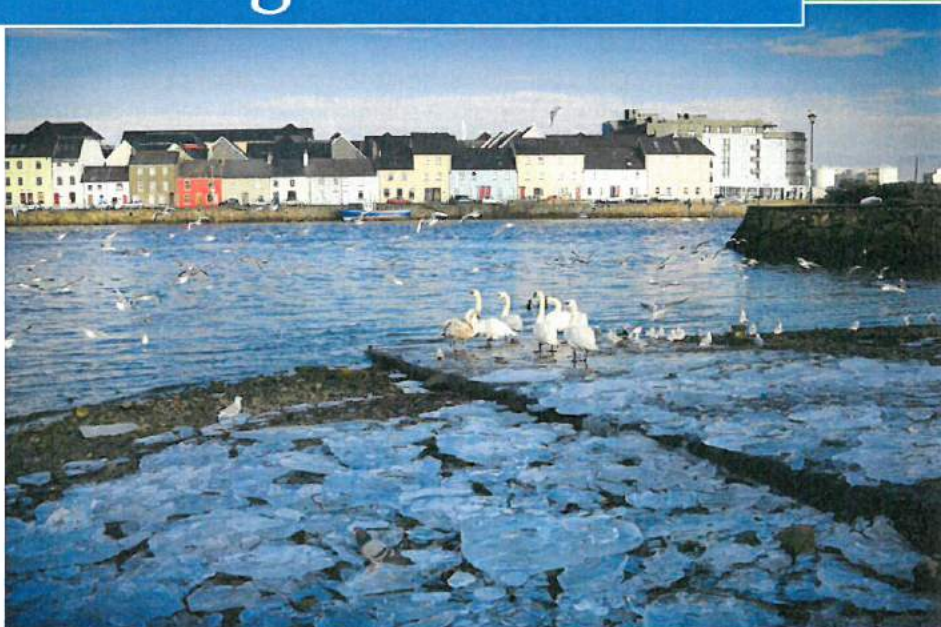


# Ireland 2040 Our Plan National Planning Framework



Galway City Council  
Submission

2/11/2017



## **Re: Ireland 2040 Our Plan National Planning Framework Galway City Council Submission**

Galway City Council welcomes the publication of the Draft National Planning Framework (NPF) and the opportunity to make a submission at this stage in the process.

This submission embodies the views of Galway City Council. It also includes reference to the specific issues highlighted at a dedicated NPF workshop attended by the Elected Members.

The Council welcomes the acknowledgment that there is a need for a long term, strategic, spatial strategy that will structure policy and investment decisions in a manner that will address the unsustainable patterns of current development trends. The vision and approach as identified in the Preface, Chapters 1 and 2 are considered appropriate in general and will hopefully gain cross governmental policy support and long term investment and political commitment.

Specifically in relation to urban areas as provided for in Chapter 3 there is welcome acknowledgement of the important role of the regional cities, towns and villages. The vision and growth direction for regional cities which includes Galway is a welcome spatial model coupled with the knowledge that such growth needs to happen in a compact manner, supported by good place making, regeneration and a radical shift to sustainable transport modes.

It is felt however that there is a deficit in reference to the key investment requirements to enable Galway realise its intended role as 'a driver of national growth and as a key regional city'. It is acknowledged that the regional assemblies will have a role identifying priority enablers for growth in the RSES. However it is felt that these should be more confidently expressed in the NPF to affirm the commitment to grow the regional cities to the scale targeted, that is at a rate twice that of current growth and to materialise the "collective offer" of these cities particularly in relation to creating some counter balance to the dominance of Dublin.



Specifically it is requested that modifications are made to the following as identified in blue

### Key future growth enablers for Galway

- 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.
- Identifying infill and regeneration opportunities to intensify housing and employment development throughout inner suburban areas.
- Progressing the sustainable development of new greenfield areas for housing and the development of supporting public transport and infrastructure, such as at Ardaun.
- Implementing the *Galway Transport Strategy (2016)* which includes measures to enhance public transport and sustainable transportation.<sup>1</sup>
- Improving access and sustainable transport links to, and integration with, the existing employment areas to the east of the City at Parkmore, Ballybrit, Mervue and Ragoon /Knocknacarra<sup>2</sup>
- The continued expansion of all city education facilities, in particular third level institutions and their integration with the city and region including the facilitation of the objective of the Connacht-Ulster Alliance (CUA) to establish a Technological University (TU) for the West and North West of Ireland.
- Determining the sustainable future development of the Galway Airport site for employment and/or residential use together with supporting facilities and infrastructure.
- Provision of a Citywide public transport network in accordance with the measures included in the *Galway Transportation Strategy* to deliver enhanced accessibility between existing and proposed residential areas and the City Centre, third level institutions and the existing employment areas to the east and future employment areas in the west of the city.
- Public realm and urban amenity projects in conjunction with measures to be delivered under the *Galway Public Realm Strategy*, 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.
- Development of a strategic cycleway network and associated infrastructure as identified in the *Galway Transport Strategy* with a number of high capacity flagship routes and delivery of the National Cycleway and Greenway network including the connecting section within the city.
- Delivery of the Galway City Ring Road.

<sup>1</sup> The GTS should be specifically reference in view of the NPF's commitment to put it /others NTA transport strategies on statutory footing.

<sup>2</sup> This extends the reference to all large industrial zoned lands not just IDA owned lands

- Delivery of the Galway East Main Drainage Waste Water Treatment Plant and other critical infrastructure measures identified in the Galway Main Drainage project.
- 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.
- Improving sustainability in terms of energy, waste and water, to include district heating and water conservation.
- Realisation of proposals for the expansion of Galway Port in alignment with regional, metropolitan and local plans.
- Strengthening of the Medical Technologies and ICT clustering and supporting diversification and expansion into the emerging 'Blue Economy' and Food economy.
- Delivery of key cultural and arts infrastructure in the context of the Cultural Strategy and to facilitate successful delivery of Galway European Capital of Culture 2020 and its legacy.
- Delivery of key community and social facilities to support existing and future targeted population under the NPF.
- Delivery of measures to address housing supply and demand set out in *Rebuilding Ireland* including those pertinent to Galway.
- Delivery of an enhanced regional health care service, developed to a modern standard to support existing and future population within the region including for a new acute hospital, located in Galway City to service the West and North –West.
- Continued development of broadband and hyper-connectivity measures including subsea links to continental Europe.
- Delivery of future projects emanating from the *Climate Change Adaptation Plan*, national and local.
- Timely delivery of the Catchment Flood Risk Assessment and Management Programme and investment in identified manage flood risks measures, designed appropriately for sensitive city locations.
- Development of the Murrough LAP area for recreation and amenity and appropriate mixed uses.
- Implementation of the objectives of the *Recreation and Amenity Needs Study* including investment in parks and open space acquisition and continued provision of recreation facilities.



- Ensuring a maintained and improved rail network, with frequent intercity connectivity and commuter rail services and including the facilitation of the double tracking of the Galway to Athenry line and in the longer term to Athlone – Portarlinton section of the line.
- Improvements and support for key city amenity infrastructure including the *Sailín to Silverstrand Coastal Protection Scheme* and Salthill Promenade upgrades.
- Delivery of environmental protection measures such as the River Basins Management Plans and measures to support improved bathing water quality.

### **National Smart Growth initiative**

Galway welcomes the proposal to include for a National Smart Growth initiative as part of the ten year capital investment plan. However it is disappointing to note that the intention is that this would be put on a competitive bid basis.

This approach would appear contradictory to the intention to re-balance the urban hierarchy in the country and to enable the Atlantic Economic Corridor to evolve with a degree of consensual coordination. A competitive bid would reinforce a more introverted approach to regional city corridor development. It is understandable that any funding should be targeted to deliver the best and most sustainable results but each applicant city/town will not have the same baseline situation or challenges. A competitive bid may not nurture the supporting relationships needed between the 4 city corridor to function as a spatially focused entity.

In addition, competitive bids as was experienced in the Gateway innovation Fund process, is a considerable draw on financial and other resources in currently resource challenged local authorities particularly where success even with merit is not inevitable.

### **Targeted Population**

Galway City welcomes the targeted population of up to +45,000. This would give an estimated population for the city of 125,000 by 2040. It is not clear how this will be achieved. This is noted where general enablers are referenced with an ambition to correlate with the national investment plan but without any specifics. These are not accompanied by a set of key specific actions / national developments as is provided for in the Scottish NPF- Framework 3 which is referenced as an influencing document. It is acknowledged that there is a reference to the ongoing review and monitoring with the Capital Investment Plan to ensure a consistent approach but no clarity as to how the targeted population which is described for all the cities as a doubling that of the current rate of growth will be achieved without a structured influencing strategy.

The regional plans will have a role undoubtedly but there is a vacuum as to what constitutes priority at national level and affirms a focused strategy on regional cities and correspondently is linked to the national investment plan. In this regard we would see specific projects e.g. delivery of the entirety of the Galway Transport Strategy as one such project, not just the N6 GCRR element. Correspondingly there would be priority projects itemised for other locations also.

Another element associated with achieving the targeted population and controlling further sprawl is that in relation to the rural housing policy. The NPF is forceful on the approach to curtailment of sprawl around cities and large towns and strong on the commitments to consolidation and infill in urban areas which is welcome. However the balancing policy on rural housing is unclear. This is



particularly relevant to areas outside of Galway city where there is a significant concentration of one-off rural housing reflecting prevailing policy approach. The occupants of these dwellings currently constitute much of the commuter workforce in Galway, 90% of which are car commuters.

This is a significant issue when it is noted that the city workforce is supported by a commuter figure greater than double the OECD definition of typical commuter catchment at 15% (reference in the NPF). This raises the question as to how an 'area under urban influence' is defined. It is also unclear, notwithstanding the ministerial circular in May 2017 and 2005 Guidelines on sustainable rural housing what criteria local authorities will use to determine what is a 'demonstrable economic need'. Without a clear direction and an enforceable policy on rural housing and areas under urban influence the approach to concentrate housing in urban areas may be undermined.

### **Governance - Metropolitan Area Spatial Plan (MASP)**

The need to have a high level plan to co-ordinate strategic issues that impact a city and environs is considered a good concept in light of the close relationship between cities and their environs. However the NPF does not give clarity on what legislative support, if any is intended. It doesn't elaborate on the administration structure/resourcing nor the political input from the relevant authorities. It is difficult to see how this can be managed with success at a regional level on all these platforms. The NPF suggests that the first of such metropolitan area plans will be advanced in parallel with the RSES's which would according to the indicated schedule be by end of 2019. Another aspect of this will be the challenge to establish what the metropolitan boundaries are, noting that there is no mapping to support the definition of the areas concerned for any of the five cities.

### **Housing**

There is reference to developing a statutory standard methodology and data sources for preparation of core strategies and RESE's. It is also noted that this is to be complemented by a 3 tiered zoned land approach. It would be critical that this was supported by a comprehensive national housing data and research section in advance of requiring authorities to apply a new methodology. The Housing Agency is the current body dealing with relevant housing issues. It would be assumed that they/other would give direction on the more nuanced element of housing over and above normal quantitative considerations. That is dealing with household cost, sizes, tenure, and affordability, including potential new models of housing, construction and prevailing financial factors. Aspects relating to estimation of the requirements for special needs housing and Traveller accommodation has a national dimension also.

These are more volatile factors that may be needed to supplement the more projectable elements that are normally factored into standard methodologies associated with 6 year city development plan cycles. They could be used to correlate assumptions relating to likely types of demand (urban /suburban, unit sizes, unit type demand, and likely tenure types). It would be difficult for planning authorities, even with the benefit of standardised core strategy methodologies to factor in these contributors to the assessment of detailed housing demand elements.

In this regard it is also queried how in advance of such national data a factor of 50% of future demand is allocated to infill/regeneration sites for Galway. This translates to accommodation of up to roughly 10,000 units or more considering the reduction in household sizes, targeted population and new household formations. It is not disputed that infill/brownfield residential is desirable, it is more a question of the how the decision of such an ambitious allocation is being made in advance of actual evidence based data noting that city centre housing (apartments normally) may not appeal /suit all /be financially feasible. This is also noting that if rural housing is not subject to serious

control, the economics of high value city centre housing with high construction costs pitched against lower cost rural housing may prove difficult without more strict policy controls than what is prevailing.

### **Performance based standards**

It is agreed that certain flexibility in development management standards should be inbuilt into the assessment of developments in city centres and particular for brownfield sites. The Galway City Plan 17-23 currently makes a number of allowances for this on the basis of qualitative and performance criteria for the city centre – this relates to flexibility on prevailing density, height and car parking demand standards. It is considered however that the nature of the relevant standards should be at the discretion of the local authorities and that no generic application of height /density standards/car parking should be applied through ministerial guidelines as appears to be currently under discussion for Dublin at least. The tolerance for both is better assessed at local level and a general standard particularly relative to height may not be suitable for the sensitivities of some locations.

### **Transition to a low Carbon Economy**

The NPF notes the legally binding targets Ireland is subject to in the commitment for transition to a low carbon economy by 2050. This requires an 80% reduction in CO2 emissions from 1990 levels. It is referenced that this change would come about from a number of changes including a shift to renewable energies, improved technologies, and sustainable transport measures such as those embodied in the GTS. It establishes this issue as a key element for Ireland 2040. However and in view of significant contribution of agricultural activities (contributed to 30% of emissions in recent years) these should also be referenced and be a consideration of the NPF. It will undoubtedly be a challenge both spatially and economically if emission targets for 2050 are to be met to consider appropriate replacement land uses and economies for such areas which is very relevant to our regional area – the North West Region.

### **Compulsorily Purchase Powers (CPO)**

The prioritisation of development land as referenced suggests more active use of CPO powers to release land bottlenecks in an effort to actively manage development land. Changes to CPO and arbitration legislation and procedures, notwithstanding constitutional rights to property, would be welcome. Currently the procedures are used as a last resort rather than as a pro active measure owing to the cumbersome nature, time consumption and the strong likelihood of arbitration following a successful CPO. Amendments in legislation could also be supported by the a facilitation of bespoke negotiation services, possibly under the umbrella of the proposed state led strategic land agency.

