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Galway City Community Network
The Public Participation Network in Galway City

Submission to
Ireland 2040
The National Planning Framework

Introduction

Established in 2014, Galway City Community Network is the Public Participation Network in Galway City. 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.

The decision to make a submission to the Ireland 2040 is led by the Environmental Linkage Group¹ and is informed by the experience and expertise of the other sectors that encompass concerns to ensure social inclusion and equality; quality housing and accommodation; arts and culture, particularly the right to participate, create and express culture; planning and transport.

GCCN welcomes the prospect of a new planning framework for Ireland. We particularly welcome the holistic view that is being pursued by Ireland 2040. We believe that Ireland should be building and supporting sustainable communities where there is an emphasis on the quality of life for people of all ages, abilities and ethnicities living in those communities.

Submission to Ireland 2040

Value-Based

GCCN believes that Ireland 2040 should be underpinned by a set of values that should be enabled by the NPF. These are:

Established in 2014 and formally launched in 2015, Galway City Community Network (GCCN) is the Public Participation Network in Galway City. The GCCN work is motivated and guided by values of:

- Sustainability and a concern for preserving and protecting the natural environment.
- Equality and a concern for non-discrimination, valuing and respecting diversity, empowering people, and securing access to social and economic resources.
- Culture and a concern for empowering, and fostering the diversity of cultures in the city and enabling people to express their creativity.

¹ Representing many of the groups and organisations concerned with the environment, climate change/climate justice, sustainability, heritage in Galway City.

- Community and a concern for the physical space, identity, and/or interests shared by a group, where people enjoy wellbeing and harmony, organise collectively, and engage in shared creativity.
- Empowerment and a concern for representation and participation in decision-making and democracy in the city.
- Inclusion and a concern for fostering and ensuring a sense of belonging to and opportunities to engage with one's community and the city.

Vision

GCCN suggests the following vision:

Ireland, a creative and inclusive country that respects and values its people and communities, their wellbeing and quality of life, that will develop a vibrant, sustainable, economy and environment and participative and transparent governance

Participation, Consultation & the Right to Have a Say

Ireland 2040 should provide for measures that proved for participation, consultation and the right to have a say on all developments that go beyond the current tokenistic approaches. Particular attention must be paid to communities that are marginalised such a Travellers, women, lone parents, asylum seekers, migrants, the LGBTQI community, etc.

Social Inclusion, Equality & Human Rights

The National Planning Framework must be underpinned by social services that are concerned with social inclusion and equality. All local state agencies and public bodies should be required to implement the Public Sector Positive Duty across all services and provide training on the Positive Duty, equality and diversity for staff in line with their obligations under the Irish Human Rights and Equality Commission Act 2014¹. Ireland 2040 needs to plan for the recognition and implementation of International Human Rights Treaties such as CERD², CEDAW³, UNCRC⁴ and CRPD⁵.

Ireland should ensure that the Traveller and Roma communities are provided with culturally appropriate accommodation and services. Planning authorities should have to have specific regard to the provision of such accommodation and services and there should be sanctions in place for local authorities that fail to provide these.

Ireland 2040 should plan for the ratification of the United Nations Convention on the Rights of People with Disabilities and ensure that the services and resources are in place to ensure that people with disabilities are fully enabled to live their lives to their potential. It should ensure that the rights of people with intellectual disability to make decisions in accordance with the Assisted Decision-Making (Capacity) Act 2015¹⁹ are recognised and supported.

The system of direct provision^d for asylum seekers and enforced deportations be ended.

Ireland should set a target of ending violence against women and children, including sexual violence. Ireland 2040 should provide for the full resources for frontline services for women experiencing violence are provided.

Communities

GCCN believes that health and wellbeing should be at the core of all planning. Planning should start with a concern for sustainable communities and subsequent decisions should be based on how to ensure sustainable communities that have access to the social, economic and cultural resources that ensure their health and wellbeing. Facilities and supports should be available in all communities to ensure that physical and mental health is supported and resourced. Particular attention must be paid to the structural inequalities of health and initiatives to mitigate these structural inequalities should be developed under the framework of the internationally recognised social determinates of health. Mental health be given parity with physical health involving parity of support, awareness and resourcing.

Ireland 2040 should plan for children and young people and ensure that there are facilities in every community to accommodate their needs, including playgrounds, drop-in centres, youth cafes and recreational facilities for older children, teenagers and young adults.

Ireland 2040 should ensure that the built and social environment, particularly in Galway is developed to enable people of all ages, but particularly the older members of our community, to be engaged and to feel and be safe both at home and out and about. It should ensure that older people who own their own houses are given an opportunity to take up sheltered social housing or voluntary downsizing in exchange or part exchange for their property which could then be used for other forms of social housing. Ireland 2040 should ensure that services are put in place to ensure that, as far as possible, older people can get to where they need to go, when they need to do so. It should provide for supports so that all members of the community are facilitated to live in their own homes and communities for as long as possible and participation for all members of the community in social, economic, cultural and public life are promoted.

Ireland 2040 should ensure that there are accessible community facilities that are funded and resourced in every community.

Ireland 2040 should provide for supported accommodation to allow people to live inter-dependently in a safe and secure environment.

The Built Environment

Participatory methods in architecture and planning processes that meaningfully engage communities should be established particularly in relation to infrastructure that facilitates cultural diversity. The built environment should have a focus on community facilities including for example, fully accessible gyms and community pools;

Environment & Climate Change

GCCN calls on Ireland 2040 to seek a radical transformation of Ireland's energy system to meet climate policy objectives. Our vision of a low carbon energy system means that greenhouse gas (GHG) emissions from the energy sector should be reduced by between 80% and 95%, compared to 1990 levels, by 2050, and will fall to zero or below by 2100⁴⁴. Ireland 2040 must ensure that the circular economy⁴⁵ is

embedded in all climate strategies and policies. It must ensure a Reduce, Reuse, Recycle & Compost waste management system that will lead to a Zero Waste programme for Galway city and the country is developed and implemented. It must emphasise the important and support the KEEP IT LOCAL localisation movement, including in relation to food security with ethical sourcing principles including in relation to procurement processes. It must also ensure:

- A strategy to make Galway a fossil fuel free city by 2025 is developed and implemented;
- Initiatives for local, sustainable generation of electricity are supported;
- Local Authority housing is developed as passive housing, using district heating and the highest standards of insulation;
- Use of solar energy is supported leading to reduced capital costs;
- Water quality is prioritised ensuring that it is of the highest international standard and that an effective monitoring process exists for such a purpose;
- Air quality is of the highest international standard and an effective monitoring process established for such a purpose;
- Information and education on fuel sources and their impact on air and environmental quality is provided;
- A commitment to ensuring Galway is an Oil Free City by 2030 is established and an action plan developed to ensure the achievement of this goal;
- Galway Energy Agency is reconstituted to promote and monitor an increase in renewable and clean energies;

Ireland 2040 should ensure the protection of its green infrastructure and biodiversity. It should put in place special measures to protect what exists in Galway City and to develop strategies to develop its green infrastructure and biodiversity further.

Planning, Transport and Infrastructure

The GCCN goal is the development of Galway as a city where all policies, plans and processes are future proofed, inclusive and participatory with good urban land use planning and well-connected regional development which balances priorities between those who live here and those who commute in and out of the city. A city of universal accessibility where all people can access services and facilities. A city with a pedestrian-friendly, cycling friendly, disability friendly and child friendly infrastructure. A city where healthy choices are easy to make. Ireland 2040 must ensure the infrastructure for this to be enabled.

Ireland 2040 must be concerned with ensuring sustainable transport. GCCN policy on transport is based on a Hierarchy of Road Users in the following order; pedestrians and people with disabilities, cyclists, public transport and private motor transport. GCCN endorses the European Charter of Pedestrian Rights and the Road Danger Reduction Charter. GCCN recognises that following a car-centred approach based on prioritising 'flow' for motor vehicles then results in roads designs and roads management practices that are hostile for vulnerable roads users and have the net effect of increasing motor traffic. GCCN notes that documents such as the National Cycle Policy Framework, the Design Manual for Urban Roads and Streets and the NTA Permeability Best Practice Guide seek to address inappropriate and unsuitable

roads management and town planning practices. The network endorses the overall approach advocated in these documents.

GCCN calls on Ireland 2040 to prioritise sustainable public transport and cycling over the building of roads. An exploration of the development of a Light Rail Network, including mini bus feeders and park and ride facilities, that will serve the people of Galway now and into the future be undertaken.

Universal accessibility and land use planning

GCCN proposes that;

- All land use planning is accessibility and equality proofed.
- Future development is mixed-use and orientated to access to public transport and other key facilities especially in schools and workplaces;
- Mechanisms and approaches for incentivising people to live in the city are established;
- Higher density residential development is concentrated in the city and surrounding towns, rather than in the form of one-off housing and urban sprawl;
- Heritage in the city should be protected and promoted;
- All new streets and buildings are designed at the human scale and allow for safe and comfortable access for all people, including those with visual, mobility and other impairments;
- Existing streets and buildings are adequately maintained and retrofitted where necessary to ensure safe and comfortable access for all people;

GCCN also proposes that all public participation structures and processes designed to facilitate and enable community participation and the outcomes from such structures and processes are reviewed and evaluated.

Sports Recreation and Amenity

GCCN calls on Ireland 2040 to ensure adequate recreation and amenities for all ages and abilities to be included in all planning and retrofitted where necessary to ensure that all communities have access to appropriate facilities. **GCCN proposes that;**

- Recreation grounds, community centres and amenities are accessible, affordable and available for use by all members of the community particularly those who are socio-economically, culturally and otherwise marginalised.
- Community facilities are not privatised but supported as sustainable social enterprises^x.
- A Galway Horse Project similar to those developed by Traveller organisations and community groups in other parts of the country is established, enabling Travellers and urban horse owners to continue to engage with horses in a safe area. A Galway Horse Project could also develop an innovative approach to inter-cultural education in schools as part of the Galway Capital of Culture 2020 programme.

- Safe travelling routes to amenities and recreational grounds are provided including for example, bike routes away from traffic, pedestrian crossings, traffic calming systems, lowering of speed limits and addressing 'rat-runs';
- Safe areas are established in residential areas which; favour pedestrians and children's play areas over traffic, have speed limits of walking speed and separate roads with access for bicycles, buses and pedestrians from those open to motor vehicles.

Economic Development and Enterprise

The GCCN goal is the development of Galway as the leading city for social enterprise in Ireland with implementation and mainstreaming of good models of social enterprise. A city where there is planning by design to protect the city, with Integrated, sustainable and universally accessible social and economic development. A city that recognises and builds existing potential in a broad range of sectors and prioritises indigenous, local enterprise that builds local resilience. **GCCN proposes that;**

- Proactive support for investment in social enterprise from all relevant public agencies be prioritised with a strong focus on social enterprise in the implementation of the Galway City Local, Economic and Community Plan;
- A national plan for social enterprise^x is developed;
- The LECP include specific provision for support mechanisms for social enterprises that are developed by Travellers and Traveller organisations, and existing social enterprises in the city should continue to be supported.
- Entrepreneurship potential amongst ethnic minorities is stimulated and supported as recommended by the small-business forum (2006), setting of targets to improve the rate of business start-up activity, and routine collection of information by enterprise agencies on the take-up of their services by members of minority ethnic communities including Travellers.
- Concrete plans for mitigating youth unemployment are developed emphasizing the need for institutional collaboration and coordination among government, educational institutions and employers with the aim of bridging the experience gap. In order to address the education-employment nexus, the potential for internships and apprenticeship with local private business and voluntary and statutory agencies should be explored. The following goals could be used for targeted output-based youth employment schemes:
 - Skills – increase the number of apprenticeship niches for young people
 - Education – increase opportunities for young people not in full time education or employment by expanding non-formal education, and vocational skill training with the aim of promoting the technical and professional knowledge of young people as this enhances their career mobility and quality of life.

Housing and Accommodation

The GCCN goal is the development of Galway as a city without poverty without homelessness and with an adequate, affordable, sustainable supply of universally accessible, quality housing and appropriate

accommodation for Travellers. A city where older people, young people and those most vulnerable to homelessness are supported and empowered. A city where there is mixed use transport oriented developments with planning based on the current and future needs of the population and where all housing is used to its full potential. GCCN proposes that;

Supply

- Proofing of supply is undertaken including in relation to poverty/social inclusion/access and culturally appropriate provision;
- Other models of supply be explored and piloted in close collaboration with the networks and groups in the city with an interest in housing and accommodation issues;
- Social housing is fast tracked as a matter of urgency;
- A more proactive approach is taken in dealing with and utilising local voids;
- The possibilities afforded by large scale mixed use developments comprised of social housing, affordable rental and affordable private housing are explored;
- Where private rented tenancies are being terminated, more proactive coordinated response is taken by the local authority to prevent families and individuals falling into homelessness.
- The local authority assumes greater responsibility for protecting the rights of those on the housing list who are in private rented accommodation;
- Greater use of Compulsory Purchase Orders for the acquisition of land for integrated development;
- A role for the local authority in the provision of affordable student accommodation provision be explored and university expansion should be future-proofed in line with student accommodation requirements;
- The new National Housing strategy, *Rebuilding Ireland*, is used as a mechanism for ensuring investment in housing in Galway City, particularly in the area of social housing;
- The local authority require that social and private rented housing meet the minimum standard regulations²¹.

Traveller accommodation

- Plans and targets in the Traveller Accommodation Plan are met as a matter of urgency;
- Traveller ethnicity is recognised in the development of culturally appropriate Traveller accommodation allowing and planning for the cultural needs of the Traveller community;
- Meaningful consultation with Travellers, giving Travellers greater say and power in decision making;
- Greater cooperation between the Local Traveller Accommodation Consultative Committee and the Housing SPC is required. A commitment is needed to realising equality outcomes for the Traveller community in relation to their accommodation needs;
- An independent National Traveller Accommodation Agency be established.

Partnership

- Galway City Council develop a more proactive approach towards building partnership and engagement with private landlords. Such partnership should at all stages include community representation and participation with inbuilt monitoring and proofing elements;
- Investment in voluntary housing bodies be continued as a means to increase the local social housing supply;
- Sustainable citizen initiatives such as Housing Cooperatives, Community Land Trusts, Co-Housing, and off-grid developments are supported;
- Local Authority coordination of fora and structures for community and voluntary participation is improved;
- A stronger sense of urgency in relation to housing is needed;
- Greater coordination between city and county council housing lists is required.

Needs based planning

- A Public Architectural Database concerning all aspects of Galway City Development and its urban structure: history, archaeology, morphology and housing typology be established;
- All housing and accommodation provision and planning be future proofed;
- Life cycle planning is placed at the core of housing planning recognising different accommodation needs and requirements of the population at different stages of their lives;
- Two-bed houses for single person households be permitted and developed;
- Greater supply of 4-5 bed accommodation for larger families;
- Galway City Council look to restructuring the mortgage to rent scheme to increase accessibility; Galway City Council should develop tenant participation/estate management strategies. A model of good practice be developed in consultation with GCCN and groups with a specific interest in housing and accommodation rights.

Independence and accessibility for all

- Greater supports for older people to remain at home and in their;
- All local authority/social housing are universally accessible in their design;
- All social housing developments are planned and built with the aim of building supportive age and disability appropriate accommodation;
- Sheltered schemes be considered in larger developments facilitating integration.

Supporting 18-25 Year Olds

GCCN proposes that;

- The specific difficulties of this age cohort are recognised in housing planning and provision and their particular vulnerabilities to homelessness addressed;
- A national policy to address poverty and homelessness amongst this age cohort be developed;
- The needs of young people coming out of care are assessed and catered for in a holistic way.

Homelessness Prevention & Avenues out of Homelessness

- Security of tenure in the private rented sector is improved as a critical homelessness intervention and prevention strategy;
- The local authority should support and develop initiatives that help prevent the occurrence of homelessness;
- Greater supports for those who move out of homelessness to stay out of homelessness be provided;
- The *housing first* model^{xvii} of addressing homelessness is required moving away from the staircase model^{xviii}.

Use of schemes

- Capital assistance funding is restructured as a rolling scheme;
- As HAP is a social housing support all local authorities should be responsible for recruiting landlords to the scheme and be responsible for providing alternative accommodation for a tenant in the event that a HAP tenancy is terminated.
- A scheme to incentivise those in local authority housing to downsize while remaining in their communities be explored following a scoping exercise.

<http://www.irishstatutebook.ie/eli/2014/act/25/enacted/en/html>

^{ix} International Convention on the Elimination of all Form of Racial Discrimination

<http://www2.ohchr.org/english/bodies/cerd/>

^x UN Convention on the Elimination of Discrimination against Women

<http://www.un.org/womenwatch/daw/cedaw/>

^{xvii} Convention on the Rights of the Child <http://www.ohchr.org/EN/ProfessionalInterest/Pages/CRC.aspx>

^{xviii} Convention on the Rights of Persons with Disabilities

<http://www.un.org/disabilities/convention/conventionfull.shtml>

^{xix} <http://www.nascireland.org/campaigns-for-change/direct-provision/>

^{xx} White Paper - Ireland's Transition to a Low Carbon Energy Future 2015-2030

<http://www.dcenr.gov.ie/energy/en-ie/Energy-Initiatives/Pages/White-Paper-on-Energy-Policy-in-Ireland.aspx>

^{xviii} The transition to a more circular economy, where the value of products, materials and resources is maintained in the economy for as long as possible, and the generation of waste minimised, is an essential contribution to the EU's efforts to develop a sustainable, low carbon, resource efficient and competitive economy. Such transition is the opportunity to transform our economy and generate new and sustainable competitive advantages for Europe¹ - Closing the loop - An EU action plan for the Circular Economy European Commission Feb 2015 <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52015DC0614>

^{ix} A social enterprise is an operator in the social economy whose main objective is to have a social impact rather than make a profit for their owners or shareholders. It operates by providing goods and services for the market in an entrepreneurial and innovative fashion and uses its profits primarily to achieve social objectives. It is managed

in an open and responsible manner and, particularly, involves employees, consumers and stakeholders affected by its commercial activities. <http://ec.europa.eu/growth/sectors/social-economy/enterprises/>

⁹ see

http://www.housing.gov.ie/sites/default/files/attachments/forfas_social_enterprise_in_ireland_sectoral_opportunities_and_policy_issues_publication.pdf

¹⁰ Housing (Standards for Rented Houses) Regulations 2008; Housing (Standards for Rented Houses)(Amendment) Regulations 2009

¹¹ Housing first is a model for tackling homelessness that originates with Dr Sam Tsemberis and the Pathways to Housing organisation in New York. The model has been widely used in the USA and has, in more recent years, been adopted by homeless agencies in Australia, Canada, EU and Japan. The housing first model focuses on the immediate provision of long term/permanent accommodation for the homeless with supports and services subsequently built around the needs of each individual. <https://www.pmvtrust.ie/our-services/housing-with-support-service/housing-first/>

¹² The housing first model differs significantly from the treatment first or staircase model. The staircase model works on the basis that a homeless person must deal with issues that gave rise to their homelessness, or have arisen as a result of homelessness, (e.g. drug and alcohol misuse, mental health issues, etc) before they are ready for long term accommodation. <https://www.pmvtrust.ie/our-services/housing-with-support-service/housing-first/>

