



# SLIGO

**REGIONAL GROWTH CENTRE  
FOR THE NORTH WEST**

**IRELAND 2040 - OUR PLAN**

**Second Submission to the National Planning  
Framework from the**

**SLIGO ECONOMIC FORUM**

November 2017





# Introduction

This submission to The Draft National Planning Framework 2040 has been prepared in a collaborative manner by the Sligo Economic Forum (SEF) comprising of representatives of Sligo County Council, IDA Ireland, Enterprise Ireland, Sligo Institute of Technology, Sligo Chamber of Commerce, Fáilte Ireland, St Angela's College, and the Local Enterprise Office.

The National Planning Framework is about setting a vision for a strategic framework for achieving sustainable and effective regional development in Ireland. Within this policy framework, the contention of the SEF is that Sligo should remain as the identified urban centre to be developed in an accelerated manner, to drive and sustain regional and rural development in the North West Region.

The Draft National Planning Framework 2040 was considered by the members of Sligo Economic Forum at a meeting on Friday 20th of October 2017. A summary of the comments arising out of this meeting are set out below:

The SEF found the draft NPF document to:

- a) Be very top level and aspirational with most of the tangible objectives and targets delegated to the Regional Assemblies.
- b) Have objectives that are stated in generalities that will be difficult to evaluate over the period of the Framework
- c) Contain objectives that do not have clear KPI's
- d) Contain no details on the priorities in the 10 year investment plan.

In 2002, the National Spatial Strategy (NSS) recognised Sligo's potential to promote regional development in the North-West. Sligo's Gateway designation was intended to stimulate the achievement of critical mass in terms of population and economic activity. For 15 years Sligo has been ready to perform its Gateway functions, but the prevailing economic circumstances prevented the implementation of the NSS regional development strategy.

The expert Review Panel commissioned by Government in 2013 to review the NSS strongly recommended that any future national spatial strategy should focus on Gateways only and favoured continuing with each of the proposed Gateways with the exception of the linked midlands Gateway.

Although the Gateway vision has not yet been realised, Sligo's capacity and willingness to grow have sustained and strengthened.

An integral part of the National Planning Framework is the recognition that successful countries have vibrant cities at key locations driving economic growth within their regions. This submission reinforces Sligo's vision, capacity and ambition to be the regional growth centre for the North-West. The SEF would like to put forward the following in support of Sligo as the leading growth centre for the North West:

#### 1) Balanced Regional Development:

The case for balanced regional development is required to achieve a balanced, sustainable and ambitious economy based on sustaining and growing enterprise and innovation as well as growing strong communities.

It is completely unacceptable to effectively propose, (by omitting Sligo and the North West region in the draft NPF) that there will be no targeted fast-track growth above the Dublin-Galway line between now and 2043. Pursuing such a policy would hugely disadvantage this region relative to Dublin and the other cities identified for priority attention and would not be in the best interests of the country as a whole. The investment made to date in Sligo to facilitate very significant growth e.g. sewerage, water, zoning of land banks etc is already available whilst similar infrastructure would have to be constructed elsewhere".

2) In support of a balanced regional development objective, the north-west is being prioritised by EI and IDA for new start-ups, company expansions and FDI to both sustain the existing employment base in engineering and pharma, and to renew and evolve the employment base through the development of technology-based services and related digital sectors.

3) The strategic importance of the location of Sligo as a centre of regional support and critical mass of economic activity (including agri-business) to counteract the impact of Brexit, with the related need to have the necessary infrastructure and connectivity to the major cities of Dublin and Galway '

4) Sligo located centrally in the north-west region is recognized by the bordering counties of Leitrim, Mayo and Roscommon as the primary urban centre in the region and will as a result be able to fulfill and further expand on its potential as a regional growth driver for the surrounding catchment as outlined in page 30 of the draft NPT document. This potential as a growth driver for the region and surrounding catchments will be further enhanced by prioritising improved connectivity and accessibility to the north-west between the other growth centres on key east-west and north-south routes (as outlined on page 44 of the draft NPF document.)

5) **SLIGO IS READY.**





# Sligo's Growth Target is Achievable

The Department indicates that the NPF will be a tool to assist in the achievement of more effective regional development. In order to ensure that positive outcomes arising from national growth can be shared by people throughout Ireland, the potential of all areas will need to be realised, relative to their capacity for sustainable development.

In this regard, Sligo Economic Forum welcomes the population growth target of 40% included for Sligo and is confident that this growth rate is achievable if the necessary investment is provided for in the upcoming National Investment Plan. Sligo Economic Forum is concerned, however, that the National Investment Plan will not adequately prioritise funding to Sligo without the explicit recognition of Sligo's importance within the North West region in the National Planning Framework.

Furthermore, a large proportion of funding under the Smart Growth Initiative should also be directed to urban regeneration projects in designated large regional towns (like Sligo) without the need to compete with other non-designated urban settlements.





## Sligo's position in the North-West not recognised

Sligo is the most obvious large regional town that should be supported without reservations by the NPF and the National Investment Plan to achieve its growth potential in terms of employment and population growth, in parallel with infrastructural development and regeneration of the town centre. It is not acceptable that no explicit reference to Sligo's regional significance is made in the Draft Plan.

In contrast, Dundalk is the only former NSS Gateway nominated in the Draft NPF for the purpose of "developing the critical mass of the Newry-Dundalk area to compete with other large cities" (Fig. 7.2 on page 103 in Section 7.3 Working together for economic advantage).

Given that Dundalk is a large town located in the Dublin's catchment area, it is not clear why it receives explicit support for growth while Sligo, which is outside the catchment area of any city, is not mentioned in a similar context.



# PROMOTION OF CROSS-BORDER PARTNERSHIP NOT EVIDENT

The importance of promoting cross border collaboration and partnership is now even more critical in the context of Brexit. The NPF must therefore be aligned with the objectives set out in the Regional Development Strategy (RDS) 2035 for Northern Ireland. While the Draft NPF includes reference to the Dublin-Belfast Economic Corridor and the North-West Strategic Growth Partnership, the importance of the central border region is totally disregarded. The RDS 2035 recognises the economic significance of this area in designating Enniskillen as the 'south-west gateway with strategic links to Sligo'. The RDS 2035 states that 'Enniskillen has an inter-regional gateway function being only 1 hour drive from Sligo on the main transport route. There are opportunities for Enniskillen and Sligo to work together to provide services on a cross border basis.'

The NPF must therefore include appropriate provisions to take advantage of these opportunities for cross-border partnership particularly in addressing the challenges to be posed by Brexit. For example, the upgrade of the N16 should be included as one of the national strategic outcomes in enhancing regional accessibility and to ensure consistency with the RDS 2035 which designates this route as a Key Transport Corridor.





# SEA PREFERRED OPTION NOT SUPPORTED BY DETAILS

In terms of Strategic Environmental Assessment, Section 10.3 Alternatives to Business as Usual (p. 147) indicates that the preferred option was “Option 2 – Regional Effectiveness and Settlement Diversity”, which is said to “acknowledge the economic importance of Dublin whilst ensuring growth across the regions and in other urban centres”.

It is considered that this option is not fully reflected in the details of the Draft NPF, which fails to identify and quantify urban areas for targeted growth outside Dublin and the other four cities. It also fails to indicate the manner in which future population and housing will be directed into settlements as opposed to the open countryside





# BALANCE VS. COMPETITION IN REGIONAL DEVELOPMENT

There is no mention of “balanced regional development” anywhere in the Draft NPF. A possible interpretation of this omission would be that the Government is not pursuing this type of regional development.

This interpretation seems to be supported by a statement in Section 9.3 National Investment Plan (p. 130) that “There is broad consensus that public infrastructure investment is an important aspect of a competitive location policy, impacting on an economy’s or region’s cost structure and competitiveness. Research also highlights the scope for public capital investment to influence the regional dispersion of economic activity and influence the rate at which regions accumulate various productive factors, particularly infrastructure”.

The above statement is not followed by any commitment to “influence the regional dispersion of economic activity” in a manner that would reduce the regional imbalance in the country. In the northwest, Sligo and the surrounding catchments should be the focus of a prioritised commitment to a more equitable distribution of economic activity. We therefore would welcome a commitment in the final NPF for:

- A **Technological University** to be progressed in the North West (Sligo, Letterkenny and GMT) which would enhance the region’s capabilities and economic performance by providing a well educated workforce to support regional economic development.
- Recognise and prioritise **investment in Ireland West Airport Knock (IWAK)** as a regional resource to support economic growth and inward investment.
- The completion of the **Atlantic Economic Corridor** northwards from Galway.
- Priority investment for the North west to be ringfenced for existing transport infrastructure projects currently at planning stage ie **M4,N16 Western Distributor Road, Eastern Bridge**.



## LACK OF COMMITMENT FOR INVESTMENT OUTSIDE DUBLIN .

“Investment” is a term that appears frequently in the Draft NPF, not necessarily in the context of funding projects. At the same time, there is no commitment to investing in large towns outside city catchment areas.

In Chapter 9 Implementation, there is no clear indication regarding the manner in which “national strategic outcomes” will be achieved. Furthermore, it appears that the burden of implementation will fall disproportionately on the Regional Assemblies

The bid-based funding under the Smart Growth Urban and Rural Initiatives will be both uncertain and insufficient to achieve visible progress in enhancing quality of life.

The requirement to participate in competitive bids for “seed funding” under the Smart Growth Urban Initiative will have substantial costs and potentially no benefits for those counties whose per capita income and potential for wealth generation is significantly well below that of the five cities with which they have to compete.



# COMMENTS ON SPECIFIC DETAILS

## National Policy Objective 2b (p. 37)

*"At least half (50%) of future population and jobs growth will be focused in the five Cities and their immediately adjoining suburbs with a target of around two-thirds (66%) to be focused in the cities and their suburbs together with a number of large regionally distributed towns and their environs to be identified through the Regional Spatial and Economic Strategy (RSES) process."*

**This would mean 500,000 additional persons in the five cities with an additional 160,000 in the large regionally distributed towns.**

**An additional 500,000 persons in the five cities would increase the population from 1.6 million in 2016 to 2.1 million in 2040. The NPF sets a population growth target for small towns and rural areas at 15% (Page 65). This would equate to an increase of 360,000 persons thereby increasing the population in these areas to 2.76 million. This would leave just 140,000 persons to be allocated to the larger towns.**

**The NPF indicates that the 2040 national population will be 5.75 million. If 2.1 million is located in the five cities and 2.76 in rural areas, then that remainder of 890,000 will be in the larger towns. This would be a growth of just 122,000 persons in the larger towns from the 2016 figure of 768,000.**

**These discrepancies in the projected population growth in larger towns from 122,000 up to 160,000 would suggest that the NPF targets a population growth somewhere between 16% and 21% for the larger towns. However, Section 3.6 of the Draft NPF targets growth rates for larger towns of between 20% and 40%. Clarification is needed as to what the intention of the Dept is in relation to this.**

### **National Policy Objective 3c (p. 39)**

*"In areas other than the five City and suburban areas of Dublin, Cork, Limerick, Galway and Waterford, at least 30% of all new homes would be delivered within the built-up envelope of existing urban settlements. "*

**How exactly is this going to happen? How can local authorities ensure that house building will take place in urban settlements and not predominantly in rural areas (as is the case at present)?**

### **National Policy Objective 9b (p. 50)**

*"Regional and Local Authorities will identify and quantify locations for employment growth, where suitable, in urban areas generally."*

**This is not sufficient for employment growth. How will new jobs be created in the absence of prioritised and committed investment to provide access and other infrastructure to the identified locations? Agencies such as IDA Ireland, Enterprise Ireland and LEO's would attest to the challenge of attracting new business and existing industries and companies to areas where there has not been adequate investment in infrastructure particularly road and telecommunications infrastructure**

### **National Policy Objective 10 (p. 51)**

*"There will be a presumption in favour of development that encourages more people, jobs and activity within existing urban areas, subject to development meeting appropriate planning standards and achieving targeted growth. "*

**What exactly does "presumption in favour of development..." mean? Planning decisions are expected to be made on an objective basis. Clarification is needed.**

### **National Policy Objective 11 (p. 51)**

*"In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria enabling alternative solutions that seek to achieve well-designed high quality and safe outcomes in order to achieve targeted growth and that protect the environment."*

**What are "performance based criteria"? Will these criteria be defined in future legislation or guidelines?**



## **National Policy Objectives 17a and b (p. 67)**

*"Support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services.*

*Develop a programme for 'new homes in small towns and villages' with local authorities, public infrastructure agencies such as Irish Water and local communities, to provide serviced sites with appropriate infrastructure to attract people to build their own homes and live in small towns and villages. This will initially be developed through pilot 'service sites schemes' in order to provide suitable quality housing solutions to meet the needs of people who might otherwise seek to reside in dispersed housing."*

**Who will provide the interventions, amenities and services? Who will acquire sites? What will be the source of funding? A future "Serviced Sites Scheme"? Who will be the lead partner in the development of the programme?**

## **National Policy Objective 18a (p. 68)**

*"Ensure, in providing for the development of rural housing that a distinction is made between areas under urban influence i.e. areas within the five city regions and the hinterland of towns, and elsewhere and that the standardised EU/OECD definition of a city region shall be applied to identify the urban influence of cities and large towns (>10,000), with influence of smaller (>10,000) towns determined locally."*

**The areas corresponding to the EU/OECD definition (15% workforce commuter catchment areas) should be supplied to local authorities by the Department or the CSO, because neither the map nor the data is available on the CSO website.**

**What will be the criteria for determining the areas under the influence of small towns?**

## **National Policy Objective 29 (p. 80)**

"Local planning, housing, transport/accessibility and leisure policies will be developed with a focus on meeting the needs and opportunities of an ageing population along with the inclusion of specific projections supported by clear proposals in respect of ageing communities as part of the core strategy of city and county development plans."

**Does this mean that future Core Strategies must include specific projections of particular age cohorts, such as over-65s? Should these projections be prepared at County level and/or town level?**

**Clarification is necessary, including the source of funding for "clear proposals in respect of ageing communities".**





## CONCLUSION

The National Planning Framework should set a vision and strategic framework for achieving sustainable and effective regional development in Ireland. Within this policy framework, Sligo should be identified and prioritised as an urban centre to be developed in an accelerated manner to drive and sustain regional and rural development in the North-West region. It is not appropriate for the national policy document to delegate the identification of the regional growth centres to the Regional Assemblies and the Regional Spatial and Economic Strategies.

Furthermore, Sligo Economic Forum asks that the National Investment Plan prioritises funding to Sligo and explicitly recognises Sligo's importance within the North West region in the National Planning Framework.

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