

Sligo County Council's Submission on the Draft Regional Spatial and Economic Strategy

5 February 2019

A. Recognition of Sligo's regional role

1. Regional Growth Centre designation

Sligo County Council welcomes the "Regional Growth Centre" designation for Sligo and the inclusion of an associated Strategic Plan in the Draft Regional Spatial and Economic Strategy (RSES). This designation is in accordance with Sligo's identification as a regional centre in the National Planning Framework (NPF).

The Council notes the Northern and Western Regional Assembly's commitment, as expressed in **Section 3.4 Urban Places of Regional Scale** (p. 58-60) of the Draft RSES, to "*focus on the significant growth of the urban places of Galway, Letterkenny, **Sligo** and Athlone*".

2. Population growth targets

The Draft RSES identifies a population growth target of at least 40% in Regional Centres such as Sligo, balanced by growth in the county at a level to be determined locally.

The above target would see Sligo Regional Growth Centre (RGC) attain a population of 22,350 by the year 2026, 23,950 by 2031 and possibly 26,900 by 2040.

Population projections for County Sligo (presented on p. 26 of the Draft RSES) indicate an increase of over 10,000 by the year 2031.

While they seem ambitious, the County Council is satisfied that the population targets are achievable, subject to appropriate investment in infrastructure and support for economic development in the Regional Growth Centre and in the county's smaller towns and rural areas.

3. Support for economic development

Located within the Atlantic Economic Corridor and on the route of the Wild Atlantic Way (WAW), Sligo is the most obvious large regional centre that should be supported by the RSES to achieve its growth potential in terms of employment and economic development.

The Council welcomes the Draft RSES's attention to Sligo as expressed in the following sections:

- Regional Tourism Strategy (Section 4.5.1) identifying Sligo as a "Candidate Destination Town" along the WAW;
- Med Tech (Section 4.5.6) identifying the emerging med-tech cluster in Sligo;
- Retail (S. 4.5.7) highlighting the contribution of Sligo BID;

- Digital infrastructure (Section 6.10) announcing the imminent establishment of Technology and Innovation Poles (TIPs) in Regional Growth Centres such as Sligo;

It is considered, however, that a stronger focus on the economy of Sligo RGC is required.

This should be achieved by amending certain Regional Planning Objectives (RPOs) or by the introduction of additional RPOs, particularly in the Tourism section (development of a substantial tourism attraction in Sligo RGC), in the Retail section (recognition of Sligo's regional retail function as recognized in the Retail Planning Guidelines 2012) and in the Marine & Blue Economy section (S. 4.5.4), which should support the continued operation of Sligo Port and its adaptation for tourism purposes. (Refer to Section C of this submission for proposed amendments to RPOs).

4. Prioritised investment in infrastructure

In terms of regionally-important infrastructure, the Draft RSES prioritises the preparation of a Transportation Strategy (Section 6.2) and a Local Transport Plan for Sligo Town (Section 6.9). This is welcomed.

It is considered that both the Transportation Strategy and the Local Transport Plan should cover not just Sligo Town, but the entire area of the RGC, which extends to include the nearest commuter/satellite villages of Ballysadare, Rosses Point and Strandhill and surrounding rural areas.

Road infrastructure

The Council welcomes the RPO 111 relating to critical enabling projects such as the Eastern Bridge and Approach Roads and the Western Distributor Road. Other relevant RPOs are 108, 109 and 112, which refer to the planned improvements to the national roads N4, N15, N16 and N17. Minor amendments to some of the RPOs are proposed in Section C of this submission.

Rail

The Draft RSES indicates that “there is scope for further improvements to be made to existing rail services, connecting the Galway, Castlebar/Ballina and Sligo lines to Dublin and the rest of the Irish rail network” (Section 6.6, p. 232).

Sligo County Council welcomes the Regional Assembly's support for an independent review of the Western Rail Corridor, as stated on p. 233 of the Draft RSES.

At the same time, the NWRA should consider whether the wording of RPOs 113 and 115 could be pre-determining the outcome of the review of the Western Rail Corridor.

Greenways

Sligo RGC Strategic Plan (Section 3.6.C, sub-section 3.5.5. Green link south to potential future greenways) indicates that – subject to feasibility – Sligo County Council supports the development of greenways as follows:

- on or alongside the closed railway line from Collooney to Bellaghy (Sligo/Mayo county boundary), insofar as the greenway does not compromise the reopening of the Western Rail Corridor, if the reopening of the railway line is deemed feasible
- on or alongside the abandoned railway line from Collooney to Enniskillen (SLNCR)

It is considered that these proposed greenways are fully in accordance with the RPOs 94 and 95, in that they have significant potential to be extended and linked with other routes (including cross-border) and to deliver an increase in tourism activity.

The NWRA should carry out a thorough review of all its regional policy objectives, to ensure that they do not preclude or pre-determine the outcome of any **independent** feasibility studies regarding the tourism or transport potential of regional routes and corridors.

Gas

Sligo County Council welcomes the NWRA's support for the "build out of the gas supply network" into County Sligo, as expressed in RPO 191 (Section 8.4, p. 279)

However, the Strategic Plan for Sligo (included in Chapter 3) suggests a short-term alternative to network extension: the development of a local gas network, independent of the national network and fed with compressed gas delivered by road.

The Council suggests that RPO 191 be amended to make provision for Sligo's independent gas network proposal.

Water supply

Two water supply projects necessary to deliver the future growth of Sligo are identified in the Draft RSES (Section 8.5 Water services infrastructure) – Sligo and Environs Water Supply Scheme and Lough Talt Water Supply Scheme.

While the issues associated with the Lough Talt WSS are currently being addressed via a planning application, it is not clear what is meant by "Sligo and Environs Water Supply Scheme".

At present, there are several supplies serving Sligo Town and the surrounding rural areas. These have been upgraded in recent years.

What Sligo RGC needs is an extension of the water supply network (e.g. water mains), as well as the sewer network, to service lands that have been already zoned for urban development.

However, it is considered that the provisions of RPO 196 are sufficient in regard of water supply and drainage infrastructure.

5. Cross-border connections

The mention of Sligo in the context of all-island cohesion is only marginal, in the context of road connections linking Letterkenny with other urban centres. This is not acceptable to Sligo County Council, which has long been a member of ICBAN (Irish Central Border Area Network).

The Draft RSES paragraph on the Central Border Region focuses on Cavan, Monaghan and local authority areas in Northern Ireland, with Sligo getting another marginal mention.

There is no reference to Sligo under either Mobility or Tourism in Section 9.3 (Co-ordination of investment in infrastructure), despite the fact that the Sligo RGC Strategic Plan in Chapter 3 proposes:

- a greenway from Collooney in Co. Sligo to Enniskillen in Co. Fermanagh along the SLNCR (abandoned railway)
- upgrading and realigning the national road N16, which is considered a strategic cross-border route from Sligo through Enniskillen to Dundalk.

Sligo County Council recommends the inclusion of a more detailed sub-section on the Central Border Area, together with an additional RPO supporting the development of cross-border links such as the strategic road N16/A4 and the SLNCR greenway.

B. General observations

6. “Regions” and “Sub-regions”

The Northern and Western Region is not homogenous. The existence of sub-regions has been long recognized and acknowledged in previous Regional Planning Guidelines, which provided adequate maps or diagrams showing the general location and size of these sub-regions.

While Map 1.1 on p. 5 of the Draft RSES attempts to illustrate the sub-regions, its title is inadequate (“Sub Regional Examples”), the six areas are significantly distorted and their names are incorrect.

For example, the Sligo Sub-Region is depicted smaller than the actual catchment or zone of influence, and it is called “Sligo & Environs”, which is the name of the last development plan for the main urban centre of the county.

Sligo County Council recommends that the Context section in Chapter 1 of the Draft RSES reflects correctly the extent of the six sub-regions as identified on p. 163 in Section 4.3 (Place based assets).

A large, clear map or diagram, with correct names and an adequate title, should also be prepared and inserted early in the RSES.

Finally, throughout the document there should be consistency in the use of the words “region” and “sub-region”, in order to avoid confusion such as that caused by the map on p. 31 (which labels “Letterkenny Derry Strabane Region”, “Galway Region”, “Athlone Region” but leaves out Sligo altogether).

7. Consistency between RGC Strategic Plans

Sligo County Council welcomes and strongly supports the inclusion of a Regional Growth Centre Strategic Plan for Sligo in the Draft RSES.

The Council notes that the Sligo RGC Strategic Plan generally follows the structure recommended by the NPF and reproduced on pages 16 and 28 of the Draft RSES.

This is not the case with the two other Regional Growth Centres of Athlone and Letterkenny.

While the Draft RSES allocate just two pages to Athlone RGC, there are no less than 26 pages on Letterkenny RGC, which also appears to “incorporate” the “North West City Region Metropolitan Area Strategic Plan”. The Letterkenny section is larger even than the Galway Metropolitan Area Strategic Plan (13 pages).

In the interest of balance and clarity, Sligo County Council recommends that the sections containing the three RGC Strategic Plans be revised in order to ensure that they all follow the NPF-suggested structure and they have similar “weights” in terms of text and graphics.

In particular, the Letterkenny RGC Strategic Plan should be disentangled from the cross-border city-region MASP and placed in its own section.

Each RGC Strategic Plan should be accompanied by an infographics page similar to the “Summary insights” for Galway (p. 69) and to the geo/demographics produced for the Key Regional Towns.

Sligo County Council also recommends that each RGC Strategic Plan include a small number of specific, targeted objectives linked to, or in addition to the existing draft RPOs.

8. Cross-border co-operation

In the context of all-island co-operation, the Draft RSES does not appear to reflect the actual importance of the long-standing cross-border links, with the notable exception of the section on the “North West City Region Metropolitan Area Strategic Plan”.

The need to promote cross-border collaboration and partnership is now even more acute, given the potential problems arising from Brexit.

It is suggested that Chapter 9 is revised to better reflect the special character of the Border, in particular the Central Border Area/ICBAN. Existing, ongoing and planned cross-border projects should be strongly supported by the RSES, which should take into account Northern Ireland’s Regional Development Strategy 2035 (RDS).

The RDS 2035 recognises the economic significance of the Central Border area in designating Enniskillen as the “South-West Gateway with strategic links to Sligo”. The RDS 2035 states that “Enniskillen has an Inter-regional Gateway function, being only 1 hour drive from Sligo on the main transport route. There are opportunities for Enniskillen and Sligo to work together to provide services on a cross-border basis.”

The RSES must therefore include appropriate provisions to take advantage of these opportunities for cross-border partnership, particularly in addressing the challenges to be posed by Brexit.

Sligo County Council recommends the inclusion of an additional RPO in Chapter 9, to support the upgrade of the N16 in the interest of enhancing inter-regional accessibility and to ensure consistency with the RDS 2035, which designates this route as a Key Transport Corridor.

9. Draft document size and structure

The Draft RSES is extremely lengthy – 300 pages without any Appendix or References.

By comparison, the National Planning Framework is only 170 pages long, including four Appendices.

It is considered that the RSES should be revised to make it more concise and reader-friendly.

Extensive quotes from the NPF or other policy documents should be eliminated, keeping only the absolute minimum required explanations.

A substantial number of images could also be eliminated without prejudice, particularly slides or diagrams that serve no clear purpose (see the title-less diagram on p. 19, for example, or “the global goals” on p. 22, some reproductions of slides with illegible text etc).

Regional Policies vs. Regional Objectives

The number of “Regional Policy Objectives” (RPOs) is also nearly three times larger than the National Policy Objectives – 211 RPOs in the Draft RSES compared to 75 NPOs in the NPF.

It is noted that the majority of the RPOs are in fact “policies”, in that they express a general intention or aspiration, whereas a minority of RPOs are real “objectives”, i.e. specific, targeted, achievable, some even measurable and time-bound (e.g. road improvement objectives), which will facilitate monitoring of implementation.

For example, “nurturing of world class infrastructure and competitive services with capacity, resilience and quality” (RPO 4 on p. 55) cannot be considered a SMART objective (specific, measurable, achievable etc.), but could be seen as an aspiration, i.e. a policy.

On the other hand, RPO 111 is a genuine SMART objective:

The following regional and local roads shall be progressed to an appropriate level of service in the short term and in any case by 2027:

- *Garavogue Bridge Scheme, Sligo*
- *Sligo Western Distributor Road.*

It would be a good idea to separate the draft RPOs into “Regional Planning Policies” (RPPs) and “Regional Planning Objectives” (RPOs), with only the latter being subject to monitoring over the life of the RSES.

C. Proposed amendments to draft Regional Planning Objectives

Proposed deletions are shown in red, proposed additions are shown in blue.

➔ Regional Planning Objective 27 (p. 172)

*That the Wild Atlantic Way (WAW) touring network and visitor attractions within the Region shall be upgraded and improved to cater for the growth in visitor cars, buses, and cyclists using the route. **At least one tourist attraction of scale shall be established in Sligo Regional Growth Centre.***

➔ Regional Planning Objective 63 (p. 191)

(a) To examine the potential of the Region's other main ports to expand, and enhance facilities to enable them to become ports with enhanced Regional significance in a range of areas, including trade, fisheries, marine tourism and renewables

(b) To support the continued operation of Sligo Port and its adaptation for marine tourism and other opportunities, in conjunction with the development of the Regional Growth Centre.

This will be done in conjunction with all relevant stakeholders, including the relevant Local Authorities, and within the context of the MSP.

➔ Regional Planning Objective 67 (p. 197, the second "67")

*Support funding opportunities for **growing med-tech companies and** indigenous start-ups **that wish to locate in Sligo, in order to consolidate the existing med-tech cluster.***

➔ Regional Planning Objective 73 (p. 199)

*To support retail **development** in the **Regional Growth Centres of Sligo, Athlone, and Letterkenny, and in the urban centres with regional retail functions, Ballina, Cavan and Monaghan, town and village centres through based on** the sequential approach, as provided within the Retail **Planning** Guidelines, and to encourage appropriate development formats within **the other** town and village centres.*

➔ Regional Planning Objective 109 (p. 231)

The following projects shall be progressed ...

- N17 from N4 interchange to **N5 interchange Knock By-Pass**

➔ Regional Planning Objective 110 (p. 231)

The delivery of the following projects shall be pursued...

- N59 enhancement (N59 Westport to Mulranny; N59 Ballina to Crossmolina; N59 Ballina Relief Road; N59 Oughterard By-pass; N59 Clifden to Oughterard; **N59 Ballina to Ballysadare**)
- **N16 Sligo to Blacklion**

➔ **Regional Planning Objective 112 (p. 232)**

*The East-West (Dundalk to Sligo) Road will be pursued incrementally in the short and medium term, to be delivered to an appropriate level of service (Dundalk - Carrickmacross – Shercock – Cootehill – Cavan - Enniskillen - N16 at Blacklion – **Manorhamilton - Sligo**. Furthermore... (etc)*

➔ **Regional Planning Objective 126 (p. 235)**

Support Cross-border sustainable transport, including but not limited to the delivery of the following:

- *North-West Multi-modal Mobility Hub;*
- *North-West Greenway; **and***
- *Ulster Canal Greenway;*
- ***SLNCR Greenway (Sligo-Leitrim-Northern Counties Railway)***

➔ **Regional Planning Objective 128 (p. 236)**

*The Assembly supports the collaborative preparation Local Transport Plans lead by local authorities and including other stakeholders for **the Regional Growth Centres of** Athlone, Letterkenny **and** Sligo **Town, for** Cavan Town, Monaghan Town, Castlebar, Roscommon Town, Ballinasloe, Carrick-on Shannon, Donegal Town, Tuam, Ballina and other areas as may be determined.*

➔ **Regional Planning Objective 191 (p. 279)**

(a) To support the build out of the gas supply network into Counties Sligo, Roscommon, Donegal and Leitrim and in additional locations in the remainder of the region

*(b) **As a short-term alternative to network extension, support the development of a local gas network in the Regional Growth Centre of Sligo, independent of the national network and fed with compressed gas delivered by road.***