



## Comhairle Contae Mhaigh Eo

Áras an Chontae, Caisleán an Bharraigh, Contae Mhaigh Eo.  
Teileafón: (094) 9024444 Facs: (094) 9023937

Do Thag. / Your Ref.

Ár dTag. / Our Ref.

7<sup>th</sup> November 2017

NPF Submissions  
Forward Planning Section  
Department of Housing Planning & Local Government  
Custom House,  
Dublin D01 W6X0

RE: Mayo County Council's Submission on the draft Ireland 2040 - Our Plan: National Planning Framework

A Chara,

Enclosed is Mayo County Council's Submission on the draft Ireland 2040 – Our Plan: National Planning Framework.

Yours Sincerely

  
Iain Douglas  
A/ Director of Services



# MAYO COUNTY COUNCIL

**Submission in Response**

**To**

**Ireland 2040 - Our Plan  
National Planning Framework**



**November 7<sup>th</sup> 2017**

## 1.0 Introduction

Mayo County Council's first submission to the National Planning Framework (NPF) consultation process concluded with the following statement:

*Mayo County Council considers that the prime outcome for the county from the NPF is that it will outline a path by which the full potential of Mayo, in terms of its population, its towns and villages, rural communities, natural resources, cultural and natural heritage and infrastructure can be developed to the fullest extent possible. In order to do so the NPF must create the optimal conditions for delivering economic, social, cultural and physical development throughout the county in a manner that is consistent with the principles of sustainability so that everyone, irrespective of where they live in Mayo have equal opportunities to share in the benefits of such development in a high-quality environment.*

This first submission was intended to help inform the NPF of Mayo County Council's views of how the potential of Mayo could be realised in response to the Issues and Choices document released as part of the first phase of consultation for the NPF. It is considered that these views are not reflected in the NPF and the draft Ireland-2040 framework does not outline a path or clear strategy for Mayo or indeed any other county in the Northern and Western Region.

It is acknowledged that the NPF is a broad strategy and not a 'wish list' and that such a strategy involves making hard choices, however, it is submitted that the strategy outlined in the draft framework, a key element of which is the reliance on five city regions to drive development throughout the regions, is likely to further exacerbate regional (and sub-regional) disparity with potential negative outcomes for the county.

This submission reiterates and elaborates on specific issues/concerns that were raised in Mayo County Council's previous submission, particularly with regard to the focus on city regions, infrastructure, the renewable energy and the marine which it is considered have not been addressed in the draft NPF.

## 2.0 Lack of Spatial Dimension

One of the principle purposes of preparing the NPF, as set out in the Issues and Choices documents was to "...*co-ordinate all of ...specific departmental or 'sectoral' areas into an overall strategy. This will allow shared national development goals, ....., to be more broadly considered.*"

It is considered that although Ireland 2040 sets out goals and objectives for various departmental or 'sectoral' areas, it does not give sufficient direction or guidance with regard to how different parts of the country might play a strategic role in respect of various sectors, playing on their particular strength, experience and acquired expertise in certain areas, which would enable more effective regional development.

It is accepted the NPF is a high-level policy document, with a focus on spatial development issues and choices which are National in focus and scale. However, there is a lack of a spatial dimension in the sense that outside of the five cities, the level of detail for many objectives expressed throughout the framework is generic and there is a lack of guidance on how each of the regions should develop beyond the cities. There is a notable absence of maps throughout the NPF document, (apart from Map 2.1- Configuration of the Regional Assemblies in Ireland) which should reflect the spatial priorities of the NPF.

Mayo County Council considers this lack of detail/spatial dimension weakens the potential effectiveness of the NPF, and should be addressed throughout the strategy, particularly in terms of providing direction for Regional Spatial and Economic Strategies (RSEs) which are required to apply the principles of the framework in more detail at the regional level.

### **3.0 Regional Imbalance**

One of the stated key elements of Ireland 2040 is to provide *“A more effective balance of growth between Ireland’s three regions – the Northern and Western; Southern; and Eastern and Midland (which includes Dublin), whereby the Northern and Western and Southern Regions combined should grow at broadly comparable rates to the Eastern and Midland, as opposed to a continuation of the current long-term trend whereby the rest of country has lagged behind the increasing rate of population, jobs and housing provision rates in Dublin and the wider Eastern and Midland area.”*

Ireland 2040 targets the growth of five cities as economic drivers for the Regions as follows; Dublin for the Eastern and Midlands Regions; Cork, Limerick and Waterford for the Southern Region; and Galway for the Northern and Western Region. The framework also refers to the importance of Belfast and Derry in Northern Ireland as economic drivers, particularly Derry for the northerly part of the Northern and Western Region. It is anticipated that the growth of these cities will influence further development of the Northern and Western Region and the Southern Region as a counter balance to the dominance of Dublin, and the Eastern and Midlands Region.

The NPF has provided no proof/data that city regions equate with effective regional development, as evidenced by the lack of influence that Galway has had on the socio-economic development of Mayo and the Northern and Western Region as a whole as envisioned by the National Spatial Strategy.

#### **Influence of all city regions is not equal**

In theory, designating Galway City as a driver for economic development for the Northern and Western Region could achieve a more effective balance between regions if, as the strategy assumes, Galway’s influence is equally effective in all directions. However, this is a flawed assumption as it over-estimates the sphere of influence of the Galway city region in terms of significant areas of the Northern and Western Region.

Galway city is located at the most southern end of the Northern and Western Region, almost on the border of the Southern Region. Galway has a greater inter-connectivity to the Southern and Eastern and Midland Region than to the Northern and Western Region. This connectivity of Galway towards the south is even recognised in the draft framework itself which states ‘The City is located at the point on the Atlantic Economic Corridor from where the influence of Ireland’s southern Atlantic cities (Cork and Limerick) extends northwards’. To the east, Galway is connected to Dublin by motorway via the M6/M4 and by rail via the Galway/Dublin rail line. To the south, Galway is connected to Limerick by motorway via the M6/M18 and by rail via the Galway to Limerick rail line. Connectivity north, by motorway extends to Tuam via the M6/M17. Further connectivity throughout the Northern and Western Region is via an inadequate national, regional and local road network and there are no active rail links northwards from Galway.

In terms of the cities influences in addressing the current imbalance between regions; Galway city’s influence south intersects with Limerick city’s influence north, providing a catalyst for

growth along this corridor, which is primarily in the Southern Region. Limerick city's influence south intersects with Cork city's influence north, providing a catalyst for growth along this corridor, which is entirely within the Southern Region. Cork city's influence east intersects with Waterford city's influence west, providing a catalyst for growth along this corridor, again located entirely within the Southern Region.

Galway city's influence north as an economic driver into the Northern and Western Region becomes less effective north of Tuam due to an inadequate provision of infrastructure and poor interconnectivity. The distance between Galway and Derry cities limits the influence that both cities exert on the Northern and Western Region, as their influences north and south are dissipating rather than intersecting (as per the cities in the other regions), resulting in a weak growth corridor. Therefore, there is a need to develop an additional urban centre of scale between Galway and Derry to act as an economic driver for those areas of the Northern and Western Region which are clearly outside the zone of influence of a designated city region.

#### Need for additional centre of scale

Sligo already plays a significant role in the urban structure of the north-west and due to its location could act as an effective driver for the region. Mayo County Council suggests that the key position of Sligo be addressed in the NPF in terms of its role as a key city in the Northern and Western Region (Sligo City Region future population of 50,000 persons). The NPF should also commit to guaranteeing adequate infrastructure is prioritised for this purpose including improved connectivity, thereby ensuring that Sligo city acts as a necessary economic driver for the Northern and Western Region similar to the roles of Galway, Limerick, Cork and Waterford as economic drivers for the areas within their zones of influence.

Travel times between Mayo towns and Galway, Sligo and Athlone (the nearest urban centres of scale) were submitted which show shorter travel times between the three largest Mayo towns and Sligo than to Galway -

#### Current (2017) Travel Times

	<i>Galway</i>	<i>Sligo</i>	<i>Athlone</i>
<i>Belmullet</i>	<i>2hr 19mins (via N84)</i>	<i>1hr 45mins (via N59)</i>	<i>2hr 38mins (via N5)</i>
<i>Castlebar</i>	<i>1hr 17mins (via N84)</i>	<i>1hr 8mins (via N5 and N17)</i>	<i>1hr 38mins (via N5 and N61)</i>
<i>Westport</i>	<i>1hr 21mins (via R330, R334 and N84)</i>	<i>1hr 23mins (via N5 and N17)</i>	<i>1hr 55mins (via N5)</i>
<i>Ballina</i>	<i>1hr 49mins (via N84)</i>	<i>52 mins (via N59)</i>	<i>1hr 48mins (via N5 and N61)</i>

Unfortunately, the draft framework has maintained its focus on the four cities and it is submitted that this will lead to further regional and sub-regional imbalance in Mayo and the north-west. The framework seeks to address the 'significantly weaker urban structure in the north and west of Ireland' by allocating additional population growth targets for towns of 10,000 + population – 'overall targeted population growth for large towns with >10,000 population in 2016 within the Northern and Western Regional Assembly area, should generally be 40%, or almost twice projected national average growth.' However, the simple allocation of additional population growth targets will not address the need for a single urban centre of scale capable of driving economic development for large areas of the Northern and Western region.

It is essential that this fundamental structural weakness in the NPF, which could potentially exacerbate regional imbalance, is addressed through the NPF rather than the RSESs.

Without the development of an additional city between Galway and Derry, the overall strategy is flawed as it constitutes a framework whereby the Southern Region combined with County Galway will grow at broadly comparable rates to the Eastern and Midland Region. Therefore by 2040, there will be a greater imbalance between the Northern and Western Region (outside of the Galway city region) and the remainder of the country.

#### 4.0 Urban Hierarchy - Larger Towns

Mayo County Council contends that it is essential that the NPF establishes a role for the larger towns in the regions. It should facilitate the development of a real urban hierarchy emphasising the development of the cities and larger towns within city(ies) region, including Castlebar, Ballina and Westport, the larger towns in Mayo. In the context of Mayo, given its size and geographical characteristics, and its location in relation to Galway and Sligo, the combined strengths of the three towns of Castlebar, Ballina and Westport should be harnessed to drive development from within the county as **highly connected** 'complimentary urban centres' or a similar concept rather than relying primarily on an 'influencing' effect from outside the county. This model should be used throughout the NPF to ensure that large areas of the Country are not omitted as a result of focusing just on the City Region concept, thus establishing a National Planning Framework and not a Five City Planning Framework.

The draft framework states that there is 'scope for potential growth' in all large towns, but determination of this 'scope' will be decided through the RSESs. National Policy Objective 2b references 'a number of large regionally distributed towns'. Therefore, it is not entirely clear which towns over 10,000 will be targeted in the RSESs. It is considered appropriate that the National Planning Framework, rather than the RSESs should identify such towns and also objectives setting out defined roles for these towns, taking account of strengths/opportunities together with a commitment to provide the necessary infrastructure provision to ensure proper connectivity between these towns and the six cities of Dublin, Waterford, Cork, Limerick, Galway and Sligo. Such connectivity and infrastructure provision would be detailed in the relevant RSESs for each Regional Assembly area.

#### 5.0 Infrastructure

Mayo County reiterates its' concerns regarding connectivity to and from the County. The draft NPF identifies key infrastructural projects which are geared primarily to enhancing connectivity between the regional cities and the north-west<sup>1</sup>. In order for Mayo to benefit and indeed contribute to "*effective regional development*", under either the linear city or Atlantic Economic Corridor scenario, and given the fact that most of the county and the three main towns are;

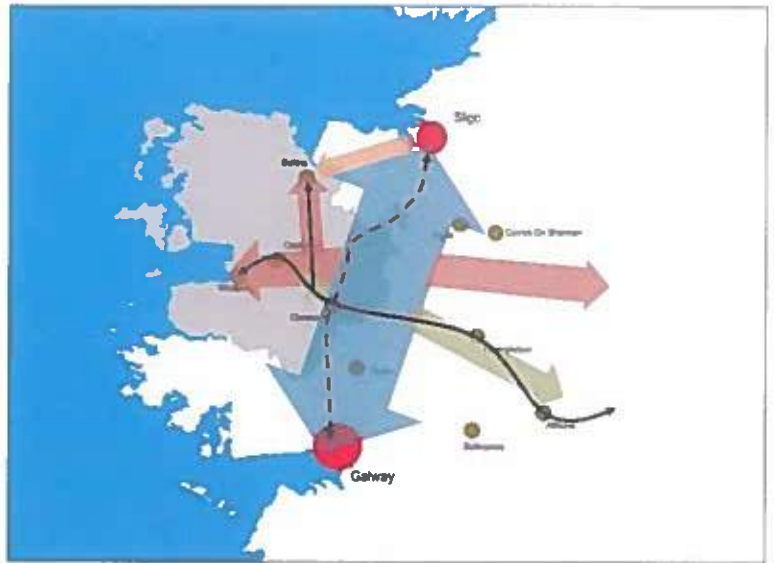
- (a) in the interstice between Galway, Sligo and Athlone or
- (b) off the central spine of an Atlantic Corridor,

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<sup>1</sup> i.e. the cross border north-west city region focused on Derry City

then **accessibility**, of Mayo's goods and services, both inwards & outwards to the regional cities and eastwards to Dublin and equally important, access within the county, is the critical, single-most factor to allow Mayo to unlock its potential, thrive and play a significant role in the future spatial development of the region and country.

The draft National Planning Framework gives a greater emphasis to the Dublin-Belfast Economic Corridor, with a specific section and National Policy Objective, then to the importance of the Atlantic Economic Corridor. Mayo County Council considers that the strengthening and establishment of the Atlantic Economic Corridor should be given greater emphasis due to the existing



imbalance between the eastern and western parts of the Country. Specific reference should be made to the Atlantic Economic Corridor from Cork to Letterkenny / Derry, with a specific National Policy included in the NPF for its development as an economic driver for the region.

### Roads

Mayo County Council has identified the following critical road infrastructure projects which are in need of accelerated advancement in order to achieve the expectations of the Atlantic Economic Corridor as an effective counter-balance to the Dublin region which included:

- Upgrading of the entirety of the N5 to a Ten-T 'High Quality road';
- Upgrading of the N17 to a Ten-T 'High Quality road' standard/motorway;
- N26/N58 linking Ballina and the north-west of the county to the N5
- Upgrade N60 from Castlebar to Claremorris (critical link to the N17 (Atlantic Economic Corridor))

Reference is made in the draft NPF to improve northern sections of the N17 where required, in the context of improving accessibility to the north-west. This is welcomed although it is not clear what level of improvement will be involved or when it will occur

### Rail

The draft NPF focuses principally on the road network as the primary mode of transport in addressing the issues of mobility and connectivity between the cities. This will have adverse implications not merely for connectivity to/from/within the Northern and Western region, particularly areas outside the zone of the city regions, but also in terms of national policy objectives in the framework with regard to climate change obligations and sustainability issues. (A key theme of the Draft NPF is 'Sustainable Mobility' as part of a National Strategic Outcome.)

Ireland 2040 acknowledges that the main intercity rail network also plays a key role in offering sustainable travel alternatives. However, the national rail network outside of Dublin is barely referenced in the document other than stating that *'There is potential to develop the existing*

*good quality rail links between Dublin and Belfast and Cork into an island rail spine through line speed and service enhancements’.*

The currently disused state owned Western Rail Corridor, could play a strategic role in terms of strengthening the functionality of the Atlantic Economic Corridor concept as an effective counter-balance to the Dublin region, whilst simultaneously acting as a sustainable response towards meeting national and international obligations with regard to climate change issues.

#### **Ireland West Airport Knock Strategic Zone**

Ireland West Airport Knock (IWA Knock) is of strategic importance particularly in terms of the Northern and Western Region and this role should be recognised in the NPF. The designation of the Ireland West Airport Knock Strategic Development Zone (SDZ) in May 2017 post-dated the launch of Ireland 2040; Issues and Choices. The future role of this SDZ, particularly in relation to synergies within the Galway City region and the greater Northern and Western Region as a whole was therefore not alluded to in the draft NPF.

It is submitted that Ireland 2040 should articulate a National Policy Objective in support of the strategic role of Ireland West Airport Knock both in its role as major infrastructure on the Atlantic Economic Corridor (the M17 from Gort to Tuam has improved accessibility to Galway City and the south with reduced travelling times) with connectivity to the UK and EU and in its role as a SDZ within the Northern and Western Region.

#### **Delay in investment in infrastructure outside of cities**

Ireland 2040 states that implementing the Ireland 2040 Framework will be guided by targeting a number of strategic outcomes including that of ‘Enhanced Regional Accessibility’. However, the framework also suggests that delivery of such enhanced regional accessibility will be delayed until the core areas in key cities and urban areas have been mobilised following which *‘the next priority is to enhance accessibility between key urban centres of population and their regions such as the key cities of Cork and Limerick and through the Atlantic Economic Corridor to Galway as well as access to the larger urban centres in the North-West’* (not the same as the Northern and Western Region). The reason given for this is that ‘Investment in connectivity first without urban consolidation measures will likely worsen the current trends towards sprawl.’

This approach is the opposite to that suggested by Mayo County Council, i.e. that the NPF incorporate the principle of ‘preferential status’ or ‘priority investment status’ to counties such as Mayo and other counties which lag behind in terms of economic development. The NPF approach will have negative impacts on areas outside of the key cities, including towns and villages and rural communities as it will restrict growth of key rural based sectors. For example, the sustainable development of renewable energy/marine based resources, which are generally located in areas of poor infrastructure, will continue to be delayed/hampered due to infrastructural deficiencies.

#### **6.0 Renewable Energy/Marine Potential**

In terms of renewable energy and marine potential, Mayo is already striving towards becoming a world class hub for sustainable energy production and export and offers enormous potential to fuel not only local or national demand but to export energy also due to its expansive coastline and optimum conditions for wind/wave and tidal energy.



For example, the Atlantic Marine Energy Test Site (AMETS), is currently being developed off Annagh Head, west of Belmullet. The test site forms part of Ireland's Ocean Energy Strategy (SEAI) and is being developed in accordance with the national Offshore Renewable Energy Development Plan (OREDP) 2014. The test site will connect to the national grid.

Mayo is strategically positioned approximately mid-way between the furthest point north of the island and the furthest point south of the island. Additionally, it also has the spatial disposition and advantage of being located at a central coastal location within the Northern and Western Region.

Ireland's maritime sovereign jurisdiction covers in the region of 1 million square kilometres. However, in terms of coastal infrastructure, the draft NPF does not reflect the need to develop infrastructure that would serve the full extent of this 'territory' as it concentrates primarily on the strengthening of infrastructure on the southern part of the island which will only serve a small geographical extent of this 'territory'. Therefore, from a centrality and potential connectivity perspective, it is considered that a more strategic role must be identified and articulated for Mayo in the NPF.

The lack of a spatial dimension in the draft NPF outside of the five cities will have adverse implications for sectors such as renewable energy and the marine which have a strong regional dimension. The NPF does not consider the potential of some regions to play a greater strategic role in the renewable energy sector. Therefore, Mayo County Council considers that the NPF should identify Mayo as a **National Priority Location (Strategic Energy Zone)** as referenced in the Issues and Choices Paper) for renewable energy investment due to its pivotal location along the western coastline, its significant renewable energy resources and sector specific innovation skills.

## 7.0 Context of Marine Development and the NPF

The NPF acknowledges the importance of marine development for Ireland's future. It highlights the important relationship between terrestrial spatial planning and marine planning. However, it falls extremely short in terms of a rigorous and holistic treatment of the potential of the marine as a key driver of the country's development and the accommodations and consequences therein to 2040.

Mayo County Council welcome the fact that the National Planning Framework acknowledges the role of the marine as articulated in 'Harnessing our Oceans Wealth' and that it dedicates a chapter to Realising our Island and Marine Potential.

However, in addition to the specific issues raised in paragraph 6.0 above which are of particular relevance in terms of Mayo's potential and the marine, it is considered that it does not go far enough, based on the overwhelming potential that has clearly been identified in general and in particular with regard to the following five areas:

### **Engagement with the sea and marine proofing the NPF**

Engagement with the sea does not appear to be intrinsic to the NPF in the sense that there are no National Strategic Outcomes directly related to the marine. While the importance of the marine is acknowledged this is not integrated into the framework and is left to the subsequent RSEs process. The NPF should offer some direction to the various levels of the planning hierarchy with respect to National and Regional Objectives.

### **Growth dynamics within the NPF**

The NPF sets out the relative growth dynamic that will take place between the Dublin Region the other metropolitan areas and effective rural development. While the Framework mentions the growth targets in relation to the marine, it does not explore how the marine growth will sit or affect the relative dynamic and no analysis or provision is made for this within the framework. In the context of the marine, effective development should identify how and where landside development may take place to complement marine potential, such detail would provide focus for all stakeholders and not inhibit potential that may arise particularly in relation to peripheral coastal communities.

### **The proposed co-publishing of the NPF and the Ten-year National Investment Plan in the absence of a Marine Plan**

The fact that the framework and the ten-year National Investment Plan are being published in the absence of a marine plan severely impacts on the coordination and co-dependency of the NPF and the marine agenda. On the publication of the Marine Plan a mechanism should be put in place to evaluate both. Leaving this process to the RSEs may result in unintended consequences. Finalisation of the Marine Plan should automatically trigger a review of the NPF and subsequent plans in the hierarchy. A similar operation should also occur when proposals for Brexit are finalised. Such mechanisms would copper-fasten the NPF as a living document.

### **The proposed sequencing of the role out of the plan and the implications for marine development and coastal communities**

The sequencing of the NPF priorities - the Dublin Metropolitan Area, the City Metropolitan Areas, Regional Connectedness and then the Atlantic Economic Area, may have consequences for innovation, new departures and as yet undetermined marine driven growth areas. Accommodation should be made within the framework for such development, particularly within the context of the Atlantic Economic Corridor which more accurately reflects the linear interaction of the Atlantic Coastline, the marine sector and Wild Atlantic Way with economic development.

### **Brexit**

Brexit will have clear implications for marine development and how that development will manifest itself along our coastline. It would be prudent at this stage within the context of the NPF to carry out scenario analysis and have high level options outlined to give strategic guidance to lower level plans.

## **8.0 Conclusion**

As work on finalising the NPF draws to a close, this final round of consultation will feed into the process of drawing up a framework which should be capable of guiding 'effective regional development' throughout Ireland. Towards this end, it is requested that the issues raised in this submission are addressed in the final Ireland 2040 document so that the outcome for Mayo as envisaged in the previous submission and reiterated in the opening paragraph of this submission can be achieved.