



Administrative Officer,
CDP Review,
Forward Planning Policy Unit,
Galway County Council,
Áras An Chontae,
Prospect Hill,
Galway City.

7th September 2020

Re: Submission to Issues Paper – Galway County Development Plan 2022-2028

A Chara,

I have been instructed by my client **Solus Junction Ulc**, to prepare a submission in relation to the forthcoming “Core Strategy” and “Headford Settlement Plan” which we understand will form part of the new Draft County Development Plan.

This submission essentially requests the Council to;

- (1) **Ensure there is a sufficient increase in the Core Strategy population allocation for “Headford”**

1.0 Location & Context

Presently, the settlement of Headford is identified as an “Other Village” under the provisions of the current County Development Plan settlement hierarchy. We would be of the opinion that the role of the settlement within north County Galway has been underestimated and undervalued to date. As such an increase in the Core Strategy Population allocation for the settlement is considered appropriate in the forthcoming Plan Period.

In spatial terms, the settlement of Headford can be described as a self-sufficient town in the north of the County, within a convenient commuting distance to Galway City.

In particular Headford has the benefit an public sewerage and water main networks, both of which have available capacities to cater for additional development. Furthermore, the settlement Headford is unique In County Galway, in so far that it has a wealth of local community facilities, which are uniquely located within the urban envelope of the settlement (See Figure 1 below).

The existing Core Strategy has the potential to constrain development and the delivery of targeted population growth in Headford. For example, the current Core Strategy is currently preventing the consideration of lands owned by my client for development, as these are currently located outside of the Plan Boundary. In this regard we refer to c.1.9ha of lands (i.e. the northern Section of Land Registry Folio Ref GY82215F) which are along the Cong Road which are serviceable and are located within the 50kmph speed limit.

The topography of the subject lands (in greenfield condition) is undulating but would not preclude the delivery of a well-designed higher density residential development at this location. The subject lands do not have any built or natural heritage designations on site. An indicative “Pluvial Flood Risk Area” is located at the western end of the site, however this is not considered to be a significant development constraint. As such, the lands are entirely suitable for development.

In this regard, the requested increase in the Core Strategy population would potentially enable the identification of suitable lands for development within the Settlement, in the interest of consolidated and sequential urban development.

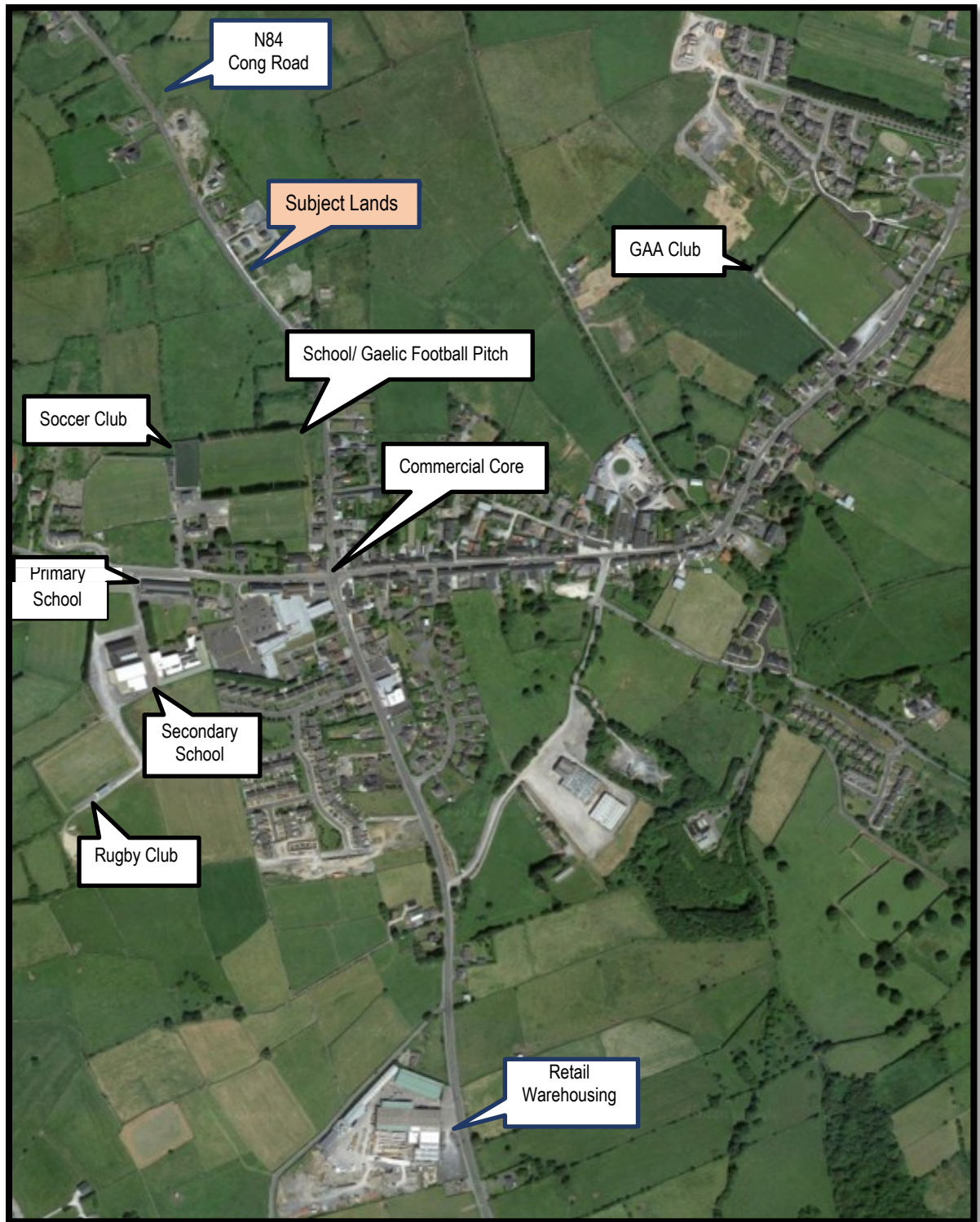


Figure 1: Map of showing the Location of community and large commercial facilities within the settlement / urban envelope of Headford.

2.0 Grounds of Submission

This submission essentially requests the Council to;

- (1) Ensure there is a sufficient increase in the Core Strategy population allocation for “Headford”

2.1 Locational Advantages of Headford

Headford has a number of strong locational advantages to accommodate future development growth. These include the following;

- Its convenient commuting accessibility to Galway City & Tuam
- The availability of public sewerage and water main networks
- The availability of the natural gas network within the town
- The availability of self-sufficient commercial and modern retail facilities within the commercial core
- The availability of self-sufficient recreational/community facilities within the urban envelope
- The availability of centrally located schools (Primary & Secondary)

All of the above attributes of Headford means that it has the ability to accommodate higher density residential development during the plan period. Therefore, the request for an increased allocation within the Core Strategy for the Headford Settlement Plan area, is entirely justifiable in this case.

3.2 Compliance with Regional Spatial & Economic Strategy

The RSES for the Northern and Western Regional Assembly was adopted on 24th January 2020. This replaces the Regional Planning Guidelines 2010-2022 (RPGs). The principle 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 longterm strategic planning and economic framework for the development of the regions.”

More specifically, Section 3.6 of the RSES sets out the “Galway Metropolitan Area Strategic Plan (MASP)”. A statement of compliance with the relevant provisions the RSES is outlined in Table 1 below.

Table 1 – Compliance with Section 3.6.3 of the RSES (Galway MASP)

Heading	Policy / Objective Provision	Compliance
Section 3.5 – Smaller Towns, Villages and Rural Areas	<i>“The NPF target for at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites is an important opportunity for our smaller towns and villages to be re-imagined and therefore it is included as a key objective.”</i>	An increased population allocation for the urban area of Headford, to cater for additional land to accommodate higher density residential development, would be consistent with the provisions of the NPF/RSES.
Regional Policy Objective 3.4	<i>“To support the regeneration and renewal of small towns and villages in rural areas.”</i>	An increased population allocation for the urban area of Headford, to cater for additional land to accommodate higher density residential development, would be consistent with the provisions of the NPF/RSES.
Regional Policy Objective 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.	Headford can be classified as a small to medium sized town, which has a remarkably strong service provision/ service catchment. In particular, we refer to its extensive retail facilities, and wealth of community and recreational facilities, which are all located within the settlement. As such its position within the Settlement Hierarchy and Coe Strategy warrants review.

Accordingly, an increased population allocation for the “Headford” Plan area, together with the consideration of the lands for higher density development, would in a modest way contribute towards the delivery of consolidated urban expansion of this serviced settlement, as envisaged in the NPF and RSES.

3.3 Serviceability of Headford

As stated above, lands Headford are entirely serviceable. Furthermore, the existing foul sewer and the public water mains are located along the R335 Cong Road.

We would submit that the availability of serviceable lands within the towns of Co. Galway are becoming an increasingly rare commodity.

Therefore, having regard to the RSES population projections, and the emphasis on facilities the consolidated urban development on serviced lands, an increased population allocation for Headford can be considered in this case, which would enable the consideration of suitable lands for higher density development purposes as part of the forthcoming Development Plan.

3.5 Absence of Environmental, Natural or Built Heritage Constraints

It is envisaged that the requested higher population allocation for Headford, commensurate to its settlement role and availability of infrastructural, commercial, community and recreational services, will enable the designation of suitable lands for development purposes, where there are no environmental designations, significant flood risk constraints, archaeological monuments or protected structures on site.

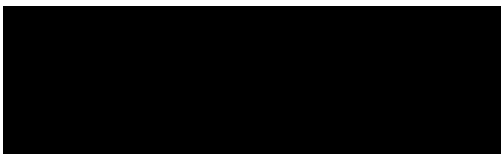
3.6 Position within the Settlement Hierarchy

Presently, under the provisions of the “Settlement Hierarchy” which forms part of the current CDP, Headford is identified as “Other Villages”. It is grouped in the same hierarchy as 21 no. other settlements. However, it is noted that very few of the “Other Villages” in the hierarchy have the benefit of a fully function public sewer and mains water supply. As such, in line with National & Regional Planning Policy, we would submit that settlements such as Headford, who have the benefit of such infrastructural services, should be afforded a higher population allocation in the Core strategy and potentially a higher position in the Settlement Hierarchy.

4.0 Summary

On behalf of my client we now look forward to both a detailed and favourable consideration of this submission by Galway County Council. If you wish to clarify any items raised in this submission please do not hesitate to contact me. I would be grateful if you could acknowledge in writing receipt of this submission.

Yours faithfully,



Senior Planning Consultant,
BA MRUP Dip APM
Planning Consultancy Services.

