



Galway City Community Network
Líonra Pobail Chathair Na Gaillimhe

Galway City Community Network

The Public Participation Network in Galway City

GCCN Submission

Draft Galway City Council Development Plan 2023 – 2029

Established in 2014, Galway City Community Network (GCCN) is the network of community, voluntary and environmental organisations and groups active in Galway City. As the Public Participation Network for Galway City, GCCN is the main link through which the local authority, agencies and the state connect with the community, voluntary and environmental sectors in Galway City. GCCN is committed to contributing to the development and achievement of a vision for the well-being of this and future generations. GCCN welcomes the opportunity to submit to the consultation on the draft Galway City Development Plan 2023-2029.

1: Introduction, Strategic Context & Core Strategy

Strategic Vision for Galway City

Galway is a unique city given its location, unique characteristics and, in particular, its relationship with the river, sea and canals. This should be at the core of the vision for the planning and design of the city and its neighbourhoods.

GCCN requests that the following be included under the **Strategic Goals 1.2:**

1. The Council will set out a vision for planning and design for the city by placing the unique features of Galway, particularly the city's relationship with the river, sea and canals, at the heart of the vision for planning (p.14).

Sustainable Development Goals

The Sustainable Development Goals (SDGs) are mentioned in the Core Strategy of the plan ('implementation of the Core strategy and the policies and objectives of the Development Plan will advance the aims of the UN 2030 Agenda for Sustainable Development') and each chapter title page includes one or more SDG decals. Ireland has committed to achieving the SDGs by 2030. Given that this plan will cover the period up to the beginning of 2029, it is this development plan that must achieve the most progress in realising the goals fully.

However, there are no specific targets or indicators from the Global Indicator Framework included with no evidence as to how the actions relate to the realisation of the goals.

Recommendation:

2. Each chapter in the Development Plan must set out clearly, in measurable terms, how the policies therein are consistent with Ireland's commitment to achieve the SDGs by 2030. Each chapter should include specific actions, targets with indicators from the Global Indicator

Framework which they relate to. These clearly specified indicators can be used to monitor the progress of the Development Plan in achieving the SDGs during its lifetime.

GCCN also requests that the following be added to **Policy 1.1 United Nations Sustainability Goals (p.15)**

3. The Council will identify a range of appropriate indicators, selected from among the SDG Global Framework of Indicators, for each of the SDGs to enable progress towards their achievement to be monitored.
4. All actions will be benchmarked against in the Sustainable Development Goals with targets and evidence as to how the actions relate to the realisation of the goals.

Public Sector Equality and Human Rights Duty

There is no mention of the Public Sector Equality and Human Rights Duty within the plan despite it being referenced in the CE's report: 'A number of submissions make reference to obligations set out under the UN Sustainable Development Goals, Public Sector Equality and Human Rights Duty and the UN Convention on the Rights of People with Disabilities (UNCRPD).'

The Public Sector Equality and Human Rights Duty ('the Duty') places a statutory obligation on public bodies to eliminate discrimination, promote equality of opportunity and protect the human rights of those to whom they provide services and staff when carrying out their daily work. It puts equality and human rights in the mainstream of how public bodies execute their functions. This is a legal obligation and it originated in Section 42 of the Irish Human Rights and Equality Act 2014.

The Galway City Development Plan needs to take cognisance of the Duty in its design implementation and monitoring and that the human rights and equality concerns of the communities identified by the Duty and named in Irish equality legislation are assessed, addressed and reported on in all planning.

Recommendation:

5. The following specific policy must be included in the Development Plan in **Chapter 1**: The Council will undertake its required Public Sector Duty Assessment, across all aspects of the Councils responsibilities, within year 1 of the new plan being adopted.

UN Convention on the Rights of People with Disabilities (UNCRPD)

GCCN welcomes the commitment to 'work with relevant stakeholders to support the implementation of the UNCRPD at local level'. However, legally it is Galway City Council's duty to implement the UNCRPD to ensure the full equality of people with disabilities in Galway City. The language in the plan should reflect this legal obligation and be changed from 'to support the implementation' to 'to implement'.

Recommendations:

GCCN request that Inclusion of the following under **Policy 7.3 Inclusive City**:

6. The Council will develop a comprehensive Access Strategy through engagement with disabled people and disability organisations.
7. The Council will establish a coordination mechanism in line with requirements set out in UNCRPD. The Council will appoint a dedicated Access Officer to implement the Access Strategy

2: Climate Action

The plan acknowledges the government's declaration of Climate and Biodiversity Emergencies. However, it lacks the required sense of urgency given the scale of the twin crises we are facing. It is not clear that the Council understands the seriousness of the consequences of the twin crises if effective actions are not taken. It is imperative that clear targets and dates are set. The recent IPCC report contains a clear warning that we have only 3 years left in which to commence significantly reducing greenhouse gas emissions to avoid unsustainable global warming. The 2023-2029 plan is the last opportunity to be on course to reach 2030 Climate targets, so it is crucial that the plan reflects the scale of the challenges we are facing and includes the bold actions and timescales required. The City Development Plan must ensure that real action is taken to tackle the climate emergency.

Recommendations:

GCCN requests that the following are included under **Policy 2.2 Climate Action**:

8. The establishment of a Galway City Climate and Biodiversity Council, reflecting the National Climate Council (p.51).
9. Develop and enhance collaborative work with Galway County Council as a priority on tackling climate change in Galway (p.51).
10. Produce a clear and detailed plan for how Galway will reduce its emissions by 51% by 2030 with appropriate targets and timescales, reflecting the national target. This should include an assessment of the resource impact of industries (p.14).
11. Provide for measurement of emissions with an initial focus on developing baseline data for the City against which progress/regress can be assessed. (p.51)

GCCN requests that the following be included under **Policy 2.3 – Renewable Energy**:

12. Include measures to address energy poverty within the plan.
13. Collaborate with communities, with a particular focus on socio-economically marginalised communities, on developing decarbonising zones and low carbon communities.
14. Collaborate with the Galway Energy Cooperative and local communities to develop an Energy Master Plan for the city.
15. Develop untapped potential of solar energy including micro-generation schemes in housing estates, on community buildings, schools and public buildings.

Related to this GCCN also requests that in relation to **Policy 2.1**

16. Develop a comprehensive plan including targets and specific timescales for flood prevention and mitigation for the city, based on stakeholder participation, with development of Green Infrastructure and Nature Based Solutions (p.44).

3: Housing and Sustainable Neighbourhoods

The current provisions in the plan will not address the scale of the accommodation and homelessness crisis which is facing the city. The focus must be on public housing which guarantees security of tenure and the phasing out reliance on the private rental sector.

Recommendations:

GCCN requests that in relation to **Policy 3.1 Housing Strategy:**

17. The Council will increase the social housing targets to meet projected need given population growth projections including a revision of targets in the Housing Delivery Action Plan 2022-2026 to meet these needs (p.65). This should include options for independent living for older people and disabled people, allowing for a continuum of levels of support.
18. The Council will increase Social and affordable housing provision and delivery for the purposes of the prevention and elimination of homelessness to be a priority of the Galway City Development Plan 2023-2029.
19. The Council will provide for phasing out of long-term leasing for all tenants not just new entrants and put in place measures to provide appropriate accommodation which guarantees security of tenure (p.66).
20. The Council will provide for a minimum of 40% of the unit sizes and types included in new residential developments in Galway City to be one and two bedroom, suitable to meet the housing needs of single/one person households (p.65).

GCCN requests that in relation to **Policy 3.2 Traveller Accommodation:**

21. The Council will implement fully the Traveller Accommodation Plan (p.68).
22. Objectives for Traveller accommodation are integrated into all Local Area Plans and Strategic Development Zones Planning Schemes (p.68)

GCCN requests that in relation to **Policy 3.2 Sustainable Neighbourhood Context:**

23. The Council will ensure that facilities and services are part of the planning process and that no housing developments should be permitted without ensuring access to these facilities and services immediately on completion of the developments (p.75)

4: Sustainable Mobility and Transport

While GCCN welcomes the implementation of the Galway Transport Strategy, the vision for transport in the plan needs to go beyond the limitations of the GTS. The current plan relies too heavily on the GTS where no clear targets are set out for reduced private car modal share and increased modal share for walking, cycling and public transport is to be achieved.

Recommendations:

GCCN requests that the following be added to **Policy 4.1 General:**

24. The Council will recognise the 'user hierarchy that promotes and prioritises sustainable forms of transportation' set out in the Design Manual for Urban Roads and Streets and will respect this hierarchy in the planning, design and construction of all transport infrastructure.
25. The Council will ensure connectivity between city and commuter towns through high quality and frequent train links and Park and Rides including the establishment of a network of Park and Rides that feed into a high frequency light rail system.

26. The Council will ensure connectivity with pedestrian and cycling infrastructure and the bus network.
27. The Council will set out the development of sustainable transport infrastructure to service the predicted increased population.
28. The Council will develop a joint transport plan with the County Council particularly public transport and active travel links connecting new parts of the city to areas within the MASP.

GCCN requests that paragraph 6 under **Policy 4.2 Land Use and Transportation** be re-written as follows:

29. The Council will deliver the concept of the '15-minute city' by ensuring that land use policies facilitate residents to access their daily needs within a 15-minute walk or bike ride and thereby reduce the dependence on private car transport.

As a target for modal share is not included in the Galway Transport Strategy, GCCN requests that the following be added to **Policy 4.3 Public Transport**:

30. A Public Transport modal share of X% will be achieved by the end of the plan period. [City Council to set a specific measurable target of X%].

GCCN requests that the following be added to **Policy 4.4 Sustainable Mobility – Walk and Cycle**:

31. The Council will develop and implement a plan for an ambitious, safe and segregated pedestrian and cycling infrastructure.
32. The Council will focus on the needs of pedestrians and cyclists in the city centre through the provision of wider footpaths and shared streets.
33. The Council will prioritise the redesign of residential areas to prioritise pedestrian and cyclist safety through traffic calming measures, mobility lanes, safe walkways and zebra crossings.
34. The Council will ensure the neighbourhoods are designed so residents can access most services in a 15 mins journey on sustainable modes of transport with clear set targets as to how this is to be achieved.
35. A walking modal share of Y% will be achieved by the end of the plan period. [City Council to set a specific measurable target of Y%]
36. A cycling modal share of Z% will be achieved by the end of the plan period. [City Council to set a specific measurable target of Z%]
37. The plan should include key indicators on safety that should be established with timescales and targets, measured and monitored on an ongoing basis.

GCCN requests that the following be added under Policy **4.6 Road and Street Network and Accessibility**:

38. The Council will include Universal Design as a core component of Transport and Sustainable Mobility with clear actions illustrating how the principle of Universal Design will be applied in transport infrastructure as per Ireland's obligations to the UN Convention on the Rights of Persons with Disabilities and Barcelona declaration.
39. The Council will carry out regular audits, in partnership with disability organisations, in the public realm and civic spaces, including an audit of the accessibility of current transport infrastructure to include both the city centre and suburbs based on the principles of universal design.
40. The Council will develop an action plan using the results of these audits to implement relevant material alterations to current infrastructure.
41. The Council will review proposed active travel infrastructure designs to ensure routes are safe, direct, coherent, attractive and comfortable.
42. The Council will maximise permeability and ensure connectivity of active travel infrastructure in accordance with national policy by including contra flow cycle lanes on one-way streets as recommended in the Jacobs Report (2011) and included in a previous development plan ("Implement two-way access to cyclists on one-way streets where feasible" from Cycling section of City Development Plan 2011 – 2017, Page 35)

5: Natural Heritage, Recreation and Amenity

While the plan acknowledges the government's declaration of a Climate and Biodiversity Emergency, it lacks the required sense of urgency given the scale of the twin crises we are facing. It is imperative that clear targets and dates are set. 2023-2029 plan is the last opportunity to be on course to reach 2030 Climate targets, so it is crucial that the plan reflects the scale of the challenges we are facing and includes the bold actions and timescales required. Galway City, like any other city, must play its part in tackling the emergency.

The plan must include clear actions to deliver on local and national policies with dedicated resources for the implementation of these actions while learning from international best practice to incorporate appropriate measures into the plan.

Recommendations:

GCCN requests that the following is included in the **Policies in Chapter 5**:

43. The Council will take environmental and biodiversity issues into account in every action of the plan, so they are totally integrated across all sectors.

In relation to **Policies 5.1 Green Network and Diversity (p.122)** GCCN requests that

44. The Council will ensure that all proposed developments undergo a green audit.
45. The Council will require early stage pre planning consultation between local environmental groups and developers to ensure plans protect the environment and biodiversity.

46. The Council will ensure the embedding of biodiversity protection and enhancement into Local Area Plans, masterplans, and framework plans.

And in relation to **5.1 Green Network and Diversity (p.122)** and **5.3 Blue Waterways (p.132)**:

47. The Council will achieve the connection of green and blue space with wildlife corridors throughout the city.

48. The Council will provide for conservation and enhancement of habitat where possible. If this is not possible, substitute enhanced habitat should be made available. For example, green space lost due to developments must be recorded and substitute enhanced habitat made available.

49. The Council will develop a new Biodiversity Plan that looks beyond the current action plan which ends in 2024.

50. The Council will actively collaborate with the promoters to achieve National Park City designation for Galway City and reflect it with actions related to schools, transport, business, and other sectors. The Council will map and identify areas within the city and suburbs that would be suitable for rewilding.

GCCN further requests that social inclusion is embedded in this policy area through the following actions:

51. The Council will map areas of recreational use and reserved areas in collaboration with local communities, environmental groups and other stakeholders.

52. The Council will facilitate an education and awareness raising programme related to these measures including provision for demonstration sites which can be used to host these programmes to facilitate public engagement in the protection of the natural heritage.

53. The Council will implement measures to ensure accessibility and equal access to the Green and Blue Network for all communities in the city regardless of location or ability.

54. The Council will implement measures to connect the network with an accessible and sustainable public transport network.

55. The Council will implement targeted access measures to outdoor spaces that enhance emotional and mental health of disabled people.

56. The Council will ensure that additional spaces will be allocated in existing and new neighbourhoods for community gardens which are accessible through universal design principles.

6: Economy, Enterprise and Retail

The economy is a critical feature of the life of any city. For a small economy like Galway, economic development and enterprise have the power to transform and create employment opportunities for many. However, economic development must be appropriate to Galway and its identity and ensure that economic development and employment opportunities are inclusive of the diversity that is now such a feature of the city.

Recommendations:

GCCN welcomes the commitment in the plan to support ‘the provision of social enterprise incubation infrastructure required for growing and strengthening social enterprise’.

GCCN requests that the following are included in **Policy 6.5 Enterprise and Innovation**.

57. The Council will provide social enterprise incubation infrastructure required for growing and strengthening social enterprise based on the needs identified through engagement with social enterprises and communities.

58. The Council will provide spaces at affordable rents and rates levels for a range and variety of social enterprises.

59. The Council will audit vacant and derelict sites for the potential to be used as sites for social enterprise

GCCN requests that the following are included under **Policy 6.8 Tourism Sector:**

60. The Council will provide for the sustainable development of areas such as the Merlin Woods Castle and Terryland Forest Park and build land/green bridges to connect them to communities.

61. The Council will develop eco-tourism opportunities by developing the woodland areas around the city.

62. The Council will focus on local retail and facilitate spaces that highlight local crafts.

GCCN requests that the following are included under **Policy 6.12 Retail Hierarchy**

63. The Council will focus on ‘local’ in retail strategy.

64. The Council will develop and diversify the Night-Time Economy, ensuring that there is no increase in the number of outlets selling alcohol.

GCCN believes that Galway City Council needs to go beyond acknowledging the importance of the sector and requests that the following be included under **Policy 7.2 Creative City**

65. The Council will provide spaces for art and culture to be created and consumed.

GCCN requests that the following be included under **Policy 7.3 Inclusive City:**

66. The Council will promote quality employment opportunities and career advancement for persons with disabilities in GCC.

67. The Council will promote opportunities for self-employment, social enterprises, entrepreneurship, the development of cooperatives and starting one's own business through GCC Enterprise Unit.
68. The Council will promote the provision of appropriate accommodation for disabled people in the workplace.

7: Community, Culture and Education

Recommendations:

GCCN would like to highlight the importance of the development of a network of community hubs in the city that are interdisciplinary (community, education, arts etc.), free of charge, accessible and on public transport routes, prioritising the areas where there is least availability currently. We would like to see the following provisions integrated into the policies of **7.2 Creative City**, and **7.3 Inclusive City**.

69. Ensure that all community facilities are fully accessible and based on universal design principles, best practice and commitment to UNCRPD. Map current facilities against accessibility, including parks and playgrounds for children and young people with disabilities. Undertake remedial action where required.
70. Ensure that facilities are retained in community ownership and management with the support of community enterprises or local co-operatives. Access by the community needs to be retained as an absolute priority and 'innovative' models of delivery, ownership and management must not include developer-led or private ownership of community facilities.
71. Provision for alcohol free venues for arts, festivals and music events to create safe and enjoyable environments, accommodating young students, families and individuals from a variety of backgrounds, age-groups and cultures.
72. Provide community policing, neighbourhood watches and traffic calming devices within local communities.

In relation to **Policy 7.2 Creative City** GCCN asks that the plan integrates:

73. An Arts Facility Master Plan, with identified provision for all art forms, including arts spaces outside the city centre and major developments in the city.
74. Community proof all arts and cultural infrastructure so that accessibility for all sectors of the community, particularly those that have a disability and/or are socially excluded, marginalised and disadvantaged, is proactively encouraged.
75. Support the establishment of a school of music within the city.

Of relevance to **Policy 7.4 Bilingual City** GCCN would like this plan to expand support to:

76. Support a multi-lingual Galway, acknowledging the diversity that is an increasing and welcome feature of the city.

In relation to **Policy 7.3 Inclusive City** GCCN asks that there is:

77. Provision for resource centres where older people can access services, community supports and information in the centre and in the suburbs similar to the Westside Resource Centre and the Ballybane Resource Centre.
78. Provision for a network of information hubs around the city focusing on the needs of older people in relation to accessible information. The library network is one of the possibilities in relation to this, as is outreach from the Citizen's Information Centre.

8: Built Heritage, Placemaking & Urban Design

Recommendations:

GCCN requests that the following be included under **Policy 8.7 Urban Design and Placemaking:**

79. The Council will follow the guidance in the RIAI Town and Village Toolkit
80. The Council will clearly illustrate how the principle of Universal Design will be applied in the planning process.
81. The Council will carry out regular audits, in partnership with disability organisations, in the public realm and civic spaces to include both the city centre and suburbs based on the principles of universal design.
82. The Council will employ a Galway City Conservation Office.
83. The Council will identify models of good planning and design internationally and strive to incorporate such practices in the development and implementation of the plan including a shift away from developer led planning and design.

9: Environment and Infrastructure

Recommendations:

Under Policy 9.3 Water Services GCCN requests that:

84. Galway City Council agree a specific timeline with Irish Water for the "provision of a sustainable and effective wastewater drainage collection and treatment system capable of meeting the existing and future needs of domestic, commercial and industrial users in the city and the MASP area" and include that specific timeline in Item 5.

GCCN further requests that the following be added to **Policy 9.6 Air Quality and Noise:**

85. The Council will provide 3 additional air quality monitoring stations across the city.
86. The Council will develop a new Noise Action Plan which also records noise from industry.
87. The Council will implement measures to reduce water, air and noise pollution levels.

10: Compact Growth and Regeneration

Recommendation:

GCCN requests that Galway City Council commit to:

88. Commits to preparing Local Area Plans for all significant regeneration and opportunity sites in the city rather than requiring developers to prepare masterplans, frameworks plans or spatial frameworks. This will enable meaningful participation by local communities and key stakeholders.

Appendix 1 – Implementation and Monitoring

Recommendations:

89. The plan must include specific targets, indicators and timescales and put in place associated participative monitoring structures and processes to guarantee implementation.
90. Furthermore, GCCN requests that, as the Public Participation Network for Galway City, GCCN be named as a key stakeholder as provided for in the Local Government Reform Act 2014.

