

# **Chief Executive's Report on the Proposed Variation (No. 2) to the Galway City Development Plan 2023-2029**

**Planning Department**

**January 2026**



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# **1. Introduction and Overview**

## **1.1 Introduction**

This report forms part of the statutory procedure for the making of variation no. 2 to the Galway City Development Plan 2023-2029 (the Development Plan). It addresses the submissions received during the consultation period in relation to the proposed variation.

The purpose of this report is to:

- summarise the written submissions/observations received in relation to the proposed variation during the public consultation period.
- set out the Chief Executive's response to the issues raised in the submissions/observations and.
- make recommendations to the Elected Members on the issues arising from the consultation process.

## **1.2 Requirements under the Planning and Development Acts**

Section 13 of the Planning and Development Act 2000 (as amended) (the 2000 Act) allows for planning authorities to make variations to their development plan. On 31st December 2025, Part 3 of the Planning and Development Act 2024 (the 2024 Act) was commenced which supersedes the provisions of Section 13 of the 2000 Act. However, transitional provisions allow for variations commenced under the 2000 Act can continue under that Act when the relevant provisions of the 2024 Act are commenced. As such this variation, having commenced prior to the commencement of Part 3 of the 2024 Act, can continue under the provisions of the 2000 Act.

Section 13(2) of the 2000 Act requires that public consultation is undertaken for any variation to development plans, during which members of the public and interested parties may make submissions in respect of the proposed variation.

This report has been prepared under Section 13(4) of 2000 Act, which requires the Chief Executive to prepare a CE Report on the proposed variations and to include details of any Submissions/Observations received and to give the response of the CE to each submission. The report has been prepared in the context of the proper planning and sustainable development of the area, taking account of the statutory obligations of the Planning Authority and all relevant national and ministerial policies and objectives.

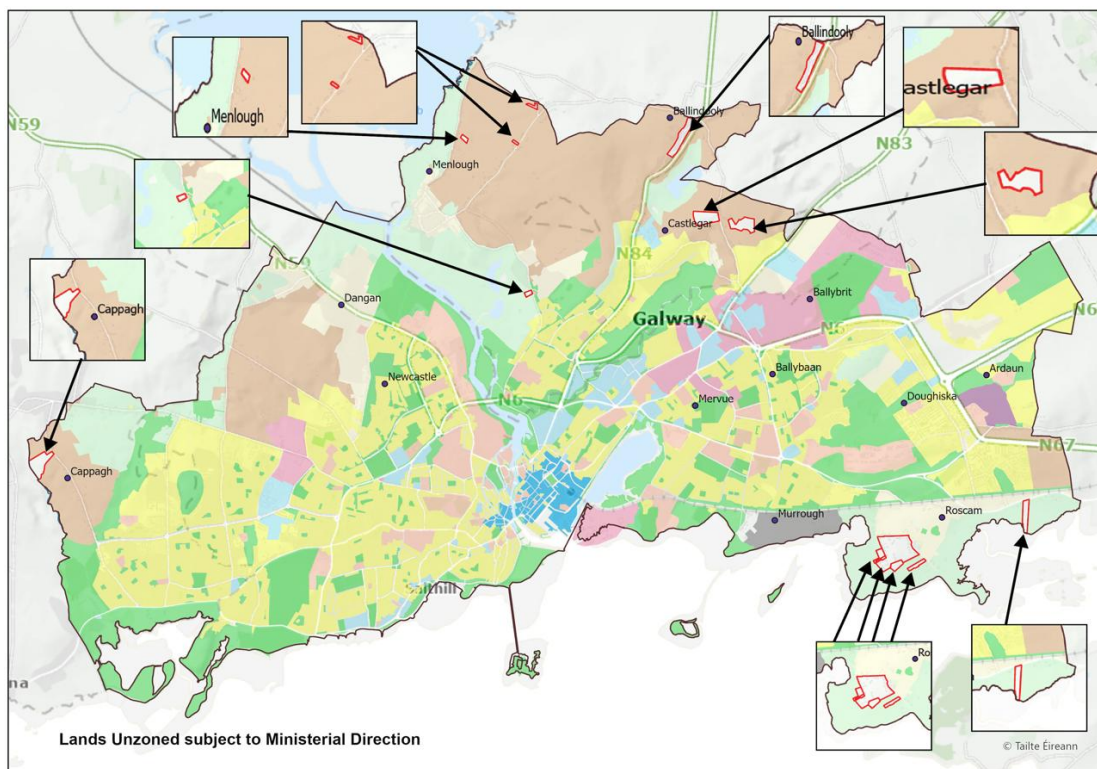
## 1.3 Context

The lands subject to this proposed variation (refer to Section 3.3 & Table No.1 of this report) are currently “unzoned”, in accordance with a Ministerial Direction issued on 3rd May 2023 under Section 31 of the Planning and Development Act 2000 (as amended).

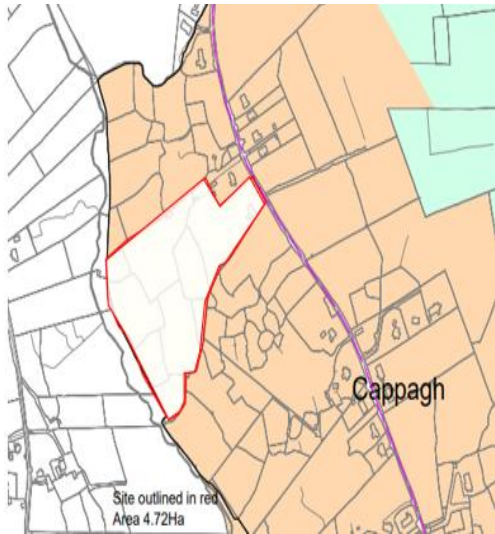
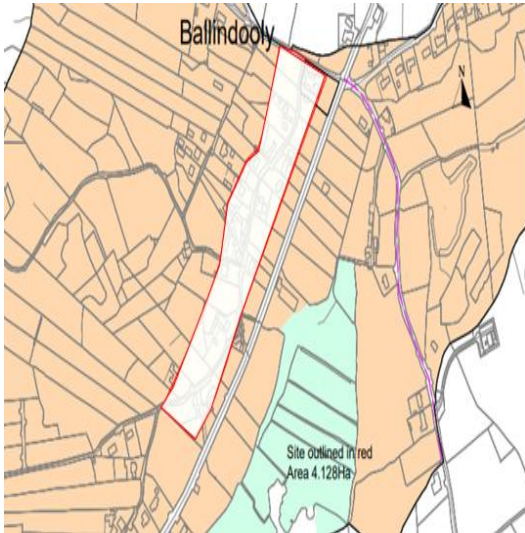
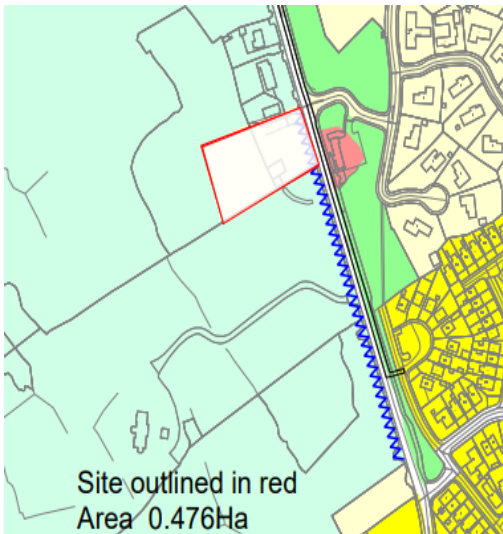
Galway City Council (GCC) proposes to amend the zoning status of the lands previously “unzoned” under the ministerial direction, as GCC considers it appropriate that all lands in the city are subject to a land use zoning objective. Zoning gives clarity and a level of certainty to landowners and third parties in considering the current use and possible future development of the subject lands.

## 1.4 Proposed Variation

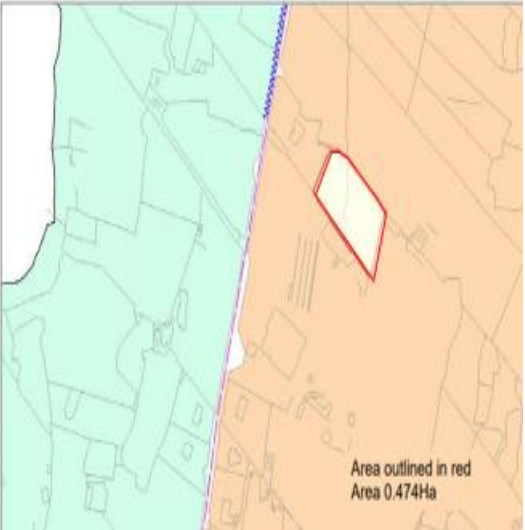

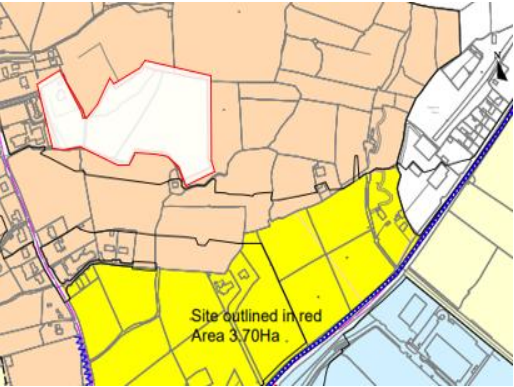
The proposed variation relates to 10 no. “unzoned” land parcels, which are identified below on Map No. 1 - Galway City Development Plan 2023–2029 Land Use Zoning Map.



The “unzoned” lands illustrated above are shown on a site-by-site basis, in Table No. 1 below. This table also provides the site area of each site, along with the proposed land use zoning. In each case, the proposed land use zoning is either Agriculture (A) or Agriculture High Amenity (G). This variation is to the land use zoning map only and does not relate to the written statement.

	Lands	Area	Proposed zoning
1.	<b>Cappagh Road</b>  <p>Site outlined in red Area 4.72Ha</p>	4.72ha	<b>Agriculture (A).</b>
2.	<b>Ballindooly</b>  <p>Site outlined in red Area 4.128Ha</p>	4.128ha	<b>Agriculture (A).</b>
3.	<b>Coolagh Road</b>  <p>Site outlined in red Area 0.476Ha</p>	0.476ha	<b>Agriculture High Amenity (G).</b>



4.	<b>Quarry Road Menlo</b>  <p>Area outlined in red Area 0.474Ha</p>	0.47ha	<b>Agriculture (A).</b>
5.	<b>Two sites on Monument Road Menlo</b> 	Northern lands: 0.45ha  Southern lands: 0.2ha	<b>Agriculture (A).</b>
6.	<b>Off School Road Castlegar</b>  <p>Site outlined in red Area 3.70Ha</p>	3.70ha	<b>Agriculture (A).</b>

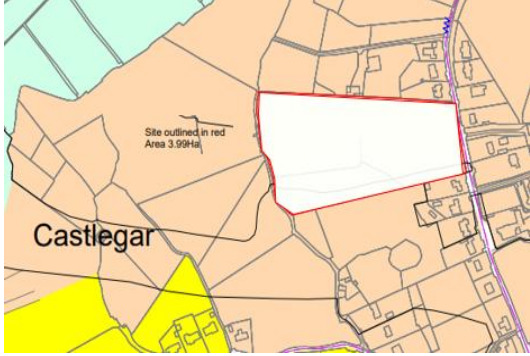
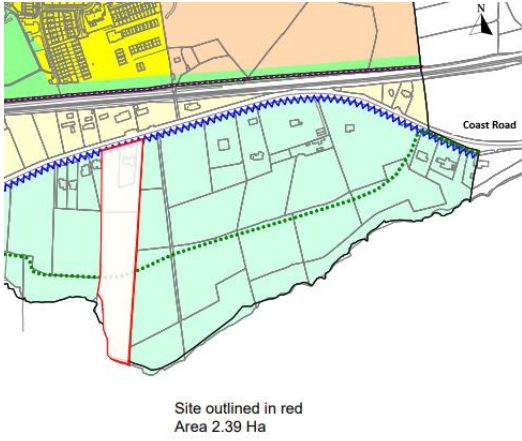


7.	<b>School Road Castlegar</b> 	3.99ha	<b>Agriculture (A).</b>
8.	<b>Coast Road</b> 	2.39ha	<b>Agriculture High Amenity (G).</b>
9.	<b>Roscam</b> 	Northern lands: 0.95ha  Southern lands: 1.145ha	<b>Agriculture High Amenity (G).</b>
10	<b>Roscam</b> 	Northern lands: 12.68ha  Southern lands: 0.91ha	<b>Agriculture (A).</b>

Table No. 1 - 10 no. "unzoned" land parcels subject to variation No. 2

## 1.5 Consultation Process

Notice of the proposed variation was published in the Galway Advertiser / online on 27/11/2025 and sent to the Office of the Public Regulator, the Regional Assembly and the Minister for Housing, Local Government & Heritage and other prescribed bodies in accordance with section 13 of the 2000 Act. Documents were made available online, and hard copies were on public display at City Hall and a number of libraries and community centres around Galway City.

The consultation period for the proposed variation was between 28<sup>th</sup> November 2025 and 5<sup>th</sup> January 2026. The aim of this consultation was to enable the public and interested parties to give their observations on the proposed variation.

A total of twelve submissions were received during the consultation period with respect to the proposed variation. The table below lists the submission references and name of each person/organisation who made submissions. Section 2 of this report gives summaries of the submissions and the response of the CE to any issues raised.

## 1.6 List of Submissions to the Proposed Variation No. 2

Submission Reference	Name of the Person/Organisation
GLWC-C34-1	Nora Gill
GLWC-C34-2	Office of Public Works
GLWC-C34-3	Office of the Planning Regulator
GLWC-C34-4	Uisce Éireann
GLWC-C34-5	Save Roscam Peninsular
GLWC-C34-6	Dr. James McCarthy
GLWC-C34-7	Ceaphach Developments Ltd
GLWC-C34-8	Proofridge Ltd
GLWC-C34-9	Declan & Bernadette Ashe
GLWC-C34-10	Transport Infrastructure Ireland
GLWC-C34-11	J Collins
GLWC-C34-12	Liam Dilleen

Table No. 2 – List of submissions received



## **1.7 Next Steps**

The Elected Members on receipt of this CE Report are obliged to consider the proposed variation and the contents of the CE Report. The legislation requires this to be completed not later than 6 weeks after the submission of the CE Report to the Members. The Members may then by resolution make the variation with or without modification, or the Members can refuse to make the variation.

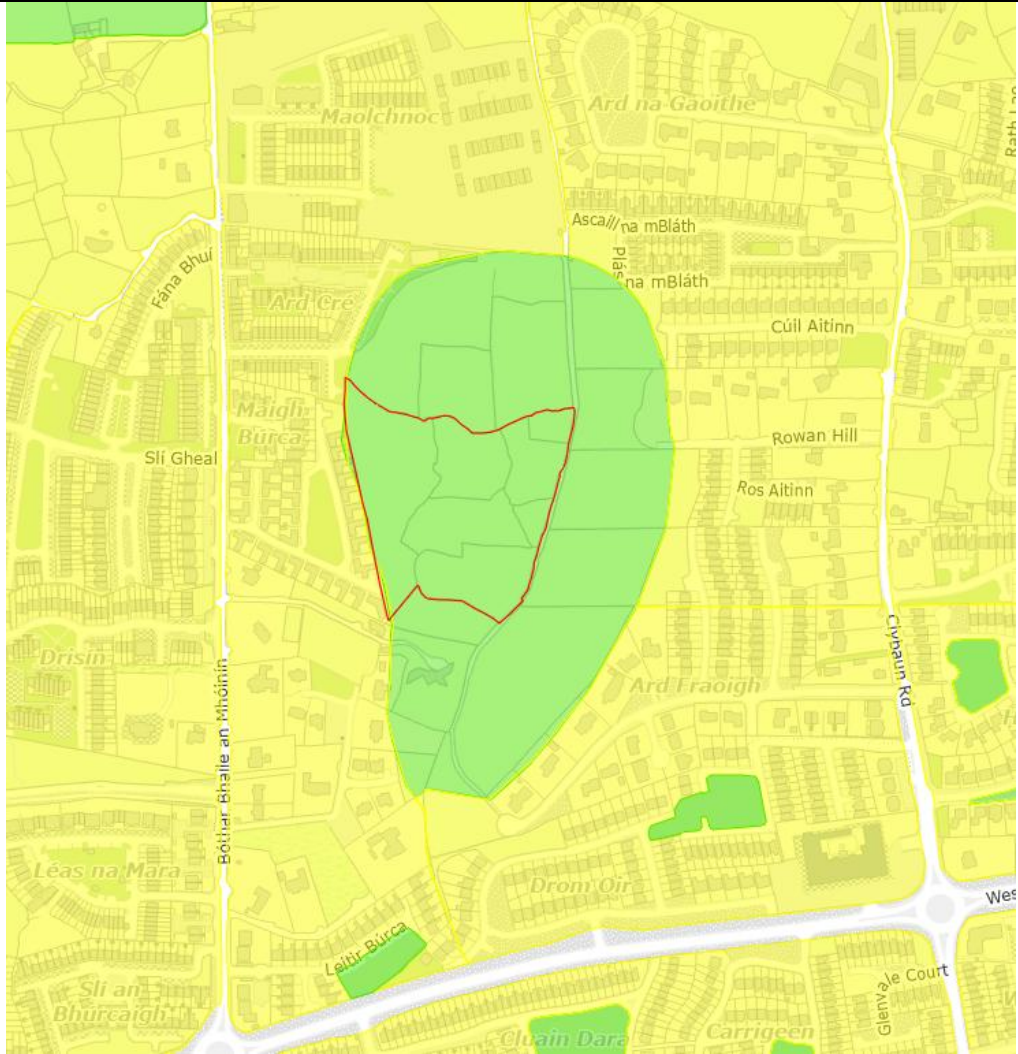
The Elected Members are in receipt of the CE Report as of 30th January 2026. This means that under the relevant legislation the decision whether or not to vary the Plan must be decided within 6 weeks of receipt of the CE Report. It is proposed to be considered at the March 2026 Plenary Meeting.

In advance of a decision on the proposed variation, it is a statutory requirement to determine if a Strategic Environmental Assessment (SEA) and/or an Appropriate Assessment (AA) are required. SEA and AA screening assessments were carried out and concluded that full SEA/AA assessments were not required in relation to the proposed variation. All environmental assessment documentation was made available for consultation in tandem with the details of the proposed variation. Screening Determinations are included in Appendix Two.

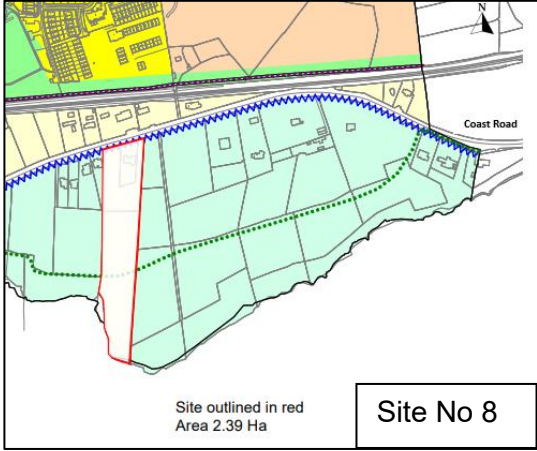
## 2. Submission Summaries and Chief Executive's Response and Recommendations

Summaries of the submissions received in respect of variation no. 2 are set out below followed by the response and recommendation of the Chief Executive.

<b>Reference</b>	GLWC-C34-1
<b>Submission By</b>	Nora Gill
<b>Submission Summary</b>	<p>Nora Gill proposes that the lands off Ballymoneen Road should be rezoned from Natural Heritage, Recreation and Amenity (RA) to Residential (R) zoning.</p> <p>The submission highlighted the NPF's target to grow the city by 36,000 residents by 2040, with half of new units being within existing built-up areas to promote compact growth aligned with national policy.</p> <p>The submission noted that this site is within the city's existing footprint, and with its size it could support over 150 residential units making a huge contribution to the government's housing acceleration plan and housing needs.</p> <p>The submission discusses how the area is well connected to existing electrical and communication transmission services as well as having sufficient access to water supply and drainage services, with these being less available in other parts of the city.</p> <p>The submission refers to the existing services that are in the nearby area such as schools, public transportation, as well as mentioning the new bus network which will travel throughout the city and to a major employment site in Parkmore.</p> <p>The submission also mentioned proposed services and the recently approved neighbourhood centre close to this site.</p>

	
<b>Response</b>	<p>Noted – This submission, requesting the rezoning of land zoned for recreation and amenity purposes, is related to land outside the scope of this variation and it is considered that the proposal to change the zoning of this RA land is not appropriate at this time. The appropriate land use objective for these lands may be considered as part of an upcoming statutory review of the City Development Plan.</p>
<b>Recommendation</b>	<p>It is recommended to make the variation without this change.</p>

<b>Reference</b>	GLWC-C34-2
<b>Submission By</b>	Office of Public Works
<b>Submission Summary</b>	<p>The Office of Public Works (OPW) submission focuses on flooding and flood risk management.</p> <ul style="list-style-type: none"> <li>Most changes arising from the variation are unlikely to affect flood risk.</li> </ul>

	<ul style="list-style-type: none"> <li>Site No. 8 (Coast Road) (map reproduced below for reference) overlaps with areas of flood risk, which may increase in the future due to climate change.</li> </ul>  <ul style="list-style-type: none"> <li>Site proposed rezoning is Agriculture High Amenity (G). <ul style="list-style-type: none"> <li>Agriculture is less vulnerable but unsuitable in Flood Zone A.</li> <li>Agriculture (G) Zoning permits public utilities (highly vulnerable), which are inappropriate in Flood Zones A and B.</li> </ul> </li> <li>GCC should consider water-compatible zoning or attach a policy objective to manage flood risk.</li> </ul> <p>Any future zoning changes in flood risk areas should include:</p> <ul style="list-style-type: none"> <li>A detailed flood risk assessment.</li> <li>Justification in line with national flood risk management guidelines.</li> </ul>
<b>Response</b>	<p>Noted.</p> <p>Galway City Council (GCC) will determine whether the proposed Variation would or would not be likely to have significant effects on the environment and, in so doing, GCC will take account of relevant criteria set out in Schedule 2A '<i>Criteria for determining whether a plan is likely to have significant effects on the environment</i>' of the Planning and Development (SEA) Regulations, as amended.</p>
<b>Recommendation</b>	<p>In response to the OPW submission, the following local objective/measure may be attached to Site No. 8 Coast Road:</p>

	<p>“In compliance with the Flood Risk Management Guidelines, uses under the Agriculture High Amenity (G) zoning objective at this site shall be limited to water compatible uses in Flood Zone A, and less vulnerable or water compatible uses in Flood Zone B subject to site specific flood risk assessment.”</p> <p>The above is considered a non-material amendment.</p>
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<b>Reference</b>	GLWC-C34-3
<b>Submission By</b>	Office of the Planning Regulator
<b>Submission Summary</b>	The OPR is of the view that the proposed zoning amendments do not raise any concerns in relation to consistency with the legislative and policy requirements and with respect to the subject lands accord with the Ministerial Direction as issued on 3 <sup>rd</sup> May 2023. The OPR is of the view that no recommendations or observations are warranted.
<b>Response</b>	Noted.
<b>Recommendation</b>	No changes to the proposed variation.

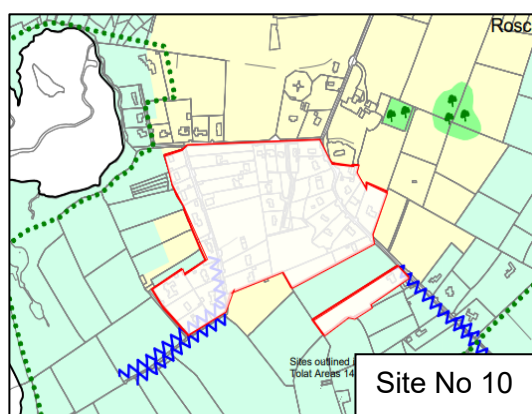
<b>Reference</b>	GLWC-C34-4
<b>Submission By</b>	Uisce Éireann
<b>Submission Summary</b>	Uisce Éireann supports the zoning of the 10 no. parcels of land and have no other comments on the variation.
<b>Response</b>	Noted.
<b>Recommendation</b>	No changes to the proposed variation.

<b>Reference</b>	GLWC-C34-5
<b>Submission By</b>	Save Roscam Peninsula
<b>Submission Summary</b>	<p>The submission makes the following observations:</p> <ol style="list-style-type: none"> <li>1. Case law requires decision-makers to unambiguously identify the reason(s) for zoning alterations affecting individual properties. The variation consultation documentation does not provide adequate</li> </ol>



and unambiguous rationale for the proposed zoning of each individual site. As a result, it is not possible for members of the public to formulate an informed response on the proposed variation.

2. In Table No. 1 of the variation report, the maps presented in rows 9 and 10 (maps reproduced below for reference) show the incorrect zoning for Roscam. Drawn from the Ministerial Direction, the maps refer to the zoning uses of the 2017–2023 plan and not the 2023–2029 plan, which raises confusion and a certain lack of clarity.



3. Save Roscam Peninsular considers that the variation is consistent with the Core Strategy and housing supply of the 2023-2029 plan.
4. Support the proposed variations at sites 1 (Cappagh Road), 2 (Ballindooley), 3 (Coolagh Road), 4 (Quarry Road, Menlo), 5 (Two sites on Monument Road, Menlo), 6 (Off School Road, Castlegar), 7 (School Road, Castlegar), 8 (Coast Road), and 9 (Roscam).
5. Requests that the land at site 10 (two sites at Roscam) be rezoned to Agriculture and High Amenity (G) rather than to Agriculture (A) for the following reasons:

	<ul style="list-style-type: none"> <li>• The submission agrees with the variation consultation documents that the lands under site 10 are not required to meet the housing targets as set out in the Core Strategy, noting that they are physically removed from existing transportation networks and essential services and facilities.</li> <li>• The submission states that rezoning from U to G would be consistent with various local and national policies and guidance.</li> <li>• In respect of the smaller of the two areas under site 10, the submission states that it is greenfield land with an existing dwelling located in a G zoning area, which was rezoned from G to LDR in the 2005-2011 plan. It goes on to note that due to the previous LDR zoning it remains oddly excluded from the Green Network map even though it is surrounded by the Green Network. It finally notes that the site is located in an un-serviced area with high concentration of on-site wastewater treatment in close proximity to areas of high environmental sensitivity such as Galway Bay SAC and SPA.</li> <li>• In respect of the larger of the two areas under site 10, the submission states that the lands are greenfield lands with some existing dwellings, surrounded and adjoining G zoning areas, and adjacent to the Green Network. The submission goes on to state that Roscam Village's high amenity value is based on its acting as an ecological corridor between Roscam Point and Merlin Park Woods and the presence of the old Roscam Village settlement and nearby recorded monuments. It notes that the NPWS recorded the presence of a bat roost in the Village in 2022.</li> <li>• The submission notes that there is high archaeological potential in the Roscam Peninsular Area with the likely presence of sub-surface archaeological artefacts, which any development may impact.</li> <li>• The submission finally states that these lands have a distinctive rural character and established community, heritage and biodiversity, concluding that the zoning of the village ought to</li> </ul>
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	<p>preserve its historic pattern of development while providing better and increased access to local natural amenities and facilities.</p>
<b>Response</b>	<p>1. While the Ballindooley Order determined that the removal of zoning was unlawful in respect of the Ballindooley site, it does not, in and of itself, provide a basis for questioning the legal status/validity of the unzoned status of other lands under the Development Plan. The requirement to provide reasons discussed in the Ballindooley case was with respect to Ministerial Directions under section 31 of the Planning and Development Act 2000 (as amended), rather than development plan variations under section 13 of the Act.</p> <p>Notwithstanding the above, while the reasons for the zoning alterations were not explicitly stated for each individual ownership, the reasons for the variation were set out in the consultation document and applied to each ownership area. It is considered that the information provided is sufficient to enable members of the public to make a submission with respect to the proposed variation and clearly signals the intent of the proposed variation and rationale for same.</p> <p>2. Noted. It is considered that the mapping provided in support of Variation No. 2 is clear, accurate and unambiguous. Section 3.3 of the Variation Report confirms that <i>“the proposed variation relates to 10 no. ‘unzoned’ land parcels, which are identified below in Map No. 1”</i>. Each of the relevant sites are outlined with a red boundary line and easily distinguishable on the accompanying maps.</p> <p>Table No. 1 further reinforces this clarity by presenting each site individually, again with a red boundary line, and by specifying both the site area and the proposed rezoning. While the maps for Sites 9 and 10 include lands outside the red line boundaries, reflecting land-use objectives that existed prior to the 2023 Ministerial Direction, it remains the case that the mapping clearly and accurately identifies the specific sites to which the proposed variation relates.</p> <p>For the avoidance of doubt, a revised map of land parcel No. 9 and 10 (i.e. Map No. 9 (Rev) and 10 (Rev)) is shown in Table No. 3 on</p>

	<p>page 19, with all relevant sites clearly identifiable and all lands reflecting their current land use designations as set out in the Galway City Development Plan 2023–2029.</p> <p>3. Noted.</p> <p>4. Noted.</p> <p>5. While both A and G land use designations allow for agricultural development, as outlined under section 5.9 and 11.2.3 of the City Development Plan, lands designated as G are lands which have important landscape and aesthetic value, which distinguishes them from less visually sensitive A zoned agricultural lands. It is highlighted that, whilst both A and G land use designations allow for agricultural development, as outlined under Section 5.9 and 11.2.3 of the City Development Plan, the A designation allows for a broader range of related development than that of the G designation. Under Section 5.9, it is stated “The policy of the Council for agricultural zones is to facilitate the continued use of these lands for agricultural purposes and limited development, subject to the protection of designated ecological sites, environmental considerations and to control non-agricultural development”.</p> <p>The historic zoning of these lands in previous development plans is not considered to be relevant, and Section 10(8) of the Planning and Development Act 2000 provides that there is no presumption in law that the zoning of their land will persist from one development plan to the next.</p> <p>It is noted that these lands are not currently included in the Green Network due to their previous LDR zoning. It is common for Agricultural A zoned lands to be included in the Green Network where appropriate. Likewise, an Agricultural A use would not stop the lands from acting as an ecological corridor between Roscam Point and Merlin Park Woods. The Green Network as itemised in the City Development Plan does not necessarily determine the desired or existing land use objective of all land uses within the City Development Plan.</p>
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	<p>It is acknowledged that these and nearby lands have historic and archaeological amenity value, however these elements have protection from harmful development as set in Chapter 6 of the development plan, and do not preclude an Agricultural A use. Bats and their habitats are also protected under other policies which would be implemented through the development management process.</p> <p>Acknowledging that both land parcels are bound by G designated lands, it is considered appropriate that the Agriculture A land use objective is the most appropriate for both for the following reasons:</p> <p>Northern lands (12.68ha): This area is characterised predominantly by a preponderance of dispersed one-off rural-type homes on large individual plots mixed with some agricultural lands. Ad hoc and uncoordinated servicing (footpaths and lighting) of some of these dwellings has occurred. While low, well managed, hedgerows allow distant views towards Galway Bay, the existing nature and pattern of development on these lands mean that that it does have capacity to support the limited class of development that are consistent with the land zoning objective Agriculture A, subject to siting and design assessments at application stage.</p> <p>Southern Lands (0.91ha): While bound on three sides by land zoned G in the current City Development Plan, on site inspection it was considered that the presence of an existing dwelling on site and strong boundaries north and south meant that the lands have capacity to support the limited class of development that are consistent with the land zoning objective Agriculture A, subject to siting and design assessments at application stage.</p>
<b>Recommendation</b>	No change to the proposed variation.




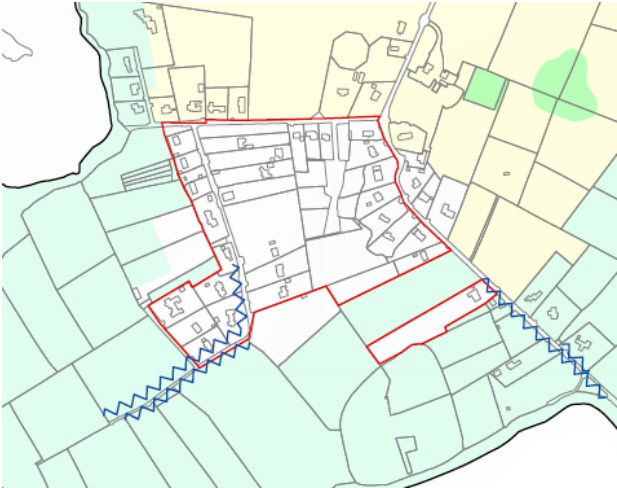
	<b>Lands</b>	<b>Area</b>	<b>Proposed zoning</b>
<b>9 (Rev)</b>	<b>Roscam</b> 	Northern lands: 0.95ha  Southern lands: 1.145ha	<b>Agriculture High Amenity (G).</b>
<b>10 (Rev)</b>	<b><u>Roscam</u></b> 	Northern lands: 12.68ha  Southern lands: 0.91ha	<b><u>Agriculture (A).</u></b>

Table No. 3 – Revision to land parcel maps No. 9 and 10

<b>Reference</b>	GLWC-C34-6
<b>Submission By</b>	Dr. James McCarthy
<b>Submission Summary</b>	<p>This submission provides observations on Proposed Variation No. 1 and Variation No. 2 to the Galway City Development Plan 2023–2029, focused on the Roscam Peninsula. The submission also proposes an additional zoning variation to restore long-standing protections for Greenfield and City Green Network lands, especially the remaining undeveloped areas of the former Rosshill 3-Hole Golf Course. These lands currently hold an ambiguous R2 zoning, lacking biodiversity protections despite their proximity to the EU-protected Galway Bay SAC</p>

and SPA and their importance to the City's Green Network. Restoring G zoning to the undeveloped Rosshill Golf Course lands and nearby areas, which had this zoning for many decades before the 2005–2011 Development Plan, would support Galway's 2023–2029 climate, nature, and transport goals.

1. Variation No. 1 – Rezone R2 to A (4.92 ha):

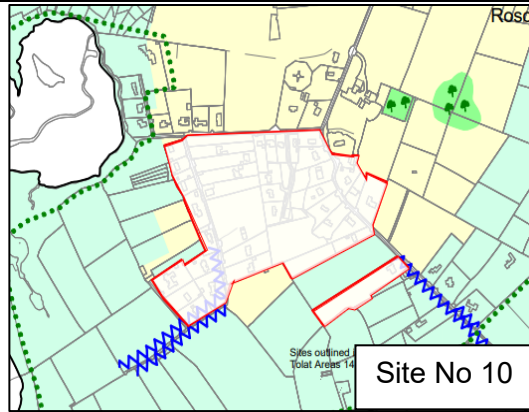
The submission requests that the proposed rezoning from R2 to A be amended instead to G zoning, which historically applied to these lands until the 2005–2011 Development Plan. As part of the Rosshill House Demesne, the lands have amenity and heritage value. G zoning better supports agricultural use and restores stronger nature and biodiversity protections aligned with City climate goals.

2. Variation No. 2 – Material Alteration A.9 (Rezone U to G) (map reproduced below for reference):



The submission supports rezoning the 0.95 ha northern and 1.145 ha southern sites from U to G. These areas are vital components of the Galway City Green Network, containing rich biodiversity, high visual amenity, and significant archaeological potential. The southern site may form part of the 6th-century Roscam Monastic Domain and possibly an earlier Bronze Age settlement. The submission requests clarification of the actual land size, suggesting it may be closer to 1.65 ha.

3. Variation No. 2 – Material Alteration A.10 (Rezone U to A) (map reproduced below for reference):



The submission argues that both the 12.68 ha northern and 0.91 ha southern sites should be zoned G rather than A. The area is largely surrounded by G-zoned land, contains existing dwellings, and forms part of the Galway Greenway Network. The remaining Greenfield lands lack essential infrastructure and are not required to meet housing targets. The area also contains heritage features, including the former Roscam Village site and a derelict brownfield area needing restoration.

Additional Proposed Variation – Restore G Zoning to Roscam Peninsula Lands:

The submission urges the City Council and state planning bodies to introduce a new variation restoring G zoning to all remaining undeveloped golf course lands. This supports climate, biodiversity, heritage, and sustainable transport objectives.

This proposal is reinforced by:

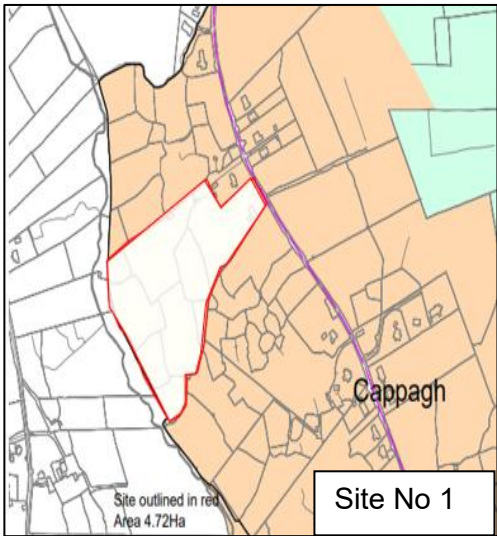
- Note 1: Logical restoration of proper planning and zoning
- Note 2: The lands lie beside EU-protected SAC and SPA habitats requiring strong ecological buffers.
- Note 3: Rezoning was previously blocked by a Judicial Review of the 2021 SHD permission.
- Note 4: Heritage features, including a historic dovecote, lack independent assessment and face construction impacts. Works outside the 20/21 Planning Permission red-line boundary were deemed “temporary,” raising concerns about long-term landscape damage.
- Note 5: The lands are essential for delivering the Oranmore–Galway Greenway.

	<ul style="list-style-type: none"> <li>Note 6: They form a critical link in the Galway City Green Network, necessary for a functional coastal wildlife corridor.</li> </ul>
<b>Response</b>	<p>It is noted that this submission addresses both Variation No. 1 and Variation No. 2. The response provided here will focus on the aspects relating to Variation No. 2, while the elements pertaining to Variation No. 1 have been addressed in the Chief Executive's Report for Variation No. 1.</p> <p>Previous zoning:</p> <p>The historic zoning of Rosshill 3 Hole Golf Course lands in previous development plans is not considered relevant. Section 10(8) of the Planning and Development Act 2000 (as amended) clearly states that there is no presumption in law that the zoning of land will continue from one development plan to the next.</p> <p>Rezone:</p> <p>While both A and G zoning objectives permit agricultural development, lands zoned G are specifically identified for their important landscape and visual amenity value, distinguishing them from A-zoned agricultural lands that are less sensitive in aesthetic terms.</p> <p>Regarding the Galway City Green Network, Agricultural A-zoned lands are frequently included within the network where appropriate. Similarly, an Agricultural A zoning does not prevent lands from functioning as an ecological corridor.</p> <p>It is acknowledged that these and adjoining lands have historic and archaeological amenity value. However, such features are safeguarded under existing policies in the City Development Plan and do not preclude an Agricultural A zoning objective.</p> <p>In response to the request for clarification regarding the actual land area and the suggestion that it may be closer to 1.65 hectares, the site has been re-examined. The mapping confirms a land area of 1.145 ha, as identified in the <i>Southern Lands</i> section and shown on Map No. 1 and Table No. 1. of the public Variation report. Please note that accurate on-site surveying by a suitably qualified surveyor would provide further accuracy and clarification in this regard, however the accuracy of</p>

	<p>available mapping is sufficient and appropriate for the strategic land use purposes of the City Development Plan.</p> <p>Additional Proposed Variation:</p> <p>As set out in the variation documentation, following the removal of the zoning by the Ministerial Direction it is considered appropriate to apply a zoning objective to all land in the city. This variation is focused on those unzoned areas and is not considering the zoning of surrounding areas.</p> <p>Furthermore, Residential 2 (R2) areas are located primarily on the city's periphery and are characterised by historic, low-density development patterns arising from past deficiencies in infrastructure and service provision, as well as environmental and heritage sensitivities. While these areas do not represent the most sustainable form of development under current national and regional policy, they retain potential for limited, sensitive infill and consolidation within their nodal settings. Any such proposals will be subject to rigorous assessment by Galway City Council (GCC), safeguarding environmental, visual, and heritage sensitivities. Development will only be facilitated where it can be assimilated appropriately in terms of design, layout, and amenity without detracting from the established character of the area.</p> <p>GCC is now operating within a substantially revised planning context regarding the former Rosshill 3 Hole Golf Course lands, which are zoned R2. This new context is shaped by the recent update of the National Planning Framework and the publication of the <i>NPF Implementation Guidelines: Housing Growth Requirements for Planning Authorities under Section 28 of the Planning and Development Act 2000 (as amended)</i>, July 2025. These guidelines require development plans to align with updated NPF housing targets, which estimate a need for approximately 50,000 additional households per year to 2040. The request to introduce a new variation reinstating G zoning for undeveloped golf course lands is therefore not supported.</p> <p>While the submission references biodiversity and heritage considerations, these matters are comprehensively addressed through</p>
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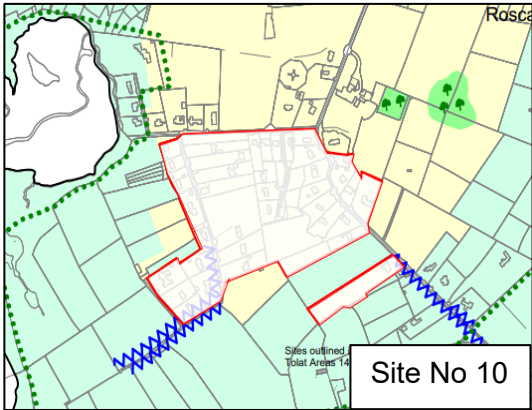
	existing policies for the Green Network, Natura 2000 sites, and heritage protection measures.  Therefore, GCC does not support the proposed additional variation as outlined in the submission.
<b>Recommendation</b>	No change to the proposed variation.

<b>Reference</b>	GLWC-C34-7
<b>Submission By</b>	Ceaphach Developments Ltd
<b>Submission Summary</b>	<p>This submission relates to lands fronting onto Cappagh Road which form part of Site No. 1 set out in Table No. 1 and reproduced below for reference.</p>  <p>The submission seeks Residential zoning of the subject lands as part of Variation No. 2, arguing that the site is peri-urban rather than remote, lies approximately 1 km from the north-western edge of Knocknacarra and 1.2 km from the Western Distributor Road, and would represent a natural and logical extension of the existing suburban area.</p> <p>The lands are described as scrubland of poor agricultural quality with blanket peat and low productivity, and it is stated that zoning for agriculture is neither logical nor reflective of the landowner's intentions.</p> <p>The planning history notes that the lands were previously zoned Low Density Residential (LDR/R2) in the 2017–2023 City Development Plan, with a specific objective allowing development at up to 2.5 houses per</p>

	<p>hectare, and that permission for 11 houses (reg. 19/176) was refused by Galway City Council solely on the basis of public health (on-site effluent treatment) and Cappagh Road capacity/standard, not on the planning principle of housing on the site. The submission records that the Minister's Section 31 Direction for the 2023–2029 Plan deleted the R2 zoning and specific objective, rendering the lands unzoned, and that Variation No. 2 now proposes Agricultural zoning.</p> <p>The submission emphasises national and regional policy changes, particularly the revised National Planning Framework (2025) and the “NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities 2025”, arguing that increased population and housing growth targets, together with provision for up to 50% headroom in housing land, justify additional residentially zoned land in Galway. It contends that the current Core Strategy is based on the 2018 NPF and now understates housing needs, and that additional residential zoning, including this site, is necessary to meet revised targets and headroom requirements.</p> <p><b>Location, services and technical matters</b></p> <p>The report highlights Knocknacarra's extensive range of retail, community and social facilities and its strong public transport provision (multiple bus routes), stating that the site's proximity to these services means future residents would not be reliant on the city centre for daily needs and could travel sustainably by bus. It argues that the site is not within or adjacent to Natura 2000 sites, is not flood-prone, is outside zones of archaeological potential, and contains no protected structures or national monuments, and is therefore physically suitable for housing.</p> <p>In relation to previous refusal reasons, the submission notes Irish Water's 2022 “confirmation of feasibility” indicating that a housing development (c.40 units) can be facilitated by connection to a 225 mm sewer on Cappagh Road via a new pumping station and gravity sewer funded by the developer, and that a water connection is feasible without network upgrade. It also references the City Development Plan objective to audit and improve local roads, including Cappagh Road, and</p>
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	suggests that residential development could help fund necessary upgrades, turning a current constraint into an opportunity.
<b>Response</b>	<p>Noted</p> <p>Having regard to the semi-rural, unserved nature of the site, the infrastructural deficiencies on Cappagh Road, the availability of residentially zoned and more appropriately located lands elsewhere in the city, particularly in the context of compact growth and sequential development principles set out in national, regional and local policy, it is considered that the residential zoning of these lands would not constitute proper planning and sustainable development.</p> <p>The lands in question are in a semi-rural, backland location, on a substandard local road, removed from the main public transport, walking and cycling networks serving the city.</p> <p>The site is currently unserved by public wastewater infrastructure; development would depend on significant new off-site infrastructure and/or non-standard solutions.</p> <p>Compact growth and the sequential approach require any additional housing to be focused on serviced or readily serviceable infill/brownfield lands within the existing built-up footprint, not on peripheral, unserved edge-of-city sites, which would result in piecemeal development.</p> <p>Previous Chief Executive reports for Cappagh and similar locations have found such rezonings to be unsustainable, car-dependent, piecemeal and contrary to national and regional policy where ample zoned and serviced residential land already exists elsewhere in the city, this remains the case at this point in time.</p> <p>The historic zoning of lands in previous development plans is not considered relevant. Section 10(8) of the Planning and Development Act 2000 (as amended) clearly states that there is no presumption in law that the zoning of land will continue from one development plan to the next.</p> <p>The lands form part of a wider open tract at the western fringe that provides an important landscape and buffer function; the designation of</p>

	lands for residential development would erode this role, create pressure for further ad-hoc residential expansion along Cappagh Road and constitute an unsequential and unsustainable form of city extension inconsistent with clear NPF objectives around Compact Growth and Sustainable Transport.
<b>Recommendation</b>	No change to the proposed variation.

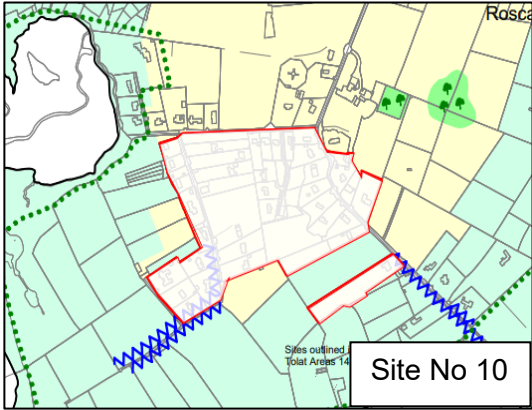
<b>Reference</b>	GLWC-C34-8
<b>Submission By</b>	Proofridge Ltd
<b>Submission Summary</b>	<p>The submission seeks Residential (R2) zoning for a site within Roscam, which is proposed to be rezoned from unzoned to Agricultural A in variation 2 (part of site 10 – reproduced below for reference). The submission argues that the proposed Agriculture use would be unsustainable and inconsistent with the national housing policy, zoning history of the site and the prevailing pattern of development in the area.</p>  <p>The submission further seeks the insertion of a specific objective in respect of this site to allow for a maximum density of 12 units per hectare, subject to connection to the public sewerage system.</p> <p>The subject site is described as bounded by detached houses to the north, east and west, with the northern side adjoining the Ros Odhran Estate road and the southern adjoining a greenfield development site. It is stated that the subject site has both infill and brownfield site characteristics, where National and Regional planning policy direct new residential development.</p>

	<p>The submission describes the lands as located within the envelope of Galway City and located within an established residential cluster. It considers the proposed Agricultural zoning to be contrary to the Sustainable Residential Development and Compact Settlements Guidelines, stating the Residential R2 zoning would be more in keeping with the existing and emerging character of the area, and consistent with the aforementioned Guidelines and the principles of compact growth.</p> <p>The site is described as entirely serviceable, mentioning an agreement for the lands to be connected to the public sewer via the Ros Odhrain and the permitted SHD development to the north, and water main connection from the Ros Odhrain estate immediately north, meaning there would be no risk of ground water pollution and or Appropriate Assessment / Environmental Designation concerns arising from an R2 zoning.</p> <p>The submission goes on to explain that the site has access onto a local county road to the north and is in close proximity to potential corridor routes for the proposed 'Galway to Athlone Cycleway' project, and states that the locational advantages of the area for strategic sustainable connectivity to Galway City and intervening amenities adds further support to the proposed R2 zoning.</p> <p>The zoning history of the site is detailed explaining that prior to the Ministerial Direction, the Council were supportive of an R2 zoning with a specific objection, and that the site has been zoned Low Density Residential from 2005-2023.</p> <p>It is further explained that the subject lands were purchased as a development site, at a time where they were zoned for residential. The submission explains that in acquiring the lands there was an expectation that they would be fully developed for residential purposes, with the first four units in Ros Ohdrain, and the roadway, footpaths and water services to the undeveloped site provided, and that the proposed Agricultural zoning would unreasonably depreciate the value of the lands.</p>
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	<p>Finally, it is noted that approximately 85% of the lands in site 10 are currently used for existing residential purposes, while other lands to the north and north-east are proposed to retain their current R2 zoning despite being used for agricultural purposes.</p>
<b>Response</b>	<p>As set out in the variation documentation, following the removal of the zoning by the Ministerial Direction it is considered appropriate to apply a zoning objective to all land in the city. This variation is focused on those unzoned areas and is not considering the zoning of surrounding areas.</p> <p>When looking at lands for zoning, National policy requires local authorities to follow compact growth principles and undertake a sequential approach, with serviced or readily serviceable infill/brownfield lands within the existing built-up footprint and in more central lands brought forward as a priority.</p> <p>The subject land in question is a greenfield site, on the edge of an area of detached houses on the outskirts of Roscam, predominantly surrounded by agricultural land. It is located in a periphery area of the city, outside of the defined residential suburbs and outer suburbs.</p> <p>Notwithstanding the potential for connection to the public sewer network via the currently under construction residential development to the north, it is considered to be poorly serviced in terms of transport by virtue of the rural nature of the roads serving the site directly, notably Rosshill Road which has no footpaths or lighting (outside of the Ros Ohdrain estate), and its remove from pedestrian and public transport networks.</p> <p>Having regard to the semi-rural nature of the site, the land available, and the infrastructural deficiencies presently on Rosshill Road, it is considered that the site would be unable to deliver medium to high density compact growth or form comprehensive urban extension.</p> <p>The rezoning of these lands as Residential land use at this point in the Development Plan cycle would represent haphazard and uncoordinated development and not constitute proper planning and sustainable development.</p>

	Section 10(8) of the Planning and Development Act 2000 provides that there is no presumption in law that the zoning of their land will persist from one development plan to the next.
<b>Recommendation</b>	No change to the proposed variation.

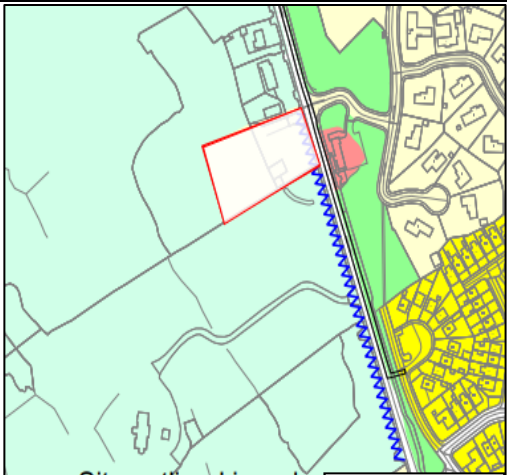
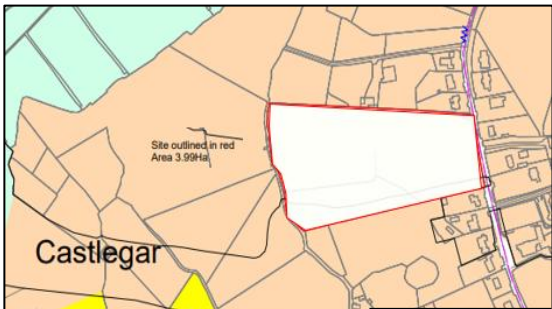
<b>Reference</b>	GLWC-C34-9
<b>Submission By</b>	Declan & Bernadette Ashe
<b>Submission Summary</b>	<p>This submission relates to lands forming the southern area of Site No. 10 (map reproduced below for reference).</p>  <p>The submission states that Variation No. 2 offers an opportunity to reinstate the original residential zoning (R2/Residential) of these lands, which were unzoned by Ministerial Directive (3/5/2023) after adoption of the City Development Plan on 24/11/2022.</p> <p><b>Basis for Request:</b></p> <ul style="list-style-type: none"> <li>• In line with High Court Case JR Ballindooley Developments Ltd v Minister for Housing [2023/745], where Ministerial unzoning was quashed and R2 zoning reinstated (19/5/2025).</li> <li>• Reinforces limitations on Ministerial Directions overriding local plans.</li> <li>• Reflects notice on City website confirming adoption of the Plan on 24/11/2022.</li> <li>• Similar harm caused by unzoning of 10 parcels (Table 1, GCC Final Report).</li> <li>• Natural justice: fairness and justification were absent; retired citizens lacked resources for court action.</li> </ul>

	<ul style="list-style-type: none"> <li>• The State recognises residential zoning as an asset for tax purposes; ownership cannot be summarily removed without communication, negotiation, and remedy.</li> <li>• Lands had LDR zoning in all previous plans (2005–2023).</li> </ul> <p>Introduction:</p> <p>The submission states the lands were zoned LDR since 2005 until unzoned by Ministerial Direction after the Plan’s approval. Variation No. 2 proposes Agricultural/Amenity zoning instead of restoring previous residential zoning, contrary to the High Court precedent.</p> <p>Detail:</p> <p>Maps show the property location and previous zoning. The submission states the Ministerial Direction followed OPR advice, without notifying landowners. A prior submission (20/3/2023) received no response.</p> <p>History of Zoning and Planning:</p> <ul style="list-style-type: none"> <li>• Family home built in 1988 with planning permission.</li> <li>• Lands zoned LDR in 2005–2011 after Council vote.</li> <li>• 2008 application for three houses refused.</li> <li>• 2017: architect engaged for downsizing; pre-planning meeting indicated support.</li> <li>• Health issues and pandemic delayed plans.</li> <li>• OPR lobbying in 2021–2022 escalated changes, removing local input.</li> <li>• Notice confirmed adoption of Plan (24/11/2022); lands retained R2 zoning.</li> <li>• Minister issued Draft Direction (13/1/2023); consultation closed before owners were aware.</li> <li>• Final Direction (May 2023) unzoned lands without specific reason.</li> </ul> <p>Issues:</p> <ul style="list-style-type: none"> <li>• Need to downsize while retaining family home.</li> <li>• Housing shortage outweighs rationale for Agricultural zoning.</li> <li>• Incoherent zoning: adjacent lands retain residential zoning; large new house approved nearby.</li> </ul>
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	<ul style="list-style-type: none"> <li>• Private lobbying influenced OPR; landowners' rights ignored.</li> <li>• De-zoning caused severe personal and financial harm.</li> <li>• Variation No. 2 offers no remedy.</li> <li>• Unzoning worsens housing crisis, undermines confidence, and diminishes Council authority.</li> </ul> <p>Appendix:</p> <p>High Court decision quashed Ministerial Direction, restored zoning, and required Council amendments.</p>
<b>Response</b>	<p><b>Ballindooley Order:</b></p> <p>While the Ballindooley Order determined that the removal of zoning was unlawful in respect of the Ballindooley site, it does not, in and of itself, provide a basis for questioning the legal status/validity of the un-zoned status of other lands under the Development Plan. The requirement to provide reasons discussed in the Ballindooley case was with respect to Ministerial Directions under section 31 of the Planning and Development Act 2000 (as amended), rather than development plan variations under section 13 of the Act.</p> <p>Notwithstanding the above, Galway City Council has also discharged all statutory and procedural obligations in respect of zoning lands and the Residential Zoned Land Tax (RZLT). Accordingly, it is considered that the processes are compliant with applicable legal and planning requirements.</p> <p>Previous zoning - LDR zoning in all previous plans (2005–2023):</p> <p>The historic zoning of lands in previous development plans is not considered relevant. Section 10(8) of the Planning and Development Act 2000 (as amended) clearly states that there is no presumption in law that the zoning of land will continue from one development plan to the next.</p> <p>History of Zoning and Planning / Issues, etc.:</p> <p>Noted.</p> <p>As outlined in the variation documentation, following the removal of zoning under the Ministerial Direction, it is now considered appropriate</p>

	<p>to apply a zoning objective to all lands within the city. In determining suitable zoning, national policy requires local authorities to adhere to compact growth principles and implement a sequential approach, prioritising serviced or readily serviceable infill and brownfield sites within the existing built-up footprint and more central locations.</p> <p>The subject lands comprise mainly of a greenfield site situated to the rear of a detached house on the outskirts of Rosshill, on the Roscam peninsula, predominantly surrounded by agricultural land. The site lies in a rural character area of the city, outside the defined residential suburbs and outer suburbs.</p> <p>Therefore, in this context, rezoning the subject lands for Residential (R2) use is not supported, as it would lead to haphazard, piecemeal development, would fail to deliver the medium to high density compact growth or form a comprehensive urban extension, as required under the National Planning Framework and the NPF Implementation Guidelines (July 2025), and would further undermine the planned settlement strategy and amenity functions of high amenity and agricultural lands.</p>
<b>Recommendation</b>	No change to the proposed variation.

<b>Reference</b>	GLWC-C34-10
<b>Submission By</b>	Transport Infrastructure Ireland
<b>Submission Summary</b>	<p>The submission from TII highlights two specific sites – Site No. 3 (Coolagh Road) and Site No. 7 (School Road, Castlegar) (both maps reproduced below for reference) – which adjoin or encroach on the preliminary alignment of the N6 Galway City Ring Road (GCRR) scheme. TII considers that the implications of the proposed designations for these parcels on the N6 GCRR scheme are unclear and require clarification.</p>

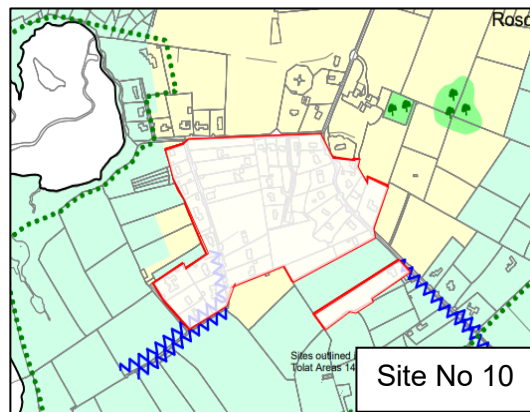
	<div data-bbox="432 143 940 678">  <div data-bbox="758 616 940 678"> <p>Site No 3</p> </div> </div> <div data-bbox="432 712 986 1084">  <div data-bbox="805 1019 986 1084"> <p>Site No 7</p> </div> </div> <p data-bbox="427 1122 1430 1489">The submission cites Section 2.9 of the Section 28 “Spatial Planning and National Roads Guidelines for Planning Authorities” (2012), which states that zoning and other development objectives must not compromise the route selection process for national roads and that inappropriate zoning can increase land acquisition costs, undermine value for money, and potentially render a road project uneconomic or lead to its alteration or abandonment.</p> <p data-bbox="427 1525 1430 1671">TII notes that it is not evident from the Variation No. 2 documentation that these guideline considerations have been addressed in relation to Sites 3 and 7.</p> <p data-bbox="427 1706 1430 1910">TII therefore seeks clarification on how the proposed zoning of these parcels has considered the N6 GCRR and recommends consultation with the N6 GCRR Project Team to ascertain any implications for the scheme before adopting Variation No. 2 as it relates to these sites.</p>
<b>Response</b>	Noted



	<p>Having regard to the strategic importance of the N6 GCRR, the nature and land use zoning objective of agriculturally zoned lands i.e. 'to provide for the development of agriculture and to protect the rural character', and the existing policy framework to safeguard the route corridor, It is considered that Proposed Variation No. 2, as it relates to Site No. 3 Coolagh Road and Site No. 7 School Road Castlegar, does not give rise to conflict with Section 2.9 of the Spatial Planning and National Roads Guidelines.</p> <p>The purpose of Variation No. 2 is to apply appropriate land use zonings (Agriculture in this case) to lands that became unzoned following a Ministerial Direction.</p> <p>In the case of Site No. 3 (Coolagh Road) and Site No. 7 (School Road, Castlegar), the proposed A designations are considered to be compatible with the safeguarding of the N6 GCRR route, as they do not confer development potential of a type or scale that would prejudice the delivery, value for money or alignment options of the scheme.</p> <p>The Development Plan already includes specific objectives to reserve and protect the approved N6 GCRR corridor from adverse development, and any future proposals on these lands will continue to be assessed having full regard to those objectives and to and relevant National Guidelines.</p> <p>The Planning Authority will continue to consult with the N6 GCRR Project Team and TII at plan and project level to ensure that land use designations and any subsequent planning applications do not compromise the implementation of the scheme</p>
<b>Recommendation</b>	No change to the proposed zonings is therefore recommended.

<b>Reference</b>	GLWC-C34-11
<b>Submission By</b>	J Collins
<b>Submission Summary</b>	The submission welcomes the proposals to provide zoning for the unzoned lands to provide clarity on land use but raises concerns over the Agricultural A zoning proposed for site 10 (map reproduced below for

reference). It goes on to propose that the lands within the boundary of site 10 be returned to Low Density Residential zoning.



It begins by detailing the zoning and planning history of the lands. It notes that the lands were zoned Low Density Residential from 2011 until the draft 2023-2029 development plan, and that this zoning was removed by ministerial direction. It references planning applications for residential development which have been granted in the lands and surrounding area since 2011.

It goes on to state that a zoning of Agriculture has been proposed for the unzoned lands, noting that no rationale has been provided for adopting the proposed agricultural zoning.

The current land use for site 10 is detailed, stating that approximately 1.68 of the 13.59 hectares is used for agriculture while the rest comprises residential, partially completed residential, scrub lands and public roadways. It notes that the lands to the north and northeast have retained their residential zoning and that they are currently used for agricultural purposes.

The submission proposes that site 10 of the variation be returned to the Low Density Residential zoning of the previous development plans, reiterating that this use had been in place for the past 14 years.

It states that the move from LDR to Agricultural zoning would be a retrograde step away would be retrograde step for a plan which seeks to ensure sufficient lands zoned for housing needs, referencing Policy 3.1(1) Housing Strategy of the 2023-2029 development plan.

	<p>The submission claims that approximately 89% of the lands in site 10 are currently used for existing residential purposes which provides potential for 60 dwellings, at a rate of 5 dwellings per hectare, to be constructed on the footprint of the existing Roscam Village, which would be lost under the proposed Agricultural zoning.</p> <p>It goes on to opine that, given the current housing crisis and the increased dwelling delivery requirements of the revised NPF and ministerial guidance, that the proposed Agricultural zoning does not align with local or national policies.</p> <p>The submission references the Ballindooley Court order which reverted the unzoning of one site in Coolagh which had been unzoned in the same ministerial order as the sites in the proposed variation. It claims that the variation lands should be reverted to the previous zoning objective as per the court order in relation to the Coolagh lands, and that to change the zoning from that adopted in the draft development plan would be unfair on the landowners of the Roscam area, and no clear reason has been provided for the proposed zoning.</p> <p>The submission finally references a specific area of land within site 10, which was granted planning permission in 2016. It states that significant works have progressed on site, but were halted due to Covid 19 delays and the subsequent unzoning of the land. It further states that the land is surrounded almost entirely by residential development, is serviced by an existing water main and public road, and has sufficient space for wastewater treatment, and is suitable for rapid construction of 3 dwellings due to the previous works undertaken on site.</p>
<b>Response</b>	<p>Section 10(8) of the Planning and Development Act 2000 provides that there is no presumption in law that the zoning of their land will persist from one development plan to the next.</p> <p>As set out in the variation documentation, following the removal of the zoning by the Ministerial Direction it is considered appropriate to apply a zoning objective to all land in the city. This variation is focused on those unzoned areas and is not considering the zoning of surrounding areas.</p>

	<p>When looking at lands for zoning, National policy requires local authorities to follow compact growth principles and undertake a sequential approach, with serviced or readily serviceable infill/brownfield lands within the existing built-up footprint and in more central lands brought forward as a priority.</p> <p>The lands in question are located in a periphery area of the city, outside of the defined residential suburbs and outer suburbs, and at a remove from services and pedestrian and public transport networks. They are considered to be poorly serviced in terms of transport by virtue of the rural nature of the Rosshill Road leading to the site, which has no footpaths or lighting. Recent refusals in the area also raise concerns over the cumulative impact of developments with on-site wastewater treatment on Galway Bay Special Area of Conservation, and there is currently no access to the public sewer in proximity.</p> <p>With respect to the legal challenge of the Ministerial Direction, while the Ballindooley Order determined that the removal of zoning was unlawful in respect of the Ballindooley site, it does not, in and of itself, provide a basis for questioning the legal status/validity of the un-zoned status of other lands under the Development Plan.</p> <p>Having regard to the semi-rural nature of the site, the land available, and the infrastructural deficiencies on Rosshill Road, it is considered that the site would be unable to deliver medium to high density compact growth or form comprehensive urban extension.</p> <p>The rezoning of these lands as Residential land use would represent haphazard and uncoordinated development and would be contrary to the proper planning and sustainable development of this particular area.</p>
<b>Recommendation</b>	No change to the proposed variation.

<b>Reference</b>	GLWC-C34-12
<b>Submission By</b>	Liam Dilleen
<b>Submission Summary</b>	This submission relates to the lands forming the southern area of Site No. 9 as set out in Table No. 1 (map reproduced below for reference).



The submission notes that the Ministerial Direction deleted the previous LDR zoning objective, leaving the lands unzoned in the adopted Plan, and that Variation No. 2 now proposes an Agriculture High Amenity (G) zoning; instead, the submission seeks Residential zoning, arguing that the site is a logical extension of the existing suburban area of Roscam and would support compact growth and additional housing within the city boundary.

The lands are described as a flat, c.1.2 ha site at Rosshill, on the south-eastern edge of the city, contiguous with existing detached dwellings and within convenient distance of schools, healthcare, shops, childcare, recreational facilities and employment in Roscam, Doughiska and Galway City. The submission notes access to bus services on the Old Dublin Road, proximity to Oranmore rail station, and the proposed coastal greenway, supporting the argument that the lands are suitable for a plan-led residential neighbourhood rather than an agricultural high amenity designation.

The planning history records three permissions granted by Galway City Council for a one-off dwelling and associated wastewater treatment, all refused on appeal by An Bord Pleanála, initially on public health/groundwater grounds and later on ecological grounds, with MKO contending that the identified issues have since been addressed through further hydrological and ecological work. That survey work is summarised as showing that the site is separated by over 225 m of agricultural land from the Galway Bay Complex SAC and Inner Galway Bay SPA, has no direct watercourse connectivity, does not contain qualifying habitats or significant habitat for SCI bird species, and can

	<p>accommodate an on-site treatment system without adverse effects on the receiving environment in accordance with EPA Codes.</p> <p>In policy terms, the submission argues that Residential zoning would better align with the NPF (including the First Revision 2025), the RSES/MASP (where Roscam is referenced as part of a strategic growth area), and the Core Strategy and housing policies of the Galway City Development Plan, particularly objectives for compact growth and delivery of new homes within the built-up footprint. The removal of the earlier LDR/family-only objective is accepted as appropriate in response to OPR Recommendation 5; however, MKO emphasise that the OPR did not require an Agricultural or Agriculture High Amenity zoning and that the Ministerial Direction simply deleted the LDR objective, leaving the lands unzoned pending review.</p> <p>MKO submit that applying an Agriculture High Amenity (G) zoning to these previously unzoned lands would be inconsistent with the Core Strategy, the Development Plan Guidelines 2022 and the established suburban context, and that a standard Residential zoning represents the most appropriate and sustainable outcome for the subject site.</p>
<b>Response</b>	<p>Noted</p> <p>The Galway City Development Plan 2023-2029 supports the development of residentially land in a plan-led, sequential manner on serviced or readily serviceable lands within the existing built-up footprint and in locations well served by sustainable transport.</p> <p>The lands are semi-rural in character, located on a local road network with limited capacity and removed from the main public transport, pedestrian and cycle networks serving the city.</p> <p>The site is currently unserved by public wastewater infrastructure and would be reliant on individual on-site treatment systems, which is not appropriate for urban development and has previously been identified as acceptable only in exceptional circumstances.</p> <p>National and regional policy on compact growth seeks additional housing on serviced or readily serviceable infill/brownfield lands within</p>



	<p>the existing built-up footprint, not on unserved edge-of-city sites that would generate car-dependent patterns of development.</p> <p>It is highlighted that previous Chief Executive assessments for Rosshill/Roscam and similar locations have concluded that residential/LDR zoning on such lands would result in piecemeal and un-coordinated development, which would undermine the core/settlement strategy and be contrary to the proper planning and sustainable development of the area.</p> <p>The current development plan / core strategy incorporates undeveloped residential zoned sites throughout the city, which are more suitable and better located to deliver the compact growth and medium-high density residential development required in the NPF and recent Section 28 guidelines.</p> <p>In line with those principles and having regard to the site's semi-rural context, infrastructural deficits, proximity to sensitive coastal and landscape assets, and the continued availability of more suitable zoned and serviced lands elsewhere in the city to deliver compact growth, Residential zoning of these lands at this point in the development plan cycle is not appropriate and would be contrary to the proper planning and sustainable development.</p> <p>Section 10(8) of the Planning and Development Act 2000 provides that there is no presumption in law that the zoning of their land will persist from one development plan to the next.</p>
<b>Recommendation</b>	No change to the proposed variation.

## **Appendix 1 - Proposed Variation (No. 2) Consultation Report**

## **Appendix 2 – Screening AA Report and Determination**

## **Appendix 3 – Screening SEA Report and Determination**