

20th February 2024

Galway County Council,
County Hall,
Prospect Hill,
Galway,
H91 H6KX

Re: Draft Gort Local Area Plan [2025-2031]

A chara,

Thank you for your authority's work on preparing the draft Gort Local Area Plan 2025-2031 (the draft Local Areal Plan).

The Office of the Planning Regulator (the Office) wishes to acknowledge the considerable and evident work your authority has put into the preparation of the draft Local Areal Plan.

As your authority is aware, a key function of the Office is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning.

The Office has evaluated and assessed the draft Local Areal Plan under the provisions of sections 31AO(1) and 31AO(2) of the Planning and Development Act 2000, as amended (the Act) and this submission has been prepared accordingly.

The Office's evaluation and assessment has had regard to the Galway County Development Plan 2022-2028 (the County Development Plan), the Regional Spatial and Economic Strategy (RSES) for the Northern and Western Regional Assembly (NWRA) area, and relevant section 28 guidelines. This submission makes four (4) recommendations and four (4) observations.

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, Galway County Council (the Planning Authority) is requested to implement or address

recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. The Planning Authority is advised by the Office to action an observation.

A submission can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. The Planning Authority is requested by the Office to give full consideration to the advice contained in a submission.

Overview

The Office commends the preparation of a draft Local Area Plan which is consistent with the approach in the County Development Plan and designates Gort as a Self-Sustaining Town (Tier 4) in the settlement hierarchy.

The Office welcomes section 1.2.3 which outlines the requirement for the draft Local Area Plan to be consistent with the core strategy of County Development Plan, setting out clearly the housing projections for Gort Town which is 800 persons over the plan period. The section accurately highlights the figure of 460 as an overall projection for residential units. However, there is a need for table 1 and other parts of the draft Local Area Plan to clearly indicate the overall housing allocation for the town and how this has been allocated as Greenfield/brownfield lands and distributed to the various zonings.

The Office commends the Planning Authority's approach in reviewing the settlement limit boundary from the last plan period which will support the sustainable growth of the town in areas with good access to existing facilities and amenities, and making most efficient use of existing infrastructure. However, the Office notes a more detailed table/matrix outlining the individual sites for both Residential 1 and Residential 2 is needed to clarify how the Greenfield land has been distributed consistent with the core strategy.

In regard to Residential Zoning Lands, the Office notes that total area of the land proposed to be zoned New Residential 1 in the draft Local Area Plan is 12.8 ha and

appears to be consistent with that required to meet the core strategy of 460 units as allocated in the County Development Plan.

The Office also commends the approach to Residential 1 Lands zoned in the draft Local Area Plan. The four sites zoned are well located to town centre, some very close to active travel public transport options, and are well serviced, therefore providing good choice of sites for the town.

The Office notes, however, that the area of R2 zoned land is twice that of the Phase 1 Lands and would significantly exceed the land requirements identified in the core strategy. Furthermore, Policy Objective GSST6 of the draft Local Area Plan may be read as facilitating all of this land becoming available within the plan period. The Office has raised a number of concerns with this approach below, particularly in relation to the peripheral location of one particular site on R460 Glenbrack Road (zoning R2d) .

The Office welcomes the inclusion of Policy Objectives GSST 16, GSST17, GSST18 of the draft Local Area Plan which ensure that there is appropriate development to support employment in the town. However, the Office is concerned regarding the accuracy of service availability information provided for on several sites, BEa, BTa and Ib which should be addressed.

The Office commends the focus of the draft Local Area Plan on Town Centre First Policies and Regeneration proposals. It commends the provision of specific policies GSST9, GSST11, GSST 12 to promote the regeneration of the town as well as policy objectives protecting and enhancing the character and design of the town centre through GSST32, GSST35 and GSST38 and GSST39. However, the Office notes there is a lack of clarity, mapping or tables to highlight these positive interventions and to demonstrate how these proposals will be prioritised and phased to integrate with wider residential, employment and active travel proposals. Also the Office notes the high vacancy rates in Gort town and it is important that the Local Area Plan addresses this issue and identifies critical measures and/or actions for vacant shops and buildings and not only underutilised land.

The Office welcomes the publishing of the Gort Local Transport Plan (LTP) and the LTP methodology, which supports the integration of land use and transport planning by including a range of measures to improve sustainable transport. Gort Town Centre Public Realm Enhancement Project Proposals, the Gort River Walk and Ennis walkway

improvements are to be all highly commended. The Office makes a number of recommendations to better integrate some LTP measures into the Local Area Plan and to highlight transport project priorities/phasing. Furthermore, although there are plans for car parking to be rationalised through the town centre public realm scheme, the overall quantum of car parking has increased by 23% which does not support our climate objectives by reducing greenhouse gas emissions.

Finally, the Office requests your authority to pay particular attention to the Office of Public Works (OPW) recommendations generally, and specifically to the recommendation to reconsider justification tests and review undeveloped zoned lands and consider amending or omitting part of, to remove potential risks at Opportunity Site 04, Existing housing zone at Tubber Road, and BTA, and to ensure greater clarity and robustness in relation to protecting people, property and the environment.

It is within this context the submission below sets out four (4) recommendations and four (4) observations under the following themes:

Key theme	Recommendation	Observation
Core strategy and residential land use zoning	Recommendation 1	-
Economy and employment	Recommendation 2	-
Town centre and regeneration	-	Observation 1 Observation 2
Transport and accessibility	Recommendation 3	-
Flood risk management	Recommendation 4	Observation 3
Implementation and monitoring	-	Observation 4

1. Consistency with the Regional, Spatial and Economic Strategy

Section 19 (2) of the Act requires a Local Area Plan to be consistent with the objectives of any RSES that applies to the area of the plan.

The RSES has identified a settlement strategy for the Northern and Western Region and this has been brought forward into the County Development Plan, which identifies Gort as a Self-Sustaining Town.

Self-Sustaining Towns such as Gort are identified as settlements with high level of population growth, a limited employment base and are reliant on other areas for employment and /or service. It is considered necessary that these settlements require targeted 'catch up' investment to become self- sustaining and the strategy is to consolidate their role in the hierarchy to support their employment expansion while residential development will be facilitated to support sustainable growth of these towns.

The settlement strategy seeks to support the need to support Self-Sustaining Towns requiring contained growth, focusing investment of services employment and infrastructure whilst providing a viable alternative to single housing in the countryside.

RPO 3.13 of RSES is a key policy for this Local Area Plan which aims to support the role of smaller towns such as Gort and highlight their role in terms of service provision and employment for their catchment within the county of Galway. Also, RPO 3.2 of the RSES seeks to follow the NPF to aim to deliver 30% of all new homes in settlements within existing built up footprints of populations of at least 1,500 which would apply to Gort and therefore a relevant consideration.

The draft Local Area Plan identifies four Opportunity sites, a list of regeneration projects including a new Gort Town Centre Public Realm Enhancement Project, alongside a number of new proposals for improvements to walking and cycle paths as well as other active travel proposals. It also has a focus on town centre first policy with Opportunity sites identified for a range of town centre uses mixed with housing. The Office welcomes the selection of these sites and proposals but in order to encourage and ensure delivery, these proposals should be set out more clearly, particularly how this integrates and is phased with the proposed Residential and Employment lands. This matter is dealt with under the Regeneration section below.

The draft Local Area Plan is therefore considered to be broadly consistent with the policies and objectives of the RSES, except as may be otherwise identified below.

2. Core strategy and residential land use zoning

The Office welcomes section 1.2.3 which outlines the requirement for the draft Local Area Plan to be consistent with the core strategy of County Development Plan, setting out clearly the housing projections for Gort Town which is 800 persons over the plan

period. The section accurately highlights the figure of 460 as an overall projection for residential units.

However, table 1 identifies the core strategy population figure but has omitted the overall housing supply target of 460 as set out in the core strategy of the County Development Plan.

Table 1 of the draft Local Area Plan identifies a requirement for 12.9 ha of Greenfield land consistent with the core strategy of the County Development Plan. The draft Local Area Plan proposes to zone 12.8 ha of lands as Residential Phase 1, and 28.6 ha as Residential Phase 2.

In regard to Residential Phase 1 lands, the Office accepts that the lands provide for compact growth and a sequential approach to zoning, and are fully serviced or serviceable within the plan period. Some of these lands also currently have the benefit of planning permission.

The Office does, however, have a number of concerns regarding the approach to the Residential Phase 2 zoned lands. These lands comprise more than double the extent of the Phase 1 lands and, together with Policy Objective GSST 6 which facilitates the granting of planning permission on these lands, have the potential to undermine the provision of a clear overall strategy for residential development in the town.

In particular, the Office notes that there are three recent extant permissions for residential development on these lands comprising c.320 units, over the 50% of the core strategy housing target. As such, Policy Objective GSST 6, which states that 'Development on residential (Phase 2) lands will normally only be considered where 50% of the lands in Residential (Phase 1) are committed to the development', could be read to mean that planning permission can be granted on the R2 zoned lands from the outset, making the distinction between these lands and the preferably located R1 zoning lands mute.

The Office is of the view therefore, that proposed policy GSST6 should be reviewed to ensure that R1 lands will not be overtaken/leapfrogged by Phase 2 lands contrary to the delivery of compact growth and the sequential approach to zoning whereby the most spatially centrally located development sites in settlements are prioritised for new development first, with more spatially peripherally located development sites being zoned subsequently.

The Office also considers that the current 'exceptional circumstances' criteria may be difficult to apply through the development management process.

While acknowledging the need to provide for local choice and flexibility to meet the core strategy housing targets, it is important that this is facilitated in a manner that ensures the compact and sustainable growth of the town and supports sustainable mobility. In this regard, some of the R2 lands are more preferably located than others in terms of compact growth and infrastructure capacity.

The Office also notes that no detail is provided in terms of the housing yield of the land zoned for Residential or Mixed Use, which could usefully be illustrated in table 4 of the draft Local Area Plan and in the Infrastructure Assessment on Residential and Employment Lands which accompanies the draft Local Area Plan. Together with a review of the Infrastructure Assessment to clarify the most up to date position regarding water and sewerage capacity, this would assist in clearly identifying the lands most suitable for the R2 zoning objective.

Finally, the Office has a particular and significant concern regarding zoning objective R2d (11.6 ha) on R460 Glenbrack Road due to its peripheral location and scale relative to the requirement for 12.9 ha of Greenfield land specified in table 1 of the draft Local Area Plan, and more. Furthermore, Uisce Éireann has indicated that the site will require localised upgrades for both water and wastewater and significant extensions up to 150 metres for water and sewer. It also appears that the lands are not served by a continuous footpath along the R460 between the site and the town centre.

The Office also has a particular concern regarding objective R2a (1.1ha) on lands off R458 north of Cuirt Bhreac housing estate due to its peripheral location and the need for significant connections into water and waste, which may require a 325 length extension for water and sewer if not feasible to connect through adjoining Cuirt Bhreac housing estate as identified by Uisce Éireann.

Having regard to these matters, the Office recommends that that further consideration is given to the approach to R2 zoned lands to ensure that the draft Local Area Plan provides a clear and transparent strategy for residential development consistent with the core strategy of the County Development Plan, the principles of compact growth and the sequential approach to zoning, and the infrastructure capacity of the subject lands.

Recommendation 1 – Core strategy and residential land use zoning

Having regard to the provision of new homes at locations that can support compact and sustainable development and the co-ordination of housing delivery and infrastructure, and in particular to:

- RPO 3.1, RPO 3.2 , RPO 3.4 of the RSES;
- the core strategy of the Galway County Development Plan 2023 – 2028 (the County Development Plan);
- Policy Objectives CS1, CS2, CS3, CS5 and C57 of the County Development Plan regarding sequential and compact development;
- Policy Objectives WS1, WW1, WW2 of the County Development Plan regarding infrastructure capacity and delivery;
- the policy and objective that planning authorities adopt a sequential approach when zoning lands for development under section 6.2.3 of the Development Plans, Guidelines for Planning Authorities (2022) (the Development Plans Guidelines); and
- the policy and objective for zoned land to be informed by a Settlement Capacity Audit under section 6.2.1 of the Development Plans Guidelines,

the Planning Authority is recommended to:

- (i) amend table 1 of section 1.2.3 of the draft Gort Local Area Plan 2025-2031 (the draft Local Area Plan) to include the housing supply target for Gort consistent with the County Development Plan core strategy;
- (ii) amend table 4 of section 1.7.2 of the draft Local Area Plan to include the housing yield of the land zoned for Residential or Town Centre and Mixed Use / Commercial;
- (iii) review the Infrastructure Assessment which accompanies the draft Local Area Plan to include the potential housing yield of the land zoned for residential or mixed use and to update the information, in particular regarding water and wastewater capacity;

- (iv) omit zoning objectives if they cannot be reasonably or cost effectively serviced within the plan period;
- (v) omit the R2d zoning objective which is peripherally and non-sequentially located at R460 /Glenbrack Road, is not adequately serviced, and is inconsistent with the core strategy of the County Development Plan;
- (vi) omit the R2a zoning objective which is peripherally located and non-sequentially located on R458 north of Cuirt Bhreac, is not adequately serviced and is inconsistent with the Core Strategy of the Development Plan; and
- (vii) amend the wording of proposed Policy Objective GSST6 of the Local Area Plan to ensure that R1 lands will not be overtaken/leapfrogged by Phase 2 lands contrary to the delivery of compact growth and the sequential approach to zoning whereby the most spatially centrally located development sites in settlements are prioritised for new development first, with more spatially peripherally located development sites being zoned subsequently.

The Planning Authority is advised to engage with Uisce Éireann in relation to (iii) and (iv) above.

3. Economy and Employment

The promotion of economic development is a clear focus in the strategic aims of the draft Local Area Plan which is to be welcomed given its designation as a Self-Sustaining Town in the County Development Plan core strategy. In particular, it highlights this role, promoting a Town Centre First approach to attract new businesses for retail/service functions, promotion of tourism to tap into the local potential assets and amenities as well as capitalising on Gort's strategic location and proximity to strong road network links to Galway (M18) and beyond and a railway links and station in the town. It also highlights the desire to create sustainable employment opportunities on appropriately zoned lands.

Policies GSST 16 - Business and Technology and GSST 17 - Business and Enterprise and GSST 18 - Industrial are all also to be welcomed and adequately address and support the regional and national policies to strengthen Gort's role as a Self - Sustaining Town.

There are five main land use zonings identified in the draft Local Area Plan of various scale and in a mixture of Brownfield and Greenfield sites.

However, although an Infrastructure Assessment has been carried out for the five sites, this does not appear to be consistent with the Uisce Éireann submission which identifies the need for localised upgrades into the Water Network at Employment Lands sites Id and extension over 100 m to site BEa and also the requirement of sewer network extensions over 100 m at sites Ib, BEa and BTa. Also a potential issue with site BTa flooding on a small area of the zoned land, all of which needs review and consideration.

Furthermore, it is not clear how much of this quantum is existing and land remaining for future employment land use purposes. Inclusion of this information would be of benefit in terms of delivering on the objectives for economic growth, and to guide future potential development of the lands.

Recommendation 2 - Employment zoned lands

Having regard to the co-ordination of land use zoning and infrastructure, and in particular to:

- RPO 9.3 of the RSES;
- Policy Objectives WS1, WW1, WW2 of the Galway County Development Plan 2022-2028 (the County Development Plan) regarding infrastructure capacity and delivery; and
- Policy Objectives SS4 (Self-Sustaining Towns – Level 4) of the County Development Plan ES1, SC01 and SC02,

the Planning Authority is recommended to:

- (i) review of availability of services of Water, Sewers and Flood risk for each zoning identifying any infrastructure requirements, details of the delivery of the required services, and/ or capacity to support new development; and
- (ii) review the Infrastructure Assessment for the Employment Zoning Lands providing clarity on the scale of each site, extent of land uptake to date and the available lands remaining of each of the zonings.

4. Town centre and regeneration

The Office welcomes the overall objectives of the draft Local Area Plan regarding its focus on Town Centre First and aim to deliver sustainable regeneration for the town, and its identification of four key Opportunity Sites within the town centre.

One of the main characteristics of Gort is its traditional market town form and the extent of built heritage, and the Office also welcomes the key objective to promote tourism and capitalise on Gort's tourist potential as an economic driver by enhancing both built heritage and natural heritage assets.

Also commendable are key proposals for the regeneration of the public realm in the town centre. Some of these proposals are detailed in the Gort LTP which is considered in the Transport section of this submission.

Section 1.2.5 of the Local Area Plan addresses the Town Centre First Plan. This highlights a summary of key themes and proposals ranging from conservation/heritage proposals, connectivity/wayfinding proposals, multi sports improvements, enhancement of parks/greenways for the town. The draft Local Area Plan policies GSST 9 - Protecting the town centre, and GSST11 - Supporting Town Centre First policy and GSST 12 - promotion of protection and enhancement of traditional shop front designs were appropriate, are all to be welcomed.

The Office notes however, as there is no specific section, table or maps which clearly identify and combine the details of all the potential regeneration projects, delivery timelines and priority phasing, the draft Local Area Plan misses the opportunity to demonstrate the positive impact this will bring to the town centre and how this will integrate into the implementation of wider residential and economic zonings and benefit residents and tourists.

Observation 1 - Delivery of regeneration projects

Having regard to the need for compact growth and town centre regeneration, and in particular to:

- RPO 3.4, RPO 3.6, RPO 3.9, RPO 4.45, RPO 4.47, RPO 7.20 of the RSES; and

- Policy Objectives CS1, CS2, CS3, CS4, CS5, CS7 of 2.3.14 of the Galway County Development Plan 2022- 2028,

the Planning Authority is advised to:

- (i) review and enhance section 1.2.5 Town Centre First and link with sections 2.8 Transport and Movement and 3.0 Opportunity Sites of the draft Gort Local Area Plan 2025 – 2031; and
- (ii) provide clearer policies and objectives, including detailed table /mapping, regarding the timelines and phasing of the delivery of various proposed built heritage, town centre and community facility based projects.

In addition, the Office notes that Gort has been identified as having a commercial vacancy rate of 15.7% and a residential vacancy of 5.6% by the Northern and Western Regional Assembly’s Regional Vacancy and Dereliction Analysis (2022).

The Office does acknowledge that Galway County Development Plan includes policy objectives that supports the approach outlined (policies CGR3, CGR4, CGR8 and CGR13). However, given the extent of the vacancy in the town it is important that this issue is specifically acknowledged and addressed at a local level in relation to Gort by identifying the critical measures and /or actions the Planning Authority will use to address vacancy. This should apply not only to underutilised lands but also vacant shops and /or vacant buildings.

In order to demonstrate the effectiveness of the Planning Authority’s approach, the draft Local Area Plan should also include measurable targets for the resolution of vacancy and proposals for monitoring same.

Observation 2 – Vacancy

Having regard to the reversal of rural decline in the core of small towns through sustainable targeted measures to address vacancy, and in particular to:

- RPO 3.4, RPO 3.6, RPO 4.45, RPO 4.47 of the RSES;

- Policy Objectives CSA2, CSA3, CGR2, CRG3, CGR4, CGR8 Town Centre, CGR13 Town Centre first of the Galway County Development Plan 2022-2028; and
- The Town Centre First, A Policy Approach for Irish Towns (2022),

the Planning Authority is advised to include additional or stronger policy objectives setting out measures and /or actions to address vacancy and measurable targets for the reduction of vacancy during the plan period and a strategy for the monitoring of same.

5. Transport and accessibility

The Office welcomes the publishing of the Gort LTP in tandem with the draft Local Area Plan, consistent with Objective ILUTP 3 of the Galway County Development Plan, 2022 – 2028, RPO 6.27 of the RSES and within the context of National Sustainable Mobility Policy, mandatory climate change objectives under the Climate Act and the actions relating to transport under the Climate Action Plan 2024. The Office notes and welcomes the preparation of the LTP using the ABTA methodology, which supports the integration of land use and transport planning by including a range of measures to improve sustainable transport.

The LTP indicates one of its main objectives is the creation of an environment which encourages a modal shift from private car to sustainable modes during the plan period. This will be essential to achieving national mandatory climate action targets to reduce greenhouse gas emissions by 51% by 2030. Having clear modal shift objectives would assist with achieving these targets and the Office recommends the inclusion of ambitious but realistic mode share targets for the town, together with an effective monitoring programme within the draft Local Area Plan.

While the LTP sits alongside the draft Local Area Plan, the Office is concerned that the LTP measures and strategy have not been adequately integrated into the draft Local Area Plan. While policy objectives GSST 44 to GSST 53 of the draft Local Area Plan are noted, it is recommended that stronger and more explicit policy support for the implementation of the preferred strategy and associated interventions is included, in line with RPO 6.28 of the RSES, which requires the incorporation of LTP measures into local area plans. The draft Local Area Plan should also provide clear mapping of the active

travel network. Clarity is also required around GSST 44, which refers to the implementation of the LTP as set out in section 3. Section 3 of the draft Local Area Plan though relates to Opportunity Sites.

Another key requirement of LTPs, as outlined in section 6.3 of the RSES, Enabling Plans – Local Transport Plans, is to set out the transport priorities for the plan area. The Office welcomes the identification of an emerging preferred strategy together with a wide range of sustainable transport measures in the LTP. The Office recommends however that the priority projects to be progressed during the plan period are highlighted within the LTP and draft Local Area Plan, together with implementation timeframes.

The Office commends the progression of Town Centre First initiatives and in particular the public realm enhancements proposed for the town centre as detailed under section 6.2.2 and figure 6-3 of the LTP. There are a number of areas though where stronger coordination and consistency is recommended between the Town Centre First initiatives and the LTP, the County Development Plan and the RSES, particularly in the areas of car parking provision, public transport and cycle infrastructure.

Section 2.3.4 of the LTP indicates a 23% increase in car parking within town centre areas under Town Centre First initiatives. This is inconsistent with Policy NNR 8 of the County Development Plan, which promotes parking provision in a manner which supports sustainable transport choices and modal shift. In addition, section 6.3 of the LTP highlights the proposed relocation of town centre bus stops to more peripheral locations and also indicates that cycle infrastructure proposed in the LTP is not to be extended through town centre areas, including along a significant length of the R458. The Office is concerned that these issues, together with the overall level of parking and traffic circulation envisaged in the town centre public realm proposals, are not consistent with RPO 6.29 of the RSES, which indicates that the management of space in town centres, should deliver a high level of priority and permeability for walking, cycling and public transport modes to create accessible, attractive, vibrant and safe places. It is recommended therefore that the public realm initiatives are revised to improve coordination and consistency with the LTP and with RPO 6.29 of the RSES.

Section 3.5.2 of the LTP highlights that the cycle mode shares for school trips at 0.2% is well below the national average of 2.4%. The Office therefore welcomes in particular, the Gort River Walk and Queen Street to Ennis Road initiative, which is highlighted in section

6.2.4 and figure 6-5 of the LTP, as a key active travel proposal under the Town Centre First Plan, providing connections to residential areas, the town centre and schools, while also addressing the severance caused by the river and the railway line. In accordance with policy objective NNR 5, School Travel Plans, of the County Development Plan, it is recommended that this initiative is referenced directly in the Emerging Preferred Strategy of the LTP with explicit policy support for its implementation included within the draft Local Area Plan.

Recommendation 3 - Integrated transport and land use planning

Having regard to the integration of land use and sustainable transport, and in particular to:

- RPO 6.26, RPO 6.27, RPO 6.28, RPO 6.29, RPO 6.30, RPO 6.31 & RPO 6.32 of the RSES;
- Policy Objectives GCTPS 3, ILUTP 1, ILUTP 3, WC 1, WC 3, WC 4, WC 5, PT 1, PT 2, NNR 5, NNR 8 of the Galway County Development Plan 2022 – 2028 (County Development Plan); and
- The Climate Action and Low Carbon Development Act 2015, as amended, mandatory target to reduce greenhouse gas emissions by 51%, and the Climate Action Plan 2024, and associated actions including the National Sustainable Mobility Policy (2022) targets to reduce vehicle kilometres travelled per year and the National Investment Framework for Transport in Ireland (2021),

the Planning Authority is recommended to:

- (i) incorporate the measures and proposed modal networks of the LTP and include clear mapping and policy support for the proposed interventions within the draft Gort Local Area Plan 2025-2031 (draft Local Area Plan);
- (ii) include mode share targets for the settlement together with an effective monitoring programme;
- (iii) identify priority active travel projects to be progressed during the plan period together with implementation timeframes;
- (iv) revise the town centre public realm initiatives in order to improve coordination and consistency with the LTP, the County Development Plan and with RPO

6.29 of the RSES, having particular regard to the provision of car parking, bus stops and cycle infrastructure; and

- (v) amend the LTP's Emerging Preferred Strategy to directly reference the Gort River Walk and Queen Street to Ennis Road active travel initiative and include explicit policy support for its implementation within the draft Local Area Plan.

6. Flood Risk Management

The Office welcomes the preparation of the Strategic Flood Assessment (SFRA) and the acknowledgement of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines) as part of the draft Local Area Plan. In particular, the following draft Local Area Plan Policy Objectives are welcomed: GSST 19, GSST 58-60, GSST 63, GSST 66, GSST 73 to provide additional support for the management and sustainable use of the flood risk areas.

The Office welcomes the inclusion of Flood Map Zoning Map 3 and Constrained Land Use Zone comprising a combination of Flood Zone A and B overlaid on the land use Zoning Map 1A. However, Flood Zones A and B are not separately identifiable on the Land Use Zoning Map and it is difficult therefore to consider if the sequential approach has been applied appropriately.

The Office also welcomes the provision of Plan Making Justification Tests in the draft Local Area Plan. However, the Office is concerned where sites have not satisfied the Justification Test, the approach of the authority has been to rely on Policy Objective GSST 25 Constrained Land Use to limit inappropriate development on lands. Measures such as this may be appropriate particularly where already developed lands overlap with areas of identified flood risk, and the zoning is retained to reflect existing usage, and where opportunities to develop further is limited. However, this is not appropriate in the case of undeveloped lands which have not satisfied the sequential approach to avoid development or amend/substitute to a zoning with an appropriate level of flood risk.

The Office has identified several areas/part zonings in the draft Local Area Plan that appear to be fully or partially undeveloped, for which it has not been demonstrated that the criteria of the Plan making Justification Test have been satisfied, and which have been zoned for vulnerable uses including:

- Part of Opportunity Site 4
- Zoned Existing Housing development on Tubber Road
- Zoning BTa – Business & Technology Park at Glenbrack Road.

The OPW has also raised concerns also regarding the zoning of these lands in areas at risk of flooding.

The Office notes that the OPW has raised a concern regarding Agriculture Zoned Lands in the draft Local Area Plan. Land and buildings used for agriculture have been defined as less vulnerable development in table 3.1 of the Flood Guidelines, which is not appropriate in Flood Zone A unless all criteria of the Plan Making Justification Test have been satisfied. Furthermore, Agriculture zoned lands cannot satisfy the Plan Making Justification Test, due to the requirement that lands are essential in achieving compact and sustainable urban growth. It would be appropriate therefore to incorporate an objective, or an amendment to the zoning matrix (Table 5), limiting any less vulnerable development such as Agricultural Building or Mart/Co-Op in Flood Zone A. Objective GSST 23 should also be updated to clarify that highly vulnerable development such as one off housing would not be appropriate in Flood Zones A or B.

The OPW submission also identifies a number of issues in respect of the SFRA, including updating the National Indicative Fluvial Mapping and identifying the potential future flood extents included in Appendix II of the SFRA on the land use Zoning Map 1A in the draft Gort Local Area Plan (2025-2031) to highlight any development that could potentially be affected by climate change.

Recommendation 4 - Flood risk management

Having regard to the need to flood risk management, and in particular to:

- RPO 3.10 of the RSES to avoid inappropriate development in areas of risk of flooding and assess flood risk in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines);
- RPO 3.11 of RSES to ensure that flood risk management policies and infrastructure are progressively implemented;

- Policy Objectives FL3 of the Galway County Development Plan 2022-2028 to avoid development that will be at risk of flooding or that will increase the risk elsewhere where possible substitute less vulnerable uses, and Policy Objectives FL1, FL2 and FL3 to implement the guidelines of the Flood Guidelines; and
- the Flood Guidelines,

the Planning Authority is recommended to:

- (i) Part of Opportunity Site 4 (Community Lands) - omit the Community Facilities zoning objective on that part of the lands within Flood Zone A or B;
- (ii) Existing Housing development along Gort River, off southern section of Tubber Road - omit the Existing Residential zoning objective on that part of the lands within Flood Zone A or B;
- (iii) Zoning BTa – Business & Technology Park at Glenbrack Road - omit the Business & Technology Park zoning objective on that part of the lands located within Flood Zone A or B;
- (iv) Include an objective or amend the zoning matrix to restrict less vulnerable development such as Agricultural Buildings or Mart/Co-Op in Flood Zone A;
- (v) amend Objective GSST 23 to ensure that highly vulnerable development such as one off housing is not facilitated in Flood Zones A or B;
- (vi) include a policy objective to acknowledge the ongoing design planning and implementation of the Gort Lowlands Flood Relief Scheme;
- (vii) include a policy objective to ensure that development proposals do not prevent the progression of maintenance of drainage scheme schemes, including the Gort River (Bridge Street) scheme;
- (viii) overlay the extent of the Flood Zones A and B (separately) on the land use Zoning Map 1A in the draft Gort Local Area Plan (2025-2031) to clearly inform zoning decisions and provide for greater transparency;
- (ix) overlay the potential future flood extents included in Appendix II of the SFRA on the land use Zoning Map 1A in the draft Gort Local Area Plan (2025-2031) to highlight any development that could potentially be affected by climate change;

- (x) Update the SFRA to include the latest published version of the National Indicative Fluvial Mapping system.

The Planning Authority should consult with the Office of Public Works regarding this Recommendation.

Observation 3 - SuDs and nature based solutions

Having regard to the integration of climate action into the planning system, the Planning Authority is advised to include a robust framework and guidance in relation to the identification and use of SuDs, appropriate SuDs techniques and nature based solutions, including green infrastructure objectives, and in particular would be beneficial to assess on the four Opportunity Sites identified in section 3.0 of the draft Gort Local Area Plan 2025 - 2031.

7. Climate Action

The Office notes that the OPW welcomes the discussion on Climate Change in section 3.4 of the SFRA, the inclusion of Future Scenarios Mapping in Appendix II of the SFRA, and policy objective GSST 64 regarding flood risk assessment and climate change. It is noted that this guidance is primarily focused on consideration of climate change at the development management stage. In line with the Guidelines, while Flood Zones are defined on the basis of current flood risk, planning authorities need to consider such impacts in the preparation of plans, such as by avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences, specifying minimum floor levels and setting specific development management objectives. The potential future flood extents included in Appendix II of the SFRA might be shown overlaid with the land use zonings, to highlight any developments that could potentially be affected by climate change.

The Planning Authority is advised to actively engage with the OPW on these matters, in particular, greater consideration of the precautionary approach for climate change impacts and future scenario mapping at the plan making stage will be required.

The Office notes and commends the Planning Authority's focus on active travel proposals and measures, promoting modal shift for walking, cycling and public transport outlined in

the draft Gort LTP as part of the draft Local Area Plan and considered in the Transport section of this submission.

8. Implementation and monitoring

Having reviewed the draft Local Area Plan, the Office notes and welcomes that GSST 74, Implementation and Monitoring, provides for the monitoring of the core strategy. There is however, no other implementation and monitoring policy and objectives included in the draft Local Area Plan. Section 6.5 of the Local Area Plans, Guidelines for Planning Authorities (2013) states that planning authorities are encouraged to periodically review the success or otherwise of the implementation of the policies and objectives of a local area plan by effective monitoring systems. Furthermore, the review of the development plan as required by section 15 of the Act, will provide an opportunity to review the policy objectives of the Local Area Plan, particularly where policy objectives overlap between the County Development Plan and the adopted Local Area Plan.

Observation 4 - Implementation and monitoring

Having regard to the duty and function of the Planning Authority under section 15(1) and 15(2) of the Planning and Development Act 2000, as amended, the Planning Authority is advised to provide for plan implementation monitoring as part of the draft Gort Local Area Plan 2025-2031.

Note: Chapter 10 of the Development Plans, Guidelines for Planning Authorities (2022) provides useful guidance in this regard.

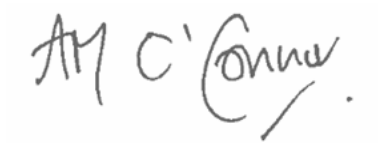
Summary

The Office requests that your authority addresses the recommendations and observations outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 20 of the Act must summarise these recommendations and the manner in which they will be addressed.

Where your authority decides not to comply with the recommendations of the Office, made to the draft Local Area Plan, please outline the reasons for the decision in the Chief Executive's report.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through plans@opr.ie.

Is mise le meas,

A handwritten signature in black ink that reads "AM O'Connor". The signature is written in a cursive style with a diagonal slash at the end.

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015
