11th March 2016

Re. Draft Galway City Development Plan 2017-2023.

Dear Sir/Madam,

The National Transport Authority (the ‘Authority’) submits the following comments on the draft Galway City Development Plan 2017 - 2023.

Overview

The Authority has had an involvement in the planning of the Galway City Council area since our establishment in 2009, initially through our role on the West Regional Authority Regional Planning Guidelines Implementation Group, and subsequently, and additionally, as the administrative body in charge of the management of the Regional Cities Sustainable Transport Grants Programme for Galway City. At a national level, the Authority also has statutory responsibility for securing the provision of public passenger land transport services which, with respect to Galway City, would relate to the licencing of Bus Éireann and private bus operator routes, within the city and services connecting the city to other locations, in addition to contracting with Irish Rail for the provision of rail services.

More recently, the Authority has been working closely with the Galway Transportation Unit (GTU) and in conjunction with Galway County Council to develop a transport strategy for Galway City and its immediate environs. The working title of this strategy was previously the Galway Integrated Transport Management Programme (ITMP), and it is intended that it will be named the Galway Transport Strategy, once completed.

It is intended that this Transport Strategy, which is nearing completion, will address all modes of transport (public transport, walking, cycling and traffic movement) and will put forward short and longer term proposals for improving transportation in Galway.

In the context of the Development Plan, it is critical that the proposals set out in the Transport Strategy are fully integrated into the policy and objectives of the draft plan. This will ensure that land-use planning and transportation planning are implemented in a coordinated and efficient manner.
Core Strategy (Chapter 1)

The Authority supports the prioritisation of development into locations which facilitate the consolidation of land uses, and supports the potential for trips to be made by walking, cycling or public transport. The Authority welcomes the concept of including strategic public transport proposals in the Core Strategy Map. It is critical however that any transport proposals set out in the development Plan align directly with the networks presented in the Transport Strategy.

In this regard, the Authority believes that the transport elements set out in the Core Strategy Chapter and Core Strategy Map will need to be revised to take account of the Transport Strategy. In particular, the Authority request that the specification of the Rapid Transit Route, Park and Ride sites and Bus Terminal locations are reassessed and revised in the Core Strategy to fully reflect the Transport Strategy proposals.

The Authority notes that the Transport Strategy is referenced in Section 1.4, under the Regional Planning Guidelines West Region (2010 -2022) heading. The Authority suggest that the function and details of the Transport Strategy are clearly established under a separate heading, to ensure that the integration of the two documents is understood, particularly in relation to the strategic role of the Core Strategy in terms of prioritising the longer term development of Galway City in a sustainable manner.

The Authority notes the inclusion of a Business and Technology Park at Ardaun (illustrated in the Core Strategy Map). The quantum or type of development proposed at this location is not clear, however the Authority would have significant concerns over any proposal to locate large scale trip-generating development in the vicinity of strategic national roads. This would be contrary to the "Spatial Planning and National Roads Guidelines for Planning Authorities", (DECLG/DTTaS 2012).

Transportation (Chapter 3)

The Authority welcomes the inclusion of the draft Development Plan’s Aim to integrate sustainable land use and transportation. A number of specific comments in relation to the Transportation Chapter are set out below:

Role of Transport Strategy / N6 Galway City Transport Project (GCTP)

The “Context” sub-section of the “Aim, Context and Strategy” section should set out that the Transport Strategy is intended to address future demand for travel for all transport modes in Galway City and its immediate environs, and may include interventions in the strategic road network in the long-term. In this regard:

- Section 3.6 “Road and Street Network and Accessibility” describes the progress made on the N6 Galway City Transport Project (GCTP) thus far, and states that the project is being advanced in conjunction with the development of the Transport Strategy;
- The Transport Strategy, once finalised, will identify all of the requirements for new road infrastructure, inclusive of the proposals emerging from the N6 GCTP.
Specific References to ITMP (Galway Transport Strategy)
The Authority welcomes the inclusion of Policy 3.2 which sets out the mechanisms by which the integration of sustainable land use and transportation will be best achieved. In relation to the second point within that policy, the Authority recommends that the phrase ‘other measures’ be omitted, because the Transport Strategy is intended to be the strategic framework for investment in transport infrastructure and services as they relate to Galway City.

Section 3.3 “Integrated Transport Management Programme”, accurately represents the key elements of the Transport Strategy. In relation to the overall content set out in Chapter 3 of the draft Plan, the Authority intends that the Transport Strategy, once finalised, will align closely with the transport measures included in the City Development Plan. Therefore, the inclusion of certain measures, statements and specific objectives regarding transport will need to be revised to fully align with the Transport Strategy. The following are among those that are likely to need to be revised:

- References to Rapid Transit Routes;
- Location of potential public transportation hubs;
- Statements and policy seeking to facilitate commuter rail services with stops within the city;
- References to locations for Park and Ride facilities;
- Parking provision in the city centre; and
- Regarding the city’s Public Bike Scheme, the Authority is supportive of its expansion, but would request that references to potential locations (Salthill, NUIG, GMIT) for new bike stations be omitted.

Land Use Zoning Maps
The land use zoning maps include a number of proposed alignments for public transport proposals, namely Bus Priority Measures, Quality Bus Corridor, Public Transportation Corridor and Rapid Transit Routes. The Authority recommends that these alignments are revised to reflect the public transport networks identified in the Transport Strategy. This will ensure consistency between the two plans.

Conclusion
The Authority wishes to acknowledge the close working relationship between the City Council and the NTA in the development of the Transport Strategy. The Authority is willing to assist, as required, to ensure that the policies and proposals of the Transport Strategy are fully, and expeditiously, integrated into the Development Plan.

Yours sincerely,

Michael MacAree
Head of Integrated Strategic Planning.