



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

7th September 2020

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

A Chara,

1.0 Introduction

I have been instructed by my client **Noel Ó Mainín of Tógáil Teo**, to prepare a submission in relation to the proposed review of the County Development Plan. In particular, this submission seeks the inclusion of an objective as follows;

- (1) Encourage the revitalisation of the village of Na Forbacha through the redevelopment of brownfield sites and improvements to the streetscape. These proposals will be considered where satisfactory upgraded effluent treatment systems are proposed.***

The proposed objective would foster positive urban design intervention and would be consistent with National, Regional and existing County Planning Policy. The Grounds of Submission are outlined below.

2.0 Consistency with National Planning Framework

The governments publication entitled “*Project Ireland 2040- National Planning Framework*” or (NPF), sits on top of the Planning Policy Hierarchy.

The requested encouragement of redevelopment of village brownfield sites is supported by the provisions of the NPF. This is discussed in Table 1 below.

Table 1 – Compliance with National Planning Framework (NPF)

Heading	Policy / Objective Provision	Compliance
Section 1.2 -	<i>“There will be a major new policy emphasis on renewing and developing existing built-up areas rather than continual expansion and sprawl of cities and towns out into the countryside, with a target of at least 40% of new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites”</i>	The requested CDP Objective to encourage the redevelopment of village brownfield sites in Na Forbacha to provide for modest residential development would be consistent with the latter provisions of the NPF.
Section 2.2 – Compact Growth	<i>“Making better use of under-utilised land and buildings, including ‘infill’, ‘brownfield’ and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport.”</i>	The requested CDP Objective to encourage the redevelopment of village brownfield sites in Na Forbacha to provide for modest residential development would be consistent with the latter provisions of the NPF.

Section 2.6 - Securing Compact and Sustainable growth	<p><i>“A preferred approach would be compact development that focuses on reusing previously developed, ‘brownfield’ land, building up infill sites, which may not have been built on before and either reusing or redeveloping existing sites and buildings.</i></p> <p><i>An increase in the proportion of more compact forms of growth in the development of settlements of all sizes, from the largest city to the smallest village, has the potential to make a transformational difference. It can bring new life and footfall, contribute to the viability of services, shops and public transport, increase housing supply and enable more people to be closer to employment and recreational opportunities, as well as to walk or cycle more and use the car less.”</i></p>	The requested CDP Objective to encourage the redevelopment of village brownfield sites in Na Forbacha to provide for modest residential development would be consistent with the latter provisions of the NPF.
National Policy Objective 3a	<p><i>“Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.”</i></p>	The requested CDP Objective to encourage the redevelopment of village brownfield sites in Na Forbacha to provide for modest residential development would be consistent with the latter NPF Objective.
National Policy Objective 4	<p><i>“Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.”</i></p>	The requested CDP Objective to encourage the redevelopment of village brownfield sites in Na Forbacha to provide for modest residential development would be consistent with the latter NPF Objective.
National Policy Objective 6	<p><i>“Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.”</i></p>	The requested CDP Objective to encourage the redevelopment of village brownfield sites in Na Forbacha to provide for modest residential development would be consistent with the latter NPF Objective.
National Policy Objective 11	<p><i>“In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.”</i></p>	The requested CDP Objective to encourage the redevelopment of village brownfield sites in Na Forbacha to provide for modest residential development would be consistent with the latter NPF Objective.
National Policy Objective 13	<p><i>“In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.”</i></p>	The requested CDP Objective to encourage the redevelopment of village brownfield sites in Na Forbacha to provide for modest residential development would be consistent with the latter NPF Objective.
National Policy Objective 36	<p><i>“Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.”</i></p>	The requested CDP Objective to encourage the redevelopment of village brownfield sites in Na Forbacha to provide for modest residential development would be consistent with the latter NPF Objective.

Therefore, recent strides in national residential planning policy has moved away from the overprotection of existing character. This has been replaced by a drive towards the efficient use of brownfield within built up areas, including villages, in the interest of consolidated development. Accordingly, the requested CDP Objective is consistent with the provisions of the NPF, and the Hierarchy of Planning Policy guidance

3.0 Consistency with Regional Spatial and Economic Strategy (RSES)

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.”*

In this regard we refer to Section 3.5 of the RSES entitled *“Smaller Towns, Village and Rural Areas”* which states that;

“The regeneration of our smaller towns and villages is now a major priority action for our region, which provides an opportunity to address legacy issues and to turn around their fortunes. The health of our villages and towns can be significantly influenced through the delivery of new housing through the utilisation of existing buildings, brownfield/infill sites or otherwise. The NPF target for at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites is an important opportunity for our smaller towns and villages to be re-imagined and therefore it is included as a key objective.”

Therefore, the re-utilisation of brownfield sites within villages (such as Na Forbacha), to provide for housing is a Key regional policy objective. As such, the inclusion of a similar provision within the forthcoming CDP is required in the interest of consistency in the hierarchy of Plans.

Section 3.5 of the RSES also provides that *“The reuse and regeneration of the existing building stock within the core area, development of brownfield and gap sites and the organic development of these places needs to be considered, to create more liveable places that people want to live, work and spend time in as their place of choice.”*

Again the requested CDP objective to allow for the redevelopment of brownfield sites within the village of Na Fobacha, would be consistent with the provisions of the RSES.

Finally, the principle of replacement is also reinforced by Objective RPO 3.8 of the RSES which sets out to *“Support the design of new/replacement/ refurbished dwellings to high energy efficiency standards that fully avail of renewable technologies, maximise solar gain, utilising modern materials and design practices.”*

4.0 Consistency with existing provisions of the CDP

The requested “village redevelopment” Objective for Na Forbacha as part of the forthcoming CDP, would be consistent with the provisions of the Settlement Strategy Objective SS7 of the current CDP entitled *“Development of Small Settlements”*. This provides that *“In the case of smaller settlements for which no specific plans are available, development shall be considered on the basis of its connectivity, capacity (including social, cultural, and economic, infrastructural and environmental capacity) and compliance with the Core Strategy and Settlement Strategy, good design, community gain and proper planning and sustainable development.”*

5.0 Consistency with provisions of the EPA code of Practice

From an environmental and groundwater protection perspective, the upgrading of outdated septic tank/ cess pit systems with modern and efficient proprietary treatment systems is commonly accepted by Planning Authorities. However, we would be of the opinion that this should be clearly supported as an Objective within the CDP, in order to facilitate modest redevelopment proposals within villages such as Na Forbacha, where there is no public sewer available. Furthermore, the principle of effluent treatment plan upgrade is also supported by the EPA Code of Practice (CoP). In particular, this provides that *“Variances to the CoP requirements may be*

considered by the local authority when it is satisfied that the proposed upgrade will provide improved treatment and reduced environmental impact.”

Therefore, the request to include an objective encourage the redevelopment of village brownfield sites, where upgraded effluent treatment plants are proposed, would be consisted with the recommendations of the EPA CoP.

6.0 Opportunity for enhanced streetscape & Urban Design Intervention

Owing to its attractive coastal location, within close proximity to Galway City, the village of Na Forbacha has experienced a significant level of growth and development pressure in recent years. This trend is likely to continue during the forthcoming Plan period. However, despite the level of growth experienced, the village centre is devoid of urban enclosure, with no discernible streetscape present. In this context, the requested objective to facilitate redevelopment of brownfield sites, would present opportunities for higher quality urban design intervention within the village. This could allow for reduced set backs/enclosed building lines from the R336 to facilitate streetscape enhancement, which would positively contribute towards the creation of a sense of place within the Village.

7.0 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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