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CDP Review,
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Áras an Chontae,
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10th September 2020

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

A Chara,

I have been instructed by my clients **Truskey West (Property Holdings) Ltd**, to prepare a submission in relation to the forthcoming “*Core Strategy*” and “*Bearna 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 “Bearna” to accommodate MASP growth targets and higher density residential development**

1.0 Location & Context

Presently, the settlement of Bearna can be described as a “Key Town” at the edge of Galway City. However, this area is earmarked for strategic growth purposes. In particular, it is located and 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 Bearna within the MASP boundary.

The role of Galway MASP and the location of Bearna within this area is reinforced in the 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.”

The existing Core Strategy has the potential to constrain development and the delivery of targeted population growth in Bearna, in conflict with the RSES/MASP. For example, the current Core Strategy is currently preventing the consideration of lands for owned by my client for residential development, as these are currently reserved for longer term future development. In this regard, we refer to lands (0.59hectares) owned by my client, which are located directly to the north of Pl. Ref. No. 19/1983¹, and are situated c.345m to the north of Bearna village centre/Twelve Hotel. These subject lands can be described as an undeveloped infill inner suburban site.

In this regard, the requested increase in the Core Strategy population would potentially enable the identification of suitable lands for development within the Settlement, in the interest of consolidated and sequential urban development.

2.0 Strategic Planning Context

Bearna 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 updated “*Bearna Plan*” will acknowledge the strategic importance of this settlement within the Metropolitan area of Galway City, as well as the potential for the lands within Bearna cater for sustainable residential development in this context during the forthcoming plan period.

All relevant planning policy documents and statutory plans for the area, identify the strategic importance of Bearna,.

- Bearna has a number of locational advantages to cater for future residential development
- Under the provisions of the recently adopted RSES, the settlement of Bearna is located with the MASP (Metropolitan Area Strategic Plan), where residential growth is specifically targeted.
- A strong core strategy population allocation, and the identification of underutilised infill lands for development, would enable sequential urban development in line with the strategic aims of the County Development Plan and the aims of the current “Bearna Plan”
- An appropriate increase in the population allocation for Bearna would form an appropriate response to the recent High Court Judgement (Case Ref. 2019 20 JR)

These points are discussed in more detail in the grounds of submission below.

3.0 Grounds of Submission

This submission essentially requests the Council to;

- (1) **Ensure there is a sufficient increase in the Core Strategy population for “Bearna” 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 Bearna are discussed below.

¹ Pl. Ref. No. 19/1983 is currently under consideration by An Bord Pleanala (Case Ref. ABP-308037)

3.1 Locational Advantages of Bearna

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

- Its close proximity to Galway City, and location within the Galway Metropolitan area
- Its scenic and coastal setting
- Its location along the “Wild Atlantic Way”, at the gateway to South Connemara and the Galway Gaeltacht
- Its vibrant commercial core
- The presence of a public sewerage network and public mains
- Existing and future accessibility, which will benefit from the future interchange for the Galway City Ring Road (See Figure 4 below)

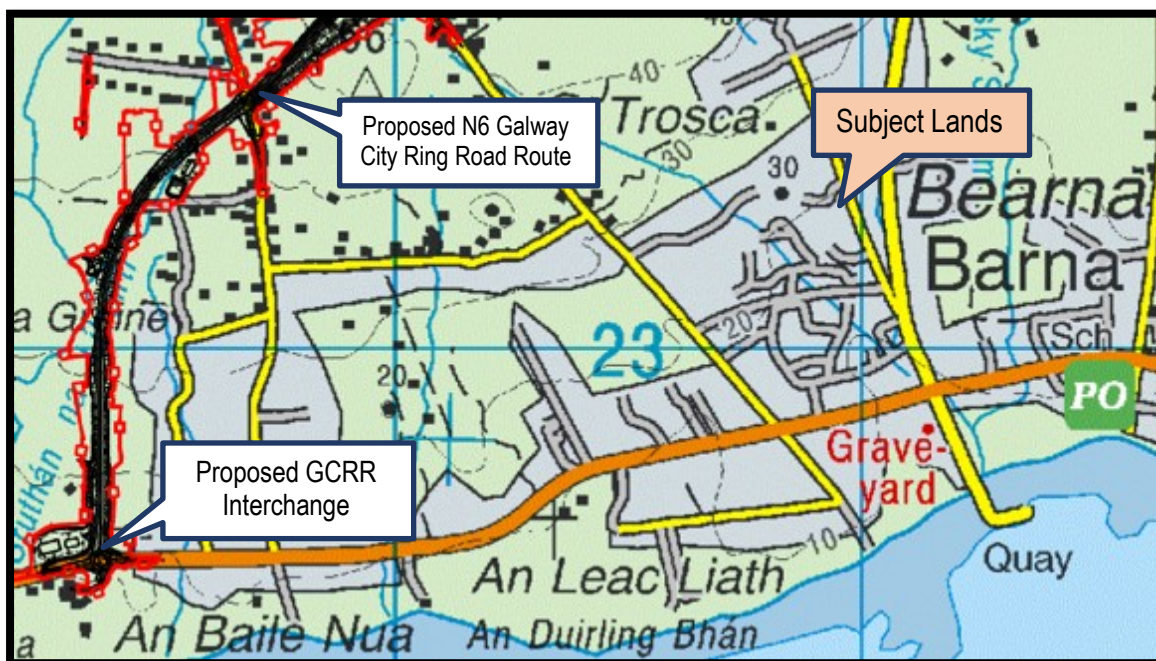


Figure 4: Extract from “Overall Location Plan” of Galway City Ring Road (GCRR) project, showing location of subject lands within the urban cordon, and wider accessibility of the area.

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

3.2 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 settlement of Bearna 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>Bearna is located within the MASP growth area. As such, the settlement the capacity to meet the housing demands based on population targets outlined in the RSES. As such a higher population allocation within the Bearna 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 Bearna). 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 Bearna area is warranted. Furthermore, the consideration of suitable lands in Bearna 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>Owing to Bearna’s location within the MASP area, the requested increase to the population allocation for the Bearna 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 ... Baile Chláir, Bearna, Oranmore, Briarhill.”</i></p>	<p>This section of the RSES specifically identifies Bearna 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 Bearna’s location within the MASP boundary, 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</i></p>	<p>Owing to Bearna’s location within the MASP area, the consideration of suitable lands for higher density residential development will</p>

	<i>transport patterns. This provides for a co-ordinated approach with investment and the delivery of essential infrastructure, services and community facilities.”</i>	deliver efficient and sustainable integrated land use and transportation benefits, in accordance with the vision outlined in the RSES.
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, with the potential to cater for higher residential development, will contribute towards the ultimate delivery of the population targets with the MASP.

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 summary, Bearnna is strategically located within the MASP. Accordingly, a higher population allocation for the Bearnna Plan 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.

3.3 Compliance with strategic aims of current County Development Plan

It is noted that the current County Development Plan (CDP) acknowledges the strategic growth potential of Bearnna. In particular, we refer to “Settlement Strategy Objective” SS1 of the CDP. This objective entitled “Galway Metropolitan Area” states that “Galway County Council shall support the important role of Galway City and the Galway Metropolitan Area (which includes the City area and the Electoral Divisions of Oranmore, **Bearnna**, Galway Rural and Ballintemple which are inextricably linked to and function as part of a greater Galway City), as key drivers of social and economic growth in the County and in the wider Western Region and will support the sustainable growth of the strategic settlements, including the future development of Ardaun and Garraun, within the Galway Metropolitan Area.”

Therefore, the existing CDP stipulates that it “shall” support the sustainable growth of the strategic settlement of Bearnna within the Galway Metropolitan area.

In addition, Section 12 of the current CDP identifies a number of strategic aims for the development of the County. In particular, we refer to “Strategic Aim 4 – Balanced Urban and Rural Areas”. This sets out to “**Prioritise development within the Hub town of Tuam, the Galway Metropolitan Area, the key towns and smaller towns, villages and settlements within the County, while supporting the role of the rural areas in sustaining the rural based economy. In parallel, one of the key “performance indicators” of this strategic aim is the “Number of new houses provided”.**

A suitable population allocation for the Bearnna Plan area, would assist in the delivery of sustainable residential densities at this location, in accordance with National Planning Policy and the aims of the Development Plan.

Finally, the consideration of suitable lands for residential development purposes at this location, would be compliant with the principles of “Sequential Development” as set out in the existing “Bearnna Plan”. In particular, section 1.4.2 of the existing Bearnna Plan states that “*The preferred development option promotes the sequential development of the remainder of the village centre in Bearnna, from the centre outwards. New development, in particular housing, should be delivered on under-utilised, infill and/or brownfield sites, including the redevelopment of existing sites and buildings, to build-up the existing development envelope of the urban area and to ensure that serviced lands close to the centre and public transport options are the primary focus for development in the short to medium term.*” Accordingly, the designation of the suitable lands for sustainable residential development within the forthcoming plan period, at “under-utilised”, “infill” lands within the existing “envelope of the urban area”,

together with the serviceability of the subject lands and the proximity to public transport, would be consistent with national planning policy as well as the aims of the existing Bearna Plan.

In summary, the availability of strategically located, development lands within an infill and inner suburban footprint, which can connect to available infrastructural services, is a finite resource within the County. The requested increase in the population allocation for Bearna in line with MASP growth targets, would enable the village to grow sequentially out from the village core.

3.4 Response to recent High Court Judgement

The need for the new County Development Plan to specify a sufficient and clearly defined population allocation for Bearna (consistent with its Metropolitan area status) was highlighted in a recent High Court Judgement. In this regard we refer to Heather Hill Management Company clg & anor. -v- An Bord Pleanála & anor (Case Ref. 2019 20 JR). In the latter High Court judgement, An Bord Pleanála's decision to grant permission for an SHD application for 197 no. houses² was set aside because *"the scale of the proposed development would breach the population allocation for Bearna as set out in the core strategy and settlement hierarchy, and as recently affirmed by a variation made to the County Development Plan on 23 July 2018."*

This legal decision reinforces the need for a higher population allocation for Bearna to be specified as part of the new Core Strategy for the County. Accordingly, it is essential that the population allocation for Bearna is mindful of the settlements designated strategic role to cater for residential growth with the Galway Metropolitan area, and the need to deliver sustainable higher densities. Furthermore, a higher population allocation as part of the forthcoming Core Strategy would enable Bearna to cater for additional higher density residential development during the Plan period 2022-2028.

3.5 Context of Neighbouring Planning Application

There is no planning history on the subject lands. However, a planning application for 40 no. residential units is currently being assessed on the lands directly to the south (See Pl. Ref. No. 19/1983 & An Bord Pleanála Ref ABP-308037 refers). This is located on lands also owned by my clients. The development description for the latter application is outlined below;

"the construction of a housing development comprising of 40 no. residential units (i.e. 22 no. houses and 18 no. apartments) at Truskey West, Bearna, Co. Galway. The development will consist of:

- 2 no. House type "B" – 3 bed two storey semi-detached houses
- 8 no. House type "C" – 4 bed two storey semi-detached houses
- 2 no. House type "C1" - 4 bed two storey semi-detached houses
- 6 no. House Type "D" – 3 bed, two storey terraced houses
- 4 no. House Type "D1"- 3 bed, two storey terraced houses

The 18 no. apartments are proposed within a single two and a half storey building block. This will accommodate 8 no. 1 bed apartments, 9 no. 2 bed apartments and 1 no. 3 bed apartment.

The proposed development includes;

- *The construction of a section of the "Bearna Inner Relief Road" previously permitted under Part 8 Planning Reference No. LA2706. This new section of roadway (link road) will connect the L-13215-0*

²This legal case refers to a Strategic Housing Development proposal for the construction of 197 no. houses at Truskey East, Bearna (An Bord Pleanála Case Ref. No.302216).

County road and the L-1321-58 County road, with the provision of a new priority junction with the L-1321-58, to serve the area.

- The permanent closure of a section of the L-13215-0 County road to vehicular traffic, and provision for this section of the road to be used as a pedestrian and cyclist route.
- The construction of a new access junction off the proposed new link road to serve the proposed housing development.
- Connection to public mains water infrastructure, including connection to existing surface water and foul drainage networks, to serve the development,
- Provision of public open space, a playground, private open space, a surface level car parking, bicycle parking, bin store, footpaths, public lighting, landscaping with reuse of ruins of agricultural stone shed, revised boundary treatments, together with site works and services associated with the proposed development.

A Natura Impact Statement will be submitted to the planning authority with the application.”

The latter application includes a “Master Plan” layout to show how access and residential development could be accommodated in the area.

Furthermore, the latter application, if permitted, would result in an enhancement to the local road network. In particular, that latter application proposes to construct a section of the “Part 8” Inner Relief Road, known as the “Link road”, which would form a vital piece of benefitting roads infrastructure for the area.

Therefore, an adequate increase in the population allocation for Bearna, in line with its MASP designation, would potentially enable the delivery of sustainable residential development on suitable lands, in areas where there are proposals in place for additional residential development and road network improvements.


3.6 Absence of Environmental, Natural or Built Heritage Constraints

It is envisaged that the requested higher population allocation for Bearna, 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,
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