

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

Lands at Mountain Road,
Moycullen, Co. Galway





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Client: **Gillian Hanley**

Project Title: **Lands at Mountain Road, Moycullen, Co. Galway**

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1.

PREAMBLE

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 our client Mrs. Gillian Hanley, 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.

We acknowledge that the development plan for the period 2022-2028 is being prepared in changed context to the existing plan 2015-2021. New policy documents have been issued since the adoption of *Galway County Development Plan 2015-2021*, in which there is a new hierarchy of spatial plans that support the strategies of the Development Plan. A more urgent national focus on climate change mitigation and adaption with implementation of the National Climate Action Plan will be required to guide the drafting of policy. Relevant policy documents that have supported the context of the Draft Plan include:

- Project Ireland 2040: National Planning Framework
- Regional Spatial and Economic Strategy for the Western and Northern Assembly 2020-2032
- National Climate Action Plan 2019-2024

MKO have been appointed by Mrs. Gillian Hanley to prepare this submission on his behalf. In response to the contents of the *Volume 2: Small Growth Towns* of the *Draft Galway County Development Plan 2022-2028*, this submission will support the request for a change in zoning from ‘Agriculture’ to ‘Residential Phase 1’ or alternatively the re-instatement of these lands to Residential Phase 2 as per the Extant Plan. It is important to note that these lands were the subject of a previous grant of permission for 24 no. residential units (See Planning History below). Therefore, the principle of residential development on these lands has been accepted by Galway County Council from both a policy and development management perspective.

This submission is structured as follows:

- Section 1 – Preamble
- Section 2 – Introduction
- Section 3 – Planning Policy Context
- Section 4 – Assessment
- Section 5 – Purpose of Submission
- Section 6 – Conclusion
- Appendix 1 – Justification Test as prepared by MKO

2.

INTRODUCTION

The subject lands are located at Mountain Road, Maigh Cuilinn, Co. Galway. **Figure 1** below illustrates the location of the lands within the wider area, with **Figure 3** outlining the site boundary that the lands extend to.

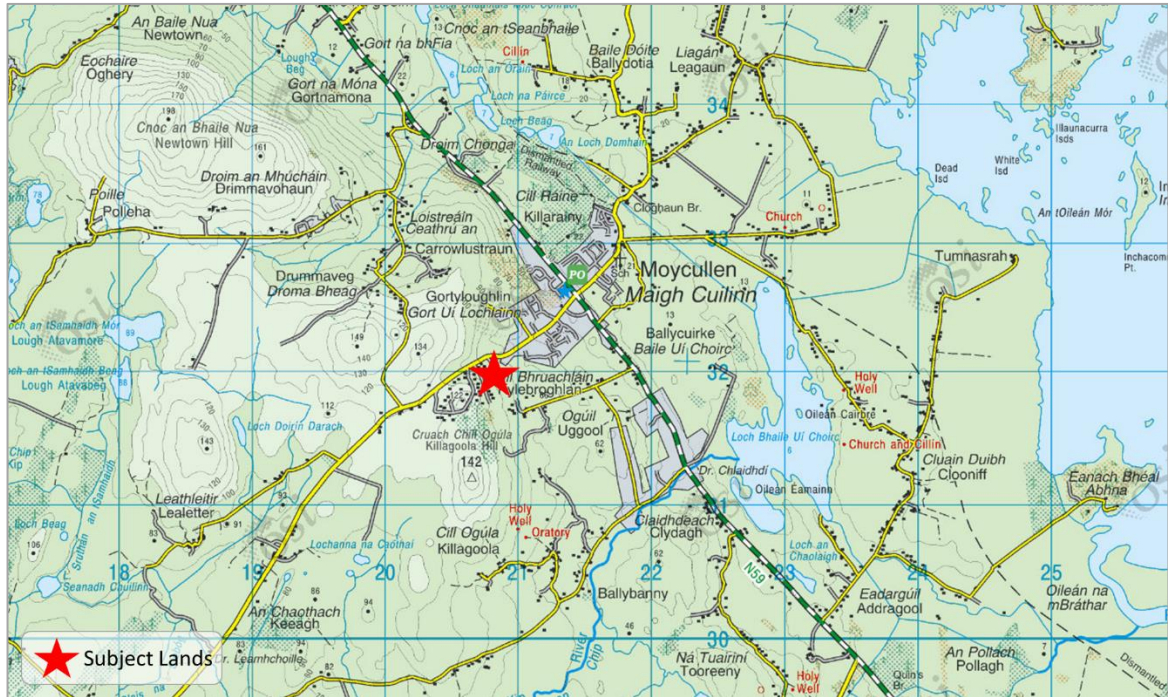


Figure 1: Location of subject lands within wider context (Source: MyPlan.ie, Edited by MKO)

2.1

Site Location

The subject lands are located south of Mountain Road. The road is a local road, L1320, which connects Maigh Cuilinn to Spiddal. The site is approximately 800 metres southwest of Maigh Cuilinn Village Centre (see **Figure 2**), and approximately 12.6 kilometres northwest of Galway City Centre.

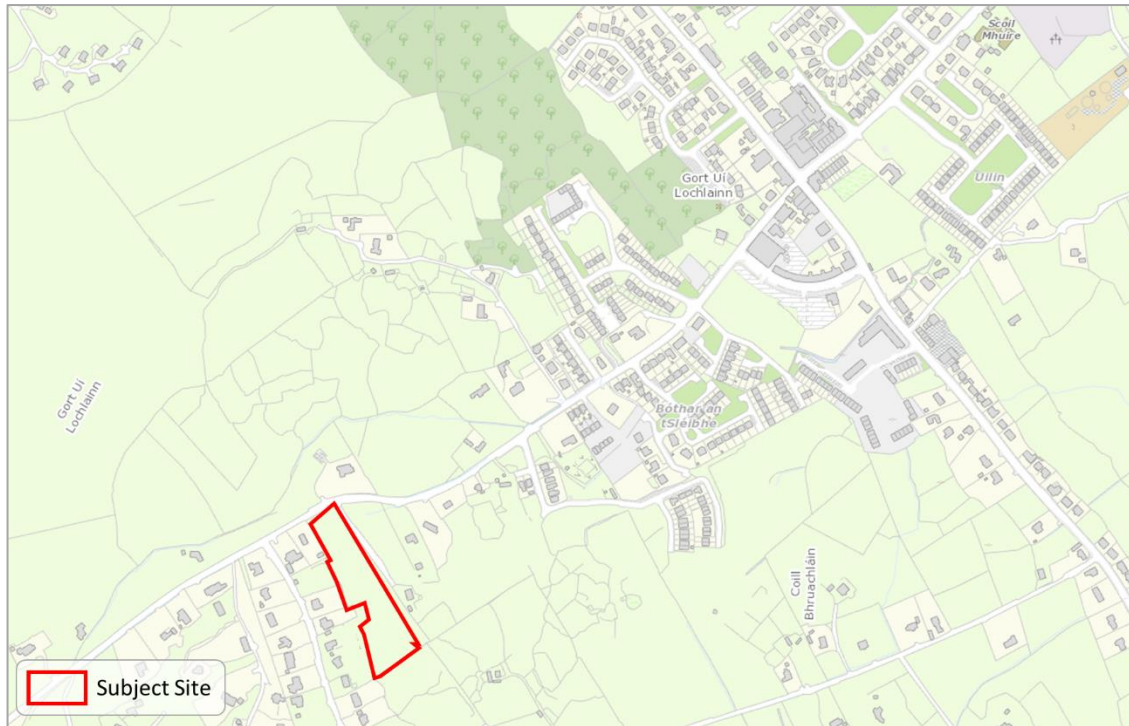


Figure 2: The Sites Location in the Context of Maigh Cuilinn (Source: My Plan.ie, Edited by MKO)

2.2

Site Description

The subject site measures approximately 1.5ha and consists of mainly shrub land. The site is bound to the west by linear housing, to the east by an access road, and to the north and south by surrounding shrubland. The area is predominantly comprised of both linear and one-off residential units.

The site is accessed via the existing L1320 local road on the northern boundary of the site. There is also a small access route located along the eastern boundary of the site (see **Figure 3**).



Figure 3: Access Roads Adjacent to the Site (Source: MyPlan.ie, Edited by MKO)



Figure 4: Subject Site (Source: MyPlan.ie, Edited by MKO)

2.3

Ecology

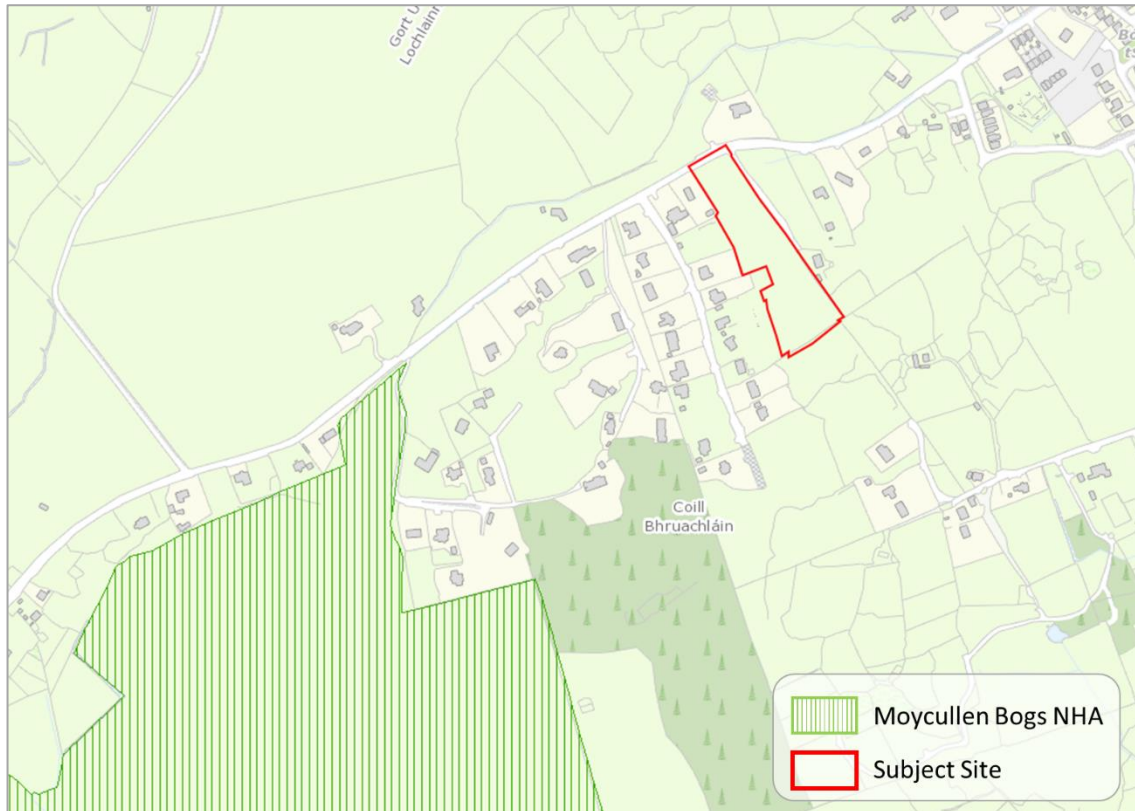


Figure 5: Proximity of the Subject Site to Moycullen Bogs NHA (Source: MyPlan.ie, Edited by MKO)

The Moycullen Bogs National Heritage Area (NHA) (Site Code 002364) is located approximately 410 metres from the subject site (Figure 5).

2.4

Planning History

According to the Galway County Council online planning portal there have been a number of planning applications on the subject lands. These are outlined below in **Table 1**.

Table 1: Planning Applications on the Site

Pl Ref.	Applicant	Development Description	Decision
12/674	Cathal Connolly	EXTENTION OF DURATION: for a variation to previously granted planning permission reference no. 07/1884 with the following variation:- drop in finished floor level of house no.s 4-24 of between 0.55 metres and 2 metres,- change of house no.7 from house type B1 to house type B2, change of house no.8 & no.9 from house type B3 to house type B1,- change of house no. 14 from house type B4 to house type B2,- change of house no. 15 from house type B2 to house type B4,- change of house no. 16 from house type B3 to house type B1,- change of house no. 23 from house type C1 to house type B1;- Attic accomodation added to house type C1 and C2, previous planning reference no. 07/4864	Conditional (2 no. conditions)

Pl Ref.	Applicant	Development Description	Decision
08/695	Kyle Partnership	for a variation to previously granted planning permission reference no's: 07/1884 and 07/4864 with the following variations: Change of house No. 5 from house type B3 to house type C1; Change of house nos. 8 from house type B1 to house type C1; Change of house no. 13 from house type B2 to house type C2; Change of house no. 15 from house type B4 to house type C2. Change of layout for house nos. 17, 18, 19, 20, and 21; Ridge height of lower roof on house type B1 to be raised. (Gross floor area 2754.4sqm (15 houses)	Conditional (28 no. conditions)
07/4864	Kyle Partnership	for a variation to previously granted planning permission reference no. 07/1884 with the following variation:- drop in finished floor level of house no.s 4-24 of between 0.55 metres and 2 metres,- change of house no.7 from house type B1 to house type B2, change of house no.8 & no.9 from house type B3 to house type B1,- change of house no. 14 from house type B4 to house type B2,- change of house no. 15 from house type B2 to house type B4,- change of house no. 16 from house type B3 to house type B1,- change of house no. 23 from house type C1 to house type B1;- Attic accommodation added to house type C1 and C2.	Conditional (29 no. conditions)
07/1884	Kyle Partnership	for the construction of 19 no. detached dwelling houses, 2 no. semi detached houses and 3 no. terraced houses, along with associated site development works. (Gross floor area 4765sqm)	GCC: Conditional (28 no. conditions) ABP: Modified Conditions

3.

PLANNING POLICY CONTEXT

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

3.1

National Planning Framework: Project Ireland 2040

In 2018, the Government of Ireland adopted the National Planning Framework (NPF) entitled *Ireland 2040* to succeed the National Spatial Strategy. The NPF comprises the Government's proposed long-term strategic planning framework to guide national, regional and local planning and investment decisions over the next 25 years. It is intended that the NPF will be a strategic document that will provide the framework for future development and investment in Ireland, providing a long-term and place-based aspect to public policy and investment, and aiming to coordinate sectoral areas such as housing, jobs, transport, education, health, environment, energy and communications, into an overall coherent strategy. The NPF has a number of national policy objectives that articulate delivering on a compact urban growth programme. The relevant objectives are as follows:

- National Policy Objective (NPO) 1 (b) relating to population growth in the region;
- National Policy Objectives (NPO) 2(a) relating to growth in our cities;
- NPO 4 relating to attractive, well-designed liveable neighbourhoods;
- NPO 5 relating to sufficient scale and quality of urban development; and
- NPO 6 relating to increased residential population and employment in urban areas.

National Policy Objective 1b states in the context of population growth to 2040:

‘Northern & Western Region – population growth of 180,000 additional people.’

Project Ireland 2040 envisages a new approach in how we deliver the provision of housing by 2040. The NPF sets out a framework that will underpin population growth of up to 1 million people with approximately 50% in the main 5 cities underpinned by the foundation of 10 National Strategic Outcomes. The collaboration on a focus growth agenda by 2027 has the potential to generate significant economic growth and increased employment across the region. Future housing development must be based on suitable travel patterns, infrastructure provision, employment and educational locations. However, it is vital that both public and private stakeholders in the region must cooperate to achieve the vision of an urban led, rurally connected place with high growth and quality of life. According to David Minton, Director of the NWRA,

“Central to this concept of Compact Growth, identifying where new growth can take place within the existing envelope of our Cities, Towns and villages, and in doing so, preventing sprawl, and bring Sustainability to our communities.”

In order to facilitate the provision of compact growth in our Towns and villages across the Region, it is vital that lands which are located in the heart of towns and villages are zoned appropriately to ensure that development, particularly residential, can be provided as required in sustainable locations.

There is a very significant population growth allocated to the Northern & Western Region in which Galway is the main urban centre. In order to facilitate this population growth there will be a requirement to develop large numbers of new houses and apartments, approx. 20,000 units based on a standard household size of 2.7 people. Given that Galway is currently acutely affected by the housing crisis there is a considerable divide to be bridged in order to bring housing provision from its current under-supply to the level required to accommodate the population growth forecasts. However, it is important that more sustainable development patterns are established in order to facilitate targeted services and infrastructure investment.

3.2

Regional Spatial and Economic Strategy (Northern and Western Regional Assembly) 2020-2032)

The Regional Spatial & Economic Strategy for the Northern & Western Regional Assembly 2020-2032 (RSES) was adopted on 24th January 2020. The principal 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 long-term strategic planning and economic framework for the development of the regions.

The RSES outlines that there is a projected total regional requirement to provide housing for between 160,000 and 180,000 additional people to 2040. These homes must also be provided with supporting infrastructure to make this growth sustainable and fit for purpose.

3.3

Galway County Development Plan 2015-2021

3.3.1

Land Use Zoning Objectives

Under the extant Development Plan 2015-2021, the subject lands are zoned 'Residential Phase 2'. Within this plan there are 7 sites that are zoned 'Residential Phase 1'. The subject lands in the context of their current land use zoning objectives can be seen below in **Figure 6**.

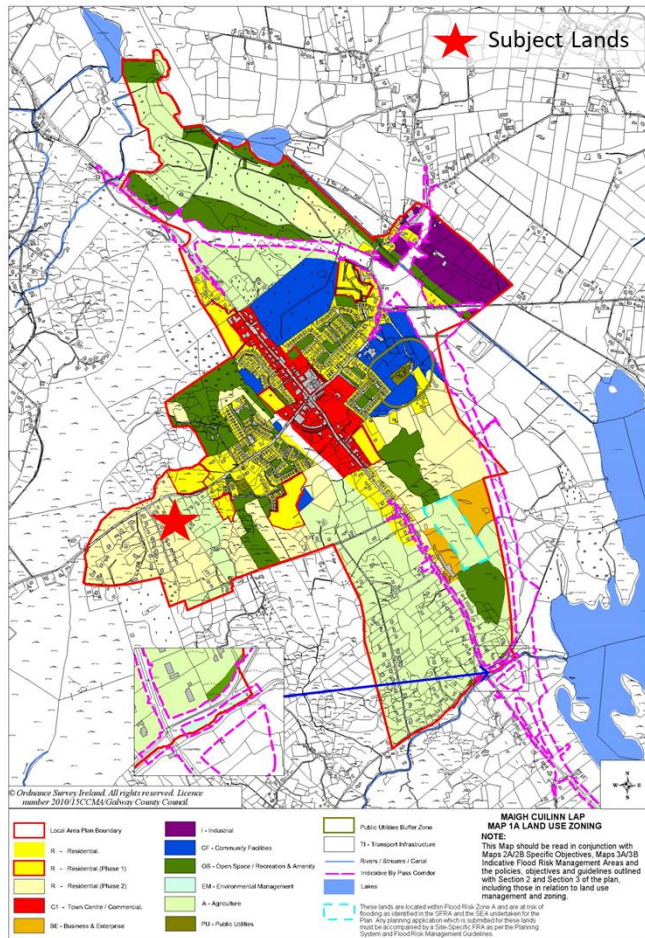


Figure 6: Extent Land Use Zoning Map for Maigh Cuilinn (Edited by MKO)

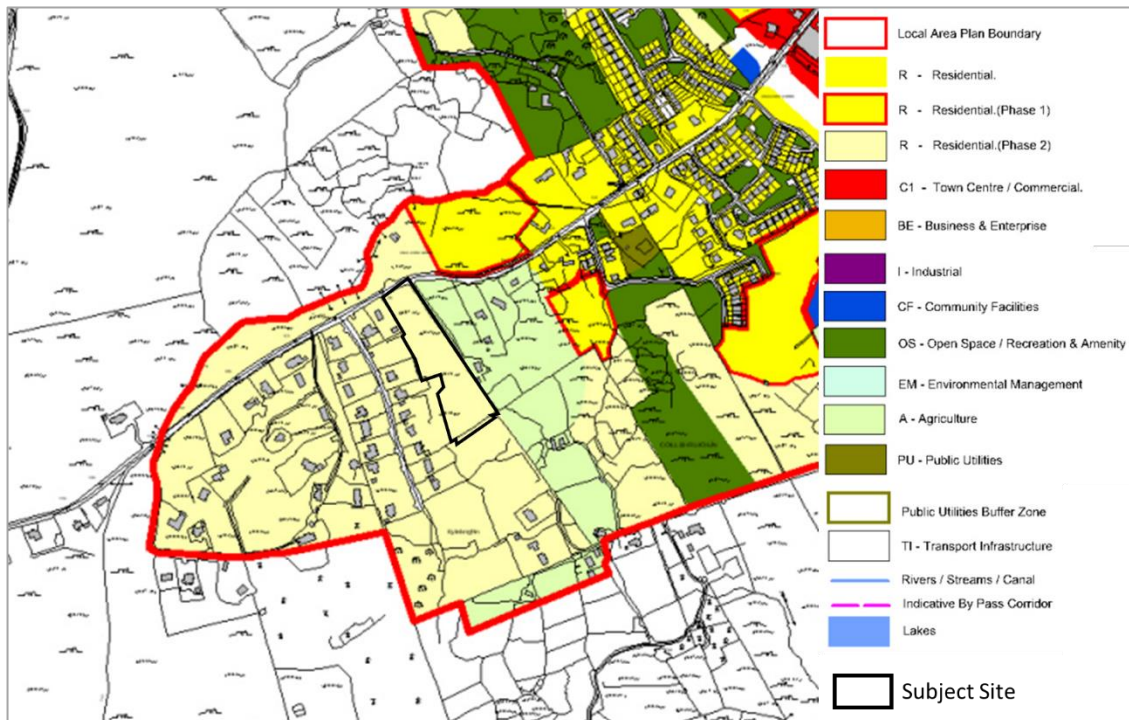


Figure 7: Extant Land Use Zoning on the Subject Site (Edited by MKO)

3.4

Draft Galway County Development Plan 2022-2028: Volume 2

Maigh Cuilinn is identified in the Draft Plan as a ‘Small Growth Town’ (SGT), which is the fourth tier of settlements as set out in the Core Strategy Settlement Hierarchy and Housing Strategy. It is the intention of the council *“To promote each Small Growth Town as a place to live, work and visit that offers a range of services and community facilities that offer a walkable town that accords with proper planning and sustainable development”*.

3.4.1

Land Use Zoning Objectives

The applicable land use zoning objective as outlined in the *Volume 2: Small Growth Towns* of the *Draft Galway County Development Plan 2022-2028* is ‘Agriculture’. **Figure 8** below illustrates the context of the subject lands with regard to the proposed land-use zoning objectives.

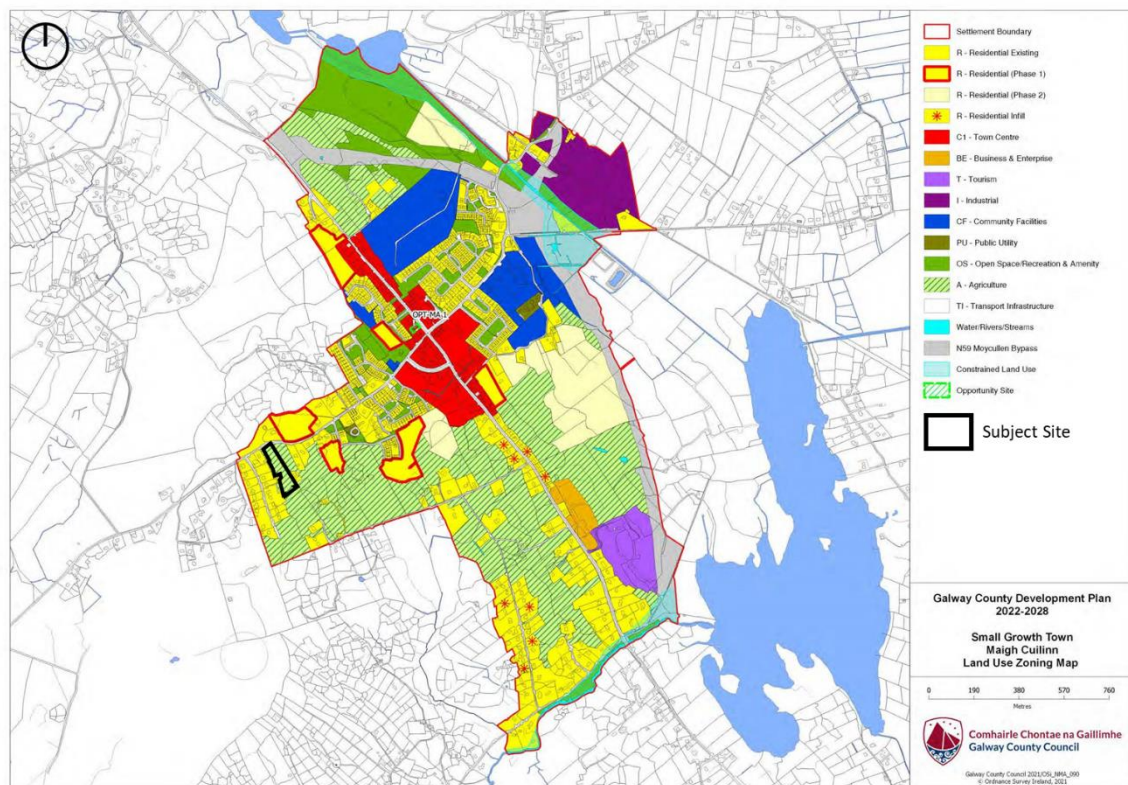


Figure 8: Draft Maigh Cuilinn Land Use Zoning Map 2022-2028 with the subject lands outlined in black (Edited by MKO)

Volume 2 of the Draft Plan (Small Growth Towns) refers to the land use zoning objectives and categorises residential development under two phases, as outlined below:

Residential Phase 1

Objective – To protect, provide and improve residential areas within the lifetime of this plan.

Description – To facilitate for the provision of high quality new residential developments at appropriate densities with layout and design well linked to the town centre and community facilities. To provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities.

Residential Phase 2

Objective – To protect, provide and improve residential areas.

Description - To facilitate the provision of high quality new residential developments at appropriate densities with layout and design well linked to the town centre and community facilities. Phase 2 residential is generally not developable during the lifetime of this plan subject to the provisions below.
(*Single House developments for family members on family owned lands:

*Non-residential developments that are appropriate to the site context, any existing residential amenity and the existing pattern of development in the area;

*Where it is apparent that R-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).

Policy SGT 1 Residential Development Phasing: Support the development of lands designated as Residential (Phase 1) within the lifetime of the Plan, subject to normal planning, access and servicing requirements, and reserve the lands designated as Residential (Phase 2) for the longer-term growth needs of each SGT. Residential (Phase 2) lands are generally not developable for housing within the lifetime of this Plan, with the exception of the following developments, which may be considered by the Planning Authority, subject to a suitable evidence based case being made for the proposal:

- a) Single house developments for local family members on family-owned land, subject to a 7-year occupancy clause.
- b) Non-residential developments that are appropriate to the site context, residential amenities, the existing pattern of development in the area and the policy objectives in the Plan.
- c) Where it is apparent that Residential (Phase 1) lands cannot or will not be developed for residential purposes within the plan period, residential development may be considered in limited cases in a phased manner on suitable Residential (Phase 2) lands, in exceptional circumstances:
 - Development on Residential (Phase 2) lands will normally only be considered where 50% of the lands in Residential (Phase 1) are committed to development.
 - Residential developments on Residential (Phase 2) lands will be subject to compliance with the Core Strategy, the principles of proper planning and sustainable development, connectivity, including infrastructure and public footpath and lighting to the town centre, the sequential approach, avoidance of leap-frog developments, and subject to meeting normal planning, environmental, access and servicing requirements. Developments will only be permitted where a substantiated evidence-based case has been made to the satisfaction of the Planning Authority and the development will not prejudice the future use of the lands for the longer-term growth needs of each settlement.

The subject lands have been zoned as ‘Agriculture’ in the Draft Plan.

Agriculture

Objective – To promote the development of agriculture and agriculture related uses in accordance with proper planning and sustainable development.

Description – To facilitate the further development of agriculture and facilitate opportunities for farm diversification with agriculture related uses.

4.

ASSESSMENT

4.1

Projected Population Growth and Housing Targets

Under Table 4.1 of Volume 2: Small Growth Towns, the population projection for Maigh Cuilinn for the lifetime of the plan is 350 (2022-2028), with the quantum of residential lands required outlined as 8.75 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 2: Population Allocation for Small Growth Towns (Source Draft Galway County Development Plan 2022-2028)

Settlement	Census 2016	Population Projection 2022 - 2028	Residential Units	Quantum of Residential Lands required (ha)
Clifden	1,597	470	195	12.19
Headford	973	290	116	7.25
Maigh Cuilinn	1,704	350	140	8.75
Oughterard	1,318	350	140	8.75
Portumna	1,450	300	120	7.50

Table 4.1: Population Allocation 2022-2028

There is a concern that the housing targets across the nation have not gone far enough to ensure the real housing need the country faces, which include some 200,000 new dwellings in the next 4 years, are met. The Small Growth Towns section of the Draft Development Plan predicts the requirement of 140 new dwellings over the plan period of 2022-2028, for 350 new residents in the town. This figure is very conservative, with the population predictions and housing demand projections according to the Housing Strategy and HDNA predicted to grow by approximately 18,655 people in the County in Scenario 1 with 1,644 new dwellings required per annum, totalling 9,864 dwellings required overall. These predicted figures differ among the scenarios, with Scenario 2 predicting approximately 1,465 dwellings required per annum, totalling 8,790 dwellings required overall, and scenario 3 predicting 7,469 dwellings required within the entire emerging plan period. This scenario 3 provides the lowest number of dwellings in the plan period and, surprisingly, is the scenario that the Local Authority appear to have based their targets off in the allocations for each settlement of the County.

This is of concern, as there is only sufficient land zoned and allocated for the most stringent of predictions while the Country as a whole faces an impending housing crisis. The Draft Development Plan does not go far enough with these figures, with the Small Growth Towns of County Galway only taking on some 711 new residential units over the entire plan period. These Small Growth Towns are expected to “*have an important function in supporting the development of local areas*” according to paragraph 2.4.9 of the Draft Plan Volume 1, and despite being focussed on localised sustainable growth, concern is held that some 711 new dwellings for all of the Small Growth Towns together is insufficient for this plan period and the future growth of County Galway.

Further, the lands which are zoned as Residential Phase 1 in this Draft Plan have not changed from the existing zoned lands set out in the Maigh Cuilinn Local Area Plan 2013-2023, nor has further land been proposed for residential development in the emerging plan. Queries are raised about the viability of these lands the length of time they have been zoned and not yet been developed. As such, the Local Planning Authority should not be relying on these lands zoned as Residential Phase 1 as the only lands available to bring forward the required housing targets over the plan period and should be considering

additional Phase 1 lands in sustainable and appropriate locations closer to the Town Centre, such as the lands subject to this submission.

4.2 Justification Test

Within the Draft Plan, there are 9.5 hectares of land zoned for ‘Residential Phase 1’. Similarly, as outlined above in **Section 4.1** it is our understanding that based on revised housing targets, and the targets of the NPF for growth in Galway, the 8.75 hectares of land zoned for ‘Residential Phase 1’ in Maigh Cuilinn is a miscalculation.

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 6 no. Phase 1 Residential zoned sites in Maigh Cuilinn. This equates to approximately 9.5 hectares of land.
- 2 no. of the 6 no. sites are committed to development
- Approximately 3.4 hectares of the 9.5 hectares zoned under ‘Residential Phase 1’ are committed to development.
- This concludes that of the lands zoned for ‘Residential Phase 1’ 6.1 hectares of land can be considered readily available for development.
- A number of key constraints have been identified on the 4 sites that are not committed to development. It is evident that there has been no history of planning applications on sites 1 and 3 (illustrated in **Figure 2** of **Appendix 1**), and that permission has been refused in the past on site 4 for reasons including lack of connectivity between the site and Maigh Cuilinn, safety, and proximity to designated sites.
- Under ‘Volume 2 Small Growth Towns of the Draft Galway County Development Plan 2022-2028, the Core Strategy Table identifies a population projection of 350 for Maigh Cuilinn 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 Maigh Cuilinn has been extremely underestimated, giving its key location within proximity of Galway City.
- Given a projection of 350, the quantum of residential lands required to meet this growth is 8.75 hectares. This assessment has concluded that of the lands zoned for ‘Residential Phase 1’ 3.4 hectares of land are considered as committed to development. The quantum of land of 8.75 hectares requires re-assessment of the Agriculture lands in order to fill the capacity of these lands required to provide housing for the 350 no. population increase.

5.

PURPOSE OF THE SUBMISSION

The purpose of this submission is to present a case for the rezoning of lands from ‘Agriculture’ to ‘Residential Phase 1’, on land that was zoned ‘Residential Phase 2’ in the extant 2015-2021 Development Plan. The priority of our client is to request that the entirety of the lands are rezoned to Phase 1. The results of the Justification Test (see **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 located in a strategic location, 800 metres southwest of Maigh Cuilinn Village.
- The lands extend to 1.5 hectares and have the capacity to help meet the housing targets for Maigh Cuilinn, as outlined in National, Regional, and Local plans.
- 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. The lands are also accessible through the L1320 local road and an existing access route adjacent to the site.

Residential development would be meeting both National and Regional policy objectives and population growth targets as outlined in **Section 3.1** and **Section 3.2**. The assessment of projected population growth targets indicates 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 Maigh Cuilinn that can be provided.

6.

CONCLUSION

This submission has been prepared regarding the Draft Galway County Development Plan 2022-2028. This submission requests that the Planning Authority give consideration to the potential of our clients lands at Mountain Road, Maigh Cuilinn, Co. Galway, and to change the lands zoned ‘Agriculture’ 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 town of Maigh Cuilinn.

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**



BRIEFING NOTE

Project Reference	210730
Date & Time	16/07/2021
Subject	Justification Test for Lands from 'Agriculture' to 'Residential Phase 1'
Author(s)	Orla McCafferty Planner

Residential Phasing

'Volume 2 Small Growth Towns' of the Draft Galway County Development Plan 2022-2028 outlines the residential phasing policy, in Section 4.4 Land Use Zones. **Figure 1** below illustrates the Maigh Cuilinn Land Use Zoning Map, taken from the Draft Plan. The black line denotes the subject lands of which this Justification Test has been prepared to support a submission for the change in zoning from 'Agriculture' to 'Residential Phase 1'.

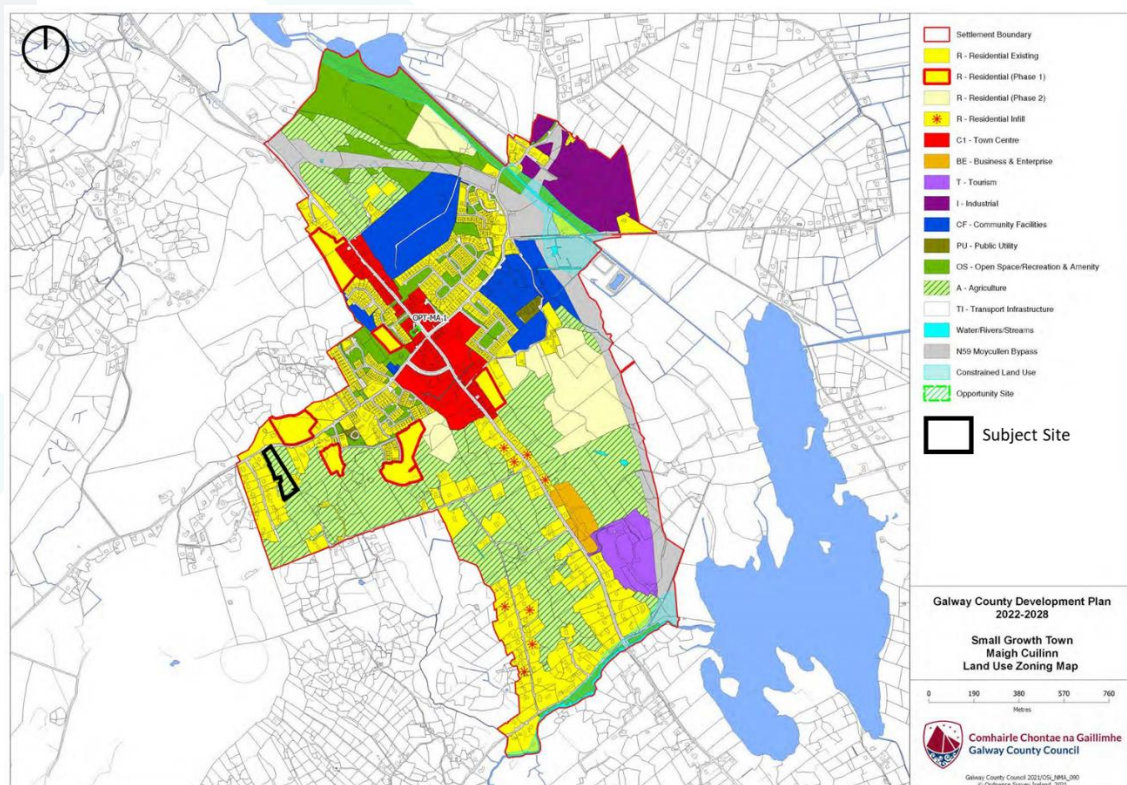


Figure 1: Maigh Cuilinn Land Use Zoning Map with subject lands outlined in black (Edited by MKO)



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Residential Phase 1

Objective – To protect, provide and improve residential areas within the lifetime of this plan.

Agriculture

Objective – To promote the development of agriculture and agriculture related uses in accordance with proper planning and sustainable development.

Policy SGT 1 Residential Development Phasing

Where it is apparent that Residential (Phase 1) lands cannot or will not be developed for residential purposes within the plan period, residential development may be considered in limited cases in a phased manner on suitable Residential (Phase 2) lands, in exceptional circumstances: •

- Development on Residential (Phase 2) lands will normally only be considered where 50% of the lands in Residential (Phase 1) are committed to development.
- Residential developments on Residential (Phase 2) lands will be subject to compliance with the Core Strategy, the principles of proper planning and sustainable development, connectivity, including infrastructure and public footpath and lighting to the town centre, the sequential approach, avoidance of leap-frog developments, and subject to meeting normal planning, environmental, access and servicing requirements. Developments will only be permitted where a substantiated evidence-based case has been made to the satisfaction of the Planning Authority and the development will not prejudice the future use of the lands for the longer-term growth needs of each settlement.

Projected Population Targets

Under Table 4.1 of Volume 2: Small Growth Towns, the population projection for Maigh Cuilinn for the lifetime of the plan is 350 (2022-2028), with the quantum of residential lands required outlined as 8.75 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.

Settlement	Census 2016	Population Projection 2022 - 2028	Residential Units	Quantum of Residential Lands required (ha)
Clifden	1,597	470	195	12.19
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Maigh Cuilinn	1,704	350	140	8.75
Oughterard	1,318	350	140	8.75
Portumna	1,450	300	120	7.50

Table 4.1: Population Allocation 2022-2028

The National Planning Framework targets predict that Galway County will grow by 25,500 people by 2026 and by 14,000 people by 2031. Across an 8 year period from 2018 and 2026, a growth of 25,500 represents 1,750 people per year. Across a 4 year period from 2027 to 2031, a growth of 14,000 represents 3,500 people per year.



The provision of a population projection for Maigh Cuilinn for the lifetime of the Draft Plan (2022-2028) means that there is a projected growth of 53 persons per year for Maigh Cuilinn during this 6 year period. This population projection of 350 is considered low based on Galway County having a predicted growth of approximately 14,000 people during this 6 year period. Maigh Cuilinn 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.

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.

Justification Test – Assessment of Phase 1 Residential Lands

In order to demonstrate compliance with the residential phasing policy detailed above, and to outline that the quantum of Phase 1 lands in Maigh Cuilinn are significantly under-zoned, it is necessary to undertake a review and assessment of the Phase 1 Residential lands in the village to establish:

1. What proportion of Phase 1 lands have been fully developed or committed to development?
2. Of the Phase 1 lands that have not been committed to development, is there evidence of any constraints associated with those lands to explain why they have not been committed to development to date and are unlikely to be committed to development?

The review identified 6 no. Phase 1 sites which are outlined in **Figure 2** below, as edited by MKO for clarification of each site in the assessment that will follow. These sites are illustrated in the ‘*Draft Galway County Development Plan 2022-2028 –Small Growth Towns– Maigh Cuilinn Land Use Zoning Map*’. Each site was assessed to establish whether any development had taken place or was underway. A note of any extant planning permissions was made. Finally, they were assessed to establish if there are any constraints on the lands. **Table 1** below provides an overview summary of the exercise which is discussed in further detail below. This exercise is carried out by MKO with documentation available at the time of preparation (July 2021), all measurements are approximate, and the information outlined has not been confirmed by MKO.



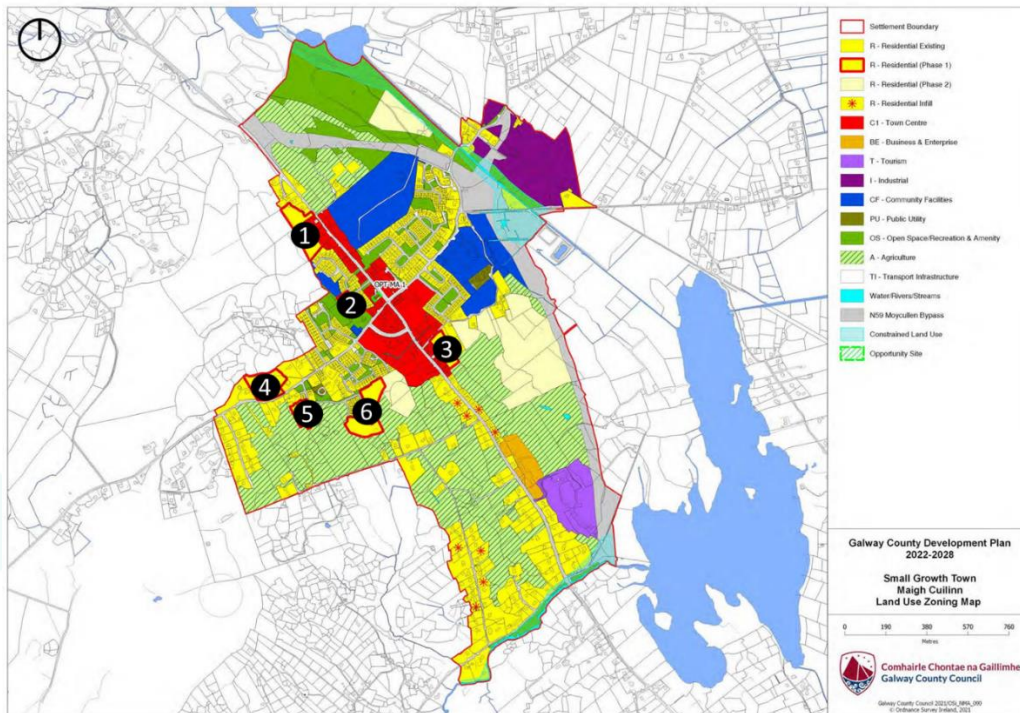


Figure 2: Land Use Zoning Map which outlines the 6 no. Phase 1 Residential Lands (Edited by MKO)

Table 1: Overview summary of Phase 1 Residential Lands

Map Ref.	Approx. Size in Hectares	Committed to Development	Evidence of Constraints	Relevant Planning History References	No. of Units Committed to/Built	Constraints?
1	2 ha.	No	Yes	N/A	0	<ul style="list-style-type: none"> ➤ No history of planning applications ➤ New access would be required off N59 national route to enable access.
2	0.8 ha.	No	Yes	08/1773	0	<ul style="list-style-type: none"> ➤ Application 08/1773 by Moycullen Sonas Voluntary Housing Assoc. Ltd. for a 14 single storey dwellings houses was Withdrawn on 29/10/2008. ➤ Lands may have funding constraints.
3	1.1 ha.	No	Yes	N/A	0	<ul style="list-style-type: none"> ➤ No history of planning applications ➤ New access would be required to N59 via an unclassified road.



4	1.9 ha.	No	Yes	17/1515	0	<p>➤ Permission Refused to Bohmore Ltd via 17/1515. Reasons for refusal include layout and design, lack of connectivity between the site and Moycullen, safety, and proximity to designated sites.</p>
5	0.9 ha.	Yes	Yes	20/179 17/1510 09/1850 06/5813	<p>113 units granted permission over sites 5 and 6.</p> <p>Approx. 19 units remaining to be built on this area of the wider site</p>	<p>➤ Permission Granted to McNerney Homes Ltd. via 09/1850 for change of house type on previously approved residential scheme (06/5813). Expired on 10/01/2015 and the development has been commenced.</p> <p>➤ An EOD has been granted under refs: 20/179 and 17/1510 which will expire on 31/12/2021.</p> <p>➤ It is not clear how much of this development will come forward prior to planning permission expiring or if it will be completed.</p>
6	2.8 ha.	Yes	Yes	17/1510	<p>113 units granted permission over sites 5 and 6.</p> <p>Approx. 67 units remaining to be built on this area of the wider site.</p>	<p>➤ Extension of Duration for 06/5813 and 12/1112 granted under 17/1510, which will expire on 31/12/2021.</p> <p>➤ It is not clear how much of this development will come forward prior to planning permission expiring or if it will be completed.</p>

Map Reference 1

- The site is not committed to development
- There is no planning history recorded on this site. There may be constraints in terms of access as new access would be required off N59 national route to enable access.
- 2 hectares of land.
- Current Ownership of GY11716F – lands are registered to Gerard Walsh (Badger Hill Ogonnelloe Scarriff County Clare)



- Current ownership of GY39236F – lands are registered to Austin Clancy (Gortyloughlin Moycullen County Galway)

Map Reference 2

Planning Ref.	Applicant	Description	Decision
08/1773	Moycullen Sonas Voluntary Housing Association Ltd	to construct a Day Care Centre and 14 no. single storey dwellinghouses consisting of 6 no. detached and 8 no. semi-detached dwellings for elderly residents with new site entrance, temporary access road, car parking, boundary walls and associated site works (Gross floor area 1357 sqm)	Withdrawn

- This site is not currently committed to development.
- Current ownership of GY21269F – lands are registered to Galway County Council

Map Reference 3

- The site is not currently committed to development
- There is no planning history recorded on this site. There may be constraints in terms of access as new access would be required to N59 via an unclassified road.
- Current ownership of GY91131F – lands are registered to Michael Walsh (Uggool Moycullen County Galway)
- Current ownership of GY54979 – lands are registered to Anne Patricia McKiernan Prat (Mount St. Josephs Moycullen County Galway)
- Current ownership of GY24640 – lands are registered to Hugh McKiernan (Griague Adare County Limerick)

Map Reference 4

Planning Ref.	Applicant	Description	Decision
17/1515	Bohmore Ltd	for the construction of a residential development, comprising: 1). 2 No. Single Storey 4 bedroom detached dwellings (Type A) 2). 2 No. two storey with split level access 3 bedroom detached dwellings Type B) 3). 8 No. two storey 4 bedroom semi-detached dwellings (Type C) 4). 2 no. two storey 4 bedroom detached dwellings (Type C) 5). 8 No. two storey 3 bedroom semi-detached dwellings (Type D). 6). 2 no. two storey with split level access 3 bedroom end of terrace dwelling (Type E) 7). 6 No. two storey with split level access 2 bedroom terrace dwellings (Type F) 8). 2 No. single storey bin stores. 9). Connection to existing services on the public road. 10). Related car parking and ancillary services. Gross floor space of proposed works 3359.0sqm.	Refused (27/02/2018) Reasons for refusal include layout and design, lack of connectivity between the site and Moycullen, safety, and proximity to designated sites.



- This site is not currently committed to development.
- Key constraints identified in a previous application include lack of connectivity to Moycullen village, safety hazards, and the sites proximity to Ross Lake SAC.
- Current ownership of GY25478 – lands are registered to Bohmore Limited (Haymarket House Haymarket Dublin 7)

Map Reference 5

Planning Ref.	Applicant	Description	Decision
20/179	Solemia Unlimited Company	consisting of change of house type on previously approved residential scheme (Planning Ref; 06/5813) on sites No.3 to 18 from, previously granted, 16No. four bed semi-detached dwelling houses to 2No. four bed detached units, 4No. four bed semi-detached units, 2No. four bed terraced units, 4No. three bed semi-detached units and 7No. three bed terraced units along with all associated site works and services. Gross floor space of proposed works: 2,286.80 sqm	Granted subject to 11 no. conditions (08/04/2020)
17/1510	Solemia Unlimited Company	for full permission for a residential development consisting of 113 residential units comprising of 24 5-bed detached dwellings, 4 4-bed detached dwellings, 24 4-bed semi detached dwellings, 48 3-bed semi-detached dwellings, 13 3-bed terrace dwellings. Permission is also sought for the provision of an access onto the Spiddal Road, an internal temporary access road, connection to the existing public sewer along with all other ancillary site services, previous planning reference no. 06/5813 & 12/1112 (Gross floor area 15,507 sqm)	Granted subject to 1 no. condition (07/12/2017)
09/1850	McInerney Homes Ltd	for change of house type on previously approved residential scheme (pl. 06/5813) on sites no 3 to 18 from 16 number 4 bed semi-detached dwelling houses to 10 number 3 bed semi-detached units, 6 number 4 bed semi-detached units and 2 number 4 bed detached units with associated site works and services (gross floor space 2142sqm)	Granted subject to 20 no. conditions (25/11/2009)
06/5813	McInerney Homes Ltd	for outline planning permission to construct a creche measuring 450 sqm and for full permission for a residential development consisting of 113 residential units comprising of 24 5-bed detached dwellings, 4 4-bed detached dwellings, 24 4-bed semi detached dwellings, 48 3-bed semi-detached dwellings, 13 3-bed terrace dwellings. Permission is also sought for the provision of an access onto the Spiddal Road, an internal temporary access road, connection to the existing public sewer along with all other ancillary site services (Gross floor area 15,507 sqm)	Granted subject to 18 no. conditions (09/09/2007)



- The site is committed to development under Pl. Ref 20/179 and Pl. Ref 17/1510, for 19 units on 0.6 ha of land.
- Current ownership of GY127710F – lands are registered to Solemia Limited (Leixlip Centre Leixlip County Kildare)

Map Reference 6

Planning Ref.	Applicant	Description	Decision
17/1510	Solemia Unlimited Company	for full permission for a residential development consisting of 113 residential units comprising of 24 5-bed detached dwellings, 4 4-bed detached dwellings, 24 4-bed semi detached dwellings, 48 3-bed semi-detached dwellings, 13 3-bed terrace dwellings. Permission is also sought for the provision of an access onto the Spiddal Road, an internal temporary access road, connection to the existing public sewer along with all other ancillary site services, previous planning reference no. 06/5813 & 12/1112 (Gross floor area 15,507 sqm)	Granted subject to 1 no. condition (07/12/2017)

- The site is committed to development under Pl. Ref 17/1510, for 67 units on 2.8 ha of land.
- Current ownership of GY106293F– lands are registered to Solemia Limited (Leixlip Centre Leixlip County Kildare)

Conclusion

The foregoing assessment has established that:

- There are 6 no. Phase 1 Residential zoned sites in Maigh Cuilinn. This equates to approximately 9.5 hectares of land.
- 2 no. of the 6 no. sites are committed to development (granted permission)
- Approximately 3.4 hectares of the 9.5 hectares zoned under 'Residential Phase 1' are committed to development.
- This concludes that of the lands zoned for 'Residential Phase 1' 6.1 hectares of land can be considered readily available for development.
- A number of key constraints have been identified on the 4 sites that are not committed to development. It is evident that there has been no history of planning applications on sites 1 and 3 (illustrated in **Figure 2**), and that permission has been refused in the past on site 4 for reasons including lack of connectivity between the site and Moycullen, safety, and proximity to designated sites.
- Under 'Volume 2 Small Growth Towns of the Draft Galway County Development Plan 2022-2028, the Core Strategy Table identifies a population projection of 350 for Maigh Cuilinn 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 Maigh Cuilinn has been extremely underestimated, giving its key location within proximity of Galway City.



- Given a projection of 350, the quantum of residential lands required to meet this growth is 8.75 hectares. This assessment has concluded that of the lands zoned for 'Residential Phase 1' 3.4 hectares of land are considered as committed to development. The quantum of land of 8.75 hectares requires re-assessment of the Agriculture lands in order to fill the capacity of these lands required to provide housing for the 350-no. population increase.

This assessment demonstrates clearly that the number of lands zoned for 'Residential Phase 1' will not cater for the predicted growth of Maigh Cuilinn within the lifetime of the upcoming plan. It is therefore necessary to consider the rezoning of 'Agriculture' lands to cater for this population growth.

Caveat

The planning advice contained in this briefing note is given without prejudice, and ultimately, the development potential of the subject lands will be determined through the statutory planning process. The area and boundaries of the subject lands used in this report are based on the available documentation and have not been verified by MKO.



