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Ros Comáin
Roscommon
County Council

Oifig an Phríomhfeidmeannaigh
Office of the Chief Executive
Áras an Chontae, Roscommon, F42 VR9B

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

9th November 2017

Re: Ireland 2040 – Our Plan – Draft National Planning Framework.

A Chara,

Please find attached, the submission of Roscommon County Council on 'Ireland 2040 – Our Plan – Draft National Planning Framework'.

The submission sets out the thoughts and opinions of Roscommon County Council on the contents of 'Ireland 2040 – Our Plan – Draft National Planning Framework' and presents an alternative strategy for realising the vision expressed within the Draft National Planning Framework. Roscommon County Council presents this alternative strategy in view of what we collectively perceive to be a general lack of coherence between vision and strategy within the Draft National Planning Framework. It is argued that this alternative strategy will realise the vision expressed in the Draft whilst ensuring a healthy National growth balance and a sustainable future for the North and West Region.

The Elected Members and Executive of Roscommon County Council are united in their dismay at the contents of the Draft National Planning Framework. We, Cathaoirleach, representing the Elected Members of Roscommon County Council and Chief Executive, representing the Executive of Roscommon County Council, undersign as an expression of this consensus.

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Local Enterprise Office

Ireland 2040: National Planning Framework



Submission Of Roscommon County Council On The Draft NPF



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County Council

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Executive Summary

The principles of the Draft National Planning Framework (NPF) – Ireland 2040 and are welcomed by Roscommon County Council, however some of the means for the delivery of these principles should be clarified or amended in the interests of the sustainable development of the North and West Region. Without clarification on a number of the issues set out in this report and amendments called for therein, Roscommon County Council cannot give its support to the National Planning Framework.

A Review of Ireland 2040:

The ‘Enhanced Regional Accessibility’ outcome prioritised within the NPF targets accessibility and infrastructural improvements between the North and West Region and Dublin City, with no recognition of the importance of mutual linkages and infrastructural improvements within the region between Athlone, Roscommon, Galway and Sligo.

When expressed geographically all of the regional cities designated as the centres of future population and employment growth are coastal cities in the lower half of the Island. The Draft NPF has compensated for the absence of a regional city in the midlands and northwest by allocating an additional 15% population growth, over and above that targeted for other regional towns, to Sligo, Letterkenny, Castlebar, Ballina, Tuam and presumably the portion of Athlone falling within County Roscommon (though this has not been explicitly stated). The total additional population growth targeted for the North and West Region accruing from this measure, to be divided among 6 regional centres will be just over 11,000. The effect of this measure will be imperceptible given the population base of these towns (particularly Athlone West).

There is a general lack of clarity as to where Athlone, which has cross-regional status, fits into the national framework with different growth targets apparently applying to the east and west of the town.

The Draft NPF population target of 15% to 2040 for smaller towns, is tantamount to an acceptance of defeat, at National level on the future of the market town in the northwest, and should be reconsidered. This category of settlement has suffered most due to the dominance of the Greater Dublin Area and a more ambitious strategy for re-energising smaller towns in the North and West Region is called for.

An Alternative Model:

In terms of infrastructure provision it is considered more efficient to capitalise on prior investment in the transportation corridor between Dublin and Athlone rather than new infrastructural investment between Dublin and a number of settlements along the west coast. It is recommended that the focus of investment should instead be in regional infrastructure improvement schemes through Athlone, with a focus on improvement of intra regional linkages such as sections of the N4, N5 National Primary Road Schemes and N61, N62 and N63 National Secondary Road Schemes.

It is recommended that the 11,000 targeted population surplus intended to be divided among the 5 settlements of Sligo, Letterkenny, Castlebar, Ballina, Cavan Town, and presumably Athlone West, be allocated, (along with an additional 15,000 population growth target to 2040) towards much higher targeted population growth in a single regional city in the midlands. Athlone is best placed to fulfil this role and it is recommended that Athlone is given the same status as the regional cities of Waterford, Galway, Limerick and Cork.

Athlone is best placed to fulfil the role of regional city in the midlands as it is the largest midland town outside of the Greater Dublin Area with abundant capacity to accommodate new residential and commercial development both east and west of the River Shannon. It has an extremely accessible and linked up settlement, strategically positioned on the major Galway to Dublin transport corridor. It offers all the strategic benefits of being centrally located without the associated high land and property prices.

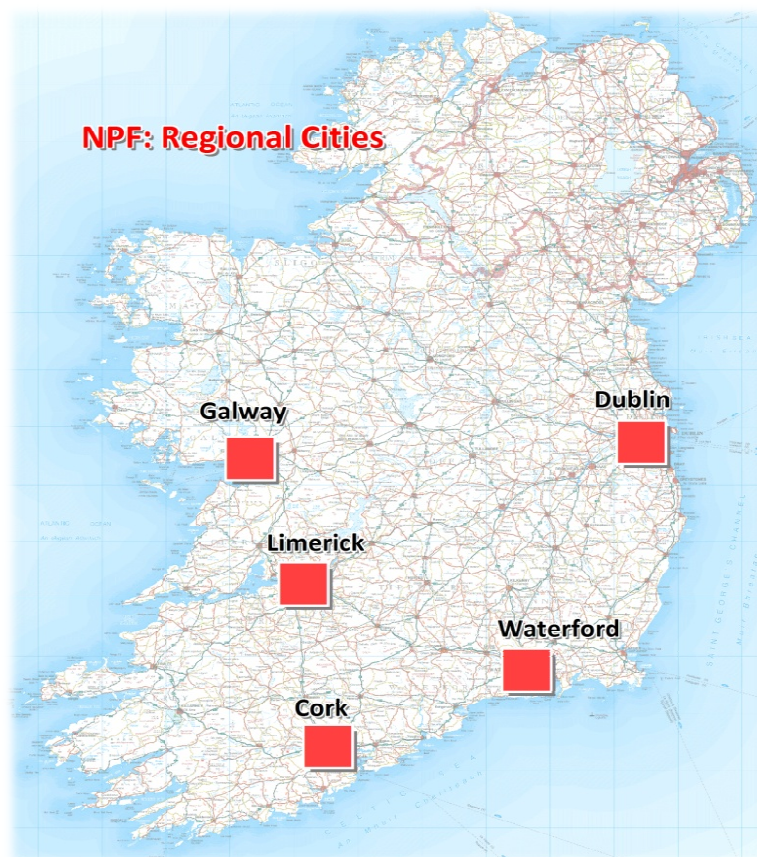
Athlone has a large strategic reserve of industrial and enterprise land use zones both east and west of the Shannon with a very high proportion of its population working or studying in the science and technology fields. As this is a key employment sector in Athlone it is likely that future population growth in Athlone will be sustainable with the city population working and recreating within the city rather than commuting to the east.

A dedicated strategy for smaller towns such as Roscommon Town, Boyle, Castlerea and Ballaghaderreen is required as part of the NPF. The 15% population growth target to 2040 referred to in the NPF is insufficient to ensure the sustainable development and in many instances, survival of these towns. The NPF has a statutory footing and population targets of this nature have the potential to become population allocations which would place undue and unnecessary restrictions on the future development of these towns. It is recommended therefore that reference to this target be removed or that it be significantly increased and targeted, as part of a broader strategy for town centre revitalisation.

Ireland 2040 - A Healthier National Growth Balance?

The principles of the Draft National Planning Framework (NPF) – Ireland 2040 and are welcomed by Roscommon County Council. We are dependent on the success of the NPF in the delivery of its stated objectives and vision and it is in the interests of Roscommon County Council that the NPF succeeds in delivering a healthier national growth balance. The means set out for the delivery of this rebalancing model has, however, called into question, whether the Draft NPF 2040 can deliver a sustainable future for the North and West Region.

It is crucial that the ‘NPF-Ireland 2040’ sets a framework for Ireland rather than the southern and eastern regions of the country, if it is to realise its stated vision. When expressed geographically all of the regional cities designated as the centres of future population and employment growth are coastal cities in the lower half of the Island. Roscommon County Council is in favour of the designation of these cities as growth centres in recognition of the obvious advantage in building upon the existing strengths of our regional cities. A sustainable national growth balance cannot however be delivered solely by building upon existing strengths as irrespective of the success of the regional cities of Cork, Limerick and Galway particularly, unsustainable centrifugal forces¹ will continue to be exerted on the North and West Region by the Greater Dublin Area. The solutions to this can only come from within the North and West Region. There is therefore a clear residual deficiency in the framework. This deficiency cannot be resolved through minor increases in targeted population growth diffused among six regional towns in the North and West Region, and the gradual improvement of radial national road linkages between the parts of the northwest and the M50, as set out in the Draft. Roscommon County Council calls for a more tangible and targeted model for the midlands and northwest of the Country.

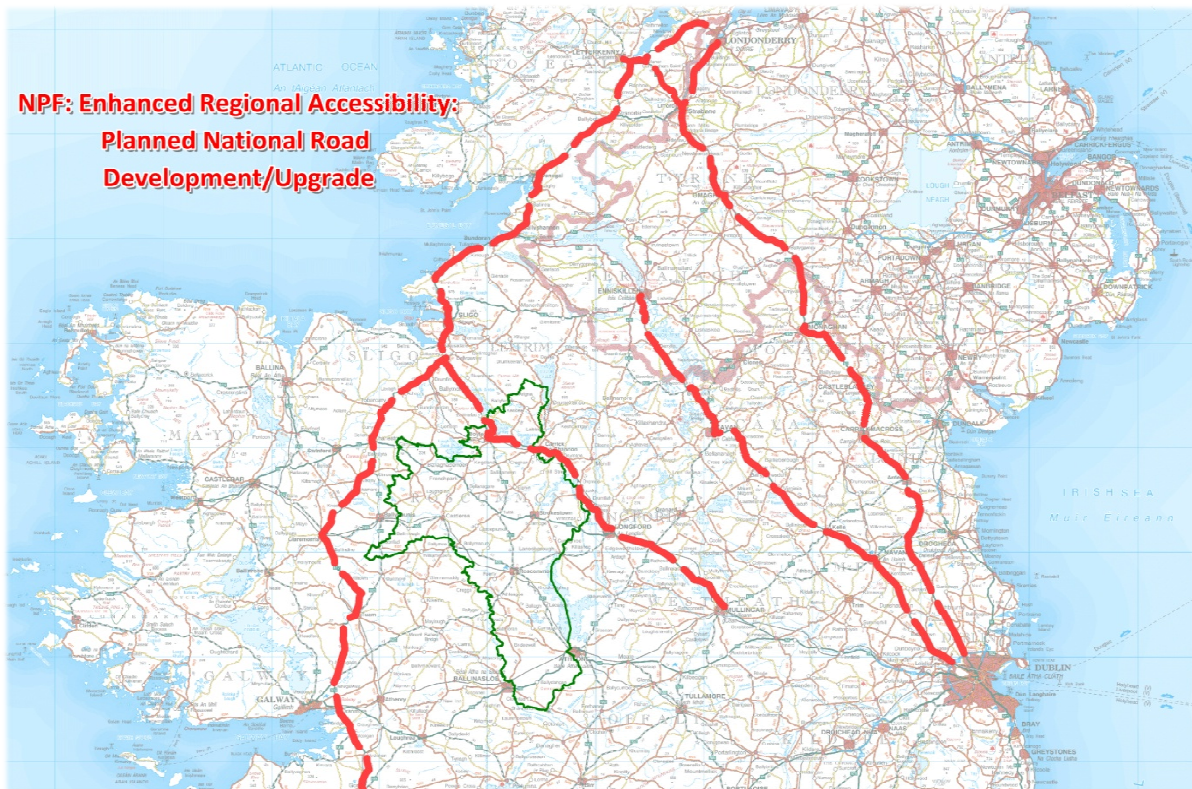


¹ Centrifugal Forces: These are the forces which pull economic migrants and economic development potential from peripheral areas to the Greater Dublin Area.

1.1 National Rebalancing Model and Enhanced Regional Accessibility

The vision set out in Section 1.5 of the Draft NPF, envisions more sustainable choices for the Ireland of 2040 with *'sustainable patterns of living and working'*. Section 9.3 of the Draft NPF 2040 sets out its National Strategic Outcomes (NSO's), to be considered in developing the National Investment Plan for 2018-2027. First in the sequence of NSO's is a 'Compact, Smart Growth' objective stemming from National Strategic Objectives 6 and 10 of the Draft NPF. Second in the sequence of these NSO's is 'Enhanced Regional Accessibility' with further development of connectivity between centres of population of scale (see Section 9.3 of the NPF) triggered *'once smart growth objectives are being achieved'*. It is noted that the focus of this *enhanced regional accessibility* will be on mutual accessibility *between* the 4 cities separate from Dublin (i.e. between each other and not Dublin), but that the focus will be on accessibility *to* the Northern and Western Region *from* Dublin. This approach is reinforced by the schedule of planned regional accessibility programmes, which are entirely road transportation based, and involve the completion of the radial road network centred on Dublin City.

It is difficult to reconcile how this approach is aligned with the above vision and principles of NSO 2 (a) of the NPF which requires that *'jobs and population growth will generally be aligned to occur in the same functional area'*. This approach clearly makes Dublin more accessible by road from parts of the midlands and northwest, rather than allowing settlements to build their own critical mass and mutual linkages within the North and West Region. This approach would intensify the centrifugal pressures being exerted upon the North and West Region by the Greater Dublin Area (GDA), which have hindered the sustainable development of both regions. Indeed it is these very pressures which have ultimately prompted the need for a National Planning Framework.



This approach would, in view of the comparatively weaker employment base of many towns in the North and West Region, broaden the pull of the Greater Dublin Area for commuters leading to the emergence of increasingly distant commuter settlements along the radial road network around Dublin.

Furthermore, it would appear that planned regional connectivity will occur sequentially pending (undefined) progress on the achievement of Smart Growth Objectives. In view of the fact that there has been a significantly greater upsurge in construction activity in the east of the country in recent years than the North and West Region, it appears, almost certain that in practice there will a greater demand for, development in east than in the west. The consequence of this process will be greater opportunities for development which could be regarded as progress on the 'Smart Growth' NSO, triggering extensions to the radial national road network from the east towards more peripheral locations.

The impact of this will be the incremental pulling of successively distant settlements on the radial road network into the commuter belt of the GDA. As larger settlements around Dublin meet their population growth target of 20-25%, when population growth will presumably have to be stemmed to give effect to the NPF rebalancing model, pressure will be exerted on new, successively distant settlements from the Greater Dublin Area, along the radial road network, leading to calls for the improvement of this network. This process would have an enormous exacerbating effect on the already negative centrifugal pull of population and investment to the east and the centripetal forces² generating commuting, traffic congestion and unsustainable housing pressures.

1.2 The Draft NPF: A Sustainable Framework for the Midlands and Northwest?

The Draft NPF 2040 rebalancing model involves inter alia, rebalancing population and economic growth towards regional cities in the west and southwest of the country and this approach was a key aspect of the model put forward by Roscommon County Council in our recent pre-draft submission on the NPF. As highlighted in our submission however, this model would, by itself be incomplete, in that it would fail to address the socio-economic pressures discussed above exerted upon the structurally and economically weaker midlands and northwest of the country.

Roscommon County Council has argued that this matter can only be tackled effectively through the designation of a regional city in the midlands. This centre must have sufficient critical mass to provide a realistic counter balancing force to the dominance of the GDA and that which is envisaged to emerge in the regional cities. Even with the emergence of a strong Galway-Limerick-Cork city region in the southwest, the existing pressures which draw economic opportunities and migrants from the midlands and northwest to the east would continue to hinder the peripheral midlands and northwest and only the designation of a midland regional city would reduce the need to travel from the midlands and northwest, to the Greater Dublin Area for work and recreation.

This argument is reinforced by the report of an Expert Group 'Review of the National Spatial Strategy: Views of the Expert Group' (2014) which was intended to inform discussion in the NPF. The group recommended in January 2014 as part of their review that they favoured; "continuing with each of the National Gateways adopted in the first NSS with the exception of the linked Midlands Gateway", and specifically recommended that Athlone alone be given the status of the Midland Gateway or city:

"We propose instead that Athlone be recognised as the Midland Gateway, because the linked centres approach has not been sufficiently established, diffuses focus, and has proven to be of little substance or value in practice. To a great extent, the gateways are self-selecting (and this is the case with Athlone) as they have the largest populations, the best transport connections, the highest levels of economic activity and the critical mass of key services such as education and health. They are the key to regional and National success".

² Centripetal Forces: These are the often negative consequences of urbanisation whereby housing pressures and traffic congestion emerge in rural areas around cities and large urban areas.

In the absence of a designated regional city in Athlone, as recommended by the Expert Group, and the obvious imbalances which would continue to prevail between the east and the north-west under this model; Section 3.6 of the Draft NPF 2040, set out an alternative model as follows:

“in recognition of the weaker urban structure of the north and west of Ireland, overall targeted population growth for larger towns with >10,000 population in 2016 within the North and Western Regional Assembly area, should generally be 40%”. While there is provision for individual settlements to develop beyond targeted rates, it is envisaged that “growth must be balanced between them”.

In the first instance a broad percentage based approach masks the vast disparity between the east and west of the country in terms of population base and urban structure. The practical effect of this percentage based approach using existing population will, (outside of the regional cities) be the allocation of more than twice the population growth of the top 10 population centres of in the east (71,816) to that of the top 10 centres in the west (34,684). This measure will benefit only 5 settlements outside of Galway and presumably a portion of Athlone (Athlone West), though further clarification is required on how the provisions of the NPF would apply to Athlone.

The ultimate effect of this growth will be an increased population allocation of 11,330, distributed between Letterkenny, Sligo, Castlebar, Cavan Town, Ballina and Athlone West, over and above that applied to other towns with populations exceeding 10,000 (see below):

>10k Population Towns in North & West	2016 Population	Applying 25% South and East Allocation	Applying 40% North and West Allocation	Difference
Athlone West	3,913	978	1,565	587
Letterkenny	19,274	4,819	7,710	2,891
Sligo	19,199	4,800	7,680	2,880
Castlebar	12,068	3,017	4,827	1,810
Cavan	10,914	2,729	4,366	1,637
Ballina	10,171	2,543	4,068	1,525
		18,886	30,216	11,330

These settlements would essentially therefore have become ‘mini growth centres’. The average population growth allocation however (15% over and above that of other towns with populations exceeding 10,000), would be very small and amount to an average of 2000 people per settlement over the 22 year duration of the NPF.

This would appear to be an opportunity lost for the establishment of a sustainable population and employment centre for the midlands and northwest. The measures proposed as part of the NPF model for the North and West Region, while well intentioned will be ineffective in achieving the critical mass of population and employment growth necessary to sustain the patterns of living and working envisioned by the Draft NPF in the North and West Region. In addition, and given the economies of scale concerned, there would arise a serious question as to whether jobs would follow targeted population growth at the ratio envisaged in the NPF at these economies of scale.

It is difficult to reconcile, in view of the general consensus that a major weakness of the predecessor to the NPF (The National Spatial Strategy) was the approach to spread growth potential too thinly, why the potential for the establishment of a centre of employment for the midlands and northwest should be diluted in this manner.

A Call For Clarity on Athlone



Athlone is the largest urban centre in the midlands, and in the North and West Region, next to Galway City. It is already a key employment hub for both the midlands and northwest. Its successes are based on its unique attributes, such as accessibility, quality of life as well as educational and employment opportunities.

It is the only town in the midlands which has the characteristics of a sustainable city region with a comparatively more balanced population living closer to where they work than other large midland towns which have been subject to a far greater extent to the centripetal housing pressures and commuting patterns exerted by the Dublin Metropolitan area.

It is also the only large regional town which has cross-regional status and under the various provisions of the Draft NPF, differing growth targets prevail for Athlone East (25% population growth target) and Athlone West (40% population growth target) with the implications of this status on the future development of Athlone highly unclear. It should not be left to the Regional Spatial and Economic Strategies or an individual Urban Area Plan to attempt to resolve these issues, whilst also ensuring consistency with the NPF.

Roscommon County Council therefore calls for clarification within the NPF on the role of Athlone due to the special interregional issues which prevail and the unique characteristics of the settlement. It is considered appropriate that at a minimum growth targets and a schedule of growth enablers for Athlone be included in the manner applied to the 5 regional cities to address the special case of Athlone.

The Draft NPF And A Future For Rural Towns

2.1 Review of Draft NPF Population Targets

The pre-draft submission of Roscommon County Council has highlighted that towns outside the orbit of major cities will increasingly stagnate and decline, whilst those within will develop in an unsustainable way, without interventions at both national and local level.

The submission also pointed to the fact that there are few commonalities between settlements below the level of the regional cities, and that the sustainable development of each will require a myriad of different and often contrasting approaches difficult to plan for at national level.

Section 4.3 of the Draft NPF sets out that:

“Ireland 2040 sets an overall population growth target of 15% for small towns of less than 10,000 people in rural areas in each of the three Regional Assembly areas to 2040”

While National Policy Objective (NPO) 14 tempers this language somewhat referring to *“a targeted average rate of 15%”*, the broad application of such measures, particularly in the case of the North and West Region appear unnecessary and unwarranted. The allocation of such broad targets to all settlements ignores vast differences which exist between smaller settlements across the country and this recommended approach will stifle the ambition of local communities and future growth of many towns.

While Roscommon County Council understands the logic of applying this approach to smaller towns within the Greater Dublin Area and within the immediate commuting hinterlands of regional cities which have been subject to unprecedented population growth, there appears no benefit to the application of such targets to smaller settlements not experiencing these pressures. In the case of the North and West Region it would appear that there is a far greater likelihood that there could be unintended, negative consequences, rather than any positive consequences associated with the broad use of this target in the NPF. The NPF has a statutory footing and the associated Regional Spatial and Economic Strategies, to be prepared at regional level and core strategies to be prepared at local level must set a framework for the allocation of population growth in a manner consistent with the National Policy Objectives of the NPF leading to such percentage growth targets becoming the direct basis for population allocations.

This approach frustrates the ambition of urban communities focused on delivering a sustainable future for their towns in the North and West Region. The generally plan led and sustainable urban growth of Westport Town in County Mayo between 1986 and 2006 led to population growth in this 20 year period of over 58%. Population targets such as that set out in the Draft NPF would have hindered this largely sustainable progress.

The settlement of Boyle, in north County Roscommon, has seen population growth of approximately 17% in the past 20 years whilst experiencing severe town centre economic decline, and a target of 15% population growth for the next 20 years would be a critical blow to the ambitions of local communities striving to re-imagine and revitalise the town. A population target of 15% to 2040, whilst useful in ensuring a healthier urban growth balance in city hinterlands, is, when applied to many towns in the North and West Region, tantamount to an acceptance of defeat, at National level on the future of the market town in the northwest, and should be reconsidered.

2.2 Review of Draft NPF Urban Structure Targets

The pre-draft submission of Roscommon County Council set out that a successful model for the spatial development of Ireland must address the dominance of suburban living as a lifestyle choice and explore options for making town and city centre living a more attractive alternative. The targeted pattern of development for compact smart growth as set out in Table 2.1 of the Draft NPF, whereby 30% of the population growth allocated to towns would be brownfield/infill with the remainder falling to greenfield development, is more appropriate in settlements in the greater Dublin Area. These settlements were small villages in the mid-20th century, have small town centres with little capacity for brownfield development and very large suburban populations.

An entirely different target is necessary for towns in the northwest which have vastly more town centre capacity which has not been sufficiently accounted for in the NPF. With few exceptions towns in the midlands, west and northwest, are in serious decline and the flight of population from town centres, has both undermined their socio-economic success and created vast town centre capacity for population growth. Applying a 15% growth allocation in the same manner as towns in Greater Dublin Area in conjunction with the 30% targeted towards brownfield will have almost no impact in terms of reversing this decline.

We can exemplify this point with reference to Castlerea, a market town in County Roscommon with an urban population of almost 2000. Castlerea has a traditional core town centre which spans approximately 20 Hectares, including public realm. By comparison Swords, County Dublin has a traditional town core approximately one-quarter the area of that of Castlerea but an urban population approximately 20 times that of Castlerea. The NPF targets suggest that the targeted population growth for the 22 year period of the NPF should be 300 people for an urban population of 2000 people, with only 90 targeted towards brownfield lands. Across the board targets of this nature ignore the capacity resource of town centres in the north-west particularly and would ultimately undermine any attempts to make town centre living an attractive lifestyle choice, and provide a sustainable future for the great number of town centres of this scale in the North and West Region.

It would be difficult to envisage how towns with lower population bases could compete effectively at such economies of scale under the Smart Growth Initiatives planned to be put in place under the National Investment Plan.

2.3 A Surplus in the Targeted Population for the North and West?

A question also arises as to where the targeted maximum population growth of 175,000 people would be directed outside of Galway City. Based on 2016 census population and the percentage growth population targeted for settlements in the North and West Region, approximately 74,000 would be directed to settlements over 10,000 and a further 19,000 to settlements between 1,500 and 10,000 with over 80,000, or 47% falling to the countryside and villages less than 1,500. This apparently exceptionally high proportion of targeted population growth falling to rural areas significantly exceeds the existing national average of 37%. It would appear unlikely, given present trends that this exceptional and unprecedented level of rural housing would ever be realised in practice.

This is suggestive of significant, and possibly unaccounted for, capacity within the 175,000 Draft NPF population target for the North and West Region which could be re-directed. This surplus could, for example, contribute towards securing a sustainable future for the towns with populations between 1,500 and 10,000 discussed above in the North and West Region and to address urgent issues of urban decline facing many of these towns.

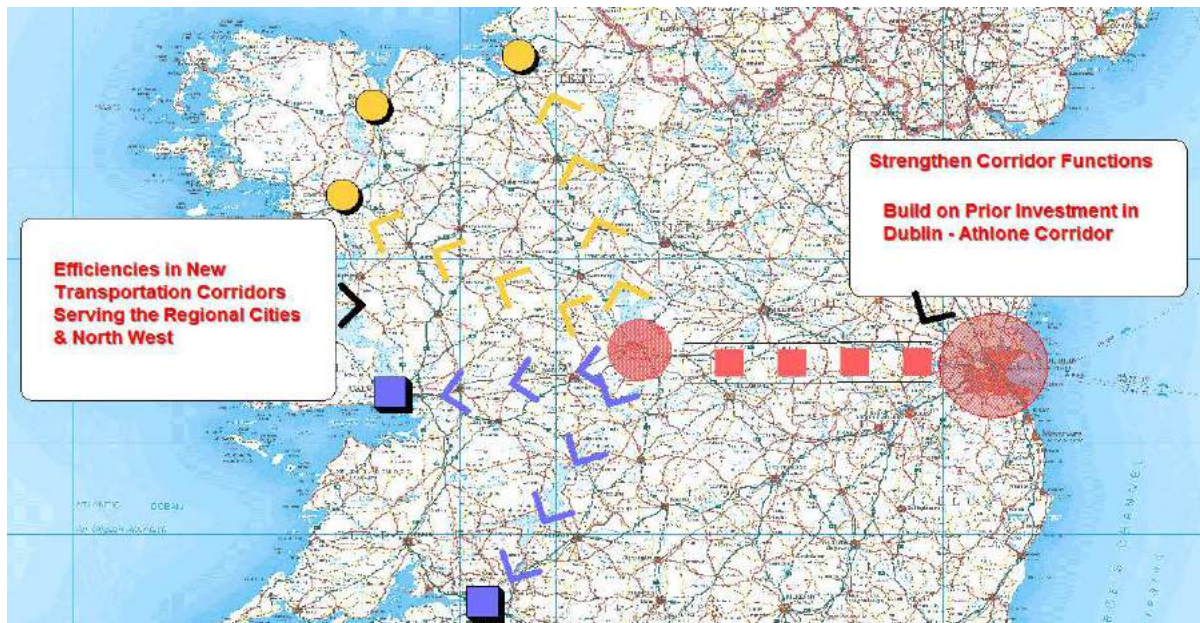
An Alternative Growth Model

Roscommon County Council does not wish to undermine the model outlined in the Draft NPF but rather to offer potential alternative solutions to the question of the North and West Region, which could be built into the Draft NPF. The following sections outline some of these possible alternatives:

3.1 Ensuring Transport Efficiencies and Capitalising Upon Prior Investment

An alternative approach to the issue of ‘Enhanced Regional Connectivity’ set out in Section 1.1 above would be the prioritisation of regional connectivity between centres of scale outside of Dublin with a new focus on public transportation improvements and consolidation of population critical mass on public transportation nodes, rather than the radial road network. This approach could be supplemented with exploitation of capacity in existing regional centres of scale, which have benefited from prior investment in roads infrastructure. The regional town of Athlone for example, has since the completion of the N6/M6 National Road Scheme retained its autonomy as a regional town in its own right and not developed unsustainable ‘dormitory’ characteristics present today in many other midland regional towns. This ability to retain autonomy has not solely been due to spatial factors but also because of employment base, standard and targeted nature (towards the STEM sectors) of third level education, and quality of life benefits.

It would seem much more beneficial and cost effective to capitalise upon prior investment and in an existing, functional high capacity transportation corridor (mixing both public and car based modes) between Athlone and Dublin City, rather than the pursuit of incremental new National road improvements on the radial road network. It is proposed that road improvements schemes instead focus on building connectivity between population centres within the region rather than focusing solely on east-west connectivity. In this regard Roscommon County Council views the inclusion of objectives to improve intra-regional sections of the N4 and N5 as well as improvements to the N61, N62 and N63, National Secondary routes, as crucial towards the aim of ensuring regional accessibility.



Athlone has the advantage of being at a midpoint on the motorway connection between Dublin and Galway city, and having a major existing town/city centre public transportation hub less than 200m from Athlone Town Centre. It is therefore well placed, as it fulfils its role as a regional city, to take on

the role of a central transportation fulcrum or pivot from which to direct future transportation infrastructural investment.

Much of the required infrastructure is already in existence and the model would initially only involve improvements to existing services within the Dublin-Athlone corridor and a change of emphasis when planning for future infrastructural provision. Athlone has the capacity to accommodate this change in emphasis and is an extremely accessible town with almost 85% of the 5,200 commuters who enter the town to work doing so in less than half an hour.

3.2 Towns with Population > 10,000: Targeting Rather Than Diluting NPF Growth Potential

It is recommended that the approach to plan for 40% additional population growth (based on 2016 population) rather than a maximum of 25% targeted for towns in the remainder of the country, among 6 settlements within the North and West Region (amounting to total growth over the NPF period of 11,330) be reconsidered. This recommendation is made in view of the limited impact this measure would have for the region as a whole when the positive effect of this population growth allocation is diluted by dividing its impact amongst six regional towns.

This measure would ensure that the present socio-economic forces which pull youth and employment migrants from the midlands and northwest would continue in the absence of a strong centre of employment, culture and employment in the midlands. It is recommended that instead, existing regional towns in this population category, be allocated population growth at the same rate (i.e. 25%) as the rest of the country, and that the surplus of almost 11,000 from the other 5 regional towns, originally intended to be created by the 40% measure, be allocated to a single regional city in the midlands. It is considered that this measure would have far more impact towards the aim of securing a sustainable future for the North and West Region and that Athlone is best place to capitalise upon such growth targets.

If the model applied as part of the Draft NPF for the regional cities (i.e. a maximum of 60% population growth based on 2016 population), were applied to Athlone (population 21,349), the allocation for the regional city would be 12,809, which would require almost no redirection of growth targets from other regions. In this manner Athlone would be given the opportunity to become a regional city in the midlands with the same proportion of population growth and job creation under the NPF and NIP as the regional cities, bringing the population of Athlone to approximately 35,000 by 2040. This should be the minimum target for urban population growth in Athlone and less ambitious targets would almost certainly fail to achieve the economies of scale necessary to ensure that the population growth would be accompanied by employment growth.

It is, however, recommended herein that an additional 15,000 be added to the overall population target for the North and West Region (bringing the total population growth target for the region from 175,000 to 190,000 people) and that this surplus be targeted to ensuring that Athlone secures a minimum population of 50,000 people and develops the critical mass by 2040 of a regional city sufficient to stem economic migration from the north and west region, retain our skilled indigenous population.

This model would see the Athlone regional city of 2040 connect with a city region which today has a population of 300,000 people, and with population growth in Athlone projected by the Athlone 2040 model, together with natural growth within the city region, exceed 350,000 people by 2040.

Athlone: Best Placed to Become a Midland Regional City



Roscommon County Council's recent pre-draft submission on the NPF '*Athlone 2040- A Regional City in the Midlands*' has shown that Athlone has developed as a comparatively low density settlement with an average urban density of just over 1,100 persons per km² and has abundant capacity to absorb new residential and commercial development, both east and west of the River Shannon. As a new spatial planning paradigm focussed on a new sustainable urbanism emerges, this capacity is a crucial resource.

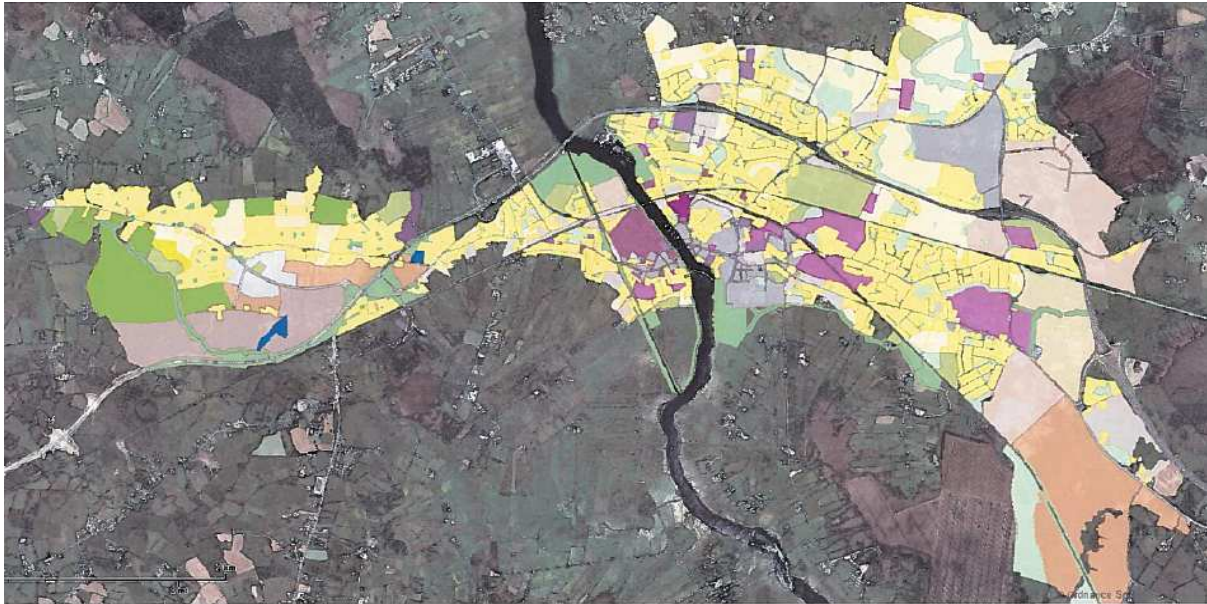
A more sustainable population density model for Athlone would be that of Swords or Bray in the east of the country which have urban densities of over 3,500 persons per km². This density model, is considered more sustainable and one which Athlone has the capacity to adopt. If Athlone were to adopt this density model as a basis for future urban growth and utilise existing land capacity to achieve such densities, an urban population in excess of 60,000 people could be accommodated sustainably within the existing urban environs of Athlone without the need for any further outward expansion.

4.1 All the Ingredients for a Sustainable Live-Work Society, Easing Out-Commuting

Athlone offers all of the strategic benefits of being centrally located in Ireland but without the high land and property prices associated with the larger cities. As Athlone fulfils its role as a regional city it is envisaged that it can provide 'big city opportunities' whilst retaining a convivial rural feel. There is strong potential for quality of life initiatives within Athlone to foster linkages with the wider city region and the exceptional 'blue' and 'green' infrastructural assets on offer, such as Lough Ree and the Shannon network, which have enormous untapped economic and tourism potential for the Athlone city region. These are the critical infrastructures of the future with qualities such as attractiveness, access to nature and pedestrian mobility becoming increasingly reliable indicators of the economic success and sustainability of the modern city.

The current Athlone Town Development Plan and Monksland/Bellanamullia LAP have a combined total of 243 Ha of Industrial, enterprise and innovation technology land use zones with a further 112.9 Ha zoned for the development of a strategic gateway zone to the east of Athlone. This substantial 'strategic reserve' of serviced industrial and enterprise development land both east and

west of the Shannon of national significance is a crucial capacity resource for new employment generating activity, which would significantly reduce the need to travel out of the settlement or region to work.



Source Myplan.ie

Athlone has a long and well established base in manufacturing, pharmaceuticals, research and development, medical devices, telecommunications, software development and has been successful in attracting world class multinational companies in their respective fields such as Ericsson, Alkermes, Alexion etc, which provide a significant employment base.

Athlone is also generally recognised as a research hub, particularly in the areas of bioscience and materials. Leading this reputation, Athlone Institute of Technology (AIT). With internationally recognised excellence in the fields of polymers and materials, bioscience and software, AIT has established strategic research institutes in materials (MRI), bioscience (BRI) and software (SRI), which have which have developed international collaborations with leading multinational companies and universities in Europe, Asia and the US.

Athlone also has a comparatively very high proportion of its population in the 20 to 30 age group and furthermore a much higher than average proportion of this population either working in the industrial sector or engaged in the science, maths and computing fields of study. This is suggestive of a skilled, technologically orientated population and crucially one which is geared to the existing and future sectoral strengths of Athlone Town which does not need to commute out of the region to work.

As highlighted above, Athlone notwithstanding the vast improvements in the N6/M6 motorway, has retained its autonomy as a regional town and has not developed the dormitory characteristics of other regional towns and the factors highlighted above are indicators as to why these unsustainable characteristics have not emerged, and, it is submitted would not emerge as the town assumes the role of regional city. All indicators point to the emergence of a sustainable work-live city of 2040 with targeted NPF population growth and National Investment Plan supports. A society which can easily access the city and wider city region, public transportation, proximate employment for which it is trained and recreation facilities. The society of this city and wider city region would have a reduced need to travel out of the region significantly easing the pressures which have ultimately led to the necessity to develop a National Planning Framework, from within the region.

Smaller Towns in the Northwest: Securing a Sustainable Future

These towns have driven the economy of the North and West Region for centuries, and above any other category of settlement in the country, it is these settlements which are suffering from the most severe urban decline as discussed in the preceding section. Irrespective of the strategy for larger growth centres, the economic success of the region will also be contingent on the success of towns between 1,500 and 10,000 across the region.

As discussed in Section 2.3 above, the Draft NPF population growth target of 15% for these settlements will seriously undermine the future of these towns in view of the implications such targets will have for the determination of future population growth allocations at regional and local level.

It is difficult to reconcile why the decision was taken to spread the effect of an additional share (40% rather than 25%) of population growth amongst 6 settlements within the North and West Region with populations >10,000 when these very centres are the most successful and self sustaining. These centres have typically experienced recent economic and population growth, yet they do not (with the exception of Athlone as discussed above) have capacity or potential to become regional cities in their own right. It would appear that population growth of the order of 40% over the NPF period would be of more benefit to, (indeed critical to their survival), of towns in the 1,500 to 10,000 population category in the same region.

It is recommended therefore that one of two strategies are adopted as part of the NPF to address the plight of smaller towns in the North and West Region:

1. Avoid Population Targets and Simply Target Sustainable Centre Focussed Population Growth:

There are infinitely more important interventions to the future of smaller towns in the North and West Region than population targets, which experience has shown us have the potential to become population caps. A much more necessary intervention would be to ensure that future development is targeted towards the revitalisation of these town centres. The issue of population growth in towns below 10,000 population should therefore be left to regional and local strategies and that a simple 'town centre first' policy for the location of future population growth and investment be advocated through the vehicle of the NPF, allowing local communities to give effect to the policy, through a diversity of means at regional and local level.

2. Develop Population Growth Targets Reflecting the Capacity of Many Towns in This Category:

In the event that population growth targets are deemed necessary it would appear that in order to bring about sustainable regeneration of many towns within this category in the midlands and north-west, a population target of no less than 30% is required. The justification for this is the obvious capacity which the centres of the vast majority of these towns have for rejuvenation through, inter alia, town centre living initiatives.

It is recommended however that a more targeted and evidence based mechanism for the application of population growth targets accompanies any such target to ensure that economic growth follows population growth. One possible approach could be the use of a 'default' population growth target of 15% for all towns with the opportunity to avail of at least double this allocation only where it can be demonstrated that this additional population growth target can be channelled to sustainable brownfield and infill development. The means of demonstrating this capacity could be through a local authority led town centre capacity study and design led town centre re-visioning strategy.

This targeted mechanism for both sustainable urban development and the revitalisation of market and county towns in the midlands and northwest could be linked to the National Investment Plan and competition based 'Smart Growth Initiatives' delivering real world incentives to re-energise these towns from the centre.

Assuming full participation, the latter target of 30% if applied to all of the 37 towns in the North and West Region, which fall within this category, would necessitate a total additional regional population allocation of 18,921 based on 2016 population. It would however offer a tangible opportunity to reverse the fortunes of the market town within the North and West Region, whilst ensuring that this growth was allocated in a sustainable way.

It has been shown in Section 2.3.3 above that a surplus may already exist within the regional growth target and that the reallocation of population growth targets to villages below 1,500 and the countryside is unlikely to be realised in practice. The allocation of 18,921 of this surplus falling to towns between 1,500 and 10,000 would bring the proportion falling to rural villages and the countryside to (36%), which is much closer to the proportional existing national average of 37% for rural villages and the countryside, and one which has the potential to be realised. The scale of this growth model for regional towns would be sufficient to reverse the fortunes of these settlements allowing them to become more self-sustaining without putting any individual settlement in direct competition, in terms of higher order functions, with regional cities.

APPENDIX:

How the population allocation would broadly be distributed in the West Region

>10k Settlement	2016 Population	% NPF Growth	Actual NPF Growth
Galway	78,668	50-60%	44,000
Athlone West	3,913	40%	1,565
Letterkenny	19,274	40%	7,710
Sligo	19,199	40%	7,680
Castlebar	12,068	40%	4,827
Cavan	10,914	40%	4,366
Ballina	10,171	40%	4,068
Total			74,216

5k to 10k Settlements	2016 Population	NPF 15% Allocation
Tuam	8,767	1,315
Monaghan	7,678	1,152
Buncrana	6,785	1,018
Ballinasloe	6,622	993
Westport	6,198	930
Roscommon	5,876	881
Loughrea	5,556	833
Carrackmacross	5,032	755
Total		7,887

County: 1.5 to 5k Settlements	2016 Population	NPF 15% Allocation
Cavan: Baleborough, Ballyjamesduff, Virginia, Kingscourt, Cootehill	12,344	1,582
Donegal: Ballybofey, Donegal, Carndonagh, Bundoran, Ballyshannon, Lifford	15,829	2,374
Galway: Oranmore, Athenry, Gort, Moycullen, Clifden	15,734	2,360
Leitrim: Carrick-on-Shannon	4,062	609
Mayo: Claremorris, Ballinrobe, Ballyhaunis	8,839	1,326
Monaghan: Castleblaney, Clones	5,287	793
Roscommon: Boyle, Castlereagh, Ballaghaderreen	6,368	955
Sligo: Tubbercurry, Strandhill, Colloney, Ballymote	6,901	1,035
Total		11,034

Total Urban NPF Allocation	74,216 + 7,887 + 11,034 =	93,137	53.2%
< 1.5k Villages and Countryside	175,000 – 93,137 =	81,863	46.8%

Section 3.3.2: Alternative Model

Total Urban NPF Allocation	74,216 + 15,774 + 22,068 ³ =	112,058	44.0%
< 1.5k Villages and Countryside	175,000 – 112,058 =	62,942	36.0%

³ i.e. 30% growth rather than 15%