



Mullingar Chamber of Commerce
26 Lough Sheever Corporate Park
Robinstown
Mullingar
Co Westmeath

“Mullingar is Ready”

Thursday 30th March 2017

Dear Minister Coveney,

Mullingar Chamber of Commerce, as one of the three key contributors to the Midlands Gateway Chamber is committed to the process of Ireland 2040 Our Plan - National Planning Framework.

In our view, the location of Mullingar town holds considerable strategic importance both at regional and National level, juxtaposed between at the outer reaches of the Greater Dublin area (one hour from Dublin International Airport), the Midlands and the West / North-Western region.

Over the past 15 years we have worked closely with our Midlands neighbours in Tullamore and Athlone in the establishment of the Gateway region under the National Spatial Strategy. This was in our view an excellent foundation for future development of Mullingar and the wider Midlands as an “accommodation” to the Dublin region.

We like to pride ourselves on our strong business acumen, our favourable natural environment and our unquestionable infrastructural capacity to support the planned sustainable growth of a modern post-Brexit Irish economy.

The Crossroads of Ireland

We envisage an Ireland of the future which is criss-crossed by key motorway and light-rail routes from East to West, from North West to South East, South West to North East, an outer-ring road of Dublin and all intersecting through Mullingar and the Midlands. We are ambitious in our outlook for the future of Mullingar town and it’s regional environs. We believe the work of the region’s Chambers of Commerce and the local authorities of the Midlands over the past 15 years has created the environment and the extra space for our town to now step up to the serious capacity challenges facing Dublin and our wider community, into the next 20 years in a new post-Brexit era. Our town boasts IDA Business Parks in excess of 30 Hectares.



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The Chamber of Commerce in Mullingar has now grown to a point today where it has ample experience and track record on many levels to welcome foreign direct investment as well as indigenous Irish employers to locate their operations here at our quality location in the Midlands. Our Lakelands region boasts clean water, clean air and clean energy positioning us the “greenfield” location from which to do business with sustainable, renewable, energy high on our priority list.

From our linkages and cooperation with our local authorities, to our Nationally regarded Industrial Conferences, to our achievement of the Purple Flag standard for our town, Mullingar has not been found wanting.

Our long-term strategy for this region is and always was to support our rural communities in achieving their full potential in terms of economic development. This will also require a sustained focus from policy makers over the coming years if we are to prove our effectiveness. Vibrant, strong regions such as Mullingar and the Midlands become the perfect fit for Dublin.

Over the past ten years Ireland has needed a strong Dublin to pull us out of the economic crisis, now Dublin needs a strong “regional” Ireland with towns like Mullingar fit to continue with that growth and development. Yes many people living in Mullingar have commuted to Dublin for employment over the past 15 years. But that can and should now become a “two-way” street into the next 20 years, where people living in the Greater Dublin area will commute to Mullingar as a quality, modern connected location for high-end employment and quality of life.

Mullingar Chamber would like to strongly endorse the submission of the Midlands Gateway Chamber written by Henk Van Der Kamp MScEng, FIPI, MIEI attached herewith. Please be assured that the Chamber is also willing and available to facilitate any public consultation meetings and channels should it be required by your Department during the remainder of the NPF consultation process.

Yours sincerely

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**Submission on behalf of the Midlands Gateway Chamber of Commerce to the
National Planning Framework consultation phase.**

March 2017

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1 Introduction

The Midlands Gateway Chamber (MGC) was set up in 2007 as a requirement of the Midlands Gateway regional strategy under the National Spatial Strategy (NSS). The MGC is a formal Chamber Committee made up of members of the Chambers of Commerce of Athlone, Tullamore and Mullingar and enjoys close links to the local authorities and public bodies both in Offaly and Westmeath. The MGC represents the broad regional views of these Midlands entities. The MGC in its current form will remain in existence for the duration of the NSS, however it plans to adapt to a new structure at the end of that strategy and the new NPF is in place in 2020.

This submission addresses the question of how best to position the Midlands Gateway as designated in the National Spatial Strategy, in a new National Planning Framework.

2 How Many Gateways?

The NSS identified eight gateway cities outside Dublin.¹ The consultation document makes it clear that this is considered too many and that the National Planning Framework should include a smaller number of gateways. The document also suggests that the level of settlements that is placed below the capital city comprises only the four cities: Cork, Limerick, Galway and Waterford.

...“Ireland’s regional cities appear to offer significant potential to be the focal point to drive growth and development in their regions. The regional cities are all major centres of employment, third-level education and healthcare and are accessible to the motorway network and other communications infrastructure such as airports and ports. Beyond the city catchments, there is a network of towns that can play a similar role.

Given the scale and important regional roles played by the four cities, all have significant potential to complement Dublin, to absorb some of the strain that the Capital has been subject to in terms of accommodating growth in employment, housing need and infrastructural requirements and drive their wider regions, which may also require cities to work in collaboration with each other and/or in conjunction with other towns, to borrow and share strengths.

At the tier below the cities, there are a number of towns which, due to their level of service provision and extensive catchments, serve an important role for those areas that fall outside the reach and influence of the cities. In some cases, they can complement the role of the city. However, lessons from the past suggest that if we continue to focus on multiple towns, this will continue to undermine the performance and potential of our cities and ultimately the wider regions.”²

The consultation document therefore suggests that the NPF may reduce the number of gateway cities outside Dublin from the current eight to only four: Cork, Limerick, Galway, Waterford. However this would mean that there would be no gateway city above the line Dublin-Galway. As this is unlikely to be acceptable, it is probable that the number of gateway cities outside Dublin would be reduced from the current eight to a proposed five. See table 1.

¹ *The National Spatial Strategy 2002-2020*, Dept. of the Environment and Local Government, Map 2, p. 58.

² *Ireland 2040 – Our Plan - Issues and Choices - Executive Summary*, February 2017, p. 8.

	NSS	NPF
No. of Gateways excl. Dublin	8	5
Tier 1	Dublin	Dublin
Tier 2	Cork, Limerick, Galway, Waterford, Dundalk, Sligo, Letterkenny Athlone/Tullamore/Mullingar	Cork, Limerick, Galway, Waterford, Letterkenny?

Table 1 – A Reduced Number of Gateways

3 A Midlands Gateway Linked to the Capital

During the period of the NSS Dublin has effectively remained a monocentric city with an increasing degree of urban sprawl resulting in large commuting flows into the city from the outlying urban areas. This is notwithstanding the fact that significant numbers of jobs have been created outside the city centre of the Capital, e.g. Dublin Airport, City West and Sandyford. However, this pattern of development has essentially been characteristic of the ‘edge city’ rather than a ‘polycentric city’. As a consequence of congestion and competition for scarce development land, housing has tended to follow a pattern of urban sprawl extending to different parts of the city region. The negative consequences of this spatial pattern of development are mentioned quite clearly in the consultation document. See for example the following:

...”Under the Business As Usual scenario, the current lop-sided pattern of development of the State will continue, which in the longer term will be neither beneficial to Dublin nor the Country as a whole.”³

While the consultation document suggests to address this overheating of the Dublin region by creating a ‘regional complement to Dublin’,⁴ the suggested concept in this submission is to instead link the Midlands gateway to Dublin. The NSS concept of gateways was to *counterbalance* Dublin growth. An alternative concept presented here is to *accommodate* rather than counterbalance Dublin growth. Such a concept emphasises the quality of life that the Midlands gateway can offer and more sustainable transport (less congestion), as well as locations for FDI. Effectively by linking the Midlands Gateway to the Capital, Dublin can change from the existing monocentric city to a polycentric urban network.

This submission therefore concentrates on a genuinely new concept that differs from the Balanced Regional Development (BRD) idea of the NSS that is generally seen as having ‘failed’. A new concept is proposed as outlined in this submission. In short, this submission proposes a different type of gateway that would be unique to the Midlands location. Dublin could be planned as a polycentric city by designating the Midlands Gateway as a gateway linked to the Capital.

4 The Polycentric City Concept

The NSS included suggestions for polycentric development. It is important to distinguish between inter-regional and intra-regional polycentric development where the latter is *...”characterised by several urban centres that are connected to each other and not dominated by one dominant centre.”⁵* Most notably the Athlone-

³ *Ireland 2040 – Our Plan - Issues and Choices - Executive Summary*, February 2017, p. 8.

⁴ *Ireland 2040 – Our Plan - Issues and Choices - Executive Summary*, February 2017, p. 9.

⁵ Johansson, Mats, *Polycentric Urban Structures in Sweden – Conditions and Prospects*, in: *Facing ESPON*. Editor Christer Bengs. Stockholm 2002. (Nordregio Report 2002:1), pp. 99-118.

Tullamore-Mullingar gateway was presented as an intra-regional 'polycentric gateway' where the three settlements together would make up the population size necessary for a gateway designation. It is important to analyse the background to the polycentric concept.

The polycentric concept was introduced in the European Spatial Development Perspective (ESDP) published in 1999.⁶ In this publication the Polycentric Spatial Development concept was advocated for the following reasons:

- To ensure regionally balanced development
- To provide a new perspective for peripheral areas
- To link hinterlands to internationally accessible metropolitan regions
- To provide opportunities for a graduated settlement structure
- To allow for complementarity between settlements.

The polycentric model in an Irish context provides the following advantages

- Keep settlements compact but recognise the need for scale
- Keep settlements compact but recognise mobility patterns
- Keep settlements compact but include the rural zone in the overall urban network
- Maximise accessibility provided by transport networks.

Objective 1: Keep settlements compact but recognise the need for scale

Compact settlements have long been advocated as a sustainable model of urban form. For the NPF the important focus is on the contribution to a reduction in energy demands for transport and heating. However, cities need to have a certain scale to be effective. By combining a number of settlements together, the scale can be achieved (critical mass) while maintaining the compact footprint of each individual settlement.

Objective 2: Keep settlements compact but recognise mobility patterns

Modern economy and society requires mobility. The EU White Paper on Transport⁷ has acknowledged that reducing mobility is not an option. However, mobility can be captured in more sustainable transport systems. In spatial patterns characterised as urban sprawl, transport movements tend to be criss-cross travel patterns that are difficult to serve by public transport systems. In contrast, public transport can effectively link compact settlements with each other in a polycentric spatial development pattern.

Objective 3: Include rural zone between settlements

In addition to the high density urban land uses that one finds in modern European cities, cities also require less intensely used areas. This is necessary to serve demands of the city population in terms of: leisure & recreation, but also to achieve water retention to adapt to climate change, green infrastructure to retain biodiversity, renewable energy production incl. solar parks. In the monocentric city this is provided in the rural hinterland but in the polycentric city these less developed rural zones can be accommodated in the areas between the settlements but which form part of the overall polycentric city.

⁶ *European Spatial Development Perspective*, agreed at the Informal Council of Ministers responsible for Spatial Planning in Potsdam, May 1999.

⁷ *White Paper Roadmap To A Single European Transport Area – Towards A Competitive And Resource Efficient Transport System*, European Commission, Brussels 2011.

Objective 4: Maximise connectivity and access.

Monocentric cities face the problem of serving an increasingly congested city from a single access point whereas a polycentric city can link the external access through secondary transport networks to the various settlements within the network.

5 Travel Times to Key Locations in the Region

The consultation document asks the following question: ...”*What do we need to do to make best use of existing infrastructure?*”⁸ The M4 and M6 motorways plus rail connections linking Dublin with Athlone, Mullingar and Tullamore, provide underused infrastructure in proximity to the Capital. This is clear from traffic volume statistics. Table 2 illustrates the lack of traffic congestion and the availability of both road and rail capacity in a Midlands Gateway that is linked to the Capital. The M6 at Kinnegad has traffic volumes that are less than one tenth of those experience on the M50.

Road	Location	AADT
M50	Red Cow J9/J10	125708
N4	Lucan J3/J4	78425
M1	Swords N J4/J5	55098
M4	Mullingar J16/J17	17713
M6	Kinnegad E J4/J5	11748

*Table 2 – Transport Infrastructure Capacity*⁹

The proximity of the Midlands Gateway to the Capital can also be illustrated with the relatively short travel times to key locations. Relatively short travel times are helped by the reliability of such travel times made possible as a result of the general lack of traffic congestion on the national roads M4, M6 and also N52. For example, the travel time from Dublin airport to Mullingar is one hour, while the travel time from Maynooth University to Mullingar is similar to the travel time from Maynooth to Dublin City Centre.

6 Long Distance Commuting

The percentage of workers whose commuting times are more than one hour is significantly higher in counties Kildare, Offaly and Westmeath than it is in the Dublin region. Significant commuting times above the national average therefore occur outside the Dublin region. See table 3. This suggests that currently a concentration of jobs exists in the Dublin region compared to the location of the labour force. A mismatch between jobs in the Dublin region and households in the outer areas can be corrected relatively easily if jobs are allowed to locate in the outer areas rather than forcing all households to live in the Dublin region. This will also contribute to more efficient use of transport infrastructure capacity by facilitating two way commuting flows.

A Midlands Gateway that is linked to the Capital can be effectively marketed internationally as providing good locations for inward investment accessible to a large labour market and key infrastructure such as Dublin Airport and Maynooth University, while avoiding the congestion aspects manifested in the form of traffic congestions and high house prices. Unlike Cork, Limerick or Galway, the Midlands Gateway can

⁸ *Ireland 2040 – Our Plan - Issues and Choices - Executive Summary*, February 2017, p. 17.

⁹ Source: www.nratrafficdata.ie

be effectively marketed by IDA Ireland as a 'Greater Dublin Area' based location while it has its own infrastructure as well such as Athlone IT.

Area	Total workers	No. commuting more than one hour	Percentage commuting > 1 hour
GDA	517800	44493	8.6
Kildare	82142	12652	15.4
Westmeath	30221	3971	13.1
Offaly	25577	3091	12.1
State	1695074	152465	9.0

Table 3 – Commuting Times¹⁰

7 The Importance of the Residential Environment

Depending on size of household and position in the life cycle (young family vs middle aged) housing demands vary significantly. Such demands extend not only to the type of housing unit (e.g. apartment vs. house with garden) but also the residential environment within which the dwelling unit is located (e.g. urban vs suburban). Important efforts to create sustainability are focused on high density city centre environments where concentrations of jobs can be offered and good quality public transport exists. However, equal attention is justified for locating development outside the central zones but near to public transport nodes or multi/modal interchanges.

The consultation document asks the following question: ...*"How can the rural parts of Ireland close to urban areas be protected from development pressures that are likely to arise to accommodate further population growth?"*¹¹ It seems critical to keep the smaller settlements at greater distance of Dublin both compact in size and attractive in terms of character. The Midlands Gateway can accommodate the pressures for residential development.

The Midlands Gateway as a linked gateway to the capital can offer an alternative lifestyle in addition to (and in contrast with) the more urban lifestyle of Dublin City (see box: 'midlands vs docklands'). International research shows that there are many types of residential environments that can be distinguished but with the two most popular and dominant ones being: (a) city centre high density living and (b) more suburban green dominant living. The poor quality environment of suburban sprawl provides neither of these types of residential environments as the benefits that high density urban living brings are not achieved (e.g. access to large range of services) while it also does not offer the quality environment that comes with good access to the countryside.

In this regard the qualities of the various settlements within the Midlands Gateway plus the rural area in between the settlements is an asset. See table 4 for examples of settlements that can be accommodated in the overall linked gateway concept:

¹⁰ Census 2011, Profile 10 Door to Door, CSO, 2012, table 6, p. 42.

¹¹ Ireland 2040 – Our Plan - Issues and Choices - Executive Summary, February 2017, p. 11.

Small Settlement	Population 2011 ¹²	Character
Clara	3242	Attractive service town. Railway station. Attractive street pattern. River and nearby nature (Clara Bog).
Moate	2731	Attractive service town. Railway station potential. Removal of through traffic presents opportunities.
Kilbeggan	1199	Attractive service town. Historic quality with tourism potential. Attractive public realm with proximity to river.
Tyrrelspass	506	Local service town. Attractive village green. Removal of through traffic presents opportunities.
Ballymore	433	Rural centre. Rich archaeology. Potential for strengthening urban form. Picturesque landscape.

Table 4 – Role of Small Settlements in Midlands Gateway

Midlands vs Docklands

There is a risk that sustainable residential development is considered synonymous with high density urban development. However, while high density urban living is increasingly popular and reflects the general trend of movements towards the cities, a significant number of households prefer a residential environment where the (real or perceived) disadvantages of city centre urban living are avoided and the attractions of easy access to recreational amenities can be accommodated. This difference in priorities is also affected by the stage a household is in its lifecycle. It is therefore inappropriate to focus on one type of residential environment alone. Not every family is willing to live in an apartment even if the quality of the apartment can be improved from standards in the past. The key to successful cities is that different environments can be provided, allowing for choice. However, all environments need to be high quality. This can be achieved by good design (sustainable neighbourhoods) and good transport accessibility. The Midlands Gateway can make an important contribution to the demand for such high quality residential environments which the suburbs of Dublin fail to provide.

Access for people in the Greater Dublin Area to experience rural resources is also important. The Midlands Gateway concept as a linked Gateway to Dublin provides the potential to achieve this need. Farming, tourism, ancient archaeology, Slieve Blooms, Lough Boora, The Greenway, Clara Bog, Ireland's Ancient East sites and the Lakelands are all examples of important rural resources. This provides a need that is reflected as follows in the consultation document: ...*"The benefits of green infrastructure or ecosystem services can be harnessed to create an attractive environment to encourage businesses and inward investment; more places for people to access nature, outdoor recreation or social interaction or physical activity*

¹² Census 2011, Population Classified by Area, CSO, April 2012.

by providing quality, linked green or 'blue' (water-related) spaces for walking, cycling and other physical activity and creating a sense of place and local distinctiveness."¹³

8 Transport Infrastructure as Carrier for Urban Form

Good locations on the transport infrastructure can be used for urban development in a polycentric concept even if these locations may be outside existing urban centres. The Midlands is at a natural intersection of transport route paths across Ireland as well as a potential orbital outer route around the capital. Within a polycentric gateway concept where the Midlands is linked to the Capital, such locations can be focus points for well planned locations for employment and residential development. See table 5 for a number of such possible locations within the region.

Location	Main Town	Road	Nature
Moate	Athlone	M6	Potential multi-modal rail/road
Mullingar	Mullingar	N4/N52	Road
Kinnegad W	Mullingar	M4	Multi-modal rail/road
Kilbeggan	Tullamore	M6	Road
Enfield		M4	Multi-modal rail/road

Table 5: Transport Locations

Development at nodes under the polycentric model such as those listed in table 5 has a number of advantages: less congestion than in monocentric model, retention of well protected landscapes between the nodes and potential for short travel to work distances if people can live near the nodes.

9 Governance

Historic business, administrative and social links between Athlone, Tullamore and Mullingar are already well established across existing regional bodies.

10 Conclusion

- **The NPF may reduce the number of gateway cities outside Dublin from the current eight to only four or five.**
- **In contrast to the NSS concept of gateways to counterbalance Dublin growth the submission presents an alternative of the Midland gateway city to accommodate rather than counterbalance Dublin growth.**
- **By designating the Midlands Gateway as a gateway linked to the Capital, Dublin can be planned as a polycentric city. Dublin has effectively remained a monocentric city with large commuting flows into the city from the outlying urban areas. The polycentric model in an Irish context can achieve a number of objectives incl. compact settlements, more sustainable travel patterns, protection of rural areas, and connectivity for economic development.**
- **This submission does not specify the nature of the link which can take different forms, e.g. a linked polycentric gateway, a new town for Dublin overspill, or genuinely as part of the GDA.**

¹³ Ireland 2040 – Our Plan - Issues and Choices - Executive Summary, February 2017, p. 15.

- Existing transport infrastructure that links Dublin with Athlone, Mullingar and Tullamore provides underused infrastructure in proximity to the Capital with relatively short travel times to key locations incl. Dublin Airport and Maynooth University.
- By allowing jobs to be located in the Midlands Gateway a reduction in commuting times can be achieved as well as more sustainable two way commuting patterns.
- The Midlands Gateway as a linked gateway to the capital can offer an alternative residential environment in contrast to the more urban lifestyle of Dublin City: 'Midlands vs Docklands'. This is presented as an important alternative although not replacing the need for densification in the central urban areas.
- The Midlands Gateway concept as a linked Gateway to Dublin provides the potential to achieve access for people in the Greater Dublin Area to experience rural resources and a continued viability of small settlements dispersed within the Midlands gateway area.
- The Midlands Gateway provides good locations on the transport infrastructure that can be used for urban development in a polycentric concept. Some of these locations provide scope for rail/road multi-modal integration and interchange.
- Existing strong linkages between the different parts of the region and between public and private bodies, suggests that Governance of a Midlands Gateway will be strong.
- Notwithstanding this submission, the Midlands Gateway Chamber supports other submissions made to the National Planning Framework that call for the principal towns in the Midland Region; Athlone, Tullamore and Mullingar to be supported.

Appendix A - International examples

Amsterdam-Almere axis

Almere was designed and built in the Netherlands in the 1970s as a new town to accommodate the residential overspill from the city of Amsterdam. Increasingly, Almere is becoming a self contained urban centre (in itself designed as a polycentric city comprising of three separate settlements). However, in its strategic development Almere is now very much focused on the linkages with Amsterdam and can be seen as forming a polycentric urban region together with Amsterdam. While the distance between the two centres is shorter than is the case in the Midland Gateway (ca. 34 kms) the principle of good rail and road access between the two cities is similar. Also the importance of the international airport Schiphol is a characteristic that is similar to the concept of a Midlands Gateway linked to the Capital.

Copenhagen-Malmo axis

Malmo is a second city in the urban hierarchy of Sweden (Stockholm being the capital). However, with the construction of the bridge and tunnel project linking Sweden and Denmark, Malmo is now firmly linked to the capital city of Denmark: Copenhagen. With a distance of ca. 41 km between both cities, the network is again different in that the cities are closer together than in the case of the Midlands Gateway but again the principle is the same of a large city (Copenhagen) linked to a much smaller city (Malmo) and together forming a polycentric urban network. Like in the case of the Netherlands, here also the international airport at Kastrup plays a significant role in the success of the urban network.