considerable land capacity that can significantly contribute to meeting the housing demands based on population targets set out within. Under section 3.6(a) the following targets are listed for population and city homes:

- The 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.
- **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

It is estimated that by 2040 the population of the Galway MASP will be 145,816 people which is an increase of 51,741 people. Based on an average household size of 2.7 people, this results in a requirement for nearly 20,000 new homes.

The subject site, as indicated in **Figure 1** below is located adjacent to the Roscam 'Residential Opportunity Site'.

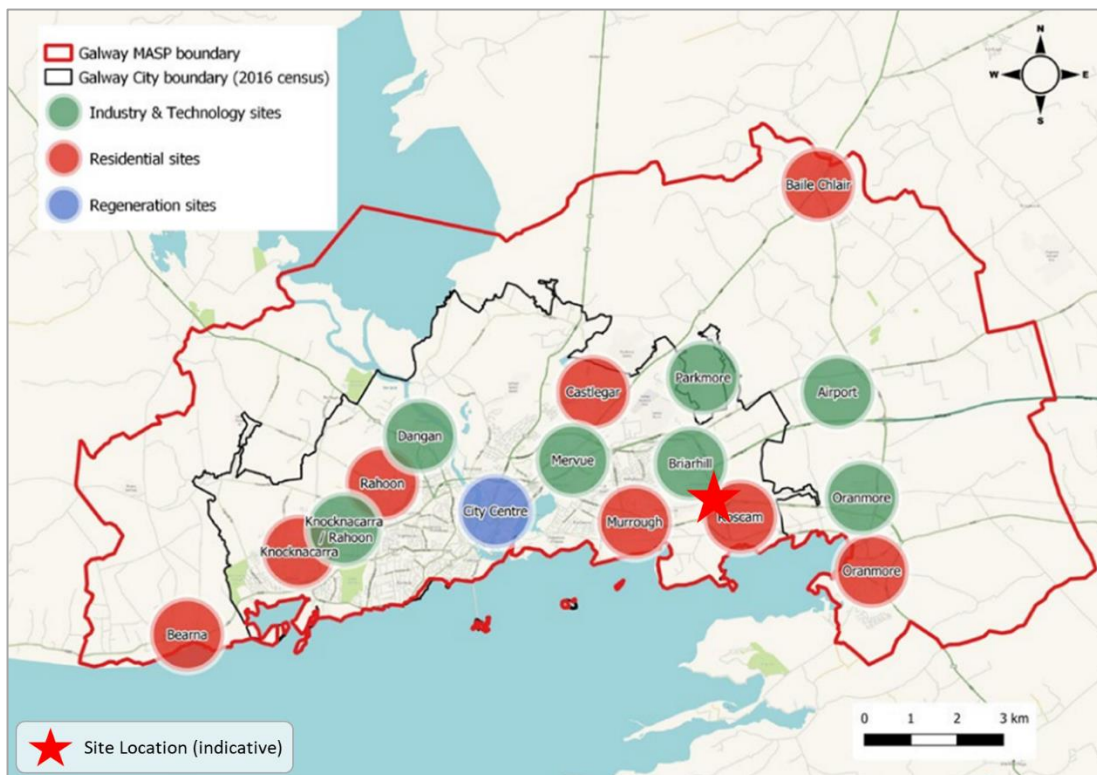


Figure 1: The sites location within the Galway MASP Strategic Locations (Edited by MKO)

Galway City Development Plan 2017-2023

The subject site is governed by the policies and provisions contained in the Galway City Development Plan 2017-2023 (as varied) (CDP). The CDP was adopted by the City Council in December 2016 and came into effect on the 7th January 2017. The CDP includes a Core Strategy and Settlement Strategy which notes the need to adequately accommodate the continued population growth of the city in a sustainable manner. The Core Strategy outlines that the population target for Galway City as set out in the Region Planning Guidelines for the Western Region is for the city to reach a population target of 98,700 by 2022. Taking account of the 467 housing units completed up to September 2016, there would be an estimated residual demand for 8,043 housing units to meet the needs for housing of the population target. In this regard, the adopted Settlement

Strategy is primarily based on consolidating the urban form of the City. The strategic goals of the CDP include the following:

- Promote balanced and sustainable economic development that will enable Galway City to fulfil its role as a National Gateway and a Regional Centre, providing sufficient employment opportunities and appropriate services;
- Use the role of the Gateway to harness the strengths and maximise the economic development of the region; and
- Provide for a built and natural environment that is of high quality and that contributes to providing a good quality of life for residents and visitors and affords sustainable transportation opportunities.

The CDP sets out a co-ordinated and integrated spatial framework for the continued development of the city in a sustainable and inclusive manner. It is set within the overall national and regional planning contexts, taking into account relevant national guidelines published by the Department of Housing, Planning, Community and Local Government. The overall aim for housing and the development of sustainable neighbourhoods is the provision for 'good quality housing for all sectors of the community in sustainable neighbourhoods that are attractive places to live and are within easy access to a range of local services, amenities, community facilities and public transport networks'. Policy 2.2 (Housing Strategy) sets out a number of actions required to ensure that the housing needs of the existing and future population are met, including those considered relevant to the subject lands:

- Support a diverse range of housing types, size and tenures within housing developments in the interests of countering undue segregation and to allow for choice of community, for all persons irrespective of age, culture, social background or ability;
- Encourage the provision of good quality, well regulated, private rented accommodation in order to provide a real choice, stable and attractive housing option to meet the general demands for both short and long term accommodation including for those on social housing support; and
- Support the development of sustainable communities and ensure that all new housing developments – private, public and voluntary are carried out in accordance with the DECLG guidelines Sustainable Residential Developments in Urban Areas (2008) and Section 28 Ministerial guidelines – Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, (2015).

The CDP notes that an essential element of urban sustainability is the development of a compact city; specifically, the consolidation of existing neighbourhoods and the establishment of new neighbourhoods. The CDP establishes a 'Neighbourhood Concept' with regard to managing residential development; specifically, this concept (Policy 2.4) has been implemented by the CDP to ensure that city neighbourhoods are developed and maintained in a sustainable manner:

- Encourage the development of sustainable residential neighbourhoods, which will provide for high quality, safe, accessible living environments which accommodates local community needs;
- Encourage sustainable neighbourhoods, through appropriate guidelines and standards and through the implementation of local area plans, masterplans / frameworks / area plans;
- Protect and enhance new/existing residential neighbourhoods through appropriate guidelines and standards, preparation of framework plans, development briefs and design statements; and
- Ensure the design of residential developments have regard to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) and the accompanying Urban Design Manual–A Best Practice Guide and the Design Manual for Urban Roads and Streets (2013).

The CDP sets out the framework for residential neighbourhoods in the city and divides the neighbourhoods into indicative areas as follows: Outer Suburbs; Established Suburbs; Inner Residential Areas and City Centre. The subject site has been classified by the CDP as an 'Outer Suburb' within their Neighbourhood Hierarchy, as illustrated in **Figure 2** below.

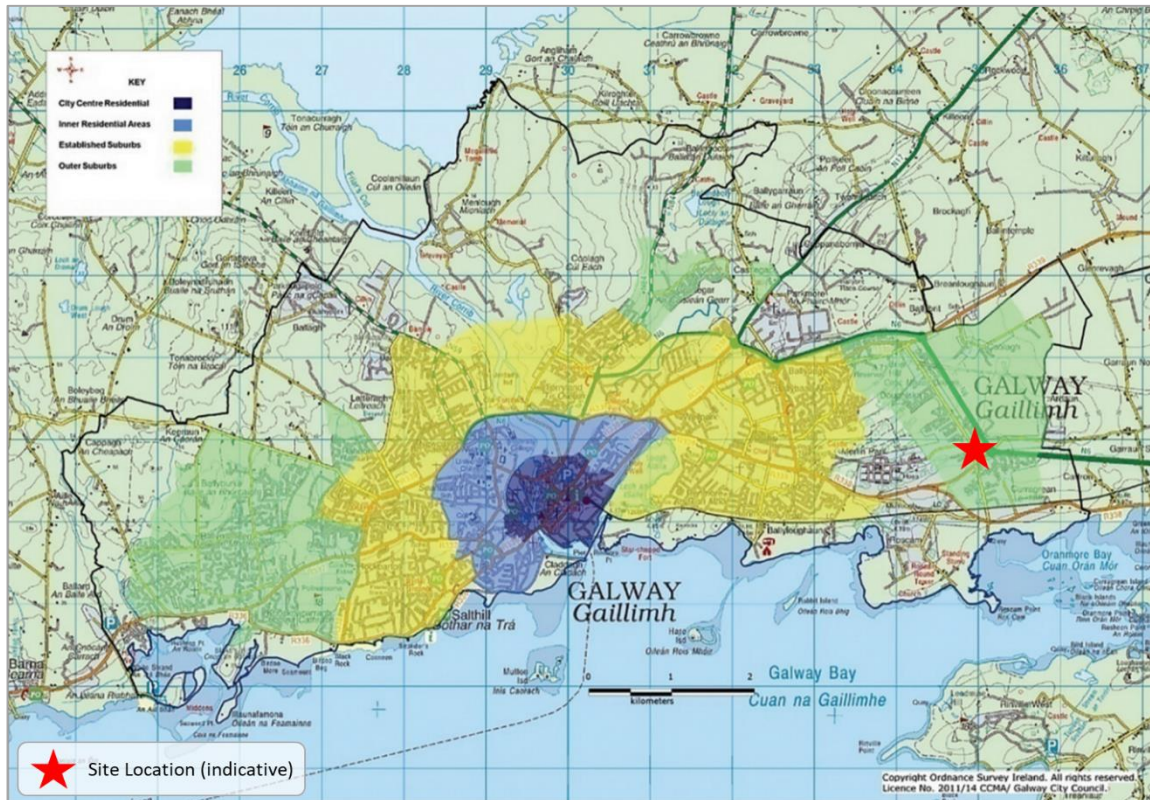


Figure 2: Neighbourhood Hierarchies (Source: Galway City Development Plan 2017-2023, Edited by MKO)

Policy 2.5 relates to the sustainable development of residential developments and the key requirements associated with higher residential densities.

Section 11.3.1 of the CDP sets out the design criteria required in the Outer Suburbs. This sets out the following:

- a) *General requirements of residential development in these areas*
- b) *Standards for roads and streets in new residential development, in line with the Design Manual for Urban Roads and Streets (DMURS)*
- c) *Amenity open space provision in residential developments*
- d) *Overlooking*
- e) *Daylight*
- f) *Distance between dwellings for new residential development*
- g) *Car parking standards*
- h) *Cycle parking standards*
- i) *Bin storage standards*
- j) *Conversion and subdivision of dwellings*
- k) *Self contained residential units*
- l) *Residential extensions*

Section 2.9 of the CDP relates to Low Density Residential Areas. Policy 2.9 states:

“Protect the character of these areas by ensuring new development has regard to the prevailing pattern, form and density of these areas. Protect the characteristics of these areas through development standards and guidelines.”

Land Use Zoning

Policies on density on the subject site are contradictory between national and local levels. The subject site is located in an ‘Outer Suburb’, and allows for higher density development as outlined in section 5.3.3 below. Under the *Galway City Development Plan 2017-2023* the current land-use zoning objective for the subject site is ‘Low Density Residential LDR’. The zoning of the site and the surrounding lands is illustrated in **Figure 3**, as per the Land Use Zoning and Specific Objectives Map in the CDP.

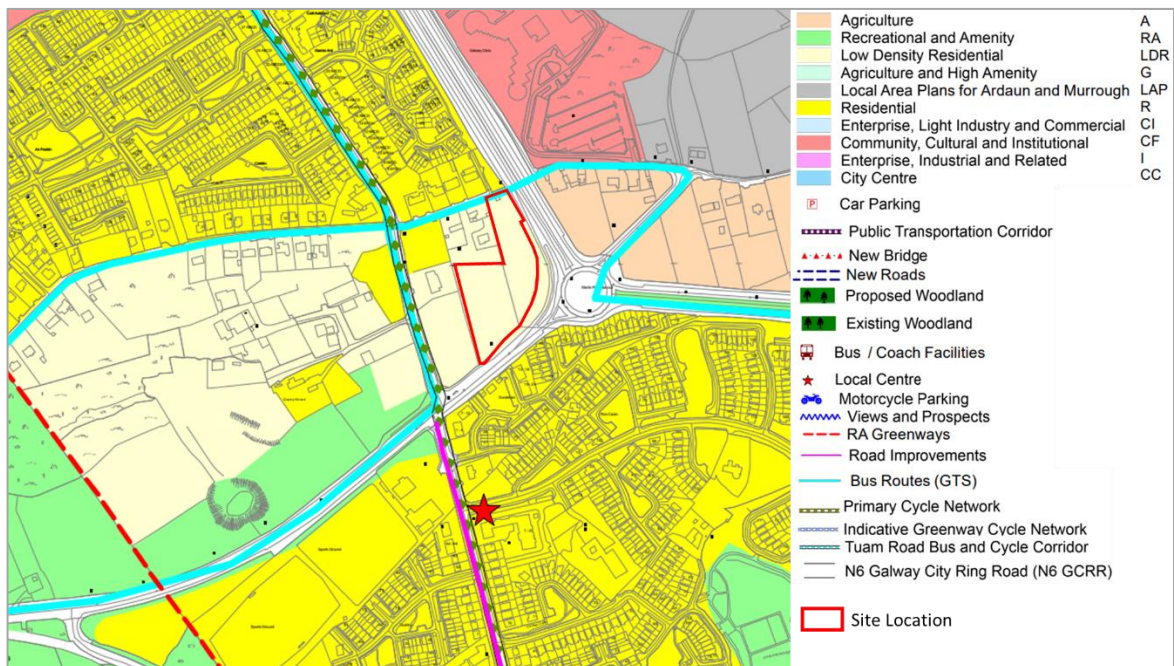


Figure 3: Land-use zoning objective of the subject site (Source: *Galway City Development Plan 2017-2023*, Edited by MKO)

The zoning objective for lands zoned LDR is as follows

“To provide for low-density residential development which will ensure the protection of existing residential amenity”.

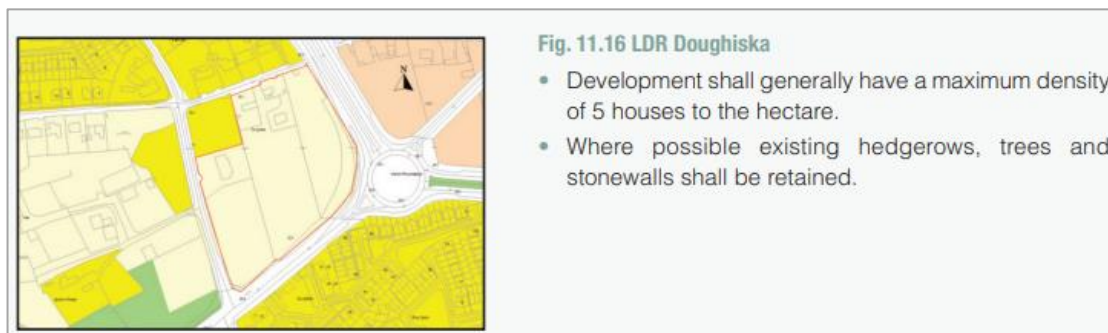
The CDP outlines uses which are compatible with and contribute to the zoning objective including:

- > Residential,
- > Residential institution,
- > Outdoor recreational use,
- > Accommodation for Travellers,
- > Local shops, local offices, licensed premises, banks and other local services,
- > Buildings for Education,
- > Childcare facilities,
- > Buildings for the care of the health, safety, or welfare of the public,
- > Buildings for community, cultural, or recreational use.

Uses which may contribute to the zoning objective dependent on the Low Density Residential location and the scale of the development include the following:

- > Hotel, Guesthouses, Hostels and B&Bs,
- > Part conversion or extension of private residence to studio, office, childcare facility or small enterprises by the occupier of the dwelling, at a scale as would not unduly interfere with the primary use of the dwelling,
- > Places of worship,
- > Public utilities.

Figure 11.16 of the CDP identifies the site as 'LDR Doughiska', and states "development shall generally have a maximum density of 5 houses to the hectare", and "where possible existing hedgerows, trees and stone walls shall be retained".



Core Strategy

Under the Core Strategy of the CDP, Doughiska is recognised as a District Centre.

The CDP refers to Doughiska as a key residential area of projected growth with a main population of the city stating that

"It is anticipated that other residential areas of the city will grow but at a more constrained rate and in character with the established nature of development. These areas include the newer suburbs of Knocknacarra, Castlegar and Doughiska. The policy here is to allow for consolidation and densification where appropriate".

Galway City and Suburbs has a projected growth population of 40,000-45,000 people before 2040, with 50% of new housing planned within existing Galway City and suburbs footprint, as outlined in the *Regional Spatial and Economic Strategy 2020-2032: Northern and Western Region (RSES)*. The Core Strategy of the Galway CDP was published before the RSES in 2020, of which further consideration will be given with the CDP Review of the current plan which began on the 7th January 2021, in preparation for the new City Development Plan for the period 2023-2039.

Density

There is conflicting planning policy at the local level compared to national planning policy context in relation to the subject lands. These policies and the local and national level are as follows:

- *Local Level:*
 - *The subject site is zoned 'Low Density Residential LDR', and as a result is restricted a maximum density of 5 houses to the hectare.*
- *National Level:*
 - *The subject site is categorised as a 'Peripheral and/or Less Accessible Urban Location' in the Sustainable Urban Housing: Design Standards or New Apartments Guidelines for*

Planning Authorities, 2018. Such locations are generally suitable for limited, very small-scale (will vary subject to location), higher density development that may wholly comprise apartments, or residential development of any scale that will include a minority of apartments at low-medium densities (will also vary, but broadly <45 dwellings per hectare net).

- *The subject site is categorised as an ‘Outer Suburban / ‘Greenfield’ site in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009). These sites may be defined as open lands on the periphery of cities or larger towns whose development will require the provision of new infrastructure, roads, sewers and ancillary social and commercial facilities, schools, shops, employment and community facilities. Studies have indicated that whilst the land take of the ancillary facilities remains relatively constant, the greatest efficiency in land usage on such lands will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare and such densities (involving a variety of housing types where possible) should be encouraged generally. Development at net densities less than 30 dwellings per hectare should generally be discouraged in the interests of land efficiency, particularly on sites in excess of 0.5 hectares.*

Draft Galway City Development Plan 2023-2029

The Draft Galway City Development Plan 2023-2029 was published on 28th January and is open for public consultation until 13th of April 2022.

The Draft Plan sets out a number of Strategic Goals. Relevant goals include the following:

- Develop a more urban compact form in the city that provides for attractive, integrated, and easily accessible neighbourhoods that are supported by appropriate levels of services and amenities.

Policy 1.2 National and Regional framework

1. *Ensure consistency with the National Planning Framework and the vision to achieve the shared goals as expressed in the National Strategic Outcomes (NSOs).*
2. *Ensure consistency with the Northern and Western Regional Spatial and Economic Strategy (RSES) including the MASP and support the achievement of the associated Regional Policy Objectives (RPOs).*

Policy 1.3 Metropolitan Area Strategic Plan (MASP)

1. *Recognise the importance of the Galway Metropolitan Area Strategic Plan (MASP) in the delivery of strategic growth with critical mass that supports the development of the city and existing surrounding settlements as strong, attractive urban places, supported by a level of services and infrastructure that creates successful, sustainable and socially inclusive communities and which harnesses the strengths associated with scale to maximise economic opportunities and supports investment.*
2. *Continue to liaise with Galway County Council in the context of the MASP and other relevant shared planning policy issues to support a consistent integrated approach to sustainable development and meeting population growth targets in the MASP area.*

Policy 3.1 Housing Strategy

- *Ensure that sufficient suitable lands are zoned to meet the extent of housing needs identified in accordance with the National Planning Framework 2040 (NPF), the Regional Spatial and Economic Strategy (RSES) and the Metropolitan Area Strategic Plan (MASP) targeted population for Galway City, supporting compact growth and regeneration including the requirement that at least 50% of all new homes be delivered within the existing built-up footprint.*
- *Support a diverse range of housing types, size and tenures within the City Council’s housing developments in the interests of achieving good integration and to allow for a choice of community for all persons.*
- *Support a diverse range of housing types, size and tenures and endeavour to meet the demand for Owner Occupier housing as projected in the Housing Strategy and the Housing Need and Demand Assessment (HNDA).*
- *Support the development of sustainable communities and ensure that all new housing developments – private, public and voluntary are carried out in accordance with the DECLG guidelines Sustainable Residential Developments in Urban Areas (2009) and where applicable to apartments, Section 28 Ministerial guidelines – Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, (2020).*



Figure 4: Galway City Neighbourhood Areas

Residential Densities:

“To support population increases and reflect national policy on compact growth and in order to render efficiencies from infrastructural investment, higher residential densities are required at appropriate locations, especially in conjunction with public transport facilities and active travel networks. Well designed and located high density housing can enhance the viability of services, reduce energy demand and add to the vitality and vibrancy of existing neighbourhoods and provides greater housing choice.

Guidance with regard to higher density residential development is set out in the SRD guidelines and the Sustainable Urban Housing: Design Standards for New Apartments Guidelines (2020). In addition the Galway UDBHS (2021) gives direction on the suitability of different neighbourhoods in the city to accommodate increased densities.”

Policy 3.3 Sustainable Neighbourhood Concept

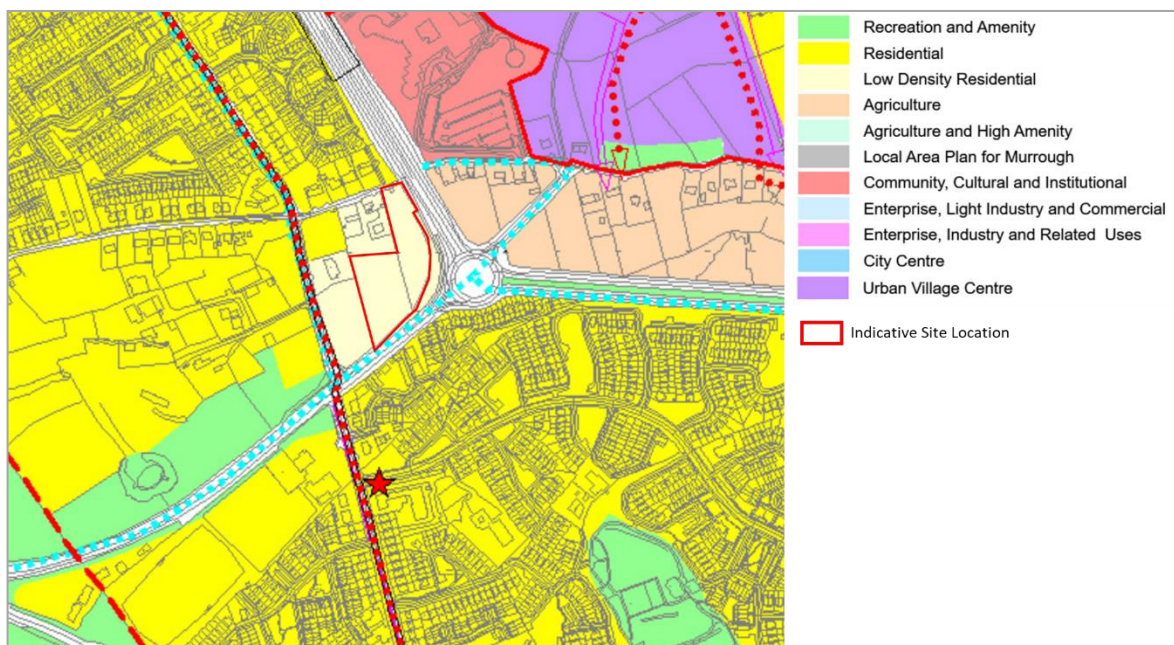
- *Promote the development of compact, well designed, safe and attractive neighbourhoods that deliver efficient use of land and have effective integration with social and physical infrastructure, including public transport, that will enable the development of successful communities and facilitate the growth strategy for Galway City as envisioned in the NPF and RSES.*
- *Encourage higher residential densities at appropriate locations as guided by the Galway Urban Density and Building Height Study (2021). Such locations include strategic Regeneration and Opportunity Sites, and residential and mixed use zoned sites located close to public transport routes and routes identified in the Galway Transport Strategy as suitable for high frequency, public transport services.*

Policy 3.4 Sustainable Neighbourhoods: Outer Suburbs

- *Facilitate consolidation of existing residential development and densification where appropriate within the outer suburbs to deliver on population targets while ensuring the reasonable protection of the residential amenities.*
- *Ensure that sustainable neighbourhoods are places where housing, streets, open spaces and local facilities come together in a coherent, integrated and attractive form with appropriate community infrastructure delivered in tandem with new growth.*

Land Use Zoning

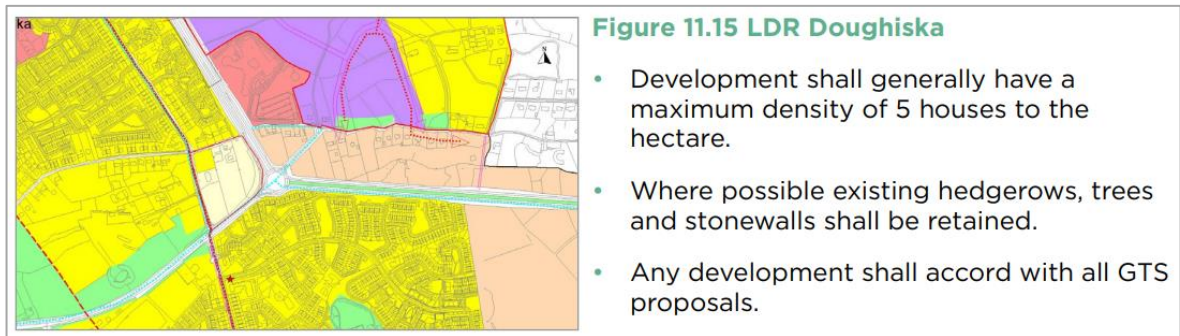
The site is zoned in the Draft Plan as 'Low Density Residential'. It is the request of this submission to rezone the site for 'Residential' use.



Zoning Objective R: *To provide for residential development and for associated support development, which will ensure the protection of existing residential amenity and will contribute to sustainable residential neighbourhoods.*

Zoning Objective R	To provide for residential development and for associated support development, which will ensure the protection of existing residential amenity and will contribute to sustainable residential neighbourhoods
Uses which are compatible with and contribute to the zoning objective, for example:	<ul style="list-style-type: none"> > Residential > Residential institution > Outdoor recreational use > Accommodation for Travellers > Local shops, local offices, licensed premises, banks and other local services > Buildings for education > Childcare facilities > Buildings for the care of the health, safety or welfare of the public > Buildings for community, cultural or recreational use
Uses which may contribute to the zoning objective, dependent on the R and LDR location and scale	<ul style="list-style-type: none"> > Hotel, Guesthouses and B&B's > Part conversion or extension of private residence to studio, office, childcare facility or small enterprises by the occupier of the dwelling, at a scale as would not unduly interfere with the primary use of the dwelling > Places of worship > Public utilities

Figure 11.15 of the Draft Plan identifies the site as 'LDR Doughiska', and states "development shall generally have a maximum density of 5 houses to the hectare", and "where possible existing hedgerows, trees and stonewalls shall be retained".



Core Strategy

"In the interests of delivering compact growth the zoning of additional lands for residential use has been constrained, existing residential areas of the city will grow but through consolidation and modest densification. These areas include the newer suburbs of Knocknacarra, Castlegar and Doughiska, where there are opportunities for additional local employment growth, services and facilitates and for improved public transport and active mode measures."

Policy 1.4 Core Strategy

- Ensure that sufficient amount of lands are zoned and enabled to meet the demands for a diverse range of uses including housing, employment, services and amenity needs over the lifetime of the plan.

- *Support the compact growth of Galway City through appropriate policies that promote co-ordination between land use and locations that can be served by public transport and the walking and cycling networks and enables the delivery of 50% of all new homes within the existing built footprint on lands as set out in the Core Strategy.*
- *Encourage new neighbourhoods and the consolidation of existing neighbourhoods to develop as sustainable, attractive, well- connected neighbourhoods at appropriate densities, with a high quality of design of buildings and spaces, supported by services, amenities and local enterprises.*

Density

There is conflicting planning policy between the Draft Plan compared to national planning policy context in relation to the subject lands. These policies and the local and national level are as follows:

- *Draft Plan:*
 - *The subject site is zoned 'Low Density Residential LDR', and as a result is restricted a maximum density of 5 houses to the hectare.*
- *National Level:*
 - *The subject site is categorised as a 'Peripheral and/or Less Accessible Urban Location' in the Sustainable Urban Housing: Design Standards or New Apartments Guidelines for Planning Authorities, 2018. Such locations are generally suitable for limited, very small-scale (will vary subject to location), higher density development that may wholly comprise apartments, or residential development of any scale that will include a minority of apartments at low-medium densities (will also vary, but broadly <45 dwellings per hectare net).*
 - *The subject site is categorised as an 'Outer Suburban / 'Greenfield' site in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009). These sites may be defined as open lands on the periphery of cities or larger towns whose development will require the provision of new infrastructure, roads, sewers and ancillary social and commercial facilities, schools, shops, employment and community facilities. Studies have indicated that whilst the land take of the ancillary facilities remains relatively constant, the greatest efficiency in land usage on such lands will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare and such densities (involving a variety of housing types where possible) should be encouraged generally. Development at net densities less than 30 dwellings per hectare should generally be discouraged in the interests of land efficiency, particularly on sites in excess of 0.5 hectares.*

