



Comhairle Contae
Ros Comáin
Roscommon
County Council



Mr. David Minton,
Director,
Northern and Western Regional Assembly,
The Square,
Ballaghaderreen,
County Roscommon.

8th February, 2019

**Re: Roscommon County Council submission on the Draft RSES
for the Northern and Western Region**

Dear Mr. Minton,

Roscommon County Council welcomes the opportunity to engage in the formal consultation process on the NWRA's Draft Regional Spatial and Economic Strategy. Having been afforded the opportunity to informally consider partial iterations of a pre-draft document in August and October 2018, it has been interesting to see the evolution of the Strategy as it progressed to the current formal draft stage.

You will recall that Roscommon County Council provided detailed comment on a number of pre-draft chapters in August 2018. My officials and I have now examined the formal Draft RSES and note that some issues previously identified have benefitted from amendment. In particular, I note and welcome the strengthened emphasis on the regeneration and renewal of towns and villages, and I also commend the Regional Assembly on the visually attractive presentation of the draft document. Notwithstanding this, it is of grave concern that many fundamental issues previously raised by my Authority continue to be insufficiently addressed in the Draft Regional Strategy, and in the event that the strategy is adopted in its present form, it would not, in my view, provide a credible and practical framework for the development of the entire Northern and Western Region, nor could it be regarded as consistent with the National Planning Framework.

As currently presented, the document fails to provide a sufficiently clear vision for the region which is capable of setting it apart from other areas of the country or indeed to demonstrate how it can live up to the suggestion on page 30 that *"this regions differentiation is its potential to be the single most 'liveable' place internationally."* The Strategy displays a disproportionate bias in favour of particular areas and identified regional centres above others. Whilst my latter comment is not to suggest that the Strategy is expected to deliver a blueprint for geographically equitable growth and development across the northern and western region, one would expect, having regard to *Project Ireland 2040 – National Planning Framework* as the national policy from which the region must take its cues, that the nationally identified Regional Centres of Sligo, Athlone and Letterkenny (with cross border linkages to Derry) would be dealt with consistently, to ensure the provision of sufficient detail and clarity to guide the future development of each settlement as it evolves to Regional Centre status, and to assist the relevant Local Authorities in preparing detailed plans for the Regional Centres.

I readily acknowledge that a degree of complexity exists in developing strategies for regional centres which straddle county and regional boundaries, with Athlone and Letterkenny (linked to Derry) being cases in point. However, whilst significant effort appears to have been made to set out a detailed strategic vision for Sligo and Letterkenny, Athlone has been treated in an entirely different and inferior manner. You will be aware that this is a matter which I and my counterpart, Pat Gallagher, in Westmeath County Council, have also already raised in our jointly prepared submission to the NWRA. Given the gravity of this issue, I feel it is warranted in this communication to restate the concerns –

“In relation to section 3.6 (d) of the NWRA strategy pertaining to the Athlone Regional Growth Strategic Plan, it is submitted that the provisions included for Athlone are inadequate to support the delivery of a Regional Centre, as envisioned under the NPF. It is noted in the strategy that the Regional Policy Objectives prescribed for Athlone only relate to the parts of Athlone within the North-Western Region. Further, it is suggested, disappointingly, that strategic policy proposed for Athlone is inferior and appears secondary when considered in the context of that provided elsewhere in the Strategy for other designated regional centres in the NWA.....

.....There is need to ensure that a consistent approach is afforded to all regional centres as set out in the NPF and that consistent terminologies are used, zones of influence identified and parameters prescribed for the preparation of future planning frameworks associated with these Regional Centres.....

.....A joint approach between the NWRA and EMRA is essential in this regard.”

I recognise that the extent of information contained in the Draft RSES in respect of Sligo and Letterkenny may, in part, have resulted from the respective Local Authorities having such detail already prepared, as would be expected in adherence to their statutory obligations to prepare plans for those urban areas. However, I would suggest that the mere availability of same is not a justification for the inclusion of extensive localised detail, in a document which should retain a higher level strategic regional focus.

You will be aware that in order to assist and inform the NWRA and EMRA during the drafting of the respective RSES's, a document entitled 'Athlone – A Key Regional Centre', which was jointly prepared by Roscommon and Westmeath County Council's, was provided in July 2018, and provided a significant level of detail on the existing profile of Athlone, the joint vision of the two Local Authority's for the future development of Athlone as a regional centre, and also dealt with topics such as the economy and employment, retailing, housing, and amenities / culture and the environment and outlined the role of these sectors in shaping the future growth of Athlone. I accept that the document did not include details of a plan boundary. In this regard, I would suggest that to devise a boundary for the Regional Centre as part of that document preparation would have been entirely premature and without any statutory foundation, given that Athlone had only been confirmed as a Regional Centre (with a commensurate

population allocation), at the latter i.e. post draft stage, of the preparation of the *National Planning Framework*. Indeed, even to do so at the present time, would also be premature, given that the precise geographical delineation of Athlone Regional Centre can only realistically occur as part of the preparation of the Joint Urban Area Plan, and will be informed by detailed survey, analysis and assessment that will be undertaken as part of that process.

Notwithstanding my views on the inappropriateness of including extensive localised content in the Regional Spatial and Economic Strategy, I consider that had there been genuine intent on the part of the NWRA to treat the Regional Centre of Athlone on an equitable basis with its counterparts in the Region i.e. Sligo and Letterkenny, sufficient information was provided to enable this.

My concerns regarding the NWRA's Draft RSES are not confined to the lack of vision or strategic guidance for the future development of Athlone as a Regional Centre or the apparent lack of appreciation of Athlone in a holistic context. Further areas of concern, which Roscommon County Council highlighted in previous information submissions and which continue to prevail, include insufficient recognition of and support to address existing infrastructural constraints, the generic rather than region specific nature of the renewable energy strategy identified, continuing weaknesses in the objectives included to foster the renewal and growth of towns and villages, and an overall propensity in the Draft RSES to include excessive replication of the content of higher order policy documents resulting in difficulties in identifying a clear region specific strategy.

Concluding comments

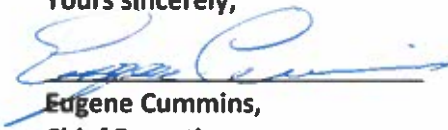
In conclusion, and having regard to the points raised above and in the accompanying detailed submission, I consider it necessary to highlight the following to the NWRA:

- It is absolutely imperative that the RSES recognises and respects the *National Planning Framework* as the overarching legislative framework and governing policy, and that the RSES wholly reflects this national strategy. On the basis of the current content, the Draft RSES is inconsistent with the *National Planning Framework*, particularly in respect of its treatment of Athlone Regional Centre, as well as other essential aspects which significantly affect County Roscommon. I would urge the NWRA to give serious re-consideration to the content and strategy outlined in the document, and to make all necessary amendments, including many of a fundamental nature. It is my sincere hope, and indeed it should not be necessary, for Roscommon County Council to seek to have this matter rectified through appropriate legal mechanisms.
- The Regional Spatial and Economic Strategy for the Northern and Western Region must focus on providing a clear and strategic vision **for the region**, which should not be detracted from by an inappropriate focus on a vision for the entity of the Northern and Western Regional Assembly;

- The RSES must facilitate the development of Athlone to its full potential as a Regional Centre. This includes providing sufficient flexibility to facilitate the demarcation of a realistic boundary extent, at a local level, during the course of preparation of a Joint Urban Area Plan. The RSES should also provide clarity on the fact that references to a 'Joint Urban Area Plan' do not infer a confinement of the plan area to the extent of the amalgamated areas which are currently the subject of the *Athlone Town Development Plan 2016* and the *Monksland / Bellanamullia (Athlone West) Local Area Plan 2016 – 2022*.

I hope that this submission from Roscommon County Council is received in the spirit of engagement in which it is intended, and that it will be of benefit in shaping a successful Regional Strategy, consistent in all respects with the National Planning Framework, and enabling the region to thrive in future years.

Yours sincerely,



Eugene Cummins,
Chief Executive,
Roscommon County Council.