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CDP Review,
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7th September 2020

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

A Chara,

I have been instructed by my clients **William Gordon & Sheila Gibson**, to prepare a submission in relation to the forthcoming “*Core Strategy*” and “*Garraun Framework Plan*” which we understand will form part of the new Draft County Development Plan.

This submission essentially requests the Council to;

- (1) **Ensure there is a sufficient increase in the Core Strategy population for the “Garraun Framework Plan” to accommodate MASP growth targets and higher density residential development**

1.0 Location & Context

The Garraun area is located within the designated extent of the Galway Metropolitan Area Strategic Plan (MASP), as identified in the Regional Spatial & Economic Strategy (RSES).

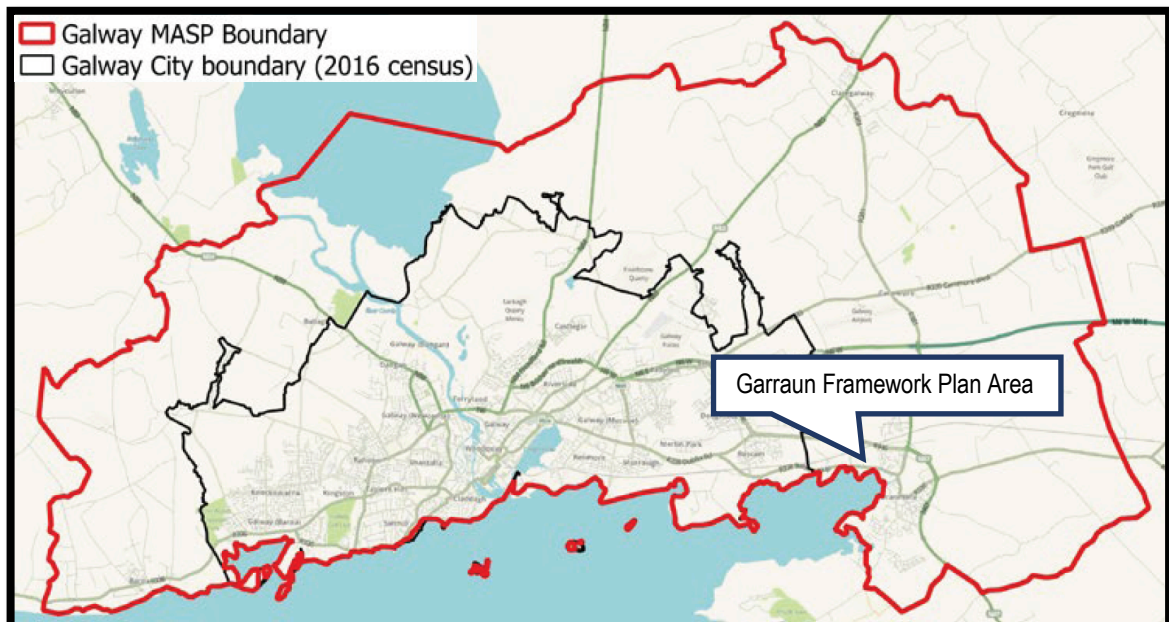


Figure 1: Extract from RSES showing the indicative location of Garraun Framework Plan Area within the MASP boundary.

The role of MASP and the location of Garraun/Oranmore within this area is reinforced in the “2020 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. Within County Galway; Oranmore,*

Baile Chláir and Bearná now form part of the (MASP) area. The metropolitan area straddles the boundary with Galway City Council which will require close collaboration in delivering housing and jobs within the metropolitan area.”

My clients wish to point out that they are the beneficial owners of lands extending to c.9.48 hectares, which are located to the north west of Oranmore town 350m to the east of the Oranmore Train Station (Land Registry Folio No. GY14438 refers). The “subject lands” are bounded by the Costa na Mara housing estate to the east, the “Galway to Dublin” Railway line to the north, undeveloped lands to the west and “An Inse Glas” Housing estate under construction to the southwest/west. The subject lands have the benefit of road frontage where the 60kmph speed limit applies. The subject lands can be fully serviced by the water and sewerage network in the area, where there is currently adequate capacity available.

The lands are in greenfield condition. The topography of the site is generally flat. The subject lands do not have any built or natural heritage designations on site and are not identified as an area with adverse flood risk constraints..

The subject lands are currently located within the urban boundary of the Oranmore Local Area Plan. However, we note that the Planning Authority are currently preparing a “Framework Plan” for the Garraun Area, which will form part of the forthcoming Draft County Development Plan. The location and extent of the subject lands vis-à-vis the existing LAP and the proposed Framework Plan is identified in Figure 2 below.

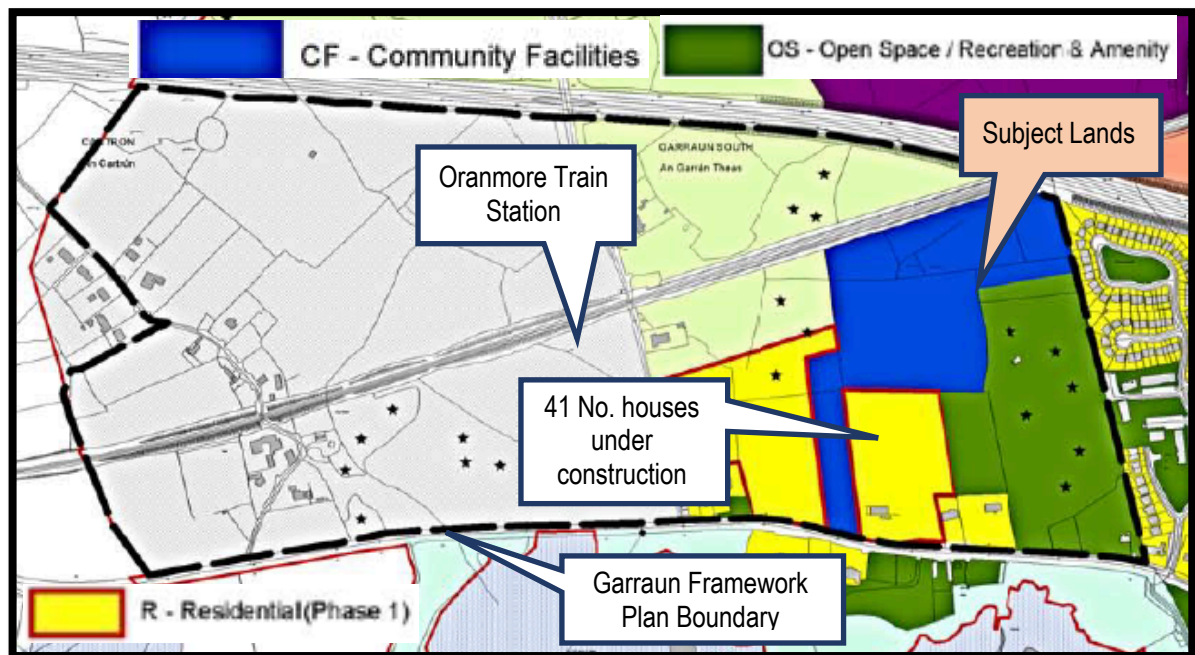


Figure 2: Indicative location of subject lands, within the “Garraun Framework Plan” Study area. The map shows the proximity to the train station as well as the existing Land Use Zones as per the current Oranmore Local Area Plan.

The “Garraun Framework Plan” will provide for the identification of strategic development lands surrounding the railway station and will provide for a sequential urban extension to the town of Oranmore.

2.0 Grounds of Submission

This submission essentially requests the Council to;

(1) Ensure there is a sufficient increase in the Core Strategy population for the “Garraun Framework Plan” to accommodate MASP growth targets and higher density residential development

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 lands within the “*Garraun Framework Plan*” are discussed below.

2.1 Proximity to Train Station

The key advantage of lands within the “Garraun Framework Area” is the proximity to Oranmore Railway station. With the adoption of suitable objectives, the proposed “Framework Plan” has the potential to enable higher density residential development close to the train station.

At present, the Oranmore Railway Station at Garraun is currently “detached” and removed from the town of Oranmore. In contrast, the proposed “Framework Plan” has the potential to accommodate efficient and sustainable integrated land use and transportation benefits at this location.

2.2 Compliance with Development Plan Guidelines

The Section 28 Ministerial Guidelines on “*Development Plans*” continue to be a key advisory source in the preparation of new Development Plans. In this regard, we would submit that the proposed “*Garraun Framework Plan*” would be in accordance with the latter Guidelines. In particular, an adequate core strategy population allocation, would potentially enable higher residential development close to the station and would be consistent with Land Use and Transportation Strategy advice outlined in the Guidelines. In this regard Section 3.11 states that;

“Integrated land use and transport planning has a key role in delivering social, economic, and environmental sustainability. By seeking to influence the location, scale, density, design, and mix of land uses, and thus shape patterns of development, planning can help to facilitate an efficient transport and land use system by:

- *facilitating a move towards sustainable modes of transport e.g., public transport, cycling, walking.*
- *making it easier for people to access employment and services;*
- *facilitating the operation of labour markets;*
- *reducing the impact of transport on communities;*
- *improving freight flows and access to key ports and airports;*
- *providing for the efficient distribution of goods and services to business and the community;*
- *providing a choice of travel modes; and*
- *ensuring flexibility to meet the demands of a changing economy and market conditions.”*

This section of the Guidelines also recommends the following statement of policies, be adopted to;

- *“minimise the need for travel*
- *reduce the length of journeys,*
- *maximise the proximity of people, business and the services they require,*
- *encourage more urban movement involving walking, cycling and public transport*
- *promote greater investment in and usage of public transport modes such as rail and bus networks, with*

- *the support of complementary land use policies.”*

An adequate Core Strategy Population allocation for Garraun, would potentially facilitate higher density residential development, adjacent to the train station, which would enable the achievement of the Integrated Land Use and Transportation benefits espoused in the latter Guidelines.

2.3 Compliance with Sustainable Residential Guidelines

Higher density residential development in locations close to railway stations is specifically encouraged in the Section 28 Ministerial Guidelines for Planning Authorities entitled *“Sustainable Residential Development in Urban Areas (Cities, Towns & Villages).”*

In particular, Section 5 of the latter Guidelines (SRD’s) identifies certain locations where Higher Density development should be delivered. In this regard, Section 5.8 identifies *“Public Transport corridors”* and states that *“it is important that land use planning underpins the efficiency of public transport services by sustainable settlement patterns – including higher densities – on lands within existing or planned transport corridors.”*

In response, an adequate Core Strategy population allocation for Garraun, at a location adjoining the existing public transport rail corridor, is in accordance with the guidelines.

Section 5.8 of the SRD’s also provides that;

“Walking distances from public transport nodes (e.g. stations/halts/bus stops) should be used in defining such corridors. It is recommended that increased densities should be promoted within 500 metres walking distance of a bus stop, or within 1km of a light rail stop or a rail station. The capacity of public transport (e.g. the number of train services during peak hours) should also be taken into consideration in considering appropriate densities. In general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations / bus stops, and decreasing with distance away from such nodes. Minimum densities should be specified in local area plans, and maximum (rather than minimum) parking standards should reflect proximity to public transport facilities.”

In response, an adequate population allocation for the Garraun area, to accommodate higher density development close to the train station, would accord with the latter Guidelines.

In addition, higher density apartment development, located within 10 minutes walking distance of commuter rail, is encouraged under the 2018 Ministerial Guidelines for Planning Authorities entitled *“Sustainable Urban Housing: Design Standards for New Apartments”*.

2.4 Compliance with Regional Spatial & Economic Strategy

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.”*

As set out in Figure 1 above, the *“Garraun Framework Plan Area”* 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>Section 3.6.3 – Strategic Growth Areas</p>	<p><i>“Galway Metropolitan Area has considerable land capacity that can significantly contribute to meeting the housing demands based on population targets set out in the NPF and the RSES.</i></p> <p><i>The targets are that:</i></p> <ol style="list-style-type: none"> <i>1. Population of Galway MASP to grow by 25,000 to 2026 and by 38,300 to 2031 with the population of the City and Suburbs accommodating 19,200 to 2026 and 28,000 to 2031.</i> <i>2. Deliver at least half (50%) of all new homes that are targeted within the MASP to be within the existing built-up footprint.”</i> 	<p>Garraun is located within the MASP growth area. As such, lands within the Garraun Framework Plan have the capacity to meet the housing demands based on population targets outlined in the RSES. As such a higher population allocation within the Garraun area is warranted.</p> <p>The MASP envisages very significant increases in population within the MASP area up to the years 2026 and 2031 respectively. By subtracting the “City and Suburb” population allocation from the overall MASP population allocation, it is possible to identify the population growth target for the outlying MASP area (including Oranmore). This would amount to a projected population growth of 5,800 by the year 2026 and a growth of 10,300 persons by the year 2031. Therefore, a suitable population allocation in the Core Strategy for the Garraun area is warranted. Furthermore, the consideration of suitable lands at Garraun to cater for higher residential development has the potential to modestly contribute towards the achievement of this population projection, and would be entirely consistent with this RSES growth target.</p> <p>The Garraun Framework plan is located within the MASP boundary, adjoining the train station. As such, the requested increase to the population allocation for the Garraun area, as part of the forthcoming core strategy, would be entirely consistent with this RSES growth target.</p>
<p>Section 3.6.3 – Strategic Growth Areas</p>	<p><i>“The strategic sites of scale that present the opportunity and capacity to deliver the quantum of housing on the appropriate sites, subject to the adequate provision of services are summarised as follows Baile Chláir, Bearn, Oranmore, Briarhill.”</i></p>	<p>This section of the RSES specifically identifies Oranmore as a growth centre to deliver the stated housing targets.</p>
<p>Section 3.6.3 – Strategic Growth Areas</p>	<p><i>“The Assembly supports the proposition that 50% of new homes for the population targets will be constructed within the existing city development envelope, 40% of these shall be located on infill and/or brownfield sites.”</i></p>	<p>Owing to Garraun’s location within the MASP boundary, adjacent to the train station, it is most appropriate to accommodate future homes to meet the required population targets.</p>

<p>Section 3.6.3 – Strategic Growth Areas</p>	<p><i>“The Strategy is to provide for integration of housing with transportation infrastructure fostering sustainable transport patterns. This provides for a co-ordinated approach with investment and the delivery of essential infrastructure, services and community facilities.”</i></p>	<p>Owing to Garrauns location within the MASP boundary, adjacent to the train station, the consideration of suitable lands for higher density residential development will deliver efficient and sustainable integrated land use and transportation benefits, in accordance with the vision outlined in the RSES.</p>
<p>Regional Policy Objective No. 9</p>	<p><i>“Deliver on the population targets for the Metropolitan and Regional Growth Centres through compact growth.”</i></p>	<p>The requested higher population allocation for the area, with the potential to cater for higher residential development, will contribute towards the ultimate delivery of the population targets with the MASP.</p>

The “2020 CDP Issues Paper” acknowledged that the Core Strategy will need to be updated to accommodate the projected growth for the MASP area as set out in the RSES. In this regard it refers to the MASP boundary *“encompassing Oranmore, An Bearnna and Baile Chláir. It is envisaged that these areas as key economic drivers within Metropolitan Galway will accommodate significant population increases and jobs within the lifetime of this new Galway County Development Plan 2022–2028.”*

In summary, the “Garraun Framework Plan Area” is strategically located within the MASP Boundary. Accordingly, an adequate population allocation for the Garraun area, together with the consideration of suitable lands for higher residential development, would in a modest way contribute towards the delivery of strategic and targeted growth in population, as set out in the MASP & RSES.

The strategic location advantages of the Garraun area is acknowledged in the RSES. As such, an adequate Core Strategy population allocation for Garraun together with the consideration of suitable lands for higher residential development, would in a modest way contribute towards the delivery of strategic population growth targets, as set out in the MASP & RSES.

2.5 Serviceability of Garraun Area

Lands within the Garraun Area are serviceable. An existing 350mm diameter IW Water main runs along the Coast road to the south. Furthermore, the Oranmore to Merlin Park IW sewer rising main runs along the Coast road to the south and a 225mm diameter sewer was provided along the Coast road to service the 41. No. houses permitted under Pl. Ref. No. 16/1262 (An Inse Glas).

The strategic potential of Oranmore is again reinforced in the MASP section of the RSES. This states that *“There is potential for Oranmore to accommodate an increase in population allocation and it is serviced through the Mutton Island Wastewater Treatment Plant. That plant has in recent years been upgraded to ensure population growth can be achieved while at the same continuing to protect bathing water quality. The East Galway Main Drainage Scheme shall be a key enabler for the larger area of Oranmore and Ardaun to the north, which shall enable the strategic potential offered by the rail terminus at Garraun.”*

Therefore the serviceability of the Garraun area, together with the strategic potential of the rail station, is specifically acknowledged within the MASP/RSES. The requested population allocation for the area, will help to realise this potential.

2.6 Attractiveness of Oranmore/Garraun for additional growth

Apart from infrastructural capacity, Oranmore town has a number of key advantages compared to many other towns in County Galway, to facilitate higher density development. These include;

- An attractive and scenic coastal location
- A viable railway station, with the potential for increased service frequencies and capacity increases
- Excellent transport links to Galway City, the M6 (to Dublin) and the M18 (to Limerick)
- A generous provision of community and sporting facilities located within the town, as well as within the towns immediate hinterland.
- National and secondary schools, and all relevant community facilities and services
- Modern and extensive retail and commercial facilities in the heart of the town centre

All of the above attributes means that lands at Garraun Oranmore has the ability to accommodate higher density residential development during the plan period. Therefore, the request for a sufficient population allocation within the Core Strategy for the “*Garraun Framework Plan*” area, is entirely justifiable in this case.

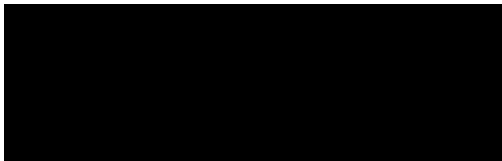
2.7 Absence of Environmental, Natural or Built Heritage Constraints

It is envisaged that the requested population allocation for Garraun, 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 clients 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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