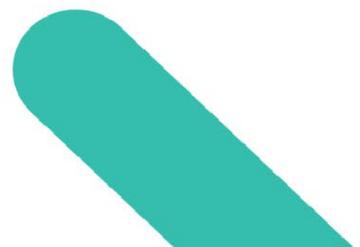
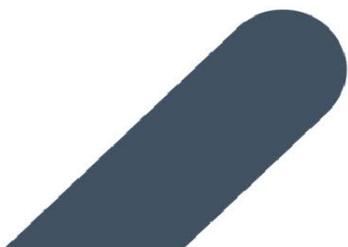


## **County Development Plan Submissions**

Submissions to Galway County  
Council Pre-Draft County  
Development Plan





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# Table of Contents

1.	<b>INTRODUCTION .....</b>	<b>2</b>
2.	<b>BRIARHILL CONTEXT .....</b>	<b>3</b>
3.	<b>RELEVANT OVERARCHING PLANNING POLICY .....</b>	<b>4</b>
3.1	National Planning Framework.....	4
3.2	Regional Spatial and Economic Strategy .....	5
3.3	Galway County Council Issues Paper (Stage 1).....	6
3.3.1	Core Strategy and Housing.....	6
3.3.2	Urban living and Placemaking .....	7
3.3.3	Economic, Enterprise, Tourism and Retail Development.....	8
3.3.4	Infrastructure and Transport .....	8
4.	<b>CONCLUSION .....</b>	<b>10</b>

## 1. INTRODUCTION

MKO, have been engaged by a number of landowners in the Briarhill area to make a submission on the Stage One (Pre-Draft) of the Galway County Council Development Plan 2022 – 2028 preparation process.

The Council set out that there are a number of key challenges to be faced in order to produce a suitable County Development Plan for the coming 6 year period from 2022 to 2028. These challenges include:

- Growing the metropolitan area and other settlements within the County to achieve Compact Growth.
- Reducing our carbon footprint and achieving the national target of zero emissions by 2050
- Living sustainably without compromising future generations.
- Providing sufficient physical and social infrastructure to support economic development and to enhance our quality of life.
- Building on the provision of high-quality employment and economic opportunities at appropriate and sustainable locations.

These challenges can be met by producing an ambitious plan focused on sustainable development with emphasis on appropriate densities and building heights, new housing numbers and additional commercial floorspace in appropriate locations within the County.

The purpose of this submission is to identify the suitability of land for development in Briarhill, acknowledge and support the Council's intention to prepare a development framework plan for Briarhill and to ensure the emerging Plan provides a strong yet flexible planning framework for future growth in the context of Briarhill.

2.

## BRIARHILL CONTEXT

The area of Briarhill, is located at the junction of the N6 dual-carriageway and the Regional Galway to Monivea Road (R339) to the south and the junction of the N63-264 and within proximity to the proposed N6 Galway City Ring Road. The general area is within the confines of County Galway and borders the administrative boundary of Galway City. Briarhill is located on the Eastern Environs of Metropolitan Galway.

The area is highly accessible, with excellent road linkages, being close to the proposed N6 Galway City Ring Road, the M6 motorway, and located on a regular bus route, with 4 no. bus stops along Parkmore Road to the west of some of the lands, as well as two stops to the south, on the R339. The development of this area would provide a much-needed strategic future growth area on the eastern periphery of Galway City.

Strategically Briarhill is located adjacent to the largest employment source in the west of Ireland, Parkmore.

### 3. RELEVANT OVERARCHING PLANNING POLICY

In terms of National and Regional overarching Planning Policy, the following should be considered in the preparation of the new Development Plan.

#### 3.1 National Planning Framework

The National Planning Framework (NPF) entitled 'Project Ireland 2040', is the Government's high-level strategic plan for shaping the future growth and development of Ireland up to 2040, stating in chapter 1.1 that "by 2040 there will be roughly an extra one million people living in our country", which will mean "hundreds of thousands of new jobs and new homes" will be required, and the County of Galway will be required to provide for a relative proportion of these new jobs and homes.

The NPF states that the first National Strategic Outcome (NSO) is Compact Growth. This outcome sets out that 40% of future housing development will be targeted within and close to the existing 'footprint' of built-up areas, and better use will be made of under-utilised and infill land with higher density schemes that are better served by public transport.

Other NSOs include A Strong Economy Supported by Enterprise, Innovation and Skills (NSO5), which states that "A Strong Economy Supported by Enterprise, Innovation and Skills ... will depend on creating places that can foster enterprise and innovation and attract investment and talent. It can be achieved by building regional economic drivers" and "Delivering this outcome will require the coordination of growth and place making with investment in world class infrastructure, including digital connectivity, and in skills and talent to support economic competitiveness and enterprise growth".

Relevant National Policy Objectives (NPOs) include:

##### NPO 3a

"Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements".

##### NPO 11

"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".

##### NPO 33

"Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location".

It will be important for the future of Galway as a whole to ensure that these National Strategic Outcomes and Policy Objectives will be at the forefront of the evolution of policies and objectives of the new plan.

## Regional Spatial and Economic Strategy

The Regional Spatial and Economic Strategy (RSES) for the Northern and Western Regional Assembly (NWRA) was published on 24<sup>th</sup> January 2020.

The first Growth Ambition discussed in the RSES is 'People and Places', which sets out that:

*"Compact growth will be pursued to ensure sustainable growth of more compact urban and rural settlements, supported by jobs, houses, services and amenities, rather than continued sprawl and unplanned, uneconomic growth".*

The Galway Metropolitan Area Strategic Plan (MASP) provides a strategic focus on the city and its environs and sets out how it envisages the NPF will be implemented. Part of the County environs are located within this MASP area. Targets for the MASP include the growth of the population by 27,500 by 2026, and a further 14,500 to 2031, and deliver at least 50% of all new homes targeted to be within the MASP in the existing built-up area. The Strategy also aims to integrate new housing with sustainable transportation infrastructure.

RPO 3.9 sets out that it is an objective of the Council to *"Identify suitable development opportunities for regeneration and development that are supported by a quality site selection process that also addresses environmental constraints and opportunities"*.

The MASP states, in relation to population and housing within Strategic Growth Areas, *"a number of strategic locations have been identified that present the opportunity and capacity to deliver the necessary quantum of housing to facilitate targeted growth, subject to the adequate provision of services. These locations ..."* include *"Baile Chláir, Bearna, Oranmore and Briarhill"* (pg. 57).

In accordance with the Regional Spatial and Economic Strategy's objective, a specific policy on Galway County Council's intention to ensure the bringing forward of this RPO and the provisions of the MASP, particularly in relation to the Strategic Growth Areas, alongside Galway City Council where appropriate, should be included in the emerging County Development Plan.

### *The Galway Transport Strategy (GTS)*

The Galway Transport Strategy was produced in August 2016 to provide an *'Integrated Transport Management Programme'* for Galway City and its environs. The strategy sets out that there is a robust need to address the transport issues which face Galway and to establish a long-term strategy for transport within and around the city over a 20 year period as the current transport issues have put Galway's road network over capacity and are having a significant effect both on the quality of life of the residents of Galway, as well as on its future economy.

Section 1.1 of this strategy states that *"ultimately, the strategy will underpin the objectives of the current and future Galway City and Galway County Development Plans"* and we ask that this be at the forefront of consideration for location of development and the evolution of planning policy and objectives relating to sustainable transport and development.

The strategy highlights a number of issues Galway currently faces, which include over-reliance on private transport, congestion at peak hours, key junctions operating over capacity, connectivity issues across the county and the location of both housing and employment

destinations generating a large amount of cross-city & city bound travel, and limited road space on principle routes for bus and cycle lanes.

The following principles of the strategy should be considered in the preparation of the emerging plan:

- **Principle 1:** *“to promote and encourage sustainable transport, and in particular to make it convenient and attractive to walk, cycle or use public transport”.*
- **Principle 6:** *“to maintain and develop transport infrastructure and services to a high degree of quality and resilience”.*
- **Principle 7:** *“to adopt a ‘smarter technology’ approach to all transport interventions, whereby transport infrastructure and services are future-proofed”.*

We would support the inclusion of improved public transport facilities and principle aims of the Galway Transport Strategy to improve sustainable transport in the environs of the city and across the County as a whole. We would ask that policy provision and objectives for improved public transport links, in line with the transport strategy’s principles and strategic aims are included in the emerging plan.

It is noted in the strategy that the Ballybrit/Parkmore area is a destination area for commuters. We would support provisions for the continued sustainable development of areas within County Galway in the environs of the city where both residential and employment related development can be suitably and sustainably linked.

We would also support the inclusion of a policy objective which will ensure that the general proposals and aims set out in the Galway Transport Strategy will be incorporated into the County Development Plan to ensure sustainable transport provisions are integrated in a way which is in accordance with the overarching aims and assists future development in a sustainable manner.

### 3.3 Galway County Council Issues Paper (Stage 1)

A number of questions were asked of the public in terms of the Issues Paper for the County Development Plan, in order to help shape the plan for the future of those living and working in the County of Galway. The following comments and answers to questions asked in the Stage 1 plan are requested to be considered by the forward planning team in the preparation of the draft plan.

#### 3.3.1 Core Strategy and Housing

In terms of the Core Strategy and future housing needs of the County, the following should be considered in response to the questions asked.

- *How best can the County Development Plan cater for the projected population growth in the County over the lifetime of the plan?*

The development plan should take a positive but flexible approach to densities and compact growth in appropriate locations within or on the edge of towns and villages along with the City Environs, consistent with the overarching national and regional policy documents discussed above in this submission. The County Development Plan should be ambitious with

their targets and aim to work proactively with landowners/developers to provide logical and sustainable developments which benefit the future of Galway and its residents and visitors.

- *Where should the increase in population within the County be directed?*

In accordance with the National Policy Objective for Compact Growth, population increased should be focused in and surrounding built up areas in towns and villages and the Galway Metropolitan Area, where larger scale developments and mixed use developments can be suitably located, particularly in proximity to key employment areas such as Parkmore, in order to promote sustainable development and compact growth.

- *Development land is a limited valuable resource. How best do we maximise the development of appropriate land to create sustainable communities?*

Both site specific and general policies and objectives should be incorporated into the emerging plan to anchor development towards logical sites which have, or have the opportunity to have, good public transport, facilities, services, etc. close to them or the ability to achieve sustainable development and to provide development which is in accordance with national policy and the Galway Transport Strategy.

- *How can the plan best address increased residential densities?*

Residential development which is located in sustainable areas with sufficient infrastructure should be positively considered by the Local Authority where increased building heights and appropriate densities are proposed and reasonably justified. Compact Growth is at the forefront of the National Planning Framework, and as such, should be filtered down through policy to local levels through appropriately zoned lands in context of the wider area and the type of settlement.

### 3.3.2 Urban living and Placemaking

In relation to urban living and placemaking and the question of whether the Development Plan “*should facilitate a better mix of employment and housing in our urban places*”, the answer is yes.

There should be a well-integrated framework design/masterplan for mixed-use schemes and the location of light industrial and office development in close proximity to residential development with excellent pedestrian/cycle/bus links between which will help to relieve the need for private transport and therefore traffic congestion and pollution, and will be compliant with national and regional policy alongside being compliant with the provisions of the Galway Transport Strategy.

There should also be emphasis within policies and objectives in the emerging plan on the importance of ecological enhancement, ecological buffers and ecological connectivity within proposed developments and masterplans, along with enhanced pedestrian connectivity, the provision of home zones and details relating to the consideration of amenity and recreational land within proposed developments, in the interest of proper planning and sustainable development for the County as a whole.

The Local Planning Authority should also incorporate the 12 design principles, as detailed in the Urban Design Manual – A best practice guide (2009), in the drafting of the emerging development plan.

### 3.3.3 Economic, Enterprise, Tourism and Retail Development

Our answers to the questions asked in relation to economic, enterprise, tourism and retail development are noted as follows and should be considered in the preparation of the emerging County Development Plan.

- *How can the County Plan support inward investment and job creation in the County and where should it be directed?*

The emerging development plan should include explicit provision for increased levels of economic/commercial/industrial/retail floor space to be brought to the County within the plan period.

The development plan should include a policy objective to positively consider new developments that are high quality and attractive to companies, particularly those that are in suitable locations – close to/within towns and villages and the city environs, which are capable of handling the additional employment and development.

- *How can the Plan policies help integrate enterprise land uses with other uses such as residential, transportation and tourism, etc?*

The National Policy Objective of Compact Growth, the open consideration of new development locations and an enhanced focus on providing sustainable transport links and creating sustainable places should be a focus of the emerging County Development Plan. Sites proposed for residential and, or, commercially focussed developments should be considered favourably, particularly where they are well integrated with the surrounding area and will assist in the reduction of the need for the private car in both daily commutes for residents and workers along with tourists in the area.

The Local Authority should also consider setting out key locations and policy objectives where larger scale enterprise developments would have the opportunity to integrate with residential development, and vice versa.

### 3.3.4 Infrastructure and Transport

In terms of transport and infrastructure, the questions set out in the issues paper are addressed below and should be considered by the Local Authority in the preparation of the next stage of the County Development Plan.

- *How can the County Development Plan make sure that there is a better co-ordination between land use and transportation facilities in order to achieve more sustainable development?*

The County Development Plan can include targets and objectives to work closely with landowners/developers and ensure that the provisions of the Galway Transport Strategy are brought forward and implemented.

- *How can the plan best promote walking, cycling and the use of public transport?*

In accordance with the Galway Transport Strategy, the County Development plan should include targets to improve the public transport schemes and encourage pedestrian and cycle friendly developments while proactively working with developers to bring forward sustainable schemes in accordance with proper planning and sustainable development.

There is an opportunity for improved sustainable transport in the Briarhill area, in particular, which should be incorporated into the emerging framework plan. This area has the opportunity to have improved bus services and safe and attractive pedestrian routes throughout the area which include ecological enhancements to the area, making it an attractive place to live and work while discouraging the use of the private vehicle.

The consideration of viability in the planning process should also be incorporated into the emerging development plan, with the Local Planning Authority acknowledging that the viability of a scheme is paramount to its realisation.

4.

## CONCLUSION

As noted in the introduction section, it is our understanding that Galway County Council have sought to commission a design team to prepare a framework plan for the Briarhill area. We support this initiative and look forward to the opportunity to contribute to this framework, and to see it progress in the future.

We would also respectfully request that the overarching policies and guidance at national and regional level are considered in the preparation of the new County Development Plan in the interests of proper planning and sustainable development.

In conclusion, it is respectfully requested that Galway County Council consider the above issues in their preparation of the Draft Development Plan to ensure the emerging Plan provides a strong yet flexible planning framework for the future growth of the Briarhill area. As part of this process, it is considered that engagement with the landowners/ developers is critical to ensure a fit for purpose Plan exists going forward. Our Clients welcome the opportunity to be involved in the shaping of policies for Briarhill which will in turn shape new developments in the area.

Should the Planning Authority require further clarification or information on any matter raised in this consultation response, please do not hesitate to get in touch.

