
Galway City Community Network

The Public Participation Network in Galway City

Submission on the draft of

Ireland 2040

The National Planning Framework

About GCCN

Galway City Community Network is the Public Participation Network in Galway City. Established in 2014, it represents over 120 groups and organisations in the community, voluntary and environmental sectors in Galway City. The twin objectives that GCCN pursues are to

- Advance the values of sustainability, equality, culture, community, empowerment and inclusivity and embed these in the policies, programmes and practice of local government, state organisations, national government and civil society;
- Develop and implement progressive models of and approaches to representation, participation and engagement for civil society in informing and shaping policy development and implementation.

Introduction

This submission has three objectives:

1. To highlight several overarching concerns which should be incorporated into the current draft of the NPF;
2. To respond directly to the planning indicators for Galway given in the NPF.

GCCN also made a submission to the pre-draft consultation stage for the National Planning Framework where we addressed our full range of concerns across a board set of policy issues. That submission is available online [here](#).

1. Overarching concerns

1.1 Include 'Community' as a key element of the NPF vision

GCCN welcomes the holistic vision for Ireland which is presented in the National Planning Framework. In particular, we note the importance placed on community, land and place as a 'hallmark of being Irish' (p. 16) and the detailed consideration of community in chapter five, including National Policy Objective 25 on community development.

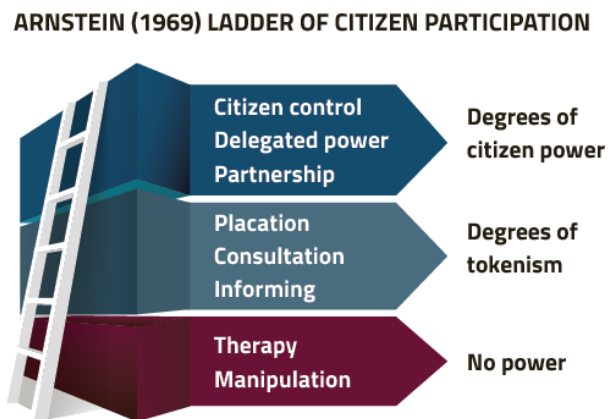
All of this highlights the importance of sustainable communities at the centre of good planning and at the heart of a just and inclusive society. GCCN shares the draft NPF's concern for the promotion of community development as an essential process supporting the empowerment of communities.

GCCN feels that the importance and the value of community should be underscored by the inclusion of community as one of the key elements in the NPF vision as set out on p. 18.

1.2 Address participation, consultation & the right to have a say in the implementation, monitoring and evaluation of the National Planning Framework

GCCN is concerned that the current draft of Ireland 2040 does not adequately consider how the public will be engaged in decision making around the implementation, monitoring and evaluation of the NPF and the other plans and processes in the planning hierarchy established by the NPF. Measures which address participation, consultation and the right to have a say on all developments should be identified and prioritised in the NPF.

GCCN proposes “Arnstein’s ladder” as a framework for assessing the effectiveness of public participation in decision making. The NPF should seek to empower communities and move towards the highest rungs of the ladder.



GCCN considers that community development, which the NPF recognises as a key tool for the empowerment of communities, is an effective approach to supporting better and more inclusive public participation in decision making. The NPF should reference and complement the Government’s (2015) Framework Policy for Local and Community Development. In designing participation processes, particular attention must be paid to communities that are marginalised such as Travellers, women, lone parents, asylum seekers, migrants, the LGBTQI community, etc.

1.3 Give due consideration to the legal duties of all public bodies with regards to equality and human rights

The NPF should include an explicit and detailed statement of how it has due regard for the implementation of the Public Sector Duty in the implementation of the Ireland 2040 vision and all planning measures arising from it. The Public Sector Duty is placed on a statutory footing by Section 42 of [the Irish Human Rights and Equality Act 2014](#), which states:

- “42. (1) A public body shall, in the performance of its functions, have regard to the need to:
1. eliminate discrimination,
 2. promote equality of opportunity and treatment of its staff and the persons to whom it provides services, and
 3. protect the human rights of its members, staff and the persons to whom it provides services.

The act also states that all public sector bodies must assess, identify and address human rights and equality issues relevant to their functions in strategic planning processes, policies, practices and reporting.

2. Planning indicators for Galway

The NPF identifies a set of “Key future growth enablers for Galway”. These are listed in the table below along with GCCN’s comments on each ‘growth enabler’. These comments have been collaboratively drafted in a process of discussion and engagement with our SPC representatives and members of our Environmental Linkage Group.

“Growth enablers”	GCCN comment
<p>Delivering a number of regeneration projects for the provision of new development to extend and intensify the City Centre, including the Station, Docks and Headford Road areas.</p>	<p>GCCN welcomes this as a first step towards the creation and sustaining of living communities in the city centre and implementing the Galway City Development Plan’s policy to ‘protect and enhance city centre residential areas by discouraging encroachment from commercial development and unacceptable infill developments’¹.</p> <p>We are concerned that there is a current decline in population from city centre communities that needs to be reversed to protect the city residential areas as living communities. For example, we note that that the DEDs of Bohermore and Ceannt Station Foster Street & 3 other city areas have seen a decline in population amounting to 1058 since the 2011 census.</p> <p>Regeneration project in the city should prioritise the building of homes and the creation of liveable communities in the city centre area. Housing stock should include high numbers of social and affordable housing which are constructed based the population demographics of the City Council housing waiting list.</p> <p>Finally, GCCN is concerned that there should be full, open and participatory public consultation process on all regeneration projects in the city, making use of innovative participatory planning approaches blending both community development and the use of open technologies.</p>

¹ Galway City Development Plan , ‘Policy: 2.8 City Centre Residential Area’ , available here:

http://www.galwaycity.ie/uploads/downloads/development_plan/2017-2023/Galway%20City%20Development%20Plan%202017-2023.pdf

	<p>The areas of regeneration under consideration would effectively double the area of the existing medieval city centre. This represent a once-in-a-lifetime opportunity for development of the city and for engaging the people and communities of Galway in visioning the for the city.</p>
<p>Identifying infill and regeneration opportunities to intensify housing and employment development throughout inner suburban areas.</p>	<p>In line with the NPF’s stated aim to prioritise develop existing brownfield sites, as well as the need to balance urban and rural development, the focus of development should be first and foremost in the centre of the city and in the outlying towns, before the provision of an additional urban centre on a current greenfield site at Ardaun.</p> <p>The population in the centre of the city has declined significantly in recent years, and the community in the city core has effectively been hollowed out. A vibrant city requires that people live in the centre. GCCN urges the NPF to focus efforts on providing the opportunities for people and communities to live in the centre.</p> <p>Infill and regeneration opportunities should prioritise the development of sustainable, liveable communities in the city centre.</p>
<p>Progressing the sustainable development of new greenfield areas for housing and the development of supporting public transport and infrastructure, such as at Ardaun.</p>	<p>Once again, the focus of development should be first and foremost in the centre of the city and in the outlying towns, before the provision of an additional urban centre on a current greenfield site at Ardaun.</p> <p>A complementary focus for development should be on the towns on the outskirts of the city, such as Athenry, Ballinasloe and Tuam, with a significantly improved public transport system to ensure people can access the city and predicated on economic development in these areas to avoid commuting as much as possible.</p> <p>GCCN believes that Ardaun is not the most appropriate location for a new greenfield urban centre. We recommend a comprehensive approach to planning for Galway City, which requires planning beyond the city boundaries and considering all lands around the city for alternative locations for residential development. The current county/city boundary should not be treated as a limiting factor in searching for more suitable locations.</p> <p>GCCN’s submission on the Ardaun development is available here: https://tinyurl.com/ydgaox8w</p>

<p>Improving access and sustainable transport links to, and integration with, the existing employment areas to the east of the City at Parkmore, Ballybrit and Mervue.</p>	<p>Sustainable transport links are key to the sustainable development of Galway City and the realisation of the requirements for transport sector decarbonisation which will be addressed in the sectoral plans of the forthcoming National Climate Change Adaptation Plan. Sustainable transport links should be developed based on the hierarchy of road users in the following order:</p> <ol style="list-style-type: none"> 1. Pedestrians and people with disabilities; 2. cyclists; 3. Public transport; 4. private motor transport. <p>GCCN encourages the NPF the endorsement in the development of the European Charter of Pedestrian Rights and the Road Danger Reduction Charter. Furthermore, this action needs to include a stated reference to the National Cycle Policy Framework. It cannot be left to the city executive to define what is meant by sustainable transport links.</p>
<p>The continued expansion of the city's third level institutions and integration with the city and region.</p>	<p>The expansion of third level institutions should be undertaken with due regard for urgent need for housing in Galway City. Student accommodation should not be prioritised ahead of housing for families and individuals on the housing waiting list or experiencing homelessness.</p>
<p>Determining the sustainable future development of the Galway Airport site for employment and/or residential use together with supporting facilities and infrastructure.</p>	<p>The development of the lands at the former Galway Airport should be include provisions for use as a Light Rail Depot/Terminus with Park & Ride facilities.</p>
<p>Provision of a Citywide public transport network, with enhanced accessibility between existing and proposed residential areas and the City Centre, third level institutions and the employment areas to the east of the city.</p>	<p>Light rail should be prioritised as the most sustainable public transport system given Galway City's projected growth in population over the course of the lifetime of the National Planning Framework. There are clear examples of light rail being the most effective solution for silimiar size cities in Europe, For example, a new Light Rail system was recently installed in Angers, France is a town similar in size to what Galway is expected to grow to by 2040 - 158,000 people, and is a great success.</p> <p>In addition to a Park and Ride facility at the former Galway Airport, lands should be reserved for a depot on the Westside of the city at Cappagh for a terminus.</p>

<p>Public realm and urban amenity projects, focused on streets and public spaces, particularly in support of an extended city centre area and where residential and employment areas can be linked to pedestrian routes.</p>	<p>The plan must prioritise the protection and promotion of Merlin Woods and Terryland Forest Park as the city's "green lungs".</p>
<p>Development of a strategic cycleway network with a number of high capacity flagship routes.</p>	<p>What is needed for cycling in Galway is the city-wide implementation of the National Cycle Policy Framework. For decades the city has been characterised by the systematic creation of a built environment that is hostile to walking and cycling. Superimposing a limited number of cycleways on top of this is a poor use of money unless underlying problems are addressed first.</p> <p>It is arguably pointless creating a "strategic cycleways" if most people feel they need to drive to them by car before they can use them by bike. The best way to reverse the ill effects of car-focused town planning is to follow the National Cycle Policy Framework.</p> <p>Following the Framework will in due course lead to strategic cycling routes plus improved cycling and walking conditions city-wide.</p>
<p>Delivery of the Galway City Ring Road.</p>	<p>GCCN believes that the NPF must prioritise investment in public transport first as the primary solution to Galway's traffic congestion issues. The NPF's over-reliance on the provision of</p>
<p>Delivery of the Galway East Main Drainage Waste Water Treatment Plant.</p>	<p><i>No specific comment</i></p>
<p>Ensuring that water supply and waste-water needs are met by new national projects to enhance Galway's water supply and increase waste water treatment capacity.</p>	<p><i>No specific comment</i></p>
<p>Improving sustainability in terms of energy, waste and water, to include district heating and water conservation.</p>	<p>GCCN would like to draw attention here to the work of Transition Galway who have produced <i>A Vision for Galway 2030</i>. This comprehensive visioning document provides innovative solutions to issues of energy, food, waste and water that are appropriate for Galway City. This document is available at the following link: https://transitiongalway.wordpress.com/</p>