



National Planning Framework 2040  
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9 NOVEMBER 2018

**RE: DRAFT NATIONAL PLANNING FRAMEWORK 2040 RESPONSE**

To Whom it Concerns:

Following our extensive review and consideration of the Ireland 2040 - Our plan – Draft National Planning Framework (“NPF2040”), Galway Chamber is submitting this response. While the objectives of the National Planning Framework are most welcome and badly needed, we believe that many of the Galway specific initiatives contained in the NPF2040 are already in place, there is nothing new for Galway and there is no creation or sense of a step-change for the future development of both Galway City and County. It is our view that the NPF2040, as currently drafted, does not meet the ambition and aspirations of the people of Galway and the West of Ireland.

Our collected vision is to make Galway *the* model in Ireland, fuelled by the energy, drive, culture and diversity of the people of Galway, for inclusive innovation and economic growth. Our goals are to:

- Promote and grow quality jobs for all;
- Cultivate dynamic, resilient communities across the county of Galway; and
- Improve quality of life for all.

When considering the issues raised in this letter, it is extremely important to note that the concerns contained within this response are reflective of the wider community in both the City and County of Galway.

On Friday, October 20<sup>th</sup>, Galway Chamber organised a meeting and workshop to discuss the Draft National Planning Framework, which was hosted by the Whittaker Institute in NUI Galway. This meeting was attended by individuals from varying sectors of the business society and academia including The Western Development Commission, IDA, NUI Galway, Galway Chamber of Commerce, Galway Port, Shannon Airport, local architects, etc. This meeting noted significant shortcomings within the Draft National Planning Framework in relation to Galway and the West of Ireland.

The most significant outcome from this meeting was in relation to Connectivity – this is the key issue for the West of Ireland because without it, no other initiative will have any significant impact for the future economic growth of the region. It is also acknowledged that post-Brexit, the West of Ireland will be the remotest part of Europe and this needs to be considered and provided for within the completion of the NPF. In relation to Connectivity for Galway and the West of Ireland, this is inclusive of broadband, road, rail, port and airports.

The meeting also concluded that Galway has been totally overlooked in relation to strategic initiatives to propel the economy in the West of Ireland and called for the inclusion of (i) a Galway Development Authority, with responsibility for driving innovation and growth, and (ii) the development of a Master Plan for Galway City and its environs within the revised National Planning framework.

From reading and digesting the content of the Draft Ireland 2040 – Our Plan we have unfortunately reached the conclusion that Galway has not been treated in equal measure to the other identified cities in the Plan, particularly Dublin, Limerick and Cork and this failure in equitable treatment by our Government will result in the Galway of the future being a 2<sup>nd</sup> tier city lagging behind our colleagues in the East and South. This will result in an imbalanced Ireland and will further extenuate the movement of people out of both local communities and out of Ireland.

We take umbrage to the reference on page 58 to Galway being located at the point on the Atlantic Economic Corridor from where the influence of Ireland's southern Atlantic cities (Cork and Limerick) extend northwards. This is a mis-informed and inaccurate statement. There has been an extremely active Atlantic Economic Corridor ("AEC") in operation for the last number of years stretching from Shannon to Sligo, with Galway being at the centre, not at the northern fringe, and continuing to be one of the driving forces behind the AEC. The future growth of Galway City is of critical strategic importance to the future success of the West and North West.

To suggest that this well-established AEC is influenced from the south is incongruous to all those who have been actively involved in the creation and development of the AEC in the West of Ireland. As you are probably aware, this AEC has been involved in the co-development of policy with the Department of Enterprise.

Now is the time to address the future economic growth and development for **ALL** parts of Ireland. If no action is taken to address the current level of imbalance and inequality of treatment for Galway, then the future people and Governments of Ireland will have to address and deal with the inadequate development of the NPF process which has taken place over these last 12 months, a legacy which no one wants to be part of.

We are totally opposed to the lack of strategic initiatives for Galway based on the high-level objectives of the 2040 Plan as set out on page 27 of the draft document, some of which are as follows:

1. A fair society with strong social cohesion and converging living standards throughout the country, in which all individuals, businesses, communities and regions have the opportunity to prosper;
2. A creative, innovative and culturally attuned society, whose people, businesses and communities are equipped to further our national economic output and artistic endeavour;
3. Significant improvement in local and international connectivity that underpins the competitiveness and quality of life of our people, businesses, communities and regions; and
4. A collaborative society in which our cities, towns, counties and regions engage in new partnerships that benefit people, communities and businesses, both locally and internationally.

In the context of these all-Ireland objectives, based on the Ireland 2040 NPF draft document, there is no evidence of Galway being an integral part of the realisation and delivery of the Ireland 2040 Vision.

To support our views, we attach 3 appendices to this letter, which are as follows:

- **Appendix 1: Comparison of the Growth Enablers for top 4 cities, as included in the Draft 2040 Plan**

- Appendix 2: **Comparison of the Galway Chamber submission with the draft Ireland 2040 plan**
- Appendix 3: **Comparison of the Hierarchy of Settlements and Related Infrastructure as included in the draft Ireland 2040 plan with the current and future position in Galway**

As you will see from the appendices, it is regretful reading for Galway and the West of Ireland. Whilst there are similar strategies for Housing and Utilities contained with the 2040 Plan for all cities, there are only minor strategic and transport initiatives for Galway compared with significant initiatives for the other cities. This begs the following questions which we would like answered:

- Why is there no innovation park planned for Galway as there is for Cork?
- Why is there no reference to the Port in Galway while there are Port references for Dublin, Cork and Limerick?
- Why is there no ambition for Galway as there is for Limerick in relation to the extension of the city centre?
- Why is an ambitious vision required for Cork, but none for Galway?
- Why is there no plan for Galway to improve traffic flow around the city?
- Why has the issue of regional connectivity, both road and rail, been ignored for Galway, in comparison to specific/detailed references for both Cork and Limerick?
- Why is there no mention of the establishment of a Galway Development authority, which would have responsibility for the development of a master plan for the Central Business District?
- Why is there no mention of any strategic supports for the tourism industry, which is a key element of the economy in the west?

Included within the Draft 2040 Plan on page 77, there is a diagram entitled '*Hierarchy of Settlements and Related Infrastructure*' which sets out the infrastructure which is expected to be in place for towns of various sizes and cities. Having read the Draft 2040 Plan, we have not been able to find any reference to many of the significant elements of infrastructure which have been identified as necessary for a city the size of Galway. We now request that the final version of the NPF2040 includes plans to address the following significant elements of infrastructure which are currently missing from the plan in respect of Galway:

- Acute hospital
- Conference and Concert Arena
- Power Generation
- High Court, Prison, Forensic Science
- Tourism Signature Projects
- Strategic Development Zones
- Ports & Airports
- Key Transport Nodes

Based on the above, the Draft 2040 Plan has totally missed the opportunity to provide Galway with the necessary infrastructure to ensure its continued growth and economic sustainability into the future. The devastating consequence of these initiatives not being included in the Plan is that there will be no provision for any significant infrastructure projects for Galway in the New 10-year National Investment Plan. Therefore, no new Government capital spend will be allocated to Galway until 2030 at the earliest. We cannot afford to wait for this next phase of spending.

**Call for Action**



While we welcome the inclusion of the specific initiatives to complete the Galway City Ring Road (a most vital piece of infrastructure for Galway) and the Galway East main drainage waste water treatment plant, we believe that there is now an opportunity to reshape the draft 2040 NPF to have a truly National and inclusive plan for a successful Island of Ireland by 2040. To achieve this, the lack of strategic infrastructure initiatives for Galway must be redressed before the final 2040 Plan is produced/published.

We accept that it will not be possible to include all potential infrastructure projects in the Final Plan for Galway, therefore, we ask that, at a minimum, the following 4 key elements of infrastructure be provided for:

1. Connectivity – this is the key issue for the West of Ireland and is inclusive of broadband, road, rail, port and airports and without these components, no other initiative will have any significant impact for the future economic growth of the region. As previously stated, post-Brexit, the West of Ireland will be the remotest part of Europe. In the short to medium term, the expansion of the Port of Galway will allow for the re-urbanisation of the city's quays, as set out in the National Ports Policy 2013. The Port relocation to a deep-water facility is intrinsic to the development of tourism and commerce and must be included in the NPF.
2. Spatial Planning: Establishment of a Galway Development Authority, with responsibility for driving innovation and growth, and the development of a Master Plan for Galway City and its environs.
3. Health and Well Being: A new acute hospital to service Galway and the region, incorporating a medical campus to support greater integration between Higher Education Institutions, medical devices companies, technology providers, pharmaceutical companies and the health service.
4. Innovation and Growth: Establishment of a city centre innovation district linking Higher Education Institutions, marine, technology, creative industries and medtech accelerators, additionally linked to innovation hubs within the county and region.

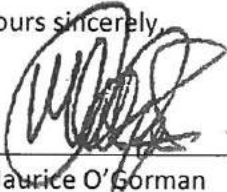
To aid you in your consideration of the key elements for Galway for inclusion in the 2040 Plan, we attach a copy of the Galway Chamber 'Galway 2040 Towards a Shared Future' document which was published and launched in Galway in April 2017. The purpose of this document is to challenge the imagination, fuel discussion and inspire Galway's citizens to support and take ownership of the future development of Galway. We hope that it also inspires you, the decision makers.

We also include at Appendix 4 a list of other key strategic initiatives which the meeting on October 20<sup>th</sup> concluded should be considered for inclusion within the final NPF.

We would welcome an opportunity to discuss with you the key points above, which are supported by the wider business and community groups within Galway City and County.

We look forward to the receipt of a positive response and the inclusion of the key strategic infrastructure requests for Galway in the revised 2040 Plan.

Yours sincerely,



Maurice O'Gorman  
President  
Galway Chamber

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**Appendix 1 – Ireland 2040 – Our plan**  
**Comparison of Growth Enablers for top 4 cities**

<b>Growth Enablers</b>	<b>Dublin</b>	<b>Cork</b>	<b>Limerick</b>	<b>Galway</b>
<i>Housing and utilities</i>				
Progressing the sustainable development of new greenfield areas are housing	X	X	X	X
Ensure water supply and waste-water needs are met to enhance water supply and increase capacity	X	X	X	X
Improving sustainability in terms of energy, waste and water	X	X	X	X
Identification of large scale regeneration areas for provision of new housing and employment	X	X		X
Identifying infill and regeneration opportunities to intensify housing development in inner city areas		X	X	X
Determining a number of accessible locations for significant people-intensive employment to complement the city centre and docklands area	X			
Enabling enhanced opportunities for existing communities as development and diversification occurs	X	X	X	
Public realm and urban amenity projects	X			X
Measures to enhance and better link the existing network of green spaces	X			
Delivery of the Galway east main drainage waste water treatment plant				X
<i>Transport</i>				
Development of a bus-based/public transport system including integration with other networks	X	X	X	X
Relocating less intensive uses outside the M50 ring	X			
Delivering the key rail projects set out in the Transport Strategy	X			
Improved traffic flow around the city		X		
Delivery of the metropolitan cycle network	X		X	X
Improved regional connectivity through improved average journey times by road		X	X	
Improved rail journey times to Dublin		X		
Delivery of the Galway City Ring Road				X
<i>Strategic</i>				
Improving access to Dublin/Shannon airport	X		X	
Facilitate the growth of Dublin Port	X			
Development of a new science and innovation park to the west of Cork City		X		
The continued expansion of and integration with the City's third level institutions		X	X	X
Implementation of the Limerick 2030 economic strategy to create modern, city centre office accommodation and a series of transformational city centre public realm projects			X	
Further development of Limerick 2030 to encourage significant inner urban residential regeneration			X	
Extend the ambition of Limerick 2030 to include extension of the City Centre towards Limerick Docks			X	
Determining the sustainable future development of the Galway Airport site				X
M8/N25/N40 upgrade and improved Ringaskiddy Port access		X		
Enhanced road connectivity to Shannon-Foynes Port			X	

## Appendix 2

### Ireland 2040 – Our plan

#### Comparison of the Galway Chamber submission with the draft Ireland 2040 plan

	Our ask	Was it Delivered?
1	Establishment of the Galway Development authority, with responsibility for the development of a master plan for the Central Business District	No
2	Creation of master plan for Galway, incorporating a mass transit plan extending out to the Ardaun area, incorporating the new industrial and enterprise zones	No
3	Development of a high speed rail network between Galway and Dublin and increased public transport within Galway, including bus and rail	No
4	Higher buildings and higher density in the Central Business District	General reference within the Plan to increasing building height and density for all urban areas
5	The speedy completion of the Galway City Outer Bypass ("GCOB"); an essential transport aisle to allow connectivity for vehicles destined for Connemara, the wider west Galway region and south Mayo	Reference was made to the delivery of the Galway City Ring Road, however no timeline has been established
6	The extension of the Port of Galway to accommodate cruise ships and freight	No
7	A new acute hospital to service Galway and the region, incorporating a medical campus to support greater integration between Higher Education Institutions, medical devices companies, technology providers, pharmaceutical companies and the health service	No
8	The establishment of a centre for marine research and finance	No
9	Co-location of national bodies, including ISIF and SBCI	No
10	Increased emphasis on innovation by providing State agency support for marine, technology, creative industries and medtech accelerators, linked to innovation hubs within the county and region. Greater emphasis and support for the provision of enterprise spaces for start-ups and growth companies	No

### Appendix 3

#### Ireland 2040 – Our plan

#### Comparison of the Hierarchy of Settlements and Related Infrastructure as included in the draft Ireland 2040 plan with the current and future position in Galway

Area	Top level of related infrastructure	Do we have it	Is it in the Ireland 2040 plan?
1 Skills	University	Yes	Reference to the continued expansion of and integration with the City's third level institutions
2 Health	Acute Hospital, A&E, Maternity	Yes, but not at levels needed to cater for demand	No reference to future expansion, catering for growth, etc.
3 Social	Museum, Galleries, Conference/Convention arena	No. Acknowledged that Galway is lacking in this area	No reference
4 Environment	Power generation	No	No reference
5 Commercial	Department stores, Specialist shops, Arts & Cultural facilities	Have a certain element of this. Limited on the Arts & Cultural side.	No reference
6 Justice	Garda HQ, High Court, Prison, Forensic Science	In the process of completing a new Garda HQ. Galway does not have a high court, prison or forensic science capability	No reference
7 Productive	Tourism signature projects, Science centre, Major industrial parks, Strategic development zones	Galway has large industrial parks. It is lacking in the tourism and strategic development zones	No reference
8 Networks	Ports & airports, Key transport nodes, Energy generation, Interconnector	No airport and lacking on the transport side	No reference and particularly silent on the future of Galway port



#### Appendix 4

##### Ireland 2040 – Our plan

List of other key strategic initiatives which the meeting on October 20<sup>th</sup> concluded should be considered for inclusion within the final NPF

No.	Strategic Initiative
1	The establishment of a centre focussing on the Blue and Green economies incorporating research, commercialisation and finance
2	All national bodies, such as the National Transport Authority must have national mandates, not just Dublin focussed. Consideration of co-location of national bodies, including ISIF and SBCI.
3	Statement on airports. Airports in the West of Ireland must be recognised under the airport strategy
4	Investment in Galway's waterways; development of a tourism signature project incorporating the waterways and marine.
5	To reduce commuting by car, suburban in fills within Parkmore and other industrial parks. The concept of industrial parks isolated from residential is out dated
6	Electrification of the Dublin Galway train line. Development of a high speed rail network between Galway and Dublin and increased public transport within Galway, including bus and rail
7	Development of a new High Court in close proximity to the new Galway Regional and Divisional Garda Headquarters