

Roscommon County Council

Submission on the NWRA's Draft Regional Spatial and Economic Strategy (February 2019)

Executive Summary

Roscommon County Council (RCC) commentary in this submission is intended to be constructive and to assist in the finalisation of a Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region, which will provide a template for the successful growth and development of the region over the coming decades.

Key Considerations

Region Specific Policy Requirements

- The Draft RSES contains a significant amount of general and unnecessary background content, excessive focus on the NWRA as an organisation rather than on the Assembly's role in driving the development of the region, and the extensive replication of higher level policy documents. Whilst a degree of context is undoubtedly required, the extent of replication of other policy documents is excessive. This approach and the resultant voluminous nature of the strategy produced appears to differ significantly from the Draft RSES's produced by the other Regional Assemblies, where concise documents have been presented, in a logical format, and which crucially offer far greater clarity and focus on the respective regional visions and resultant region specific development strategies. It is essential that a 're-balancing' of the NWRA's RSES is undertaken to ensure that it fulfils its role of setting out a clear strategic development framework specifically for the Northern and Western Region.

Athlone as a Regional Centre

- RCC recognise that the larger geographical extent of the Regional Centre of Athlone is located in Co. Westmeath, within the Eastern and Midlands Region. However, the western area of Athlone (i.e. the Monksland / Bellanamullia area, which is also known as Athlone West) is an integral component of the Regional Centre and will be a vital part of the future growth and development of the centre. As such, it is crucial that the RSES for the Northern and Western Region includes adequate content on Athlone, in order to ensure that its future role in, and influence on the region is appropriately reflected.

The concerns of Roscommon County Council in relation to the deficiencies in the current Athlone related content in the Draft RSES, and the fact that it has not been afforded parity with the other regional centres of Sligo and Letterkenny, have already been highlighted in a joint submission to the NWRA on the Draft RSES, and also to the Eastern and Midlands Regional Assembly in a submission on their Draft RSES. It is imperative that both RSES's adopt

a consistent approach in respect of the development strategy and vision for the regional centre of Athlone, and that the strategy and vision should be wholly consistent with the role assigned to Athlone in the National Planning Framework (NPF).

The treatment of Athlone in the NWRA Draft RSES can only be perceived as a diminution of the status assigned to it in the NPF, particularly when considered alongside the detailed strategies and visions included for the other regional centres of Sligo and Letterkenny (with the development of the latter being highly dependent on its linkages to Derry and Strabane, which lie outside of the northern and western region and outside of the jurisdiction of the Republic of Ireland).

It is noted that the approach taken by the NWRA in respect of Sligo and Letterkenny includes extensive detail which would more appropriately emerge as part of the local level plan preparation and policy development. This is in marked contrast to the Eastern and Midlands Regional Assembly or the Southern Regional Assembly, which confine themselves to providing higher level strategic guidance and direction, in a concise format, in respect of the majority of the Metropolitan Areas, Regional Centres and Key Towns. In the interests of overall consistency, it may be appropriate for the NWRA to re-consider the approach and Regional Centre content.

RCC is also concerned at various conflicting commentary which has implications for the settlement hierarchy in the region. While RCC notes that the NPF does not refer to 'Key Towns' the need to identify growth settlements in a regional context is recognised and as such the identification of 'Key Towns' in the Draft RSES is considered to be generally consistent with the NPF National Policy Objective 9. However, there is a lack of detail in respect of the criteria which resulted in the identification of the 8 Key Towns. Furthermore, the role of the Key Towns (below that of the Regional Centres) is called into question, in light of conflicting commentary in the Draft RSES which appears to promote non Key Towns i.e. the lower order settlements of Westport, Athenry and Virginia / Carrickmacross, as having "strategic development potential of a regional scale." Such a development approach is entirely inconsistent with the NPF and the clear strategy of developing regional centres as 'centres of scale' and would also undermine the intended role and growth potential of the Key Towns.

Transport Infrastructure

- Road infrastructure, particularly elements of the national road network through Co. Roscommon, must be sufficiently addressed in the RSES. The downgrading of the 'N61 Athlone to Boyle enhancement' from a key investment priority in the *Planning Guidelines for the West Region 2010-2022* to a medium term project in the Draft RSES is an unacceptable regressive step and must be addressed, particularly having regard to its vital function of providing connections between the two regional centres of Athlone and Sligo. The lack of reference to the M6/N6 serving Athlone Regional Centre must also be rectified, to ensure

that any capacity constraints at existing junctions / interchanges are acknowledged and addressed in the Regional Strategy and to ensure that do not become an impediment to the future growth of Athlone as a regional centre (and Athlone West in particular, given its dependence on the M6/N6 interchanges).

Energy

- ‘Renewable Energy and the Low Carbon Future’ is discussed in general terms, and despite outlining international and national targets and commitments, the draft document fails to identify a clear strategy for the region. Objectives are of a general nature, seeking to “encourage,” “promote” and “support” energy generation – the same objectives are applicable to any region in Ireland or overseas. The RSES must go further, to deliver a region specific policy direction, based on the characteristics of the northern and western region and the capacity to facilitate various forms of energy generation. It is unacceptable to suggest as per Regional Policy Objective 39 that the identification of potential renewable energy sites will occur within 3 years of the adoption of the RSES. An increased focus must be placed on renewable energy and the RSES must identify the specific locational strengths of the region in accommodating various types of renewable energy projects (for example Counties Mayo and Galway being in a position to accommodate and benefit from off shore wind energy projects, whilst many areas of Counties Roscommon and Leitrim are appropriate candidate locations for conventional wind energy projects).

The following commentary is structured in sequential order, as per the content of the Draft RSES.

Director's View

- The Director's expressed commitment to integrating *"our land use planning with the provisions of the NPF and ensure that housing, transport and infrastructure support growth across the region"* and the recognition of this being a *"diverse region with distinct spatial patterns and diverse geographical propositions"* are both strongly welcomed. They collectively encapsulate the essential elements of a successful, distinctive strategy for the northern and western region. However, as currently presented, Roscommon County Council is concerned that the Draft Strategy is deficient in the identification of initiatives or policies which capitalise on regional distinctiveness, and falls short in promoting the alleviation of constraints in elements of key infrastructure.

Section 1.2 – Regional Spatial and Economic Strategy (RSES)

- RCC's notes the statement that the *"RSES has identified this region's key strategic assets, opportunities and challenges and set out policy responses to ensure that people's needs.....are met up to 2040 and beyond"*. Whilst RCC firmly endorse the aspiration that the RSES would encapsulate all of this, there is nonetheless concern that the Draft RSES as currently presented does not achieve this. (Further detailed commentary will be provided to identify deficiencies noted by RCC, under relevant section headings.)

Section 1.3 – NWRA: The Organisation in Focus

- RCC are concerned at the inclusion of this section, and consider that this and other inclusions (such as the content of Section 2.1 – NWRA: Approach to Strategy, which includes the NWRA's own organisational vision and mission statement as opposed to a vision and mission statement for the Northern and Western Region) place an inappropriate focus on the NWRA as an entity. This may be more appropriately expressed in promotional material separate from a strategy for the future development of the region, with delivery of the strategy being dependent upon the co-operation and drive of all stakeholders and not only the Assembly.

Sections 1.4 – 1.8 (pages 10 – 23)

- Section 1.5 contains the first reference in the document to Athlone as a regional centre. Athlone is referred to in several instances throughout the document as being 'in the Midlands.' Whilst it is accepted that the larger component of the Athlone area is within Co. Westmeath, in the Midlands region, the Monksland / Bellanamullia area in Co. Roscommon is nonetheless an essential part of the Regional Centre, and as such explanation on this should be provided at the outset, and appropriate terminology should be incorporated in other references to Athlone in the document. It is essential that the relevance of Athlone to Co. Roscommon and to the wider western region is adequately alluded to and recognised in the NWRA Strategy. Such a requirement is consistent with the NPF, in which it is clearly

recognised that “*Much of Roscommon functionally operates as part of the Midland region, focused on Athlone, which is partly located within the County.*”¹

- Sections detailing ‘Policy Background, NPF: Spatial Impact, Resourcing, Economic Development, and Wider Policy Environment’ typify the aforementioned excessive replication and repackaging of content from higher level and other background policy documents. The vast majority of the content is not region specific and is equally applicable to the Eastern and Midlands Region and the Southern Region. It is noted that the extent of replicated detail is not contained in the Draft RSES’s for those regions, and consequently there is a far greater degree of clarity offered on the specific regional development strategies to be pursued from the outset of those documents.

Section 1.9 – The Opportunity: What this means for the Northern and Western Region

- RCC welcomes the inclusion of maps and graphics as a means of illustrating geographic relationships. It is noted that the ‘settlement map’ presented on page 25 appears to mainly contain the Galway Metropolitan Area, the three identified regional centres within the northern and western region, and the key towns (as subsequently identified on page 60 of the document). Whilst the inclusion of all of the foregoing is logical and in accordance with the settlement hierarchy emerging in the Draft Strategy, the inclusion of Westport and Ballaghadereen on this map is unacceptable and appears to confer a status on those settlements which is not identified in the Draft RSES and which would be premature, given that the roles and hierarchical position of those settlements will only emerge in the course of the preparation of the Development Plan at local county level.
- In conjunction with the significant concerns already expressed by RCC about the apparent inferior treatment of Athlone Regional Centre in this Draft RSES, the concern is compounded by its depiction on page 25, in which Athlone appears marginalised, and having a far lesser zone of influence than that envisaged for the other regional centres of Sligo and Letterkenny (despite the fact that the overall Athlone area at present i.e. encompassing areas of the settlement within Counties Roscommon and Westmeath has a significantly greater population base than either Sligo or Letterkenny,² has a strong economic base and has the benefit of established connectivity to surrounding areas from its advantageous geographic location).
- The reproduction³ of the Regional and County Population Projections to 2031 from the DHPLG’s ‘Roadmap’ is welcomed and provides clarity on the envisaged level of growth at regional and county level.

¹ NPF, page 40.

² As per Census 2016 population figures (pg.50, Draft RSES) : Letterkenny – 19,300, Sligo – 19,200, and Athlone – 25,000.

³ Pg. 26.

Section 1.10 – Informing A Vision

- The key element in this section would appear to be that *“Ultimately this regions differentiation is its potential to be the single most ‘liveable’ place internationally.”* RCC noted the inclusion of such an aspiration in pre-draft documentation and the comments expressed at that time remain relevant at this stage. In particular, RCC support the inclusion of ambitious aims in relation to the future of the region, but would question whether or not this is a realistic and achievable aspiration. The Draft RSES does not adequately identify the attributes which would mark out the regions differentiation, nor is there a sufficiently clear policy direction to achieve a differentiation which would set it apart internationally.

Chapter 2 – Strategic Analysis and Vision

- The title of the chapter suggests that it will contain the essential element of the Strategy i.e. the strategic vision for the development of the northern and western region. However, whilst this chapter would be expected to provide definite and immediate clarity on the proposed strategy for the region, it is instead diluted by excessive background content and includes information which would be more appropriate in a brief introductory chapter (including a summary of the methodology of the preparation of the Strategy, and the detail contained in Section 2.4 on the various Environmental Assessments which were undertaken as part of the process). Again, an examination of the approach adopted in the other Draft RSES’s demonstrates that concise introductory chapters are capable of encapsulating all necessary elements of information.

It is unfortunate that by the conclusion of Chapter 2 (49 pages into the document), a clear identification of the strategic vision for the future development of the north and west as a unique, distinct and dynamic region cannot be considered to have emerged. Additionally, the introductory chapters would seem to be lacking in providing a concise regional profile, and instead information which might be expected as part of a cohesive profile is randomly included in various disparate sections of the introductory chapters, thereby failing to provide a holistic view of the region. A clear understanding of the existing profile must be a key foundation on which the vision and strategy for the future growth of the region is based.

Chapter 3 – People and Places

Section 3.3 - Place-Making and Section 3.4 - Urban Places of Regional Scale

- RCC welcome the recognition given on page 57 to the need for effective integration of land use and transport planning. The preparation of Local Transport Plans for the 12 urban centres in the region (including Athlone, which lies partially within the region) is a logical and necessary step in identifying and addressing constraints, which could otherwise impede essential urban growth. Clarification on the Local Authority being responsible for the preparation of the plans is also beneficial.

- It is noted that the Draft RSES unambiguously states that “our strategy must focus on the significant growth of the urban centres of Galway, Letterkenny, Sligo and Athlone.” In light of such clear recognition and expressed commitment, it is difficult to comprehend the approach that has been taken in subsequent sections of this chapter to include extensive sections (including a level of detail which is inappropriate in a regional strategy) on Galway, Letterkenny and Sligo, and negligible content on a strategic vision for Athlone.

The ‘population uplift’ table included on page 59 has already been the subject of comment in the joint submission to the NWRA from Roscommon and Westmeath County Councils, in particular in respect of the differing approaches taken by the NWRA and the EMRA in their treatment of Athlone. While the proposed population uplift in the relevant Regional Centres (including Athlone) to 2026, 2031 and to 2040 is set out in detail in the NWRA Strategy, the approach taken in EMRA’s RSES is less prescriptive and does not include a short, medium or long term breakdown. Whilst both approaches may have merit in their own right, should the current differing methods remain as part of the adopted RSES’s, this will present significant difficulty for the constituent local authorities when preparing and adopting a Joint Urban Area Plan for Athlone.

An agreed method of population allocation in both strategies should be prescribed to facilitate the preparation and adoption of a Joint Urban Area Plan for Athlone.

- The Draft Strategy identifies 8 ‘Key Towns’ in the region. Whilst RCC does not disagree with the towns identified, it would nonetheless be beneficial to include an explanation of the attributes which led to the identification of the towns and which distinguishes them from other settlements with similar characteristics. It is also noted that the NPF refers to ‘larger towns’ in multiple instances, but does not include any definition or identification of such ‘larger towns.’ RCC assumes them to be towns of a lower order in the regional settlement hierarchy, but considers that clarity on this matter would be beneficial, in order to ensure a consistent understanding of the intended settlement hierarchy across all nine counties in the region.
- RCC is generally in agreement with the approach pursued in the NWRA Draft RSES in setting target growth parameters of ‘at least 40%’ for Regional Centres and ‘at least 30%’ for Key Towns. The inclusion of the quantifier of ‘at least’ is particularly welcomed and is a necessary addition, as otherwise a rigid imposition of ‘40%’ or ‘30%’ may unintentionally constrain growth which it would be appropriate and sustainable to facilitate in such centres.

It is noted that unlike the somewhat prescriptive approach detailed in tabular form on page 59 in respect of short, medium and long term population uplift in the Galway Metropolitan Area and the three Regional Centres (Sligo, Letterkenny and Athlone), there are no corresponding details in respect of the apportionment of the population uplift (‘of at least 30%’) in the Key Towns in the short, medium and long term. RCC welcomes the benefits of this more flexible approach to accommodate the expected population uplift, and believe that

the determination of the proportion of the overall population uplift is most appropriately determined at local level for each relevant plan period, taking account of existing local social and economic conditions.

- It is noted that outside of the Regional Centres and Key Towns, the Draft RSES advocates *“balanced growth elsewhere within each county to be determined locally and based upon the varied growth potential of different places.”* As outlined above, flexibility at local level is generally favoured. However, it is essential that the remainder of the RSES content expresses strong support for the growth of settlements, in order to deliver on the NPF objective of strengthening the overall urban structure, encouraging population growth in employment and service centres and reversing the stagnation and decline of many smaller urban centres.⁴ Commentary in the RSES must provide clarity on this, in order to ensure that the Regional Strategy is not misinterpreted to become a vehicle to facilitate an inappropriate proportion of development in the wider countryside.
- The concluding text on page 59 appears to be incomplete and is not continued on the following page.

Section 3.5 – Smaller Towns, Villages and Rural Areas

- The opening paragraph of the section appears to a certain extent to validate the unsustainable concept of residents living in the countryside, remote from their place of work and main services. Rather than seeking to arrest further unsustainable patterns of urban generated development in the countryside, it instead appears to propose improved transport and telecommunications connectivity as a means to enabling the perpetuation of such patterns. The NPF vision for the countryside, which is one shared by RCC, may be unintentionally diluted, due the language used in this paragraph.

(Reminder re. NPF statement on the ‘Countryside’ (NPF, pg. 74) – “The Irish countryside is, and will continue to be, a living and lived-in landscape focusing on the requirements of rural economies and rural communities, based on agriculture, forestry, tourism and rural enterprise, while at the same time avoiding ribbon and over-development from urban areas and protecting environmental qualities.”)

- In the section entitled ‘Vibrancy and Vitality’ (pg. 62), as part of a discussion on the challenges presented in managing rural areas, the Draft Strategy states that the NPF *“defines areas under urban influence as being effectively those areas within the 15% commuter catchment of Cities, Regional Centres and the Key Towns.”* The reference to ‘Key Towns’ is incorrect, and as mentioned in the Executive Summary of this submission, ‘Key Towns’ are not explicitly referenced in the NPF. The NPF refers to the “15% commuter catchment” of “cities and large towns and centres of employment.”

⁴ NPF – National Policy Objective 7.

There are numerous larger towns and centres of employment within the region, which the Draft RSES does not identify as 'Key Towns', yet due to commuting patterns and pressure for housing development in the immediate hinterland of such towns, may merit classification as being in an area under urban influence. This will be established through analysis carried out at Local Authority level, as part of the Development Plan process. It is essential that the Draft RSES does not inhibit such a process, by a premature suggestion that the 15% commuter catchment analysis only applies to Galway, Sligo, Letterkenny, Athlone and the 8 identified 'Key Towns.' RCC request that this misnomer is corrected, and that reference is appropriately made to 'areas under urban influence' being within the 15% commuter catchment of "cities and large towns and centres of employment." A specific Regional Policy Objective must also be included on page 64, in order to give appropriate policy expression to the commentary and intent outlined on the preceding pages.

- In the interests of ensuring universal understanding and consistent interpretation, it would be useful to include the definition of the 'commuter catchment', as per footnote 34 of the NPF.⁵
- The section on 'Regeneration and Revitalisation' of towns and villages is a welcome inclusion and is considered by RCC to be one of cornerstones of the Strategy for the development of the region. Reference to practical measures such as "the provision of serviced sites" and providing for "low density housing demand, as an alternative to living in one off houses outside towns and villages" is welcomed. However, RCC would note that there are likely to be practical difficulties in the application of such concepts, due in part to the deficiencies in available public infrastructure within settlements which may otherwise be suitable locations for serviced sites to accommodate lower density housing and the consequent need for Irish Water to engage in finding a solution to such issues. Additionally, the DHPLG has also to date taken a broad brush approach to the development of settlements, generally requiring higher densities, with little recognition of the distinctions between larger urban settlements and small rural villages. It would be beneficial for the Draft RSES to include more extensive detail on how such practicalities are to be addressed.
- Regional Policy Objective 14 pertains to the delivery of "at least 20% of all new housing in rural areas on brownfield sites" – clarity is required as to whether or not 'all new rural housing' is intended to include housing proposed in the open countryside and also within rural settlements (smaller towns and villages) or does it refer solely to the open countryside?
- Regional Policy Objective 18 requires local authorities to identify and prioritise a programme for the provision of serviced sites within smaller towns and villages within 1 year of the adoption of the NPF. The practicalities associated with serviced site provision have already been set out in a previous point. Additionally, it is assumed that the timeline to 'identify and

⁵ "The standardised EU/OECD definition of a city region is where 15% of the workforce is employed in the principal city area. When this is mapped, it defines a city region community catchment, or functional area.

prioritise' refers in error to the NPF rather than the RSES, as clearly delivery within 1 year of the adoption of the NPF could not be achieved.

- Given that the section of the Draft Strategy immediately preceding Regional Policy Objectives 11 – 20 discusses the subject matter of 'Smaller Towns, Villages and Rural Areas' the RPO's fail to address the development of rural areas i.e. the countryside, outside of towns and villages. It is essential that there is clear policy direction, in the form of Policy Objectives, to set the parameters for the future development of the countryside.

Section 3.6 – Delivery of Compact Growth

- The subheading of Section 3.6(a) appears conflicting in that Galway is referenced as a 'Metropolitan Area' and also as a 'Regional Growth Centre.' The latter reference is inconsistent with the NPF, which clearly identifies Galway as one of the five cities, as distinct from the lower level 'regional centres.'
- RCC has significant concern regarding the disproportionate levels of detail provided in respect of the three identified regional centres of Sligo, Letterkenny and Athlone, with the Athlone content being entirely deficient and failing to establish a clear vision or holistic strategic direction for the development of the Regional Centre. This is a significant issue which has already been highlighted in the recent joint submission to the NWRA from Roscommon and Westmeath County Council's, and it is appropriate to reiterate in this current submission, the points previously raised:

"A greater recognition to the role that Athlone plays in the region should be set out. 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.

Accordingly, due consideration should also be given across both strategies to the terminology and methodologies employed in association with identified regional centres of Athlone, Letterkenny, Sligo, Drogheda and Dundalk and in terms of identification of plan extents, vision and scope. There is need to ensure that a consistent approach is afforded to all regional centers 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. With regard to the proposed policy to prepare Metropolitan

Strategic Area Plans (MASP) plans for Sligo and Letterkenny, it is noted that the NPF prescribes the preparation of MASPs for Dublin, Cork, Limerick, Galway and Waterford Metropolitan areas only. A joint approach between the NWRA and EMRA is essential in this regard.

It is necessary that a joint approach and shared vision (including associated housing targets) is delivered for Athlone as reflected in both regional strategies for the North Western Regional Assembly and the Eastern and Midland Regional Assembly. Alignment and consistency between both RSESs is fundamental in this regard and steps should be taken to ensure this outcome. WCC and RCC consider that both RSES's must adopt a holistic approach to the comprehensive development of Athlone and its western environs." (Extract from the Joint Submission, 21st January 2019).

As already noted in the Executive Summary of this submission, the approach taken by the NWRA in respect of Sligo and Letterkenny includes extensive detail which would more appropriately emerge as part of the local level plan preparation and policy development. This is in marked contrast to the approach taken by both the Eastern and Midlands Regional Assembly or the Southern Regional Assembly, with their Draft RSES's confining themselves to providing higher level strategic guidance and direction, in a concise format, in respect of the majority of the Metropolitan Areas, Regional Centres and Key Towns. In the interests of overall consistency, it may be appropriate for the NWRA to re-consider the entire approach and content in respect of Regional Centres.

Section 3.7 – Regional Support Towns

- **Section 3.7.5 : Key Town - Carrick on Shannon** : RCC acknowledge the inclusion of a reference to the preparation of a "Joint Area Plan with Roscommon to deliver an integrated framework for the future development of the urban area." Notwithstanding this, the profile on Carrick on Shannon is devoid of any reference to or explanation of the actual interlinkages with Cortober, Co. Roscommon, despite the fact that the boundary identified on the map contained on the 'Summary Insights' insert encompasses the majority of the Cortober area.
- **Section 3.7.7 : Key Town – Roscommon** : Under the heading of 'Key Future Priorities' the reference to pursuing the delivery of transport improvements on the transport network is welcomed, and in particular the specific reference to the upgrading of the N61 national route between Boyle and the Regional Centre of Athlone is considered to be a vital inclusion. Having regard to the recognition afforded to the N61 in Section 3.7.7, it is essential that this is equally reflected in the more detailed Transport Section of the Draft RSES.
- It is disappointing to note, despite RCC drawing attention to the issue in response to a pre-draft circulation, that the summary information presented on Roscommon Town on pg. 151 remains unchanged and outdated. The settlement boundary identified reflects the boundary

of the expired *Roscommon Town Area Plan 2008*, rather than the reduced boundary extent as defined in the current *Roscommon Town Local Area Plan 2014 – 2020*, which has been in effect since December 2014. Outdated information is also included in respect of zoned lands, with reference being made to “294.9 ha of unbuilt zoned residential lands.” As per the 2014 LAP, the extent of such zoned land (comprising of ‘New Residential’ and ‘Strategic Residential Reserve’) is 49.36ha.

- **Section 3.7.9 - Other Rural Areas:** This section includes specific content on Westport, Athenry, Virginia / Carrickmacross and Ireland West Airport Knock. The importance of Ireland West Airport Knock to the region and the enhanced role that it is likely to play in the future development of the northern and western region is undisputed, and RCC is supportive of its designation as a Strategic Development Zone. Aspirations for the continued growth of the airport are considered consistent with the recognition afforded to it in the National Planning Framework.

In respect of the remainder of the ‘rural areas’ detailed in this section i.e. Westport, Athenry and Virginia / Carrickmacross, there appears to be no particular justification for their specific identification and the preface to the place specific content is particularly troubling in describing them as “locations with strategic development potential of a regional scale.” This is significantly at variance with the overarching policy and settlement hierarchy expressed in the adopted *National Planning Framework* (in which it is noted that none of the aforementioned towns are referred to⁶), and pursuance of this would undermine the growth of the identified Regional Centres, as well as the ‘Key Towns’ in the northern and western region. RCC would urge extreme caution in proceeding to identify the three centres for development “at a regional scale” and would highlight the lessons that have been learnt from the past, including the ineffectiveness of the ‘gateway and hub’ concepts of the National Spatial Strategy, and the belated realisation that attempts to achieve dispersed growth across many settlements fails to enable any settlement to truly thrive, and results in a demand for the uneconomic provision of dispersed infrastructure and services.

Notwithstanding the fundamental concerns associated with the reference to those settlements having “strategic development potential of a regional scale” RCC would further question the justification for any elevated role to be assigned to those settlements in the Regional Strategy relative to many other towns of comparable size and having similar attributes.

⁶ Reference is solely made in Appendix 2, in which the settlements are included within the table entitled *Population and Employment in Urban Settlements in the Northern and Western Regional Assembly area, Census of Population 2016*.

Section 4.4 – Place Based Development

- RCC welcomes the prominence afforded to the Atlantic Economic Corridor initiative, and consider that this has the potential to assist in developing a strong regional identity and particularly benefit the less developed areas on the western seaboard. Notwithstanding the positives, it is imperative that the Atlantic Economic Corridor develops in synergy with **all** three Regional Centres in the northern and western region, and should not become a mechanism to inadvertently advantage Sligo and Letterkenny, and in doing so potentially undermine the status of Athlone.

Section 4.5.1 – Sectoral Focus

- The inclusion of a section on Ireland’s Hidden Heartlands is welcomed. However, in comparison to the Strategy outlined for the Wild Atlantic Way and Ireland’s Ancient East, with both sections including identification and promotion of a number of ‘candidate towns’, the section on Ireland’s Hidden Heartlands is lacking in the identification of a ‘Candidate Destination Town.’ In the context of the Northern and Western Region, it is suggested that both Boyle and Carrick-on-Shannon, which are at pivotal locations in the heartlands, already have many of the attributes which render them appropriate for inclusion as ‘candidate destination towns’.

Whilst acknowledging that the Hidden Heartlands concept is strongly driven by the presence of the River Shannon through the area, the Heartlands nonetheless extend significantly beyond the route of the river, as demonstrated for example by the inclusion within the Hidden Heartlands area of the Beara Breifne Way, running some distance west of the Shannon, and encompassing the Lough Key Area (which hosts the high profile visitor attraction of Lough Key Forest and Activity Park). Roscommon County Council is aware of a recent decision by Fáilte Ireland to identify and promote Lough Key as one of the prime tourism offerings within Ireland’s Hidden Heartlands. The key role of Lough Key Forest and Activity Park is further bolstered by recent recognition at the Irish Tourism Industry Awards 2019, in which it was awarded the Best Tourism Experience in Ireland’s Hidden Heartlands. The proximity of Boyle to Lough Key, and the existing linkages and interdependencies must be highlighted in the RSES. Significant work has been done to date on the development of ‘Boyle 2040.’⁷ The implementation of the regeneration strategy outlined in ‘Boyle 2040’ will result in significant improvements in the public realm and within the town core in general. Boyle has a rich built heritage and is ideally positioned to capitalise on its proximity to and linkages to Lough Key Forest and Activity Park, as well as its role as a hub on the Miners Way and Historical Trail. Boyle is also well served on public transport routes.

⁷ A collaborative initiative between the Local Authority and Boyle Town Team. ‘Boyle 2040’ is due to be officially launched in Autumn 2018. The document is an “expression of the ambitions that exist within Boyle Town Team to create a re-imagined, unique and interesting town centre.”

Additionally, given that the River Shannon is a key feature of the 'Hidden Heartlands' concept, the RSES should incorporate a greater emphasis on development opportunities linked to the waterway and its environs. In this regard, RCC wish to remind the NWRA of details contained within a document entitled 'Athlone – A Key Regional Centre'⁸ in relation to a Wilderness Park Project encompassing areas of County Roscommon (as well as areas of Counties Westmeath and Longford).

"The Shannon Wilderness Park Project, centred on the Lough Ree and Mid Shannon Wetlands, should be undertaken as a collaborative regional approach, and will further enhance the region's potential to establish itself as a world class outdoor activity tourism / leisure base. Such a collaborative approach shall be undertaken in conjunction with both Council's together with Offaly and Longford County Council's."

The opportunity should also be taken in this section to elaborate on the valuable tourism role of Lough Ree in a regional context, and to include detailed reference to the Lough Ree – Lake of the Kings Initiative.

Section 4.5.2 – Renewable Energy and Low Carbon Future

- Commentary on page 178 of the Draft RSES states the importance of the region setting *"out its ambitions with regard to renewable energy.....and shows its ability to help contribute to achieving national targets."* RCC fully supports this approach and based on the statement, expected that the subsequent sections of the Draft RSES would firmly set out how the region will facilitate and manage renewable energy. It is extremely disappointing to find instead that this fundamental issue is postponed, firstly through an apparent reliance on the forthcoming 'Renewable Energy Policy and Development Framework' to *"identify strategic areas for the sustainable development of renewable energy projects of scale"* and secondly (as detailed in Regional Policy Objective 39) through NWRA co-ordination with Local Authorities and other stakeholders, to identify potential renewable energy sites of scale *"within three years of the adoption of the RSES."*

This delayed approach will result in the RSES for the northern and western region failing to deliver a cohesive regional strategy for the development of renewable energy. The deferral of hard decisions for 3 years will result in an untenable situation in which Local Authorities in the region will be preparing Development Plans, including Renewable Energy Strategies, within that 3 year timeframe, in the absence of a clear strategic regional policy direction. This fragmented and localised approach will fail to deliver on the regions recognised growth potential for renewables, and ultimately the region will not be well positioned to play its part in meeting key targets and transitioning Ireland to *"a competitive, low-carbon, climate – resilient and environmentally sustainable economy."*⁹ RCC consider it vital that this issue be

⁸ Jointly prepared by Westmeath and Roscommon County Council's and circulated to the EMRA and NWRA on 13th July 2018.

⁹ NWRA Draft RSES, page 177.

tackled in the RSES and there is no place for ambiguity in a regional policy document at this critical juncture.

In examining the Regional Policy Objectives pertaining to 'Renewable Energy' it is noted that Objectives are of a general nature, seeking to "encourage," "promote" and "support" energy generation – the same objectives are applicable to any region in Ireland or overseas. The RSES must go further, to deliver a region specific policy direction, based on the characteristics of the northern and western region and the capacity to facilitate various forms of energy generation.

Section 4.5.6 – Med Tech

- The introductory text in Section 4.5 – Sectors and Clusters¹⁰ lists 8 sectors / clusters that are emerging as being of most importance to the region. No. 5 refers to 'Life Sciences' (consisting of Med Tech., Pharma, Biotech and Healthcare). However, in the more detailed 'sector / cluster' analysis later in the chapter, the holistic 'Life Sciences' has been replaced in Section 4.5.6 by a singular focus on Med Tech activity. It fails to acknowledge other elements of life-sciences activity in the region, including for example pharmaceutical industries.

Notwithstanding the failure of Section 4.5.6 to address wider 'Life Sciences' other than just 'Med Tech,' it is noted that elsewhere in the document the contribution of 'Life Sciences' activity has been acknowledged and promoted in specific and limited locations, with particular emphasis on its role and future in Galway and in the 'Northern and Western Metropolitan Area' i.e. Letterkenny and its associated linkages to Derry and Strabane. In light of the foregoing, it is extremely concerning to note the lack of recognition afforded to established 'Life Sciences' activity in other locations, and the failure to acknowledge or support the further development of the sector in those other relevant locations. From the perspective of the further economic development of Co. Roscommon, as well as its contribution to the regional economy and the growth of Athlone as a regional centre, a clear expression of policy support for the continued development of the already established pharmaceutical activity in Monksland is essential and currently lacking.

Section 4.5.7 – Retail

- Whilst RCC welcomes the inclusion in the RSES of reference to the Roscommon Town Teams initiative as an example of best practice, its inclusion in a sub section focusing on the 'retail' sector is considered misplaced. The Town Team initiative is a much wider concept, intended to regenerate and reinvigorate towns through a range of measures, including an examination of the overall commercial offering (which includes retail but does not solely focus on it). The overall Town Team work is intended to result in a wide scale re-imagining of town centres,

¹⁰ Page 167.

through physical¹¹ and social¹² rehabilitation. RCC would request that amendments be made to include a more accurate representation of the purpose of the Town Team Initiative. It is also suggested that its inclusion (as well as that of Cavan County Council's Town and Village Revitalisation Plans) under the singular heading of 'Retail' be re-examined, as the focus and remit of the initiatives is far wider than retail.

Section 5.5 – Natural Assets

- Under the heading of 'Amenity Attractions with Growth Potential' (pg. 209), reference is incorrectly made to "Lough Ree Forest Park, Co. Roscommon." It is essential that this error is rectified to accurately include the correct title of Lough Key Forest and Activity Park.

Section 5.7 – Our Natural Heritage

- The Draft RSES Table of Contents denotes Section 5.7 as 'Built Heritage' rather than 'Our Natural Heritage' as appears on page 212.
- This section is heavily focused on OPW operated sites, and as a result fails to make reference to other renowned features in the region – the Rathcroghan Complex in Co. Roscommon is such an example, containing an extensive range of archaeological monuments of major national significance. The inclusion of wider references in this section would be welcomed.

Section 6.5 – Road Network

- The Draft RSES notes that the NPF and the National Development Plan "*strongly acknowledge that accessibility from the northern and western region of Ireland and between centres of scale separate from Dublin will need to be significantly improved....*" RCC acknowledge that works on the N61 (which connects the Regional Centres of Athlone and Sligo, via Roscommon and Boyle) are not identified in the National Development Plan, and as a result would appear to be included in the RSES's Regional Policy Objectives for National Roads only as a project to be delivered in the medium term. RCC consider this to be regressive and inconsistent with the priority level previously attached to the N61 in the *Planning Guidelines for the West Region 2010-2022*, wherein the reclassification and upgrading of both the N60 and the N61 were included amongst the list of key investment priorities¹³ deemed necessary for the sustainable development of the region.

Notwithstanding the omission of the N61 from mention in the National Development Plan, it is imperative that the role of the route as the main road connection between two of the

¹¹ Public realm improvement / backland redevelopment / property refurbishment / increasingly diverse use mix.

¹² Increased residential occupancy / mix of house and other uses / increased employment opportunities / improved community facilities etc..

¹³ *Planning Guidelines for the West Region – Section 1.5.3.*

regional centres in the northern and western region is adequately recognised and its upgrading promoted in the RSES.

- As noted in the recently submitted joint submission to the NWRA from Westmeath and Roscommon County Council's, the NWRA's Draft RSES fails to refer to the M6 / N6 in the vicinity of Athlone. It is essential that this is highlighted in the RSES, as capacity constraints resulting from existing junction / interchange arrangements may adversely impact on the growth potential of the Athlone West area in particular, and also on the overall growth of Athlone as a regional centre. RCC had also highlighted this issue to the NWRA in the course of previous engagement at an earlier stage in the RSES preparation process – please refer to extract below:

"In order to ensure that the Athlone West area has the potential to grow as set out above, it is essential that any perceived infrastructural constraints, particularly in relation to the road network i.e. junction capacities and consequent impacts on the M6/N6, are addressed and resolved. Co-operative engagement between TII and the constituent local authorities will be essential in this regard."
