

# **Draft Galway County Development Plan 2022 - 2028**

Submission on Lands at  
Lemonfield, Oughterard,  
Co. Galway





## DOCUMENT DETAILS

Client: **Keogh Family**

Project Title: **Draft Galway County Development Plan 2022 – 2028 – Keogh Representation**

Project Number: **200151**

Document Title: **Keogh Draft Galway CDP Representation**

Document File Name: **200151 Keogh Lemonfield Draft Galway County Development Plan Representation 30.07.21 F**

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Rev	Status	Date	Author(s)	Approved By
F	Final	30/07/2021	JB	GMC

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# 1. INTRODUCTION

On behalf of our client, the Keogh Family, MKO wish to make the following submission on Galway County Council’s Draft Galway County Development Plan 2022 – 2028 (DCDP) with regard to how the next iteration of the county development plan will manage the future growth and development of Oughterard, Co. Galway.

Galway County Council has prepared a Core Strategy, as per Chapter 2 of the DCDP, which sets out a quantitative strategy for identifying, reserving and phasing the development of land in line population and housing targets for the county over the lifetime of the plan. The Core Strategy includes a Settlement Hierarchy for the County which provides a strategic direction for the appropriate management of growth, investment and resources in accordance with prescribed regional population targets set for county level to settlement and rural areas identified. The position of each town in the Settlement Hierarchy has been linked to the quantitative population allocations and the distribution of future population growth. Similar to other counties in Connacht, the majority of Galway’s population is broadly dispersed across rural towns, villages and the open countryside with a smaller proportion of population living within a network of urban settlements. Specifically, the DCDP records, at the county level and based on the CSO’s parameters, a total of 39,913 people (22.2%) were living in urban settlements in 2016 whereas 139,477 (77.8%) were living in smaller towns and villages as well as the rural remainder of the County, as shown below in Table 1.

Table 1. Population Growth in County Galway 2011 - 2016

Settlement Hierarchy	Settlement	Population CSO 2011	Population CSO 2016	Growth Rate 2011-2016 (%)
Metropolitan Area	Baile Chláir	1,217	1,248	+2.55
	Bearna	1,878	1,998	+6.39
	Oranmore	4,799	4,990	+3.98
Key Towns	Ballinasloe	6,659	6,662	+0.05
	Tuam	8,242	8,767	+6.37
Strategic Potential	Athenry	3,950	4,445	+12.53
Self-Sustaining Towns	Gort	2,644	2,994	+13.24
	Loughrea	5,062	5,556	+9.76
Small Growth Towns	Clifden	2,056	1,597	-22.32
	Maigh Cuilinn	1,559	1,704	+9.30
	Oughterard	1,333	1,318	-1.13
	Portumna	1,530	1,450	-5.23
	Headford	889	973	+9.45
Small Growth Villages	An Cheathrú Rua	814	786	-3.44
	An Spidéal	250	237	-5.20
	Ballygar	660	687	+4.09
	Dunmore	577	600	+3.99
	Glenamaddy	500	480	-4.00
	Kinvara	620	730	+17.74
	Moylough	503	518	+2.98
Rural Settlements & Rural Area		129,382	131,650	+2.91

Source: Draft Galway County Development Plan 2022 – 2028 (Table 2.2)

Note: >1,500 population is defined as ‘urban’ as per the CSO and National Planning Framework (2018)

As indicated by Table 1, the overall rate of population growth between 2011 - 2016 is higher within the urban fabric of the county, particularly within those settlements which are located along the periphery of Galway city (e.g. Galway Metropolitan Area), with population decline occurring more frequently in smaller towns and villages. While population decline in more rural areas is a common trend occurring throughout the country, the emergence of the remote-working model due to COVID-19 has fundamentally changed how smaller towns and villages, particularly in the Western region, are now viewed by the younger and working population. The *National Remote Work Strategy* (January 2021)

states that remote working provides clear opportunities to relieve accommodation pressures in cities (e.g. Galway) where demand has caused rent and house prices to increase significantly and facilitate workers to move to less congested urban and rural locations. In highlighting this new driver for balanced regional development, the *National Remote Work Strategy* states that,

*“Already the rapid onset of remote working has resulted in an increase in interest for rural properties. According to analysis from MyHome.ie, searches for properties under €100,000 have increased by six times in counties Cork and Leitrim and by **five times in Galway**, Wexford and Mayo.” (Pg. 10)*

The growing interest in smaller towns and villages within Co. Galway as result of this increased living flexibility has consequently placed a greater onus on Galway County Council to manage the ‘*county’s most significant place-making challenge*’, as described within the DCDP, to plan and deliver self-sustaining development which allows towns, villages and rural components to play to their strengths and avoid unnecessary sprawl-led development models. Against this backdrop, Oughterard, Co. Galway, 27km north-west of Galway City via the N59 and located within a Strategic Development Corridor, is an ideal example of a ‘Small Growth Town’ which has the necessary facilitating infrastructure in place to exceed estimated growth benchmarks over the lifetime of the plan.

In consideration of the various strengths of Oughterard and the infrastructure already in place within the town, the Keogh Family strongly encourages Galway County Council to adopt a proactive approach to the future development of Oughterard and maximise the town’s reserve Residential (Phase 2) landbank in order to accommodate any future growth scenario. It is requested that the following land parcels, which in part comprise the Keogh Family’s Folio No. GY52270, at Lemonfield townland, Oughterard, Co. Galway are re-zoned as set out in Table 2 and shown within Figure 1 (overleaf). **It should be emphasised that these sites are independent of each other and the re-zoning of a specific site is not dependent on the entirety of the requested zonings being adopted.**

Table 2. Draft Oughterard Land Use Zoning Map – Requested Re-Zoning Designations of Subject Sites

Site	Area (ha)	Proposed Zoning	Requested Re-Zoning
A	4.66	‘Unzoned’ - Greenfield	R - Residential (Phase 2)
B	0.35	‘Unzoned’	R - Residential (Existing)
C	0.34	‘Unzoned’ - Greenfield	R - Residential (Phase 2)
D	0.74	‘Unzoned’ - Access	R - Residential (Phase 2)

These sites are strategically positioned within the settlement footprint of Oughterard, e.g. connectivity to the town centre and community facilities, proximate to recreational and amenity lands, accessible to major transportation routes, etc., which would inherently support the zoning of Residential (Phase 2) and any future residential development, as required, over the lifetime of the plan. The inclusion of these rezonings will augment the existing quantum of residential lands identified for Oughterard whilst also safeguarding the subject sites for future development. The remainder of this representation will therefore consider the above provisions as set out in the following sections:

- Strategic Planning Context; and
- Sequential approach to Oughterard’s residential (phase 2) reserve

The Keogh Family welcomes the opportunity to comment on the Draft Galway County Development Plan 2022-2028 in order to assist in shaping the future of Oughterard.

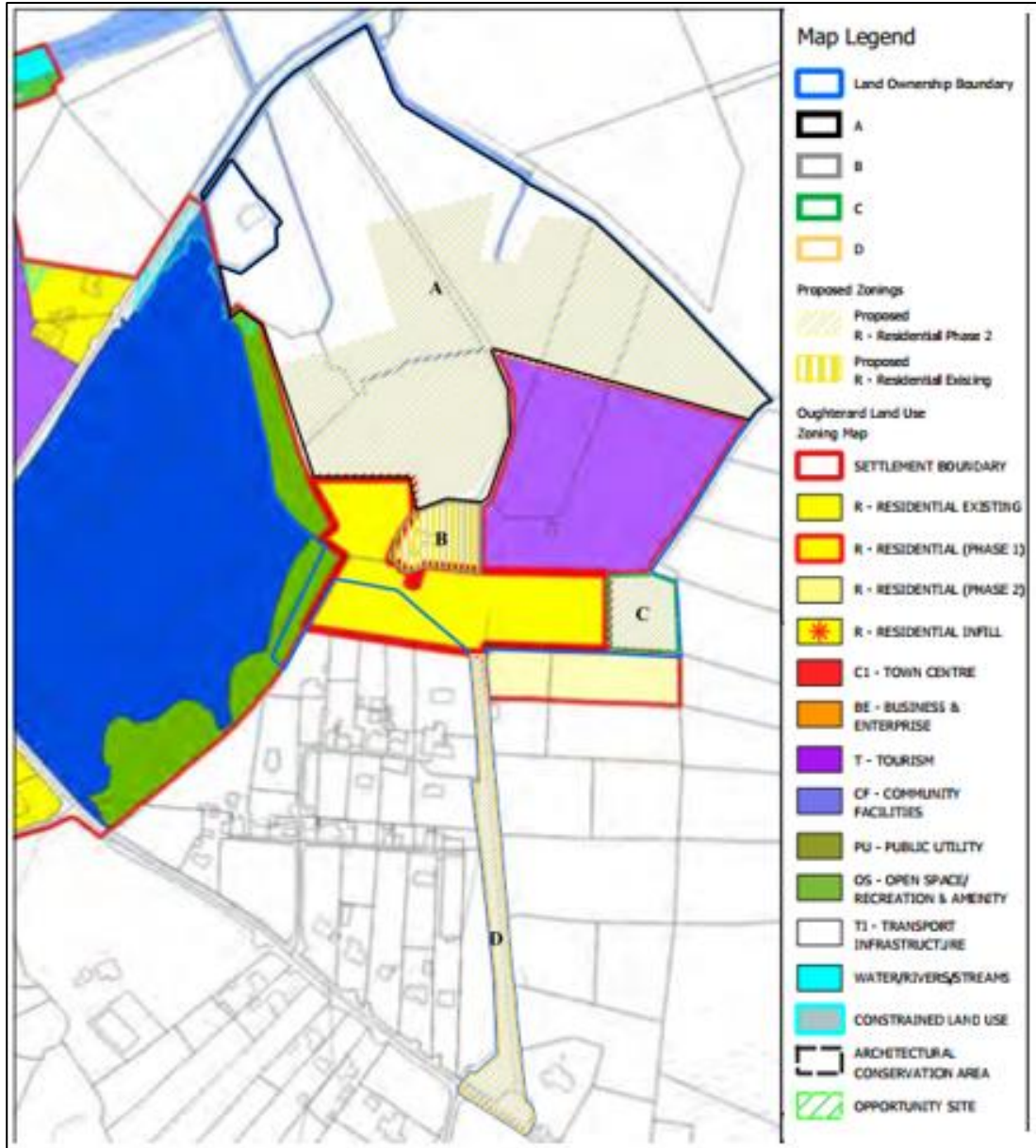


Figure 1. Key Plan – Requested Re-Zoning Designations of Subject Sites  
 Note: Please refer to Appendix 1 – Map 3 for Key Plan

## 2. STRATEGIC PLANNING CONTEXT

The DCDP's Core, Settlement and Housing Strategies were prepared in line with the national and regional policy objectives set out within the National Planning Framework and in the Northern and Western Regional Spatial Economic Strategy. It is therefore important to fully consider the strategic planning context of the requested re-zoning of the subject sites. This section of the representation identifies the national, regional and local planning policies, objectives and guidance that are relevant to the proposal, and demonstrates how the requested re-zonings will be consistent with the same.

### 2.1 National Policy Framework

#### 2.1.1 National Planning Framework (2018)

Ireland 2040 - National Planning Framework, hereafter referred to as the NPF, published by the Government in February 2018, is a 20-year planning framework designed to a focus on economic development and investment in housing, water services, transport, communications, energy, health and education infrastructure..

The NPF states that there are many towns and villages within Ireland which are '*intrinsic to sustaining viable rural communities and do not function independent of their rural hinterland*'. It is further expanded upon within the NPF that rural towns, such as Oughterard, function as local drivers for their surrounding areas through well-established economic, administrative and social functions. As such, National Policy Objectives (NPO) 3a, 6 and 7 seeks to strengthen and diversify rural towns to be a focus for local housing and employment growth:

- **NPO 3a:** Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements
- **NPO 6:** Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.
- **NPO 7:** Apply a tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on:
  - Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth;
  - In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth.

In terms of Ireland's future population, circa one million additional people are expected to be living in Ireland by 2040, and **National Objective 1b** seeks to ensure this growth is felt across all the regions; specifically, a population growth target of 180,000 people has been identified for the Northern and Western Region. In order to facilitate this population growth, there will be a requirement to develop large numbers of new houses and apartments, c. 20,000 units based on a standard household size of 2.4 people. Given that Galway and the Galway Metropolitan Area is currently acutely affected by the housing crisis with regard to both supply and the rental market, it is becoming increasingly apparent that lower tier settlements within the Settlement Hierarchy, including Oughterard, will need to assist supporting this overall growth of Galway and the broader region

The inclusion of additional reserve Residential (Phase 2) lands within the existing footprint of Oughterard would be compliant with the overarching housing strategy of the NPF as it will, if required, contribute to the 40% target (NPO 3a) in addition to providing the town greater flexibility in adapting to the future needs of the surrounding environs and potential influx of individuals looking to relocate to more rural, affordable areas of the region.

2.2

## Northern and Western Regional Spatial and Economic Strategy (2020)

The Northern and Western Regional Assembly (NWRA) has a recognised leadership role in setting out regional policies and coordinating initiatives which support the delivery and implementation of the National Planning Framework (NPF). The primary vehicle for this is the preparation and implementation of the Northern and Western Regional Spatial and Economic Strategy 2020 - 2032 (RSES). Section 1.3 of the RSES assesses ‘spatial impact’ and indicates clear support for continued ‘Compact Growth’ within the region; specifically, 40% of future housing development is set to be within the existing footprint of built-up areas (as per the NPF), making better use of underutilised land and buildings, including infill and brownfield properties. The importance of ‘Compact Growth’ within the Region is further emphasised within the RSES’s Growth Framework where it is stated,

*“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 RSES acknowledges that Galway has been Ireland’s most rapidly developing area for half a century and is a ‘key driver for the West of Ireland’. The RSES emphasises that the regeneration of smaller towns and villages across the region is a major priority action which will provide opportunities to address economic, physical and social decline issues. The RSES sets out the target growth of 30% all new housing within existing urban footprints outside of Galway City and suburbs footprint. The following Regional Policy Objectives are considered particularly relevant to the requested re-zoning of the subject sites.

- **RPO 3.2(c):** Deliver at least 30% of all new homes that are targeted in settlements with a population of at least 1,500 (other than the Galway MASP and the Regional Growth Centres), within the existing built-up footprints;
- **RPO 3.4:** To support the regeneration and renewal of small towns and villages in rural areas;
- **RPO 3.13:** To support the role of smaller and medium-sized towns, which demonstrate an important role in terms of service provision and employment for their catchments within the economic function of the county. Such settlements will be identified through the Development Plan process as part of the Settlement Hierarchy and the Core Strategy.

The RSES is ultimately supportive of the future growth of smaller towns, such as Oughterard, within the region and the need to ensure that there is an adequate reserve of land within each settlement boundary to facilitate the achievement of housing targets.

2.3

## Local Policy Framework

2.3.1

### Galway County Development Plan 2015 – 2021 (as varied)

The extant statutory planning policy document for the subject sites is the Galway County Development Plan 2015-2021 (as varied) (GCDP).

The current Settlement Hierarchy includes a list of all key towns and larger villages and provides a population growth allocation for each for the period 2015 to 2021. Oughterard is on the fifth tier of the settlement hierarchy (Other Villages) with a total population allocation of 245 people under the Core Strategy, which is equivalent to a housing land requirement of 7.1 hectares. Taking an average household size of 2.4 (as referred to in the section 2.4.11 of the GCDP), the growth allocation requires approximately 100 no. new housing units up to 2021.

The GCDP sets out **Objective UHO 10** (Sequential Development) which states that, in order to promote the orderly and phased development of residential development, there is a positive presumption in favour of the sequential development of suitably serviced Residential (Phase 1) zoned lands whereas Residential (Phase 2) lands will normally only be considered when 50% of the lands in Residential Phase 1 are committed to development. In the context of Oughterard, there are currently 5 no. extant units of R1 lands and 0 no. R2 sites.

The above policy provisions for Oughterard provide important background context when considering the next iteration of Core, Settlement and Housing Strategies proposed within the DCDP, and furthermore, an useful baseline when determining whether the proposed zoning provisions provide an adequate reserve of residential zoned land to accommodate future growth scenarios for the town.

## 2.3.2 Draft Galway County Development Plan 2022 – 2028

The draft policies and objectives set out within the DCDP have maintained strong linkages with the key aims and themes within the extant GCDP with regard to supporting the continued growth of Oughterard in a plan-led and sustainable manner.

The DCDP emphasises that the spatial approach to sustainably developing Co. Galway must be plan-led, directing residential generating development to locations in accordance with national and regional policy and with environmental carrying capacity. The DCDP’s Core Strategy aims to strengthen the built fabric of the county’s existing urban settlement network whilst protecting and supporting the population of the more rural regions. Relevant to Oughterard, a key focus of the Core Strategy is to ‘*Support the Small Growth Towns and Small Growth Villages as areas for local services, residential and employment potential*’. The DCDP defines ‘Small Growth Towns’ as,

*“Small Towns with local service and employment potential. There is a need to promote regeneration and revitalisation of towns and support local enterprise and employment opportunities to ensure their viability as service centres for surrounding rural areas”*

Oughterard, as a ‘Small Growth Town’, will have the important function of supporting the development of the surrounding environs through localised sustainable growth that meets the needs of the local population and wider hinterland. Oughterard already serves a large rural catchment area stretching further westwards towards Clifden and eastwards in the direction of Maigh Cuilinn due to its existing level of local services, employment and residential stock. As referenced within the DCDP, and further expanded upon within ‘Small Growth Towns – Volume 2’, the future growth of Oughterard will require further investment in economic, employment-related and residential development in line with the following draft policy objectives:

- **Draft Policy Objective SS5** (Small Growth Towns (Level 5)): Protect and strengthen the economic diversity of the Small Growth Towns enabling them to perform important retail, service, amenity, residential and community functions for the local population and rural hinterlands
- **Draft Policy Objective OSGT2** (Sustainable Residential Communities): Promote the development of appropriate and serviced lands to provide for high quality, well laid out and well landscaped sustainable residential communities with an appropriate mix of housing types and densities, together with complementary land uses such as community facilities, local services and public transport facilities, to serve the residential population of Oughterard settlement plan. Protect existing residential amenities and facilitate compatible and appropriately designed new infill development, in accordance with the proper planning and sustainable development of the plan area. Specifically encourage living over the shop which can contribute to the vitality of the core and extend activity beyond business hours

As indicated by the above policies, a fundamental requirement for sustainable and long-term economic development, including provisions for facilitating remote working, is the delivery of services and infrastructure, including the appropriate zoning of residential land. The provision of housing will be implemented in accordance with following strategic aims, which are considered relevant to the requested re-zoning of the subject sites (underlined for emphasis in the context of this representation):

- To promote town and village centre living in a high-quality environment with good connectivity and access to local services;
- To reinforce the vitality and future of urban and rural settlements and recognise the role that they play in a wider social and economic context; and
- Prioritise the location of housing in existing settlements and in accordance with the Core Strategy as a means to maximising a better quality of life for people through accessing services, ensuring a more efficient use of land and allowing for greater integration with existing infrastructure

Against this backdrop, the subject sites and their requested re-zoning to Residential (Phase 2), e.g. Sites A, C and D, are considered compliant with the strategic aims of the DCDP with regard to connectivity to the town centre, community facilities, access to major transportation routes and support of the future growth of Oughterard as strategically positioned reserve landbanks.

### 3. SEQUENTIAL APPROACH TO OUGHTERARD’S RESIDENTIAL (PHASE 2) RESERVE

The DCDP’s Core Strategy Table (Table 2.9) sets out the population projection for Oughterard over the lifetime of the plan at 350 persons (2022-2028) with the quantum of residential lands required as 8.75 hectares, as shown below in Table 3.

Table 3. Core Strategy Oughterard – Comparative View of GCDP and DCDP

County Development Plan	Settlement Typology	Settlement	Pop. CSO 2016	Core Strategy 2022 - 2028 Population Allocation	Housing Units	Density	Housing Land Requirement (ha)	Up to 30% of Residential Units into Built Up Footprint
GCDP	Other Village	Oughterard	1,318	245	100	-	7.1	-
DCDP	Small Growth Town		1,318	350	140	16	8.75	42.00

Source: Draft Galway County Development Plan 2022 – 2028 (Table 2.9)

As shown above, the Keogh Family support Galway County Council’s decision to build-upon the targets previously identified for Oughterard in the GCDP (2015 – 2021) as it indicates a clear acknowledgement that Oughterard is in a position for further growth and to develop at both a local level (e.g. services) and broader regional level with regard to its role in supporting the more rural hinterland. By applying the projected population growth for County Galway within the lifetime of this plan and the identification of the relevant tiers of the settlement hierarchy (as per Table 1), Galway County Council has zoned ‘Residential (Phase 1)’ and ‘Residential (Phase 2)’ within each settlement in order to deliver new homes to meet growing populations.

- **Residential (Phase 1):** To protect, provide and improve residential amenity areas within the lifetime of this plan - 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.
- **Residential (Phase 2):** To protect, provide and improve residential amenity areas - 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

In the context of Oughterard, a need of 140 no. housing units (8.75ha) has been identified which, at a local site specific level, has been translated into 4 no. distinct Residential (Phase 1) sites (total 7.56ha) and 2 no. Residential (Phase 2) sites (total 1.8ha). It is important to highlight that the total 7.56ha for Residential (Phase 1) land is below the quantum identified for Oughterard’s housing requirement, which does not consider the inherent challenges and site-level constraints which can impede the successful delivery of residential development. It is therefore reasonable to assume that identified Residential (Phase 2) land could feasibly be developed over the lifetime of the plan as per **Draft Policy Objective SGT1** (Residential Development Phasing) (emphasis underlined):

*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:*

- 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, 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.

Another relevant consideration relating to the 2 no. identified Residential (Phase 2) land parcels concerns flexibility and choice. Due to the small quantity of reserve land currently proposed for Oughterard (c. 1.8ha), there is limited recourse for Galway County Council to manage the growth of the town over the next 6 no. years in a plan-led manner if one of these 2 no. sites becomes unavailable / unsuitable for residential development. Without having a sufficient quantity of Residential (Phase 2) land in place for the lifetime of the plan, there is an increased risk that,

- 1) planning applications for residential development are prepared for available lands rather than properly zoned lands, which ultimately impedes the successful implementation of the DCDP,
- 2) potentially viable sites are lost if prospective applicants do not want to risk resources in applying for planning for un-zoned land, and
- 3) less suitable sites are brought forward due to the absence of alternatives (e.g. informed choice).

As there is no competition between the development of Residential (Phase 1) and Residential (Phase 2) lands by virtue of their operational roles within spatial planning, there is no risk associated with supplementing Oughterard’s reserve Residential (Phase 2) lands as it only provides greater certainty in how the town may develop over the next 6+ years. Drawing again on draft policy objective SGT1, the sequential approach is further considered in the context of identifying appropriate land folios for Residential (Phase 2) zoning.

## 3.1 Sequential Approach

The *Sustainable Residential Development in Urban Areas (Cities, Towns and Villages)* Guidelines seek to inform the core principles of urban design when designing places of high quality and distinct identity. The Guidelines recommend that planning authorities adopt a sequential and coordinated approach to zoning lands for development within county development plans in order avoid a ‘haphazard and costly approach’ to the provision of social and physical infrastructure. This ‘Sequential Approach’, as originally set out within the Development Plan Guidelines (DoEHLG, 2007), identifies 3 no. steps in identifying and zoning potential lands for development within the footprint of settlements:

1. Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. ‘leapfrogging’ to more remote areas should be avoided);

2. A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and
3. Areas to be zoned should be contiguous to existing zoned development lands

We believe that the above criteria are relevant and material to the zoning of Residential (Phase 2) lands in Oughterard, and accordingly, the sequential approach is discussed in the context of the requested zoning of Sites A, C and D below.

### 3.1.1 Proximity to Town Centre & Connectivity

The subject Sites A, C and D are located within the settlement boundary of Oughterard, c. 550m – 750m east of the town centre, as shown below in Figure 2. At present, Oughterard is supported by a number of community facilities and services which include local shops, recreation and sport facilities, health, education and religious institutions, B&Bs and natural amenity areas, all of which are located within or proximate to the town centre. In comparison to the currently proposed Residential (Phase 2) sites, 1A and 2A, the relative distances between the subject sites to the town centre are generally the same.

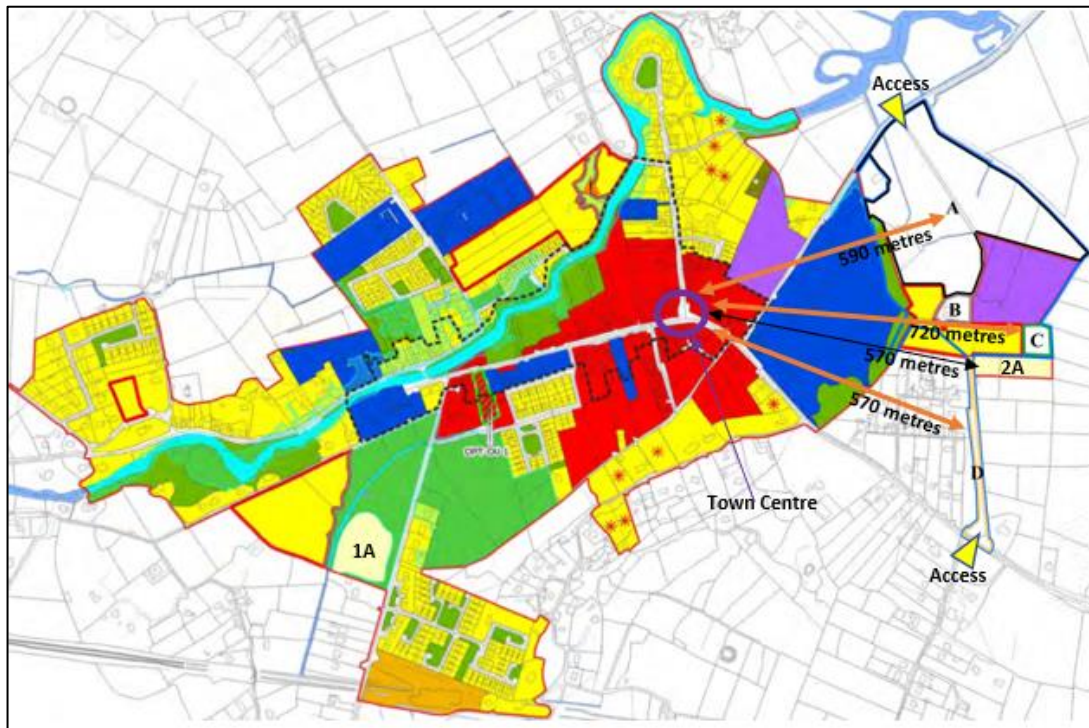


Figure 2. Oughterard – Residential (Phase 1) Zonings  
 Source: Draft Galway County Development Plan 2022 – 2028 (Volume 2 – Small Growth Towns)

The subject sites benefit from 2 no. existing vehicular entrances, one at the northern extent of Site A (Pier Road – L5334) and another to the south via Site D (an existing track to the N59). In terms of public transportation, there are five scheduled daily bus services (Monday – Friday) provided by Bus Eireann to and from Oughterard. In this regard, the subject sites have the necessary infrastructure in place to accommodate private vehicles for travelling outside of Oughterard whilst also benefiting from clear linkages to the town centre and public transportation options.

Site D offers the opportunity to provide direct connectivity between the N59 and the Pier Road (L5334). Presently, vehicles and pedestrians arriving to Oughterard from Galway must travel via the N59 to the town centre in order to then travel north. Site D represent an opportunity to provide an alternative vehicular link between the N59 and the Pier Road (L5334) thus bypassing the need to travel through the centre if heading to the north / northeast. The development of Site D as a formal access route would ensure that the existing gateway, previously associated with the original O’Flaherty estate and classified as a Protected Structure (RPS No. 663) by both the GCDP and DCDP, is appropriately incorporated,

and protected, as part of the development. The opportunity to utilise Site D would facilitate greater protection of this protected structure by way of active management and upkeep thus limiting the risk of future disrepair.

The eastern and western extents of the subject sites are developed with one-off dwellings to the west, medium density residential development to the south and recreational / amenity infrastructure to the southwest (GAA pitches). As indicated by the location of the subject sites in the context of the town centre, existing residential dwellings and the proximity of Residential (Phase 1) and Residential (Phase 2) lands, it is reasonable to assume that all main services, e.g. water, electricity, telecoms etc., can be extended into these sites without significant difficulty.

### 3.1.2 Current Utilisation

The subject sites are classified as predominantly agricultural pastureland (2018 Corrine Land Cover database); however, aerial imagery indicates that the majority of the northern / western site interior of Site A comprises woodland with the southern / eastern extents pastoral in nature. Tributary streams / drainage channels discharging to the Owenriff River extend within the northern extent of Site A. As noted above, Site D comprises c. 300m track connecting the subject sites to the N59. The only planning history associated with the subject sites relate to an existing residential dwelling located immediately adjacent to the northern extent of Site A and the existing dwelling located in Site B. Due to the absence of development within the subject site over the last 20+ years, it is considered relevant to refer to the Oughterard Local Area Plan (LAP) 2006-2012 with regard to the previous proposed uses of these sites.

While the Oughterard Local Area Plan (LAP) 2006-2012 has been expired for several years, the Plan’s Land Use Zoning Objective Map (Map 1) establishes an important precedence for the requested rezoning of Residential (Phase 2) for the Sites A, C and D and Residential (Existing) for Site B. As shown below in Figure 3, the archived Oughterard LAP 2006-2012 predominantly zones the subject sites as ‘Residential’. It should be noted that the land-use zonings requested are broadly in accordance with these previous plans and do not request anything significantly different from what has previously been implemented by Galway County Council for Oughterard.

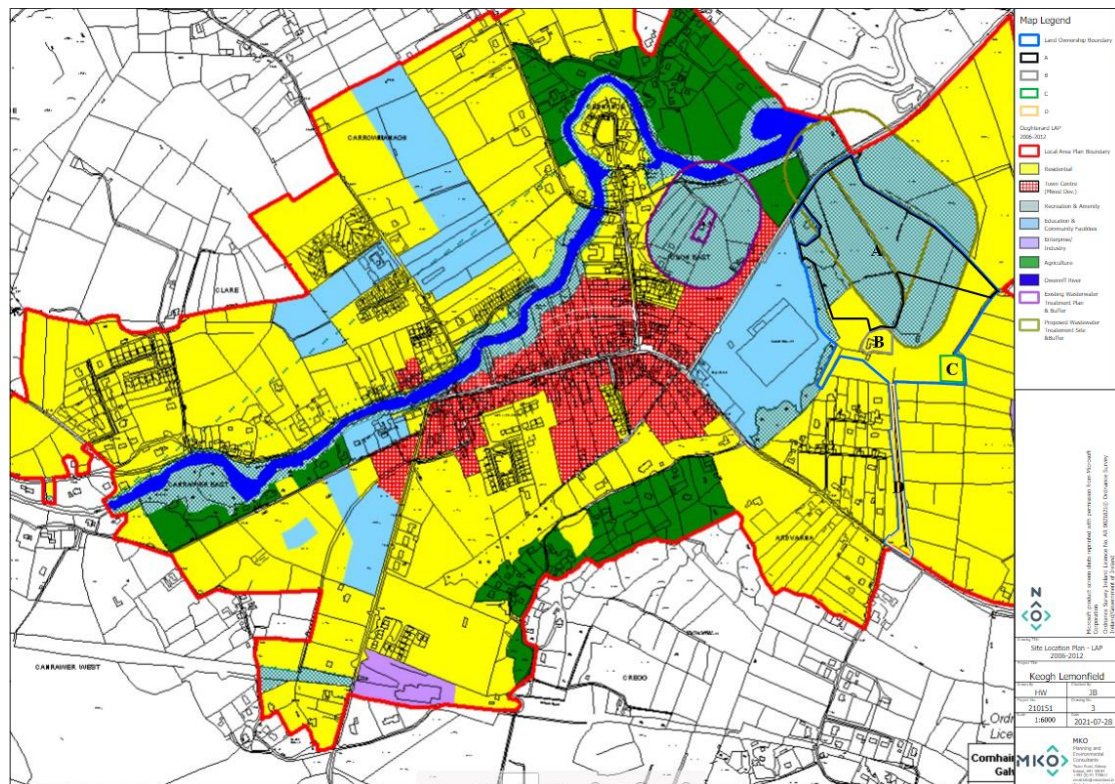


Figure 3. Oughterard Land Use Zoning Objectives Map (2006-2012) – Subject Sites

Source: Oughterard Local Area Plan 2006 – 2012 (Expired)

As shown above in Figure 3, the northern extent of Site A was previously zoned for ‘Recreation and Amenity’. It is important to highlight that a large proportion of the site was, at the time of preparing this plan, identified as a potential location for a new wastewater treatment plant (WWTP). Due to this uncertainty as to where the WWTP may be located, lands comprising Site A were effectively sterilised for residential development and ‘Recreational and Amenity’ land-use was subsequently the most compatible use in this context. It was ultimately decided not to locate the upgraded Oughterard WWTP (p.e. 3,000) within the boundary of Site A and an alternative site was selected.

These historic land-use zonings indicate that the subject sites are suitable, and previously considered acceptable by Galway County Council, for residential development (in principle). Furthermore, it should also be noted that there have been no material changes to these sites or their immediate surroundings since this plan was adopted in 2006, such as new development, which would now make these zonings incompatible with the proper and sustainable development of Oughterard. In the context of Site A, it is reasonable to note that the zoning of Residential (Phase 2) is now even more appropriate as the upgraded Oughterard WWTP is constructed, operational and no longer a burden on the development potential of the lands. Notwithstanding, flood risk is a material consideration for Site A.

The Planning System and Flood Risk Management Guidelines (PSFRMG) were published by the Minister for the Environment, Heritage & Local Government in November 2009 under Section 28 of the Planning & Development Act 2000 (as amended). The purpose of the Guidelines is to introduce “comprehensive mechanisms for the incorporation of flood risk identification, assessment and management into the planning process.” The document goes on to state that:

*“Planning authorities will ensure that only developments consistent with the overall policy and technical approaches of these Guidelines will be approved and permission will be refused where flood issues have not been, or cannot be, addressed successfully and where the presence of unacceptable residual flood risks to the development, its occupants or users and adjoining property remains.”*

Oughterard is built on the banks of the Owenriff River with the Main Street, a linear settlement pattern, developing in an easterly direction. The Owenriff River has historically flooded its banks, and consequently, flood risk is a well-known and identified constraint for securing new residential development within the town. In this regard, Small Growth Towns (Volume 2) sets out draft policy objective **OSGT10** (Inappropriate Development on Flood Zones) which identifies relevant criteria for assessing development / land use within flood zones. As shown in Appendix 1 – Map 2, the OPW’s Catchment Flood Risk Assessment and Management (CFRAM) study indicates that the entire northern extent of Site A and the lands immediate adjacent to the on-site tributary streams / drainage channels are designated as Flood Zone A (10% AEP (1 in 10 year chance)) and Flood Zone B (1% AEP (1 in 100 year chance)). The remainder of the site is predominantly Flood Zone C (1 in 1000 year chance). The proposed Residential (Phase 2) zoning has avoided both Flood Zones A and B within Site A as shown below in Figure 4.

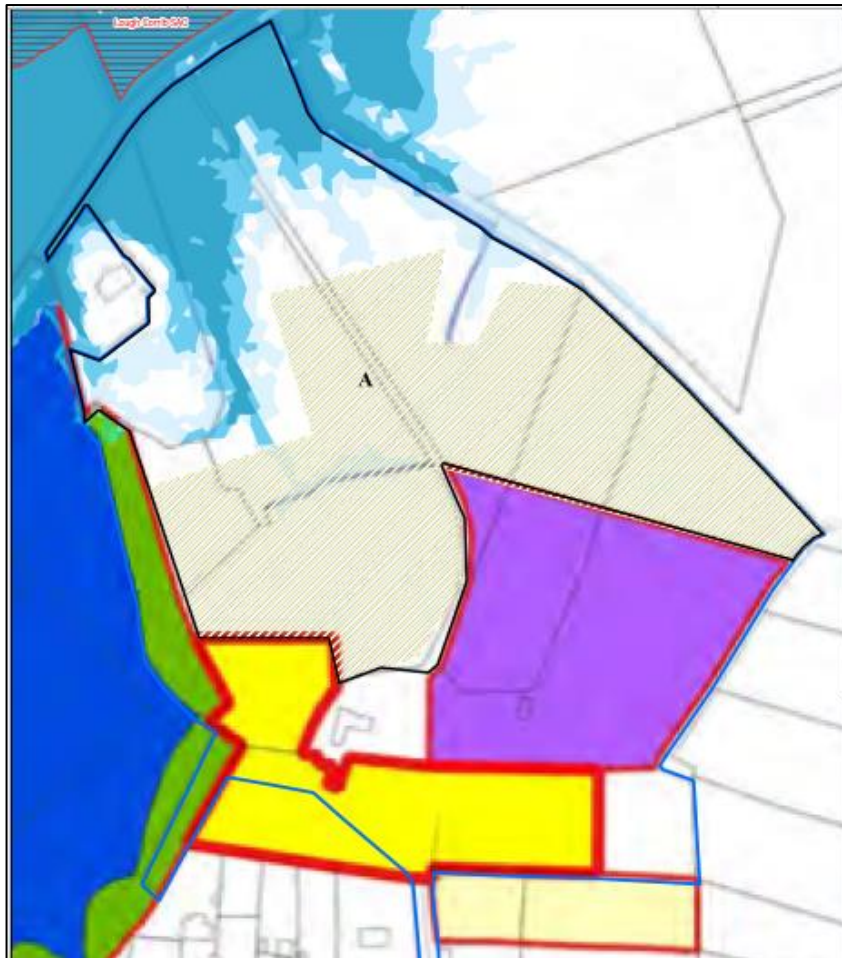


Figure 4. Site A – Requested Re-Zoning to Residential (Phase 2)  
 Note: Please refer to Appendix 1 – Map 4

In summary, the absence of any development within these sites over the last 20+ years, and more so, the eastern extent of Oughterard, would indicate a general level of under-utilisation of these lands. The efficient and sustainable utilisation of viable land is a key consideration when determining residential zoning, which in the case of the subject sites, is wholly appropriate. While it is acknowledged that reliance on the Oughterard LAP 2006-2012 should be limited in the context of the GDCP and emerging DCDP, the Keogh Family believe that the previous land-use zonings are beneficial in demonstrating that the subject sites are currently under-utilised and have the capacity to support future residential development, where needed / required, as Residential (Phase 2) lands.

### 3.1.3 Contiguity of Proposed Land-Use Zoning

The requested re-zoning of Sites A, C and D as Residential (Phase 2) and Site B as Residential (Existing) would result in a contiguous block of residential development thus facilitating compact growth as required under **Draft Policy Objective CGR1** (Compact Growth):

*“To require that all new development represents an efficient use of land and supports national policy objectives to achieve compact growth in towns and villages. Development of lands with no links to the town or village centre will be discouraged.”*

By strategically zoning Sites A, C and D as part of Oughterard’s Residential (Phase 2) reserve, these sites can support the future development of adjacent Residential (Phase 1) land with regard to providing a justifiable basis to invest in enabling infrastructure, services and supporting amenities in addition to existing access infrastructure (Site D). In particular, Site C can augment either the Residential (Phase 1) site or the Residential (Phase 2) site with regard to supporting potentially larger development proposals

which require additional land not currently zoned for. As such, this request for the re-zoning of these sites will not facilitate ‘leap-frog’ development as they are strategically located adjacent to currently proposed residential zonings.

It is also worth noting that there are two significant parcels of land proposed as Community Facilities / Open Space – Recreational & Amenity and Tourism to the west and the east of the subject sites, respectively. In line with the overall sequential approach to residential zoning, the future development of these two sites would be significantly advantageous to, and complementary of, future residential development at this general location. Whilst the town centre remains within short walking distance, the provision of community and amenity facilities and recreational infrastructure along the periphery of Sites A and C has potential to transform east Oughterard into a strategic residential and community location. The securement of additional reserve Residential (Phase 2) land at the subject sites would be in line with the overall place-making objectives of Galway County Council.

### 3.2 Justification of Requested Land Use Re-Zonings

Tables 4 – 7 below provide a summary overview of requested re-zonings of the subject sites in order to provide Galway County Council a concise justification for each request. It should again be emphasised that these site are independent of each other and the re-zoning of a specific site is not dependent on the entirety of the requested zonings being adopted. Notwithstanding, the full adoption of these requests by the Council would strengthen both the individual and complementary strengths that these sites offer to the future development of Oughterard.

Table 4. Site A – Residential (Phase 2) Justification Summary

Current Zoning	Planning History	Evidence of Environmental Constraints	Proximity / Connectivity	Current Utilisation	Contiguity of Land-Use Zoning
<p><b>Unzoned</b> – Previously benefited from ‘Residential’ and ‘Recreation and Amenity’ under the Oughterard LAP. There have been no material changes to the sites (e.g. new development), or their immediate surroundings, since 2006 which would make these previous zonings incompatible with the proper and sustainable development of Oughterard.</p>	<p>PI Ref. 00/893: Conversion of the attic to bedrooms and en-suites – <b>Granted (28.04.2000)</b></p> <p>PI Ref. 13/826: Retention of dwelling house and septic tank as constructed – <b>Granted (28.10.2013)</b></p> <p>Neither application directly relates to Site A in the context of the requested zoning</p>	<p>The OPW’s CFRAM study indicates that the entire northern extent of the site and the lands immediate adjacent to the on-site tributary streams / drainage channels are designated as 10% AEP (1 in 10 year chance) and 1% AEP (1 in 100 year chance) for flood risk, Flood Zones A and B. The remainder of the site is predominantly Flood Zone C (1 in 1000 year chance). The proposed Residential (Phase 2) zoning has avoided both Flood Zones A and B.</p> <p>The Owenriff River is c. 100m north of the subject site and is physically separated from the lands by the Pier Road and embankments, vegetation and intervening pastural lands. Available mapping indicates tributary streams / drainage within the subject site which may provide hydrological connectivity to the Owenriff River. The Owenriff River in part comprises the Lough Corrib SAC and SPA. The proposed Residential (Phase 2) zoning has ensured an adequate distance from the Owenriff River such that potential</p>	<p>c. 590m from Oughterard town centre</p> <p>2 no. available access points to the public road network</p>	<p>Agricultural (Pastoral)</p> <p>No development over the last 20+ years</p>	<p>East of Community Facilities and Open Space/Recreation and Amenity</p> <p>West of Tourism</p> <p>North of Residential (Phase 1)</p>

Current Zoning	Planning History	Evidence of Environmental Constraints	Proximity / Connectivity	Current Utilisation	Contiguity of Land-Use Zoning
		<p>connectivity of the site to the surrounding European designations can be adequately managed as part of a future planning application.</p> <p>There are also no recorded archaeological sites or national monuments on the lands or in the immediate vicinity</p>			

Table 5. Site B – Residential (Existing) Justification Summary


Current Zoning	Planning History	Evidence of Environmental Constraints	Proximity / Connectivity	Current Utilisation	Contiguity of Land-Use Zoning
<p><b>Unzoned</b> – Previously benefited from ‘Residential’ under the Oughterard LAP. There have been no material changes to the sites (e.g. new development), or their immediate surroundings, since 2006 which would make this previous zonings incompatible</p>	<p>Pl Ref. 21/49 – No documents available but photographic / document evidence clearly show the presence of an existing residential dwelling</p> 	<p>There are no site-specific constraints associated with the site. The lands are not prone to fluvial flooding and are not the subject of any ecological designations. There are also no recorded archaeological sites or national monuments on the lands or in the immediate vicinity</p>	N/A	Existing Dwelling	<p>East / North of Residential (Phase 1)</p> <p>West of Tourism</p>

Table 6. Site C – Residential (Phase 2) Justification Summary

Current Zoning	Planning History	Evidence of Environmental Constraints	Proximity / Connectivity	Current Utilisation	Contiguity of Land-Use Zoning
<p><b>Unzoned</b> – Previously benefited from ‘Residential’ under the Oughterard LAP. There have been no material changes to the sites (e.g. new development), or their immediate surroundings, since 2006 which would make this previous zonings incompatible</p>	N/A	<p>There are no site-specific constraints associated with the site. The lands are not prone to fluvial flooding and are not the subject of any ecological designations. There are also no recorded archaeological sites or national monuments on the lands or in the immediate vicinity</p>	<p>c. 720m from Oughterard town centre</p> <p>2 no. available access points to the public road network</p>	<p>Agricultural (Pastoral)</p> <p>No development over the last 20+ years</p>	<p>South of Tourism</p> <p>West of Residential (Phase 1)</p> <p>North of Residential (Phase 2)</p>

Table 7. Site D – Residential (Phase 2) Justification Summary

Current Zoning	Planning History	Evidence of Environmental Constraints	Proximity / Connectivity	Current Utilisation	Contiguity of Land-Use Zoning
<p><b>Unzoned</b> – Previously benefited from ‘Residential’</p>	N/A	<p>There are no site-specific constraints associated with the site. The lands are not prone to fluvial flooding</p>	c. 570m from Oughterard town centre	Existing access track (wayleave)	South of Residential (Phase 1) and

Current Zoning	Planning History	Evidence of Environmental Constraints	Proximity / Connectivity	Current Utilisation	Contiguity of Land-Use Zoning
<p>under the Oughterard LAP. There have been no material changes to the sites (e.g. new development), or their immediate surroundings, since 2006 which would make this previous zonings incompatible</p> <p>It should be emphasised that the primary purpose of this site is to provide a direct southern access route to the N59 for both Sites A, B and C and the proposed Residential (Phase 1) and (Phase 2) sites.</p>		<p>and are not the subject of any ecological designations. There are also no recorded archaeological sites or national monuments on the lands or in the immediate vicinity</p> <p>Protected Structure (RPS No. 663 – gateway entrance associated with the original O’Flaherty estate) is located within the boundary of the site. The opportunity to utilise Site D would facilitate greater protection of this protected structure by way of active management and upkeep thus limiting the risk of future disrepair.</p>	<p>An opportunity to provide an alternative vehicular link between the N59 and the Pier Road (L5334) thus bypassing the need to travel through the centre if heading to the north / northeast.</p>		<p>Residential (Phase 2)</p>

As demonstrated within this representation, it is our opinion that Sites A, C and D satisfy the criteria set out within the sequential approach for the zoning of residential lands and are compliant with the statutory planning provisions underpinning the Draft Galway County Development Plan 2022 - 2028. These sites are strategically positioned within the footprint of Oughterard, e.g. connectivity to the town centre and community facilities, proximate to recreational and amenity lands, accessible to major transportation routes, currently under-utilised and contiguous with other residential and applicable land-use zonings, which would inherently support the zoning of Residential (Phase 2) over the lifetime of the plan. The inclusion of these re-zonings will augment the existing quantum of Residential (Phase 2) lands identified for Oughterard whilst also safeguarding the subject sites for future development.

## 4. CONCLUSION

In consideration of the various strengths of Oughterard and the extant physical infrastructure and facilities already established within the town, the Keogh Family strongly encourages Galway County Council to adopt a proactive approach to the future development of Oughterard and maximise the town's reserve Residential (Phase 2) landbank. As such, it is requested that Galway County Council re-zone the following land parcels, which in part comprise the Keogh Family's Folio No. GY52270, at Lemonfield townland, Oughterard, Co. Galway:

- > Site A - Requested Zoning as Residential (Phase 2)
- > Site B - Requested Zoning as Residential (Existing)
- > Site C - Requested Zoning as Residential (Phase 2)
- > Site D - Requested Zoning as Residential (Phase 2)

As demonstrated within this representation, the subject sites and their requested re-zoning to Residential (Phase 2), e.g. Sites A, C and D, and Residential (Existing), Site B, are compliant with the strategic aims and objectives of the National Planning Framework, Northern and Western Regional Spatial Economic Strategy and the emerging Galway County Development Plan and, if adopted, will ensure that there is an adequate reserve of land within Oughterard to accommodate any future growth scenario.

The Keogh Family welcomes the opportunity to comment on the Draft Galway County Development Plan 2022-2028 in order to assist in shaping the future of Oughterard.



## **APPENDIX 1**

**LAND-USE MAPPING FOR  
REQUESTED ZONING OF  
SUBJECT SITES**