



Northern & Western
Regional Assembly



IRELAND 2040

DRAFT NATIONAL PLANNING FRAMEWORK

SUBMISSION FROM
NORTHERN AND WESTERN REGIONAL ASSEMBLY
November 2017



Ireland's European Structural and
Investment Funds Programmes
2014-2020
Co-funded by the Irish Government
and the European Union



European Union
European Regional
Development Fund

NWRA our REGIONAL ASKS

Letterkenny / Derry
as designated City
Region (MASP)

Sligo & Athlone as
designated
Regional Drivers

The Atlantic Economic
Corridor –
Galway to Derry

Regional Growth –
Positive
Discrimination

An agile NPF –
Flexibility for our
larger towns

Brexit – a fund for the
Border Region:
Ringfenced

MASPs: Greater
Clarity on Governance

Rural Areas &
Gaeltacht:
Recognising strengths

Intra-Regional &
Cross Border
Projects

Table of Contents

<i>Introduction</i>	4
<i>Background</i>	4
<i>How to enhance the current draft NPF</i>	5
1. Letterkenny/Derry joined City driver of national growth (North West City Region).....	6
2. Sligo and Athlone	6
3. <i>Atlantic Economic Corridor</i>	7
4. <i>Effective Regional Development means Effective Discrimination</i>	7
5. Agile Framework	9
6. <i>Brexit</i>	11
7. Metropolitan Area Strategic Plans (MASP).....	11
8. Rural Places and Gaeltacht	12
9. Intra-Regional & Cross Border Projects:	13

Introduction

The Northern and Western Regional Assembly (NWRA) welcome the opportunity to make a submission in respect of the Draft Ireland 2040 – Our Plan, which is on the final stage of public consultation.

The Assembly wish to congratulate the Department of Housing, Planning and Local Government for meeting this milestone and in producing a framework that provides an opportunity to both capture the expectations of a nation whilst planning for a future that will be heavily influenced and interrupted by ongoing radical technology change. The NWRA is mindful that this is a national framework that shall be implemented and amplified by the Regional Spatial and Economic Strategy (RSES). It is within that context that a number of '**Regional Asks**' are being made.

The NWRA makes nine strategic 'Asks' that will enhance both the NPF and also enable our region to formulate a more effective, flexible and realistic Regional Spatial and Economic Strategy.

These 'Asks' refer to

1. Letterkenny / Derry as a city Region, enhancing national growth & GDP
2. Regional potential: Sligo & Athlone
3. Atlantic Economic Corridor: Growth, Employment and Population
4. Investment prioritisation
5. Agile Framework
6. Brexit
7. Metropolitan planning
8. Rural places & Gaeltacht
9. Intra-Regional & Cross Border Projects

Background

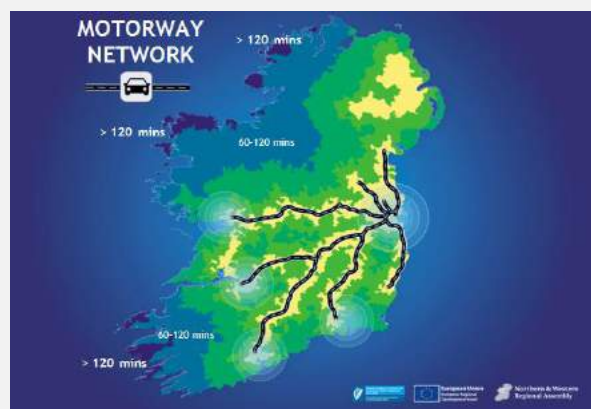
The Northern and Western Region hosts almost 850,000 inhabitants (CSO 2016), representing almost a fifth of the national population. Within our economic catchment this figure increases to over 1.1m people. Its main city-region is Galway but it also enjoys the unique Cross Border City region formed by Letterkenny-Derry. The main industries in the region are Agriculture, Tourism, Marine and Maritime, Medical Devices, BioMed, ICT, Creative

Industries, Lifesciences/Pharmaceutical, and Financial. In 2014, more than 40,000 businesses were recorded in the region and in that year the region produced more than €21 Billion (12% of national production).

The region shows signs of recovery to pre-recession productivity levels with an increasing number of people in employment, but it is lagging the other two regions in terms of regional productivity. As a NUTS II Region, in fact, our EU categorization may move back from ‘Developed Region’ to ‘Transitional Region’ due to lack of critical infrastructure (CPMR, 2017).

The gap is widening and without appropriate intervention presents a threat of greater uneven regional development. The economic underperformance could arguably be explained by the endemic lack of infrastructure in the region, which a potential gamechanger like the NPF could and should mitigate (See Figure below and the NWRA submission to the NPF Issues and Choices consultation).

Figure: Layers of Infrastructure, motorway extensions



How to enhance the current draft NPF

In order to assess how the NPF can be an effective game-changer, the Northern and Western Regional Assembly engaged with regional stakeholders, Minister English and Officials from the DHPLG before forming the view that the following key issues need to be addressed as a priority to bring about an effective change and enable the unlocking of our key value propositions

1. *Letterkenny/Derry joined City driver of national growth (North West City Region)*

It is of national importance that the settlements of Letterkenny-Derry are designated as a unique cross-border 'All Island' driver of national growth, with Derry being the fourth largest city on the Island of Ireland; This will build upon the unique platform that exists through the North West Strategic Growth Partnership, as endorsed by both Governments within the North/South Ministerial Council and as acknowledged within the Draft NPF. It has the potential to reinforce good community working relationships, enhance cross-border co-operation and importantly secure opportunities and mitigate threats arising from Brexit. It is the strategic view of the NWRA, as articulated in the submission to the NPF 'Issues and Choices' consultation, that the NPF must take an Island of Ireland approach and recognise the role and function of Letterkenny-Derry as an All Island economic driver of growth for the joined North West City Region. The work of the North West Growth Partnership is changing the legacy of 'back to back planning' and the region is beginning to enjoy the benefits of immersive cross-community activity within the region.

Regional Ask: That the NPF include 'Letterkenny – Derry' as a unique Joined City Region (North West City Region) and thus form part of the suite of Metropolitan Area Strategic Plans to be prepared through the RSES process.

2. *Sligo and Athlone*

The Draft NPF acknowledges that the role and function of settlements within the Northern and Western Region is much greater than settlements of a similar size in the other regions. Sligo performs as a 'Significant Regional Urban Centre and Economic Driver' for this region that should be recognised for its potential to perform the role and function as a mini City Region in the NPF; Athlone straddles the Roscommon/Westmeath county boundary on the south eastern regional interface of the NWRA and Eastern and Midlands Regional Assembly. It also has the potential to perform a similar role and function to that of Sligo (See our submission under the NPF Issues and Choices consultation).

The NPF must acknowledge this reality and by implication enable the fast tracking of the Capital Investment Plan's consideration and prioritisation of necessary

infrastructural investments, rather than awaiting the outcome of the RSES as suggested in the Draft NPF.

Regional Ask: That the NPF identify both Sligo and Athlone as Significant Regional Urban Centres & Economic Drivers with potential for each to perform their respective role and function equivalent to a City Region.

3. *Atlantic Economic Corridor*

The Atlantic Economic Corridor is to be driven southwards from the joined Letterkenny/Derry City Region and simultaneously it is to be driven northwards from the Cork, Limerick and Galway City Regions; The premise in the draft NPF that it starts in the south and shall extend northwards from Galway and beyond is not appropriate and the draft NPF must be modified so that the opportunities presented by the entire reach of the AEC are unleashed.

Regional Ask: That the NPF confirm that the Atlantic Economic Corridor is to be driven southwards from the joined Letterkenny/Derry City Region and simultaneously that it is to be driven northwards via the Galway/Limerick/Cork City Regions.

4. *Effective Regional Development means Effective Discrimination*

The NWRA collaborative submission to the NPF 'Issues and Choices' set out the challenge for the NPF to provide effective regional development and this challenge remains. The NWRA view the NPF as an ideal opportunity to adopt a transformative approach, not just to address a legacy of underinvestment, but also to alleviate national spatial, housing and transportation matters.

The Draft NPF vision and strategy takes up the challenge but there is a worrying absence of coherence between the vision/strategy development sections and the implementation and investment section of the draft NPF, which must be rectified in order to secure the integrity of the NPF and to deliver effective regional development.

The Draft NPF states that its Vision is to be delivered through 8 separate pillars/values, including Opportunity (delivering fair play and opportunity for all), Choice, and Connectivity (Including a Target of a 30 min commute). The Draft NPF says that it shall not implement a 'business as usual' strategy and that this NPF is

capable of facilitating a more inclusive and integrated growth that is distributed more broadly throughout Ireland in a way that would be transformational.

The strategy section of the Draft proceeds to set out two key variables to be addressed as, firstly, the scale of activity and, secondly, the relative distance or ease of accessibility to centres of scale. The need to improve accessibility to the North West and between centres of scale separate from Dublin, focused on cities and larger regionally distributed centres and on key east/west and north/south routes is highlighted.

However, the Implementation section of the Draft NPF proposes that the priority action is to firstly direct national investment to the 5 Cities along and south of the Dublin to Galway axis and it is only after Smart Growth Objectives are achieved for these settlements that it is proposed to further develop connectivity between centres of population (Rf.Chapter 9.1. P.123 and P30-31).

It is critical that the output of this strategy does not in effect result in

‘business as usual’ and for that reason it is of concern that the apparent national investment priority being given to the 5 Cities has the potential to inadvertently result in:

- a) exponential growth in regional divergence,
- b) failing to bridge the development gaps across the state or mitigate the legacy of underinvestment in the region north of the Dublin-Galway axis.

It is necessary, as a priority, to invest in critical enabling infrastructure in terms of the electricity grid to enable the harnessing of our renewable energy potential. It is also an imperative to provide the necessary prioritised investment in the critical road infrastructure network, north of the Dublin to Galway axis, to a Ten-T ‘High Quality Road’ standard, together with investment in other forms of lifeline infrastructure for the region (including physical infrastructures, enterprise capability, sectoral mix, skills etc).

Failure to undertake these investments will threaten our ability to harness our regional value propositions, as set out in the NWRA submission to the ‘NPF Issues and Choices consultation’.

Regional Ask: (a) Remove references to the investment in the Northern and Western Region as being subsequent to investment in the Cities and include a provision across the NPF that intervention for the Northern and Western Region shall be a priority, by invoking a whole of government approach that secures positive discrimination which prioritises investment in the region.

(b) Prioritise investment in the Electricity Grid Network and Road Infrastructure to a Ten-T 'High Quality Road Standard' to the Northern and Western region, thus providing lifeline routes to rural communities, enabling access to essential goods and services, such as education, healthcare and employment that are necessary to sustain rural communities.



Map: Priority Road Projects in the NWRA.

5. Agile Framework

The current share of the national population within the Northern and Western region is 17.8% (Census 2016). Over the period to 2040 the NPF projects that whilst there shall be growth within the region, the overall share shall fall by between 0.3% to 2.5% and this is reflected in the projection that population growth shall be between 150,000 and 175,000. This may well be the case and as the background data explaining the projections are not available it is not possible to form an informed view as to the robustness of the figures and whether they have

taken account of the policy interventions that are being sought within this submission.

In terms of rural places, the population target globally for rural areas is to be 15% and this shall be a challenge for this region because when one works the figures through for the Northern and Western Region the growth target would be between 11 and 14%, (Depending upon growth rate of 150,000 – 175,000 population and factoring the increased share of population targeted towards our settlements with a population of >10,000).

It would be important that the population projections are maintained as being ‘targets’ so that the framework is agile and flexible and not used as a barrier to the unlocking of our regional opportunities and value propositions. By way of example our marine resources offers a significant national value proposition that can directly benefit our coastal communities, which is recognised in Government targets to significantly increase the portion of GDP generated from the marine. The finalised NPF should include a facility that will allow flexibility for innovation and new

departures that may emerge in sectors such as the marine.

Finally, the readability and legibility of the document is inhibited by the variety of definitions of ‘urban’ and settlement envelopes. The document would benefit greatly from a more clear definition being provided and maintained across the entire document.

Regional Ask: (i) That the variety of definitions given for ‘urban’ within the document be resolved, thus improving its readability and legibility.

(ii) That the Draft NPF population and employment projections be reviewed to ensure that they take cognisance of the positive policy interventions sought within this (and original) submission that shall unlock the value propositions within the region.

(iii) That the NPF confirm that the population and employment projections are Targets for future growth that guides the general pattern of development and of themselves are not to act as a barrier to the harnessing of our regional opportunities and value propositions.

6. *Brexit*

It is acknowledged that the potential impact of Brexit is not yet understood but nonetheless it is inevitable that the border area has the potential to be most significantly impacted, either positively or negatively, from a social, economic, environmental and cultural perspective. The document undertakes that the new National Investment Plan shall strengthen the economy's resilience in terms of key risks, in particular Brexit. It references the need for co-operation and joint development of cross-border areas such as in the Dublin-Belfast corridor, the North West, and the Cavan/Monaghan central border areas, which will be very important post Brexit to open up the potential of the island economy.

However, it relegates the accessibility of our region to the period after the core areas in key cities and towns have been mobilised. This timeline is worrying (See Regional Ask 4(b)). The NWRA consider that there needs to be ringfenced funding for this border region through a variety of measures that will enable potential opportunities and mitigate threats and to also prioritise accessibility to the Northern and Western Region (including physical infrastructures, enterprise capability, sectoral mix, skills etc).

Regional Ask: That the NPF prioritise accessibility to the Northern and Western Region and ringfence funding for the border region through a variety of measures that will enable potential opportunities and mitigate threats as they become better understood.

7. *Metropolitan Area Strategic Plans (MASP)*

The Draft NPF articulates the need for a MASP for each of the cities and that the Regional Spatial and Economic Strategies are to be put in place to co-ordinate local authority plans at a strategic level. It suggests that the area of 'Regional Assemblies' may be too broad to be able to sufficiently focus on city and metropolitan issues. It subsequently states that the MASP's shall be developed in tandem with and as part of the RSESs'.

It is imperative that the Regional Assembly is strengthened in the Implementation Chapter as the principal vehicle for delivering both the RSES and MASP. The document would benefit from greater clarity around the governance and delivery mechanism proposed. It is considered that the RSES is the appropriate mechanism to set the

strategic context for Metropolitan Plans and that their delivery can subsequently be made to align, implement and amplify the RSES and other investment sectoral plans.

Regional Ask: That greater clarity be provided around the governance and delivery mechanism for the MASPs' and confirm (within the NPF) that they shall form an integral part of the RSES output

8. Rural Places and Gaeltacht

The emphasis in the Draft NPF is to a large extent centred on urban Ireland, with cogent policies and targets for our cities and large towns. Notwithstanding, the plight of the many smaller towns and villages is well recognised and acknowledged in the draft. The inclusion of overall targets of brownfield development is fully supported. However, the targets may be difficult to achieve without the inclusion of focused and time limited incentives that can act as a stimulus to kick start the delivery of new/modern residential development on a national basis.

The issue of one off housing is addressed in the draft with a provision that in rural areas under urban influence new housing would be considered within the context of

'demonstrable economic need' as a core test. In this regard the Draft may benefit from broadening this to give equal weighting to 'social need' and to provide guidance on how this should be interpreted and implemented.

Whilst Gaeltacht regions are not exclusively rural, they are an integral and significant part of rural Ireland and the NPF should afford special recognition to the value propositions that they present within an economic, social and cultural context. The Gaeltacht Act (2012) provides that some 26 Local Plans will be prepared by local community organisations across the different Gaeltacht districts working in close collaboration and on a partnership basis with key public sector stakeholders, including the Local Authority sector. The NPF should confirm that these plans shall be informed by the NPF and RSES and shall deliver a range of development interventions and investment measures that shall deliver viable and sustainable development, in economic, socioeconomic and sociolinguistic terms, of the Gaeltacht communities that are consistent with the NPF and RSES.

Regional Ask: that the NPF provide for the following:

(i) Targeted and time limited incentives are introduced to kick start brownfield development on a national basis.

(ii) Sufficient clarity for the sustainable development of rural housing, incorporating both demonstrable economic and social need as a core consideration in rural areas under urban influence.

(iii) Forestry development is fully integrated with other competing and complementary land uses.

(iv) Recognise the value proposition of our Gaeltacht Regions and that the Local Plans provided for under the Gaeltacht Act shall be a delivery mechanism for the NPF and RSES.

9. *Intra-Regional & Cross Border*

Projects:

Due to the geography of the NWRA, distance from the Greater Dublin Area, and links with communities across the border, there are a number of key projects which, if supported would influence not alone intra-regional dynamics but bring substantial benefit to communities on a cross border basis, and would

result in a much enhanced tourist product offer as well as aiding inter-regional co-operation and strengthening effective national development.

In addition to the Ten-T road network within the Region (See Map P.6), there are a number of key strategic projects which the Assembly view as being of long term strategic value to the West and Border, for a variety of reasons, these include the following:

- **Ireland West Airport Knock (IWAK)** – In the first half of 2017, the Government announced the approval of IWAK as a Strategic Development Zone (SDZ). The funding of this project, by the Department, and Mayo County Council, and the advancement of the SDZ, which will lie along the Atlantic Economic Corridor (N-17), and could provide a key employment centre and industrial hub for a large hinterland, encompassing East Mayo, North Galway, County Sligo, and North Roscommon.
- **The Western Rail Corridor** – The WRC runs for 234km from Sligo to Limerick. The case for the reopening of the line to serve the North West outlines the multiple social, tourism, business

(including freight) benefits which would accrue from the re-opening of the line. The route if reopened would link 3 City Regions, as set out in the Draft NPF (Galway, Limerick, Cork) 4 major towns (formerly Hubs, as per the NSS) of Ballina, Castlebar, Tuam and Ennis, as well as connecting by rail 3 International Airports, 3 universities, and 4 IT (Institute's of Technology) Campuses.

- **The Ulster Canal** – The Ulster Canal is 74km in length and is now the last remaining unrestored waterway in Ireland. The Ulster Canal would extend access from the Shannon Erne Waterway to Lough Neagh, and onto the Bann River, and if brought back into use would open up large area's of Fermanagh, Cavan, Monaghan, and Armagh. The project has the capacity to act as a catalyst to aid the regeneration of a number of towns across the central border region.
- **Role of Regions Port & the Galway Port upgrade** – The NWRA region is currently underserved in terms of commercial port facilities, and this has necessitated a

dependence on utilization of Dublin and Belfast which are a considerable remove from the Western seaboard. In order to harness the marine potential of our Region, a number of key port facilities should be targeted for upgrade including Galway Port, Killybegs, and Ross a Mhil. The benefits of these upgrade projects including growth in Marine Tourism, Marine Food, reduced travel time for Regional exporters, as well as potential in upscaling enterprises (employment) with a Marine / BioTech background.

- **Connacht / Ulster TU Alliance** – The Assembly acknowledge the Connacht Ulster Tech. University Alliance has recently moved to stage 2 in the re-designation process of the 3 Institutes of Technology in the Region to a combined TU status. The overall aim of the Alliance is to enhance the educational offer to students with the region, and to continue to strengthen the range of programmes offered to students, and grow its role as a significant player in attracting innovation, enterprise, and investment into the Northern & Western counties of Ireland. The facilitation, and

support of this initiative should continue to be a priority in a whole of Government approach to enhancing Regional Development.

Regional Ask: That a whole of Government approach, which is cross departmental, and reflected in the NPF co-ordinates the delivery of a number of key regional projects, which will serve as a stimulus to grow, and enhance the region (and beyond) as a whole.