



8th February 2019

RSES Submissions,
Northern and Western Regional Assembly,
The Square,
Ballaghaderreen,
Co. Roscommon

**RE: Draft Regional Spatial and Economic Strategy for the
Northern and Western Regional Assembly**

A Chara,

I am directed by the Minister for Housing and Urban Development to refer to your recent letter in relation to the above and set out hereunder observations on behalf of the Minister.

The Department welcomes the publication of the Draft Regional Spatial and Economic Strategy (RSES), which will address the national policies and objectives of the National Planning Framework (NPF) at a regional scale. The RSES for the Northern and Western Regional Assembly area will provide a clear strategic direction for the formulation of subsequent county/city development plans and ensure a strong and consistent alignment between national and local level planning policies.

The Assembly is to be commended for the extensive preparatory work undertaken in producing the Draft RSES. The Department considers the Draft RSES to be a comprehensive framework for the future development of the Assembly area, in terms of settlement, employment and enterprise, infrastructure provision and the environment. The proposed strategy importantly reflects the diversity, challenges and opportunities in the differing parts of the region.



The Strategy is effective in terms of compact growth and urban focus, in support of the policies and objectives of the NPF. The Strategy has included a sub-regional map, which is reasonable and articulates the variances and similarities throughout the North West Region.

The regional settlement structure of the region is outlined on pages 59 and 60 of the Draft Strategy. This settlement strategy broadly provides a strong regional structure to accommodate future employment and housing growth. The region has identified one Metropolitan Area Strategic Plan covering the Galway area, three Regional Growth Centres (Letterkenny, Sligo and Athlone), and eight Key Towns. The Department considers this an appropriate number of regionally distributed centres that will ensure the required focus for an increased scale of development needed to sustain a strong and vibrant regional settlement structure.

Regenerating important regional towns that have derelict or underutilised sites will be best achieved where the sequential test is applied and the focus is firmly placed on actively developing such sites within existing town cores. The table on pages 59 and 60 of the Draft Strategy would benefit from a clear title referring to the 'hierarchy' of Plans and Settlements and numbered.

Section 3.5 of the Strategy highlights the rural nature of the Northern and Western Region as a whole with 80% of the population living in rural towns, villages and the countryside. While the policy objectives supporting rural management are welcomed, further emphasis could be given to the rural dimension for villages and the countryside either within section 3.5 or section 3.7.9 *Other Rural Areas*. It may also be appropriate to retitle section 3.7.9 as for example; Rural Communities, and cross reference with section 3.5. The Assembly may wish to include additional policy supports in the RSES to assist and facilitate future rural development and employment growth as an essential element of the development strategy.

The delivery of compact growth is effectively set out through a strategic focus on each settlement structure. Sections 3.6(a) to 3.6(d) outline these approaches through the Galway Metropolitan Area Strategic Plan (MASP) as mandated by the National Planning



Framework, Letterkenny Regional Growth Centre Strategic Plan, Sligo Regional Growth Centre Strategic Plan and Athlone Regional Growth Centre Strategic Plan. While the Department endorses the provision of these strategic plans, there could be enhanced cohesion and continuity throughout, in terms of strategy structure, headings and identification of policy objectives for each sub-section.

The integration of the Galway MASP growth strategy with the relevant strategic transport plan and identification of opportunity sites is positive. However, there is a need to ensure the approach to the Region's City (Galway) and three Growth Centres is more evenly focused, as currently there are elements that are somewhat divergent in focus and extent.

The Department suggests that this could be satisfactorily addressed through clarification and adjustments to the following strategic plans:

- Letterkenny Regional Growth Centre Strategic Plan. There are a number of elements to this plan that may cause confusion. Section 3.4 identifies Letterkenny as a Regional Growth Centre. However, throughout section 3.6(b), the metropolitan area and North West city region as well as Letterkenny regional centre are identified. If it is intended to incorporate elements of a metropolitan plan for the North West, to avoid ambiguity, this should be recognised and clarified within the hierarchal table on page 59. It would also be of benefit to identify this region in a spatial context within section 3.6(b).
- Both the North West Metropolitan Area and Letterkenny Regional Centre would benefit from specific targeted policies and text such as identifying specific areas for growth, development opportunities, significant land holdings, brownfield lands etc. as has been identified for Galway and Sligo. While the table on page 93 outlining the projects to be undertaken for the Donegal region and timelines is useful, these projects should be elaborated on, embedded within the text and aligned to the policy objectives of the National Planning Framework.



- In order to assist the streamlining of Section 3.6(b) and Section 3.6(d), the Department would suggest the approach taken in formulating the Sligo Regional Growth Centre Strategic Plan (section 3.6(c)). The Sligo Plan, after each series of policy objectives poses the question; How can this be achieved?, and in response, sets out how it is intended to achieve the objectives. This is an effective means of focusing the content of the plan succinctly and efficiently. Letterkenny, Athlone and to a degree, Galway, could benefit from this approach.
- The Athlone Regional Growth Centre Strategic Plan needs further elaboration and input specifically pertaining to the 'whole' of Athlone. While the Department recognises that the Northern and Western Region includes only the Monksland and Bealnamulia areas of Athlone a more holistic approach should be taken to take into account the corresponding strategy for the remainder of Athlone, by way of collaboration with the Eastern & Midland Regional Assembly (EMRA) and the relevant draft EMRA RSES. This is also being communicated to the EMRA.
- In addition, the Department recommends removing from the text of the RSES (page 136) reference to a quantum of land identified within the Monksland Local Area Plan as 'residential reserve'. The identification of this land in the absence of a co-ordinated regional approach, is considered premature. The RSES should confine any quantum of land identified in this regard, to the New Residential zoning category.

It is noted that the review process of individual county/city development plans by the relevant planning authorities, will follow the adoption of the RSES for the Northern & Western Region in order to ensure these statutory plans align with the RSES and ultimately the NPF. In this regard, it would be greatly beneficial to include, as an appendix, the future county population growth figures— per the *'Implementation Roadmap for the National Planning Framework'* (July, 2018). This schedule provides clear and unambiguous population growth parameters for the preparation of individual core strategies by the constituent local authorities in their subsequent development plans.



It would also be opportune to include policy objectives relating to Development Plans and their Core Strategies within the RSES. For clarity, it is suggested that policy objective(s) to this effect reiterating the overarching requirement for core strategies to adhere to the RSES and ensure that infrastructural investment to support future development shall be closely spatially aligned to the RSES are incorporated into Section 3.0 of the Draft RSES.

The following are a number of minor presentational and illustrative suggestions for the Assembly to consider to, that would assist in clarifying aspects of the Draft RSES proposed.

- The Northern Ireland element of the map on page iv could be better defined, e.g. by inclusion of the county boundaries;
- To ensure clarity and legibility all tables/diagrams/figures should be titled and numbered throughout the document;
- The document would also benefit from cross-referencing between sections, particularly Sections 2.0 and 3.0.
- The RSES is a lengthy document and while useful for the consultation phase, the Director's View and details of the Assembly Executive on page iv should not be necessary in addition to the overall Cathaoirleach's Foreword, as they will serve to date what is intended to be a 12-year strategy. This would be better set out in correspondence accompanying the final publication.

Finally, it is not considered appropriate that an EU flag or logo would appear on the cover of a Regional Spatial and Economic Strategy document. This could give the impression that the RSES is an EU document or an EU-sponsored publication, which would be misleading. The EU has no direct competence in respect of Regional Spatial and Economic Strategies, which are prepared in the context of Irish statute and the National Planning Framework and the National Development Plan, as part of Project Ireland 2040.

I look forward to the progress of the Draft Regional Spatial and Economic Strategy through the statutory RSES process, which will enable county and city development plans to be subsequently revised and updated, where necessary. These future development plan



reviews will be important in ensuring that national and regional objectives for planning and investment can be further detailed at individual local authority level.

The officials of the Department are available to discuss the matters raised above in further detail as necessary to assist the Assembly in the statutory RSES process.

Yours sincerely,

Maria Graham

Maria Graham,
Assistant Secretary
Planning Division