



Comhairle Cathrach na Gaillimhe Galway City Council

Draft Regional Spatial & Economic Strategy & Metropolitan Area Strategic Plan Submission to the Northern and Western Regional Assembly



February 2019

Galway City Council welcomes the opportunity to participate in the consultation process on the Draft Regional Spatial & Economic Strategy (RSES) and Metropolitan Area Strategic Plan (MASP). This Council acknowledges the scale of the document of over 300 pages with 215 Regional Policy Objectives and supported by comprehensive environmental assessments.

This submission includes general observations on the Draft RSES and includes specific points which have a direct bearing on the city. As Galway is an identified regional city in the NPF which provides an opportunity to have a MASP that targets significant future growth supported by a strategic vision, this submission gives particular focus to the Draft MASP. Galway City Council considers significant and material changes are required to both the Draft RSES and the Draft MASP to properly and adequately reflect Galway City's role, function and status as envisaged in the National Planning Framework and indeed under Project Ireland 2040. The existing draft documents are not adequate as currently framed to reflect Galway City as the largest urban centre in the NWRA region, the only city in the region, the principal regional growth centre on the west coast one of the five regional cities designated for significant growth under the NPF.

The Elected Members of Galway City Council engaged in a specific workshop on the Draft RSES & MASP and additional points to those set out hereunder are included in Appendix 1, reflecting the view of the Council members as advanced at this workshop. Members of the Planning SPC also discussed the Draft RSES & MASP and additional points are included in Appendix 2.

Draft Galway Metropolitan Area Strategic Plan (MASP)

Concern has been raised by both the council and executive with regard to the limited extent of the MASP boundary. The extension of the MASP boundary to include Maigh Cuilinn would co-ordinate with the Galway Transport strategy (GTS) and would reflect the strong interdependence and shared labour market between the city and Maigh Cuilinn. It would enable key GTS priorities and investment decisions to be aligned with the MASP.

The extension of the MASP boundary to include Athenry should also be very strongly considered. This would give sufficient scale to the MASP and enable the city to become the engine of growth envisaged by the NPF. Athenry functions as an important settlement close to the city and has significant connectivity to the city by rail and motorway. It also includes

significant lands designated as a strategic economic corridor which could accommodate future economic growth interlinked with the city. Non-inclusion of Athenry will fail to address the role of Galway City Galway County and the wider city region in relation to the future economic growth.

The following extracts from the NPF sets the context for the Galway MASP: *“Galway City exerts a strong influence in much of the southern part of this area and a Metropolitan Area Strategic Plan (MASP) will be prepared for the Galway Metropolitan area through the Regional Spatial and Economic Strategy process”*

“Developing and implementing a comprehensive and strategic metropolitan area spatial plan for Galway city, to enable its continued strategic development in a transformational and urban rejuvenation focused manner, with a special focus on capitalising on the potential of underutilised and publicly owned and centrally located sites and activating their potential to boost the population and economic output levels of central areas.” (source: NPF)

Taking the above into consideration the following comments are made in relation to the Draft MASP:

It is considered that the Draft RSES should be extensively revised to include for a separate Galway MASP section that reflects the NPF approach of acknowledging the particularly distinctive strategic capacity of regional cities. The recognition of the potential benefits of having a regional city approach merits it to be separated out from the other settlements referenced in chapter 3 so that the associated development policies can read clearly.

As the NPF gives specific direction for the preparation of a comprehensive and strategic metropolitan area spatial plan for Galway city, the structure of the MASP should reflect this. This would require some standardisation in the framing of the strategic plans for the main settlements of Sligo /Letterkenny /Athlone but should reflect the distinctive difference of the MASP which is a city region plan.

The latter points link with the observations that the Council has made regarding the vacuum in defining a spatial hierarchy in the RSES and the associated targeted population growth ambitions. It is considered that having this explained in earlier chapters would give more context to where the city region of Galway sits and also the other major growth centres.

Specific points

The context of the Galway MASP needs to be placed in context both nationally and regionally. The expression of the MASP in the draft RSES amounts to more of a descriptive context of its merits, laboured more so on the city area, without explaining the vision for the greater City Region and the benefits for having a policy approach to maximising shared resources from a more significant spatial platform of a wider city boundary catchment.

As referenced the MASP should have a more structured framework which establishes a vision for the city region – within the context of the NPF /RSES – this should differ somewhat from that of the City Development Plan in that it is more strategic and is focusing on the

functional ties between the city and its hinterland which, in the context of the RSES, includes for both the spatial and economic dimensions.

In this regard the strategic policies in the City Plan - on settlement, transport, infrastructure economic development, amenity, education and health are all relevant but need to be placed into a realisation of the city region. They need to demonstrate how having shared policies / resources can have greater benefits for the metropolitan area. This in turn will demonstrate the key enablers for metropolitan success predicated on a defined settlement, development and transport strategy both within the city and the county settlements in the MASP area.

There is a need to have a clear and confident statement of what cross administration sharing of vision, resources, and investment will achieve and how these will enhance the competitiveness of the city region over and above the policies in the City Development Plan. It will also establish the priorities for enabling infrastructure and the thrust and direction for investment. In turn, this will link to what is the anticipated targeted growth to be delivered at the appropriate timeframes. This will result in having an implementation strategy that is linked to phased growth. In the absence of this approach either growth will be stifled, unbalanced or growth will come but with negative repercussions. This would suggest a need for a series of development policies to be included in the MASP for both the city and the county settlements.

These need to relate e.g. to the settlement policy challenges including, addressing pressures for rural housing, services and supports for future housing, which include the particular requirements for successful brownfield developments. A MASP in this regard is recognising the particular challenges for transforming to compact sustainable growth.

Similarly the strategic transport demands arising from a shared labour market in the city region needs to show how the current Galway Transport Strategy can effectively impact the success of the city region, countering the current imbalances of economic success but recognising unsustainable consequences, such as severe congestion, impacting both city and county.

These development policies in turn need to be linked to an implementation strategy that provides direction for local regional and national investment that impacts the MASP area. The Council strongly believes and supports the necessary inclusion of an implementation strategy within the MASP and also that provision must be made for an oversight and monitoring regime to oversee the implementation strategy.

Draft Regional Spatial and Economic Strategy (RSES)

The RSES is required to have both a spatial and economic dimension and it must provide a framework for investment to prioritise the delivery of key enabling infrastructure and services. In this regard the Draft RSES would greatly benefit from having an enhanced spatial dimension throughout the document with a clear hierarchy. It should also include clearer priorities in terms of settlement and employment distribution and the associated investment/infrastructural requirements.

The NPF states that the role of the RSES is to give a greater focus at local level to the national policy objectives and national strategic outcomes. The policy framework requires a more specific and stronger focus to the region and in particular the MASP. This will enable greater co-ordination within the region with local authorities required to align their core strategies with detailed regional policy objectives. The Council strongly supports the material amendment of the RSES to reflect this.

It is necessary that the RSES aligns with the NPF. In this regard the definition of the settlement hierarchy should be consistent with the NPF. An example relates to use of the “Metropolitan” designation for areas which are defined as important regional centres but are not of a city region scale. Appropriate amendments must be made in this regard.

As required by the NPF, the format and structure of the three Regional Spatial and Economic Strategies should be consistent. While it is acknowledged that each Regional Assembly area will have its own regional objectives, they should follow a similar structure and content. This will ensure greater consistency and clarity for users and ultimately decision makers.

A critical element of the RSES is to have a detailed Implementation Strategy that provides direction for local, regional and national investment and sets priorities. The implementation section set out in the draft document refers to generic priorities coupled with a standard review and monitoring system. It should include for a sequence of infrastructure prioritisation, delivery and co-ordination which is of vital importance to inform investment decisions.

Specific Points

Sector Development

The section “Galway in Focus” (p44) gives the impression that the city is driven solely by Foreign Direct Investment. Reference should be made to the broader economy in the city and in the MASP area / City region. The service industry including health and the creative industry are examples of sectors that make a huge contribution to the city economy and should be given consideration. The strength and potential of the cultural economy is evidenced in particular by designations such as the UNESCO City of Film and European Capital of Culture. The potential of film, media and entertainment and craft and emerging food industry has potential to add significant value to the economy. Insight Institute in NUIG

in its analysis on behalf of both City and County Local Authorities has identified the potential for a world class creative hub in the city and adjoining region.

Tourism

While tourism is an important sector, it is over emphasised in the document in comparison to other sectors (P168-176) which are as important for successful regional development. The document should capture the importance of city/urban tourism and Galway City's role as a Destination City and as a gateway to the wider region (s). The mid-point location of Galway city along the Wild Atlantic Way should also be recognised, as should the fact that Galway is the only City on the Wild Atlantic Way. Sustainable tourism should also include development and improvement of the way-marked walking ways around the region and in particular the western way. Galway's location on the proposed network of Greenways that will be provided should also be referenced, including Dublin/Galway, Galway/Clifden and Oranmore/Bearna

Marine

Section 4.5.4 Marine- should reference the significant role of research and science in the Fisheries sector and in particular the work of the Marine Institute. An additional resource in the Marine Sector in addition to the Marine Institute and the NUIG Ryan Institute is the Marine and Freshwater Research Centre (MFRC) in GMIT.

Reference should also be made to the significant amenity benefits within the marine sector with a range of beaches (including blue flag beaches) and walkways offering tourism and leisure opportunities.

Galway Port

Regional Policy Objective 61 and 62 in relation to Galway Harbour & Port refers to redevelopment proposals as an *"upgrade"* and a *"100m development"*. The proposal for redevelopment and extension of Galway Harbour is significantly more extensive. It includes for commercial quays, a deep water docking facility, fishing quays and provision of marina and water based sports facilities and involves reclamation of c27 hectares. Reference should be made to the potential to contribute significantly to the economy of both the City and the region, increasing connectivity and contributing to the tourism, enterprise and off shore energy sectors.

Section 2.6 (page 191) in relation to Galway Port should exclude reference to IROPI as the consent process has not been completed and the RSES should not prejudge the outcome.

With regard to governance, it is suggested that wording on p190 that *"It is designated for transfer to Galway City Council"* be amended to state that the governance model for transfer of control to the city council is currently being examined.

Education

In relation to the focus on different sectors, the RSES should reference the important role of education at all levels. In particular, reference should be made to the role of National University of Ireland Galway as the only NUI University in the region and its importance in research and collaboration with industry; through research initiatives such as CURAM and REMEDI programmes and through outreach programmes. The role of the Galway Mayo Institute of Technology is also important to the City and Region and should be referenced. It is renowned for its excellence in the Creative Arts and Digital Media, Entrepreneurship and Gastronomy.

Retail

The section on Retail (page 198) should include a clear retail hierarchy and include consideration of the role that Galway City and other settlements play as key retail centres in the region in accordance with the Retail Planning Guidelines. Retail objective No. 4 should include positive policy to promote and improve the vitality and vibrancy of the city centre and town centres.

Heritage

In relation to the focus on cultural heritage (P209), the document should recognise its value and potential to add significant value to the regional economy. It should include consideration of Galway as European Capital of Culture 2020 and the future legacy for the city, county and the wider region. The City's ten year cultural strategy, *'Everybody Matters'* and the cultural journey through this strategy on which Galway City has embarked should be referenced. Galway is also part of the European Pilot Cities as part of the Culture 21 initiative.

In relation to the focus on the Gaeltacht heritage (page 210/211), it should reference that Galway city is unique in that it is a bilingual City and a significant area of the City has Gaeltacht status. The city is seeking to achieve official status for the City as 'Bilingual Capital of Ireland' reflecting the strong Gaeltacht culture and identity within the City.

In relation to the built heritage (Page 212), in addition to national monuments there are also structures on the Record of Protected Structures (RPS) and Architectural Conservation Areas (ACAs) in each local authority area which enable protection and enhancement of the built heritage. This section should also reference that Galway City is a medieval walled town and that proposals for a Galway City Museum extension to celebrate the medieval town including Town Walls has recently received consent.

The objectives under this section (page 213) should include to maximise the benefits for the region of the unique heritage legacy of Galway city as a Regional City. The RSES should also give consideration and policy support to promote good urban design and architecture in the region.

Specific Projects

In relation to Greenway projects (page 215), reference should be made to the planned Oranmore to Bearna Greenway. Reference should also be made to the planned national Galway to Dublin greenway/cycleway which will traverse East Galway and include towns such as Ballinasloe and Athenry.

In relation to Blueways (page 217), reference should be made to the potential benefits of Galway Bay and coastline for the development of recreation and amenity to serve the city and visitor population.

In relation to International Connectivity (page 226), specific reference should be made to the national road network in the city and region as part of the European Unions (EU) TEN-T transport policy. This policy aims to create connectivity between regions, remove bottlenecks that hamper access to markets and promotes a sustainable multi modal network.

Greater emphasis should be placed on the role of Ireland West Airport Knock as an important international transport hub for both the city and the region and policy support given to expansion of the airport and improved accessibility and transport links in particular to the city - including enhanced public transport and bus timetabling. The role of Shannon Airport is also important to international connectivity in particular from the MASP area and should be referenced. It should be acknowledged that both airports are located along the Atlantic Economic Corridor and the connectivity that they provide has significant economic benefits to the MASP and wider region.

In relation to Galway Port (page 227), reference should be made to its ambitions for redevelopment. Its expanding tourism industry should include reference to cruise liner tourism. Reference should also be made to its potential to support sustainable energy and off shore renewable energy.

Transport Projects

The National Roads Regional Objectives (page 231) should also include the *Completion of the Galway City N6 Corridor Junction upgrades*.

In relation to regional objectives for the rail network, (p223) objectives should also include: *"To support the development of Ceannt Station as a regional multi-modal transportation interchange."*

In relation to regional objectives for the Bus network, objectives should include: *"Delivery of measures including for bus corridors and infrastructure as part of the Galway Transport Strategy and the national BusConnects programme."* (P234)

Waste Management

In relation to waste management (page p281), Objective 1 should include reference to implementation of the strategy and main objective of the plan and not just in terms of infrastructure provision. The objective in relation to siting of waste infrastructure on lands

zoned for industrial use in urban areas is very restrictive and should be omitted. There are other lands that may be appropriate e.g. In Galway city, a waste management facility is also open to consideration on CI and A zoned lands.

Public Realm

The section on quality of life should also include the physical environment and the place-making qualitative standards for places. An attractive physical environment has a huge impact on the quality of a place. It should also acknowledge that these are a key economic attractor and important factors in employment retention. It should reference the importance of public realm and give policy support to promote improvements to public realm areas of all urban settlements. Particular reference should be made to the implementation of a public realm strategy for Galway City Centre.

Smart Cities

The Smart City approach mentioned in Growth Ambition 5 should reference the potential for adaption of Galway to a Smart City standard in the interests of resource management, to enhance the quality and performance of urban services, to reduce costs and to engage more effectively and actively with citizens. Reference in this regard should be made to the work being carried out in NUIG under the Insight Programme – Centre for Data Analytics. Particular reference could be made to the use of and potential for smarter mobility and Intelligent Transport Solutions (ITS) in the city to increase efficiency, safety and co-ordination across transport networks.

Allied to the smart city approach, the section on Telecommunications Infrastructure (page 15) should reference that consent has been issued in 2018 for a sub-sea fibre optic cable connection from Galway to Bilbao to provide high speed telecommunication capacity between Ireland and mainland Europe.

To conclude the submission, it is considered that the specific affirmation in the NPF of the importance for development and investment in regional cities – which includes Galway City - contributing to a better national spatial hierarchy and effective regional planning is not given sufficient weighting in the Draft document. It is requested that the document be amended to include a policy framework which reflects the valuable resource that the city is as a driver of growth in the region.

APPENDIX 1

Regional Spatial and Economic Strategy (RSES) & Metropolitan Area Strategic Plan (MASP)

Workshop Monday 4th February 2019

Additional Comments raised by Elected Members

- The Draft RSES should be revised to include for a comprehensive Galway MASP section that reflects the NPF approach for Galway city.
- The MASP boundary should be extended to include Maigh Cuilinn and Athenry.
- The RSES and MASP needs to be linked to an implementation strategy that provides direction for local, regional and national investment and sets priorities.
- Galway Harbour requires more emphasis in the document.
- Settlement in Ardaun should include for both county and city.
- Need for specific retail strategy that protects city centre uses.
- Climate change impacts should be factored in including for coastal erosion and the Sailín to Silverstrand Coastal Protection project prioritised for investment.
- Economic value and potential of City needs to be emphasised.
- Broad band and wifi capacity needs for the city to be highlighted.
- Capital of Culture and urban tourism and Gaeltacht importance should be emphasised.
- Transport investment in the City and public transport connections to MASP settlements is required.
- Successful compact urban growth can only be achieved with investment in public realm, parks, amenities and recreation.
- Greater emphasis on education and in particular the Connacht Ulster Alliance.
- There is a need to emphasise the huge entrepreneurial work by NUIG and GMIT through their research and innovation.

APPENDIX 2

Galway City Council Planning SPC meeting

8th January 2019

Additional Comments raised by SPC Members

- Concerns with regard to the significant increase in population given the amount of land available in the city.
- Questions why Maigh Cuilinn isn't included in MASP area as it has a similar reliance on the city as Clareglaway, Bearnna and Oranmore.
- The extension of growth into the MASP area raises concerns with regard to access into the city/transportation and even more commuting.
- All these new households will be dependent on the city for employment and therefore will increase commuting into the city.
- Questions what is the purpose of MASP, is it an extension/expansion of the city and how MASP will work in terms of administration, it straddles both city and county.
- Emphasis is needed in the MASP on transportation – how people will commute into the city from the surrounding towns. What is the function of these settlements in the MASP, how much growth can they accommodate. Housing is a key issue with young people having to move further out of the city. Emphasis also needed on other requirements if Galway is going to grow to the extent envisaged – health, education open space.
- RSES must have a strong rural policy and address rural housing. An Taisce are not anti rural housing, but direction is required to build up rural towns and villages and reduce unsustainable one off housing.