

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 relates to linguistic and occupancy requirements for clustered/multiple residential developments within the village of Na Forbacha (Furbo). In this regard, we understand that an updated “Gaeltacht Plan” will form part of the new County Plan.

In essence, this submission requests a change to the Gaeltacht Residential Qualification for multiple/clustered residential development within the village of Na Forbacha as follows;

- (1) Reduce the proportion of residential units subject to a Language Enurement Clause from 80% of the units, to the percentage of persons using the Irish language on a daily basis in the village of Na Forbacha, in accordance with the latest census.**
- (2) Reduce the duration of the Language Enurement Clause from 15years to 7years.**

In other words, the submission requests a relaxation of occupancy requirements for clustered housing developments within Na Forbacha village. This would be in line with the level of Irish spoken in the area and would be more consistent with National and Regional Planning Policy.

2.0 Current Linguistic Restrictions within the village

The current County Development Plan 2015-2021 and the accompanying Gaeltacht Plan -Variation 2(a), sets out the linguistic controls for the area. In this regard, the Gaeltacht area is divided up into a number of “Districts”, and the village of Na Forbacha is located within “*District D- Cois Fharráige.*” (See Figure 1 below).

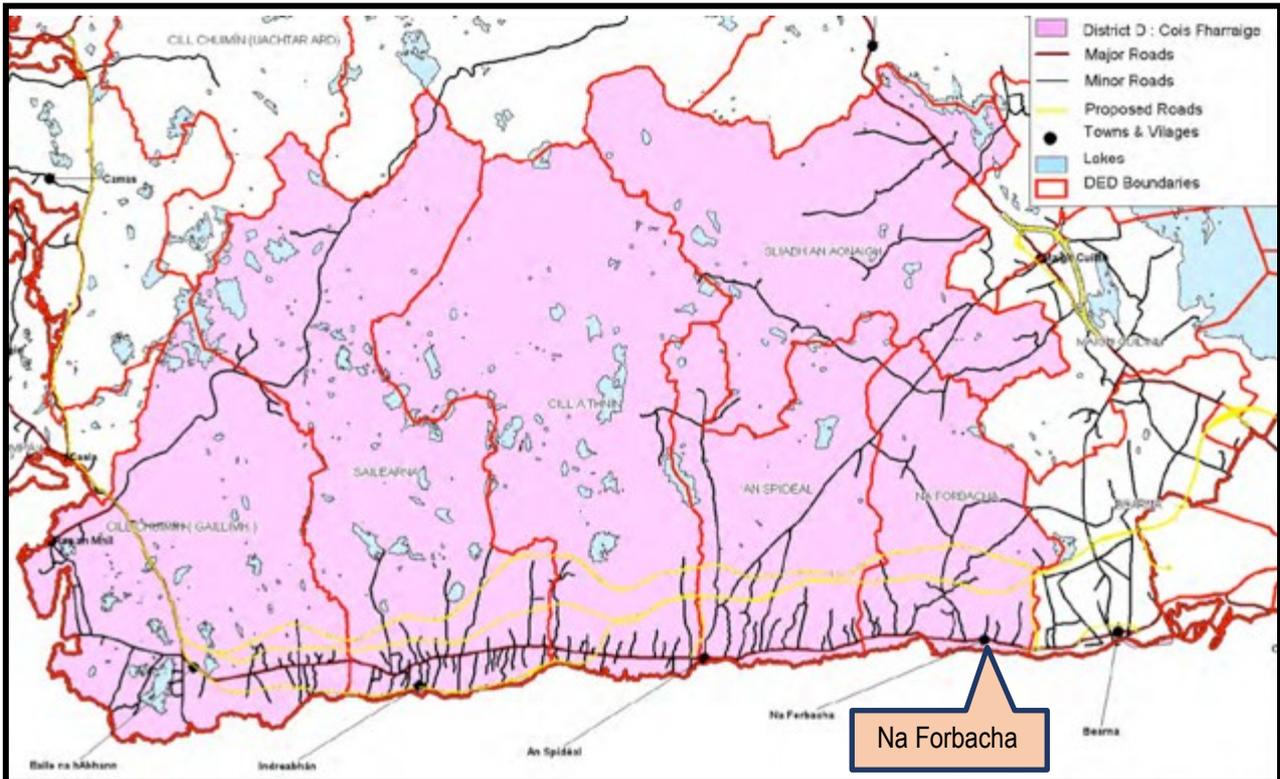


Figure 1: Extract from former Gaeltacht LAP showing location and extent of “Gaeltacht District D (Cois Fharraige)”, containing the settlement of Na Forbacha.

Objective GL10 of the current Gaeltacht Plan sets out the “*Language Enurement Clause for Two or More Houses in District D (Cois Fharraige)*” This requires that the “*Language Enurement Clause will be applied on a portion of residential units in development of two or more units in identified settlements in District D (Cois Fharraige). The proportion of homes to which a language enurement clause will be a minimum of 80% or to the proportion of persons using Irish Language on a daily basis, in accordance with the latest published Census whichever is greater.*”

Furthermore, Objective UHO 12 of the current CDP entitled “*Linguistic Impact Statements*” provides that “*Galway County Council shall require the submission of a Linguistic Impact Statement for housing proposals for two or more houses in the Gaeltacht area in order to protect and strengthen the Irish language and cultural heritage of the Galway Gaeltacht areas. A Language Enurement Clause of 15 years duration shall apply to approved developments, of two or more units.*”

Therefore, the current policy within Na Forbacha requires that a minimum 80% of units within a multiple housing scheme be restricted by way of an Irish Language Enurement for a 15 year period. It is considered that the latter impositions represents excessive and impractical restrictions on residential development proposals and results in a number of negative planning and development implications.

3.0 Planning & Development Implications of existing Linguistic Controls in Na Forbacha village

The 80% Linguistic requirement / 15 year enurement also has the effect of narrowing the possible demand base of prospective homeowners to a very small demographic. Furthermore, the duration of the Language Enurement clause of 15 years is considered to be excessive, and is disconnected to the changing circumstances of families and homeowners alike. In this regard, it is considered that an Enurement Clause period of 7 years would be more reasonable and would be consistent with the duration imposed for Housing Need Enurement clauses in the County.

National planning policy would encourage multiple residential development within towns and villages, However, the imposition of excessive linguistic requirements is counterproductive in planning terms. In this regard, it is

noted that there are no linguistic occupancy restrictions imposed on one off houses within the village/ and or within the open countryside. As such, the potential to provide for sustainable clustered housing proposals within villages such as Na Forbacha is unreasonably constrained. Furthermore, the imposition of excessive linguistic restrictions on proposals for “two or more houses” has had the effect of encouraging a proliferation of one off housing within the designated settlements in the area.

In recent years Cois Ferraige area within the Gaeltacht Local Area Plan & GTPS, has continued to experience high pressure for unsustainable and urban generated one off housing in the Countryside. In response, the relaxation of occupancy requirements for housing developments within designated settlements (where commercial and community services are located) would serve to relieve this pressure.

In support of this submission, we refer to the provisions of the Rural Housing Guidelines. Section 2.3 of the Rural Housing Guidelines entitled ‘Strengthening rural villages and towns’ states that;

“Difficulties in securing affordable and high quality housing in cities, towns and villages are frequently cited as the reason why many people seek to build houses in the open countryside.

Planning authorities need to ensure that cities, towns and villages offer attractive and affordable housing options to meet the housing needs of urban communities and persons wishing to live in urban areas. This will assist in mitigating excessive levels of pressure for urban generated development in rural areas, especially those closest to the environs of cities and towns. It will also enhance the availability and affordability of sites and housing in rural areas to meet the housing needs of the established rural community.”

In this regard, the imposition of an excessive linguistic requirement/enurement restriction add another layer of difficulty in providing housing within the village of Na Forbacha.

Furthermore, the recently adopted RSES also recognises the role of villages in providing low density housing as a more sustainable alternative to one off housing. In this regard we refer to Section 3.5 of the RSES entitled “Smaller Towns, Village and Rural Areas” which states that “in all cases, the approach should be to provide arrange of attractive housing choices appropriate to the needs and character of the place, including the provision of serviced sites and to provide for low-density housing demand, as an alternative to living in one-off houses outside towns and villages.”

4.0 Level of Irish Spoken Daily within Na Forbacha ED

Since 2006, the Census includes more detailed questions in relation to the strength of the Irish language within a given ED. In this regard we refer to the category “Irish speakers aged 3 and over by frequency of speaking Irish.” In particular, we refer to the amount of people within the ED who “Speak Irish within the education system only” who “Speaks Irish Daily, inside and outside the education system” and those who “Speak Irish outside the education system daily.” These combined figures provide a reliable indicator of the vitality of Irish as a Community language within ED’s.

Table 1 below demonstrates the frequency of Daily Irish Speakers within Bearna (Part Rural) ED compared to neighbouring ED’s in 2011 and 2016 respectively. It is important to note that the village of Na Forbacha only represents a proportion of the ED of Na Forbacha.

Table 1: Population and Daily Irish Speakers¹ in Na Forbacha (ED) and Neighbouring ED's, 2011 & 2016

ED	Population (ED) 2011	Population (ED) 2016	No. of Daily Irish Speakers 2011	% of Daily Irish Speakers 2011	No. of Daily Irish Speakers 2016	% of Daily Irish Speakers 2016	% Change 2011-2016
Na Forbacha	1,312	1,415	542	41.3%	505	38.5%	-2.8%
Bearna (Part Rural)	3,630	3,727	944	26%	942	25.3%	-0.7%
Maigh Cuillin	2,008	2,142	503	25%	473	22.1%	-2.9%
An Spidéal	1,450	1,443	898	61.9%	907	62.9%	1%
Sliabh an Aonaigh	763	763	238	31.2%	208	27.3%	-3.9%

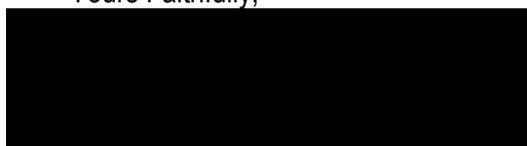
Table 1 indicates that 505 of the 1,415 persons living in the Electoral District of Na Forbacha in 2016 (**38.5% of the population**) can be classified as Daily Irish Speakers. Therefore, Table 1 demonstrates that between 2011 and 2016 the ED of Na Forbacha experienced a slight increase in population (+7.8% change) together with a marginal decrease in the proportion of daily Irish speakers (-2.8% change). Therefore, the recent population increase did not result in significant adverse impact on the frequency of Daily Irish Speakers in the area.

Owing to the fact that **38.5%** of the population speak Irish on a daily basis within the ED of Na Forbacha, the current CDP linguistic requirement for 80% for new homes, is entirely excessive. As such, it is considered reasonable to ***“Reduce the proportion of residential units subject to a Language Enurement Clause from 80% of the units, to the percentage of persons using the Irish language on a daily basis in the village of Na Forbacha, in accordance with the latest census.”***

It is considered that the requested amendment is balance and reasoned, and would provide for an appropriate level of linguistic control within the village, commensurate to the level of Irish spoken in the area, whilst enabling the delivery of modest multiple housing within the village of Na Forbacha.

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,



Senior Planning Consultant,
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Planning Consultancy Services

¹ This includes the number of Daily Irish Speakers aged 3 and over within the ED includes those who; Speak Irish Daily within education system only; those who Speak Irish daily within and also outside the education system and;; those who Outside the education system daily. This is expressed as a % of the overall population of the ED.