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The Planning Department
Galway County Council
Áras an Chontae
Prospect Hill
Galway

30th July 2021

Re: Submission to Draft Galway County Development Plan 2022-2028

On behalf of: Mr. Gabriel Bermingham

Dear Sir/Madam,

This is a submission by KPMG Future Analytics, Stokes Place, St. Stephen's Green, Dublin 2 (Chartered Town Planning and Development Consultants), on behalf of Mr. Gabriel Bermingham of [REDACTED], in relation to the Draft Galway County Development Plan 2022-2028.

Our client welcomes the opportunity to engage with the Planning Authority in the preparation of the upcoming Development Plan and contributing to the sustainable growth and development of the County over the Plan period.

Background

The purpose of this submission is to firstly provide the Planning Authority with a locational context of our client's lands by identifying their strategic position within close proximity to the Kinvara village centre in an established residential setting. The submission will then focus on a review of the relevant sections of the Draft Galway County Development Plan 2022-2028 and demonstrate the merit of the **minor extension of the Kinvara Settlement boundary to include the subject site and the resultant zoning of the lands as R- Residential (Phase 1)**.

This submission will aim to establish how the subject site, due to its location and proximity to existing residential areas, services and amenities coupled with Kinvara's strong accessibility and connections to surrounding settlements, is suitable for future housing provision and has the potential to deliver high quality and sustainable housing to meet projected population growth of the settlement over the lifetime of the plan.

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The Site

Kinvara is located on the National Primary Road (N67) and is approximately a 13-minute drive to the M18 motorway that connects Gort and Tuam. Kinvara is also well-served by a regular bus service between Galway and North Clare throughout each day. The village is accessible with strong links to the surrounding settlements.

The subject site is greenfield in nature and rectangular in shape, with an area of approximately 2.19 ha. The site is bound to the west and north by green fields currently in use for agriculture and to the east by a single one off dwelling house and another currently under construction. To the south of the lands lies four single houses bordering a new residential development comprising 27 no. dwellings (Permitted under Reg. Ref. No. 19/52) and will be known as 'Rinn na Mara'. This is currently under construction by a local house builder with whom the owner of the subject lands has collaborated on site development in the past. The site is further bound to the south east by the existing residential development 'Nuns Orchard'. A further residential scheme sits to the west of 'Rinn na Mara', known as 'Ard an Mhuilinn'.



Figure 1: Aerial View of the Subject Site

The subject site is located approximately 700m to the north-west of Kinvara village centre as shown in Figure 2 below and is within walking distance from a range of services and amenities including a supermarket, local school, bars, restaurants and a host of other services and facilities. The site is also located approximately 500m (c. 6 minute walk) from the Regional Bus Service Route 350: Galway – Kinvara – Doolin – Ennis and is also served by the national road N67 to Galway (c. 36 minute drive) to the north and Doolin (c. 44 minute drive) and Lahinch (c. 46 minute drive) to the south.

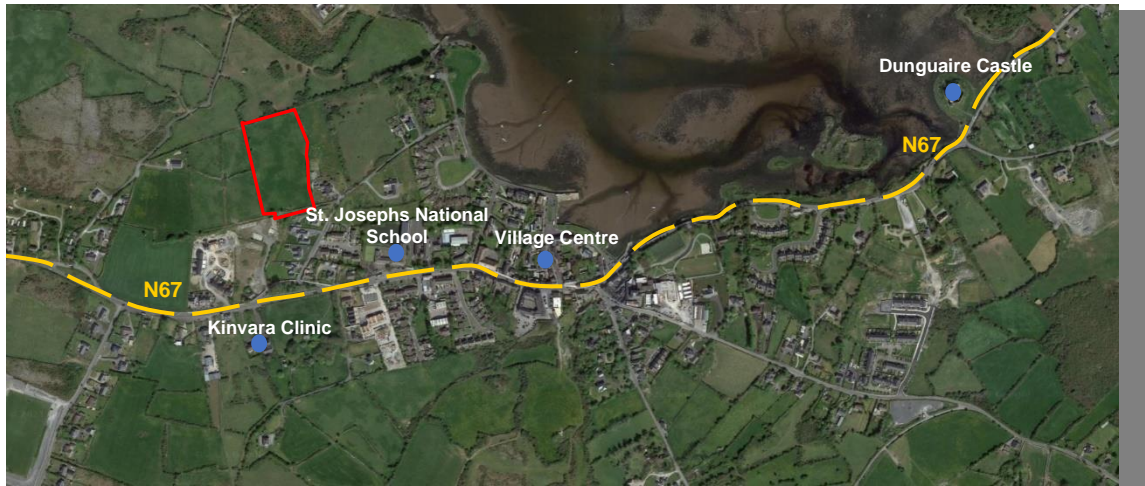


Figure 2: Site Context Aerial View (Subject Site Outlined in Red).

Land Use Zoning

Volume 2 of the Draft Galway County Development Plan 2022-2028 provides the land use zoning maps for the administrative boundary of the County. Under the Draft Plan the subject site is currently not included within the Kinvara settlement boundary and therefore is not ascribed a specific zoning class and is consequently considered rural. Under the Rural Housing Development Strategy 2022-2028 set in the Draft Plan, the subject site is located within Rural Housing Zone 4: Landscape Sensitivity 2,3 and 4. The Policy Objective relating to these areas is set out below:

“RH 4 Rural Housing Zone 4 (Landscape Classification 2,3 and 4): Those applicants seeking to construct individual houses in the open countryside in areas located in Landscape Classification 2,3 and 4 are required to demonstrate their demonstrable economic or social Rural Links* and where they have spent a substantial, continuous part of their lives i.e have grown up in the area, schooled in the area and have immediate family connections in the area e.g son or daughter of longstanding residents of the area and require to establish a Substantiated Rural Housing Need*. In addition, an Applicant maybe required to submit a visual impact assessment of their development, where the proposal is in an area identified as “Focal Points/Views” in the Landscape Character Assessment of the County or in Class 3 and Class 4 designated landscape areas. Documentary evidence shall be submitted to the Planning Authority to justify the proposed development and will be assessed on a case by case basis. An Enurement condition shall apply for a period of 7 years, after the date that the house is first occupied by the person or persons to whom the enurement clause applies.”

This classification of rural zoning restricts multi-unit developments. As can be seen from the above, this rural zoning caters for applicants seeking to construct an individual house in the open countryside, who must demonstrate economic or social Rural Links and have spent a substantial, continuous part of their life in the area.

The purpose of this submission is to demonstrate to Galway County Council the merit of the **inclusion of the subject site into the Kinvara Settlement boundary and the zoning of the subject site as R- Residential (Phase 1).**

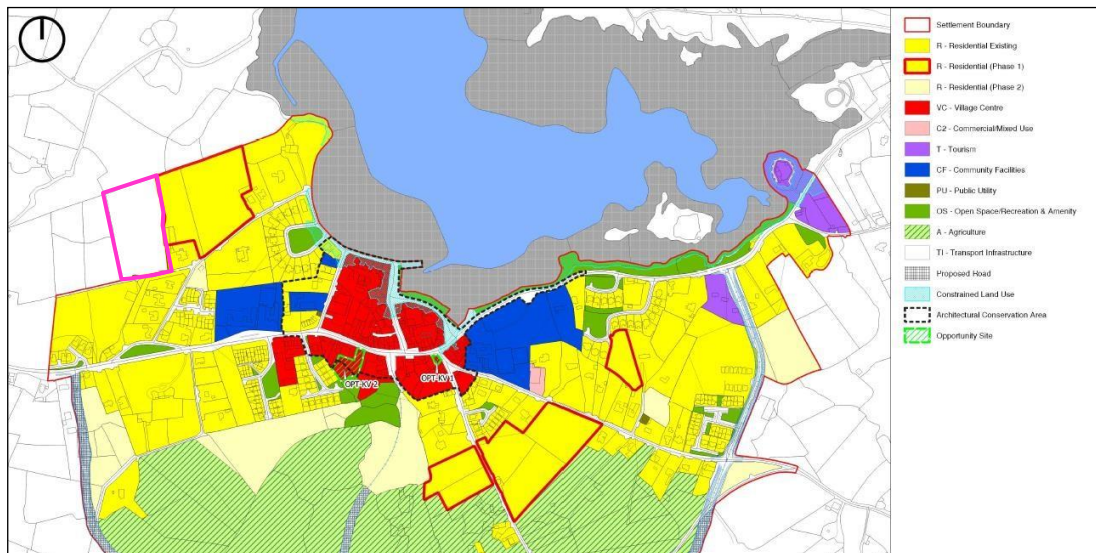


Figure 3: Land Use Zoning under Draft Galway County Development Plan 2022-2028 (Subject Site Outlined in Pink)

As can be seen by comparing the zoning objectives of the Draft Galway County Development Plan 2022-2028 and the Kinvara LAP 2005-2011, there has been a substantial dezoning of RResidential (Phase 1) lands under the Draft Plan. The subject site presents an ample and viable opportunity to increase the quantum of Phase 1 residential lands to meet the growing demand for housing in the area. The subject site is bound by a future housing development that is currently under construction by a local housing builder while the adjoining site to the east is vacant with no imminent plans for redevelopment. This results in the practical reality on the ground that our client's lands will be positioned within an established residential setting in the near term with direct access to the village core and associated infrastructure and facilities therein. Allowing this site to remain unzoned will effectively result in its sterilisation and will impede upon the Authority's objectives of achieving compact growth. The inclusion of the subject site as Phase 1 residential lands represents the logical extension and consolidation of the existing residential character of the immediate locality with the ability to deliver high quality sustainable housing in the near future.

The Kinvara LAP designated approximately 33.5 ha of land for Residential Phase 1. This has been reduced to 7.27ha under the Draft Plan. It is our client's respectful submission by reducing the quantum of phase 1 lands to such an extent the Authority are effectively only providing limited opportunity for residential development on a small number of lands. There is reasonable doubt as to the feasibility of the development of some of these proposed Phase 1 lands, and a willingness of some of the owners of these Phase 1 lands to bring them forward in the timeframe of the Development Plan. It is our client's respectful submission that the Plan would benefit from a degree of optionality and flexibility through the allowance of sufficient headroom when identifying lands suitable for housing. This will ensure that the appropriate quantum of local housing can be delivered over the Plan period and subsequent years. It is also our client's belief that, if there is not a suitable quantum of Phase 1 development land available, the price of housing in the area could increase and this could effectively prevent affordable housing from being achievable. It is imperative that lands bounding proposed Phase 1 lands, such as the subject site, are considered in this context.

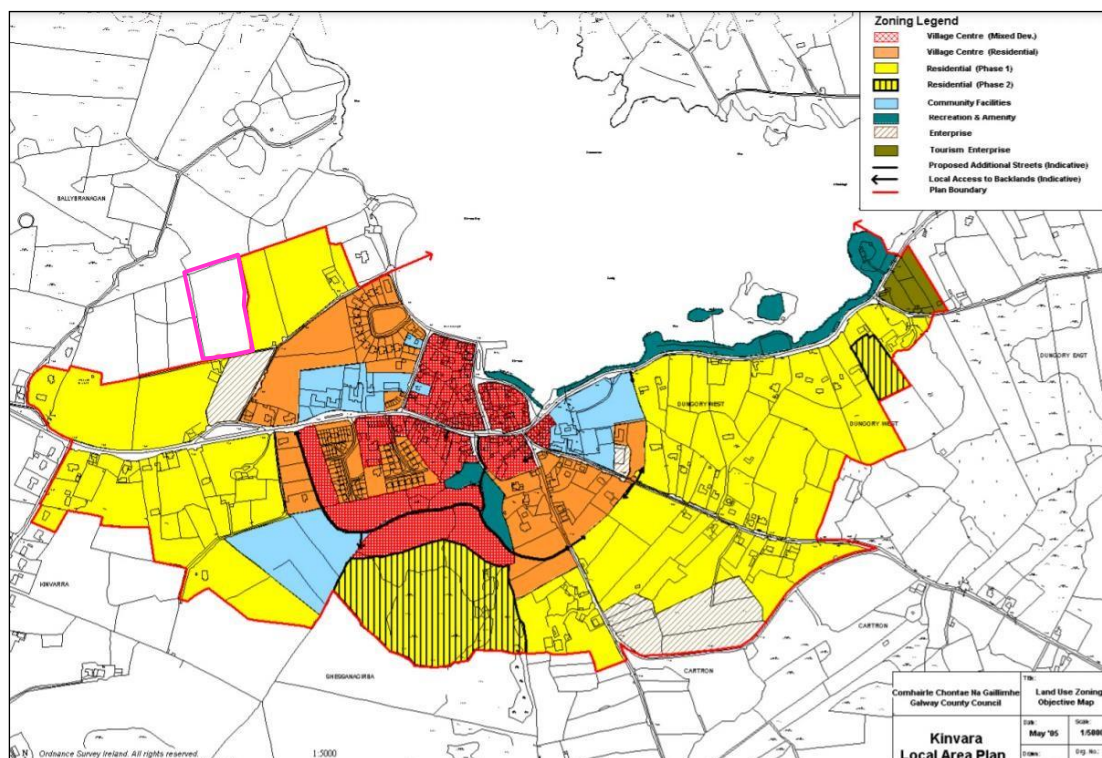


Figure 4: Land Use Zoning Under Kinvara LAP 2005-2011 (Subject Site Outlined in Pink)

The Draft Plan has identified a population growth of just 200 persons for the Kinvara settlement over the lifetime of the new Plan. In light of current trends resulting from the Covid-19 pandemic that has seen the prospect of remote working come to fruition, hybrid working models have reduced commuting requirements for work purposes. Due to the impact of this, there is a justification for an appropriate return on investment in local infrastructure and the creation of sustainable communities. The Housing Strategy and Housing Need Demand Assessment set out in Appendix 2 recognises that future revisions may be required due to the Covid-19 pandemic.

"It is important to note that the figures presented in the HNDA might require a future revision given the unprecedented circumstances for housing and employment brought forward by the COVID-19 pandemic, which continues to have a significant impact on individuals, society, businesses and the wider economy across the globe. Particular notice should be given to the COVID-19 related impacts, however as the broader economy recovers and responds to the pandemic, the overall economic and demographic climate will face a number of challenges but also see many new opportunities in the medium to long term."

As outlined above, neighbouring lands within our client's ownership are currently under construction by a local house builder with whom the owner of the subject lands has collaborated on site development in the past and will deliver 27 no. dwellings ('Rinn na Mara'). Based on the unit mix of this development, this new residential scheme has the capacity to generate c. 145 no. residents. It is understood and appreciated that some of these new residents will be currently residing in the Kinvara settlement, but it is anticipated that this residential scheme will also attract new residents from other settlements, therefore growing the population.

This development will potentially account for over half of the projected population increase in the area which demonstrates that the projected growth figure of 200 persons is modest at best and should be recalibrated having regard to current trends and demand for housing in the area. If it is Council's case that extant permissions and pipeline developments have been accounted for and that the 200 person population uplift is for future housing delivery not yet consented, it appears particularly limiting to enable Kinvara to grow sustainably and to have the population needed to make village centre investment, business viability (local services, local employment) and infrastructure maintenance more justifiable.

In this regard, additional reserve of Phase 1 lands will be required to accommodate a projected population growth that is more aligned to the current situation. It is therefore our client's respectful submission that the subject site, which is serviced, development ready and situated in an established residential setting is capable of delivering housing to meet demand. The rezoning of our client's lands will allow for more compact growth in line with National and Regional Policy Objectives.

Core Strategy and Settlement Strategy

As part of the Draft Galway County Development Plan, the Core Strategy, Settlement Strategy and Housing Strategy have been prepared and informed by the National Planning Framework (NPF), the Implementation Roadmap for the NPF, the Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region and Section 28 Ministerial Guidelines. Galway County Council have developed a vision for the County in terms of the Core Strategy as follows:

"The promotion of a balanced urban and rural county that ensures future growth is based on the principles of sustainable development, delivering a high quality living and working environment meeting the needs of all residents"

The Draft Plan aims to achieve compact growth through the delivery of new homes in urban areas within the existing built up footprint of settlements. Policy Objective CS 2 of the Draft Plan relates to the ambition of the Authority to achieve compact growth and states as follows:

"CS 2 Compact Growth: *To achieve compact growth through the delivery of new homes in urban areas within the existing built up footprint of settlements, by developing infill, brownfield and regeneration sites and prioritising underutilised land in preference to greenfield sites."*

Under the Draft Plan Kinvara is identified as a Level 6 Settlement- Small Growth Village. These settlements are small villages with local services and employment potential. Section 2.4.10 'Small Growth Village' describes these settlements as having an important function in supporting the development of local areas. The residential development in these settlements will be proportioned to the growth of the villages. The growth strategy of these settlements will focus on the localised sustainable growth that meets the needs of the local population and the wider rural hinterland.

"SS 6 Small Growth Villages (Level 6): *Protect the consolidation of Small Growth Villages in order to improve local employment, services, rural housing and sustainable transport options."*

The subject site is located within a built-up area of Kinvara and is positioned in an established residential setting that is continuing to grow. This is due to the existing residential areas of 'Ard An Mhuillin' and 'Nuns Orchard' and 'Rinn na Mara' which is currently under construction. Also, the neighbouring lands to the east have been zoned as R-Residential (Phase 1). It is considered that the inclusion of our client's lands within the settlement boundary of Kinvara represents a logical and coherent extension of the existing setting and will facilitate in meeting the objective of achieving compact growth through the provision of residential development.

Rural Living & Development

Chapter 4 of the Draft Galway County Development Plan 2022-2028 sets out the policies and objectives for the County in relation to Rural Living and Development. Galway County Council recognises the important role that the rural area plays in the county from a housing, economic and social perspective. For this reason, Galway County Council has developed a vision for the County relating to Rural Living and Development.

"Support the role of rural areas in maintaining a stable population base through a strong network of villages and small towns and strengthening rural communities"

by supporting a resilient rural economy and the sustainable management of land and resources”.

Section 4.5.2.1 ‘Serviced Villages’ states it is considered that there is potential for multi-unit development and are considered appropriate with a site-specific design strategy required to guide the development of each plot. Several design elements are required to be considered for the development to fit within the individual village.

“RC 6 Residential Development Potential of Villages: Within the footprint of villages, development will be considered where it involves multi-house developments, subject to services, siting, design, protection of residential amenities and normal Development Management criteria as outlined in Chapter 3 Place Making, Regeneration and Urban Living and Chapter 15 Development Management Standards.”

It is believed that the inclusion of the subject site within the Settlement Boundary and the rezoning of the site to R-Residential (Phase 1) would lead to a modest yet high quality, multiunit, sustainable and compact residential development. A future residential development would be accessible via ‘Rinn na Mara’ development (currently under construction) and would integrate seamlessly with this development. This leads to a more built-up, sustainable and compact residential area in Kinvara and would therefore align with national and local policy.

Justification for Rezoning

Compact Growth

It is our client’s submission that the subject lands are suitable for Phase 1 Residential development for a number of reasons. It is submitted that although the subject site is not formally zoned for residential development, it is in fact more sustainable for development to occur on the subject site than elsewhere, such as lands in the very far east of the settlement. The subject site is immediately adjacent to the Settlement Boundary and the localised pattern of development in Kinvara within the immediate environs of the subject site reflect how a modest residential scheme can integrate successfully at this location.

The surrounding sites have been developed upon with ‘Ard An Mhuillin’ and ‘Nuns Orchard’ being constructed and ‘Rinn na Mara’ currently under construction (which any future development on the subject site could be accessed and integrated via this). Furthermore, the neighbouring site to the east is zoned R-Residential (Phase 1) Therefore, it is argued that this has now become a built-up area.

The Sustainable Rural Housing Guidelines states, urban generated housing should take place within built up areas. Therefore, it is considered that this site would be suitable for residential development and should not be precluded from development under the new Galway County Development Plan 2022-2028. Any future residential development on this site would therefore occur in a built-up area and will link and connect to the existing residential developments.

When considering the above, it is argued a residential development on the subject site will achieve a sustainable and high-quality development while contributing to national and local policy of consolidating compact growth.

Additional Residential Phase 1 Lands and Sequential Development

As previously mentioned, there has been a significant reduction of Phase 1 residential lands from the Kinvara LAP 2005-2011. The LAP had designated 33.5 ha of lands for Residential Phase 1 development which has been reduced to 7.27 ha under the Draft Plan. It is submitted

that such an extreme reduction in serviced residential land risks the ability of the Plan to deliver much needed housing for the locality. The housing market by its very nature needs adequate head-room, near-term and longer-term certainty on sites for delivery, including zoning to facilitate the same. The inclusion of our client's lands within the quantum of reserved Phase 1 Residential lands will not prejudice the delivery of housing on the proposed Phase 1 lands but will rather complement their standing and contribute to creating a critical mass needed to support existing and planned services.

The sequential approach to development must be adopted in Development Plan preparation, as required by *Development Plans: Guidelines for Planning Authorities* and *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages)*. The principles of the sequential approach involve the designation and development of more central and accessible lands first, generally working on the basis of prioritising lands in the centre of a settlement first and then radiating out. The subject site while at the edge of the settlement boundary is immediately bound by under-construction residential lands, and lands recognised as being appropriate for immediate term delivery. The lands are within walking distance of the village and rank more preferably for development than other zoned lands such as those to the far east of the settlement.

Evidence of the adoption of the principles of sequential development is noticeable in the Draft Plan. Section 2.3.11 discusses compact growth for the County and how at least 30% of housing within settlements is to be within the existing built up footprint area in conjunction with sequential development of settlements. However, it is our client's respectful opinion that the subject lands are suited for Phase 1 Residential in accordance with sequential development. The subject site is bordering zoned Phase 1 Residential lands and would represent a logical extension of these, this combined with the existing and currently under construction residential areas to the south, the subject site is also 700m north-west of the village centre and is closer to the village centre than those Phase 2 Residential lands along the Settlement's eastern border.

Proximity to Services

The subject site as previously mentioned, is in a built-up area. The site has strong connections with the residential developments to the south and is in close proximity to sewer/wastewater services and can be easily connected to these. With these strong connections, the subject site is within walking distance from the village centre. Within close proximity to the subject site is a range of amenities, services and facilities such as St. Joseph's National School, Kinvara Community Centre, Costcutter, the Pier Head Bar and Restaurant. This can be seen in Figure 5 overleaf.

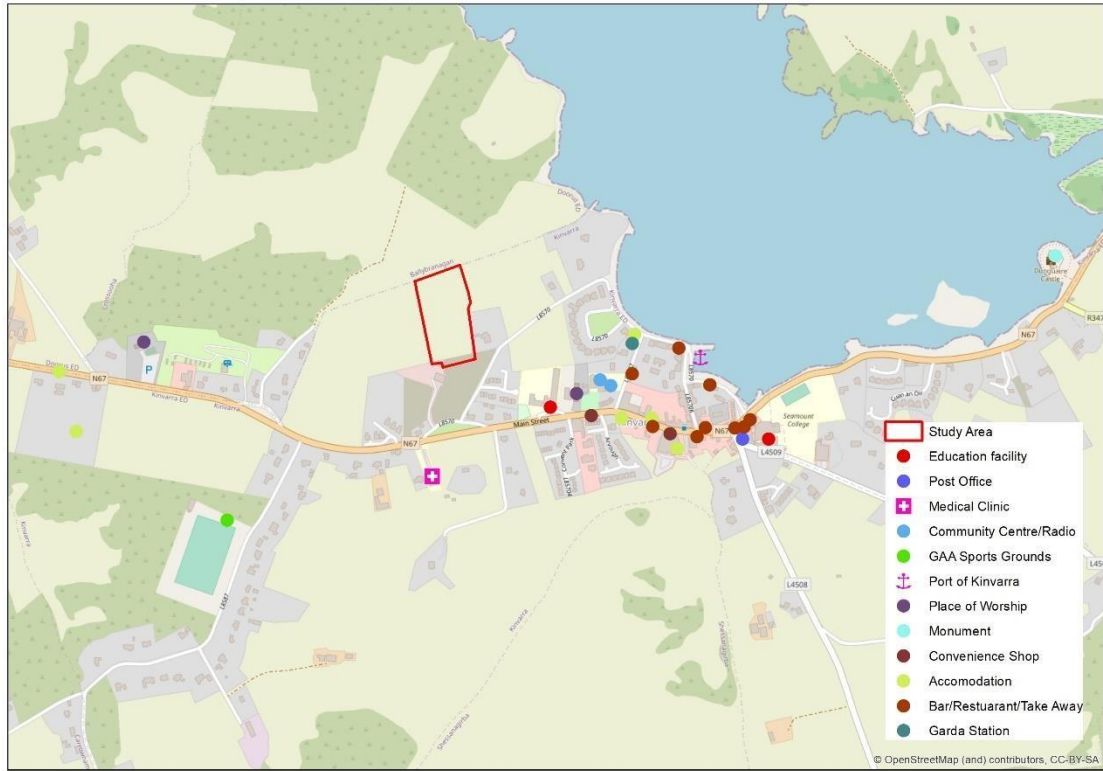


Figure 5: Subject Site and Proximity to Services.

Conclusion

In conclusion, our client welcomes the opportunity to engage with the Planning Authority in the preparation of the upcoming Development Plan and contributing to the sustainable growth and the development of the County over the Plan period.

It is submitted that this submission provides the planning justification and rationale in support of the inclusion of the subject site within the Kinvara settlement boundary and supporting the zoning of the land for R-Residential (Phase 1). It is considered that the resultant inclusion and rezoning will allow for a more compact and sustainable growth of Kinvara over the Development Plan period, allow for the sequential development of residential land whilst also preserving the integrity of existing zoned residential land.

We trust that the above is in order and look forward to receiving an acknowledgement of this submission in due course.

Please do not hesitate to contact us if we can be of further assistance in relation to the above.

Yours faithfully,

Stephen M. Purcell
 MIPI FSCSI FRICS
 Director and Co-Head
 KPMG Future Analytics
 Chartered Planning and Development Consultants