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### Ireland 2040 Our Plan- Galway County Council Submission

A Chara,

Galway County Council welcomes the publication of the Draft National Planning Framework (NPF). As part of the review of the Draft NPF, a presentation was given to the Elected Members at their plenary Council Meeting on the 23rd of October 2017. The Elected Members raised a number of points that they specifically requested would be included in the Council's submission on the Draft NPF. These are contained within the text of the submission which follows.

In March 2017, Galway County Council made a submission for inclusion in the Draft National Planning Framework. Following a review of the Draft NPF, the Council welcomes the broad parameters set out in the new spatial planning document to achieve balanced regional development. In particular, the inclusion of a number of key strategic projects for the future development of Galway City and County Galway, namely the N6 Galway City Ring Road, the development of the Galway Airport site and the Galway East Main Drainage Waste Treatment Plant. As the National Planning Framework is intended to be closely aligned with the Capital Investment Plan (CIP), it would be presumed that these projects will be given a definitive timeframe of delivery when the CIP is published.

Galway County Council would like to highlight and raise concern regarding a number of inconsistencies with the population breakdown between urban and rural within the NPF. In certain sections of the plan there is reference to a 70/30 percent breakdown and in other parts it is 50/50% breakdown, these figures will have a direct impact on the future development of the county. There are also concerns regarding the percentage levels that have been identified for development in different settlement sizes, varying figures which are used within the document will lead to confusion. In addition, the Regional Spatial and Economic Strategy (RSES) will be tasked to allocate these rural and urban population figures without definitive guidance from the NPF.

The Council requires clarity on the wording of National Policy Objective 2b of the Draft NPF, wherein it states that 'at least half (50%) of future population and jobs growth will be focussed on the five cities and their immediately adjoining suburbs'. Clarification is required on the meaning of "immediately adjoining suburbs' in said policy objective. The Galway County Development Plan, 2015-2021, and associated settlement strategy, identifies areas surrounding Galway City, as forming part of the Metropolitan Area, as originally defined by the National Spatial Strategy.

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While Galway County Council acknowledge the inclusion of "Metropolitan Area" in Section 3.3 of the Draft NPF, it is felt that the concept/term should feature more prominently within the Policy Objectives, reflecting the importance of the immediate surrounding areas which form part of, and support the City Region. The Galway Metropolitan Area is defined as; Galway City, identified Gateways of Oranmore and Bearna (thriving satellite settlements within their associated hinterlands) and Ardaun; a future growth area to the immediate east of Galway City, these areas merit inclusion within the definition of the Metropolitan area. The employment centres of the Metropolitan Area of Galway extend far beyond the city boundary. Significant employers serving Galway City and County are located within the functional area of Galway County Council's Metropolitan Area, including large public services and industrial organisations, who attract employees from the network of satellite towns surrounding the city. These satellite settlements are inextricably linked to, and function as part of, the greater Galway City area.

In addition, the Council would raise concerns regarding the ambiguity surrounding the wording of National Policy Objective 2b with respect to the meaning of "large regionally distributed town and their environs, which are to be identified through the Regional Spatial and Economic Strategy (RSES) process. Clarification on the intended meaning of this section of the policy objective would be welcomed.

The Council requests the inclusion of key strategic sites in our county towns. For example, the HSE site at St. Brigid's Hospital in Ballinasloe represents a significant resource for economic, educational and recreational development, which should be re-utilised/redevelopment.

Galway County Council welcomes the concept of reducing urban sprawl and increasing the liveability of urban places, as set out in Section 2.5 (Should We Build Compact or Sprawling Urban Areas) of the Draft NPF. However, concerns were expressed by elected members regarding the National Policy Objective 3a, wherein it is anticipated that at least 40% of all new homes nationally will be delivered within the built-up envelope of existing urban settlements. Achieving this ambiguous figure may prove to be problematic within County Galway due to limited capacity for development in our key towns because of infrastructural constraints, and as a result would have a negative impact of the future growth of County Galway towns. Therefore, the delivery of housing identified in objective 3b could have an adverse impact on the county and our associated key settlements.

The Council also welcomes that the Draft NPF recognises the structural weakness currently present in the North Western Regional Assembly Area and the level of growth and employment in this region. However, the potential for growth of towns within the county based on the parameters that have been identified in the Draft NPF causes concern. The concern relates to the growth target set for towns over 10,000 population which have been identified for 40% uplift in Section 3.3 of the Draft NPF. All key towns within County Galway (Athenry, Bearna, Loughrea, Oranmore), as well

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as County Hub Town Tuam, and the County town of Ballinasloe are below the 10,000 population threshold. Tuam has a number of key services, sufficient residential land, infrastructure, and an existing employment base, however it is regarded within the current draft NPF as "rural" because the population of the town is less than 10,000 people, this definition could restrict the growth of this hub town. Therefore, this again demonstrates the County is clearly at a disadvantage based upon the 15% uplift identified for towns with a population less than 10,000. In order for the County to grow and relieve some of the development pressures of the city and its immediate area, towns where significant infrastructure projects have been implemented, need to be identified for substantial growth.

In Section 4 (Planning For Diverse Rural Places) of the Draft NPF, Galway County Council supports the commitment to strengthen the rural areas of the country; however it is unclear how this will be achieved in relation to National Policy Objective 14, which forecasts a targeted growth of the rural area limited to 15%, this growth figure is applicable for all of the settlements within the County. It is considered that the definition of "rural" within the NPF which includes towns and villages up to a population of 10,000 people is adversely restrictive and will have a negative impact on County Galway.

Section 4.3 of the document provides a distinction between rural areas located within the commuter catchment of the five cities regions, larger towns and those that are outside commuter catchments. While the acknowledged distinction between differing 'rural areas' is welcomed, it is unclear as to how this premise is reflected in National Policy Objectives. Furthermore, as stated previously, in the case of County Galway, the definition of large towns (i.e. population of 10,000) would exclude all key towns as they fall below the stated population threshold, yet many of these settlements have excellent transportation links (motorway, train line) to Galway City and represent strategic sustainable future development locations. There are well established residential settlements, successful industry and business based within County Galway's rural towns e.g. Athenry and Oranmore, these settlements should be encouraged to grow to an appropriate scale reflective of their status within the County and not restricted unfairly through the NPF.

The preceding narrative to National Policy Objective 18b, refers to housing within open countryside, it makes reference to "<u>functional need</u>" however, the objective wording refers to a "demonstrable <u>economic need</u> to live in a rural area." The NPF does not provide any clear definition or explanation as to what constitutes an "economic need" and whether the policy requires applicants to demonstrate a functional or economic need or a functional and economic need. In order to effectively manage development within 'rural areas' the NPF needs to be consistent in its approach as well as in its objectives.

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Galway County Council supports the development of the towns and villages, as stated previously, the growth of the towns in the County by 15% compared to 40% in areas above 10,000 population, in conjunction with the apparent further restriction to live in the rural area, based solely on "demonstrable economic/functional need", unfairly restricts growth across the entire administrative boundary of the County. It is suggested the wording of policy objective 18b should be amended to allow the consideration social and community criteria when determining rural housing in areas under strong urban influence on justifiable need to reside in these areas.

National Policy Objective 19, requires additional clarity with regards to whether the Housing Need Demand Assessment tool is intended to be developed for single rural housing or is envisioned to represent an assessment of housing need throughout the County and if so, what parameters will be involved.

With regards to the paragraph on Agriculture in Section 4.6 (Planning and Investment to Support Job Creation), wherein reference is made to the avoidance of competition between various land use options and the potential requirement for tailored land management policies, it is considered that a land management Objective is required to be set out in the finalised National Planning Framework to avoid such competition in this important sector.

In Section 5 (People Homes and Community), Galway County Council seeks clarification on the Hierarchy of Settlements and Related Infrastructure diagram (pg 77). It is unclear whether the prescriptive uses which appear within the diagram are determining factors in the growth of settlements, establishing restrictive parameters for the future growth of towns and villages.

In addition there is concern that the diagram is sourced form an out of date publication from the North of Ireland which requires updating.

National Policy Objective 29 states that specific projections for ageing population will be required in future plan-making, it is unclear if this is to form part of the core strategy population allocation or a separate body of work in terms of meeting the needs of older persons.

Section 5.5 deals with Gaeltacht areas, the Council does not believe that this section gives sufficient recognition or guidance as to the preparation and implementation of future planning policies and objectives in relation to designated cultural areas within the country. The narrative as well as objective 31 do not sufficiently demonstrate the importance of the preservation of the Irish language or the sustainable development of the Gaeltacht areas including their intrinsic importance as a National cultural asset.

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# Comhairle Chontae na Gaillimhe Galway County Council

Section 6 (Realising our Island and Marine Potential) of the document, Galway County Council notes the Policy Objectives contained therein. Galway County Council would request that a more detailed section on the Marine industry at the potential therein especially to coastal counties such as Galway would be recognised in the document. The omission within the narrative of Ros an Mhil port and Galway Port should be reconsidered, as these are prime facilities in the City and County, respectively, which have huge potential for growth located adjacent to our large marine spatial area in the Atlantic Ocean. Furthermore, the Marine Section should acknowledge that the seaweed industry is a valuable maritime industry with potential for growth.

As Tourism plays a significant part to the economic success of the Country and the strong reliance that Galway has on the tourism industry, it is considered that a greater emphasis should have been placed on Tourism in the Draft NPF and the associated land uses. There is minimal information provided on Greenways or details for the provision of supporting infrastructure along the Wild Atlantic Way, which is a proven success along the western seaboard. The greenway in Mayo has illustrated the success that this outdoor pursuit can bring to the region, there are lengths of the Western Rail Corridor which could be identified as a potential greenway, which would open towns north of Galway City such as Tuam and Claremorris to the economic benefits if tourism. It is considered that there should be reference to the Dublin-Clifden greenway as this would be an important facility for the county and areas to the west of the city.

In relation to the National Policy Objective 67, the implementation of this objective requires further guidance and it may be the premise of this objective should be strengthen via Ministerial Guidelines/legislation.

Galway County Council has a number of strategic investment priorities which are essential to the future development of the County, these were clearly outlined within the original submission at pre-Draft stage. The Galway Transport Strategy (GTS) and specifically the N6 Galway City Ring Road as well as a commitment for investment in relation to the Galway Eastern Drainage Scheme, need to be clearly listed within the Capital Investment Plan (CIP). The County have appropriately zoned land for large scale development in our key towns and are primed for development. The Strategic Development Corridor with its location on both sides of the M6 Galway to Dublin motorway is in prime position to facilitate the economic expansion of the County.

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County Galway has demonstrated over the years that it is an attractive location offering a unique life style in a unique cultural and natural environment from the Connemara Mountains in the west, through the Gaeltacht areas to the Lakeland region of East Galway, the County continues to attract residents and visitors alike. With a cross-departmental commitment at National Government level for the delivery of key investment priorities, both City and County will build on their existing strengths and progress into the future emerging as a place where people will want to live, work, invest and visit into the future. We look forward to the final publication of the NPF and our viewpoint from above taken in consideration.

Alan Farrell

A/ Director of Services

Planning, Community, Enterprise and Economic Development.