

**Submission to the Galway  
County Development Plan  
2022-2028 (Stage 2)**

Lands at Forramoyle East,  
Bearna, Co. Galway





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1.

## EXECUTIVE SUMMARY

We note that Galway County Council are in the review process of the existing *Galway County Development Plan 2015-2021* and preparation of a new development plan for the period 2022-2028 is underway. On behalf of MSC Order, we wish to make a submission regarding Stage 2 (Draft) of the Galway County Development Plan 2022-2028 (hereinafter referred to as the Draft Plan) which was published on the 20th of May 2021 and will be on public display until the 30th of July 2021.

The purpose of this submission is to present a case for the rezoning of lands from ‘Residential Phase 2’ to ‘Residential Phase 1’. The zoning objectives for the subject site have not been changed between the extant plan and the draft plan, making the lands generally undevelopable for a period of 12 years. The priority of our clients is to reinstate the Phase 1 zoning and to request that the entirety of the lands are rezoned to Phase 1.

The results of the Justification Test (**Appendix 1**) clearly outline that the lands zoned for ‘Residential Phase 1’ under the Draft Plan are not representative of the land that should be available. A portion of the lands are already committed to development, and it should be considered that these lands are not included within the quantum of lands reserved for residential development during the period of the Draft Plan (2022-2028).

It is our understanding that the subject lands should be rezoned in their entirety to ‘Residential Phase 1’ based on the following:

- The lands are in a strategic location, only 600 metres west of the village centre,
- The lands extend to 2.44 hectares and have the capacity to significantly meet the housing targets for Bearna, as outlined in National, Regional, and Local plans,
- The proposed Inner Relief Road is located east of the subject lands, and development on the proposed site would benefit from this road. Therefore, our clients’ lands would positively meet **Policy BMSP 14 New Village Street**:  
*“Support the completion of the proposed new Village Street (Inner Relief Road) north of the existing R336 and prohibit any development that would affect the future construction of the approved route”.*
- There are no apparent constraints associated with the subject lands; there are no ecological designations on the site, no cultural or archaeological sites, no flood zones or recorded flood events, and no concerns with access.

## 2. INTRODUCTION

The subject lands are located in Forramoyle East, Bearna, Co. Galway. **Figure 1** below illustrates the location of the lands within the wider area, with **Figure 2** outlining the site boundary that the lands extend to.



Figure 1: Location of Subject Lands within Wider Context (Source: MyPlan.ie, Edited by MKO)

### 2.1 Site Location

The subject lands are located north of the R336 Regional Road and within the townland of Forramoyle East. The site is located approximately 600 metres from Bearna Village, and the village centre is located approximately 6.5km west of Galway City Centre. Bearna is located within the Metropolitan Area and is situated at the gateway of the Gaeltacht area.

### 2.2 Site Description

The R336 regional road is located directly to the south of the subject lands. The subject lands extend to approximately 2.44 hectares. Some green field sites border the land in question with several two storey detached properties located to the south of the site. The site is accessed by a narrow strip of land to the north. A detached two storey residential development is located to the immediate east of this access point. The proposed N6 Ring Road is proposed to be located to the north of the site with the proposed Bearna Inner Relief Road situated to the south.

The site is not prone to fluvial flooding and is not subject of any ecological designations. There are also no archaeological sites or national monuments on the site or in the immediate vicinity of the site. The subject site will not be affected by the proposed N6 Ring Road to the north of the proposed Bearna Inner Relief Road situated to the north.



Figure 2: Extent of Subject Lands (Source: MyPlan.ie, Edited by MKO)

## 2.3 Planning History

According to Galway County Council online planning portal there are no previous applications on the subject lands. However, there are a number of applications within the vicinity. These are outlined in **Appendix 2**.

## 2.4 Planning Policy

This submission has been prepared with cognisance to the following planning policy documents:

- National Planning Framework: Project Ireland 2040
- Regional Spatial & Economic Strategy for the Northern & Western Regional Assembly 2020-2032
- Galway County Development Plan 2015-2021
- Draft Galway County Development Plan 2022-2028

An overview of the relevant national, regional, and local policies and the way in which the proposed rezoning of the site to ‘Residential Phase 1’ would be supportive of these policies is outlined in **Appendix 3**.

3.

## SUBMISSION REQUESTS

The purpose of this submission is to present a case for the rezoning of lands from ‘Residential Phase 2’ to ‘Residential Phase 1’. The zoning objectives for the subject site have not been changed between the extant plan and the draft plan, making the lands generally undevelopable for a period of 12 years. The priority of our clients is to reinstate the Phase 1 zoning and to request that the entirety of the lands are rezoned to Phase 1. The results of the Justification Test (**Appendix 1**) clearly outline that the lands zoned for ‘Residential Phase 1’ under the Draft Plan are not representative of the land that should be available. A portion of the lands are already committed to development, and it should be considered that these lands are not included within the quantum of lands reserved for residential development during the period of the Draft Plan (2022-2028).

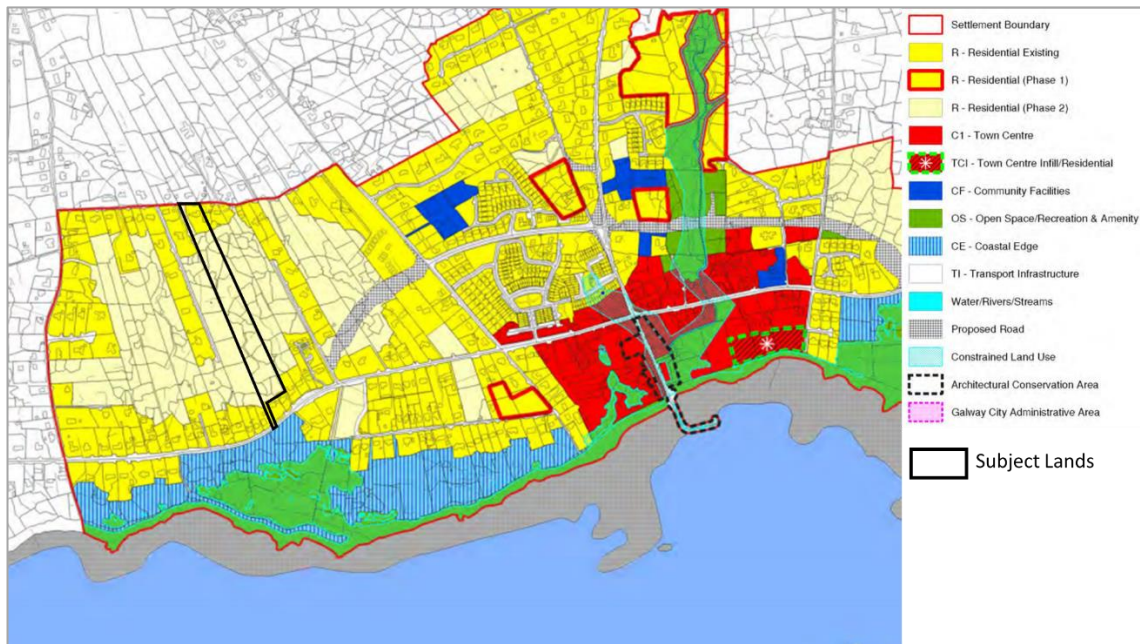


Figure 3: Draft Plan Bearna Land Use Zoning Map with the subject lands outlined in black (Edited by MKO)

Bearna as recognised in the Metropolitan Area is within a strategic location to Galway City. The Metropolitan Area has grown considerably in recent years and there is scope for the potential of planned future growth, the Draft Plan states that “Bearna and Baile Chláir have opportunity for delivering growth through consolidation”. This consolidation of existing settlements will promote growth of brownfill sites and which will enhance the settlement vitality. Our client’s lands that are west of the proposed Inner Relief Road can be considered as infill development as there is noticeable existing residential development within close proximity to the village centre. It is our understanding that the subject lands should be rezoned in their entirety to ‘Residential Phase 1’ based on the following:

- The lands are in a strategic location, only 600 metres west of the village centre,
- The lands extend to 2.44 hectares and have the capacity to significantly meet the housing targets for Bearna, as outlined in National, Regional, and Local plans,
- The proposed Inner Relief Road is located east of the subject lands, and development on the proposed site would benefit from this road. Therefore, our clients’ lands would positively meet **Policy BMSP 14 New Village Street**:  
*“Support the completion of the proposed new Village Street (Inner Relief Road) north of the existing R336 and prohibit any development that would affect the future construction of the approved route”.*
- There are no apparent constraints associated with the subject lands; there are no ecological designations on the site, no cultural or archaeological sites, no flood zones or recorded flood events, and no concerns with access.

Residential development would be meeting both National and Regional policy objectives and population growth targets as outlined in **Appendix 3**. The assessment of projected population growth targets indicated that there is a significant increase required in providing a variety of house types for a growing population, a figure that has since been challenged and is higher than initially anticipated.

It is the request of this submission that Galway County Council recognise the potential of these lands and the opportunity for growth in Bearna that can be provided.

## 3.1 Assessment

### 3.1.1 Projected Population Growth Targets

Under table 2.4 Projected Growth in Population and Settlement Structure, the population projection for Bearna for the lifetime of the plan is 750 (2022-2028), with the quantum of residential lands required outlined as 10.00 hectares. The Draft Plan also states that the settlement areas have been examined in the context of planning for compact growth to ensure alignment with the principles of the NPF and RSES.

Table 1: Draft Plan Projected Growth in Population and Settlement Structure

Settlement	Census 2016	Population Projection	Residential Units	Potential Residential units within Town Centres	Quantum of Residential Lands required(ha)
Baile Chlair	1248	975	390	117	13.00
Bearna	1998	750	300	90	10.00
Oranmore	4990	1540	616	184	20.53
Garraun	*	1258	503	*	14.38
Briarhill	*	977	391	*	13.03

The National Planning Framework (NPF) target predicts that Galway – City and Suburbs will grow between 40,000 and 48,000 between 2018 and 2040. Across this 22-year period, it is predicted that the city and its suburbs will grow anywhere between 1,818 and 2,181 per year. The provision of a population projection for Bearna of 750 for the lifetime of the Draft Plan (2022-2028) means that there is projected growth of 125 persons per year for Bearna during this 6-year period. Considering that Bearna, alongside Baile Chlair and Oranmore are well established and serviced locations within the Metropolitan Area, the population projection of 750 is considered low based on Galway City and Suburbs having a predicted growth rate in this 6-year period of anywhere between 10,908 and 13,086 persons. Bearna has the capacity, services, availability of lands, and the proximate location to Galway City Centre to justify the consideration of increasing the population projection of the population and settlement structure.

It has recently become evident within many Local Authorities in Ireland that the population allocations set out in the NPF have been underestimated, and that this will become a barrier to sustainable growth across the country. Emerging CSO data is beginning to indicate that Irelands population is set to exceed the projections of the NPF. Conall Mac Coille has stated:

*“The 2018 National Development Plan (NDP) envisaged facilitating development in regional hubs, reducing the reliance on Dublin and was predicated on the population rising to six million by 2040 - requiring 550,000 additional new homes (or 25,000 per annum) and 660,000 extra jobs. However, it is now clear the population has already grown beyond the demographic projections that underpinned the NDP”.*

It was stated in the Westmeath Examiner on July 8<sup>th</sup>, 2020, that

*“the indications currently are that population growth in the eastern and midland region is growing at a faster rate than projected in both the National Planning Framework [NPF] and the Regional Spatial and Economic Strategy [RSES].”*

A Report published by the National Investment Office – The Department of Public Expenditure and Reform ‘Assessing the alignment of the National Planning Framework and National Development Plan’ has carried out a high-level assessment of the population projections and housing needs as outlined in the NPF. The Rebuilding Ireland action plan set a target to reach a delivery of 25,000 homes per year in Ireland. With the impact of Covid-19 on these targets, a revised estimate for housing was developed in December 2020 which stated that the average housing supply will need to increase to an annual average of 33,000 per year.

### 3.1.2 Justification Test

Within the Draft Plan, there are 10 hectares of land zoned for ‘Residential Phase 1’. According to the RSES the approximate land area designated for “Land Capacity – Lands Available for Housing” in Bearna is 14 hectares. It is our understanding that based on revised housing targets, and the targets of the NPF for growth in Galway, the 10 hectares of land zoned for ‘Residential Phase 1’ in Bearna is a miscalculation. This test has been carried out in accordance with Land Use Zoning Objective Residential Phase 2 and Policy GCMA 1 Residential Development which states that

*“...Residential (Phase 2) lands are generally not developable within the lifetime of this Plan, with the exception of the following developments, which may be considered by the Planning Authority within the lifetime of this County Development Plan subject to a suitable case being made for the proposal:*

*...3. Where it is apparent that Residential (Phase 1) lands cannot or will not be developed within the plan period, residential development may be considered in a phased manner on some Residential (Phase 2) lands”*

As part of this submission, MKO prepared a Justification Test, to assess the lands zoned for ‘Residential Phase 1’ in the Draft Plan, based on their commitment to development or any constraints on these lands that may indicate that there is a need to amend the land use zoning of the Draft Plan. This Justification Test can be found in **Appendix 1**. The conclusion of this was as follows;

- There are 7 no. Phase 1 Residential zoned sites in Bearna. This equates to approximately 9.24 hectares of land.
- 4 no. of the 7 no. sites are committed to development (granted permissions, recorded commencement notice), currently map reference 4 is subject to judicial review and map reference 7 is under consideration by An Bord Pleanála.
- Approximately 6.8418 hectares of the 9.24 hectares zoned under ‘Residential Phase 1’ are committed to development.
- This concludes that of the lands zoned for ‘Residential Phase 1’ only 2.3982 hectares of land can be considered readily available for development.
- Of the available land, 2.04 hectares of land have ecological concerns being located within close proximity to the Trusky River which has hydrological connections to Galway Bay Complex SAC (Site code. 000268) and the Inner Galway Bay SPA (Site code. 004031). This constraint may impact the potential for development on these lands.
- Under ‘Volume 2 Metropolitan Area Strategic Plan’ (MASP) of the Draft Galway County Development Plan 2022-2028, the Core Strategy Table identifies a population projection of 750 for Bearna during the lifetime of the six-year lifetime of the plan.
- As referenced previously in this document, it is in our professional opinion that the population projection for Bearna has been extremely underestimated, giving its key location with the Metropolitan Area of Galway.

- > Given a projection of 750, the quantum of residential lands required to meet this growth is 10.00 hectares. This assessment has concluded that of the lands zoned for ‘Residential Phase 1’ 6.8418 hectares of land are considered as committed to development. The quantum of land of 10.00 hectares requires re-assessment of the Phase 2 lands in order to fill the capacity of these lands required to provide housing for the 750-no. population increase.
- > Furthermore, of the 4 no. lands (map reference 1, 2, 4, 7) committed to development, if developments were to be completed as granted on these sites, this would result in the construction of 186 no. units on 6.8418 hectares of land. Regarding the remaining 2.3982 hectares of land, the capacity of these lands to provide residential units for the remaining 564 no. population is unviable.

4.

## **CONCLUSION**

This submission has been prepared regarding the Draft Galway County Development Plan 2022-2028. The submission requests that the Planning Authority give consideration to the potential of our clients lands at Forramoyle East, Bearna, Co. Galway, and to change the zoning of the lands zoned ‘Residential Phase 2’ to ‘Residential Phase 1’.

Based on the findings of a Justification Test prepared by MKO, it is evident that the rezoning of these lands as ‘Residential Phase 1’ would significantly assist the Local Authority in meeting the housing targets set out for the Metropolitan Area of Galway.

We respectfully request that the planning Authority give due consideration to these matters in the preparation of the forthcoming plan.



## **APPENDIX 1**

**JUSTIFICATION TEST AS  
PREPARED BY MKO**



## **APPENDIX 2**

### **PLANNING HISTORY**



## **APPENDIX 3**

### **PLANNING POLICY CONTEXT**

