

Galway Metropolitan Boundary Definition

February 2019

Submission to
the Northern and
Western Regional
Assembly's Draft
RSES



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Prepared for

 **Galway Chamber**
Ag cothú gnó le chéile





Introduction



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Foreword

This report is the independent analysis of Future Analytics Consulting (FAC), Chartered Planning Consultants specialising in Evidence-Led Strategy. Galway Chamber commissioned FAC to analyse the proposed Metropolitan Area Strategic Plan-(MASP) boundary designation for Galway City, as proposed by the Northern and Western Regional Assembly (NWRA) in the Draft Regional Spatial and Economic Strategy for the region.

Galway Chamber remains steadfast in the view that the metropolitan catchment has not been appropriately articulated, and this report by FAC, underpinning the wider submission by Galway Chamber on the overall Draft Strategy, articulates a defensible proposition for a suitably, and sustainably, enlarged MASP area.

We respectfully request that the NWRA considers this report alongside the Galway Chamber submission, and recognises the proper planning and sustainable socio-economic principles in support of a refined MASP area as proposed.

Dave Hickey - President, Galway Chamber



Introduction

This report has been prepared by Future Analytics Consulting Ltd. (FAC) of 23 Fitzwilliam Square (South), Dublin 2 on behalf of Galway Chamber as a submission to the Draft Regional and Spatial Economic Strategy (RSES) developed by the Northern and Western Regional Assembly (NWRA).

Galway Chamber represent approximately 400 companies from throughout Galway City and its hinterland, providing a collective voice for many of Galway's smaller business associations. It is a privately constituted organisation that promote and work for the interests of their member businesses and for the economic development of Galway City and region. The Chamber has an awareness that the continued success and well-being of Galway businesses, regardless of their sector of activity, is inextricably linked to the success of the wider Galway region. Its overarching mission is to: *'Make Galway the leading location for business, investment and people'*.

Galway Chamber would like to commend the Northern and Western Assembly on the publication of the Draft RSES. As the strategy that identifies key assets and opportunities at a regional scale and forms a series of policy objectives based on this, it offers a framework for the management of spatial planning and economic development in the region over a twelve-year period. The Draft RSES acts as the 'follow-up' strategy to the National Planning Framework (NPF) but possesses a more focused regional outlook. In this regard, it must promote and support the same core objectives and policies of the NPF.



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Make Galway the leading location for business, investment and people

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Purpose of this submission

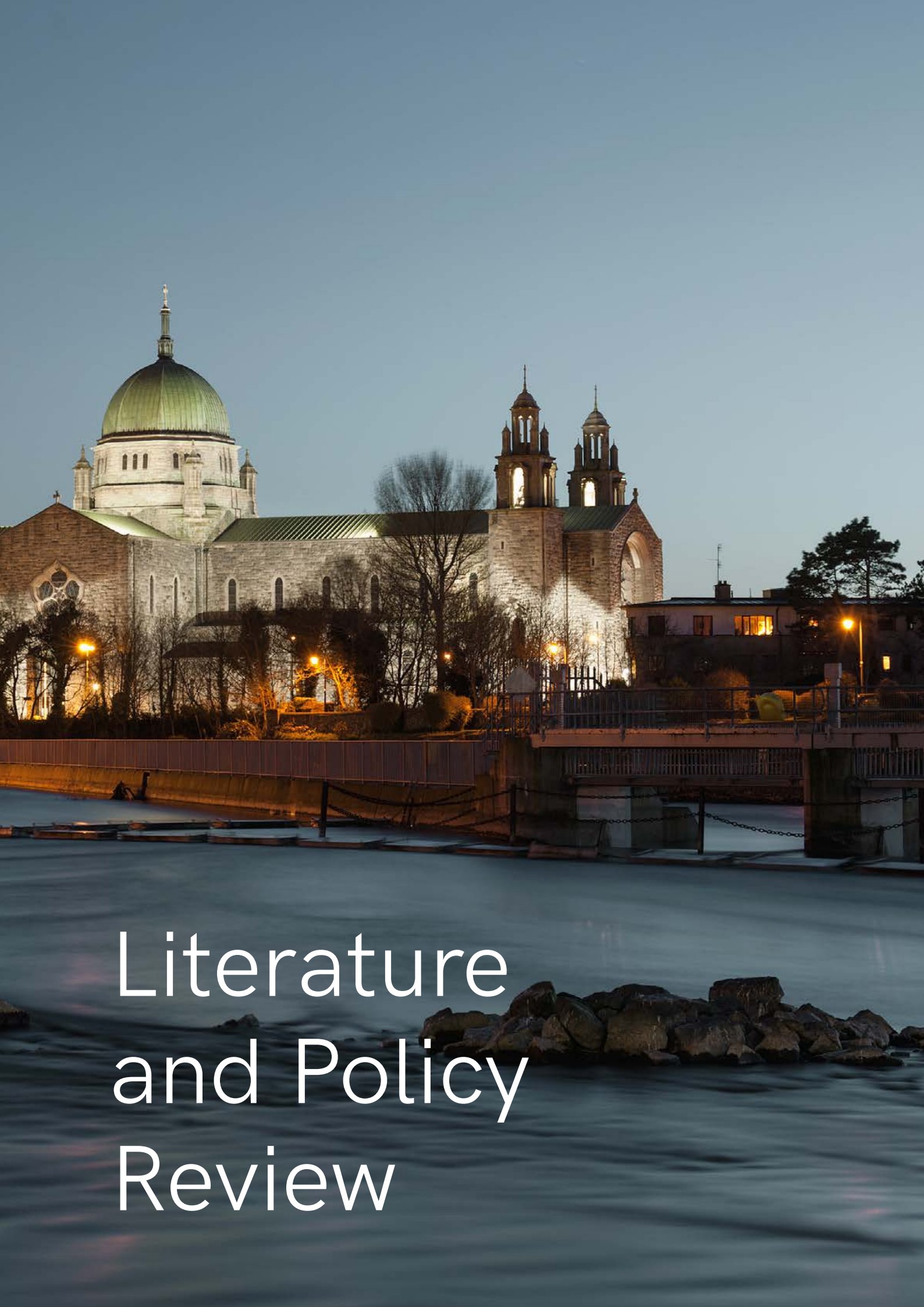
Galway is one of only five cities in Ireland, and as such it received special mention in the NPF as one of the country's key locations for the sustainable economic and spatial growth that is envisaged to occur in the coming decades. The NPF makes provisions for the creation of 'Metropolitan Area Strategic Plans' (MASPs) by the relevant Regional Assemblies, which they subsequently undertook and released as part of the Draft RSEs. Each MASP defines a metropolitan catchment, or boundary, for each city and these catchments form the units of analysis and locations for future growth patterns and infrastructural developments. It is, therefore, imperative that these boundaries are defined in such a way that ensures the entire functional urban area of a city is accounted for and included.

It is the opinion of Galway Chamber that the current iteration of the Galway MASP, as seen in the NWRA's Draft RSES, is too restrictive in terms of its spatial extent. The current boundary of the Galway MASP does not fully account for all of the locations and zones that form component parts of Galway's functional urban area. Equally, the rate of population growth that Galway has experienced in recent decades has long warranted a review of the city's administrative boundary, and the MASP offered an opportunity to contribute towards this. Galway Chamber believes that the functional urban area of Galway City, and in-turn the wider metropolitan area as defined by the MASP, need to be reviewed and redefined to account for those areas that have fallen outside the current boundaries.

This submission will aim to highlight the myriad reasons that a re-evaluation of the MASP boundary is required and will propose alternative definitions for a boundary that capture the real extent of Galway's economic catchment.







Literature and Policy Review

Literature and Policy Review

National Planning Framework

Project Ireland 2040 - National Planning Framework is the Government's blueprint for the sustainable spatial and economic growth of the entire country. It was launched in 2018 and one of its key ambitions is to enable a more dispersed growth by:

'facilitating a shift towards Ireland's regions and cities other than Dublin, while also recognising Dublin's ongoing key role'.

As the quoted text shows, there is an acknowledgment that the continued, unhindered growth of Dublin, at the expense of the rest of the country, is neither acceptable or sustainable and alternative growth patterns must be offered. This is why a rebalancing of growth has been proposed in the NPF, with Ireland's other major cities and urban settlements assuming more prominent roles in the future growth and development of the country.

Galway, as one of Ireland's five cities, is destined to play an important role as a driver of Ireland's economy, if the aims and objectives of the NPF are adhered to. Each city is to target population increases of between 50 to 60% up to 2040 as a part of this new method of economic growth.

Table 1. Projected Growth of Galway City and Suburbs, NPF

	Population 2016	Population Target Growth to 2040	Minimum by 2040
Galway City and Suburbs	80,000	50-60%	120,000

While the NPF is a key, high-level strategic document that provides direction for development, it cannot, due to its national scope, be completely prescriptive and relies on lower-level documents to administer and designate localised objectives. It depends on the Regional Assemblies to undertake the first stage of this task, which is the creation of the 'Regional Spatial and Economic Strategies' (RSES). Furthermore, each of the five cities are to have tailored metropolitan plans created, as part of and in conjunction with the RSES:

'In tandem with and as part of the Regional Spatial and Economic Strategy process, arrangements will be put in place to enable the preparation of five coordinated metropolitan area strategic plans (MASPs) for the Dublin, Cork, Limerick, Galway and Waterford Metropolitan areas.'

The MASPs are afforded statutory underpinning for a 12-year period in-line with the RSESs. They act as strategic planning frameworks for the city metropolitan areas, addressing high-level development issues.

The NPF does **NOT** specify the boundaries for the MASPs, instead stating that this *'issue will be addressed in the context of ongoing Government consideration to establishing an appropriate level of political and administrative leadership for the governance of Ireland's cities'*. However, it does go on to state that until such a time as government decides otherwise, MASPs will be based on the following:

- For Dublin the metropolitan area is that already identified by the NTA's Transport Strategy for Greater Dublin.
- Cork's metropolitan area is that already identified in the Cork Area Strategic Plan.
- Limerick will be based upon 'similar labour market catchment considerations to those utilised for Dublin and Cork and shall include Shannon airport and Town.
- In both Galway and Waterford, the metro areas are again to be based on similar labour market catchments to those used for Dublin and Cork, in consultation with DHPLG and relevant local authorities.

Determining metropolitan boundaries must take account of:

- The functional urban area (FUA) where there is dense concentrations of employment, people and services.
- Commuting patterns based on proportion of resident workers employed
- Geographical features that delineate a 'natural' boundary, such as rivers, mountains, green belts etc.
- Existing NTA boundaries designed for the purposes of transport strategies.

The function of a MASP is to identify the key 'change parameters' of a city (population, employment, housing etc.), prioritise infrastructure development, and deliver compact growth and regeneration.

The NPF outlines a series of key aims that it believes will contribute towards the balanced, sustainable economic and spatial growth of Ireland in the future, they are entitled 'national policy objectives'. The following specifically relate to the MASPs:

National Policy Objective 67:

Provision will be made for Metropolitan Area Strategic Plans to be prepared for the Dublin, Cork, Limerick, Galway and Waterford Metropolitan areas and in the case of Dublin and Cork, to also address the wider city region, by the appropriate authorities in tandem with and as part of the relevant Regional Spatial and Economic Strategies.

National Policy Objective 2a targets 50% of future population and employment growth for the five cities and suburbs, which makes it imperative that the cities have the capacity for the future growth. The MASPs are partly created to allow this to occur. It is stated (NPO 68) that to allow 'phasing-in' up to 20% of the targeted phased population targeted for the city could be accommodated in the wider metropolitan area.

National Policy Objective 68

A Metropolitan Area Strategic Plan may enable up to 20% of the phased population growth targeted in the principal city and suburban area, to be accommodated in the wider metropolitan area i.e. outside the city and suburbs or contiguous zoned area, in addition to growth identified for the Metropolitan area. This will be subject to: any relocated growth being in the form of compact development, such as infill or a sustainable urban extension; any relocated growth being served by high capacity public transport and/or related to significant employment provision; and National Policy Objective 9, as set out in Chapter 4.

There are several 'growth enablers' for Galway listed in the NPF, which it is claimed will be key for its future growth. Those of relevance to this submission include:

- Progressing the sustainable development of new greenfield areas for housing and the development of supporting public transport and infrastructure, such as at Ardaun;
- Improving access and sustainable transport links to, and integration with, the existing employment areas to the east of the City at Parkmore, Ballybrit and Mervue;
- Determining the sustainable future development of the Galway Airport site for employment and/or residential use together with supporting facilities and infrastructure;
- Provision of a Citywide public transport network, with enhanced accessibility between existing and proposed residential areas and the City Centre, third level institutions and the employment areas to the east of the city.



Draft Regional Spatial and Economic Strategies

Three Regional Assemblies were formed upon the adoption of the Local Government Reform Act of 2014: The Eastern and Midlands; Northern and Western; and, Southern Assemblies. Each Assembly assumed multiple functions, with the most important being their role in the preparation and publication of a Regional Spatial and Economic Strategy (RSES) for their respective administrative zones. Each RSES seeks to provide a long-term strategic and economic framework for the growth and development of their regions. Importantly, the RSES' should support and build upon the stated aims and objectives of the National Planning Framework, effectively acting as the tool for delivery at a regional scale. Currently, the Draft versions of all three strategies are at public consultation phase.

As per the objectives of the NPF, it is the responsibility of the Regional Assemblies to create regional level strategies that identify the metropolitan boundaries of their cities, and key Regional Centres. The Metropolitan Area Strategic Plans (MASPs) form a 12-year strategic plan for each metro region, identifying key locations of employment and future growth, along with vital infrastructure. The Northern and Western Regional Assembly are responsible for the creation of a MASP for Galway, and as such its RSES will be the focus of attention, unless otherwise stated.

By 2040 the Northern and Western region is set to have an additional 180,000 people living within it, which will necessitate the creation of an additional 115,000 jobs. Galway County is expected to grow to between 300,000 and 308,500 by 2026, and to between 322,000 and 334,500 by 2031. This requires the appropriate measures and mechanisms to be put in place that will facilitate and accommodate the extra numbers.

Table 2. Galway County Growth Targets, NWRA

Galway Population Targets					
	2016	2026	Increase on 2016	2031	Increase on 2016
Lower Range	258,000	300,000	42,000	322,000	64,000
Higher Range	258,000	308,500	50,500	334,500	76,500

The NWRA, with some input from Galway City and County Councils, prepared a Metropolitan Area Strategic Plan (MASP) for Galway, as per the obligations of the NPF. It is stated in the RSES that **"Galway needs to accommodate a greater proportion of the growth it generates within its metropolitan boundaries"**. As such, population growth targets are established for Galway City that acknowledge the NPF's target growth rate of between 50-60% for the cities and assigns a 55% growth rate to Galway. Table 3 below provides an overview of the RSES targets, up to the year 2040.

Table 3. Galway City Population Growth to 2040, NPF & NWRA

Galway City	2016 Population	Increase to 2026	Increase to 2031	Increase to 2040
	79,900	18,050	27,300	44,000

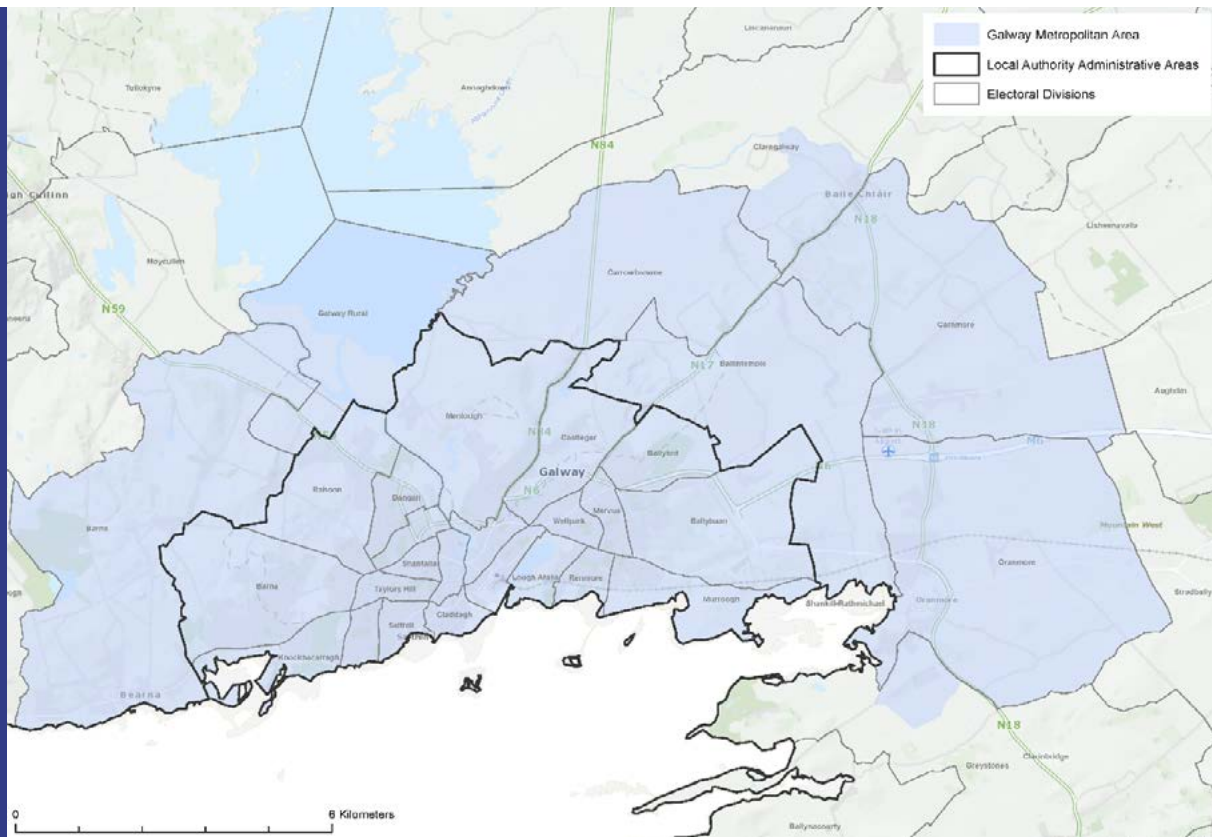


Figure 1. Galway MASP

The importance of Galway, at a regional level, is consistently stated throughout the Draft RSES, with particular mention given to its internationally recognised clusters of medical device and ICT companies. Nine of the top ten MedTech companies and five of the top ten ICT companies have a base in Galway, and its growing industrial sector is supported and complemented by the two third level institutions that call Galway home. The RSES identifies a 'metropolitan' boundary for Galway, which is then used as the basis of all subsequent analysis. There is no definition or rationale provided for the the selection of this boundary found within the RSES. Instead, direction from the DHPLG is alluded to within the strategy. Figure 1 is taken from the RSES and highlights the extent of the Galway metropolitan area.

Two key targets are established for the Galway MASP:

- Population of the MASP is to grow by 25,000 to 2026 and by 38,300 to 2031 with the population of Galway City and Suburbs accommodating 19,200 to 2026 and 28,000 to 2031.
- Deliver at least half (50%) of all new homes that are targeted within the MASP to be within the existing built-up footprint.

The MASP sets out the locations for future industrial development, population growth and regeneration opportunities. It does so for commercial, industrial and residential lands as a means of identifying future areas of growth.

It calls for the consolidation of existing neighbourhoods at Knocknacarra, Ragoon, Castlegar and Roscam, which combined have the potential to provide for 170 hectares of residential zoned land, which could offer the capacity to integrate new residents into existing neighbourhoods. Whereas lands at the Ceannt Staion Quarter, Inner Harbour and Headford Road are deemed to present opportunities for large-scale regeneration that could create new residential communities in a mixed-use setting.

Ardaun is noted as having the potential to accommodate up to 25% of the residential growth for the city, due to its highly accessible location and proximity to key employment areas such as Parkmore, Ballybrit, Mervue, and strategic IDA sites at Oranmore and Athenry. It also receives special mention in the NPF as a key strategic site for the future development of Galway. There is currently an existing LAP for the Ardaun area which is detailed in a later section.

Table 4 provides a summary of the locations and capacities for future residential growth, as indicated in the Draft RSES.

Table 4. Available Residential Land Zonings, NWRA

Locations	Approximate Land Area
City Residential Zoned Lands	172 ha
Regeneration Lands	10 ha
Ardaun LAP Phase 1	49 ha
Ardaun LAP Phase 2	61 ha
Murrough LAP	11 ha
Eyre Square East Quarter	2 ha
Baile Chláir	31 ha
Bearna	8 ha
Oranmore	31 ha
Total	c. 375 ha

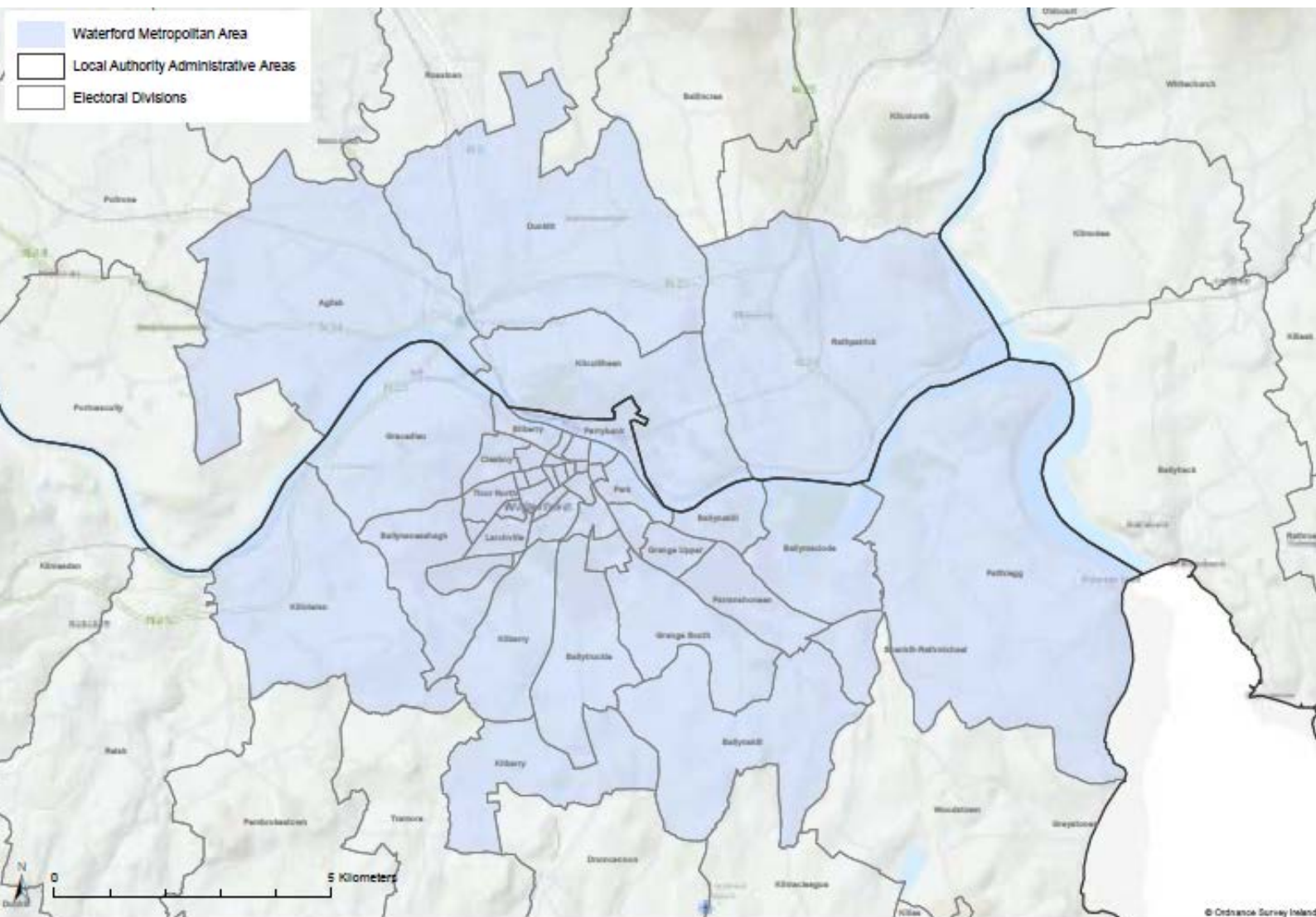


Figure 4. Waterford Metropolitan Boundary, SRA

The third city that is part of the SRA is Waterford which has also had a MASP boundary created, and once again it is stated that the definition has been derived from the DHPLG and their 'Implementation Roadmap for the National Planning Framework'. The Waterford MASP extends into County Kilkenny, which just like the Limerick MASP, means there is a need for collaboration between different local authorities. Waterford MASP's population is listed as 59,854 in the RSES, with a total combined area of approximately 143sq.km. A minimum population target for Waterford City and Suburbs is set at 81,000 to 2040.

Policy Reports, Circulars, Submissions and Reviews

This section will outline and reference some of the key documents that have been released to the public which have relevance to either the 'metropolitan region' concept or have a direct link to the Galway metropolitan area. Documents included cover National Government Circular Reports, submissions to the NPF, Transport strategies, Regional analysis reports, International standards documents, and independent committee reviews. The purpose of this sub-section is to offer a literature review, of sorts, that will inform later sections and provide a basis from which a critique will be developed.

Department of Housing Planning and Local Government - Implementation Roadmap for the National Planning Framework.

This release was made by the DHPLG as a means of clarifying outstanding queries relating to the NPF and addresses items such as its legal standing, implementation, the definition of the RSES' functions and more. Particularly relevant is the explanatory sections on the metropolitan areas.

The importance of city-regions as a driver of economic growth is acknowledged as are the commitments made in the NPF to strengthen local democracy. These are the fundamental reasons behind the creation of the MASPs. The MASPs are considered to be *'the appropriate vehicle to address the area that most directly supports the core city area'*.

Maps for each of the five metro areas are provided in the appendix to the document and are based *'primarily'* on ED boundaries, which enables demographic analysis. Defining the boundary extents for the metropolitan zones should:

'primarily comprise the cities and their immediately adjoining suburbs, as well as adjacent and surrounding areas characterised by their development density, proximity to, and level of integration with the primary urban centre'.

The roadmap continues to outline the rationale behind the designation of the boundaries, stating that the pre-defined Dublin and Cork metro areas provided a benchmark for creating the remaining three metro areas. Limerick, Galway and Waterford had their respective metro areas defined *'using a methodology that was developed having regard to similar considerations to those for Dublin and Cork, as well as key Census data'*.

The general contents of each MASP should contain the following:

- An ambitious but realistic City Vision that is derived from the city's purpose and scope of influence, its national and international visibility as well as providing clarity for its future growth, competitiveness agenda and development.
- The identification of a limited and targeted number of Strategic Growth Areas, taking into account their potential and deliverability, the capacity and proximity of such areas and setting out the location, broad development type and quantum applicable.
- Growth areas should include; zones for employment; areas that increase national and international connectivity for the city; regeneration sites; and improvements to the public amenities and infrastructure

Appendix 3 identifies the metro area populations and land size for 2016 and shown in Table 5.

Table 5. Metropolitan Area Populations and Land Area, Various Assemblies

Location	Population	Area (sq. km)	Density person/sq. km
Dublin City/Councils	1,275,912	670.46	1,903
Mid-East Councils	123,613	264	468
Dublin Metro	1,399,525	934	1,498
Galway City	78,668	49.29	1,596
Galway County	15,407	101.85	151
Galway Metro	94,075	151	622
Cork City	125,657	37.8	3,323
Cork County	178,512	784.61	228
Cork Metro	304,169	822	370
Limerick City and County	104,952	214.2	490
Clare County	27,468	172.7	159
Limerick Metro	132,420	387	342
Waterford City and County	51,615	85.05	607
Kilkenny County	8,239	57.6	143
Waterford Metro	59,854	143	420

Department of Housing, Planning and Local Government Circular to Regional Assemblies – Metropolitan Strategic Area Plans (MASP) boundaries.

This circular report identifies a series of principles for defining those metropolitan areas that have not already been defined, such as Dublin and Cork. It references analysis undertaken on behalf of the Southern Assembly in the report, and uses this analysis, as well as the pre-defined parameters for metro areas established for Cork and Dublin to develop a methodology for use on Limerick, Galway and Waterford. The Circular forms a supplementary component of the Implementation Framework, outlined previously. The following key directions were prescribed in the report:

- Electoral divisions where **at least 60% of the labour force works** in the principle urban area should generally be included in metropolitan areas.
- Electoral divisions where less than 60% of the labour force works in the principal urban area may also be included within the metropolitan area.
- As a control, it should be targeted that the **population of the principal urban area** comprises at least three-quarters, or **75% of the population of the overall Metropolitan** area and in any event, that the principal urban area must comprise not less than two-thirds, or 66% of the population of the overall Metropolitan area.

It is stressed, within this circular, that a proposed definition of a metropolitan area that is based on a 40% catchment would be too extensive and result in the inclusion of too many rural areas. It calls for the review of Metropolitan areas that have undertaken this analysis.

Prospects for Irish Regions and Counties: Scenarios and Implications. Economic and Social Research Institute, Research Series, 2018.

This comprehensive report is the culmination of a detailed statistical analysis and series of projections performed by the Economic Social Research Institute (ESRI) on behalf of the Irish Government. It is the analysis which informed the development of the NPF. The report provides a summation of the current socioeconomic landscape in Ireland and compares the composition of our urban settlements unfavourably to our European neighbours. Dublin dominates Ireland in terms of its sheer size, in population terms. The next largest city, Cork, is significantly smaller, as are Limerick, Galway and Waterford. By international standards, our major settlements outside of the primary city (Dublin) are too small. Current theory suggests that a national economy, and regional economies, perform better if the second city is half the size of the primary city, the third city is a third the size of the primary city and so on. In effect, this report calls for the growth and development of our cities as a counterweight to Dublin and emphasises the benefits larger, stronger cities, such as Galway, would have on both the national and regional economies.

When discussing the consequences of the projected population increase, the report states that an increase of 500,000 households is an implication of this. It continues to state that this increase will predominantly occur in Dublin, the Mid-East, Cork and Galway "which are areas that have already been identified as having housing shortages" and goes on to state that increased levels of construction are required. Similarly, when discussing migration, specifically of international migrants to Ireland, the report indicates that Galway is the third most popular destination for international migrants, behind only Dublin and Cork. It far surpasses Limerick and Waterford in this regard. Table 6 provides a summary of the population projections and growth rates for the West region (of which Galway is a part), the South-East (for comparison purposes) the NWRA and the State as a whole.

Table 6. Selected Regional Projections to 2040, ESRI

Area	Population by the Thousands		Average Growth per Year (%)	Population Share (%)	
	2016	2040		% 2016	% 2040
West	453.1	534.1	0.7	9.5	9.5
South-East	510.3	585.4	0.6	10.7	10.4
NWRA	847.4	961.6	0.6	17.8	17.1
State	4,761.9	5,634.8	0.8	100	100

OECD (2013). Definition of Functional Urban Areas (FUA) for the OECD metropolitan database.

This OECD report attempts to define functional urban areas (FUA) of metropolitan zones as this would allow comparison internationally. With varying definitions of metropolitan areas and different units of measurement used across the globe, it is important to have standard definitions. Definitions of urban areas in OECD countries use population density to identify urban cores and travel to work flows to identify the hinterlands. It is a three-step process:

1. Identification of core municipalities through gridded population data.
2. Connecting non-contiguous cores belonging to the same functional area
3. Identification of the urban hinterlands

The first step analyses population densities through studying 1-kilometre squared grids or pixels (in the case of the OECD) to determine core areas. This is followed by the designation of those areas that, although not directly connected through continuous levels of population density, are still part of the core. Areas such as business parks or commuter towns are examples of such. This ensures that the actual functioning economic area can be determined and used to create a FUA, and subsequently metropolitan area. The final step takes the newly defined FUA or metropolitan area and determines the wider hinterland. The OECD define urban hinterlands as *'all municipalities with at least 15% of their employed residents working in a certain urban core'*. Therefore, the hinterland must have a minimum of 15% of the working population work in the urban core, or metropolitan zone.

One criticism of the OECD definition, which it itself acknowledges, is that the parameters used are more suited to the larger nation states within the OECD. Meaning smaller nations, such as Ireland, will fail to meet many of the standards set out in the OECD methodology. Therefore, more suitable parameters are required to be considered suitable for the context within which they are used.

Western Development Commission: Travel to Work and Labour Catchments in the Western Region.

The Western Development Commission (WDC) is a group that aims to promote the economic and social development of the western region, which includes counties Donegal, Sligo, Leitrim, Roscommon, Mayo, Galway and Clare. They regularly release research papers and economic analysis reports that relate to this region, with the Travel to Work and Labour Catchments report being a recent example. This report utilises the CSO's 'Place of Work Census of Anonymised Records' (POWSCAR) dataset to understand the commuter flows and geographical reach of the main urban settlements.

For their entire region it was found that there were 260,261 people who lived in the region and were at work. The Galway City labour catchment was easily the largest and had 70,170 people living in its catchment and at work (with 55% of this total employed in Galway City). This is approximately 27% of the total Western Region's labour catchment, highlighting the importance of the Galway labour catchment area. Combined, the settlements of Sligo, Ennis, Letterkenny and Castlebar account for approximately 30% of the total. Galway City's labour catchment, as provided in the WDC report, is showcased in Figure 5.

In terms of the locations of work for the 70,170 persons found within the Galway City catchment, unsurprisingly the vast majority work in Galway City (55%). It is interesting to note that both Tuam (1,285) and Athenry (1,248) each record 1.8% of the total Galway City labour catchment as working in their towns. This would indicate the dynamic regional economy that exists surrounding Galway City. The total number of jobs located within Galway City and suburbs was 44,376, 18.3% of all jobs in the region. This represents an almost similar total to

Limerick City, approximately half of that in Cork City and roughly 9% of Dublin's total. While this figure is still substantial, the report does highlight how the jobs recorded are those that are within the city boundary and does not account for business parks outside of this.

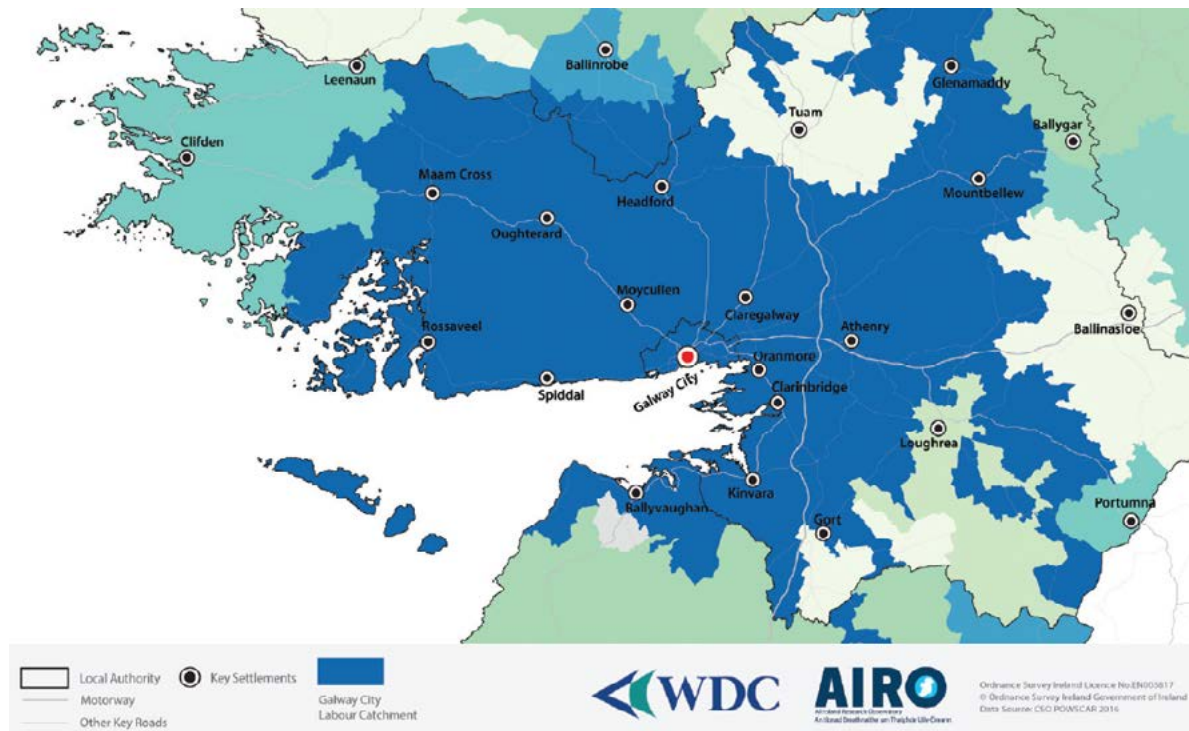


Figure 5. Galway City Labour Catchment, WDC

Understanding the relative proportion of persons that travel to Galway for work is an important part of this report and Figure 6 shows just that. It takes electoral divisions (EDs) as the unit of analysis and analyses the proportion of people that travel to Galway City for work from each ED. The dark blue areas are located in and immediately adjacent to Galway City's boundary and show those EDs where 60% of greater workers work in Galway City. The next zone, which is a lighter blue, represents those EDs where between 45-60% of workers commute to Galway. This zone of influence extends almost as far as Oughterard, Headford, Tuam and Athenry, while encompassing Oranmore.

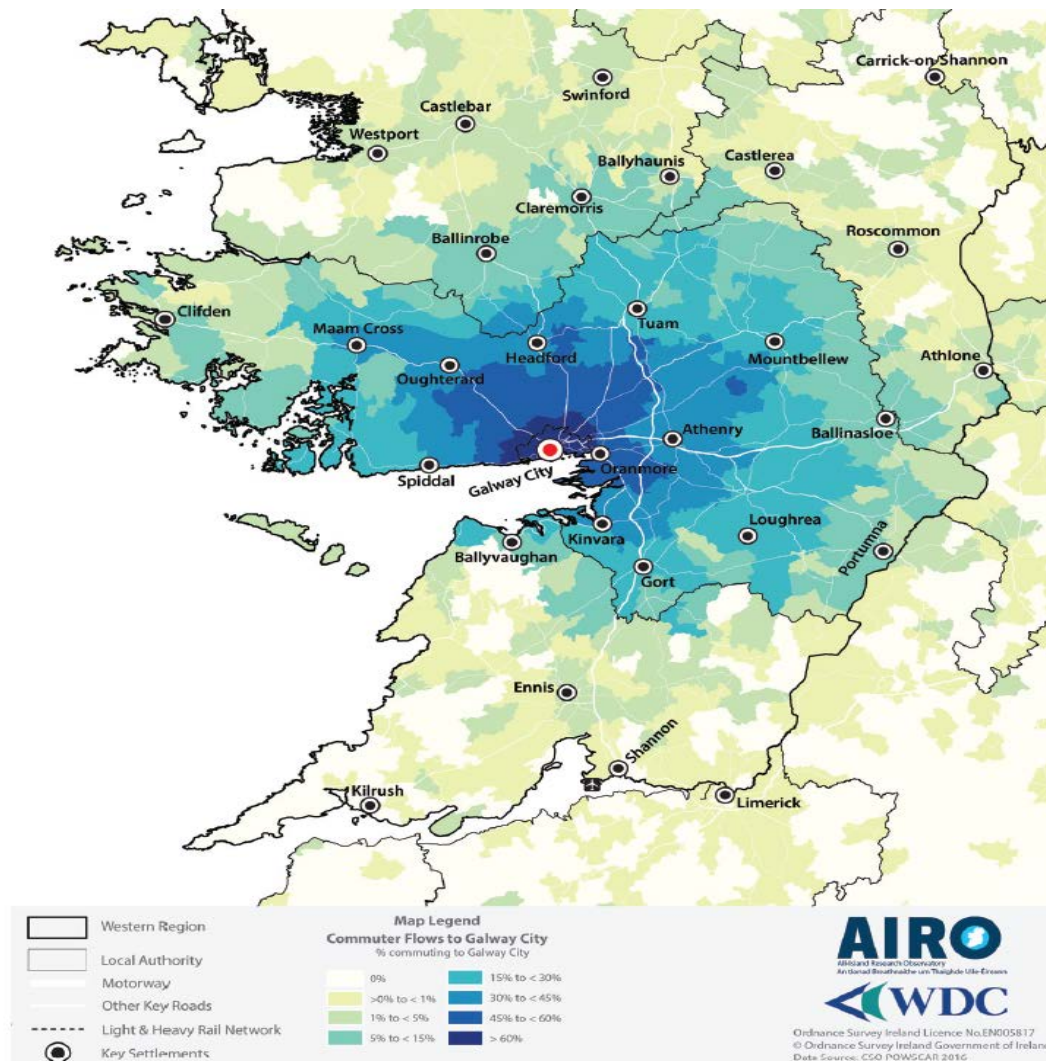


Figure 6. Proportion of Commuters to Galway from Surrounding EDs, WDC

Local Government Arrangements in Galway: The Report of the Galway Local Government Committee (2015)

This report summarised the findings of the independent committee tasked with carrying out a review into Galway's local government arrangements, as per the direction of the Minister for Environment, Community and Local Government. The two core questions that the committee sought to answer were:

- If the Galway City boundary should be altered, and if so, what form would the new arrangement take;
- If Galway City and County Councils should be unified.

After an extensive consultation phase the committee determined there were four key options to be assessed: No change; a boundary extension for Galway City; radical shared services; or, a full merger. Consideration of the most appropriate option required an understanding of which one would be most likely 'to lead to an enhanced place-shaping role for Galway City and County over the next twenty to thirty years'. The report states that there is a recognition that 'many of the existing local authority functions require them to take an increasingly **regional** or sub-regional perspective on issues'.

The committee acknowledged that current service provisions by each local authority were of a good standard and had contributed to the relative success of Galway when compared to other counties and cities. While this pointed towards 'no change' the committee determined that services could be optimised with a better configuration.

Adjusting the City boundary to take in locations such as Parkmore would be of benefit to the City Council, but to the detriment of the County, and while conditions could be put in place to reimburse the County, it was considered an inadequate solution.

The committee recommended the establishment of a unified local authority to be known as the Greater Galway Authority (GGA). This would 'maximise the potential of the region to maintain, secure and grow a sustainable economic base into the future'.

Several recommendations were made that facilitated the realisation of this new structure, but the most pertinent for the purposes of this submission is the final recommendation, titled: 'Strong metropolitan area - driving economic growth'. It states that when establishing a new authority it is still imperative that 'due recognition to a distinct City area' is afforded.

Pros for the amalgamation included the rationale that a larger authority would:

- Be better placed to deal coherently with regional and national bodies such as the NRA, IDA, EPA, and Irish Water, and with potential FDI.
- Create a council of sufficient scale to provide a credible counter-weight to the Greater Dublin area and to drive the development of the Galway Gateway and Atlantic Enterprise Corridor.
- Would be more successful in tackling problems that affect both the city and the county, such as economic development, tourism, traffic congestion and high levels of car dependency.

Cons against the amalgamation of the councils included reasons such as:

- The city not having independent, direct control over its budget, or more generally the degree of autonomy a city of Galway's importance should have.
- The priorities of, and challenges facing, the city and county are different. The county focus is predominantly on issues of a rural nature. The city focus is predominantly on urban issues.
- The area would be seen as too large for a single local authority.

Galway County Council Submission to the Draft NPF (2017)

In their submission to the Draft NPF consultation phase, Galway County Council put forward a case for a 'Galway Region' to receive special designation as an essential counterweight to the Dublin Region. It promoted the importance and centrality of the Galway region, at the heart of the Atlantic Economic Corridor (AEC) and with good connections east to Dublin. Perhaps of most relevance to the aims of this submission is the coverage afforded to the 'Galway Transportation and Planning Study', and in particular, its boundary. It offers an interesting case study as its reach extends beyond Tuam to the north, Athenry to the east, Loughrea and Gort to the south, while also extending as far west as Carraroe. This boundary, which was proposed as the required extent to sufficiently develop a detailed transportation and planning strategy, highlights the area that is influenced by Galway City. Figure 7 show the extent of the 'economic engine' that exists in the Galway region, with clear north-south and east-west corridors. The latter forms part of the wider Dublin-Galway Strategic Economic Corridor.

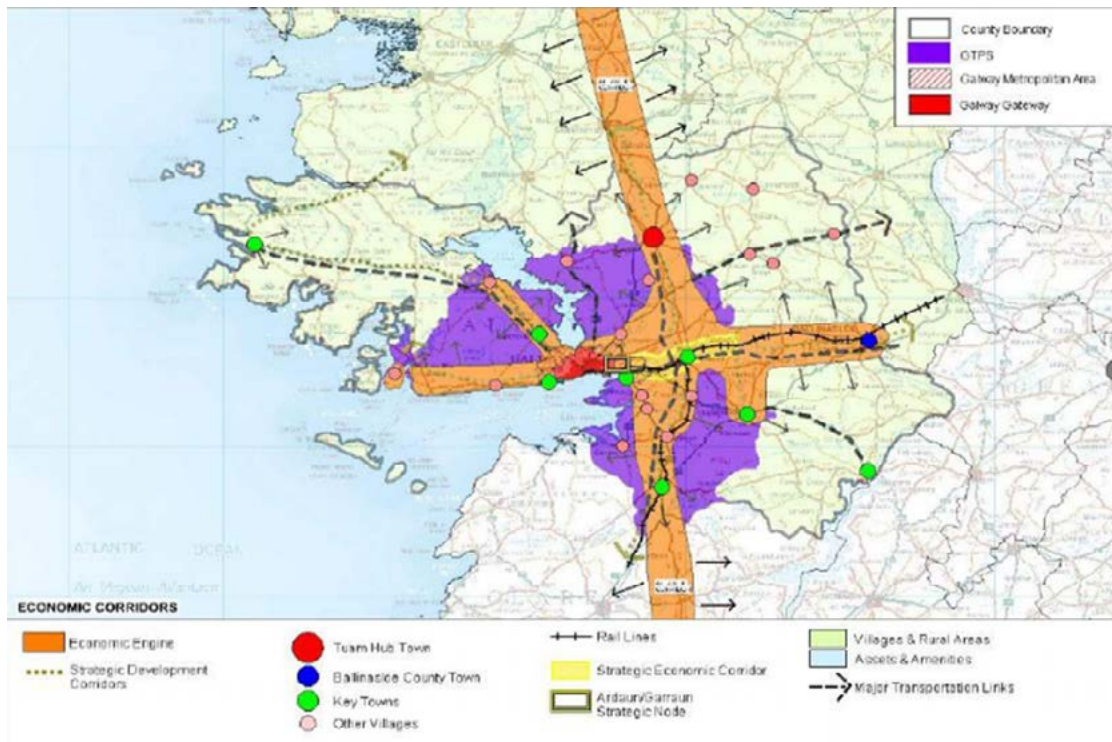


Figure 7. The Economic Engine of the Galway Region, GTPS

Galway Public Transport Feasibility Study (2010)

A feasibility study into the delivery of a new public transport network in Galway was undertaken by MVA Consultancy in 2010. This study built upon previous transportation studies, such as the aforementioned Galway Transportation and Planning Study (GTPS) and used the same study area which is shown in Figure 8. Essentially, it sought to determine the current condition of the transportation system in Galway and make proposals as to how the public transport offerings could be revamped and improved to meet the needs of a growing city and region.

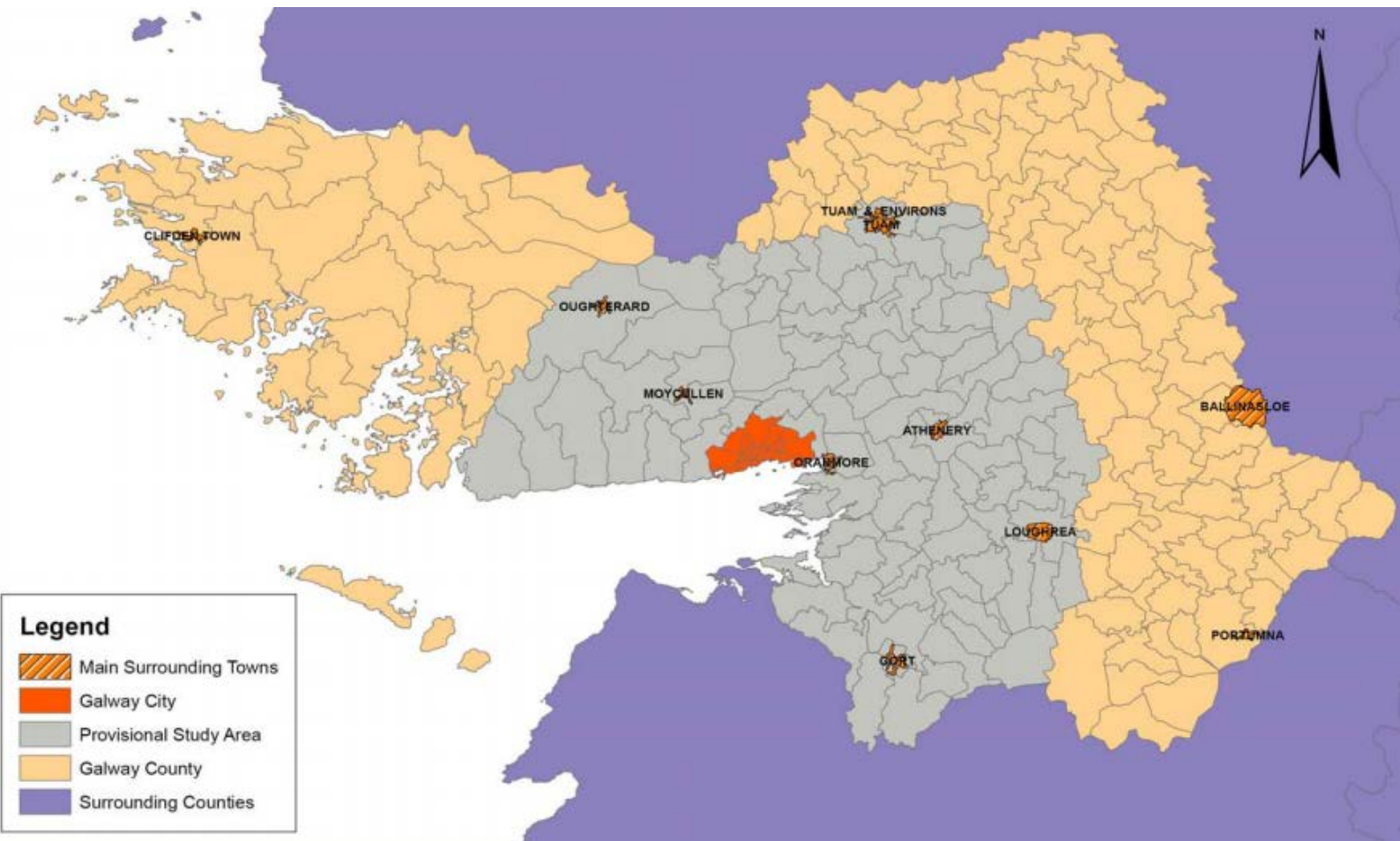


Figure 8. Galway Transportation Study Area, MVA Consultancy

Unsurprisingly, private car usage dominated transport in the Galway region, and was increasing. This will inevitably lead to further congestion and negatively impact Galway's economic growth as well as its long-term sustainability. As would be expected, public transport usage was higher in the city core, with the vast majority of commuters using private cars in the wider GTPS zone.

In order to determine the most travelled to destinations and their origins a POWSCAR analysis was undertaken and 'desire line' maps were created to highlight the main locations, reproduced in Figure 9. The intention of such a study is to see what locations are the most popular, thus allowing the potential creation of new public transport routes to service these locations. Interestingly, the study found that locations such as Athenry, Loughrea and Tuam all had between 101 to 200 unique car trips per day made into Galway City for work purposes. These locations were among the most popular and most travelled. It provides an indication of the economic reach that the city possesses.

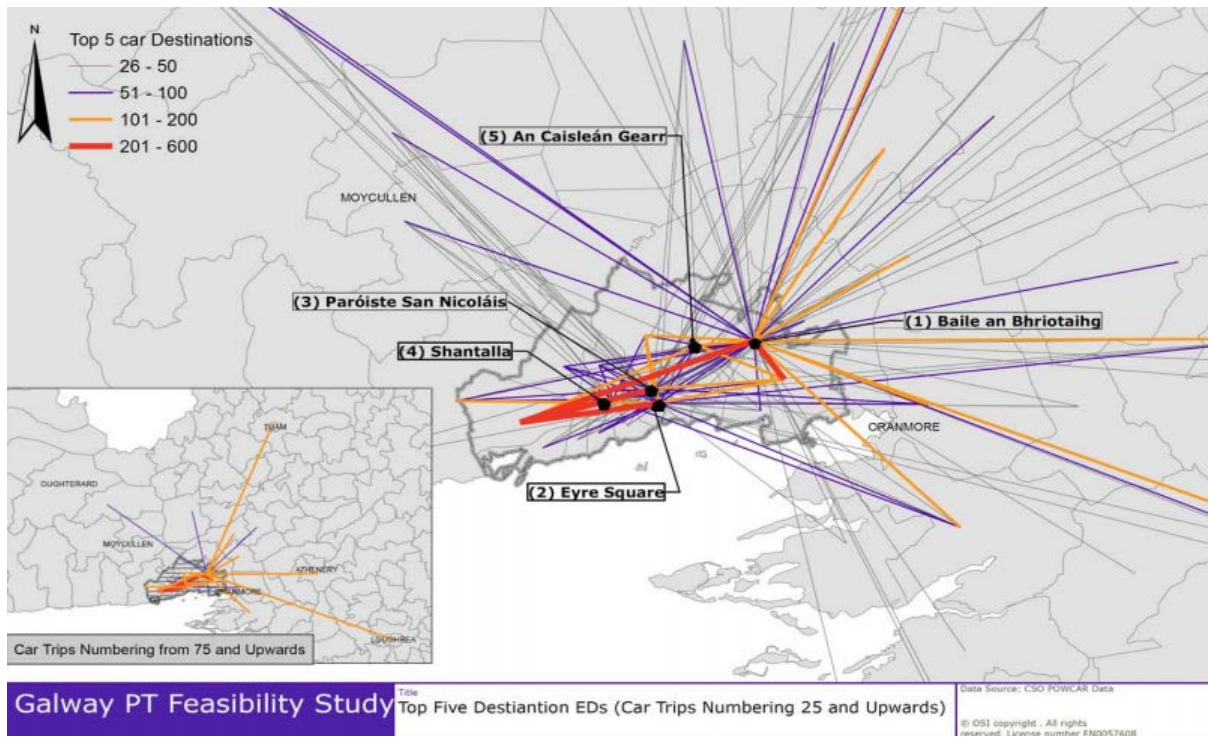


Figure 9. Private Car Commuter 'Desire Lines', MVA Consultancy







Analysis and Contradictions

Analysis and Contradictions

A Discussion on the National Planning Framework

It is the core objective of the NPF to facilitate *'a shift towards Ireland's regions and cities other than Dublin, while also recognising Dublin's ongoing key role'*. This requires a concerted effort on behalf of national, regional and local authorities to ensure that each of the remaining four cities receive the appropriate supports and provisions allowing them to prosper and provide a genuine alternative to Dublin.

The NPF's call for a rebalancing of growth leads to its call for each of the regional assemblies to develop and deliver metropolitan area strategic plans (MASPs) for the cities within their boundaries. It could be argued that there is a failure on behalf of Government to provide adequate direction on the creation of the MASPs. The NPF afforded Government an opportunity to specify the extents of, and provide supports for, the new metro regions outside Dublin and Cork. Instead, the NPF designates the newly formed Regional Assemblies to oversee MASP creation. It states that Limerick, Galway and Waterford should be based on similar labour market catchments to those used for Dublin and Cork. It also requires the determining of the metropolitan boundaries to take account of: the functional urban areas of the cities; commuting patterns; geographical features that would delineate a natural boundary; and, existing NTA transport strategy boundaries.

It is worthwhile exploring some of these parameters set by the NPF in more detail as it would allow an understanding of how one might come to define a metropolitan zone for Galway. In order to provide a further rationale as to why a boundary extension to the current MASP is both required and necessary, FAC have undertaken an analysis of a range of publicly available datasets. In particular, the concept of a 'functional urban area', one of the NPF's key parameters, will be interrogated, starting with population distribution. The location and movement of people is a fundamental part of any analysis that seeks to identify zones of influence or functional urban areas. One of the more basic measures of a successful region is the rate of population increase. A prosperous and dynamic region is one that undergoes population increases over time.

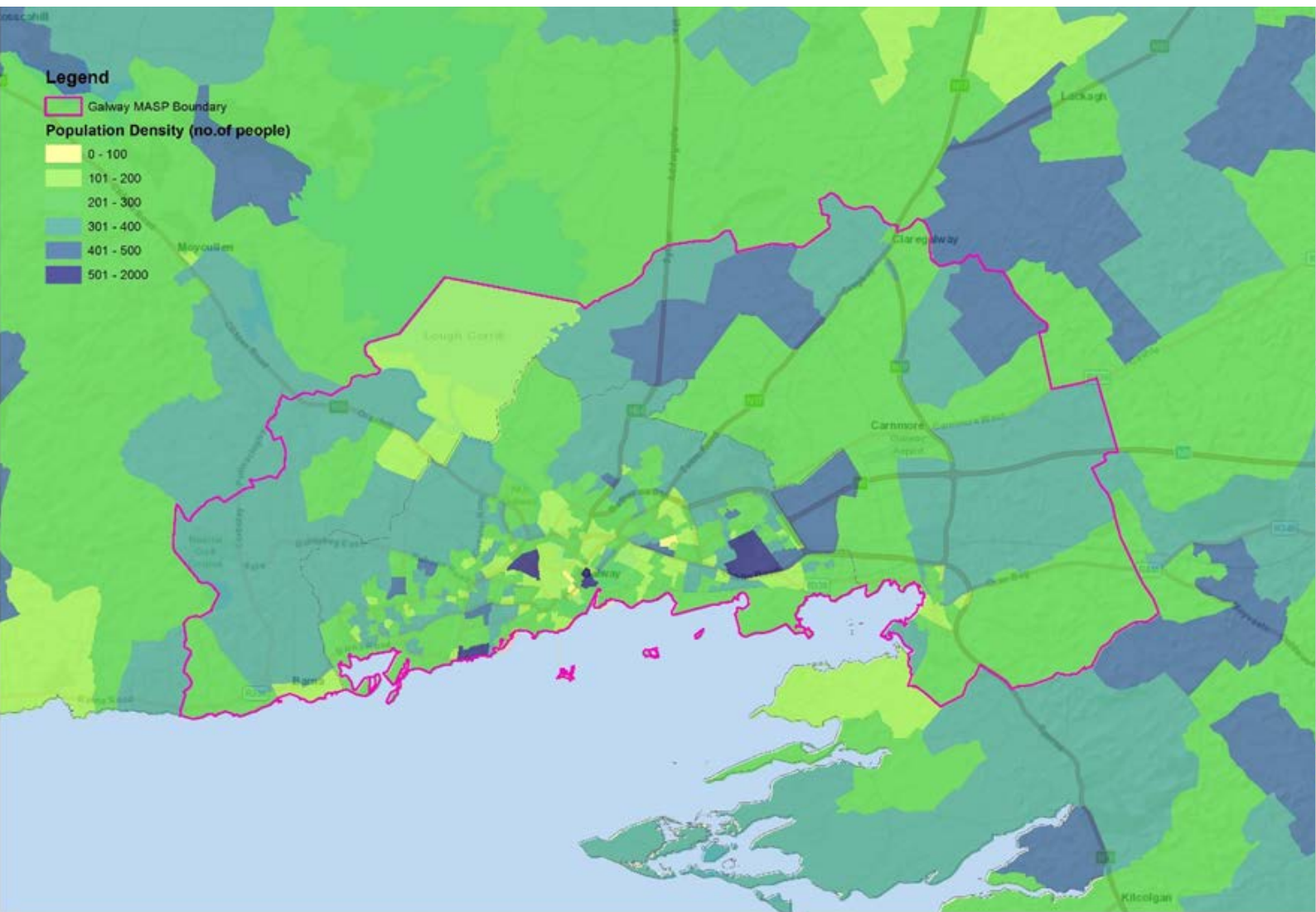


Figure 11. Population Density per SA, CSO

As a continuation of the density study, the scope was broadened, and the parameters changed to provide an indication of density per square kilometre. Figure 12 again uses SA as the unit of analysis, however it colour-codes them based on density per square kilometre, unlike Figure 11 which utilises the total count method. From this image the true extent of the populated areas can be seen, with a dense core situated in Galway city and extending outwards, with areas of higher concentrations located along the key transport routes. While it is no surprise that settlements possess denser populations, the image does suggest that Galway's FUA extends beyond the MASP boundary, which is also reproduced on this map. A strong argument could be made that locations such as Moycullen, Athenry and Kilcolgan are worthy of inclusion within a Galway MASP boundary.

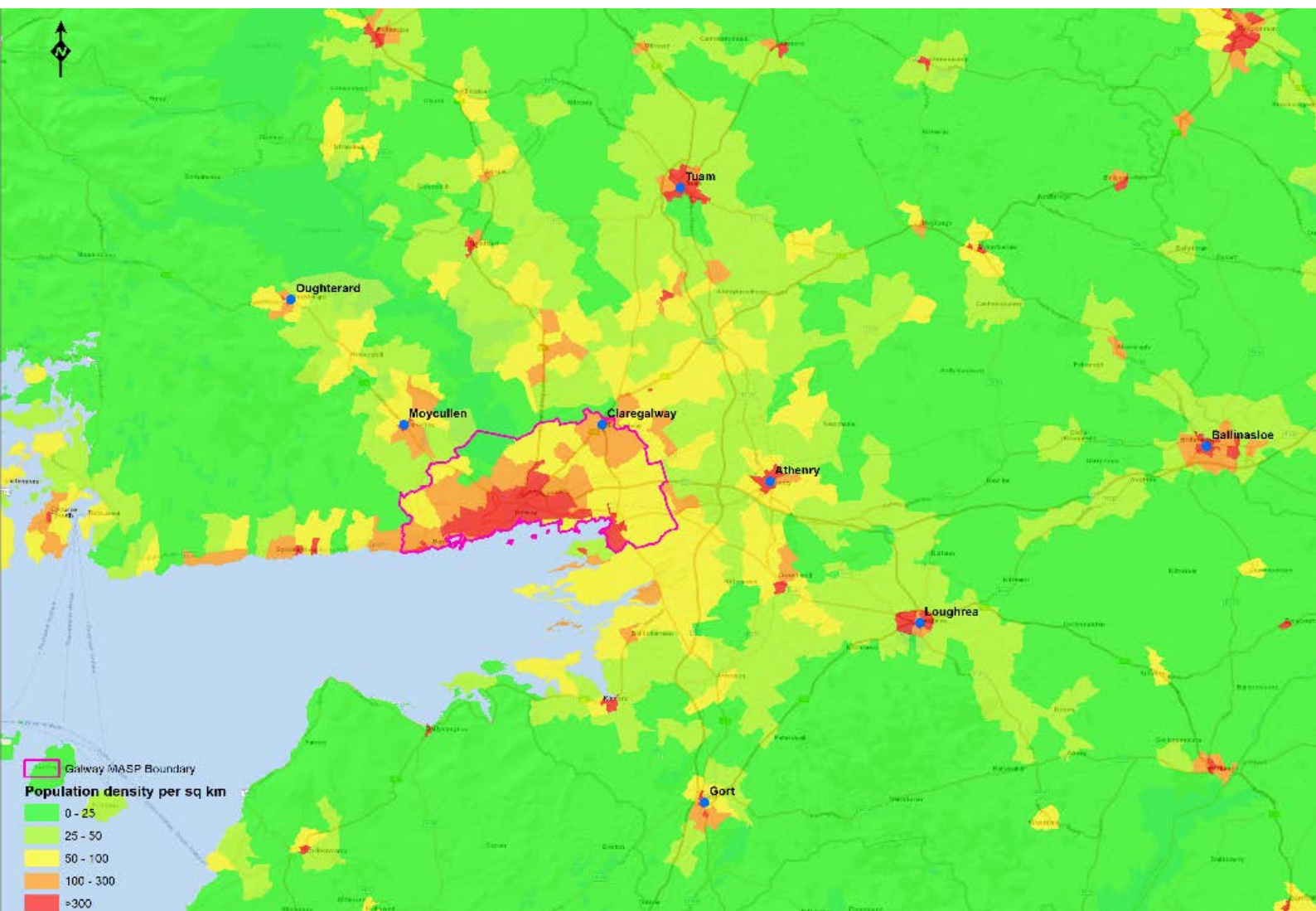


Figure 12. Population Density (total number) per SA, CSO

Figure 13 is another example of population density analysis that was performed for this submission. This analysis utilises a grid system, like that which is promoted by the OECD as the appropriate method of measurement for FUA definition. Each grid is a kilometre by kilometre with colour coding again utilised to highlight areas where there are over 300 people living (red) to those locations with between 0 to 50 (dark green). It further reinforces the population sprawl that is occurring, emanating from a source that is Galway City. Clear pockets of high density exist in Moycullen, Tuam, Athenry and Loughrea, each of which are connected to Galway by 'paths' of slightly lower density pixels. From both Figure 12 and Figure 13 it is possible to make out a distinct area of influence for Galway that goes beyond the MASP boundary.

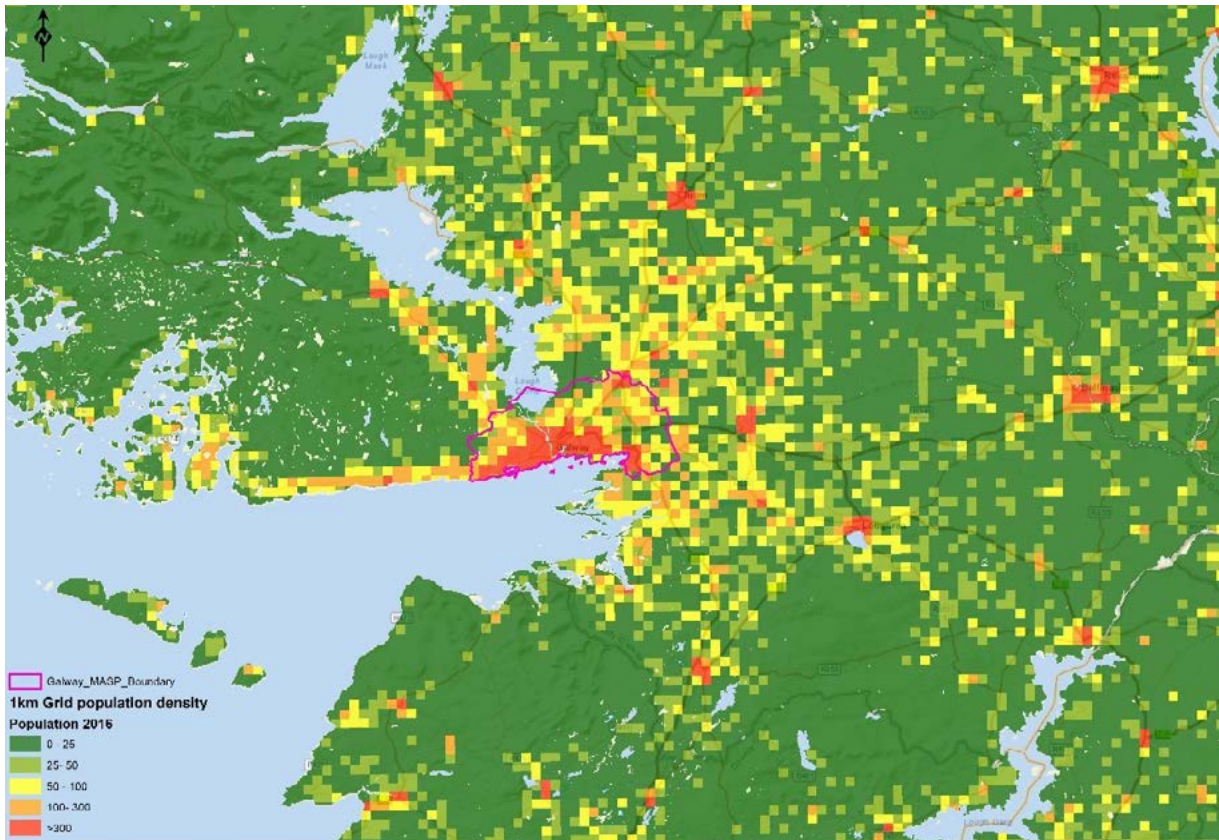


Figure 13. Grid Analysis of Population Density per Sq.km, CSO

Figure 14 is taken from the CSO's interactive mapping service. 'Workplace Zones' are another unit of measurement through which the CSO analysis certain information². They showcase locations where there are significant percentages of 'workers over daytime population'. In other words, it shows those areas where there are high concentrations of employment relative to the resident population of working age. This would allow an understanding of where people commute to work, and the locations of concentrated employment that might exist in business parks or areas of industry.

The OECD methodology for defining functional urban areas, which can in turn be used to help define metropolitan regions, infers that locations of high employment should also be considered for inclusion in a functional urban area. As the image shows, there are significant pockets of employment to the east of the Galway City boundary, particularly adjacent to the M6 towards Athenry. The areas shaded darker red correspond to workplace zones where over 75% of the daytime population are workers, with the lighter red zones areas where 50-75% of the daytime population are workers.

² Workplace zones were created from amalgamating or splitting Small Areas in order to allow for a greater level of analysis on employment and business. Generally, they contain between 100 and 400 workers and a minimum of three workplaces.

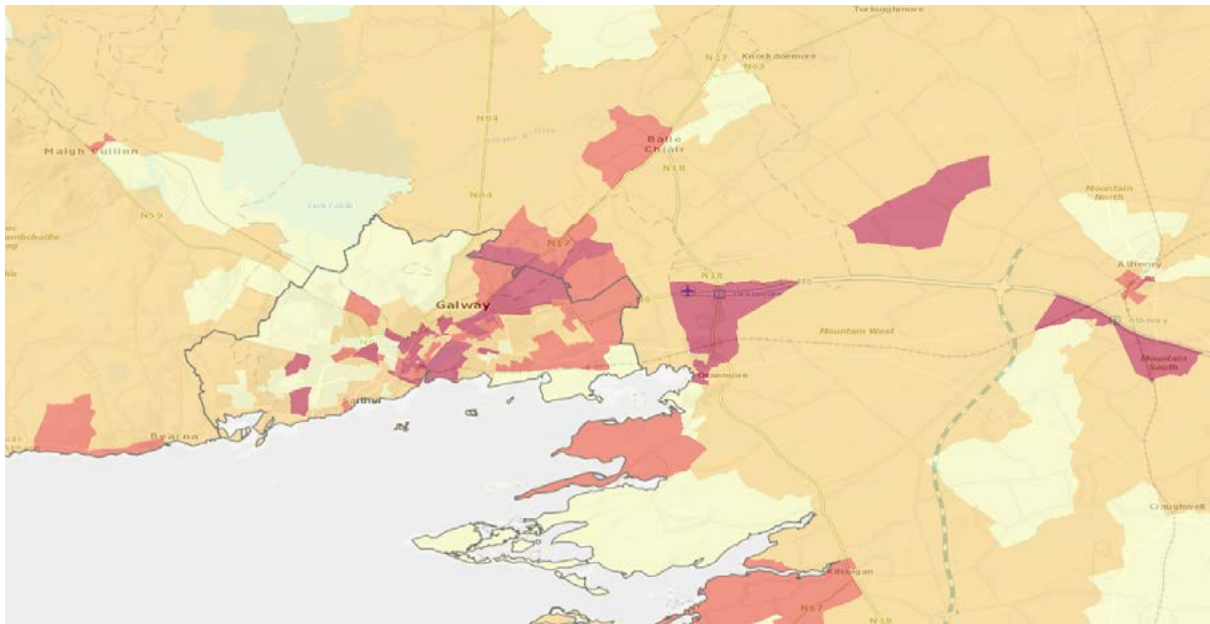


Figure 14. Percentage Workers Over Daytime Population, CSO

Figure 15 again looks at workplace zones as the unit of analysis, however, this time the total number of workers per zone are indicated. This image also provides an understanding of where there are high concentrations of jobs, however it is a more accurate picture in that it states the range of persons employed, whereas Figure 14 gave a proportion relative to the actual resident population. Figure 15 also provides the Galway MASP as a frame of reference and from it you can once more see that there are significant areas of employment located outside the MASP boundary. This would again point towards the need to revise the boundary extent in favour of an increase.

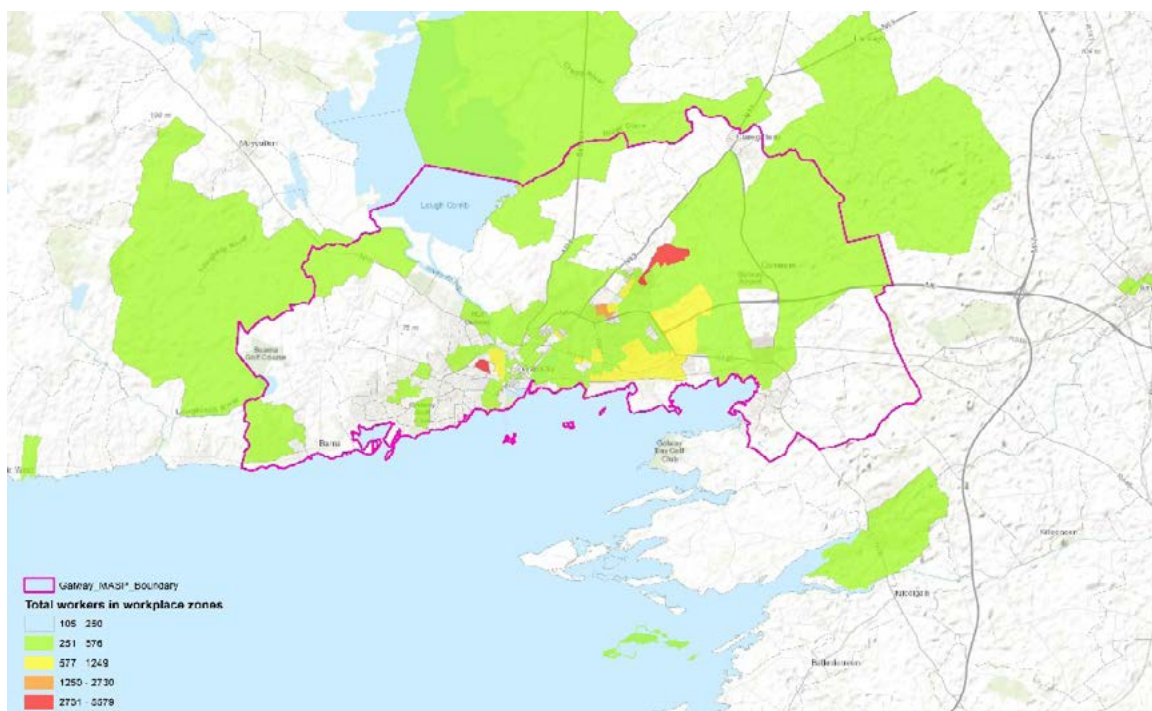


Figure 15. Workers Employed in Workplace Zones, CSO

A Critique of the Regional Spatial and Economic Strategies

The first, and most obvious omission in the Draft RSES is the failure of the Assembly to adequately explain the rationale behind the selection of the current MASP boundary. Although the Southern Assembly Draft RSES offers very little in this regard, it at least provides a statement which specifies the DHPLG as the responsible body for the creation of the Limerick and Waterford boundaries. Similarly, it is understood that both Cork and Dublin have metro zones created during previous studies involving the NTA and DHPLG. The failure to provide an explanation as to the creation of the Galway MASP boundary means the legitimacy of the boundary itself is open to question.

Furthermore, a comparative study of all five MASP boundaries offers an indication as to their creation. Dublin, Cork, Limerick and Waterford all possess boundaries that correspond to Electoral Division boundaries, however, Galway's MASP does not, with additional areas that go beyond the ED boundaries included. It appears that SAs were utilised to manipulate the boundary in alternative ways to the ED method. In itself, this is not a significant issue, but it does beg the question as to why the same methodology employed to create the other MASP boundaries was not utilised for Galway.

Regarding the targeted population increases, there are three separate sets of targets listed in the RSES. The three sets correspond to Galway City and Suburbs, the Galway MASP area, and Galway County. Table 7 summarises each of the three targets, up to the year 2031. A 55% growth in Galway City is stated in the RSES as being the aim for 2040, while separate targets are outlined for the County as a whole. In addition to this, the MASP area itself, which in essence is the middle point between City and County, also has its own targets set. It is interesting to note that although Galway City is supposed to be the subject of the highest levels of growth, it is actually the MASP that showcases higher proportional levels of growth. Obviously, the City forms part of the MASP, however, one would still expect to see the City's targeted growth surpass that of both the MASP and County, proportionately. This higher targeted growth for the MASP, with a 26.5% increase to 2026 and a 40.7% increase to 2031, could prove challenging to meet within the current boundary extent.

Table 7. Population Projections for Galway City, MASP and County, Various Sources

	2016 Population	Growth to 2026		Growth to 2031	
Galway City	79,900	18,050	22.5%	27,300	34.1%
Galway MASP	94,075	25,000	26.5%	38,300	40.7%
Galway County	258,000	47,000	18.2%	70,000	27.1%

The RSES outlines the current availability of zoned lands, providing an approximation of what is available. These lands range from city centre sites (Eyre Square East Quarter) to greenfield sites (Ardaun LAP), and predominantly industrial areas (Oranmore). In total there are roughly 375 hectares of zoned lands within the metropolitan area that, it is stated, could offer the potential for future residential growth. It is also stated that for much of these lands a density of 35 units per hectare is envisaged. If we take a unit as equalling a household, and with the national average of 2.7 persons per household, we find there is the potential for 35,437 persons to be homed. This figure is above the projected City population targets to 2031, but below the MASP target for the same year. Also, considering that a 35 unit per hectare density has traditionally be found only in inner cities and towns, it is unlikely that the total of 35,437 will be realised, creating an increased gap between supply and demand at MASP level.

Table 8. Land Availability as per RLA Study and Draft RSES, DHPLG & NWRA

Zone	Land Availability (Hectares)	35 Units per Hectare	National Average of 2.7 persons per unit
Galway City (RLA study)	302.8	10,598	28,614
MASP minus City (RLA study)	33.9	1,186	3,203
Total (RLA study)	336.7	11,784	31,818
RSES stated Land	375	13,125	35,437
*Athenry & Moycullen (RLA)	43	1,505	4,063

If we take the targeted population figures up to 2031 as a means of analysing the capacity of the available residential land, we see varying degrees of success. Galway City is projected to grow by 27,300 people, while the Galway MASP must accommodate an additional 11,000 to the same year. The land availability listed in the RSES does not define those areas within the City boundary and those outside it in the MASP zone, therefore it is difficult to discern the true levels of availability. Nonetheless, with a total projected growth of 38,300 to 2031, and a total land capacity of 35,437, it is clear that the land identified in the RSES does not have sufficient capacity to reach the targets.

When utilising the RLA study lands we get a mixed picture. The City will grow by 27,300 people to 2031, with the total available zoned land capacity allowing 28,614 persons, therefore it can be said to possess sufficient zoned land. However, an additional 11,000 persons are required to be located in the MASP zone, with the RLA study indicating there exists the potential to house 3,203 persons. This leaves a significant shortfall of approximately 8,000 persons. Athenry and Moycullen are both visible in the map of RLA zonings and combined have the capacity to house roughly 4,063 persons (43ha), which would help contribute substantially towards addressing the shortfall.

An analysis of the catchment area was performed for the RSES as a means of determining the hinterland of the Galway MASP. The OECD definition of an urban area's hinterland includes 'all municipalities with at least 15% of their employed residents working in a certain urban core'. The image below (Fig 17) is taken directly from the Draft RSES and it shows the extent of the Galway MASP's hinterland, with colour-coded EDs that range from 15% (dark green) to 79-90% of workers commuting (dark red). This image is important as it highlights the increased level of reach that the MASP has. A significant proportion of EDs to the north and south of the MASP contain between 55 - 72% of their working population that commute into the Galway MASP area. This in itself showcases the need for further revision of the defined boundary to account for the much larger functional area that clearly exists.

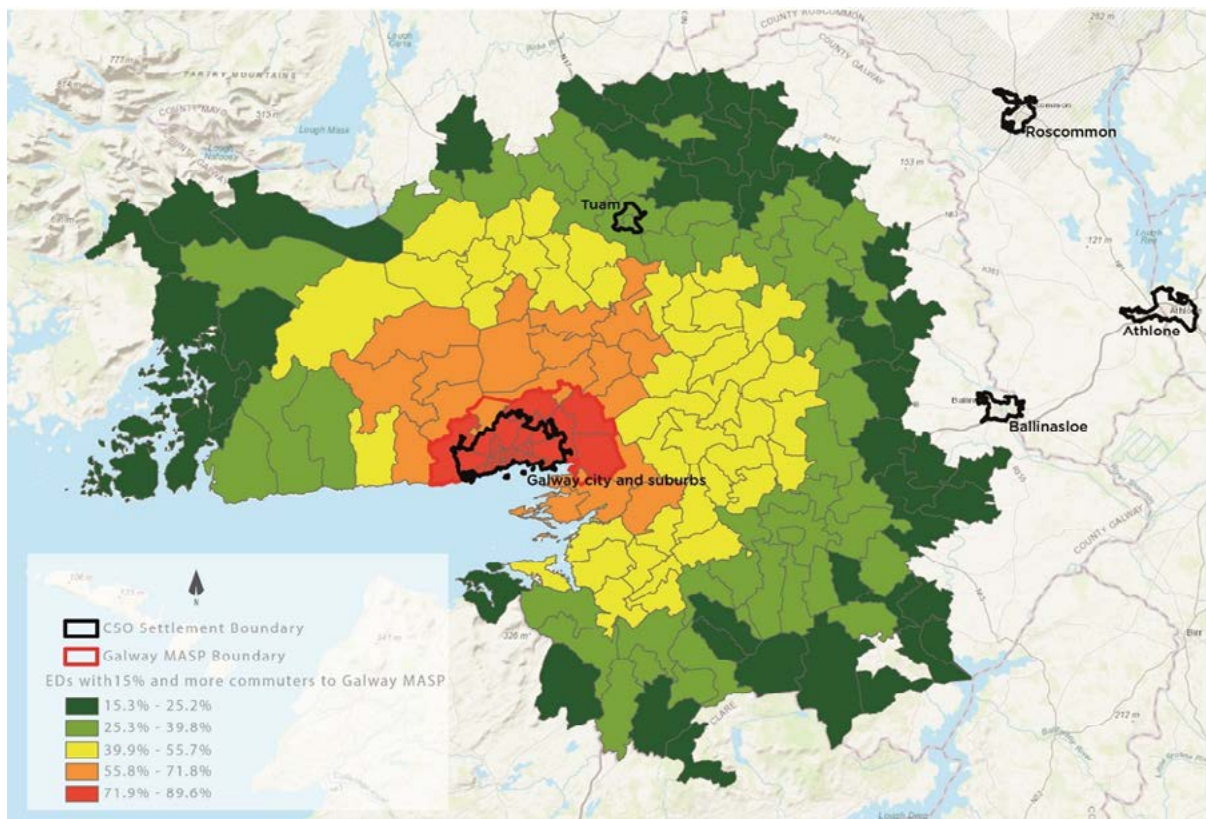


Figure 17. Labour Catchment Commuter Analysis by ED, NWRA

The Southern Assembly's Draft RSES provided the MASP boundary outlines for three of Ireland's five cities. In this respect, it stands out from the other two Assemblies, purely due to the number of cities it contains (three versus one in each of the others). With Dublin and Cork already having pre-defined boundaries, due to previous studies undertaken by the NTA and other government bodies, only Galway, Limerick and Waterford required newly defined metro boundaries to be created. Therefore, it is worthwhile comparing each of the MASP boundaries to understand if consistency in definitions existed. Figure 18 offers a visualisation of all five boundaries, coloured differently and overlaid onto the Dublin metropolitan region for purposes of scale. The image provides a startling visualisation of the sheer size of both Cork and Limerick's metropolitan boundaries, particularly when compared to both Galway and Waterford. Indeed, the Cork MASP is only slightly smaller than its Dublin counterpart, even though its population amounts to a mere 22% of the Dublin MASP region.

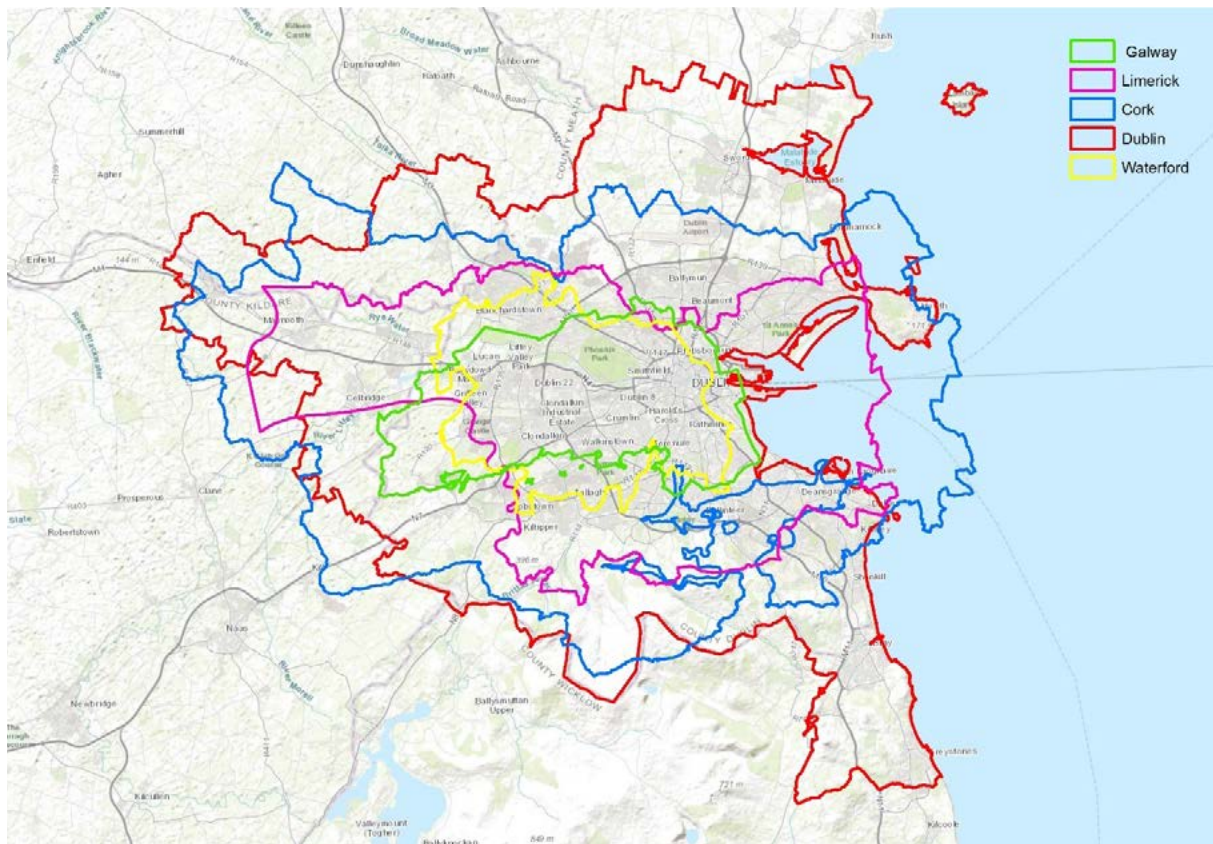


Figure 18. Overlay of City MASP Boundaries

Table 9 provides a more detailed analysis of the MASP regions and seems to offer a worrying indication of the failure of the various regional authorities and governmental bodies to ensure consistency and standardisation takes place through the definition of the metropolitan boundaries. Dublin, as the largest city also has the largest area, although it is only slightly more than the area that comprises the Cork MASP boundary. Dublin is also the only one of the five cities that comes close to the OECD's definition of what constitutes an urban core or metropolitan area, with its population density of 1488 persons/sq.km almost on par with the OECD's recommended 1,500 p/sq.km. Interestingly, Galway is the next best performing in this measure, with a density of 580.65 p/sq.km. However, there is clearly an issue in the area designated for the Galway MASP boundary as it is significantly smaller than Limerick, a city that is comparable to Galway in its current population size. The Limerick MASP area extends to approximately 439 sq.km, which is over 2.5 times the size of Galway's MASP boundary.

Table 9. MASP Populations, Land Area and Densities

Metropolitan Area	Population	Area Sq.km	Population Density
Cork	305,406	833.4	366.46
Dublin	1,399,234	940	1488.55
Galway	93,426	160.9	580.65
Limerick	132,420	439.8	301.09
Waterford	59,854	152.8	391.71

Furthermore, the following statistics are true of the MASP boundaries for each of the five settlements as they currently exist in each Draft RSES:

- **Waterford MASP has 64% of the population size and 95% of the land area that the Galway MASP possesses;**
- **Galway MASP has 70% of the population size and 36% of the land area that the Limerick MASP possesses;**
- Limerick MASP has 43% of the population size and 53% of the land area that the Cork MASP possesses; and,
- Cork MASP has 22% of the population size and 88% of the land area that the Dublin MASP possesses.

Quite clearly there is a significant disparity between the boundary definitions for each city. Currently, Galway City and Suburbs contain 79,934 residents, while Limerick City and Suburbs contain 94,192 residents. Galway's population is 85% the size of Limerick, making both cities quite comparable. Yet, as the figures and images show, Limerick's MASP boundary is substantially larger than Galway. In fact, Galway is more comparable, by this measure alone, to the Waterford MASP, which is practically identical in size (95% of Galway's total area), even though Waterford's population is almost half that of the Galway MASP. The levels of inconsistency that exist between the definitions of the MASP boundaries is worrying, and it is obvious that a revision to the Galway MASP is required so as to allow it to reflect its true area of influence, similar to Limerick.

Adherence to the DHPLG Implementation Roadmap for the NPF and Circular

The Department of Housing, Planning and Local Government 'Implementation Roadmap' and accompanying Circular the MASP Boundaries were released with the intention to resolve any outstanding questions that related to the NPF, RSES' and MASPs. Combined, they both set out several recommendations to assist in the development of the MASP boundary extents, including:

- Selection of areas that comprise the cities, their immediate suburbs and surrounding areas that have sufficient development density and have **a level of integration with the primary urban centre.**
- Identify strategic growth areas that can provide **zones for employment, increased national and international connectivity** for the city, and areas that offer **regeneration potential.**
- Electoral divisions where at least 60% of the labour force works in the principle urban area are to be included, but **EDs with less than 60% can also be included in the metropolitan area.**

The current Galway MASP boundary can be said to adhere to the main recommendations of the DHPLG guidance documents, however, it can be argued that the current boundary fails to account for several locations that are proximate to Galway City and Suburbs while already providing 'zones of employment' and offering increased national connectivity. Equally there are locations that already have high levels of integration with Galway City. Areas such as Moycullen and Athenry, in particular, meet these recommendations and are worthy of inclusion within an extended Galway MASP. This report has shown, through the varying methods of analysis, that this is the case.

Furthermore, as an additional means of highlighting those areas that possess high levels of integration with Galway, allow for national connectivity and offer key zones of employment, a drive-time analysis was undertaken. With improvements to the local and regional road network there have been major reductions in the travel time, notwithstanding the increasing levels of congestion that the city centre is experiencing. It is beyond the scope of this submission to discuss the issues that surround private car usage and the drive-time analysis does not seek to support increasing car use. Instead, it simply attempts to provide an understanding of how movement occurs throughout the region. Figure 19 colour codes travel times, with categories broken into 15, 30, 45 and 90 minutes' drive time. Gort, Loughrea and Tuam lie just outside of the 30-minute zone, on the edge of it in all cases. Oughterard and Athenry are both inside the 30-minute drive-time zone, while Moycullen and Claregalway can be reached within 15 minutes. This shows the relative ease at which these locations can be reached from Galway City.

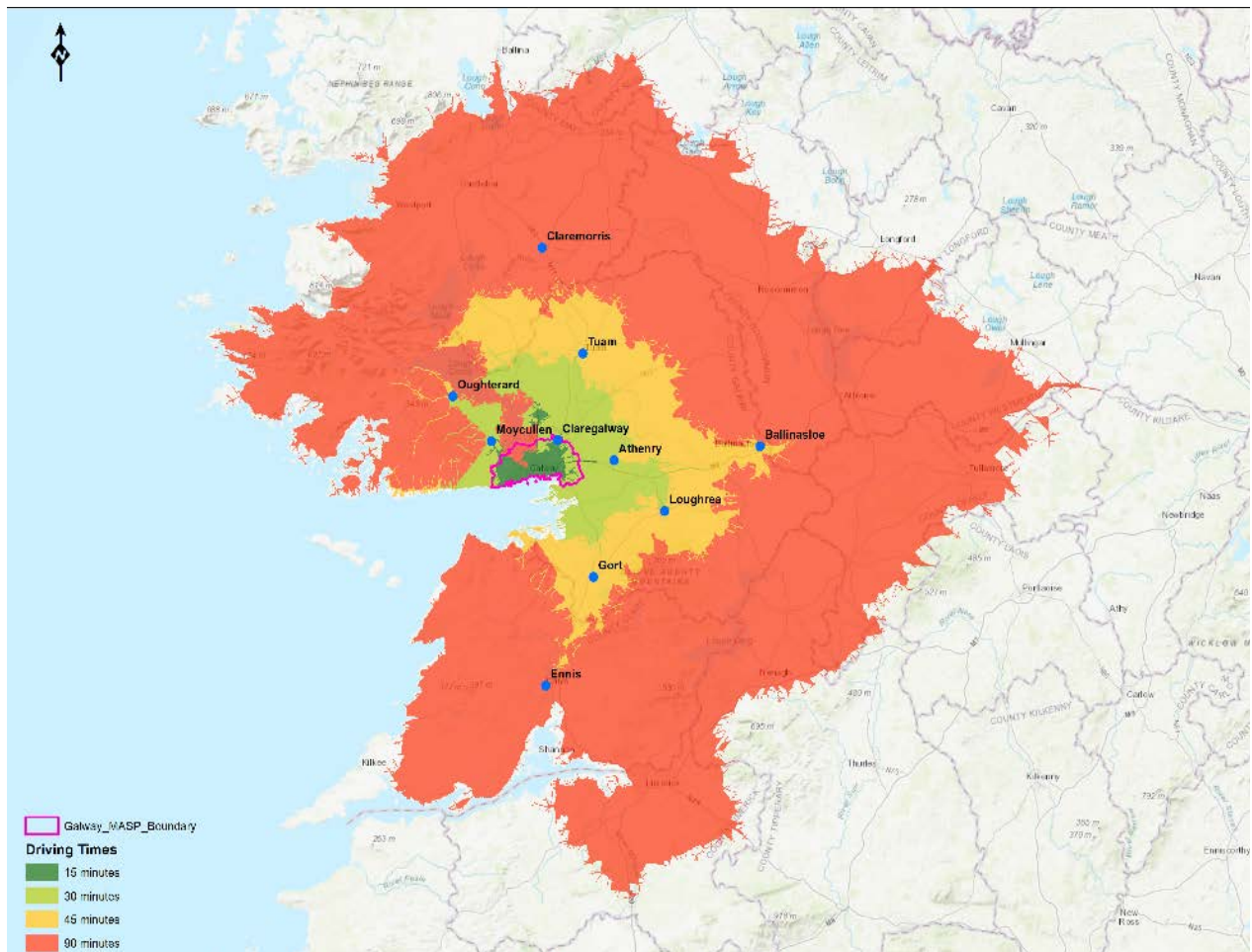


Figure 19. Galway MASP Drivetime Analysis

Moycullen provides Galway City with a settlement of significant potential for economic and residential growth, while also acting as the gateway to Connemara and west Mayo. Athenry is located along the Strategic Economic Corridor, which connects Dublin to Galway, and possesses a rail station that serves one of the country's busiest routes. It also is the location of lands that have been earmarked for transformative development for industrial, high-tech uses. For these reasons a revision of the Galway MASP boundary should take place to include Moycullen and Athenry, in particular.

A MASP as the Solution for the Galway Local Government Committee

In 2015 the Galway Local Government Committee released their report into the local government arrangements in County Galway. This report, commissioned by national government, sought to determine the best course of action for creating a more efficient and effective local government structure in Galway City and County Councils. Having analysed four alternative scenarios a conclusive judgement was reached by the Committee which saw them support the amalgamation of both Councils into what they termed the 'Greater Galway Authority' (GGA).

Reasons for support of an amalgamation included:

- » A greater ability to interact with national bodies such as the NTA, IDA, EPA, etc.
- » A stronger organisation that could efficiently target FDI.
- » An administrative area of sufficient scale to counter the Greater Dublin Area.
- » Increased ability to tackle interlinked problems that affect both the city and county, particularly issues such as traffic, economic development and tourism.

Reasons against the amalgamation included:

- » Galway City losing autonomy and control over its future.
- » The area would be too large to adequately account for the different challenges that face the truly rural areas and the highly urbanised ones.
- » It would be too large an area for a single local authority entity to administer.

Throughout the submission a case has been made for the revision, and subsequent extension of the Galway MASP. Details of the extent of Galway City's labour catchment, economic influence, connectivity and future growth patterns have been alluded to. Therefore, it should be clearly evident that an extended Galway MASP boundary would have the ability to fulfil the requirements and stipulations of the Galway Local Government Committee, namely the pros and cons produced as a rationale for local authority amalgamation.

An enhanced metro area would be of sufficient scale to interact with national bodies, particularly those such as the NTA who operate at a regional level. Equally, the concept of a city-region has gained traction in spatial planning discourse over recent years, with city-regions now touted as the future drivers of regional and national economies. An enlarged Galway MASP would provide the West of Ireland with a city-region of scale, one that already possesses a significant number of FDI companies and jobs and has the ability to attract more, particularly through the clustering affect. A larger Galway MASP would also allow for a truly collaborative mechanism for the integration of city and county transport systems and the designation of strategic sites for economic development. The Galway Transport Feasibility Study, as referenced earlier in this report, provides an excellent example of a transport strategy prepared at a city-region level.

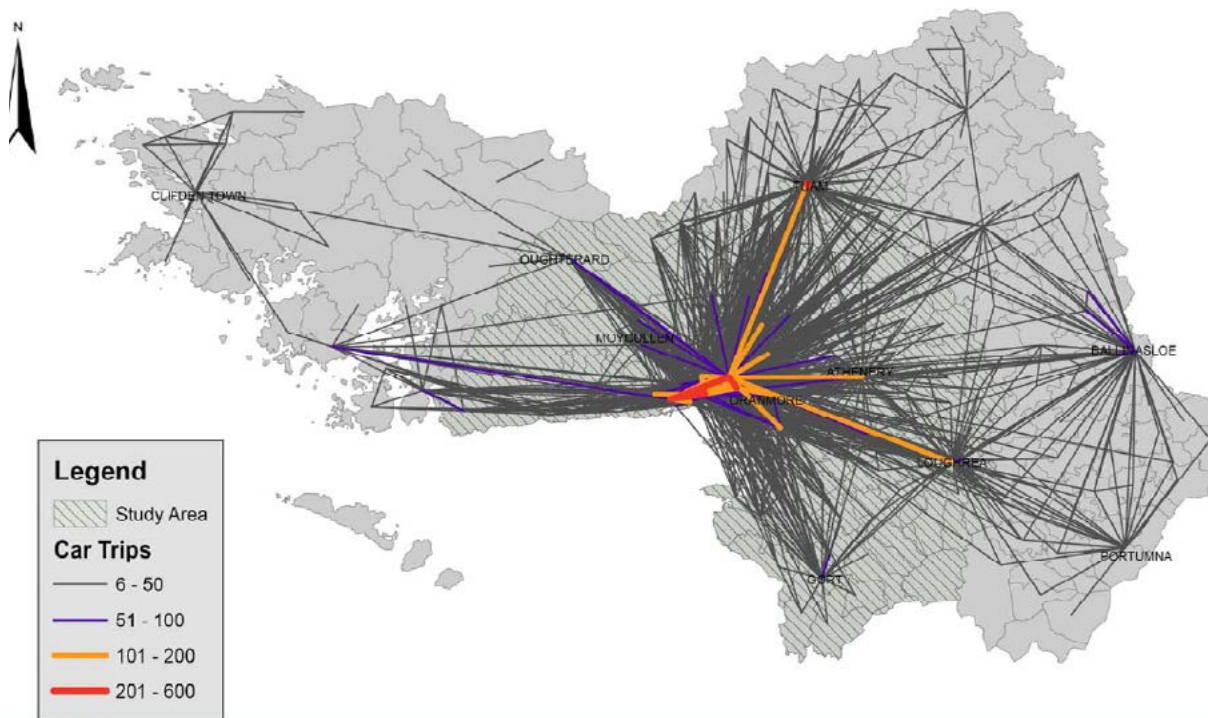
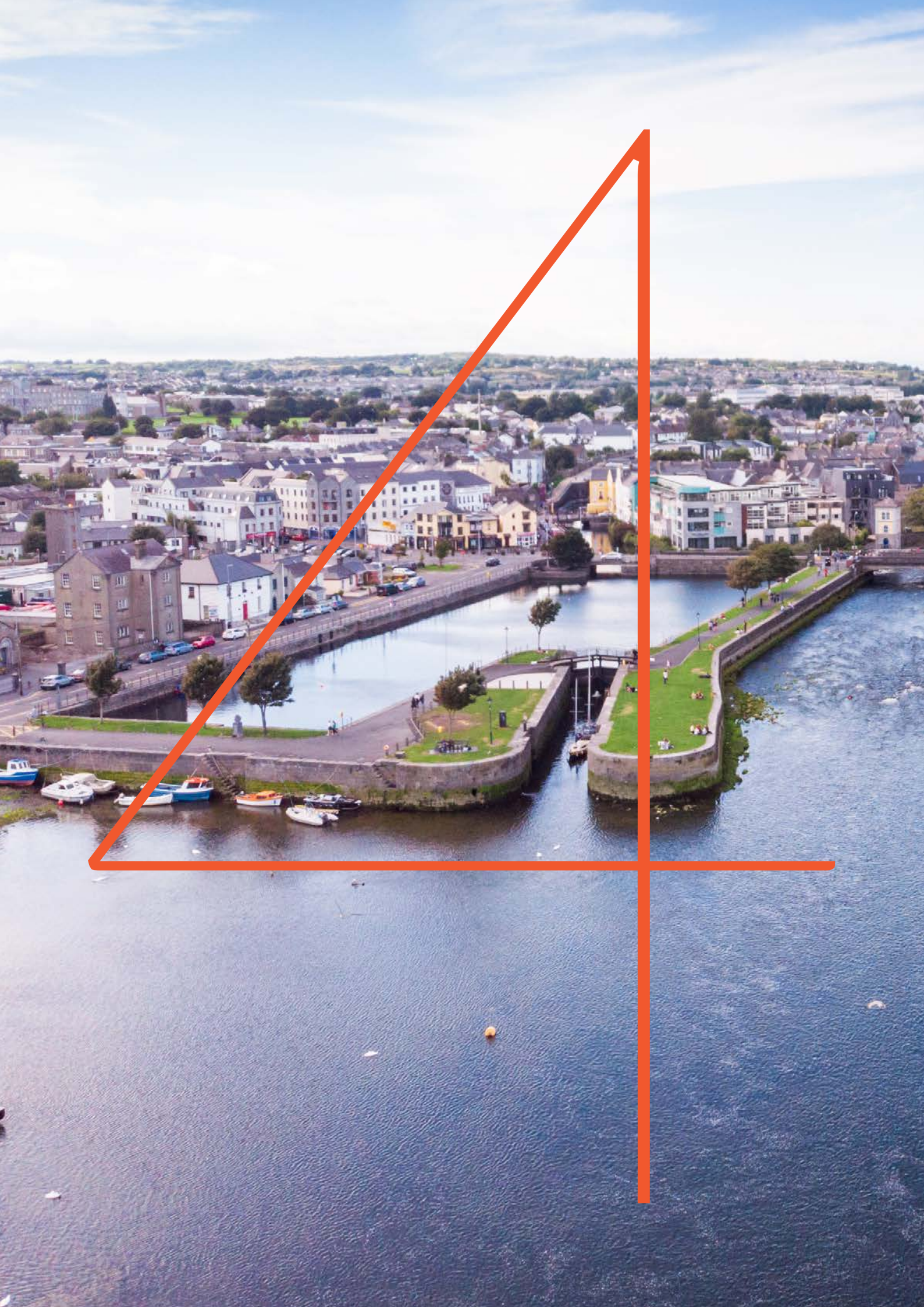


Figure 20. Private Car Commuting 'Desire Lines' for County Galway, GTPS

Equally, an expanded Galway MASP would adequately address the issues the Galway Local Government Committee identified with an amalgamated Council. As it provides a new form of governance, that of a metropolitan zone, neither the City or the Council would cede control over the direction of their development. Instead the metro zone would stimulate proper collaboration, while emphasising the importance of the city centre as the key driver, thereby ensuring Galway City retains its sense of autonomy and importance. The metro area would also, by definition, only extend to those regions that are within the functional urban area of the city. In other words, those areas that are genuinely remote and rural would not fall under the remit of a metro zone and would continue to have tailored policies and interventions that accounted for their particular characteristics. Finally, and linked to the previous point, the metro area consists of a functional urban area, one that already acts as a single economic entity. It would not, therefore, be of such a scale that is too unmanageable for a single authority, a moot point considering the collaborative nature of the MASPs, which include multiple representatives of local and regional authorities.





Recommendations

Recommendations

The following series of recommendations are based upon a review of the pre-existing literature that relates to metropolitan zones, a critique of current national and regional policies that make provisions for the MASPs, and the detailed analysis performed by FAC on behalf of Galway Chamber for this submission. These recommendations adhere to the findings of this report and are offered as solutions that would improve the currently iteration of the Galway MASP, ensuring a revised version sufficiently addresses the needs and ambitions of the Galway Region, as a whole.

1. The current version of the Galway MASP, as outlined in the Northern and Western Regional Assembly's Draft RSES, should be extended beyond its current boundaries to include key settlements such as Moycullen and Athenry, both of which have proven and deep-rooted economic linkages with Galway City.
2. The Strategic Economic Corridor, which extends eastward from Galway City, through Athenry, to Dublin offers the West Region an economic corridor of national significance. The existing, quality transport connections, such as the rail-line and motorway, along with numerous greenfield sites of strategic importance, in such close proximity to Galway City mean that any integrated economic and spatial plan for Galway must include these locations.
3. Locations such as Galway Airport, which have been earmarked for future redevelopment, currently exist outside the boundary of the Galway MASP and it would prove a missed opportunity if they were not allowed to form integral parts of a new metropolitan vision.
4. The projected population targets set by the NPF and detailed in the Draft RSES would seem to contradict the current existing zoned lands for residential use. Failure to increase the MASP boundary could lead to a shortfall in the numbers of units available for the increased population. Existing residential zoned lands in locations such as Moycullen and Athenry would alleviate this shortfall significantly.
5. Any Metropolitan Transport Plan for the Galway region, such as the Galway Transport Strategy, would inevitably include areas with significant commuting populations to Galway City, such as Moycullen, Tuam, Athenry and Loughrea. Therefore, this would necessitate an extension of the current MASP boundary to include a wider zone that incorporates some of those areas included in a regional transport plan.
6. Consistency in the designations of MASP boundaries across each Regional Assembly RSES is required. Cities such as Cork, Limerick and Waterford have seen boundary definitions that are disproportionately large when compared with the Galway MASP. It is imperative that Galway receives the same recognition when defining a metropolitan zone as cities of a similar scale, particularly Limerick.







Conclusion

Conclusion

This submission has attempted to convey the urgent necessity for a revision to the current Galway Metropolitan Area Strategic Plan (MASP) boundary, as described in the Northern and Western Regional Assembly's Draft RSES. Both the NPF and the Draft RSES recognise the essential role that the Galway city-region already fulfils at a national level. It offers the West of Ireland its only metropolitan area of significant scale, one that if the required supports are provided for could compete with similarly sized city-regions, internationally.

The NPF requires each Regional Assembly to prepare a MASP for those cities located within their boundaries. It is acknowledged that this can be a challenging task and the currently existing iteration of the Galway MASP in the Draft RSES offers a reasonable attempt at doing so. However, as this submission has highlighted, there are key economic locations and sites of strategic importance that clearly form part of Galway City's functional urban area yet are omitted from the current MASP zone. It is imperative, if Galway is to achieve its substantial future potential, that a boundary extension occurs to incorporate these locations.

While this submission has provided myriad, valid socio-economic arguments that support a boundary extension, there are also more fundamental reasons for doing so. In conjunction with the Department of Housing, Planning and Local Government, the NPF establishes a series of steps to follow when defining each MASP. Most importantly, it calls for a consistency in the MASP definitions across all Assembly strategies. As this submission has shown, there are glaring inconsistencies in the MASP boundary extents across all five cities. For example, Galway, a city of almost equal size to Limerick, possesses a MASP boundary that is approximately 1/3 that of Limerick's. A readjustment of Galway's boundary, to reflect that afforded to Limerick, is required if the legitimacy of the entire MASP process is not to be called into question.

Finally, Galway City and Suburbs already possess a significant zone of influence that extends into all surrounding counties. It is a City that has shown consistent levels of population and employment growth, even throughout more tumultuous economic times. As one of Ireland's most important locations for FDI, outside of Dublin, and a city renowned for its hospitality and attraction to tourists and international migrants, Galway can be expected to continue to grow and prosper. In order to ensure it has the strongest opportunity to do so it is vital that the entire functional urban area is included in a metropolitan boundary. The MASP, if extended, would allow Galway to develop an integrated, collaborative approach to its future sustainable economic growth.



**Galway
Metropolitan
Boundary Definition**

Submission to
the Northern and
Western Regional
Assembly's Draft
RSES





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