

NPF Submissions
Forward Planning Section
Department of Housing, Planning, Community & Local Government
Custom House
Dublin 1.

29th March 2017

‘Ireland 2040’

Dear Sir,

In a personal capacity I wish to make the following submission, to have its contents considered as part of the public consultation process members of the Oireachtas will be working towards in the compilation of a new ‘National Spatial Strategy’ to be known henceforth, as the ‘National Planning Framework’.

As an active member of An Taisce - Irelands National Trust I am aware that the Trust are to make a significant, well researched submission on behalf of the membership of An Taisce and its supporters in Ireland. However, as an individual member in my own right, I am making the following submission from a particular Galway City perspective.

Introductory remarks:

Climate change is the overriding threat to the biosphere and its human interface. The most recent research presented through the Inter-Governmental Panel on Climate Change has moved upwards their projections of sea level rise by the end of this century to a level of 1 metre. This has implications for Ireland, and more particularly for Galway City & the surrounding County. Future projected variability in rainfall levels raise the issue of the long term stability of carbon sink performance of peat lands across the West of Ireland, as well as posing serious Flood Risks for vulnerable parts of our historic city at places such as the Spanish Parade, the Docks/Long Walk, in the Claddagh and Salthill areas these changes will make some difference in the way we must plan for the kind of physical changes needed for future protection and economic development in our City & County!

In a report just published, in which it indicates just how serious things are getting, the UN’s weather agency the World Meteorological Organisation has said:

“History was made on the weather front in 2016 when it became the warmest year on record. Multiple climate-related records were broken last year, according to the annual climate statement of the UN’s weather agency, the World Meteorological Organisation (WMO).

At 1.1 degrees above pre-industrial levels, the temperature increase broke the previous milestone set only the year before by 0.06 degrees.

Globally-averaged sea surface temperatures were the warmest on record. Global sea levels rose strongly during 2015/2016 with El Niño, reaching record highs in early 2016.

Oceans were unusually warm, global sea levels rose sharply, Arctic sea ice was well below average for most of the year and severe droughts hit southern and eastern Africa and Central America. Carbon dioxide emissions reached their highest levels yet”.

Environmental Imperative: We are now all even more aware that over 97% of climate scientists have shown that climate change *is man-made*. Indeed many 21st century scientists and ecologists say we have entered a new man-made geological epoch that will “*irreversibly*” change the face of our planet – the ‘*Anthropocene*’. So says, *Stefania Barca*, environmental historian.

Sinead Mercier, then tells us that ‘Our alienation from Nature is not the natural result of anything , not the result of inherent human greed and cruelty. Our alienation is deliberate and tied to an existing system where the culpability for harm, whether the banking crisis or deaths in Ranza Plaza, is dissipated through complex legal networks. Culpability is sucked away from its source and spread out to fix upon the bodies of front-line workers who bear the brunt of the blame and the brunt of the damage – environmentally, physically, financially’. *Sinead Mercier* LL.M (LSE) is a Dail Researcher and former consultant in climate change and environmental law. These two quotations I have taken from recent *Village* magazine articles help me understand the reasons for how the physical changes worldwide and in Galway, in both County & City are being driven, not by nature, but are man-made and result from planning decisions taken by both Local Authorities, by national governments, business organisations, and those made by ourselves!

Specific Areas of Planning Important to the future development of Galway are covered here as follows:

- 1. Climate**
- 2. Rural Ireland and Once-Off housing impacts on the city**
- 3. Transport Issues**
- 4. Light Rail for Galway**
- 5. Ceannt Station as a Multi-Modal transport hub**
- 6. Enterprise & Employment**
- 7. Galways Harbour Development**
- 8. Conclusions.**

1) Climate Change is having significant negative Impact on Galway:

The scientific evidence on man-made global warming is by now unequivocal. By the end of this century the use of fossil fuels must cease, requiring the complete decarbonisation of our transport and energy systems. In any event, by the middle of this century the global demand for fossil fuels will outstrip supply resulting in significant energy price inflation, particularly

for transport. This requires that we make complete transition to more sustainable modes of transport and a transformation in how we use energy.

President Higgins has warned that any ***'Failure to respond to the scientific reality of climate change may ultimately lead to the destruction of life on our planet.'***

President Higgins also said, we must *“unequivocally reject the position of those who would obscure the scientific reality of climate change in their protection of any narrow and short-term self-interest. The first ethical test is in accepting that there can be no compromise with truth. Ours may be the final generation with the opportunity to effectively respond to the now urgent effects of climate change”*.

Meanwhile former President Mary Robinson at the same event also commented, that a planned US\$100 billion annual *“green climate fund”* [before President Trumps election] constitutes *“collective global recognition that while today’s rich countries built their prosperity from fossil fuels and unsustainable land use, leaders from the developing world are trying to find a way to a more sustainable model of developing without emissions,”* Mrs Robinson said.

Both presidents were speaking at the *‘Summit of Consciences for the Climate’* event in Paris. Earlier in that year, Pope Francis had also warned that our lifestyles were turning the world into an *“immense pile of filth”*, while UN Secretary General Ban Ki-Moon has said the world's nations must agree to reduce emissions to avoid certain catastrophe.

There is obvious concern at international level, which are government must now respond to!

2) Rural Ireland is a critical resource for a post-carbon world:

The moral authority is therefore now with all those environmentalists that for many years have had to put up with regular abuse being meted out by politicians and others, who would have us construct yet more roads and also, allow be built the many thousands of new houses in almost every corner of our rural environment (so called **One-Off houses**). This is damaging for the futures of small farmers, our rural towns and villages and for all who continue to live in the west of Ireland, in areas peripheral to Galway and the City itself.

The negative implications for current rural housing policy and for the ongoing provision of viable public services, must in future be part of any discussion arising from the ashes of past poor implementation and enforcement of planning policies by both Galway City & County Councils. The words *have regard to* are not strong enough, proper enforcement is required.

The historic failure of, *thoughtful*, spatial planning in Ireland, particularly in County Galway, goes back for decades; following on from a previous governments refusal to adopt the ideas of Sir Colin Buchanan in the late 1960’s where in a major report he had recommended that nationally, *“industrial development [should be] in about 10 centres.”*

Where the IDA had looked for 160. Sounds very much like the more recent McCreevey 'decentralisation' policy, so disastrously adopted in Ireland a few years back.

It is my view, that this failure to plan 'Strategically' has been the root cause of many of today's problems with vehicle traffic, as in Dublin, commuting from distance by car is now affecting the whole country, in Galway city particularly, and has implications for many living in rural areas immediately surrounding Galway where the problems of *Rural Sprawl* and *Car Dependency* have grown ever more rapidly in recent years. The deficiency in provision of access to adequate public transport, with many established bus routes even now under threat of being cut back, and with greater travel distances in rural areas, has necessitated the use of more cars for the increasing numbers of rural households that have no access to viable public transport services.

Dr. James Wickham of Trinity College Dublin, in a paper he presented to TASC (an independent think-tank on social issues, based in Dublin) reminds us that "the corollary of poor public transport is car dependency, where people use cars because they have no choice of any alternative mode of transport. In a car-dependent city it is essential to own a car (or at least have access to one) in order to participate in normal activities not just employment, but shopping, socialising, etc."

All this concentration on building more new roads has had negative impacts for increasing the amounts of commuter traffic being forced to enter the city! For that is where most jobs were, are to be, or, are already, being created!

When responding to the publication of Galway County Councils 'Draft' Development Plan in July 2002, City Manager *Mr. John Tierney* was urged to write to *Donal O'Donoghue* his opposite number, expressing concern over policies which it was felt would continue to promote a wider spread of settlement around Galway, and not the concentration into 38 towns villages, along with the proposed, joint, development of Ardaun that had been expected after publication of the new Buchanan authored, Draft Transport and Planning Study in 2001.

John Tierney did this at the insistence of members of the then existing 'Integrated Transport Policy Group' in Galway City, of which I was then a member. Committee members had expressed alarm on observing the release of the '2002 Draft County Plan', contents of which had proposed a significant freeing up of planning permissions to allow for even more unsupported 'Once-Off' housing.

Tierney went on to state "The cumulative effect of these policies/objectives all greatly undermines the 'Galway Transport & Planning Study' GTPS., any sustainable approach to a settlement structure and consequently any ability to promote a sustainable public transport system. It would exacerbate the current dependence on private vehicular transport and the consequent negative effects of this." Letter to *Donal O'Donoghue* Galway County Manager (RIP) 23rd July 2002.

Environmental NGO's attempts to curb the excesses in the County plan went largely unheeded, and widespread increase in 'One-Off' housing in County Galway has continued to this day, almost unabated. The CSO indicate the number of One-Off houses granted permission between 2001-2015 is 182,061 and the number of septic tank's in use has mushroomed to 433,000 + nationally. Leading to even more water pollution. Such lack of effective planning control, perhaps, encouraged the emergence of cryptosporidium, which few people had heard of before, imposing greater capital cost for emergency water treatments with consequent impacts also on increasing the amounts of car commuting from rural areas into Galway! In this way, any ideas around Ireland developing a long-term strategic NSS for planning, whereby people might be sustainably housed has failed, due to thousands of individual acts of resistance to 'sustainable' planning control – cumulatively undermining the whole foundation of subsequent government's having adopted an actually '*sensible planning strategy*'.

In 1976, the then An Foras Forbatha published a report which demonstrated that widely scattered houses cost the State between three and five times more to service than closely knit dwellings (An Foras Forbatha 1976).

A 'development' at all costs parochial style of planning culture was all pervasive throughout these Celtic Tiger years. Where anyone found questioning such development proposals was often pilloried in the media by national, as well as local politicians. Particularly anyone who also just happened to be a member of An Taisce, a former Taoiseach going so far as to 'wish' that objectors and 'whingers' would 'consider committing suicide'. An Foras Forbathas findings are as relevant today as they were 35 years ago. The only difference being that the cost differential is now likely to have significantly widened due to increasing labour costs and the greater range of complex services now provided by the State.

The only true sustainable form of rural housing development is the village/small town cluster, which allows for the efficient delivery of services and infrastructure; enhances social capital, provides a compact walkable community; and the protection of the natural environment.

New 'One-Off' dwellings should be strictly regulated and new housing demand instead be directed towards nucleated settlements through a plan-led approach. In principle, there should be a strong general presumption against all new dwellings outside locations where the services and infrastructure required by citizens cannot be effectively and efficiently delivered at a reasonable cost.

Only households with a clearly identifiable/verifiable rural need (i.e. immediately and directly involved in agriculture, forestry or other rural based primary employment in the locality) should be permitted to build outside of serviced settlements and only after demonstrating that no alternative existing dwellings are available to meet their needs.

In 2002 the new NSS had suggested that *'In order to achieve more balanced regional development, a greater share of economic activity must take place outside the GDA' (p. 3).*

Thus increasing the rate of growth and the share of growth in regions other than the GDA, Greater Dublin Area, and/or curtailing the rate of growth in the GDA, reducing its share of national economic activity. Elsewhere the NSS argued that *'all areas should experience growth... by increasing economic activity in all areas' (p. 4).*

The other concept which was prevalent throughout the NSS, but not followed through, is that of realising **potential** and many would argue that this, rather than reducing disparities, became the main definition. *'In essence, balanced regional development means developing the full potential of each area to contribute to the optimal performance of the State as a whole – economically, socially and environmentally' (p.11)*

Then came the financial crash, leaving behind it many ghost estates, some 15 of which are still in place in county Galway.

The role of the 2002 National Spatial Strategy (NSS) was seriously undermined by Minister Hogan, who in February 2013 stated that the National Spatial Strategy was to be scrapped, to be replaced by a new policy, details of which are still awaited!

The President of the Irish Planning Institute summed all this up in a letter to the Irish Times, when referring to the debate on establishing an Eircode.

Mary Hughes, president of the IPI commented, that:-

"Eircode highlights the abnormal costs and complex issues raised by the proliferation of one-off housing in the Irish countryside. Today there are over 433,000 one-off rural houses in Ireland (25% of national housing stock), triggering a range of environmental, economic and social problems and impeding the efficient delivery of services. The implications of rural housing and the ongoing provision of viable services must be part of the discussion arising from the roll-out of Eircode." Irish-Times – letters – 15th July 2015.

The Eircode has been adopted, but debate continues, with special regard to the continuing promotion of car dependence for those people living in the countryside, and consequent negative impacts added onto the growth of traffic in Galway City!

New energy efficient housing must in future be constructed in areas of our principle cities, such as Galway that must have access to services such as schools, colleges, leisure and employment opportunities. With public transport put in place as the normal acceptable mode for accessing these services. Energy efficiency of homes, which should be built to Passive House standards, and all public transport being electricity powered the optimum being possible.

3) Transport Planning Issues:

The clear policy of any new National Planning Framework, should be to encourage the County and City into working under a new - *Regional Transportation Planning Unit, operating with TII and the Department of Transport.*

Recent reduced economic growth, and the revision of budgets for infrastructural investment in public transport through Transport 21 has in the past done, and will continue to do serious damage, Reduced funding has delayed any opportunity to achieve sustainable land use and transport planning for an assured future. It also seems ludicrous that we would continue to have two adjacent Local Authorities separately developing policies, which compete against each other for funding, and which do not always fully mesh - one with the other.

The past twenty year period of concentration on building more roads and motorways, while ignoring comments about also improving the public transport networks mentioned in Buchanans GTPS, have led us into a cul de sac where access to decent public transport options that actually work is failing in Galway. The the past couple of weeks experience for commuters during the strike by Bus Eireann, has led to chaos on roads leading into Galway and on city roads, is an indication if ever needed, that major road building is failing to deliver!

In the UK. *The National Audit Office*, who scrutinize value for money for the taxpayer, has just issued a critical report on how the current £15bn Road Investment Strategy is faring in practice. It found that the RIS was put together in a hurry, bringing risks for “deliverability, affordability and value for money”.

To me, this represents an indication that there needs to be in Ireland, a challenge to the ‘Road Building Consensus’. That here in Ireland we also need to learn from previous road schemes, to plan for a better ‘Rail-Based transport future! **For both passengers and for freight!**

Government has reaffirmed its “strong belief in the value of a forward-looking, visionary and dynamic planning process because it will ensure that *the right development takes place in the right locations at the right time and in providing the social, economic and physical infrastructure necessary to meet the needs of the people in a way that protects the many qualities of our natural and built environment.*” ‘*Environment, Community and Local Government*’ – **Planning Policy Statement**, released in January 2015.

The following are just two out of ten, **Key Principles**, contained in the Governments statement which are seen to us as being relevant, the first is:-

“Planning must support the transition to a low carbon future and adapt to a changing climate [*securing less energy and travel intensive development patterns*] taking full account of flood risk and facilitating, as appropriate, the use of renewable resources, particularly the development of alternative indigenous energy resources”

“Planning must ensure that development facilitates and encourages greater use of public transport as well as making walking and cycling more attractive for people in support of active and healthy lifestyles by focusing development, whenever possible, at locations with more sustainable travel options.”

Since taking office this and the previous government had regrettably shown little interest in taking any of the critical steps necessary towards steering Ireland onto a zero emissions pathway – from lack of action on energy saving and retrofitting of houses, to its present car-based (NRA inspired) transport policy (annual transport emissions are forecast to rise by 66% before 2030, according to Irish EPA estimates). Rather than producing ‘Action Plans’, there has been an unacceptable level of ‘Inaction’.

It must be recognized that many of the planning and transport problems of the Greater Galway and surrounding area, are a result of local authorities deference to local vested interests in accommodating excessive rezonings, in allowing planning applications proceed in contravention of statutory regional and national spatial planning policy, and the failure of the regional authorities and other "prescribed authorities" under the Planning Acts and Regulations, to take effective action to put any stop to this madness .

It can be observed that *"housing development is spreading throughout the GGA to an extent not envisaged by the SPGs"* accompanied by an *"an increase in long-distance commuting"* and *"the spread of housing development has made the provision of attractive public transport difficult. The consequent travel mode decisions lead to a car-based commuting pattern and increasing congestion"*.

The warning was then made by An Taisce that, *"if current trends persist by 2016, much of the Greater Galway Area may have the following characteristics:*

** More of the countryside around Galway city will resemble an ultra-low density suburb (or "exurb")*

** Since dispersed development will continue at a substantial scale, public transport will often be unviable and car use will continue to be high for journeys to work, shops and schools. There will be worsening congestion at peak times, even in some village areas (eg, recent examples of Claregalway, Oranmore and Barna are stark reminders).*

** Major shopping destinations will disperse to the edge of towns, as congestion in the whole regional territory grows, and an edge city or "doughnut" economy will emerge by degrees*

**The completion of new motorway developments at M17, M18 from Gort to Tuam will see Galway City bypassed with emphasis on future North to South axis of development, including extension to Athenry in the east*

** As a result, Galway City may decline economically and socially".*

This analysis does not just give voice to the traffic congestion now being experienced in the Greater Galway Area, or in specific places such as Parkmore, which has traffic that is being generated from across the city, but also from the county and from counties outside the GGA. Wholly car based development exacerbated by rezoning decisions such as are being made in towns & villages all over Co Galway and beyond, now threatens economic efficiency economic growth and national competitiveness, and the timely and efficient delivery of goods and services in the city.

The problems of growth occurring in the Dublin area that are even now being replicated in many other major urban centers, especially in Co Galway and in the city.

There is a clear need for planners in Galway city to concentrate on building housing at a higher-density and in areas much closer to places of major employment. The east side of the city is where most of the larger industry and business development has been more recently located. Yet much of the city's housing is still located west of the city. It is clear that in future more housing will be need to be located east of the centre. It is also essential that future housing policies encourage a growth in higher-density serviced housing development, not simply high-rise, but higher density.

This usually takes the form of apartment construction that will encourage development of effective public transport. However, Galways past 1970s experience in building medium-rise apartments in Ragoon, was a disaster, not only because services were not provided as part of the original scheme. But that selection of suitable tenant's was faulty. Nevertheless, a return to a form of modern higher density in housing development in the city must be revisited.

If high-frequency, high-quality public transport is to be a success and be made economically viable for Galway higher density housing developments must surely be an essential component. Future housing construction must follow along the routes taken by, say, a proposed new Light-Rail Transit. With improved bus links also serving the route along the N6 out towards the motorway, with connections leading to Dublin and Limerick, as this is where the new Economic Development Corridor is currently being promoted to run by Galway County Council.

The idea of a planned housing development at **Ardaun**, where most zoned land is still held in private ownership, where there are no installed water services, a self-contained urban village is to be connected to the city centre by a public transport corridor. This idea is doomed to failure, in my opinion.

Since Buchanan first proposed this, the Dublin – Galway motorway M6 has been built through the area dividing Ardauns land bank. This road has carved its way through lands that were being set aside for housing in Ardaun.

More recently, we have learned that 54 hectares of lands designated for such housing are now likely to be taken up in providing road linkages from the motorway to the M6 Ring Road, in effect dividing ever further lands that were until now being set aside for housing and schools etc. This is going to make it even more difficult to provide effective public transport services into to Ardaun, with the new suburb becoming a mirror of previous poorly serviced developments in Knocknacarra.

As a recent article in the 26th March edition 'Sunday Independent' headline tells us, "**Lack of vision has left us in the slow lane**". Niamh Horan, in discussing the pressing concerns around government failure to invest in sustainable public transport, went on to say that "*Our outdated public transport system is the reason for heavy traffic, despite the Taoiseachs claim that gridlock is a sign of success*". Ms Horan was speaking about traffic in Dublin no doubt.

If Ms Horan took a trip to Galway today, during Bus Eireanns current drivers strike, she would I am sure be shocked to witness the extreme levels of car dependence which have built up over the past two decades, witnessing the tail backs of traffic in and around Galway City, out into the County!

Like most journalists writing in a mostly Dublin based Irish media, Ms Horan should spare a thought and do a little research into, and then report on what is also happening in the sticks! I would urge that more of our leading journalists would be made spend a day in Galway, or Cork or even Limerick where they might get a feel for the utter depression being experienced by many workers who struggle to, daily, get into and out of work, without ending up in a state of mental exhaustion.

Public Transport Infrastructure, delivery:

- It might then be realised that certain Irish cities have fallen far behind some of their counterparts in undeveloped countries in terms of provision for public transport. An Taisce has in the past referred to cities such as Bogotá in Colombia and Curitiba in Brazil and marvel at their use of integrated ticketing and real time passenger information. Galway, as in other areas must catch up rapidly by installing such developments. Yes Galway is installing real time passenger information at bus stops, but must go further to increase bus frequencies. It must be made clear from proposed legislative structures, that the role of other bodies is primarily to further support the NTAs goal of installing sustainable transport where it is most needed.

- The NTA must demonstrate a comprehensive research base.

- The NTA must then be given legislative power to embrace land use and planning and to allow it to intervene in development outside the Greater Galway Area, as defined in the Regional Planning Guidelines, where there is a land use and transport impact on the area as a whole.

- The NTA should be given the overview role in delivery of investment proposed in Transport 21, to meet timescale and budget and meeting of modal share targets, including bus and cycle lane delivery.

Integrated Transport Management:

Information should be sought on the most effective transport management systems being used from other European cities.

The NTA will need to take the initiative to *introduce* and then coordinate:

- *Measures to reduce air particle pollution emissions and transport generated green house gas emissions*
- *Effective public information and promotion of public transport, cycling and car pooling*
- *Management of unified ticket scheme for public transport use*
- *Management of school transport including promoting of walking, buses and cycling, with safe supervised routes*
- *Integrated traffic management*
- *Regulation and control of Heavy Goods Vehicle (HGV) movement including introduction of restriction zones in central Galway City*
- *Implementation of integrated pricing structure for parking as primary demand management tool. Given the difficulty of introducing a road pricing structure in the immediate term, an integrated pricing structure should be put in place on car parking, particularly in and around employment, retail and leisure uses, with the revenue going to public transport enhancement.*
- *Monitoring of air particle emissions and noise and taking of action before risk of EU Directive breaches arise.*

4) New Public Transport Options, with consideration for Light Rail as an Option is Needed:

In his regular UK Guardian column of 20th September 2016, George Monbiot made the following comment:

“Over half the car journeys people make in this country are less than five miles: this is what policy failure looks like. Why don't people cycle instead? Perhaps because, though the number of motorists killed or seriously injured has fallen sharply, the number of cyclists killed or hurt on the roads has climbed since 2003. This now accounts for [14% of all casualties](#), though cycling amounts to [only 1% of the distance we travel](#).”

The simplest, cheapest and healthiest solution to congestion is blocked by the failure to provide safe transit. Last year the [UK] transport department crowed that it could cut £23m from its budget as a result of an [“underspend on the Cycle Cities Ambition budget”](#). Instead

of handing this money back to the Treasury, it should have discovered why it wasn't spent, and ensured that it doesn't happen again.

The undercapacity of the roads arises from the overcapacity of the vehicles that use them. Average occupancy of cars in the UK is 1.6; and it seems to me that the bigger the car, the fewer people it tends to contain". George Monbiot.

Efforts at introducing bus and cycle lanes in around Galway city have been intermittent and have largely been ineffective by reason of their lack of continuity. While some bus routes have seen ridership increase in recent years, due to the increase in house building in certain areas, eg Doughuisce bus 409, and, with the introduction of better quality buses. There is however a recognized plateau beyond which bus ridership will not go. This is due to the infrequency of services.

A half hour wait is accepted as traditionally normal in Galway, but this is no longer good enough. There are insufficient bus services available on all routes from where many people live in the west of the city especially, going towards where many work in Parkmore/Ballybrit. There are no direct scheduled services crossing the Quincentennial Bridge in either direction! This has caused many people in Galway to suggest that a new form of hi-capacity passenger transport is needed.

Hence, the suggestion that what Galway really needs to see is the introduction of a radical system of Light Rail Transit across the city, similar to LUAS in Dublin.

Luas is street rail, more tram than S-Bahn. Critical difference is the distances in Galway do not require total segregation they just need to road lights to prioritise for the 400 people versus the 8 single person vehicles using the same amount of road space.

In 2010, city councilors voted to have a system of Light Rail investigated. In fact they voted twice for this to happen. But were frustrated when they were advised that housing in Galway was simply not dense enough along chosen routes to justify the cost? This is a classic case of which comes first, the chicken or egg? Recent experience from Luas in Dublin, shows that housing will soon follow along the route set by public transport and a premium is realised on the value of housing built near where public transport runs!

There are almost 30 small cities of same, similar, or smaller population density in Europe with functioning Light Rail Transit networks. It is accepted by many people living in Galway City, that if our vision is to be of a progressive forward looking city, then opting for Light Rail Transit must become a viable choice. Evidence is clear that reliance on roads based transport services which as a consequence continue the dominance of private car use, will continue to see regular gridlock in Galway! **There is now an alternative!**

If Galway is to continue being regarded as a ‘Gateway’ where new business opportunities can be realized and FDI companies are encouraged to locate. The city must turn away from providing only roads access to places of employment and build new transport systems that are energy and environmentally efficient. That can only be, in my opinion afforded by investing in better bus services or provision of a Light Rail Transit! See section 6.

5) Ceannt Station

There is an urgent need to complete the re-development of Ceannt Station for its future use as a multi-modal public transport interchange. This is now even more urgent if the city is to be able to handle improved public transport systems that are being directed through the centre. A multi-modal public/private transport interconnection is an immediate requirement, if public transport is to succeed in reducing excess car traffic in Galway.

Galway City Council, together with CIE, Bus Eireann, Iarnrod Eireann, private developers, all other stakeholders and the Galway community must bring forward a *Framework Plan*, and planning must be expedited for developing this essential facility. It should prioritise the advancement of public transport solutions and reserve land for such vital infrastructure, ahead of any commercial development of more hotels, shopping precincts or other luxury city centre apartments, which are all being mooted for this site.

Ten years ago (2007) a Galway City Innovation Fund application, advocated that the mainline rail track out to Athenry would be twinned, to increase opportunities for more rail commuters to use additional rail services from stops along this important route. Financial constraints, presumably, stopped this application from being implemented. This submission must be revived if mainline rail services in the hinterland of Galway City are to help in reducing car use in the city!

It is also recommended that electrification of all mainline rail services to Dublin should be a long-term aim to increase efficiencies and reduce oil fuel use on Irish Rail. This would all be in the public's best interest.

A proposed new access road bridging over Lough Atalia from Renmore (which was proposed in the last Development Plan) must again be assessed urgently. Since proposals to re-develop Galway’s Port area are also now dependent on getting new and better roads access into the docks area.

The development of an alternative Maintenance Garage for buses at the Harbour Enterprise Park was completed some years ago, where An Taisce’s view continues to be that the choice of site was wrong, as the high fuel use costs associated with shunting buses daily into and out of the garage on a daily basis to and from base at Ceannt station, would surely add considerably to Bus Eireann’s operational fuel budget.

With the Enwest Oil terminal, now Topaz, as its nearest neighbour this decision also drove a coach and horses through new SEVESO public safety regulations that were brought in on foot of the UKs Buncefield fuel depot explosion incident.

The new City Coach & Bus station, where it has been built at College Road, was, in my view a planning disgrace. In Buchanans Plan (1999), it was actually proposed to be built it where the now defunct Habitat shop and multi-storey car-park are, backing onto the existing Ceannt Station.

But a developer/builder got preference and city council officials in allowing this change of location across the Fairgreen Road missed an opportunity to create a much needed substantial bus terminus at the heart if the city. This has been a disaster from which the city is only now recovering!

The proposed development of Ceannt station as originally indicated by CIE architects Murray O’Laoire (2005), was clearly unacceptable in the form and scale being proposed at the time. Galway City Council has as yet no developed policy on high rise building. A 14 storied twin tower structure was being proposed there, and the creation of a new retail centre which completely missed the point and would only put pressure on existing City Centre Core retail businesses. With the potential for a light rail/tram system yet to be properly evaluated, or be developed in Galway it was more operational transport space that is needed in this area, not more shops.

6) Light Rail Trams for Galway?

Ken Livingstone, when Mayor of London some years ago, first proposed a new tramline for London's streets. It was to run for 20km between Shepherd's Bush and Uxbridge and carry 23 million passengers per year (see www.tfl.gov.uk/westlondontram).

In Galway, where our suburbs now stretch for 20 miles from east to west, we should be seriously pursuing the development of a tram service? The GLUAS, or GAL-TRAM as we have called it, could run from Bearna/Knocknacarra along the Western Distributor Road via Westside, with one branch passing over the Quincentennial Bridge and on through the Headford Road area to Ballybane, then on to Doughuisce and Ardaun (where we were being told 18,000 more people will be living by 2016), to Oranmore. While the other branch would cross the Corrib near the Salmon Weir bridge on through Eyre Square to Renmore through to Oranmore.

Galway City & County Councils recently purchased the former Carnmore airstrip, but have yet to find any purpose for its future use. I would suggest that its location is ideal for the development of Park & Ride connected to a new Light Rail Transit with a maintenance depot, from where commuters could transfer onto Trams – taking them on into work at Parkmore East & West, then to other IDA Business Parks at Ballybrit, Ballybane on into Renmore through to Ceannt Station and Eyre Square. A similar depot to the west side of Galway could be provided at Cappagh, or, eventually out at Bearna running back alongside the Western Distributor Road via Dunnes stores/Lidl at City-West, Ragoon, then along the Seamus Quirke Road in through UCHG lands past NUIG into Eyre Square.

A route through Salthill could also be a possibility.

Modern articulated trams can carry up to 300 passengers, compared with 120 on a bendy-bus (as are now used in Dublin) or 90 on a double-decker. A new tramway along the routes described, with a second line possible, would increase public transport capacity and could run at a frequency of every seven or eight minutes at peak times, allowing for further growth in passenger numbers.

For much of its route, GAL-TRAM could run on separate lanes to other traffic. Traffic lights along the route could be automated to give GAL-TRAM priority over other traffic. This would make it quicker and more reliable than buses. Park-and-ride parks could be made available at each end and at intermediate stops. All this for a price less than that of a Galway city outer bypass (estimated cost €650 million) and perhaps be completed more quickly!

Planners will argue that there isn't yet the residential density, or the passenger numbers to justify the level of investment required for trams. But many people in Galway believe economic advantages will quickly flow from building such a tramline. Residential and commercial high-density development would be certain to follow along the routes chosen, and this would soon see passenger numbers quickly increase, to make the system financially viable. After all, how quickly did the Quincentennial Bridge and its approach roads become inundated, overcrowded and outdated?

Galway City Council are looking at BRT as being cheaper to build and more flexible than light rail, but that is where its advantages end. Light Rail, by contrast:

- Attracts many more new passengers
- Has a much higher carrying capacity
- Has a 25-75 percent lower operating cost per passenger
- Attracts new private investment
- Produces no emissions at the tailpipe and lower overall emissions, regardless of the method of electricity generation
- Produces less overall greenhouse gases, and
- Encourages high-quality intensification through transit oriented development.

Galway deserves better than a “go slow” approach to the future it now suffers. Cities that embrace sustainable transformation and, there are many examples where cities have made the leap to light rail, are all reaping vast rewards.

7) Enterprise and Employment::

An Taisce favours the development of new industrial and business parks only be established on primary roads and where there are connections to the railway, at locations which make commuting by public transport easier for workers than choosing the car first.

There should be no further imbalance in the development of industrial/business parks, with almost all of them being built solely on the eastside of the city.

As with sensitive planning and proper marketing, anywhere, there should be no reason why certain business cannot also expand on the west side of the city.

With the predicted impacts of Britains Brexit meaning that some banking and financial services can be expected to relocate to Ireland. Some of them to Galway even. Smarter industries can perhaps be attracted to set up in the heart of the city, but only if the IDA and City Hall work together to promote the positive advantages for firms coming here. The question then arises is the question of where these new workers will live. It cannot be expected that they will choose to live outside of Galway but, suitable housing will be needed and must be planned for.

I genuinely believe that Limerick-Shannon-Galway axis if marketed by the IDA as a single region, has the capacity to deliver something like Heidleberg-Mannheim-Karlsruhe do in terms of critical mass over the next 30 years. This region has everything, a great port at Limerick/Foynes, an airport at Shannon and research led University at Galway. We need to get away from the 'rural planning guidelines' focussed on spatial planning to begin to unlock the potential in this region in the West!

“Biomedical Science and Engineering Research clusters are emerging as one of the most important growth areas in terms of demand for growth of student places.” So said the blurb which introduced the proposal to build the new ‘Science Research Building’ at NUI Galway.

Galway now has 9 of the top 10 medical device development companies based in the city.

The spin off for industry’s which will feed off of such university developments (which is located on the Westside of the city), needs to be encouraged. Mobility plans and Public-Transport access needs to be high on the list of requirements for all such new industries.

Galway City could have its own version of Dublins ‘Grand Canal Docks’ development, though on a slightly smaller scale, as in Dublins newest area of development. New housing, tourism and leisure as well as developing Business Innovation Hubs. All linked to Ceannt Station transport hub. See below!

8) Galway Harbour Regeneration:

Framework Planning:

The RIAI (Royal Institute for Architects in Ireland) has consistently sought that local authorities would use Framework Planning, to help ensure cohesive development, that no mistakes are made which might lead to the construction of yet more ‘functional’ boxes - many of which have no architectural merit. Galway has long suffered from this type of building with so many modern gems offering nothing more than a visual and architectural affront to good planning.

The present effect of so much that has been built around Galway's docks, indicates that there has been a lack of vision from planners, giving the area the appearance of a 'mouth full' of broken teeth. The city of Stockholm is a waterfront city. Yet authorities there have managed to blend the old and historic with significant new development!

The outcome of any plan for the development of a new port at the *Harbour Enterprise Park* is still awaited. But, as yet, there has been no development plan drawn up to indicate what is to be done with the existing, soon to be redundant commercial docks area (32 acres) should the Harbour Companies application succeed. There is also no Plan B should their application fail!. As I expect it will.

We have long been told that apart from the probability of some sort of hotel, apartment and marina developments - that there will also be a certain amount of cultural, heritage and public amenities provided there. I am convinced that more information is required on *precisely* what *should* be built there.

The city cannot afford yet another Eyre Square debacle, due to the fact that no agreed plan is being made ready and first put in place.

At a past presentation of European urban and regional planning awards in Dublin Castle, Ms Virna Bussadori one of Europe's top planners, said that a proper planning process needed to "*connect the present to a shared vision for future development.*"

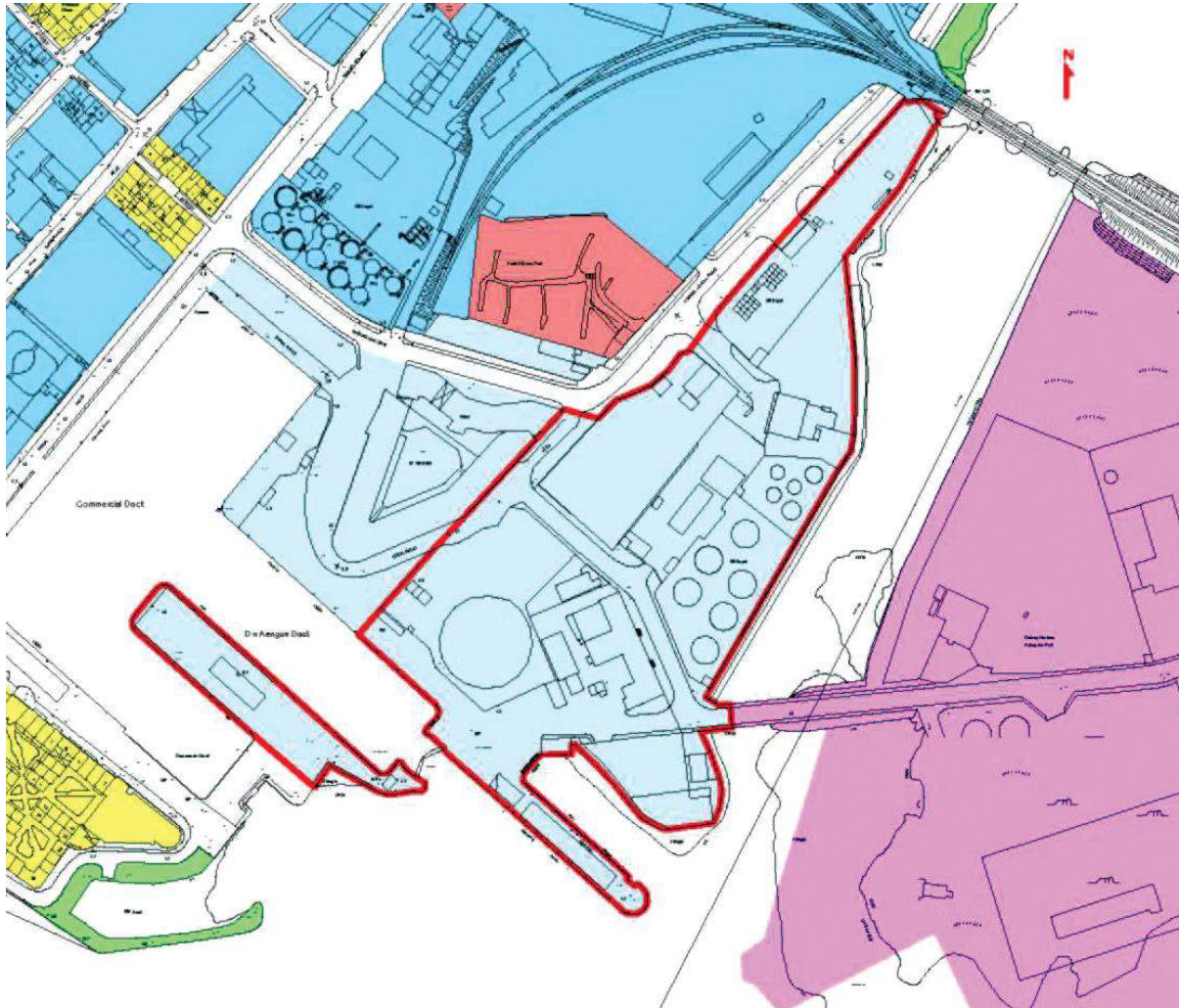
It is noted, that there is little reference made locally to the fact that the docks quay walls are listed as *Protected Structures* in the current City Development Plan. There have been no public discussions held at all about how the character of Galway's docks might best be preserved while at the same time, introducing some exciting new developments into area.

The current Galway City Council Development Plan 2017-2023, and past Development Plans contain reference to the need for a Framework Plan to be prepared – The Department of the Environment Spatial Planning Unit has insisted, as far back as 2008 that a Local Area Plan should be developed for the combined area of Ceannt Station, The Harbour and Eyre Square South before SDZ status is allowed – that there is a need for preparation of an integrated plan for this whole area, of that there can be no doubt!

It is precisely because of the lack of a shared '*Vision Plan*' that any proposed development, would be contrary to that policy, prior to full public debate having taken place first .

Accordingly, there is still a need for a Harbour Area Development Plan: When discussing proposals to develop Galway's Docklands and Ceannt Station areas in September 2007, Galway T.D., Frank Fahey commented that "*there is potential in Galway to develop a waterfront area unequalled in Ireland but in order for the area to reach its true potential it is imperative they develop in unison.*" He went on to say that opportunity would be lost "*if plans to develop Ceannt Station and the docklands are pursued separately, with no long term vision.*"

Those comments reflect the long held view of An Taisce, of which I am a member, which is that there has always been a need for the publication of an agreed ‘Port Development Plan,’ to be authored by the Galway Harbour Company or, preferably an ‘Area Development Plan’ to be developed by Galway City Council, for linking the whole Docks/Ceannt Station area - in concert with both the Harbour Company, CIE & involving all other Stakeholders.



We previously wrote to Mr. Ciaran Hayes Director of Services (in 2006), seeking that Galway City Council would develop its own ‘Masterplan’ for the area. In fact, we called for the holding of a major planning conference to be held in Galway with all stakeholders present, prior to any docks development going ahead. Given the importance being attached to the future development of the station and docks area in Galway; we felt that this was not too much to ask. We were disappointed when we received no acknowledgement to our request!

Meanwhile, Dublin has developed its own *Dublin Dockland Development Plan*, or, Masterplan. It also has a ‘*Dublin Bay Development Plan*’ subtitled ‘*An Integrated Economic, Cultural and Social Vision for Sustainable Development.*’ Cork city has its own *Docklands Project* and a ‘*Cork Docklands Forum*’ to enable their city vision become a reality.

In fact, Cork City Council has been so proactive in acknowledging the importance of properly developing its own *'Docklands Renewal Project'* that it hosted a European Union sponsored conference entitled "*Social Inclusion in Urban Regeneration through Cultural Heritage*" or **SURCH**. June 2007.

The cities of Athens, Kaunas (Lithuania), Nicosia (Cyprus) and Valletta (Malta) were represented and all gave presentations on urban renewal projects they were involved in.

Cork's own presentation at the conference concerned its own proposals to "*Provide a unique opportunity to build a new urban quarter with both employment and housing opportunities with high quality design adjacent to and integrated with the City Centre.*" They even proposed developing a new Light Rail to run back into the city centre!

In Galway, we have been regaled with a mountain of media comment about the development of a company '**Vision**'. But despite the commissioning of a '*High Level*' report some years ago which excluded any community contribution, no contribution or public involvement in consultation has since taken place about Galway not getting its new port.

There have been many similar docks regeneration projects pursued in cities all around Europe. We think of the '*River Clyde Regeneration Project*' in Glasgow where full public participation has been a common feature.

Overall, it is the European experience that is a consistent approach running through all these case studies. Most notably a strong local authority was in charge of each regeneration scheme (for that is what this could be), and was using it not only to improve a run-down area, but also to change the image of the whole inner-city and transform its strategic economic position, using Arts and Culture as a focus for a new community identity and activity.

The proposed extension of Dublin Docks was delayed for years, while the refusal by An Bord Pleanála, for the development of a Container terminal and Multi-purpose Ro Ro berth at Ringaskiddy Deep-water Port & Ferry Terminal was brought about mainly because of *poor transport access*. Problems in Cork that were similar to the problems that will be likely to inhibit future docks development in Galway.

I would like to see the same commitment being given by City Council, as it gave to its application for 'European City of Culture 2020'. There must be in any new Development Plan room for the construction of a Civic Theatre/Art Gallery – School of Music with, potentially room for a Maritime Museum to be placed alongside any new project to develop for social purposes any new building constructed at Galway's Docks.

We are aware that the Courts Service are also currently looking at the potential to develop a new Courts Service building near Ceannt Station, or at a harbourside site.

Most new residents of Galway have no idea of the development of their city occasioned by reason of historic maritime trade through the Port, and, via the development of the Galway - Dublin railway, and from the rail network generally.

The possibilities potentially opening up which could lead to the development and display of our industrial/maritime and social heritage are limitless.

If you we are to consider what is being proposed at Ceannt Station, and at the Harbour - Hi-Quality family housing projects are vitally important elements at these sites, which are at the heart of the city. There are limitless opportunities to be made possible through the Ports Policy Statement, which would see responsibility for the harbours land bank being passed over to the local authority, and by reason of the peoples desire to see our city's built heritage conserved, to become capable of attracting huge numbers of visitors required to generate a new income stream in the city.

The existing emphasis on hosting drinking and partying weekends in the city, is really doing nothing for Galway's image, while a vibrant living Harbour precinct could work for Galway.

The business community will need to become more involved in finding new ways to grow real Cultural tourism in Galway. Some of which would be less damaging to the city's reputation.

This development is especially important now that Galway is set to become the 2020 'European City of Culture'.

Conclusions:

As is agreed by many observers, there is a need to curtail the primacy of Dublin and to curb its relentless sprawl out into adjoining counties in Leinster and beyond. Similarly, Galways continued leakage of housing developments out into the surrounding county where there are no public transport services, or, where there is insufficient and badly organised public transport options. It is unarguable that a higher density of development is in future required in a still growing, Galway city if it is to be raised to a higher 'Tier Two' status!

Living in Galway, if you were not seen to be favourable to the accepted 'Groupthink' which has historically gripped and promoted the idea that 'we need more roads based transport' as a solution and the accompanying development of a Bypass, or, in the building of a Cruise liner terminal out into an environmentally sensitive, heavily protected Inner-Galway Bays SAC. You were seen as odd if you thought of or proposed anything otherwise!

We who are fortunate to live in Galway have witnessed a kind of laziness and delay in thinking through the strategic needs to fully examine new Community based Public Transport alternatives. There has been an enormous lethargy around the need to look at 'New Ways' to transport people, not just vehicles, around and through Galway!

This laziness is probably best explained when one looks at the theory of - **Lock-In:**

The concept of 'Lock-In' explains the extraordinary success of systems such as Microsoft even though they deliver below par services. Lock in happens when a system needs multiple customers before it becomes useful and is more useful the more customers it has.

Telephones were an obvious example. The owner of the first telephone would initially have had no one to call. But the more people who installed phones the more useful that first phone became! Under this *rationale* car manufacturers acquired a critical mass of car owners long before public transport could be upgraded. Media also supports the growth in sales of cars, through advertising. Almost every local radio station puts out car ‘spot’s and car related magazines appear in all newspapers.

This same process happens in the case of competing transportation, systems like roads and rail. The Irish government is supposedly committed to providing both an elaborate motorway system and decent public transport through rail. But the roads are built first. In the face of extensive investment in roadways and an antiquated and inadequate public transport system, individuals will choose to rely on using their own cars.

Housing in Galway has been built around the roads system. Shopping centres and Business parks have been constructed alongside roads with vast car parking facilities. Employment, as in Parkmore, is sited on the assumption that employees will drive their own cars to work.

Businesses have been built up on servicing both cars and the roads system. Powerful lobbies like the Automobile Association, and RAC the Royal Automobile Club, were created. Roads as the predominant form of transportation would by thus be locked in.

It was however heartening to hear recently on national radio the media spokesman for the AA, Conor Faughnan, recommend that the only solution to Galways continuing problems with excess car traffic would be for the construction of Light Rail transit. The worm may indeed be turning!

If in Ireland we continue our present travel patterns, traffic congestion will only increase, there will be a resulting loss in economic competitiveness, our quality of life and the quality of our natural environment will decline. We will not be able to meet our international obligations to reduce our production of greenhouse gas emissions. In short, our travel trends will not be sustainable!

Galways transition to becoming a decarbonised regionally important city where business can be conducted, bearing in mind our need to show clear leadership in mitigating our demands for future growth. Galway really needs to rethink its plans, which are to build yet more damaging roads and should abandon its present plan for a bypass in favour of Light Rail Transit, serviced by providing Park & Ride sites at suitable locations on the periphery as described above.

Finally. The creation of 3 Regional Assemblies will only be successful if they serve to reduce duplication and rid us of local political interference in the planning process. In the past too much deference in listening to parochial interest was entertained, which was demonstrably against the publics best interest!

There is much more that could be said. I will leave it at that.

Though I chair An Taisces – Galway Association and represent members of the Galway City Community Network, in attending Galway City Councils Transport & Planning SPCs. The preceding views are my own personal opinion, and do not reflect Taisce policy which is much more socially informed and environmentally comprehensive.

For any clarification see contact details below:

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