

08 February 2019
Delivered by email

RSES Submissions,
NWRA,
The Square,
Ballaghaderreen,
Co. Roscommon,
F45 W674

Dear Sir/Madam,

REPRESENTATION TO THE DRAFT REGIONAL SPATIAL AND ECONOMIC STRATEGY – PUBLIC CONSULTATION

Introduction

This representation has been prepared by Turley, on behalf of our client, Magim Ltd, in response to the publication of, and formal consultation on, the Northern and Western Regional Assembly's (the NWRA) Draft Regional Spatial and Economic Strategy (the DRSES).

Our client welcomes the publication of the DRSES consultation document, and the progress that the NWRA is making towards adopting a RSES.

By way of some background, our client owns approx. 30 ha of land in the Carnamuggagh area of Letterkenny, which is currently zoned 'Strategic Residential Reserve' and 'Local Environment' in the County Donegal Development Plan 2018-2024 (the CDDP). We were instructed early last year to engage with the Letterkenny Local Area Plan (the LLAP) process and to make a detailed submission to the initial consultation stage of the LLAP, in June 2018. Our representation, entitled 'Carnamuggagh Neighbourhood Hub', sought to secure the rezoning of Phase 1 and 2 of our client's land as 'Primary Residential' and Phase 2 as 'Strategic Residential Reserve' (this representation has been attached to this email submission to the DRSES).

Since this submission was made, we have continued to liaise with the LLAP plan making process, on behalf of our client, and we attended a 'round the table' meeting with Donegal County Council, the LYIT and the IDA so as to discuss the potential of developing a joined up approach to the development of the Carnamuggagh/ Knocknamona/ Lisnennan area of Letterkenny. This was a truly productive meeting and it was agreed that each party would share its respective masterplan so as to review the potential of preparing an overall high level masterplan for the area and agree on shared principles noting the symbiotic and complementary relationship between housing, jobs and education.

Indeed, the driving vision for the Carnamuggagh/Knocknamona/Lisnennan area of Letterkenny is to create a neighbourhood of choice that is fit for, and supports the growth of Letterkenny as, a Regional Centre and where people can live, learn, work and play. A follow-up meeting took place in mid-January 2019 between the respective parties (i.e. Turley obo Magim Ltd, the IDA and the LYIT). This follow-up meeting provided an opportunity to share information, clarify the approach moving forward and obtain further 'buy in' with respect to the joined up and collaborative approach.

Consequently, we are now in the process of stitching together each of the respective masterplans so as to prepare an overall high level masterplan and we are also preparing a common development principles document which we

will share with Donegal County Council by the end of February 2019. This overall high level masterplan will be presented to the Council's Forward Planning team and it can also be presented to the Council members and even members of the public, if considered helpful, so as to inform the emerging LLAP.

Additionally, and noting the strategic/regional importance of the parties involved in this collaborative and joined up approach, we respectfully request an opportunity to present the overall high level masterplan for the Carnamuggagh/Knocknamona/Lisnennan area to the NWRA, or perhaps the NWRA's officers could attend our presentation to the Council. If this is something that the NWRA would find useful, particularly noting the key messages contained in the Draft RSES with respect to place making and place shaping, please do not hesitate to contact us.

Draft Letterkenny Regional Growth Centre Strategic Plan

Our client is encouraged by the presence of the Draft Letterkenny Regional Growth Centre Strategic Plan (the DLRGCSP) in the Draft RSES, and recognises both the potential of the North West City Region, and the importance of Letterkenny to it, which is identified as being the fourth largest urban agglomeration on the island of Ireland. Our client is equally aware of the challenges that face this city region, being the only functional economic region of such scale in Ireland which experiences a national jurisdiction border.

The need for a Metropolitan Area Strategic Plan for this city region, which will provide a consistent and long-term approach to co-ordinating the development of the region, and the need for continued cross border collaboration with the relevant authorities, which is supported by the strategic regional planning tier, is clear. Furthermore, the need for a strategic plan to ensure that the future development of Letterkenny aligns with and complements the vision and ambitions of the North West City Region is also accepted.

When adopted, the NWRA's RSES will form part of the strategic regional planning tier in Ireland, along with the SRA's RSES and the EMRA's RSES. Together, the three RSES are tasked with bridging the national policy objectives of the National Planning Framework (the NPF) with the local level of plan making. At this strategic level, the three RSES will put in place policies and recommendations that will better manage regional planning and economic development.

In essence the three RSES will add the 'meat to the bones' of the NPF and they will set out priorities and growth levels which local development plans and their core strategies will need to be consistent with. It is important then that the hierarchy of plans/plan making in Ireland is clear in the NWRA's Draft RSES and its DLRGCSP.

Having reviewed the DLRGCSP, our client's overall reaction is positive. However, some concern has emerged with respect to the strategic mapping images of Letterkenny which are reproduced in the DLRGCSP, particularly the images appended to this submission (please see Appendix 1). This concern is further compounded noting that the LLAP, which is set to supersede the Letterkenny section of the CDDP, is yet to go through its formal consultation stage, i.e. the adoption of the draft plan by Council members and the publication of the draft plan for public consultation.

Our client is justifiably anxious that the inclusion of the identified strategic plan images, which have not been through the due process associated with local area plan making in Ireland, could: give special status to certain parts of the town/plans for the town; prejudice both the Draft RSES process and the LLAP process; and be interpreted as the local 'tail' wagging the regional 'dog'.

The DRSES and the DLRGCSP should ensure that the hierarchy of plans/plan making in Ireland is clear and should seek to set out the relevant strategic vision, policy, and objectives for the local level and provide the necessary guidance to ensure that the local level will align with and help to achieve the national policy objectives.

In light of this, our client respectfully requests that the NWRA remove any plans or images (particularly those contained in Appendix 1) which could be seen to prejudice the regional and local plan making processes, or which could confuse the hierarchy of plans and plan making in Ireland, from the Draft RSES and the DLRGCSF.

Population Projections

Our client has also asked us to review the population projections for Letterkenny contained in the DRSES. As part of this instruction, we have also reviewed the population projections that are provided for both Letterkenny and Donegal in the DHPLG's 'Project Ireland 2040 Implementation Roadmap for National Planning Framework' (July, 2018) and in the CDDP 2018-2024.

As you will be aware, the national, regional and local population projection information is not entirely consistent, as summarised below, and as evident in the excel table submitted in support of to this representation:

- the national projections provide information for Donegal but not Letterkenny and the years covered are 2026 and 2031;
- the regional projections provide information for Letterkenny but not Donegal and the years covered are 2026, 2031 and 2040; and
- the local projections provide information for both Letterkenny and Donegal and the years covered are 2024 and 2038.

The above inconsistencies have made reviewing and identifying any potential anomalies difficult, but it is helpful that each of the sources of information have the same starting point, i.e. 2016. The approach adopted, as evident in the attached excel table, was to prepare two tables, one for Donegal (i.e. Table A) and one for Letterkenny (i.e. Table B), insert the population projections figure (in red) provided by each source under the respective year and then using an average pro-rata growth figure for each intervening year so as to arrive at the projected population increase.

This approach is a straight line growth model which assumes the same level of population growth for each year. While it is not a perfect science, it allows us to compare/cross-reference the expected population growth for each year according to each source. The tables in the attached excel document show a breakdown of the population projections which range from 2016 to 2040, however, for the purposes of our client's interest, this representation focuses on the 6 year timeframe of the CDDP and the emerging LLAP, i.e. 2018-2024.

It is important, noting that the DRSES does not provide a population projection figure for Donegal, to acknowledge at this point that the CDDP's population projection for Donegal, i.e. to grow from 159,000 to 173,000 people by 2024, aligns with and is consistent with the higher end of the population projection range set out in 'Project Ireland 2040 Implementation Roadmap for National Planning Framework', as demonstrated in Table A of our the attached excel table.

However, an irregularity appears when we compare the DRSES's 2024 population projection figure for Letterkenny with that of the CDDP's 2024 population figure, i.e. 21,820 people v 23,492 people, which is a difference of 1,672 people. Using the average household size, which is 2.7 people/household as per Census 2011 (see Table 2A.6: The Core Strategy Table of the CDDP – pg. 22) this converts to approx. 620 houses. Using the applied density of housing for Letterkenny, which is 20 units/ha (again see Table 2A.6: The Core Strategy Table of the CDDP – pg. 22) this breaks down to a difference of approx. 31 hectares of land, which is quite a significant difference.

The DRSES (pg. 59) states that '*The National Planning Framework provides a target growth rate for Galway of between 50-60% and that the RSES identify the target growth rate of the Regional Centres of Athlone, Sligo and Letterkenny*'. The DRSES then confirms that '*Targeted growth in the Regional Centres and the network of Key Towns*'

*will take the lead in a regional context. In order to address the weak urban structure it is necessary to target **growth of the Regional Centres by at least 40%** and the Key Towns to have a targeted growth of at least 30%' (**our emphasis**).*

It is noted that both the DRSES and the CDDP have the same (approx.) starting population for Letterkenny in 2016, i.e. 19,300 and 19,302, respectively. The DRSES approach is to grow the population of Letterkenny by 40% of its current population, while the CDDP approach is to grow the population of Letterkenny by 30% of Donegal's overall forecasted growth by 2024, i.e. 172,723 (see Table 2A.1: Population Targets of the CDDP, pg. 12 and Table 2a.2: Targeted Distribution of Growth for Housing Land Supply of the CDDP, pg. 15).

As mentioned above, the CDDP figure for Donegal's growth to 2024 aligns with, and is consistent with the higher range figure provided at the national level, which would be the expected approach for a Regional Centre like Letterkenny. However, for comparison, if we use the CDDP approach and take the lower end figure for Donegal in 2024 provided at the national level, i.e. 170,600 then Letterkenny's population would be expected to grow to 22,856 by 2024 (i.e. $170600 - 158,755 = 11,845 / 100 * 30 = 3,554 + 19,302 = 22,856$).

The conservative population scenario would still lead to a higher population for Letterkenny than what is expected in the DRSES by 2024, i.e. 22,856 v 21,820. This difference, of 1,036 people (using the same calculations used previously for the ambitious growth scenario), would lead to a difference of 383 houses or 19 hectares of land zoned for housing. Again, this is quite a significant difference.

At the minute, assessment of the population projections is a bit of an 'apples and pears' comparison exercise, and the DRSES would appear to be the best vehicle through which to make the population projections at national, regional and local level consistent and clear.

We would also question if the DRSES approach of growing the population of Letterkenny by 40% of its existing population by 2040 is the correct approach to ensuring that the appropriate and necessary level of growth is directed to this Regional Centre, or if it properly takes into account Donegal's overall population 'cake'.

Would taking and applying 40% of the overall population 'cake' for Donegal, as identified by the DHPLG's 'Project Ireland 2040 Implementation Roadmap for National Planning Framework' be a better way to ensure that Letterkenny's regional status and role is supported and maintained? Indeed, this approach would lead to a more ambitious population growth of between 4,640 – 5,600 people by 2024 for Letterkenny, which is more than what is envisaged in the CDDP, i.e. 4,190 people, and the DRSES's, i.e. 2,520 people.

Conclusion

Our client welcomes the publication of the DRSES consultation document, and the progress that the NWRA is making towards adopting a RSES.

However, our client respectfully requests:

- an opportunity to present to the NWRA the joined up and collaborative masterplan and development principles document for lands owned by Magim Ltd, the LYIT and the IDA in Letterkenny;
- that the NWRA remove any plans or images (particularly those reproduced in Appendix 2) from the DRSES and DLRGCSF which could be seen to:
 - prejudice the regional and local plan making processes with respect to the LLAP;
 - confuse the hierarchy of plans and plan making in Ireland;

- give special status to certain parts of/plans for Letterkenny which have not been consulted upon; and which could be seen to
- be interpreted as the local ‘tail’ wagging the regional ‘dog’.
- that the NWRA review the population projections set out within the DRSES, address the apparent anomaly and ensure that there is a clear and consistent integration of population projections at the national, regional and local tiers;
- that the NWRA review the DRSES approach of growing the population of Letterkenny by 40% of its existing 2016 population by 2040 and confirm (potentially providing reasons) if this is the appropriate methodology for ensuring that the necessary level of growth is directed to this Regional Centre; and/or if it properly takes into account Donegal’s overall population ‘cake’; and
- that the NWRA review the potential of applying 40% of the overall population ‘cake’ for Donegal, as identified by the DHPLG’s ‘Project Ireland 2040 Implementation Roadmap for National Planning Framework’, to Letterkenny as a means to ensuring that Letterkenny’s important and strategic regional status, function and role is supported and maintained.

Please do not hesitate to contact me to discuss this representation.

Yours sincerely,

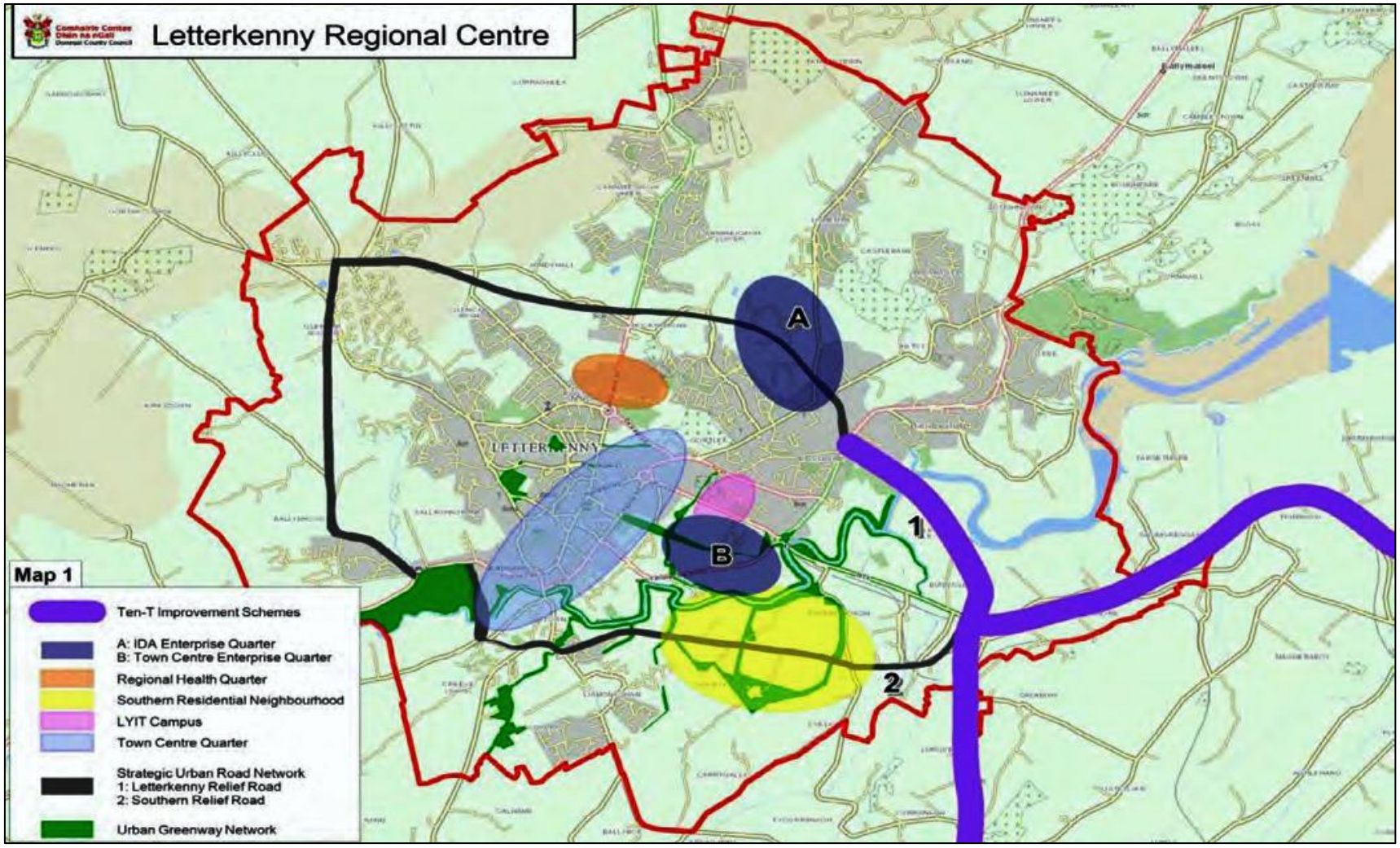


Brian Kelly
Director



APPENDIX 1 – Extracts from the Draft Regional Spatial and Economic Strategy

Extract showing a map contained on pg. 89 of the Letterkenny Regional Growth Centre Strategic Plan



Extract showing a map from pg. 95 of the Letterkenny Regional Growth Centre Strategic Plan

