



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,

I have been instructed by my client **Oisín Kenny**, to prepare a submission in relation to the forthcoming “*Core Strategy*” and “*Baile Chláir 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 allocation for “Baile Chláir” to accommodate MASP growth targets and higher density development**
- (2) **Consider an amendment to the Plan Boundary extent**

1.0 Location & Context

The subject lands are located in the townland of Cathair Gabhain (Cahergowan) within the urban envelope of Baile Chláir (Claregalway), to the north-east of Galway City. In spatial terms, the settlement of Baile Chláir can be described as a “*Satellite Town*” to the City. However, this area is earmarked for strategic growth purposes. In particular, it is located within the designated extent of the Galway Metropolitan Area Strategic Plan (MASP), as set out in the Regional Spatial & Economic Strategy (RSES).

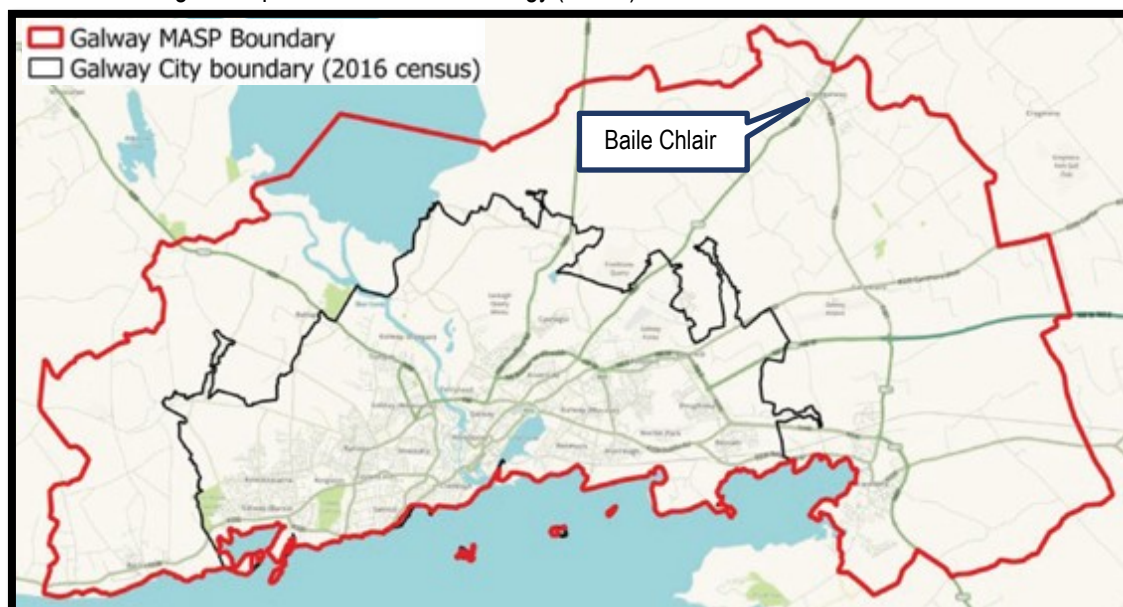


Figure 1: Extract from RSES showing the indicative location of the subject site within the Galway MASP Boundary.

The role of Galway MASP and the location of Baile Chláir within this area is reinforced in the 2020 CDP Issues Paper. Under the heading “*Urban Living & Placemaking*” it refers to the fact 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.*”

In spatial terms, the settlement of Baile Chlair can be described as a self-sufficient town, within a convenient commuting distance to the north-east of Galway City. In particular Baile Chlair has the benefit an public sewerage and water main networks, both of which have available capacities to cater for additional development.

The existing Core Strategy has the potential to constrain development and the delivery of targeted population growth in Baile Chlair. For example, the current Core Strategy is currently preventing the consideration of lands owned by my client for development, as the majority of the landholding is currently located outside of the Plan Boundary. In this regard we refer to c.18.6ha of lands at Cathair Gabhain (Land Registry Folio Ref GY82215F refers¹) which are centrally located on the north western side of the N83, within the 50kmph urban speed limit of Baile Chláir, adjacent to the existing commercial core, where footpaths and public lighting are insitu.

The topography of the subject lands are typically flat, do not have any built or natural heritage designations on site and are not identified as an area liable to flooding.

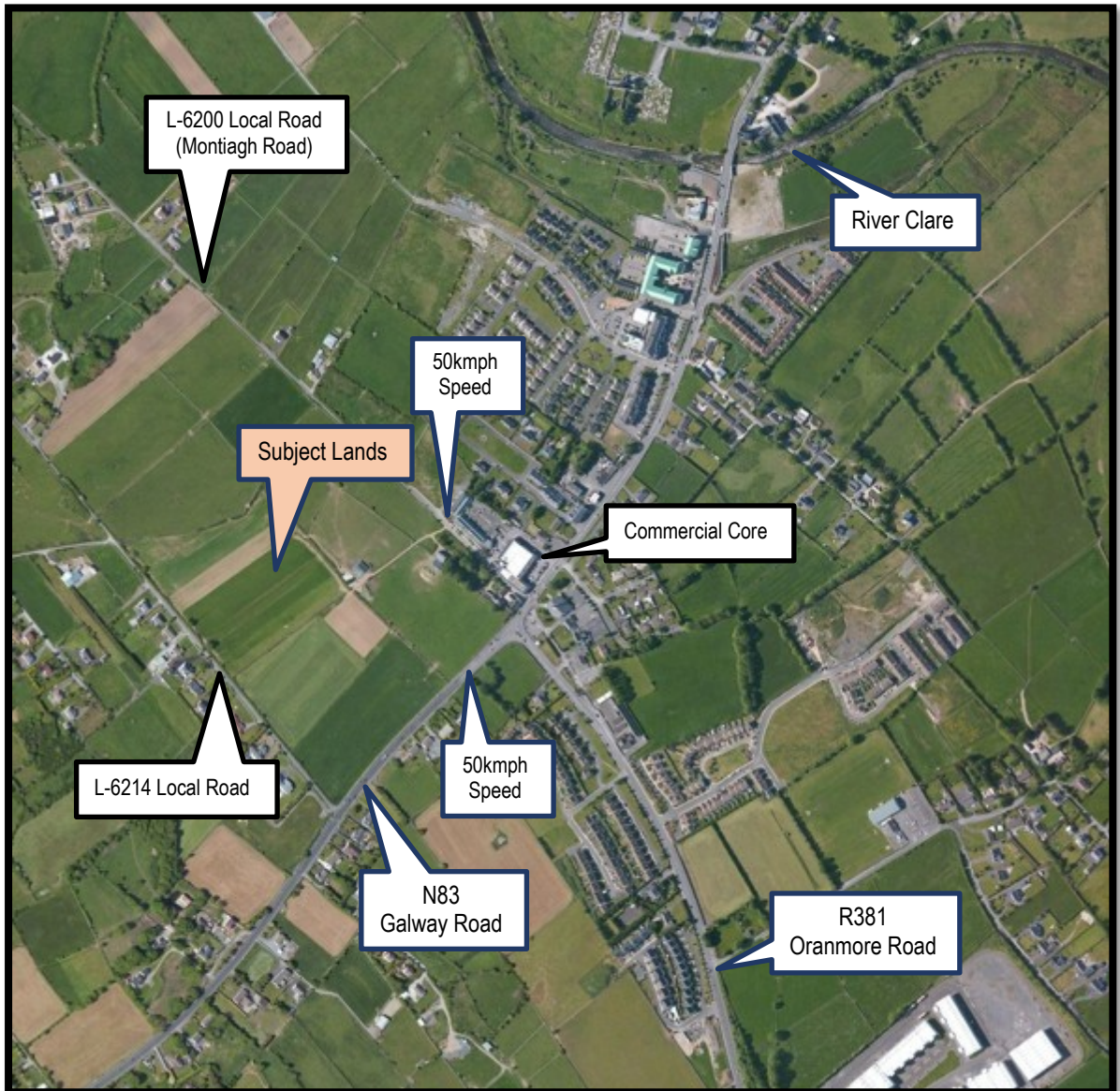


Figure 2: Map of Baile Chlair

¹ These lands have additional road frontage onto the L-6200 county road (Montiagh Road) to the north east and the L-6214 county road to the south-west.

2.0 Strategic Planning Context

Baile Chláir can be described as a strategic settlement, within the Metropolitan Area Strategic Plan (MASP), which is of regional and national importance. We trust that the proposed “*Baile Chláir Plan*” will acknowledge the strategic importance of this settlement within the Metropolitan area of Galway City, as well as the potential for the subject lands to cater for sustainable residential development in this context during the forthcoming plan period. The newly identified strategic role for the settlement together with the location advantages of the settlement and the subject lands is outlined in the Grounds of Submission below.

4.0 Grounds of Submission

This submission essentially requests the Council to;

- (1) **Ensure there is a sufficient increase in the Core Strategy population for “Baile Chláir” to accommodate MASP growth targets and higher density residential development**
- (2) **Consider an amendment to the Plan Boundary extent**

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 the subject lands are discussed below.

4.1 Locational Advantages of Baile Chláir & Subject Lands

Baile Chláir has a number of strong locational advantages to accommodate future development growth. These include the following;

- Its location within the Metropolitan Area Spatial Plan boundary
- Its convenient commuting accessibility to Galway City, Tuam & Parkmore
- Its proximity to Galway Airport which is designated for future employment uses
- Its wider accessibility, via the existing N83 /R381 and onto the M18/M6 to the east, with potential for enhanced future accessibility via the Galway City Ring Road (See Figure 4 below)
- The availability of a public sewerage network and public mains
- The presence of a vibrant commercial core within the settlement,
- The availability of road frontage within the 50kmph speed limit
- The availability of public footpaths and public lighting along the N83
- The availability of a public sewerage network and public mains
- The availability of local community facilities including local school and GAA facilities located within the settlement
- The availability of land within the settlement outside of flood risk and environmental sensitivities
- The potential to create enhanced streetscape interventions and urban enclosure opportunities.

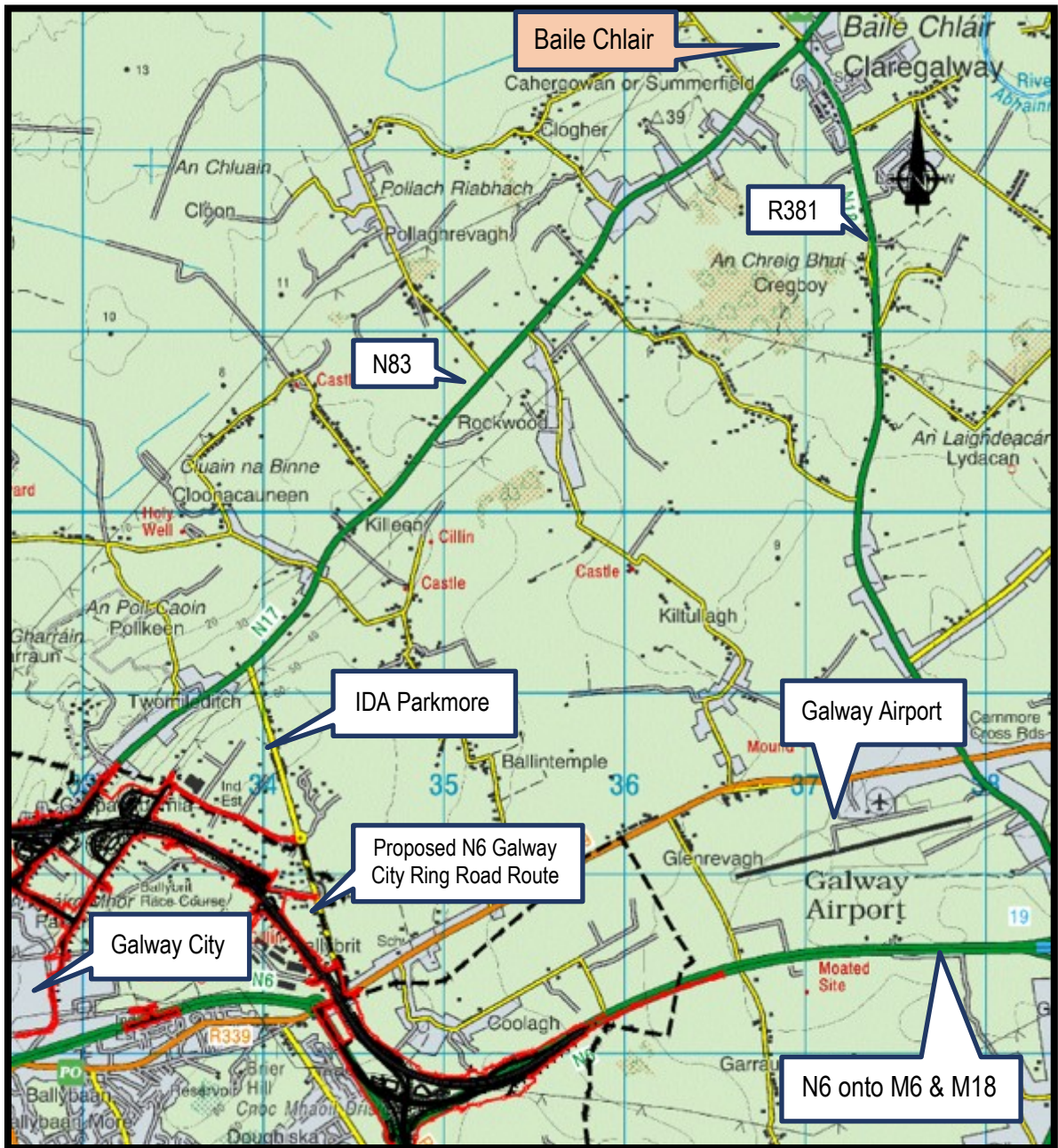


Figure 3: Extract from “Overall Location Plan” of Galway City Ring Road (GCRR) project, showing location and context of Baile Chláir, and wider accessibility of the area.

All of the above attributes of Baile Chláir, means that it has the ability to accommodate higher density mixed use development during the plan period. Therefore, the request for a sufficient population allocation within the Core Strategy for the “Baile Chláir” Plan area, is entirely justifiable in this case.

4.2 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 subject site 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> <p><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></p> <p><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>	<p>Baile Chláir is located within the MASP growth area. As such, the settlement capacity to meet the housing demands based on population targets outlined in the RSES. As such a higher population allocation within the Baile Chláir Plan 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 Baile Chláir). 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, an increased population allocation in the Core Strategy for the Baile Chláir area is warranted. Furthermore, the consideration of the lands at Baile Chláir to cater for higher density 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>Owing to Baile Chláir’s location within the MASP area, the requested increase to the population allocation for the Baile Chláir Plan 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</i> Baile Chláir, Bearna, Oranmore, Briarhill.”</p>	<p>This section of the RSES specifically identifies Baile Chláir as a growth centre to deliver the stated housing 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 Baile Chláir’s location within the MASP boundary, it is most appropriate to accommodate future homes to meet the required population targets.</p>

Regional Policy Objective No. 9	<i>“Deliver on the population targets for the Metropolitan and Regional Growth Centres through compact growth.”</i>	The requested higher population allocation for the area, together with the consideration of the subject lands for higher residential development, will contribute towards the ultimate delivery of the population targets with the MASP.
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The “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 summary, the subject lands are strategically located within the MASP area *and the urban envelope of “Baile Chláir”*. Accordingly, a suitable population allocation for the Baile Chláir Plan area, together with the consideration of the lands for higher density development, would in a modest way contribute towards the delivery of strategic population growth targets, as set out in the MASP & RSES.

In summary, Baile Chlair is strategically located within the MASP. Accordingly, a higher population allocation for the Baile Chlair area, 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.

4.3 Serviceability of Baile Chlair

The subject lands are serviceable. In this regard, we refer to the attached letter and service drawings prepared by Tobin Consulting Engineers (See **Appendix 1**). This confirms that the following services are available in Baile Chlair;

- Foul Sewer
- Watermains
- ESB
- Gas
- Road access within the 50kmph urban speed limit

We would submit that the availability of centrally located and serviceable lands within the towns of Co. Galway are becoming an increasingly rare commodity.

Therefore, owing to the serviceability of the settlement of Baile Chlair, together with its strategic designation within the RSES/MASP, a higher core strategy allocation for “Baile Chláir” together with the designation of the subject lands for higher density mixed use development, is entirely appropriate in this case.

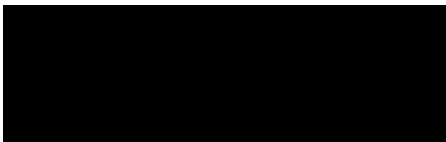
4.5 Absence of Environmental, Natural or Built Heritage Constraints

It is envisaged that the requested higher population allocation for Baile Chlair, 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.

5.0 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,



Senior Planning Consultant,
BA MRUP Dip APM
Planning Consultancy Services.

Appendix 1: Letter and Services Drawings prepared by Tobin Consulting Engineers

Appendix 1:
Letter and Services Drawings
prepared by Tobin Consulting Engineers



Fairgreen House
Fairgreen Road
Galway
H91 AXK8
Tel: + 353 (0)91 565211
Email: info@tobin.ie

Block 10-4,
Blanchardstown Corporate Park
Dublin
D15 X98N
Tel: + 353 (0)1 8030401
Email: info@tobin.ie

Market Square
Castlebar
Co Mayo
F23 Y427
Tel: + 353 (0)94 9021401
Email: info@tobin.ie

Our Ref: *BH10437-02-06*

7th September 2020

Galway County Council
County Buildings
Prospect Hill
Galway

RE: Oisín Kenny Lands at Claregalway and Associated Site Services

Dear Sirs,

We refer to the lands owned by Oisín Kenny at Claregalway and with reference to Mr. James O'Donnell, Planning Consultant's submission on the Galway County Council Development Plan. The lands are located in the centre of Claregalway village with road frontage on three sides including the N83 Claregalway to Galway road and two side roads the L6214 and L6200. We set out below the various services adjoining the Kenny lands at Claregalway.

Foul Sewer

We enclose extract from Irish Water mapping (A) showing the existing foul sewers servicing the lands. An existing 225mm foul sewer line runs along the N83 and L6200. Both the foul sewer network and treatment plant were recently upgraded, therefore a connection to service the lands is readily available subject to connection agreement with Irish Water.

Watermains

We enclose extract from Irish Water mapping (B) showing the existing watermains servicing the lands. A 250mm uPVC watermain on the N83 and a 150mm uPVC watermain on the L6200, therefore a connection to service the lands is readily available subject to connection agreement with Irish Water.

Stormwater

In line with current guidelines the design of the storm water system will be in accordance with SUDS, which will include on-site attenuation and ground percolation within the site. Therefore, all storm water will be dealt with on site and a connection to the public network will not be required to service future development.

Directors: M. Shelly (Chairman) C. McGovern (Managing Director) E. Connaughton (Company Secretary)
 B.J. Downes D. Grehan M. McDonnell R.F. Tobin
 B. Carroll S. Tinnelly

Associate Directors M. Casey P. Cloonan P. Cunningham B. Gallagher B. Heaney C. Kelly T. Mackey A. Mulligan J. O'Flaherty

Co. Reg. No. 42654 – Registered Office: Fairgreen House, Fairgreen Road, Galway H91 AXK8. Ireland.

ESB

We enclose extract from Irish Water mapping (C & D) showing the ESB network servicing the lands. A HV overhead ESB line crosses the lands close to the north west boundary of the lands. A LV overhead ESB line runs close to the N83 on the opposite side of the road, this line crosses the N83 and services the existing house and yard within the Kenny lands. Therefore, an ESB connection to service the lands is readily available subject to connection agreement with ESBNetworks.

Gas

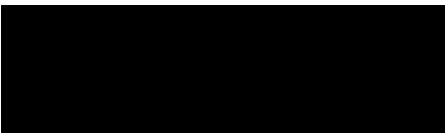
We enclose extract from Irish Water mapping (E) showing the gas network servicing the lands. A 125PE-80 4 bar runs along the L6200, therefore the option to service the lands with gas is there subject to agreement with Bord Gais Networks.

Roads

The lands fronts onto three roads the N83, L6214 and L6200, Access onto the N83 within the current Claregalway village speed limits is achievable subject to detailed design and agreement with the roads section of Galway County Council and Transport Infrastructure Ireland.

From the above it is clear that these lands are adjacent to all the required services to facilitate future development of the lands.

Yours sincerely



Brendan Heaney

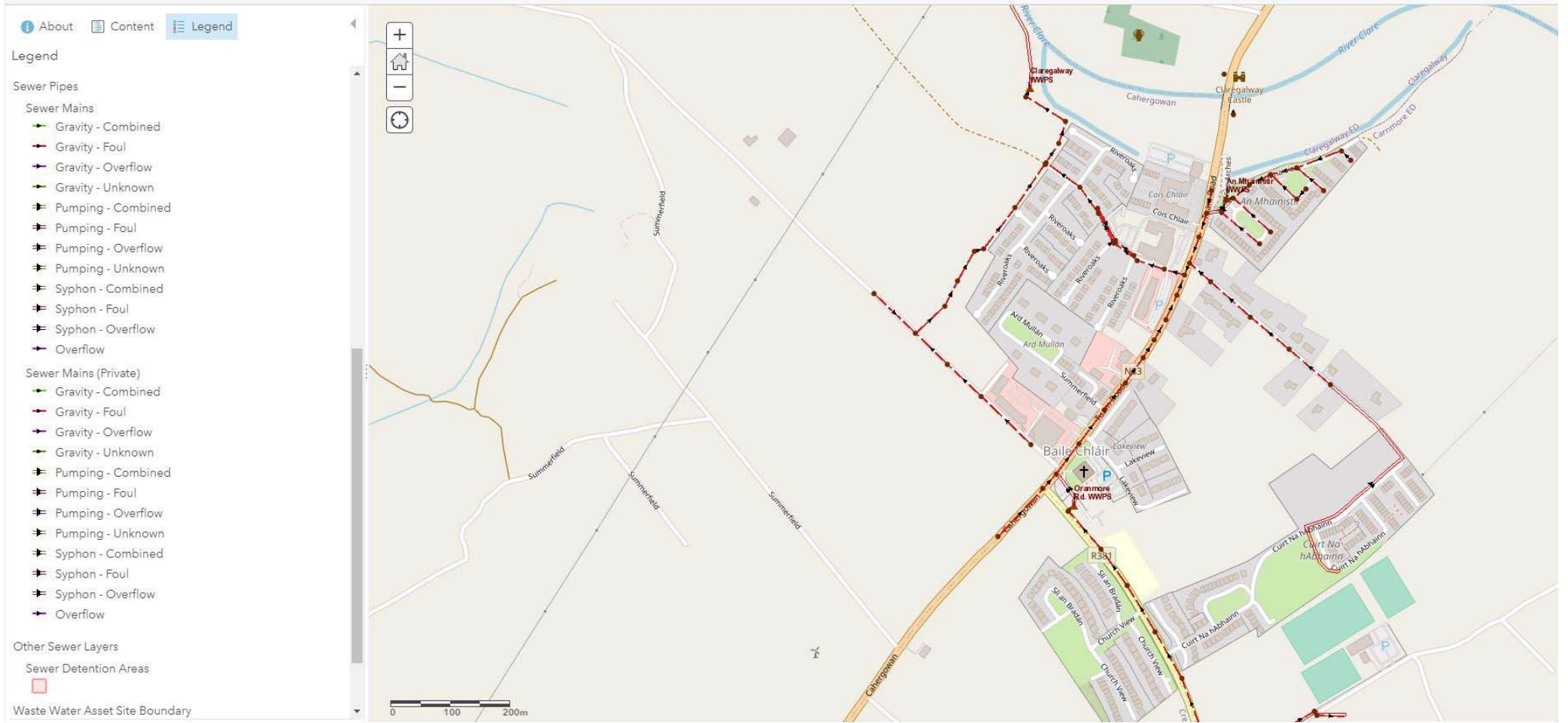
Associate Director – Operations Manager

For and on behalf of TOBIN Consulting Engineers

Brendan.heaney@tobin.ie

Encl: Extracts from Irish Water mapping





MAP A

- Legend**
- Private Water Network Structures**
- Storage Cell
 - Storage Tower
 - Dosing Point
 - Meter Station
 - Water Pump
 - Other; Unknown
- Water Pipes**
- Water Distribution Mains**
- Irish Water
 - Private
- Trunk Water Mains**
- Irish Water
 - Private
- Water Assets Not in Service**
- Water Pipes Not in Service**
- Proposed Water Pipes
 - Under Construction Water Pipes
 - Out of Service Water Pipes
 - Decommissioned Water Pipes
- Water Structures Not in Service**
- Proposed Water Structure
 - Under Construction Water Structure
 - Out of Service Water Structure
 - Decommissioned Water Structure
- Water Abandoned Assets**
- Water Abandoned Lines**
- Water Abandoned Points



MAP B

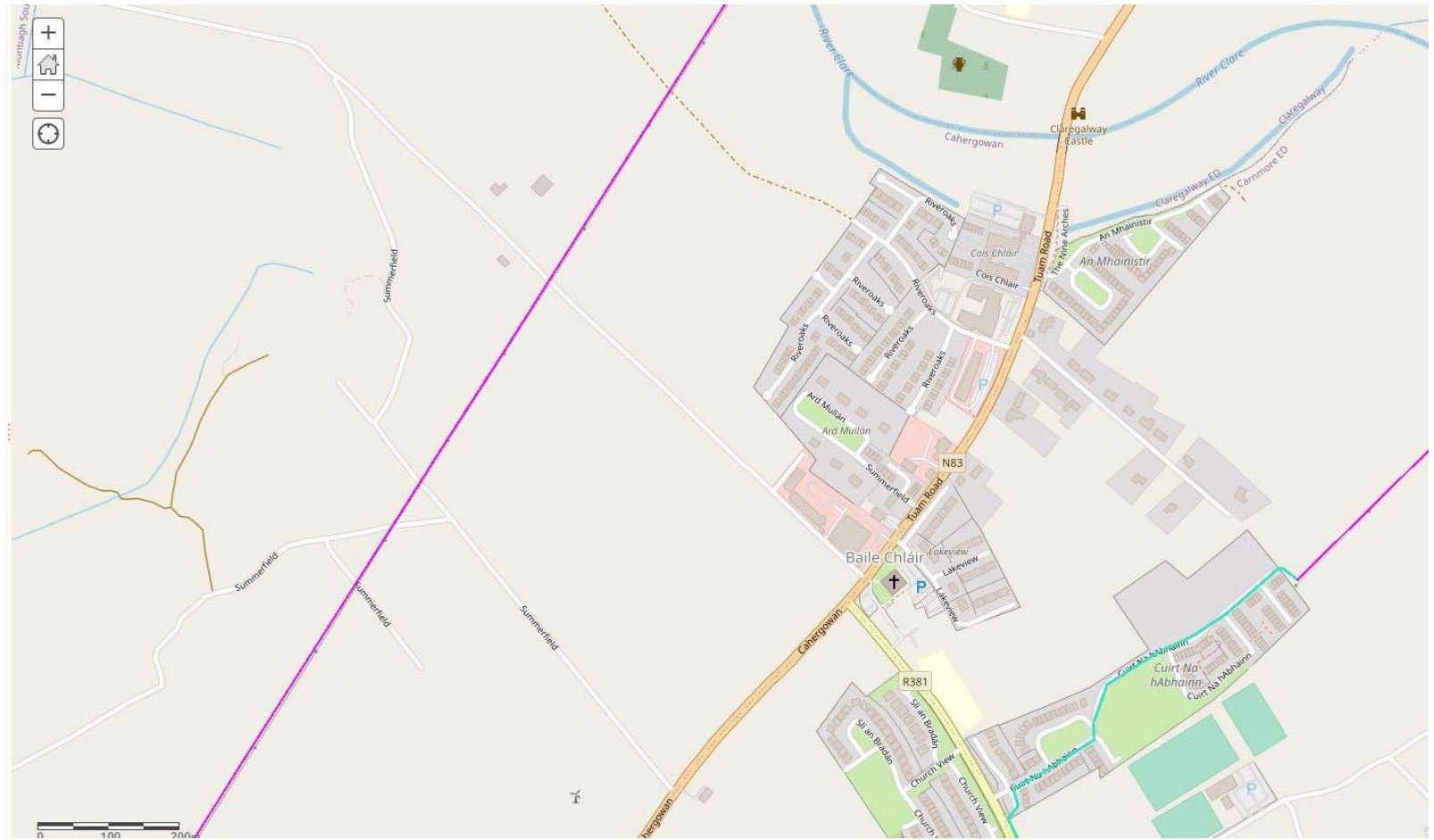
Legend

ESB Networks

ESB HV Lines

— HV Underground

— HV Overhead



MAP C

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Legend

ESB Networks

ESB HV Lines

- HV Underground
- HV Overhead

ESB MV/LV Lines

- MV Overhead Three Phase
- MV Overhead Single Phase
- LV Overhead Three Phase
- LV Overhead Single Phase
- MVLV Underground Three Phase
- MVLV Underground Single Phase

This map shows the Greg Lodge area. A prominent orange line representing a high-voltage (HV) overhead line runs diagonally from the top-left towards the bottom-right. To its left, a white line represents a low-voltage (LV) overhead line. A blue dashed line indicates a medium-voltage (MV) underground line. The map includes a legend on the left, navigation controls (zoom in, zoom out, home, refresh) in the top-left, and a scale bar (0-60m) in the bottom-left. Labels on the map include 'Greg Lodge', 'St. Ann's Parish', and 'St. Ann's Church'.



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Legend

ESB Networks

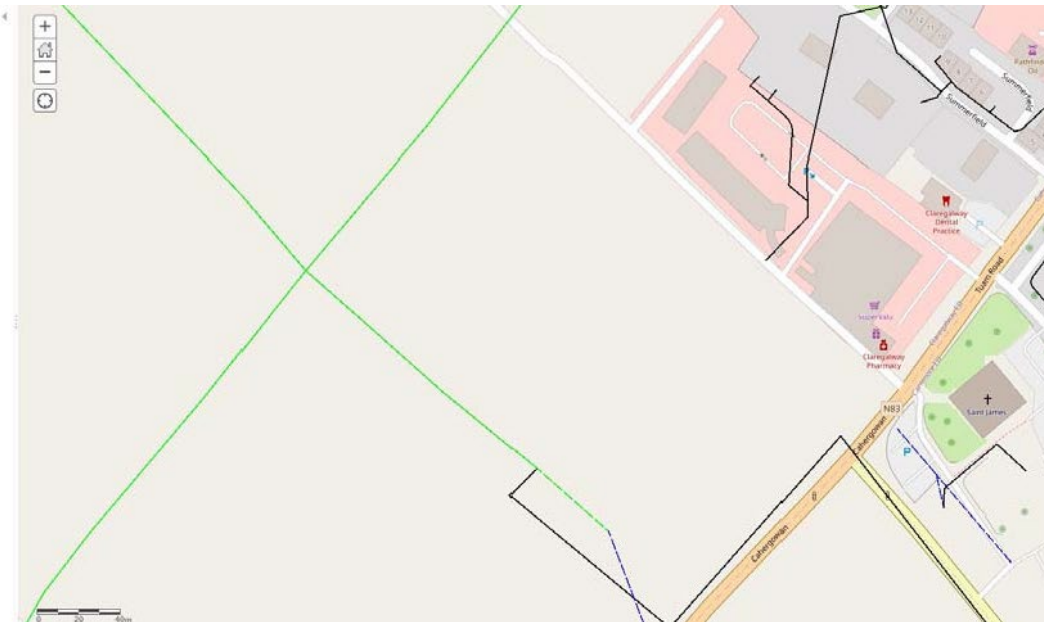
ESB HV Lines

- HV Underground
- HV Overhead

ESB MV/LV Lines

- MV Overhead Three Phase
- MV Overhead Single Phase
- LV Overhead Three Phase
- LV Overhead Single Phase
- MVLV Underground Three Phase
- MVLV Underground Single Phase

This map shows the St. James area. A prominent orange line representing a high-voltage (HV) overhead line runs diagonally from the top-left towards the bottom-right. To its left, a white line represents a low-voltage (LV) overhead line. A blue dashed line indicates a medium-voltage (MV) underground line. The map includes a legend on the left, navigation controls (zoom in, zoom out, home, refresh) in the top-left, and a scale bar (0-60m) in the bottom-left. Labels on the map include 'St. James', 'St. James Church', 'Claremorris Dental Practice', and 'Claremorris Pharmacy'.



MAP D

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BordGaisNetworks

High Pressure Gasline Annotation

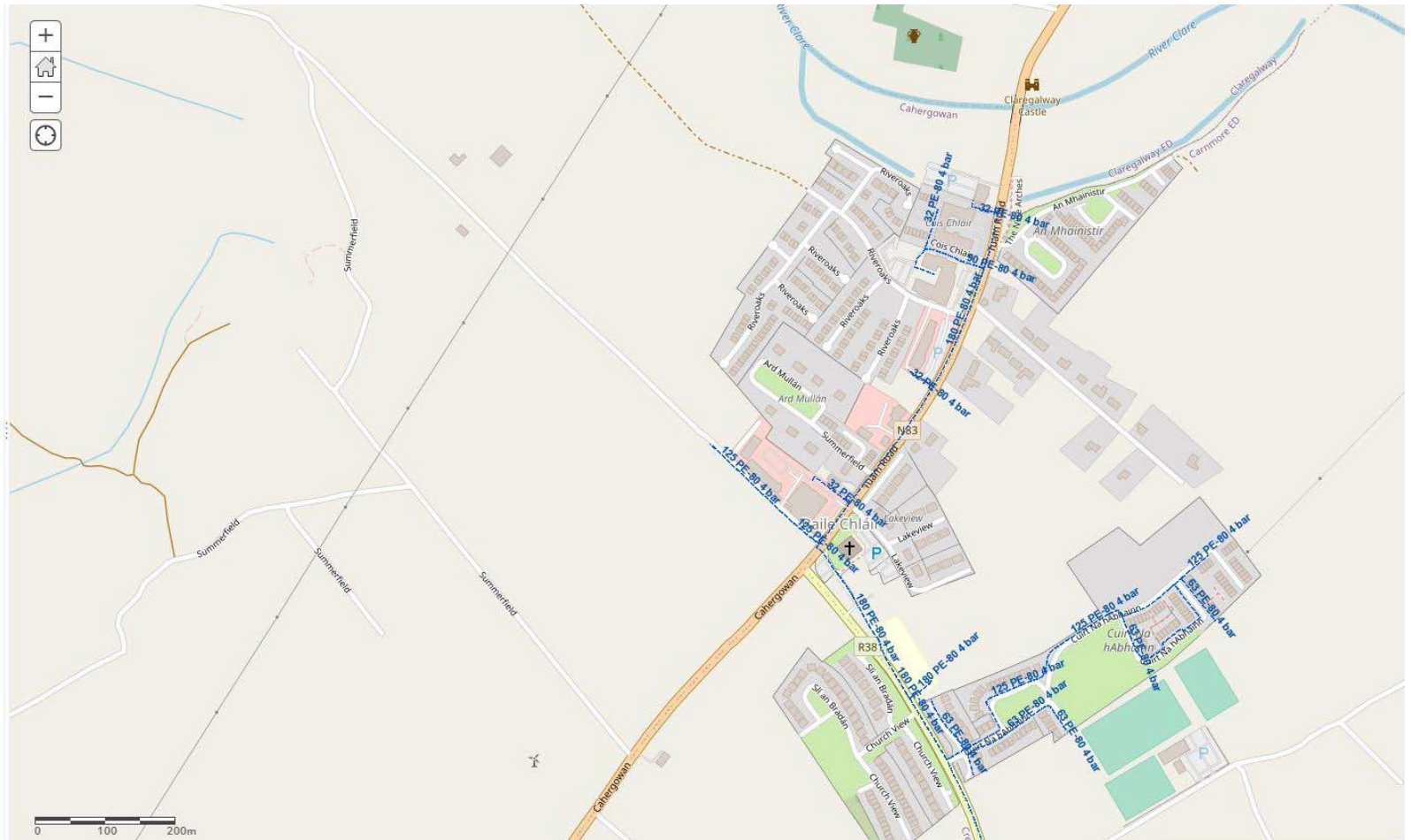
Transmission High Pressure Gasline

Medium Pressure Gasline Annotation

Distribution Medium Pressure Gasline

Low Pressure Gasline Annotation

Distribution Low Pressure Gasline



MAP E