Director’s Report

On

DRAFT REGIONAL SPATIAL AND ECONOMIC STRATEGY
for the Northern and Western Regional Assembly

Prepared in relation to submissions received pursuant to S. 24 (1) of the Planning and Development Act, 2000 (as amended)

April 2019
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Introduction

Purpose, format and contents of the Director’s report

The purpose of this Director’s Report is to provide an account of submissions/observations that have been received as part of the consultation process on the Draft Regional Spatial and Economic Strategy (RSES). The consultation process commenced on 19th November 2019 and closed on 8th February 2019 with 1055 submissions/observations, with almost 880 of them relating to a single issue - the Western Rail Corridor.

This Report forms part of the statutory procedure for the preparation of the RSES and is prepared in accordance with the requirements of Section 24(8) of the Planning and Development Act, 2000, as amended, thus enabling consideration of submissions/observations in deciding to make the Regional Spatial and Economic Strategy.

The purpose of this Director’s Report is to provide an account of submissions/observations that have been received as part of the consultation process on the Draft Regional Spatial and Economic Strategy (RSES).

The Report is structured in a similar manner to the published Draft RSES and so is formatted in the chapters of the Strategy as follows:

1.0. Setting the Context:

2.0. Strategic Analysis & Vision

3.0. People & Places
   (includes MASP for Galway and 3 Regional centres)

4.0. Growth Ambition 1: Economy & Employment – Vibrant Region.

5.0. Growth Ambition 2: Environment - Natural Heritage.

6.0. Growth Ambition 3: Connectivity – Connected Region.
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7.0. Growth Ambition 4: Quality of Life.

8.0. Growth Ambition 5: Infrastructure – Enabling Our Region

9.0. All Island Cohesion:

10.0. Implementation 13. Appendices

This report has also considered submissions relating to Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Regional Flood Risk Assessment (RFRA) as part of the account of submissions received.
Section 1 – Setting the Context and
Section 2 – Strategic Analysis and Vision

Submissions Received: 2019012, 2019013, 2019084, 2019025, 2019020, 2019026, 2019031, 2019042, 2019044, 2019048, 2019049, 2019052, 2019067, 2019068, 2019069, 2019077, 2019078, 2019089, 2019099, 2019116, 2019146, 2019122, 2019125, 2019003, 2019045, 2019052, 2019080, 2019002, 2019085, 2019140, 2019051, 2019141

High Level Summary of Issues

Many submissions have been received that are in support of the RSES and the vision set within Sections 1 and 2 but a number have raised some concern with various provisions across the plan and its length, others have suggested some amendments that would help to clarify it but many are complementary of the document.

It is suggested in submissions to section 1 and 2 that they could be made more concise, whilst continuing to highlight the challenges, Risks and mitigation required. It is stated that risks and challenges include Brexit, which will alter the legal, administrative and political basis for cross-border cooperation and exercise pressure for increasing divergence between the regulatory frameworks on the two sides of the border. It is suggested that it requires more specific and renewed attention to developing new collaborative approaches to cross-border policy-making and effective cooperation. It is suggested that there is a particular need to understand and boost the capacity of organisations (government, third sector and business) at every level – national, regional and local – to work effectively in a changing environment and this should be reflected early in the document.

The evidence base is broadly welcomed and it is suggested that it would be helpful to include more of the main metrics from the Socio-Econ. Baseline Report. In making the document more concise it is considered that it should identify critical issues across the growth ambitions, and give reasons for policy interventions, and what is the projected scenario as the end result. It is also suggested that the document rightly highlights the importance of developing a pipeline of talent and that this chapter should also highlight this.

It is concurred that placemaking is central to the vision for the region and this also should be highlighted in these chapters. It is stated that the RSES must deliver adequate supply of commercial and residential property, supporting FDI, and indigenous enterprise, Life Long learning & education which are key to success. Implementing the RSES is crucial, mechanisms must be clear, and the RSES should ensure that investments through LA’s or other means should be reviewed regularly.

The region needs to receive positive discrimination to address its decline, as evidenced by our region moving from a more developed region to a ‘transition region’. This needs to be highlighted and we need to bring balanced regional development. The submissions welcome the ‘Growth Framework’, which builds the region’s strategy around the central ambitions and gives a focus and coherence to a broad and complex range of policy areas. It is also suggested that there needs to be more clarity as
to how it is envisaged the Growth Ambitions shall be operationalised and to clarify how the themes relate to the ambitions.

**Director’s Response**

These chapters sought to bring focus and coherence to a broad and complex range of issues and it is welcome that this is understood and acknowledged. However, it is also acknowledged that the RSES would benefit from a more focused approach. The draft itself is the first time that Regional Spatial and Economic strategies have been attempted and therefore it was considered appropriate to give a more detailed account within these sections at the consultation stage than is required within the final document. It is considered that the adopted document would benefit from a review of chapters 1 and 2 to make them more concise.

**Director’s Recommendation**

1. Make a non-material change to sections 1 and 2 by reduction in the content to make it more concise but the content under the heading Integrating Environmental Considerations into the planning system and the overarching environmental objectives shall remain.

**Chapter 3 People and Places**

**Submissions Received:**

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**Section 3.1 Our Region & Section 3.2 Region in Focus**

**High Level Summary of Issues**

None

**Director’s Recommendation**

Make Non-material change to text to shorten the length of document.

**Section 3.3 Placemaking**

**Submissions received:** 2019134, 2019067, 2019134, 2019093, 2019140, 2019066, 2019137, 2019134

**High Level Summary of Issues**
The commitment to placemaking and quality of life within the draft RSES is strongly supported, as it brings together the roles of planning, design and management of spaces. This highlights the need for high quality connectivity between these places. The sequencing and delivery of social and physical infrastructure to support more sustainable, compact development is considered key to facilitating sustainable growth in the region’s urban centres and it is suggested that ‘place-making’ objectives should be delivered in the immediate and medium-term.

It is suggested that RPO 4 should be amended to include reference to environmental sustainability and that RPO6 should require flooding to be taken into account. It is noted in respect of RPO7 that reference is made specifically to the agri-food sector and that there is employment in sectors beyond the agri-food sector. It is also noted that RPO8 makes specific reference to the inclusion of the social, linguistic and cultural dimensions of the living experience of the Gaeltacht community and that it is important that the NWRA supports all communities. It is also suggested that RPO8 should be expanded to reflect a great place to live, age well and develop.

**Director’s Response**

The strong endorsement of ‘placemaking’ as a key pillar of the RSES is welcome and the suggestion that the timeline for its delivery to be immediate and medium term will be incorporated into an implementation matrix that shall be developed within the implementation chapter but in addition it is considered that its implementation should be ongoing for the lifetime of the RSES.

S2.4 makes it clear that all investment and feasibility studies should include appropriate environmental assessment (ie. SEA, AA & SFRA) and that as detail is developed down through the planning hierarchy, further opportunity for focussed assessment will be required to inform decision making at a level of greater granularity. Accordingly, the inclusion of reference to ‘environmental sustainability’ and ‘flood risk assessment’ at a specific RPO level as suggested would be overly repetitive, would not add value to the strategy, and is a cross-cutting issue for many other RPOs. The observations made in respect of RPOs 7 & 8 are noted and it is considered appropriate to modify their wording to be more inclusive – the suggestion to expand the wording of RPO8 to reflect a great place to live, age well and develop is appropriately encapsulated within the existing wording ‘quality of life’.

**Director’s Recommendation**

1. Not to amend the RPO4.
2. To make a non-material amendment to RPO 7
   
   From: Co-location or dynamic clustering. For example, in the agri-food sector, enterprises will seek to locate close to local suppliers of produce. Enabling connectivity and linkages within and between suppliers and purchasers, between enterprises and Higher Education Institutes (HEIs) is an important consideration for the RSES; and

   To: Co-location or dynamic clustering, enabling connectivity and linkages within and between suppliers and purchasers, between enterprises and Higher Education Institutes (HEIs); and

3. To make a non-material amendment to RPO8
   
   From: Development of quality of life factors and sense of Place, including harnessing the social, linguistic and cultural dimensions of the living experience of the Gaeltacht community.
To
Development of quality of life factors and sense of Place, including harnessing the social and cultural dimensions of the living experience of communities, including the unique social, linguistic and cultural dimensions of our Gaeltacht communities.

4. Make non-material changes to shorten the length of text within the section.

Section 3.4 – Urban Places of Regional Scale

Submissions Received: 2019007, 2019134, 2019112, 2019134, 2019066, 2019107, 2019122, 2019134

High Level Summary of Issues

The Minister for Housing, Planning and Local Government acknowledge that the RSES propose One MASP, Three Regional Growth Centres and eight Key Towns. It is stated that this is considered to be 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. It is suggested that the table showing this be clearly titled and numbered. The submission further advises that the regeneration of important regional towns that have derelict and underutilised sites will be best achieved where the sequential test is applied and the focus is firmly placed on actively developing such sites within town cores.

The NTA and TII highlight that in order to ensure that the development of larger urban settlements is delivered in a coordinated and sustainable manner, particularly in relation to transport opportunities, it is important that the location and scale of new development is informed by the potential accessibility and connectivity of these locations. The integration of land-use and transport planning is advocated through the preparation and integration of complementary Local Transport Plans and the accompanying Area Based Transport Assessment (ABTA). It recommends that an additional RPO be inserted in s3.4 providing for same.

Submissions ask that population targets and population projection, as per Circular Letter 04/2018 FPS, should not be seen as limiting in terms of growth.

Mayo County Council say that Westport should be designated as a Key Town and further say that the RSES should designate Castlebar and Westport as a linked hub that, in terms of population and scale, would form the basis of a critical mass similar to that of Sligo and Letterkenny. It is stated that there is a justifiable case given the proximity between Castlebar (pop. 12,068 CSO 2016) and Westport (pop. 6,198, CSO 2016), the established strong economic and commercial links and inter-dependencies between the two towns (including rail connectivity). Mayo County Council believes that the effective functioning of the dual capacity of Westport and Castlebar, (combined population 18,266) will be further enabled on completion of the Westport - Castlebar N5 dual-carriageway, the construction of which will commence in 2019 and will have a commuting time of approximately 10 minutes. It believes that this will strengthen the urban structure of the region, providing a strong urban centre of scale between Galway Metropolitan City and Sligo Regional Growth Centre, further consolidating the AEC as an effective counterbalance to Dublin in this region. It is stated that the Hub, with a scale equal to Sligo, will also lay the foundations for the true integration of the second largest county in the region within the Atlantic Economic Corridor.
**Director’s Response**

The acknowledgement of the appropriateness of the settlement strategy by the Minister for Housing, Planning and Local Government and the suggestion by the NTA to enhance the integration of land-use and transport planning through the inclusion of an additional RPO is welcomed. The population targets set out throughout the RSES are minimum targets that have been proposed through the RSES, however the population projections provided for each county has been provided by way of Circular Letter by the DHPLG and are simply reproduced within the RSES.

In response to the proposal to identify Westport as a Key town and to link it with Castlebar as a Hub, I would advise that the Draft RSES has identified a settlement hierarchy that implements and amplifies the provisions of the National Planning Framework. It reaffirms the role of Galway as a Metropolitan Area and Sligo, Letterkenny and Athlone as the key Regional Growth Centres. The Draft RSES also identifies eight Key Towns, that are geographically dispersed across the region, and include the two Mayo towns of Castlebar and Ballina. Additionally, the Mayo town of Westport is identified as a location of strategic development potential within the RSES. The development of this settlement strategy has been informed by a number of key considerations further to NPO7 of the NPF and the need to provide for a limited 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. The identification of Ballina and Castlebar as Key Towns is supported by the identification of Westport as a location of strategic development potential in proximity to Castlebar. This presents Mayo with the opportunity to grow the functions of these settlements independently or collaboratively and all of which could accommodate greater population as well as further jobs growth.

**Director’s Recommendation**

1. Make non-material amendment by inserting a New RPO as follows: Prepare Local Transport Plans (LTPs) for each of the 12 identified Urban Centres (including Athlone), in collaboration with the National Transport Authority, and other statutory bodies as deemed necessary.

2. Make non-material amendments by reiterating objective to deliver regeneration as referenced elsewhere, within s3.6 and 3.7, and amalgamate it with RPOs 9 & 10 so as to provide a single RPO and to renumber RPOs accordingly.

   **From:**
   
   RPO9. Deliver on the population targets for the Metropolitan and Regional Growth Centres through compact growth.

   RPO10. To deliver significant compact growth in Key Towns

   **To:** Develop urban places of regional scale through:

   I. Delivering on the population targets for the Metropolitan and Regional Growth Centres through compact growth:

   II. Delivering significant compact growth in Key Towns; and

   III. Developing derelict and underutilised sites, with initial focus within town cores.
Section 3.5 Smaller Towns, Villages and Rural Areas

Submissions Received: 2019147, 2019020, 2019026, 2019052, 2019067, 2019080, 2019009, 2019146, 2019085, 2019140, 2019099, 2019137, 2019031

High Level Summary of Issues

Submissions accept that the weak urban structure in the Region is a challenge that needs to be addressed and that this means difficult decisions have to be made to enable regional centres of scale to develop whilst retaining the vitality and viability of smaller towns, villages and rural areas.

Submissions concur with the Draft RSES that the enhancement of the vibrancy and vitality of rural areas is a key issue and the ask of the RSES is to provide a framework for action. A submission suggests that with an ageing population nationally, there is a growing international recognition of the need to plan for shrinkage and that the RSES needs to grasp this ‘nettle’. It is also suggested that the RSES needs to provide guidance on rural housing and to put objectives in place that controls urban generated rural housing, directing rural housing into the smaller towns and villages. However, others say that they are not satisfied with the provision of the Draft RSES that advocates the methodology of the NPF in distinguishing between Rural Areas / Rural Area’s under strong rural influence. Submissions also ask that the RSES provide detail on the potential spatial distribution of population and employment growth allocations for rural towns and villages below the Key Towns. It is further suggested that the RSES should highlight the importance of other settlements below the ‘Key Towns’ that play an important part within the economic function of rural areas and to insert an RPO that requires these to be identified in the Development plan process.

A submission has been received suggesting that the role of rural area’s be clearly defined in the RSES and suggest that the key roles of rural areas could be summarised as follows:

- Areas with a clear distinction from urban areas in their character.
- Areas of rural population, rural employment and rural social character.
- Areas of recreation and tourism based on their resources and assets.
- Areas of high environmental quality.
- Areas of agriculture.
- Areas that protect against climate change and areas that can adapt to climate change.
- Working areas that can accommodate renewable energy production.
- Areas of water resources.

It is noted that a submission asks that a ‘rural area’ be defined as those places with a population of less than 10,000 as they perceive its definition to be within the NPF and not 1,500 as defined in the RSES.

Many submissions welcome the focus on the regeneration of settlements, with an emphasis on creating ‘liveable’ places, with a qualified welcome for the serviced sites initiative but there is some concern regarding deliverability and whether there would be funding available. Others seek to ensure that the principle is not confined to smaller towns, villages and rural areas and some seek clarification on timelines. A suggestion is made that the timeline of RPO18 be extended and it is suggested that a rolling two-year review and implementation plan be subsequently prepared by local authorities. It is suggested that there may be benefit in providing some case studies of best practice and examples of successful town and village renewal fund applications.
There is broad support given for RPO14, which seeks to deliver at least 20% of all new housing in rural areas on brownfield sites but some note that this may be difficult to achieve in some rural counties and it is suggested that the wording be amended to amended ‘to strive towards 20%’. should promote the restoration of old houses or sites which have been previously used and are already serviced.

It is also suggested that the RPO22, which addresses the implementation of CFRAMs, should be a priority as it is necessary to support a variety of public and private investments.

**Director’s Response**

It is welcome that there is broad support for the recognition that the RSES gives to vibrancy and vitality as a key issue. It is correct for submissions to say that we need to manage not just growth but also shrinkage and the RSES does address both. The draft RSES provides a framework for managing this change at an appropriate level but the development of rural housing guidelines is more appropriately dealt with by way of Ministerial Guidelines under section 28 of the Planning Act. The RSES has simply reiterated the provisions of the National Planning Framework whereby it states that... ‘it is important to differentiate, on the one hand, between rural areas located within the commuter catchment of the five cities and our largest towns and centres of employment and, on the other hand, rural areas located outside these catchments.’ The NPF defines centres of employment as large towns and employment centres as towns with a population of more than 10,000 people or more than 2,500 jobs. (This equates to Galway, the three Regional Growth Centres and the Key Towns within the N&W region). The methodology for defining catchments is also defined in the NPF as based on 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 commuting catchment, or functional area. It is considered that the management of rural housing is most appropriately dealt with at a local level and the RSES makes this clear, whilst identifying a range of material considerations that should be taken.

The suggestion that the RSES provide population and employment growth allocations for rural towns and villages below the Key Towns is considered to be more appropriately the function for the relevant local authorities to determine and identify and therefore is not included in the RSES. The suggestion that the RSES should highlight the importance of other settlements below the ‘Key Towns’ that play an important part within the economic function of rural areas and to insert an RPO that requires these to be identified in the Development plan process does have merit and reflects current practice.

The suggestion that the RSES identify the role of rural areas would have the benefit of bringing greater understanding to the important role that rural areas play within the region and should be incorporated into the supporting text. The suggested that the RSES includes a definition of rural areas as those areas outside settlements with a population of 1,500 or more housing and that rural areas should be defined as those settlements with populations of less than 10,000 as referenced in the NPF is not accurate. The RSES does not provide a definition of rural areas and I would further advise that it was not included as it is already defined within the NPF. The NPF has referenced the CSO definition of rural as those areas outside settlements with a population of 1,500 or more people but elsewhere in the NPF it also states that ‘there are many towns and villages with populations of more than 1,500 people that are intrinsic to sustaining viable rural communities and do not function independent of their rural hinterland. In planning for the future integrated growth and development of rural areas, settlements with a population of 10,000 people or fewer, may be eligible for investment under either the Rural or Urban Regeneration and Development Fund, subject to the
nature of the proposal.’ It is considered that the RSES does not overly benefit from including a
definition of rural as this has already been incorporated into its parent statement (ie. NPF).

Within the context of regenerating and reimagining our rural towns and villages there is some
concern about the deliverability of serviced sites and the availability of funding of same. The RSES
does not have a specific funding stream but the benefit of this approach in principle has been
embraced and should be retained, subject to the suggested amendment to RPO18 to incorporate a
review.

The suggestion that there may be benefit in providing some case studies of best practice and
examples of successful town and village renewal fund applications is honourable. However, it is also
acknowledged that the document in its draft format is too lengthy and thus the incorporation
additional text is not recommended.

It is acknowledged that there is some concern that the requirement to deliver at least 20% of all new
housing in rural areas on brownfield sites may be difficult to achieve but nonetheless this is on
balance something that can promote the restoration of old houses or sites which have been
previously used and are already serviced have benefits to the sustainability of rural areas and
therefore should be retained unchanged.

The suggestion that the RPO22, which addresses the implementation of CFRAMs, should be a
priority as it is necessary to support a variety of public and private investments is endorsed and shall
be reflected within the Implementation Chapter.

**Director’s Recommendation**

1 Make a non-material amendment to the text in s3.5 that states that the key role of rural
area’s can generally be summarised as follows:
   • Areas with a clear distinction from urban areas in their character.
   • Areas of rural population, rural employment and rural social character.
   • Areas of recreation and tourism based on their resources and assets.
   • Areas of high environmental quality.
   • Areas of agriculture and natural resource development.
   • Areas that protect against climate change and areas that can adapt to climate change.
   • Working areas that can accommodate renewable energy production.
   • Areas of water resources.

2 To make a non-material amendment to the text in s3.5 that states that there are many
smaller settlements with a population below that of Key Towns, within each county, which
play an important role in supporting the social, economic and cultural communities of rural
areas.

3 To make a non-material amendment by inserting a new RPO
   New RPO: To support the role of smaller and medium sized towns, which demonstrate an
   important role in terms of service provision and employment for their catchments within the
   economic function of the county. Such settlements will be identified through the
   Development Plan process as part of the Settlement Hierarchy and the Core Strategy.

4 Make a non-material amendment to the wording of RPO18
   From:
Local authorities to identify and prioritise a program for the provision of serviced sites within smaller towns and villages within 1 year of the adoption of the NPF. A rolling two year implementation plan shall subsequently be prepared by local authorities.

To:
Local authorities to identify and prioritise a program for the provision of serviced sites within smaller towns and villages within 1 year of the adoption of the NPF. A rolling two year implementation and review shall subsequently be prepared by local authorities.

5. Make a non-material amendment through the referencing of RPO22, as a priority action within the Implementation Chapter.

Section 3.6 – Delivery of Compact Growth

Submissions Received: 2019049, 2019067

High Level Summary Of Issues
There are concerns at the different approaches to our large urban areas and a desire to have consistency in their treatment. Galway and Sligo are generally held as exemplars of how the RSES should look. The inclusion of objectives as part of the large urban settlement is recommended. There is a welcome for the template used for our Key Towns.

Director’s Response
The most common theme in the submissions received in this section was consistency in approach to the development of designated urban areas. Galway and Sligo were commended as being good examples of the Assembly's general approach. Athlone was regularly identified as different to Galway and Sligo, this situation was asked to be remedied through further elaboration and prominence for Athlone as a regional centre. Letterkenny is recognised as different through its close association with Derry, nevertheless, the balance of submissions favours a similar approach to Letterkenny as our other regional centres.

There is one dissenting view to the above from EMRA who ask that their approach to Regional Centres in Athlone, Dundalk and Drogheda be followed and that our approach 'is incorrect'. The request to include the population figures in the Roadmap is noted, the Roadmap deals with Regional, MASP and County population figures and a link to it can be provided at an appropriate location.

There is a statutory requirement for Core Strategies to be consistent with regional development objectives and this does not need to be repeated in an objective. Consideration to changing our Regional Planning Objectives (RPOs) to Regional Development Objectives (RDOs) in the interests of consistency with terminology in the Planning Act will be made.

The Director also notes the discussions which took place at the SPA meetings held in March, where members expressed the views that all regional centres should be treated consistently using the approach to Sligo as a template.
**Director’s Recommendations**
1. That the RSES has a consistent approach to Regional Centres and that the Draft be amended to reflect this.
2. The Draft RSES be amended to include a link to population figures recorded in the Implementation Roadmap for the NPF.
3. Make non-material change in relocating the Galway Metropolitan Strategic Plan (MASP) to a separate standalone section of it’s own (Regional Centre Strategic Plans for Letterkenny, Sligo and Athlone to be retained within their own section, with the Key Towns and other locations).

**Section 3.6A – Galway Metropolitan Area Strategic Plan**

**Submission Received:** 2019013, 2019084, 2019087, 2019033, 2019045, 2019020, 2019026, 2019042, 2019049, 2019002, 2019116, 2019090, 2019143, 2019066, 2019089, 2019122, 2019137, 2019128, 2019080

**High Level Summary of Issues**
There are calls for the expansion of the MASP to include Athenry, Moycullen and Spiddal, for the extent of the MASP to be similar to that of other cities e.g. Limerick. There is general support for the infrastructure projects that are in the Draft pertaining to the city and to have them as part of the MASP. A weakness identified is the paucity of the implementation/monitoring/delivery of the plan. There is some discussion on the potential of the Airport site to contribute to development of the MASP.

There is support for the concept of compact growth and the identification of areas where this should first occur. The sequencing of infrastructure delivery is key to successful delivery of this plan

**Director’s Response**
At a global level there are equal numbers of submissions commending and criticising the approach taken in preparing the MASP.

The greatest number of submissions were received in relation to provision of infrastructure. These in particular are not necessarily referenced in the MASP as RPOs but all projects are already included in the various sections on infrastructure. There may be an advantage to including projects specific to Galway in the MASP section.

The next most common submissions are calls for the extension of the MASP to include Athenry, Moycullen and Spiddal. This is related to the queries on the rationale for the extent of the MASP and concerns with the size of the MASP, when compared with Limerick for example. By way of explanation the extent of the MASP was informed by criteria set out in S10.2 of the NPF and included the functional urban area of Galway, commuting patterns, environmental considerations, work carried out by the NTA in preparing transport strategies, future development proposals, infrastructure provision and compact growth. In comparison with other MASPs, Galway performs very well when population density is used as a comparator with only Dublin having a higher density.
The fact that Limerick MASP is 2½ times larger than Galway is a compliment to the relatively compact nature of Galway City’s development.

The proposal to extend the MASP area was examined, the Moycullen DED has a common boundary with the proposed MASP and 56% of workforce commutes to the city. Athenry DED is discrete from the city and the recorded commuting rate is 41%. The Draft MASP area already includes DEDs with commuting rates in the 50’s to the East, (the majority are in the 60’s and 70’s). This information above was presented to the Western SPA Meeting in March. Spiddal has similar characteristics to Athenry in terms of commuting and separation. There is more merit including Moycullen in the MASP than Athenry or Spiddal, based on the criteria that informed the extent of the Draft MASP.

There are a number of submissions on the potential/future uses of the Airport site. There is scope to have many uses and development on what are well connected serviced lands within the MASP. The ownership of the lands present an ideal opportunity for the production of an Urban Framework Plan for the lands would be an appropriate planning response to how this area might develop in the lifetime of the RSES.

The concept of compact growth is a consistent theme across the NPF and all Draft RSES. There is recent statutory guidance on Building Heights and Apartment sizes with consequent impacts on residential and other densities. In a city like Galway with its medieval areas, its architectural conservation areas and protected structures it would be important that a strategy for building heights for the city would inform its future development.

**Director’s Recommendation**

1. Make a non-material change by providing revised and additional text setting out the positive attributes of Galway reflecting its status as the only Metropolitan City within the region. This to set out the geographical reach of Galway at a regional and national level, drawing upon its function as a Metropolitan City of scale which, together with Limerick/Shannon, Cork and Waterford shall have a combined potential as viable alternatives to Dublin. Acknowledge that the Galway Metropolitan Area shall be prioritised for focused and long-term investment as the region’s most significant economic engine to ensure regional parity (together with Limerick/Shannon, Cork and Waterford) and that they achieve accelerated growth by comparison with Dublin.

2. Make material amendment by inserting a New Objective as follows:
   It is an objective to establish a collaborative approach to enable the Galway Metropolitan Area and those Metropolitan Areas of Cork, Limerick/Shannon, and Waterford to lead in partnership with each other to harness their combined potential as viable alternatives to Dublin.

3. Include a schedule in the MASP section outlining the projects and policies directly related to the area which are supported in the RSES together with a prioritisation timeframe.

4. Include Moycullen and the area south of it as part of the MASP, refer to attached map for the delineation and scope.

5. Include an objective in the RSES to prepare an Urban Framework Plan for the Airport site and its immediate hinterland

6. Include an objective require the preparation of a Building Heights Study, a strategy to guide future sustainable development taking into account the historic, culture and infrastructure features in the city.
7. Proposed RPOs:

1. Support the delivery of the infrastructure projects outlined below in order to develop the MASP as outlined in the strategy.
   A. Galway City Ring Road
   B. Galway East main Drainage Wastewater Treatment Plan
   C. Galway Transport Strategy
   D. Galway Drainage Area Plan
   E. Galway City Water Supply Scheme
   F. Galway City Main Rehabilitation Contract.

2. Support the regeneration and development of the city centre sites at Galway Harbour, Ceannt Station and Headford Road.

3. 50% of new homes for the population target shall be constructed within the existing City Development Envelope, 40% of these shall be constructed on infill and/or brownfield sites.

4. Support the provision of a dual railway track between Galway and Athlone.

5. Support the delivery of lands for employment uses at Knocknacurra/Rahoon, Mervue, Dangan, Parkmore, Briarhill, Airport and Oranmore.

6. Support the provision of Childcare, Education and Health Services within the same timeframes as the residential and employment uses outlined above

7. The Assembly supports the delivery of an Urban Framework Plan for the Airport Site for residential, community and employment use.

8. The Assembly supports the retention of existing agricultural land within the MASP and only in exceptional circumstances would it support the development of new residential or commercial uses on un-serviced green field sites.

9. The Assembly supports the designation of a technological University in the Region which will be partially located in Galway; in order to complement existing 3rd level educational facilities and to foster the innovative knowledge-based economy of the region.

10. It is an objective of the Assembly to support the delivery of a modern hospital at Merlin Park that will serve the city and the region.

11. The Assembly supports the delivery of a strategic Greenway Network for the GTS to include National Dublin to Galway Cycleway, Oranmore to Bearch Coastal Greenway and the Galway to Clifden Greenway.

12. The Assembly supports the preparation of a Building Heights Study, a strategy to guide future sustainable development which takes into account the historic culture and infrastructure features of the city. In developing this strategy, areas of high density will target minimum rates for residential of 50 units/ha. The default rate for other areas will generally be 35 units/ha.
Section 3.6 (b) Letterkenny Regional Growth Centre Plan (North West City Region)

Submissions Received: 2019120, 2019121, 2019068

High Level Summary of Issues

Comments on the Letterkenny Plan were generally supportive of the Draft, however in line with general commentary on the Regional Centre’s of Sligo, Athlone, and Letterkenny, there were a number of submissions which encouraged more consistency, and a similar balance to the approach taken for all 3 centres. Several submission also suggested that the Letterkenny element of the RGCP should be effectively dealt with singularly, and the cross border element (i.e. NWCR) should be an integral part of the Cross Border piece in the RSES (All Island Cohesion, Chapter 9).

Concern that the designation of Letterkenny as a Regional Centre is not receiving parity with the other designated Regional Centres of Sligo and Athlone. It recognises that it is being considered appropriately in relation to the cross-border North West Gateway Initiative network. But this should not be at the expense of its own role as a Regional Centre.

In relation to population & growth rates, Donegal County Council suggest a Minimum growth rate of 50% should apply in lieu of 40%

A submission on behalf of Magim Ltd was received in respect of 30ha. of land in the Carnamuggagh area of Letterkenny, and it is currently zoned Strat. Residential Reserve and Local Environment in the Donegal CDP 2018 – 2024.

Magim Ltd. Are engaged with the Local Authority on the Letterkenny Local Area Plan pre Draft consultation, and they have requested the lands be redesignated as Carnamuggagh Hub, and this should form part of a larger masterplan for the area NorthWest of Letterkenny Town Centre to create a neighbourhood and involves LYIT & the IDA.

- General Comments:
  
  I. Maps should not be included if they prejudice future LAP.
  II. Population Projections: The Draft RSES projections do not match with the CDDP projections for Letterkenny. Question whether the figure of growth for Letterkenny (40% is the correct approach).
  III. The RSES should review the potential for applying 40% of the overall County Donegal population growth (as projected) to Letterkenny.

- Enterprise Ireland is listed in connection with two potential projects, where their role is somewhat unclear. As part of Enterprise Ireland’s Regional Implementation Plans, it has a role in assisting Local Authorities develop appropriate Enterprise spaces/zones within cities and urban drivers (Letterkenny included). Enterprise Ireland are encouraging local authorities to provide for high quality enterprise space which could include Incubation space and co-working. With regard to a proposed LYIT campus extension Enterprise Ireland does have a fund for such campus-based projects at present and clarity on their potential role would be required.

- Detailed queries are raised across this Strategic Plan in respect of greater clarity as to how boundaries were defined and implications. Queries are raised in respect of incorrect references to tables and figures and reference to education qualifications seems to have an
error, reference is made to Level 3 or above, but on the NFQ qualification system Level 3 is the Junior Certificate.

Donegal County Council’s submission outlines their sought after Key Outcomes arising from the Draft, and they are summarised below:

That the Ten-T projects for Donegal are priority in the RSES.
The RSES should outline a potential growth in population for the Regional Centre’s of 50% in lieu of the 40% outlined in the Draft.
The RSES should identify the NWCR, and the Regional Centre as having investment priorities.
Letterkenny is one of a select number of Regional Growth Centres in the region and this is sometimes unclear within the Draft.
A greater recognition of the Atlantic Economic Corridor, and the fact that Letterkenny / Derry anchors the Northern end of this Corridor. Growth of Letterkenny and its strategic role is recognised in the doc. (Specific suggestions on the Letterkenny RGCP include:

1. Population of up to 35,000,
2. Urban Design and Regeneration Masterplan,
3. a new Southern Residential neighbourhood,
4. Town Centre Enterprise Quarter,
5. and an Urban Greenway Network.
6. The expansion of LYIT Campus.
7. Regional Transportation Hub,
8. Southern Relief Road & n-56 Link road across the River Swilly @ Bonagee.
9. Identification of Letterkenny Cluster, which includes Optum, Zeus, SITA, Optibelt, Kirchoff, Medisize (ICT Services).

Director’s Response

The submissions are noted, and the key outcomes sought be DCC are generally reflected in the re-written Regional Growth Centre Plan for Letterkenny, which includes the priorities for the Town, the wider infrastructure needs for the Donegal Region.

In respect of the specific request around the lands at Carnamuggagh, whilst the RGCP does outline a vision for the next 20 years for Letterkenny, it is not appropriate to enter into specific future uses of sites, or landbanks, and this is something which is more likely to be done via the forthcoming Letterkenny & Environs Local Area Plan, which is being prepared at present by DCC.

Director’s Recommendation

1. Make a material change by replacing section 3.6B with a new Letterkenny Regional growth Centre Strategic Plan (RGCP), as set out separately in Appendix 1 of this document. It shall be specific to Letterkenny as a Regional Growth Centre, and shall be contained within a specific section that is dedicated to the Regional Growth Centres and the Key Towns. It should be noted that the structure of this Letterkenny RGCP is along similar lines to the structure set out for Sligo & Athlone albeit bespoke to Letterkenny. The key Objectives include:

I. RGCO 1: To grow Letterkenny to a Regional Centre of approximately 28,000 by 2040.
II. RGCO 2: To grow the number of jobs in Letterkenny to approximately 16,000 by 2040.
III. RGCO 3: To ensure that at least 40% of all newly developed lands (Residential, Enterprise & Employment) are within the existing built up envelope of Letterkenny & its environs.
IV. RGCO 4: To provide an additional 3,000 -4,000 residential units within Letterkenny to facilitate the growth as set out at No.1, above.

V. RGCO 5: To deliver the entire Ten-T network solution for Donegal & Letterkenny by 2028, including the N-56 Link, and the Southern Relief Road (Leck Road), the N-14 Manorcunningham – Lifford. & N-13 Letterkenny Bridgend.

VI. RGCO 6: To facilitate the expansion of the LYIT Campus.

VII. RGCO 7: To prepare (within 2 years of the adoption of the RSES), a Local Transport Plan (LTP) for Letterkenny, which will include a multi-modal focus, and Public Transport roadmap.

VIII. RGCO 8: To develop a dedicated & integrated cycle network around Letterkenny, including the creation of a Greenway along the line of the River Swilly to offer residents a viable alternative to car based journeys.

IX. RGCO 9: To deliver a multi-purpose Public & Private Regional Transport Hub within the Town Core of Letterkenny to serve County Donegal & the wider Region. RGCO 13: To carry out a feasibility study which investigates the potential & viability of a Rail Link between Letterkenny & Derry in future decades.

X. RGCO 10: To develop a Town Centre Living Scheme within 3 years of the adoption of the RSES, and to ensure the main findings of this Scheme are implemented by 2025.

XI. RGCO 11: To deliver a Masterplan, in Urban Regeneration & Linkages between the Main Street Area, and the New Retail Park within 4 years of the adoption of the RSES, ensuring this Masterplan is delivered and implemented by 2027.

XII. RGCO 12: To expand Letterkenny’s bed-night capacity, and overall Tourist Offer as a Destination Town serving the Northern Headlands of the WAW.

XIII. RGCO 13: To consolidate existing neighbourhoods (hereinunder listed) through a series of targeted measures. Town Centre, Glebe / Kiltoy, Lisnennan, Carnamuggagh, Glencar Scotch, Glencar Irish, Ballymacool & Oldtown.

Section 3.6 (c) Sligo Regional Growth Centre Plan

Submissions Received: 2019001, 2019030, 2019050, 2019070, 2019110, 2019150, 2019137

High Level Summary of Issues

Multiple submissions in relation to the Sligo RGCP were generally supportive of the framework which was set out in the RSES Draft, and these include Sligo Economic Forum, Sligo BID, Sligo County Council, Sligo IT, & Sligo Chamber of Commerce.

- The proposal for the redevelopment of Sligo docklands and Port areas including dredging activities do not acknowledge the Natura 2000 designation (Cummeen strand SPA and Cummeen strand and Drumcliff Bay SAC, Lough gill SAC) that extends into the harbour area.
- Sligo Economic Forum – Generally agree with approach adopted, and the Designation of Sligo, and the growth & population targets attached to the Draft, whilst ambitious, are reasonable.
- There is a need for a greater economic focus on Sligo Town through other sectors of the Draft, as advocated in the Sligo County Council submission.
- The Transport Strategy for Sligo RGCP should cover the entire hinterland, not just Sligo Town.
- Rail & Gas: Submission advocates as per the approach set out in Sligo County Council submission.
• Other area’s, including Water Supply & Cross Border co-operation, is suggesting identical recommendations to the Sligo County Council submission.

Jobs & Population Projections: 4,000 new jobs anticipated in Sligo up to 2020. 1,000 have already announced in 2018. Refurbishment of buildings in Sligo’s urban core is important in this regard, Sligo Chamber are active in this area. The indications are the uplift figures for Sligo Town (forecast to 2026) are likely to be realised in 2021, and the figures for 2021 & 2026 need to be doubled. The submissions emphasises the uplift figures should not be viewed as a cap. 11,000 potential new homes by 2040, with Sligo Town population potentially increasing to 40,000 over the next 20 years.

Collooney - Collooney is the most important of the satellite towns to Sligo, it has 2 industrial parks, and large population, and should be included in the SRGCP Boundary, the N4 upgrade further strengthens the positions of Collooney, and there is potential in a number of area’s including Rail. The village of Ballygawley is adjacent to Collooney, and therefore should also be included in the Sligo RGCP Boundary.

Sligo should be a central plank of the AEC, and should grow faster than most other centre’s along the corridor in the coming years. The AEC follows the European polycentric model of growing a number of well connected centre’s within the Region. The upgrade of the N15 from Sligo to Bundoran is key to same, and is supported, though it is not on any current list (Tii). Objectives in relation to the WRC are also supported. (Refers: 115 & 118 RPO).

For Regional Growth to thrive in the West, and meaningfully counter balance the East of the country, Centre’s like Sligo must be allowed to grow, and the targets of the Draft RSES should be revised accordingly. Further recommendations: Support the Designation of the TEN-T Core from Galway to Sligo to Letterkenny. Support the roll out of the Gas Network in Sligo Town itself, via a specific Objective.

Sligo Regional Growth Centre Plan (2019110) a submission was received on behalf of a Construction firm (Burke’s) who have a significant landbank of 73ha. South of Sligo Town, which has potential to deliver significant residential potential. Lands are at Caltragh, Cornageeha & Carraroe. These landbanks are broken into 5 area’s, 3 of which are within 1.3km of Sligo Town Centre, and 2 sites are urban fill, adjacent to established residential areas. Lands identified as Strategic Reserve in current Sligo Local Area Plan, and it is now imperative that the lands are recognized in the Sligo RGCP as strategic, to enable their development. The provision on the Western Distributor Road will further enable additional residential supply, but Burke’s Ltd. Do not wish to see any time lag in the move towards full implementation of the RSES, policy direction for Sligo should be specific to allow prompt delivery of housing. Caltragh: Identified in Sligo RGCP as being capable of housing 11,000 additional population, therefore lands at Caltragh identified should be released from SLR.

The requirements for, or implementation of, local public transport services, walking and cycling priorities are not identified but these issues can be adequately addressed through the LTP mechanism. Accordingly it is recommended that specific reference is made to the need for a Local Transport Plan (LTP) for Sligo Town and Environs, and note that this will set out the investment and implementation priorities for transport within the Strategic Plan area..

Sligo, as a Regional Growth Centre, will be a third level service centre, providing key health, education, recreation, transport and enterprise services to the Region. It is important that this is made explicit so that decisions made at national level on the provision of services and service centres align with this.
Director’s Response

There are 3 general issues of concern in relation to Sligo were:

(i) population projections, and the concern held via a number of submissions that a growth rate of 40% extra (on top of the existing population) to 2040 was not adequate in terms of ambition.

(ii) That Collooney should be included in the Sligo RGCP Boundary, for a number of reasons, including its strategic location and industrial base, as well as capacity (enterprise lands)

(iii) Sligo should be a centrepoint along the Atlantic Economic Corridor, and there should be specific reference to road upgrades along this Corridor (e.g. N17 & N15).

The population projections / targets are not limits, and have been applied in a measured manner throughout the urban hierarchy of the RSES, as set out in Section 3, People & Places. With the Metropolitan Centre of Galway being allocated an approximate growth figure of 50%, and the Regional Centre’s of Athlone, Sligo & Letterkenny having a 40% growth rate applied, and the key towns below this having a growth target of 30%. To allocate a higher growth target for Sligo Town would result in the remainder of Sligo County, and its medium size centre’s of Ballymote, Tubercurry etc. losing proportionately as a result.

The main Infrastructural priorities for the entire region, and indeed Sligo are identified clearly in the Sligo RGCP, and an estimated time-frame for delivery of same is also included.

The inclusion of Collooney in the RGCP boundary was examined in detail, however, when the population of Collooney was factored into the overall population of the RGCP Area, against the PUA population, it resulted in the overall Population within the Principal Urban Area falling below the recommended threshold as set down by the DHPLG in their guidance, as per the NPF Roadmap (2018).

Director’s Recommendation

1. Make non-material amendment by positioning the Sligo Regional Growth Centre Strategic Plan There are no material changes recommended to the Sligo Regional Growth Centre Plan within a specific section that is dedicated to the Regional Growth Centres and the Key Towns.

2. Make non material change to the structure of the Document to ensure it has similar alignment to the structure set out for Letterkenny and Athlone albeit bespoke to Sligo. Said amendments to include highlighting the key objectives including:

   I. Sligo RGC-O-1 Support population growth in the principal urban area of Sligo to a level of approximately 28,000 persons by 2040.

   II. Sligo RGC-O-2 Facilitate the provision of 3,000 to 5,000 residential units within Sligo Town, in order to accommodate the additional population envisaged by 2040. [ ]

   III. Sligo RGC-O-3 Ensure that at least 40% of new residential and employment-related development in the Regional Growth Centre occurs
within Sligo’s main urban built-up area, through regeneration and consolidation on infill and brownfield sites.

IV. **Sligo RGC-O-4**  Enhance intra-urban access by providing an additional north-south connection by means of the Eastern Garavogue Bridge and Approach Roads Scheme, to be completed by 2021.

V. **Sligo RGC-O-5**  Kick-start development to the south-west of the urban core by completing the Western Distributor Road by 2020.

VI. **Sligo RGC-O-6**  Prioritise new residential and employment-related development on greenfield sites in the areas served by the Western Distributor Road at Caltragh and Oakfield, and at Ballinode, which will be served by the Eastern Garavogue Bridge and Approach Roads Scheme.

VII. **Sligo RGC-O-7**  Improve urban circulation by increasing junction capacity along Sligo’s Inner Relief Road (N4/N15) and provide new link roads, as necessary, to complete the “ring route” around the town centre.

VIII. **Sligo RGC-O-15**  Upgrade the town centre environment through focused interventions in O’Connell Street, Stephen Street and car park, Rockwood Parade, Market Cross, Old Market Street and Quay Street car park, followed by gradual improvements of streets adjoining the centre.

IX. **Sligo RGC-O-16**  Prepare/commission and implement a new masterplan for the Centre Block (Wine Street car park).

X. **Sligo RGC-O-17**  Complete the remaining phases of the major recreational complex planned at Cleveragh Estate and Doorly Park, adjoining the Garavogue River.

XI. **Sligo RGC-O-18**  Continue the expansion of cycleways and walking routes throughout the urban area and outwards to the satellite villages of Ballysadare, Strandhill and Rosses Point, linking into established and planned recreational trails such as Union Wood, Knocknarea etc.

XII. **Sligo RGC-O-8**  Promote the consolidation of the existing IDA Business Park at Finisklin and the possible expansion of other business and enterprise activities into the northern Docklands areas.

XIII. **Sligo RGC-O-9**  Facilitate the development of a new IDA Business Park at Oakfield, to the south-west of the urban core.

XIV. **Sligo RGC-O-10**  Encourage new companies to locate on lands zoned for business and enterprise at Ballytivnan and Rathbraugham, to the north of the urban core.

XV. **Sligo RGC-O-11**  Strengthen physical connectivity by improving national road links to Dublin (N4), Galway (N17) and Letterkenny (N17), as well as the cross-border link to Enniskillen/Belfast (N16).

XVI. **Sligo RGC-O-12**  Implement the infrastructure and equipment needed to transform Sligo into a ‘Smart City’, able to provide advanced digital services to citizens and businesses.

XVII. **Sligo RGC-O-13**  Support the development of a major tourism attraction in Sligo Town, as well as further expansion of the tourism functions of the satellite villages of Strandhill and Rosses Point.

XVIII. **Sligo RGC-O-14**  Seek to increase the overall number of jobs in the Regional Growth Centre to approximately 16,000 by 2040.
Section 3.6D – Athlone Regional Growth Centre Strategic Plan (RCSP)

Submissions Received: 2019099, 2019122, 2019126, 2019138, 2019077, 2019112, 2019049, 2019067, 2019107, 2019146

High Level Summary of Issues

The question of consistency with the NPF, with other Regional Strategies, with other Regional Growth Centre Plans form a large number of the submissions received. There is a general consensus that Athlone is not portrayed as extensively or as well as it could be. One Local Authority intimates that legal action to protect the NPF is necessary. There is also reference to the absence of a statutory basis for a Urban Area Plan. The DHPLG suggests that similarity to the Strategic Plan for Sligo is a good template to follow for Athlone and a unitary plan at regional level is desirable. The presence of environmental designations in the vicinity of Athlone will be influential in its development and their presence needs to be recorded.

Director’s Response

The most common submission in relation to Athlone was its lack of prominence in the Draft compared with our other Regional Centres of Letterkenny and Sligo. This issue has been discussed previously by the Assembly and I am aware of its intention with respect to increasing prominence and with its views on the consistent approach to our Regional Centres. There is indeed a widely held view in the responses to our consultation that Sligo is a good example of how an RSCP should be delivered.

The delivery of the Athlone RCSP should be seen as an opportunity to identify and showcase how the town will develop over the next decade. The Assembly supports a holistic approach to a RCSP with an ultimate aim of securing future investment for the town and its environs. It would be worthwhile in this latter regard if an agreed form of new signage was developed to announce a new departure in the long history of Athlone.

The issue of Urban Area Plans (UAP) and Joint UAP needs to be addressed. This is not unrelated to the issue of prominence discussed above. The concept of UAP is referred to in the NPF in NPO 70 for towns and environs within the combined functional area of more than one Local Authority. There are many such towns in our region and indeed nationally, a non-exhaustive list would include Ballinasloe, Carrick-on-Shannon, Bray and Carlow.

These are all important towns in their own right, but they are not regional centres and they will no doubt become part of a Joint UAP in due course. The question for this iteration of the RSES for Athlone and this Assembly is whether we allow Athlone wait like the towns referred to above or allow it take the opportunity to fulfil its potential in 2019 and make an RCSP similar to Sligo etc. My
preference is for the latter, particularly which one considers as of now there is no legislative framework to prepare an UAP nor any timeframe for the delivery of the framework.

The issue of NPF compliance has been raised in a number of submissions, the sum of the comments above recognises that Athlone like Sligo fulfils a regional role greater than elsewhere, the influence of Athlone stretches well into Roscommon and Galway and due cognaisance needs to be taken of this. The authors and initial promoters of this NPF, the DHPLG have commended the Assembly on its Draft RSES and have not raised any issues in which the Draft is deemed to be at variance with the NPF.

The location of Athlone straddling our neighbouring region in the east presents a difficulty in delivering a RCSP because there is a somewhat different approach from each Assembly. There is more emphasis in this region on visual representations and the maps prepared to a large extent define our regional centres and tee them up so to speak to secure key investment. The approach in the east relies entirely on textual descriptions and leaves delineation of all its regional centres (including Athlone) until UAP have a legislative basis. In addition to the above there is inconsistency on population targets for Athlone. EMRA have set a target of 30,000 by 2031, NWRA have set a target of 30,000 by 2040. Our 2031 target is 27,000. This latter figure is consistent with the growth targets for Sligo and Letterkenny. It is also consistent with the targets set by EMRA for Drogheda and Dundalk. It is important for the credibility of both strategies that a consistent approach to population targets is made for all settlements within a particular category.

Lastly the Assembly receive observations from on the constraints that environmental designations may have on the future development of Athlone. These are mapped in the Draft document attached to this report and they will undoubtedly inform the future development of the Regional Centre.

Members had previously been circulated with the draft document referred to above which is a holistic approach to Athlone and does not segregate it into constituent parts. It is attached in Appendix 2 of this report.

**Director’s Recommendation**

1. The Assembly incorporate a RCSP for Athlone similar to the approach taken with its other Regional Centres and the holistic document issued to members on 07/03/2019.
2. The Assembly seeks to achieve consensus with EMRA on population targets for Athlone and that they be consistent with targets for other Regional Centres

**Section 3.7 – Regional Support Towns**

**Submissions Received:** 2019067, 2019134, 2019085, 2019130, 2019134

**High Level Summary of Issues**

- Key Regional Centre’s: Identify Key enablers for all places, which will underpin future growth of these Towns.
- Section 3.7 Proposed text for Castlebar, Westport and Ballina. Recognise status of Swinford, Charlestown, Ballyhaunis, Claremorris, Ballinrobe. Sequence of key towns to be reviewed.
**Director’s Response**

There is one general submission which requests that all towns identify key enablers, which will underpin growth. It is the intention that all key towns will be described in a consistent manner.

**Directors Recommendation**

It is recommended that the title of this section be altered to ‘key towns’ to ensure consistency with other RSES and terminology generally.
Section 3.7.1 – Key Town Ballina

Submissions Received: 2019112, 2019122, 2019026, 2019085

High Level Summary of Issues

The River Moy is an important environmental and economic asset to the town. There are queries on the data basis used to inform our Socio-Economic reports and subsequent Draft RSES.

There is commentary on the relative emphasis on road and rail infrastructure.

Director’s Response

The Assembly recognise the environmental designation and sensitivity of the River Moy and policies within the Draft are framed to protect its status, particularly the overarching environmental objectives.

There is some dispute on the accuracy of the data shown in Section 3.7.1. The Assembly have consistently used data form the Census 2016 as a reference for Ballina and other settlements. In the interests of consistency and comparative analysis this is considered a reasonable and accurate approach.

The Assembly received a submission from Mayo County Council on Ballina and its key priorities. These are similar to the existing text in the section, there is no objection to substantially incorporating them into the section.

Director’s Recommendation

1. Amend the text to substantially incorporate updated priorities as follows:

Ballina has a population of 10,200 (CSO2016) and is the second largest town in Mayo. The town has a strong focus on commerce and manufacturing with servicing and retail being the town’s second principle function. The town also has an administrative function including Government Departments and national bodies as well as the Mayo County Council. The town also serves a public health function provided by the district hospital. Ballina has nearly 5,000 jobs and a jobs/resident worker ratio of 1:36.

It has a strong town centre which has maintained its vibrancy through the location of supermarkets in the town centre minimising out of town retail development. The town has attracted significant single enterprises including Ballina Beverages, Lionbridge and Hollister. There is significant potential for regeneration within the town core particularly in the Market Square/Military Barracks area as well as potential riverside amenities along the River Moy.

There is capacity in public and private commercial/business parks and industrial estates situated within the town to cater for expansion of existing businesses and attract new industries and enterprises.

Ballina is strategically located in relation to the Atlantic Economic Corridor and has significant regional, national and international connectivity to capitalise on its location in terms of
attracting economic investment and associated social benefits. The town has rail connectivity to Dublin, as well as to the south should the Western Rail Corridor be realised. Ballina has the most significant rail freight activity outside of Dublin, providing a vital service to commercial/industry in the town and beyond and supports the transition to a low carbon region. The proximity of Ireland West Airport to Ballina benefits the town and significantly broadens the transport network capacity to an international catchment.

Key priorities for Ballina

- Build on Ballina’s strong enterprise and associated skills base, strong infrastructural base in terms of connectivity, Metropolitan Area Network (MAN) and proximity to the Atlantic Europe Connect (AEC) sub-sea telecommunications cable, Ireland West Airport Knock and the Atlantic Economic Corridor (AEC)
- Build on the significant tourism potential of Ballina through investment in tourism related infrastructure, including Monasteries of the Moy Greenway from Beleek to Killala, incorporating EuroVelo1 Atlantic Coastal Route, Mountain Biking Trail via Ballina connecting the Wild Nephin Ballycroy National Park to the National Mountain Bike Trail at Coolaney.
- Regeneration within the town core particularly in the Market Square/Military Barracks area and regeneration of the riverside along the River Moy is crucial to facilitate an enterprise-led regeneration of the town centre.
- Promote and support the uptake of under-utilised industrial and commercial space and expand upon the capacity of business parks/industrial estates in the town.
- Removal of barriers to development through enhanced road and rail connectivity to and from Ballina including:
  (i) Priority upgrade of the N26/N58 linking Ballina and the north west of the county to the N5
  (ii) Enhanced rail services (thereby supporting the transition to a low carbon region) to Dublin and commuter services between Ballina, Castlebar, Westport and Claremorris with connectivity to Galway and Limerick Metropolitan Cities and major international ports such as Shannon/Foynes, should the Western Rail Corridor be realised
  (iii) Continued investment in rail freight facilities at Ballina.

Objective

1. To support and grow the role of Ballina as the key economic driver in the north-west of the county, capitalising on its designation as a Key Town within the region in order to make it an attractive as a place to work, live and invest in.
Section 3.7.2 – Key Town Ballinasloe

Submissions Received: 2019122, 2019020, 2019130

High Level Summary of Issues
The submissions are generally supportive of the Assembly’s approach to the town and request references to infrastructure and the hospital in particular.

Director’s Response
The submission on this sub-section request reference be given to Portiuncula Hospital and re-ordering the priorities

Director’s Recommendation
1. Add reference to Hospital in first paragraph after ICT

Section 3.7.3 – Key Town Castlebar

Submissions Received: 2019122, 2019085

High Level Summary of Issues
The submissions request that some infrastructure projects that would benefit the town would be included in the section. It has commentary on the data basis used to inform the Draft RSES.

Director’s Response
The submissions request different emphasis on Castlebar in relation to its key priorities and it also queries some of the data on the town. The Assembly is willing to include many of the suggestions and will amend its text accordingly. It is conscious however of the length of the Draft and it will endeavour to avoid repetition of content. The issue of Castlebar/Westport as a linked hub has been dealt with elsewhere and need not be repeated in this section.

Director’s Recommendation
1. Amend text to include substantial elements of key priorities as follows:

Castlebar is the county town with a population of 12,100 (CSO 2016). It is the principal retail town in Mayo, home to multiples, with a real vibrancy within the town centre. Castlebar attracts shoppers throughout the county and provides a counter balance, albeit at a lesser scale, to Galway.
Castlebar is the main administrative, public health, education and commercial centre in the county and supports a wide diversity of manufacturing and service enterprise, providing over 9000 jobs, with a jobs/resident worker ratio of 1.920 (CSO 2016). GMIT (Castlebar campus), provides a strong education presence and offers a wide range of courses which continues to grow. In addition, the MSLETB is based in Castlebar. There is significant potential for regeneration within the town core particularly in the old Military Barracks area as well as significant tracts of land directly adjacent to the main streets which are accessible.

A significant number of large single enterprises, both indigenous and multinational (e.g. Fort Wayne Metals, Baxter), are located in Castlebar. The town has significant capacity in terms of business and technology parks and industrial estates, providing locations for new enterprises as well as the expansion of existing businesses. Castlebar has a number of infrastructural strengths, including rail connectivity to Dublin, as well as to the south should the Western Rail Corridor be realised, a Metropolitan Area Network (MAN) fibre optic, and close proximity to Ireland West Airport Knock. It is also well positioned to capitalise on its location with the Atlantic Economic Corridor.

Castlebar has significant tourism potential, as home to a nationally significant tourism attraction - National Museum of Ireland Country Life, Lannagh Holiday Village, greenway link to Westport. Castlebar has a broad range of public amenity, sports and recreational facilities. The town has significant potential to build on ongoing investment in a national outdoor pursuit’s facility and to position Castlebar as a location for sports tourism. Mayo County Council recently acquired lands adjacent to Lough Lannagh Holiday Village, which it is proposed to develop, as part of an overall Sports Tourism Development Plan.

**Key Future Priorities**

1. Continue to support and grow the role of Castlebar as the main administrative, public health and education centre in the county

2. Build on Castlebar’s strong enterprise and associated skills base, strong infrastructural base in terms of road and rail connectivity, Metropolitan Area Network (MAN) fibre optic with proximity to the Atlantic Europe Connect (AEC) sub-sea telecommunications cable, proximity to Ireland West Airport Knock and the AEC, which position the town as a location for further inward investment

3. Support the continued development of Galway Mayo Institute of Technology (GMIT), Castlebar Campus in its ambition to become part of a Technological University in the region.

4. Utilise and expand upon the capacity that exists within commercial/industrial estates and the business and technology park with an emphasis on developing a facility similar to Westport’s Leeson Centre

5. Improve cycle and walking tourism/recreational infrastructure and connectivity of the Great Western Greenway at Castlebar to Westport and Wild Atlantic Way and other tourism related infrastructure

6. Deliver on the potential for regeneration within the town core particularly the old Military Barracks as well as significant tracts of land directly adjacent to the main streets
7. Remove barriers to development through enhanced road and rail connectivity to and from Castlebar including:
   i. Upgrading of the entirety of the N5 to a Ten-T ‘High Quality Road’
   ii. Upgrade of N60 from Castlebar to Claremorris (critical link to the N17(AEC and Ireland West Airport Knock and SDZ)

Objectives

1. To support and grow the role of Castlebar as the main administrative, healthcare and education centre in the county and for commerce and enterprise, capitalising on its designation as a Key Town within the and its location in relation to the Atlantic Economic Corridor, in order to make it an attractive place to work, live and invest in.

Section 3.7.4 – Key Town Cavan

Director’s Response

There were no high level submissions specific to Cavan Town.

Section 3.7.5 – Key Town Carrick-on-Shannon

Submissions Received: 2019009, 2019019, 2019122, 2019067

High Level Summary of Issues
There are fears that the RSES could in some way inhibit the development of the town by restricting new residential buildings. The submissions request that greater emphasis be placed on the town and its potential including the provision of specific transport infrastructure. There is support for the preparation of a joint plan by Roscommon and Leitrim.

Director’s Response
Some of future opportunities identified for this key town contain detailed data and assessments on specific sites. This approach is very detailed when compared with how other towns are assessed is inconsistent. The detailed assessments are more appropriately dealt with at Development Plan or Local Area Plan level.

The Assembly received data on the scale of the workforce in the areas adjacent to the town and in the interests of consistency with how other key towns are assessed, it is not necessary to examine this data.
The Assembly note the proposal for a regional multi-sports facility and can support such a proposal.

**Director’s Recommendation**

Amend Key Future Priorities as follows:

**Key Future Priorities:**

- Develop the potential of Carrick-on-Shannon Business Campus by using the modern existing buildings for people intensive employment uses.

- Deliver support to existing businesses in Carrick-on-Shannon to ensure their continued existence and expansion.

- Promote research and development opportunities, building the capacity of the region.

- Promote the potential of the Metropolitan Area Network fibre optic cable managed by eNET is realised. This provides Next Generation Access Fibre Network that offers speeds of up to 100Mbps.

- Progress the sustainable development of the serviced strategic employment land that is available to the east of the town.

- Omit this Bullet Point - 6

- Development of the tourism offer and the thriving Purple Flag Status of the town that supports a variety of support enterprises in the surrounding countryside.

- Deliver on the Blueway development under the Upper Shannon Erne Future Economy project (USEFE); It will develop tourism in the rural areas of Cavan, Leitrim, Longford and Roscommon, connecting 22 towns and villages located alongside the River Shannon and the Shannon-Erne Waterway. Influence and assist with the broader economic development and job creation in the region. Carrick-on-Shannon is strategically located within this Blueway.

- Prepare a joint Local Area Plan with Roscommon to deliver an integrated framework for the future development of the urban area within 3 years of the adoption of this strategy.

- Support the development of the N4 By-Pass of Carrick-on-Shannon.

- Support the development of a regional Multi-Sports facility in the town.
Section 3.7.6 – Monaghan

Submissions Received: 2019135, 2019144, 2019122

High Level Summary of Issues
There are small amendments to text sought and a request that the Greenway Potential of the Ulster Canal be referenced.

Director’s Response
The inaccuracy in the infographics on Monaghan Town is noted and will be amended. The inclusion of sustainable travel as a key priority in the town is supported by the Assembly and will be included in the text.

Director’s Recommendation
1. Amend infographics on Page 149 to accurately reflect population and projections
2. Include additional bullet point supporting sustainable travel
3. Add the following to Page 148:
   • Support the provision of cycling, walking and smart travel initiatives set out in the Monaghan Land Use and Transportation Study

Section 3.7.7 – Key Town Roscommon

Submission Received: 2019067

High Level Summary of Issues
Clarity requested on delineation of town and on data/data sources used to inform draft.

Director’s Response
The map used in the infographics on Page 151 is of Roscommon Town as defined by the CSO. This is the same information base used for all other key towns and in the interests of consistency it should be retained.

The figure in relation to zoned land 294ha was obtained from residential land availability survey 2014 (as was similar data for other towns) prepared for DHPLG. The Assembly note the comments and say the figures recorded do not necessarily relate to serviced land nor do they impact on zonings that have emerged since the survey was completed. The Department have not updated the survey in the interim.

The data used in relation to labour force is based on Census 2016 and is common to all Key Towns.

**Director’s Recommendation**

No changes.

**Section 3.7.8 – Key Town Tuam**

**Submissions Received:** 2019135, 2019144, 2019122

**High Level Summary of Issues**
Similar comments in relation to data/data sources as other Key Towns. The proximity of Tuam to Ireland West Airport Knock should be referenced.

**Director’s Response**

There are comments in relation to including a note on proximity to Ireland West Airport Knock, which is only 30 minutes travel time from Tuam and the omission of a phrase after the last bullet point.

The description of Tuam as being a centre of education is accurate even if it is 2nd level.

**Director’s Recommendation**

1. Include reference to Ireland West Airport Knock in first paragraph
2. Add ‘and public transport’ to last bullet point
Section 3.7.9 – Other Rural Areas

Submissions Received: 2019067, 2019066, 2019122, 2019137

High Level Summary of Issues

There are conflicting views on whether any status should be ascribed to the towns referred to in this section. Roscommon County Council are strongly of the view that references to Westport, Athenry and Virginia/Carrickmacross should be omitted whilst they fully support the inclusion of Ireland West Airport Knock. The contend the references above could undermine regional centres. The NTA in commenting on this subsection relate it to rural housing and express concerns in this regard.

This importance of the N% and its upgrade to Westport is part of the submissions in the context of the overall labour supply in an extended Westport area. There is support for identifying Athenry as an important settlement close to Galway.

There is support for the inclusion of Virginia/Carrickmacross in this section and a recommendation that reference to individual companies be made. There is a submission from shareholders of Knock Airport requesting additional text and objectives be included.

Director’s Response

The towns identified in this section have demonstrated particular characteristics which justify their inclusion, including inter alia their position/proximity to economic corridors, their positive jobs/resident workers ratio and their potential to contribute to the objectives of the RSES.

In furthering the development of these towns and their immediate hinterlands the concept of reverse commuting should be encouraged and supported. This, if it is successful will result in more economic and efficient use of resources particularly public transport.

The Assembly has previously expressed its support for the development of Ireland West Airport Knock and it is appropriate this continues.

Director’s Recommendation

1. Amend text on SDZ to include objectives
2. Insert new RPO’s on reverse commuting as follows:
   - The Assembly will support the concept of reverse commuting to encourage the increased and efficient use of resources particularly public transport.
   - Promote and support the strategic role of IWAK’s SDZ as a significant regional economic driver and a location for a business and enterprise hub.
Section 4 – Growth Ambition 1: Vibrant Region, Economy & Employment

Section 4.1. Our Approach / Section 4.2. Potential. / Section 4.3. Place Based Assets / Section 4.4. Place Based Approach.

Submissions Received: 2019007, 2019012, 2019077, 2019047, 2019147, 2019018, 2019020, 2019026, 2019052, 2019009, 2019144, 2019124, 2019047, 2019089, 2019142, 2019125

High Level Summary of Issues

In general terms the commentary in respect of Section 4 is specifically focused on the Sectors therein, particularly Tourism, and Renewables.

However. It is noted via a number of submission that There is little economic analysis in draft & there is an absence of climate change provision generally. There are a number of submissions which are generally supportive of the approach adopted in the Draft RSES. Some comments are specific to start ups, retail, FDI etc. and they are summarised below:

- In addition to diversifying the regional economy, there is also a need to strengthen the existing base – from agri-food, life sciences, med tech, healthcare, blue economy/marine, engineering, tourism, etc.
- Regional Employment Strategy: The RSES & NPF must integrate economic policy, and it is suggested that a Regional Policy Objective should incorporate the ambition to formulate a Regional Employment Strategy.
- An additional RPO should be included to encourage and support Monaghan & Cavan LEO and the IDA in the provision of serviced sites for enterprise & employment uses, potential relocation in light of Brexit.
- Develop Projects of Regional significance which will create employment.
- The sustainable development of Irish natural resources has an increasingly large role to play in the transition to a lower carbon greener economy. In particular, development of the zinc prospects located in the Northern and Western region could help to position Ireland as major international source of battery technology and raw materials.
- The RSES should also emphasise how critical access to higher-level education, apprenticeship programs, training and life-long learning is for exploiting opportunities across the region. The availability of skills to industry and employers is a key challenge for companies.

Smart Specialisation: The draft RSES proposes conducting a ‘Smart Specialisation’ strategy pilot. It is stated by DBEI that ‘Smart Specialisation’ is not a concept used in national enterprise policy and is defined very broadly in the draft RSES. To avoid confusion, DBEI recommends that any unclear terminology should be avoided. They advise that, more broadly, there is something of a conundrum as between building distinctive strengths (smart specialisation strategies), within an increasingly competitive globalised environment, while
also ensuring there is a degree of diversity in Ireland’s enterprise structure. Competitive research and innovation funding allows sectors to build on their strengths, according to DBEI, and clustering policies can enhance collaboration and encourage the dissemination of new technologies. However, national enterprise policy is also concerned with broadening Ireland’s employment base and strengthening the resilience of our economy. DBEI say that it monitors the composition of employment, exports and investment on an ongoing basis to remain alert to concentration risks. DBEI, through the enterprise development agencies, will continue to focus on facilitating market diversification, export growth, improving productivity across all sectors and enhancing clustering activities.

It is stated that IDA Ireland see an increasing complexity in the roles being created, technology skills becoming ubiquitous across roles, increasing demand for business professionals and a fall in the number of low-skilled jobs including back office support and basic manufacturing.

In supporting Indigenous / Start Ups the LEOs provide a ‘signposting’ service in relation to relevant State supports and can also offer advice and guidance in areas such as Local Authority rates, Public Procurement and other regulations affecting business. The LEOs offer grant aid to microenterprises in manufacturing and internationally traded services sectors which have the potential to develop into strong export entities, in addition to ‘soft’ supports in the form of training, mentorship and targeted productivity programmes.

**Directors Response**

The DBEI already has developed a regional approach to employment creation, which includes the Regional Enterprise Plans, which are geographically divided into the West, North West and North East (Cavan, Monaghan and Louth). They and future iterations shall assist in implementing the strategy contained within the RSES and it has been informed by their input. In general terms Sec.4.1 - 4.4 inclusive merit being condensed considerably. The RSES would benefit from a further narrative around the support provided by IDA, Udarás Na Gaeltachta, Enterprise Ireland and the LEO’s.

**Director’s Recommendation**

1. Make non material amendment, to condense the narrative across Sections 4.1 – 4.4 inclusive and reduce the number of Sub Headings.

2. Make non material amendment: P.158, where reference is made to number of jobs supported by the IDA, an additional reference to be made to employment supported by Udarás Na Gaeltachta, Ent. Ireland, and the LEO’s.
Section 4.5.1 – Tourism

Submissions Received: 2019067, 2019058, 2019065, 2019125, 2019133, 2019134, 2019068

High Level Summary of Issues

The were a number of supportive submissions which generally endorsed the approach taken to Tourism in the Region. In terms of identification of Tourist Destination Towns, there were submission which advocated naming multiple additional destinations, and others which suggested that the locations be removed, and these included a submission from Failte Ireland, which Recommended they be removed.

The Irish Tourist Industry Confederation (a representative body for the Irish Tourism Industry) stated Tourism Industry is now the second largest industry, and employer in the country, worth €9bn in 2018.

The focus in tourism now is on:
(i) Product innovation & differentiation
(ii) Differentiation
(iii) Environmental Sustainability
(iv) Value for money

They also point out the existence of a wide divergence across the Region, with some area’s continuing to attract large numbers, but Cavan, Monaghan, parts of Donegal, Mayo & Leitrim are not having a developed product. The way to grow such area’s is suggested as providing reasons to visit. Each of these area’s require a detailed plan

Further general comments include:
- Going forward Place-making & clustering of attractions are key to regional success.
- While the strategy is a welcome step, the major concern is the structures and processes for the implementation of any tourist plan or strategy. The public sector architecture is convoluted, with state bodies, regional assemblies, local authorities etc. requires clarity on decision making, and on investment decisions.
- Public monitoring of implementing policy is key to the success of the Tourism Industry in the years ahead, and the RSES should provide clarity on this.
- The importance to the region of National Parks, established in accordance with the International Union for the Conservation of Nature (IUCN) and are protected under law.
- The Promotion of Lough Ree, and Lough Arrow, as well as North Leitrim / North Sligo as a National Park.
- Increased Accommodation Capacity, Bed Stock & Failte Ireland will introduce a co-ordinated Regional & Seasonal Accommodation Plan to facilitate investment in accommodation.
- Build on the tourism potential of Sth. Connemara.
- The Draft Strategy identifies amenity attractions with growth potential such as Doe Castle, Creekslough and Errigal trail, Co. Donegal, and Portumna Forest Park, Co. Galway. All these attractions lie within or immediately adjacent to Natura 2000 sites and there should be
specific reference that these attractions are underpinned by areas of high nature conservation value.

- Welcome RPO 24 - The NIR clearly recognises the potential for adverse impacts to European sites to arise from tourism activities. There is also potential for impacts to biodiversity beyond the Natura 2000 network. The Draft RSES should clearly identify these potential impacts and set out how growth in the sector will be accomplished while meeting obligations in relation to Natura 2000 sites and protecting the habitats and species beyond the Natura 2000 network.

- p. 168 – It is not clear what the text ‘CORE ASSET: INDIGENOUS ENTERPRISE AND INNOVATION’ refers to.

- The statement at P 168 ‘Up to now, our Region has predominantly hosted domestic tourists …’ is incorrect. It is argued that latest data from Fáilte Ireland shows that in 2017 the West region received 1.9 million overseas tourists who spent €694 million compared with only 1.6 million Irish resident trips generating €353 million. It acknowledges that while the Border region (inc. Louth) did receive more Irish (1 million) than overseas visitors (0.7 million) in 2017, it is also incorrect to say that this is ‘predominantly’ domestic.

- The piechart states it shows the ‘Share of Tourists by County’ but it is not clear if it includes both overseas and domestic tourists/trips? Also it seems to show each county’s percentage share of the Region’s total, however if the data refers to overseas tourists, then combining county data to compile a ‘Region total’ would involve double-counting as the same tourist who visited a number of counties would be counted in each county. It would be important to clarify this chart. A chart showing each county’s share of Tourist Revenue may be more useful and avoids double-counting issues.

- Questions source of tourism projections on P169.

- Seeks clarification on what is meant by Destination towns and what is meant by the term ‘candidate’. It asks for clarity on the implication of being a candidate destination town.

- Seeks clarification on detail of proposed monitoring and management structures referred to at county level.

- If all activity outside of the Destination Towns is considered under the heading ‘Rural Tourism’ then Regional Policy Objectives should be tailored specifically relating to rural tourism. If it is intended that RPOs 34-36 cover rural tourism, it would be important to have a wider objective for rural tourism activities beyond water-based tourism and walking/cycling routes. It needs to also make reference to ‘community based tourism’ which is very strong in the region and all voluntary in nature. Festivals/events/summer schools is another key aspect of rural tourism and can be very important to bring tourism revenue to smaller towns and villages.

- Clarify how measures identified in RPO25 shall be promoted and the meaning of final bulletpoint is unclear.

- RPO26 – Asks if it is intended that any specific tourism investments would be listed/identified in the final RSES and considers that capital investment in tourism developments within the region is the most important objective necessary to promote the Region’s tourist industry. It suggests that this objective should be expanded beyond just investments by Failte Ireland, to also recognise the importance of facilitating investment by other organisations e.g. Local Authorities, Coillte, Waterways Ireland, private sector etc.

- Objectives 28 and 31 are the same.

- RPO32 – who shall be responsible for delivery?

- The Gaeltacht area is recognised as a unique, cultural, historical area with a sense of place. A new Gaeltacht destination marketing brand has been developed - is it appropriate to reference this as key development measure which has been undertaken.
Director’s Response
There are a number of alterations which have been suggested by Failte Ireland to give effect to the full extent of Tourism strategy across the region over the coming years, this includes reference to Visitor Experience Development Plans, which have not been referred to in the Draft. The framework in relation to Destination Towns, or Candidate Towns as they are referred to in the Draft, will be amended, and the always on Towns, as listed previously, will be described as Examples of Destination Towns. A number of the Objectives in relation to Tourism will also be reworked to reflect the above. It should be noted in the Draft that there are 13 RPO’s relating to Tourism.

Director’s Recommendation
1. Make non material amendments as follows:
   (i) P.168 – 4.5.1. Include Headline Tourism, at top of page. (Headline missing in Draft).
   (ii) P.168, omit pie chart, to be replaced by a more distinct graphic with Failte Ireland visitor numbers for 2018 by County in the Region.
   (iii) P.169, insert following text into introductory section: Visitor Experience Development Plans (VEDPs) will be continued to be prepared by Failte Ireland in association with a range of stakeholders, including Local Authorities, key stakeholders, and members of the tourism industry. These plans are developed in order to realise the sustainable economic potential of mature, and developing tourism area’s. VEPD’s are built on solid partnerships, and collaboration amongst local, and national stakeholders.
   (iv) P.169, last para. Replace Tourist Towns, with Destination Towns.
   (v) P.169, First para. RH Column, to read, a Tiered hierarchy of tourism provisions in both rural and urban area’s, to support the sustainable development of Destination Towns, in accordance with Failte Ireland’s Development Guidelines for Destination Towns.

2. Make a material amendment by deleting Regional Policy Objectives, 24, 25, 26. And replace with the following Objectives:
   (i) To support working with relevant landholders and recreational / tourism agencies to increase access to the Countryside and to our Coastal area’s, and to ensure maintenance and access to the existing network of trails, paths, ways etc.
   (ii) To support the maintenance of, and enhanced access to state lands, such as National Parks, Forest Parks, Waterways together with Monuments and Historic Properties, for recreation and tourism purposes.
   (iii) To support the preparation and implementation of Visitor Experience Development Plans (VEDPs) within the Northern & Western Region, to underpin the overarching regional tourism benefits and to promote the natural and cultural assets of the Regions.
3. Make non material amendment, P. 172, and 173 by removal of references to Destination Towns on WAW, and Always on Towns, i.e. Galway, Westport, Sligo, Letterkenny, Donegal Town, Cavan Town, Monaghan Town & Ballina and to reference them as Examples of Destination Towns.

4. Make Material Amendment, to the wording of RPO 31

**From:**
To ensure provision is made for the expansion in accommodation and facilities within Candidate Destination Towns. Supporting infrastructural investment will also be provided, including improvements to public realm, Transport Links, Accommodation, night time economy and the sustainably development of our natural and built heritage.

**To:**
To ensure provision is made for the expansion in accommodation, and facilities within key destination towns, such as Carrick on Shannon, Cavan, Roscommon Town & Athlone, together with necessary supporting infrastructural investments, including improvements in the public realm, Transport links, accommodation, the night time economy, and sustainable development of our natural & built economy.

5. Make non material amendment, p.176, Regional Policy Objective 35, to be relocated from the Hidden Heartlands Section, to P.172, under Objectives for the WAW.

6. Make non material amendment by amending the wording of RPO 32

**From:**
Ensure that 'Discovery Points' targeting the 'slow tourism' market are included for key towns (Carrick on Shannon, Athlone, Ballinasloe etc) as enabler for increasing bed nights and visitor numbers.

**To:**
To ensure Orientation and Information Points targeting the ‘slow tourism’ market are provided at key towns, such as Carrick on Shannon, Athlone, Cavan, Roscommon, and Ballinasloe, as enablers for increasing bed-nights and visitor numbers.

7. Make material amendments by including New RPO to read:
Implement the Shannon Tourism Masterplan and secure the necessary resources, and investment for same.
Section 4.5.2 – Renewable Energy & Low Carbon Future

Submissions Received: 2019067, 2019146, 2019047, 2019079, 2019131, 2019136, 2019018, 2019085, 20190140, 2019033, 2019134, 2019045

High Level Summary of Issues

Comments are generally supportive of the path being pursued by the Draft Strategy, particularly given the recent commitment by Government to pursue a Carbon Tax strategy, should the Country’s emission of Carbon continue to miss the targets committed to under international agreements to 2020 and beyond.

There is consensus that in pursuing a robust and ambitious policy framework for growing the renewable energy sector, 3 years is possibly too long to wait for a regional energy strategy. Other points of note include as follows:

- The RSES would benefit from an outline of the increase in Carbon costs through the lifetime of the plan, and the benefits through pursuing the path towards renewables. Provide an account of importance of transition to low carbon economy, provide an account of Ireland’s overall policy and initiatives.
- A broad welcome on the strong policy statements in the draft Regional Spatial and Economic Strategy in relation to renewable energy, in particular, the specific recognition given to the forthcoming REPDF and this should be retained in the final document.
- The potential contribution of the natural resources sector in Ireland to the climate change challenge should be explicitly recognised within the draft document, particularly given the region’s international standing as both a current and future producer of battery critical elements. The natural resources sector has the potential to contribute to the broadening of rural employment opportunities.
- An expansion in aggregate production and capacity will be necessary to enable the development of the necessary infrastructure to support the region as a place to live, work and recreate and meeting growth targets needs to be recognised.
- A development plan which incorporates the sustainable production of aggregates from local sources can significantly contribute towards the lowering of the carbon cost of construction.
- Energy efficiency programmes should be at the corner stone of any policy as this help businesses maintain competitiveness through cost reduction and also help consumers rude the burden on rising fuel costs.
- The establishment of a Regional Energy Agency/Regional Energy Hub should be considered a priority to implement government policy on energy efficiency and maximise government supports, and investment in the sector
- RSES should support investment in Biomass CHP and District Heating in number of locations in the North-West, starting with Sligo City and Environs
- Require Development Plans to map energy resources, energy and heat demand, availability of infrastructure and to utilise this evidence to identify optimum locations to develop a mix of green energy technologies to create low carbon economies.
- Require development plans to incorporate appropriate zoning of land to support investment in a mix of green energy investments, including Biomass CHP and District Heating Networks, in long-term embedded green energy infrastructure. Require the Mapping of land use suitable for short rotation coppice (SRC) and increased forestry cover.
A welcome for RPO39, states that Coillte wishes to be involved as a stakeholder and suggests that these sites of scale should accommodate energy storage solutions and/or other associated projects that may arise as technologies evolve in the future; This would take significant pressure off the national grid during periods of high demand.

- Mayo coast ideal for high level low carbon development, with Belmullet as a European energy hub.
- Prepare a Regional Decarbonisation plan in cooperation with CAROs.
- Failte Ireland is concerned there are (1) No guiding Principles set out in the energy Policy Section, and (b) RPO’S included in the draft and that there is no reference to landscape including their environmental features, which must be considered in routing / designing on or off shore grid infrastructure.
- Include key future priorities for all Key Towns that encourage actions that support transition to low carbon economy (mitigation) and actions that promote climate resilience (adaptation) and adapt to the consequences of a changing climate.
- Provides account of importance of transition to low carbon economy, providing an account of Ireland’s overall policy and initiatives.
- AMETS Site – No specific acknowledgment is given to the potential for constraints arising from the planned siting of renewable infrastructure on land or in the marine environment within the Natura 2000 site.
- State that the establishment of farm based energy cooperatives would create energy through the use of biodigestors – converting farm waste, slurry etc. into energy which can then be used on the farms and the wider community.
- Some form of regional targets for renewable energy production could be established and it is suggested that the WDC Insights Electricity Transmission for Renewable: What’s needed in the Western Region? may be useful to provide context for this discussion.
- A regional Energy Hub should be subject of a Regional Policy Objective - p. 180 – 1st paragraph is repeat from previous page.
- Greater community involvement in energy production, as well as development of district heating systems, should be included as a specific Regional Policy Objective. The RSES should acknowledge that new roles for local communities are emerging, whereby they are transitioning from being passive consumers to active prosumers with the possibility of local generation, demand response and energy efficiency measures. The energy transition will require significant mainstreaming of niche social and technical innovations to succeed at the community level, for example electric vehicles, heat pumps, smart meters, sustainable energy communities, domestic PV, and battery storage.
- It is unclear whether RPO39 is within the context of the Renewable Electricity Policy and Development Framework nor what criteria will be used to identify sites. It asks whether the identification of sites will relate to private investment decisions or whether this will purely relate to planning designation or zoning. RPO40 should include investment in necessary infrastructure and incorporate not just awareness but also acceptance of infrastructure necessary to deliver renewable energy opportunities.
- Additional text is recommended at the end of RPO44 as follows: ‘... in particular, advocating the areas of Combined Heat and Power units integrated into district heating networks, in combination with Pyrogenic Carbon Capture and Storage (PyCCS) or Bio-energy Carbon capture and Storage (BECCS).’
- Consider reference to public sector and publicly owned buildings within RPO45.
• Consider relocating RPOs 46 and 47 and the ‘Case Study on Gas’ to section 8.4 which deals with Gas Networks infrastructure as natural gas has not been discussed in section 4.5.2 which focuses on renewable energy as an economic sector. It is recommended that the inclusion of the phrase ‘... have regard to the location of existing gas infrastructure in assessing potential developments.’ should be re-considered as it could potentially further disadvantage those areas of the region which are not served by the gas network. It also suggests that the following text be added to the end of this RPO ‘... including the potential for gas to grid injection facilities along with anaerobic digestion facilities.’

• Recommend an additional RPO be added ...‘To encourage and support, where appropriate, the sustainable development of smart, decentralised power generation solutions with storage elements incorporated, allowing for a greater degree of flexibility and localised production (CHP, Battery storage).’

• Recommend an additional RPO be added ...‘Communities play an important role in the rollout of renewable energy technologies. RE needs to be located appropriately to minimise the impact to the surrounding communities, and the people that live closest to the technology.

• Reference should be made here to the LECo project funded under the EU INTERREG programme, the REACT project (funded under Horizon 2020) and Údarás na Gaeltachta and SEAI’s joint programme – The Regional Energy Development Programme. Údarás na Gaeltachta is working closely with SEAI to implement a renewable energy strategy in the Gaeltacht through the development of Better Energy Communities and Sustainable Energy Communities.

• The RSES should recognise that the Northern and Western region is a world class investment location for exploration and mining companies and is currently host to a major producing gypsum mine while there is an extensive mining history that includes Tynagh, Arigna, and Abbeytown where advanced stage exploration is currently ongoing. The region is an internationally renowned exploration destination with potential for metal exploration, particularly in the more rural areas. Known major base metal occurrences are found in Roscommon, Sligo and Galway while Monaghan, Mayo and Donegal are internationally attractive destinations for gold exploration, including the Clontibret gold deposit, the potential employment and sustainable development benefits of this sector to rural communities should be explicitly recognised within the Spatial and Economic Strategy of the Regional Assembly.

**Director’s Response**

Whilst there are 9 Regional Policy Objectives in relation to Renewable Energy & Low Carbon ambitions for the Region, commentary which raises concern that there is an absence of guiding environmental principles surrounding such policy are noted but environmental issues cross cutting and thus specific strategic environmental objectives are highlighted within the opening chapter of the RSES.

**Director’s Recommendation**

1. Make non material amendment to narrative on P. 177, 178 & 179 as an introduction to Renewable & Low Carbon.
2. Make non material amendment by amending the map on P. 178 providing a title / explainer, and in addition ensuring that the illustration of wind farms is clear on the map.
3. Make non material amendment to text to include a specific narrative on Carbon Taxes, the potential cost to the region should the RSES fail to fasttrack a number of low carbon
objectives, and there should also be acknowledgement in this section of the Climate Action Regional Office, their role, and the ongoing threat of Climate Disruption.

4. **Make non material amendment to wording of RPO 39:**

   **From:**
   
   The NWRA shall co-ordinate the identification of potential renewable energy sites of scale in collaboration with Local Authorities and other stakeholders within 3 years of the adoption of the RSES.
   
   **To:**
   
   The NWRA shall co-ordinate the identification of potential renewable energy sites of scale in collaboration with Local Authorities and other stakeholders within 3 years of the adoption of the RSES. The identification of such sites (which may extend to include energy storage solutions) will be based on numerous criteria including appropriate Landscape classifications, and potential grid connections.

5. **Make non material amendment to wording of RPO 44**

   **From:**
   
   Support and encourage the development of the bio-energy sector, and facilitate its development for energy production, heat and storage distribution.
   
   **To:**
   
   Support and encourage the development of the bio-energy sector, and facilitate its development for energy production, heat and storage distribution in particular, advocating the areas of Combined Heat and Power units integrated into district heating networks, in combination with Pyrogenic Carbon Capture and Storage (PyCCS) or Bio-energy Carbon capture and Storage (BECCS).

6. **Make non material amendment to RPO 45:**

   **From:** Promote innovative new building design and retrofitting of existing buildings to improve building energy efficiency, energy conservation and the use of renewable energy sources in accordance with national regulations & policy.
   
   **To:** Promote innovative new building design and retrofitting of existing buildings, both private properties, and publicly owned, to improve building energy efficiency, energy conservation and the use of renewable energy sources in accordance with national regulations & policy.

7. **Make non material amendment by relocating RPO’s 46 & 47 to Sec. 8.4 and reword RPO 47**

   **From:**
   
   Encourage and support the innovative partnerships extending the gas networks in the Region.
   
   **To:**
Encourage and support the innovative partnerships extending the gas networks in the Region, including the potential for gas to grid injection facilities along with anaerobic digestion facilities.

Section 4.5.3 – Agri–Food

Submissions Received: 2019101, 2019058

High Level Summary of Issues

Gas Networks Ireland is generally supportive of the Draft RSES, and the drive towards renewables. GNI encourages the NWRA to promote the build out of anaerobic digestors, to assist in the provision of renewable gas, which is sustainable, and carbon neutral, and has the capacity to reduce the country’s carbon footprint.

It is stated that Anaerobic Digestion is one way in which Irish agriculture can continue to grow its output while at the same time reduce its carbon emission through the production of bio methane. Establishing bio-digestor cooperatives would allow farmers from the same area come together and establish these cooperatives, reducing the cost for them at an individual level while also reducing their carbon emissions.

Statement that agriculture will have to change drastically to join the low carbon future on this island is a sweeping general statement and will have to be removed. A number of established agricultural practices are already sustainable, and some upland farms, which contain bog, and peat soils are already sequestering more carbon that they produce. Agri–Food section generally is too short and should be expanded to elaborate on how it will contribute to the Region in the coming years.

In summary, further substantive points made are summarised below:

- Add and bioeconomy to Agrifood heading. (4.5.3. p. 182).
- There is no acknowledgment of the significant role this sector must play in the achievement of the objectives of the nature directives and no net loss of biodiversity generally and of the inter-dependent relationship between agriculture and nature conservation.
- Consideration should be given to the inclusion of a specific RPO addressing the need for the agriculture sector to contribute positively to the achievement of biodiversity goals.
- Should support awareness of European Innovation Partnerships, which are a new and fresh approach to research and innovation for better and more sustainable agriculture productivity. EIPs allows for the pooling of expertise and resources by bringing together public and private sectors at EU, national and regional levels, combining supply and demand side measures.
- Data quoted is from the CSO Business Demography dataset and that there are limits to this data, not least that it does not differentiate agri-food processing among the ‘Manufacturing’ sector and also does not include the ‘Agriculture, forestry & fishing’ sector. Recommends the use of data specific to NWR and suggests that in addition to quoting the share of persons employed in the ‘Agriculture, forestry & fishing’ sector.
sector in the Region (7.5%), it would also be important to note the numbers working in agri-food processing.

Based on Census 2016, there were 7,973 people employed in the Northern & Western Region in ‘Food, Drink & Tobacco’ processing (elements of the Manufacturing sector), this was 2.3% of total employment, higher than the 2% share nationally. Should highlight that, while farming in much of the Region is part-time, extensive and not profitable or very commercial, it nonetheless contributes to the regional economy and is important in contributing to national beef and sheep output. It has a very different character to farming in other parts of Ireland. The pattern of agriculture in Cavan and Monaghan differs from the rest of the Region and discussing this is important within the context of issues for agriculture in the rest of the Northern & Western Region. For Cavan 11.3% are employed in ‘Agriculture, forestry & fishing’ (highest in Ireland) and 6% in ‘Agri-food processing’ whilst for Monaghan it is 11.2% and 5.2%.

- p. 182 – While reductions in GHG emissions are, of course, very important, the survival of family farms in the Region is also critical.
- p. 182 – Monaghan/Cavan – Central Border Region: The first paragraph of this section appears to refer to the entire Northern & Western region, whereas the heading refers to Monaghan/Cavan.
- Giving figures for the entire ‘Manufacturing’ sector is not very helpful, also the statistic ‘25.3% of the total number of employees’ actually only refers to manufacturing’s share of employees in ‘Business Economy’ enterprises which excludes, Agriculture, Health, Education, Public Administration and Other Services sectors, so it greatly overestimates its role.
- The potential impact of Brexit on the Agri-food sector needs to be included and discussed. Several reports have estimated the potential impact and specifically identified the Northern & Western Region as being vulnerable.
- Delete RPO52 as it repeats RPO49
- RPO54 has not been discussed within the text and it is also suggested that the wording be modified as follows: ‘To support the potential creation of appropriately scaled local MULTI feedstock bio-refining hubs across the Region as well as potential creation of bio-districts/clusters.’
- RPO55 may sit better within Agri-food and it would also be useful to have some discussion on the potential of the gastronomy sector and its links with development of the tourism sector.
- Additional RPO recommended as follows: ‘To support the future proofing of infrastructure planning to allow for the potential upgrading of existing industrial sites to bio-refining plants while also supporting the use of bio/renewable energy for production of bio-based products.
**Director’s Response**

There are 7 objectives within 4.5.3. The heading of this subsection should be amended to reflect the role of the Bio-Economy. There is merit in adding one further objective to this section and to amend the wording of an additional 4 RPO’s taking account of the Submissions received.

**Director’s Recommendation**

1. **Make non material amendment** as follows:
   (i) at P.182 by changing the headline from Agri-Food to Agri-Food & the Bio-Economy.
   (ii) Revise all data set out in Para. 2 of p. 182, reviewing its relevance and its accuracy, and amend as necessary.
   (iii) Insert additional commentary, and highlight the need for agriculture to contribute towards the challenge of climate change, the need to increase low carbon measures.
   (iv) Review extent of wording within the first section of 4.5.3, with a view to reducing the extent of same.
   (v) Merge RPO’s 52 with 49 so that RPO 52 is deleted and RPO 49 reads as follows:
      To support the growth of the Region’s agri-food industry, and its SME’s. The expansion of the sector where already established in Rural Area’s, as well as small towns, and villages where expansion should be facilitated.
   (vi) **Amend wording of RPO 53**
      From:
      To support the Bio-Economy and to review the RSES upon the introduction of a Bio-Economy strategy for Ireland, and assist in implementing measures to enable such a strategy.
      To:
      It is an objective to support the National Policy Statement on Bio-economy (2018) and the exploration of opportunities in the circular resource efficient economy including undertaking a bio-economy feasibility study for the Region. This feasibility study will aim to identify (and map) areas of potential growth to inform the National Transition Agenda, enabling a low carbon climate resilient nation.

(vii) **Amend wording of RPO 54:**
      From:
      To support the potential creation of appropriately scaled local feedstock bio-refining hubs across the Region.
      To:
To support the potential creation of appropriately scaled local multi-feedstock bio-refining hubs across the Region as well as potential creation of bio-districts/clusters.

(viii) Relocate RPO 55, from P. 187, to P. 183, which will enable its location with similar objectives, relating to Agri-Food.

2. **Make material amendment by inserting additional RPO to read as follows:**
   To support the future proofing of infrastructure planning to allow for the potential upgrading of existing industrial sites to bio-refining plants while also supporting the use of bio/renewable energy for production of bio-based products

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**Section 4.5.4 – Marine & Blue Economy**

**Submissions Received:** 2019101, 2019058, 2019020

**High Level Summary of Issues**

There are a number of lengthy submissions in relation to Marine & the Blue Economy, these include references to same from Local Authorities Galway, Mayo and Donegal, as well as Udarás Na Gaeltachta, WDC, and Foyle Port. Reference to extent of material coming through Foyle Port in agri-food. Foyle Port suggest that P.190 be amended wording to reflect Foyle Port as a cross border entity. Suggested RPO which is specific to Foyle Port: *To support the sustainable expansion & upgrade of Foyle Port, including increased capacity for cruise ship berthing, as a part of the strategy to grow the North West City Region and increase international visitor number*

Galway Harbour is referenced as an important transport and economic asset. Welcome is provided for RPOs 61 and 62. And also suggest that Galway should be a Tier 1 port as part of TEN-T network. If funding is available, deep water facility and regeneration lands will become available. It also states that information on Galway port should be included in MASP. It is also suggested that the RSES should:

- Welcome RPO59 - reference to create a Marine Resource Innovation Park at Greencastle.
- A clear coastal/maritime environment policy should be integrated into the RSES at a high level.
- A specific priority objective in the RSO’s be made for coastal and marine Natura 2000 sites and the conservation of the wider coastal and marine environment.
- RPO 60 is welcomed but a clearer objective regarding the protection to be afforded to Natura 2000 sites should be included.
- RPO62 supports the expansion and upgrade of Galway Harbour. The proposal for the redevelopment of Galway’s inner harbour area does not acknowledge the Natura 2000 designations (Galway Bay SAC and Inner Galway Bay SPA) that extend into the harbour area.
- Remove reference to IROPI in respect of Galway Port
- GNI welcomes the reference to the Corrib Field, and the ongoing supply from same reduces dependence on imported fuels.
- It suggests that the section ‘Our Marine Regional Assets’ on p. 192 should be moved here to appear before the ‘Fisheries’ section as many of the regional assets listed are referred to on p. 188-191 so it would be more useful if they were discussed earlier. RPO64 should also be relocated here.
• Recommends a specific heading for ‘Marine Research’ should be added as a regional asset including the Marine Institute and Ryan Institute at NUIG, with a focus on their role in marine research and the potential for this to drive future development of the blue economy.
• In order to support RPO58 it would be useful if the preceding discussion made some reference to the requirement for land-based infrastructure to support development of Marine Renewables, including transmission infrastructure, and the planning implications of this.
• RPO60 – it could be useful to link this with the water-based tourism objective included under the Tourism section (4.5.1).
• Questions the text in RPO61 that relates to Galway Harbour and port as its focus is cargo and tourism, not aquaculture and seafood.

**Director’s Response**

Whilst the Draft RSES is supportive of all harbours and ports throughout our Region, there are specific requests for Regional Policy Objectives, and recognition for certain projects above and beyond what is referenced in the Draft, a number of these projects are already acknowledged.

**Director’s Recommendations**

1. **Make non material amendments as follows:**

   (i) Relocation of the section ‘Our Marine Regional Assets’ on p. 192 to appear before the ‘Fisheries’ section as many of the regional assets listed are referred to on p. 188-191. RPO64 should also be relocated here.
   (ii) Delete Reference to Galway Port in text, in para. 2 of P. 188 as Galway is not a fisheries port.
   (iii) Relocate RPO 60, from Sec. 4.5.4 to 4.5.1. (Tourism).
   (iv) Amend contextual text between RPO 61 and 62 to read that the upgrade of Galway Harbour & Port continues to represent a key strategic priority for the Western Region. The ambition to upgrade Galway Port will allow for the facility to serve a dual role as a commercial port for Cargo, and also as destination point for cruise tourism.
   (v) Amend wording of RPO 162

   **From:**
   To support the expansion & upgrade of Galway Harbour & Galway Port (under IROPI) as part of the overall vision to grow Galway as a City Region.

   **To:**
   To support the expansion & upgrade of Galway Harbour & Galway Port as part of the overall vision to grow Galway as a City Region, subject to environmental and visual considerations, as well as transport and economic viability requirements.
Section 4.5.5 - Information & Communication Technology:

Submissions Received:
2019067, 2019122, 2019106

High Level Summary of Issues

There were no specific submissions in relation to ICT, however, the Sector is referenced in a number of broad ranging submissions, including those by WDC, and IBEC. It is considered appropriate to merge Sec 4.5.5. ICT, and Sec. 4.5.6. Med-Tech into a single section, and there are no objectives within Sec 4.5.5. to alter or amend. Further general comments received are set out below:

- Title the section ICT and also to include some reference to the needs (e.g. skills, transport infrastructure) of the manufacturing sector.
- Suggests that regional figures would benefit the RSES and that in 2016 there were 9,436 people employed in ICT Services in the Northern & Western region plus 854 in computer manufacturing (Census 2016). The current low level of activity in the Region is one of the key issues for the sector.
- The region is attractive to ICT multinationals as there is a cost factor to locating in Dublin, as well as quality of life benefits and it would be an important factor to include here. The increasing attractiveness of regional locations, due to current pressures in Dublin, is a key asset in growing this sector.
- Raises concern that the comment ‘The great place to live arguments will be augmented by great place to work arguments if/when the NBS[P] coverage expands.’ is overly negative. It identifies that while much still needs to be done in relation to the roll-out of next generation broadband across the Region, considerable progress has been made by private providers, particularly in the Region’s larger urban centres. It states that areas of the Region already have the necessary broadband to facilitate ICT remote workers and do so. Implying that the Region will only be a ‘great place to work’ if/when the National Broadband Plan is implemented underestimates the Region.
- Should highlight the opportunity for expanding remote working, with ICT workers who may work for a company based in Dublin (or elsewhere), but work remotely from the NWRA region (their home and/or a digital hub) as another opportunity.

Director’s Response

The submission as set out above raise queries on text, there are no specific objectives in the Draft RSES in relation to ICT Services.

Directors Recommendation

1. Make non material amendments by reduction in narrative, with a view to merging Sec. 4.5.5. with 4.5.6 (Med-Tech).
Subsection 4.5.6 – Med Tech

Submissions Received: 2019089, 2019122, 2019139

High Level Summary of Issues

Several submissions were general in nature and which covered the entire RSES, including submissions by IBEC, and the WDC, offering a number of suggestions to partially change the text, and make up of the objectives in respect of Med-Tech. The following captures the substantive commentary:

- **RPO 65** - The role of the Regional Skills Fora initiative is essential to delivering the ambition of the RSES in this regard and should be referenced in the RSES. It can complement other initiatives such as mentoring or knowledge-sharing programmes.
- **important to provide some regional context to emphasise the sector’s strength and that in 2016 there were 11,568 people employed in Med Tech in the Northern & Western region, this was 41.8% of the State total (Census 2016). Employment in Med Tech grew by 27.7% between 2011 and 2016 in the NWRA region. Galway accounted for 28.3% of the 27,669 people employed in medical devices nationally in 2016 and the West region accounted for 36.1%.
- **Important to note that whilst indigenous companies account for over 60% of companies in the sector, these are very much smaller in scale. Nationally, for agency-assisted companies, Irish-owned Med Tech firms only account for 2.4% of total employment in the sector (DBEI, Annual Employment Survey 2017).**
- **The length of time required for approval of a new medical device is a minimum of 10 years and the sector requires very high levels of venture capital investment to support new product development. These requirements often lead to indigenous Med Tech start-ups being acquired by multinationals / investors in order to get a new product to final approval.**
- **p. 197 – Much of the text on the Galway cluster repeats p. 195, it would be better to combine both.**
- **Consider use of the text under Sligo Med Tech Cluster**
- **RPO65 – what type of forums are intended and who would organise?**
- **RPO66 - does this refer to ICT and Med Tech or more widely across sectors of the economy? A similar RPO would be important for other sectors such as Agri-food, engineering, pharmaceuticals etc.**
- **RPO67 – clarify this would be facilitated and name key stakeholders in encouraging such convergence.**
- **There are two ‘Regional Policy Objective 67’ and ‘Regional Policy Objective 72’ is missing.**
- **It is noted that RPO’s 67-69 seem to be general recommendations and it questions if it intended they only apply to ICT and Med Tech companies, or more widely? It also notes that for many technology companies in particular, venture capital finance is the key requirement and recommends that a specific objective related to accessing venture/risk capital type finance should be added.**
- **RPO70 is included in the absence of any context being provided within the text and questions its inclusion. Support work of the Regional Skills Fora in establishing industrial training needs at a sectoral level.**
Director’s Response

As set out under 4.5.5. it should be considered appropriate to merge Sections 4.5.5. and 4.5.6.

Director’s Recommendation

1. Make non material amendments as follows:
   (i) Reduce narrative, with a view to merging Sec. 4.5.5. with 4.5.6 (Med-Tech).
   (ii) Delete text in respect of Galway Cluster and Sligo Cluster as it is repetitive of text on P195
   (iii) P.197, amend numbering to RPO’s, 65 – 71, to remove duplicate numbering.
   (iv) Amend wording to RPO 65 to clarify the precise purpose
       From: Support the establishment of appropriate forums to enable industry thought leaders in Ireland to share knowledge and to identify critical competencies and skills needed to align with emerging business models.
       To: Insert revised objective to clarify what forums we are referring to, what skills we are referring to? Presumably Med Tech related, and what business models we are referring to, otherwise delete.
   (v) Merge RPO 71 with RPO 67 and delete RPO 71. Revised wording to read as follows: To Support funding opportunities for indigenous start-ups, together with the provision of education & research opportunities that will foster the continued success of MedTech across our Region.

Section 4.5.7 – Retail

Submissions Received: 2019122

High Level Summary of Issues

Several submissions highlight the complex role of Town Teams, and it is pointed out these Teams have a multiplicity of roles not just retail.

Director’s Response

Single Change to RPO 76 only 1 proposed change to Section 4.5.7.

Directors Recommendation

- Amend RPO 76 TO Incorporate the following: The rollout of a peer learning programme shall be developed by the NWRA in collaboration with interested stakeholders, which will be of benefit and may assist in supporting the vibrancy and vitality of the core retail areas of town centres.’
Section 5.0. Growth Ambition 2 – Environment, Natural Region

Submissions Received:

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Section 5.1. Economic Progress & Environmental Impacts:

Submissions Received: N/A.

Director’s Response: N/A

Director’s Recommendation

No changes recommended

Section 5.2. Environment & Heritage

Submissions Received: 2019003, 2019045, 2019119

High Level Summary of Issues

In order to provide for consistency with the Climate Act 2015, the National Adaptation Framework 2018 and the National mitigation Plan 2017 the following RPO is recommended for inclusion within the RSES:

**New RPO** ‘With the assistance and support of the Climate Action Regional Offices, Local Authorities shall develop, adopt and implement local climate strategies, which shall address issues including local vulnerability to climate risks and identify and prioritise actions in accordance with the guiding principles of the National Adaptation framework, National Mitigation Plan.’

It is strongly recommended that the RSES includes an Objective which specifically addresses the need to identify the coastal areas that are vulnerable to climate change in the Northern and Western region.

Local Authorities must ensure they have adaptation strategies to deal with changing weather patterns, storm surges, increased freshwater runoff etc, in particular the coastal counties along the Western Seaboard must ensure this is done. Therefore, the Draft RSES should include a firm emphasis on the vulnerability of the Northern and Western Region to climate change and require constituent Local Authorities to devise and prepare adaptation strategies.
Director’s Response

The proposed addition of a specific objective relating to Climate Change Strategies is reasonable, and given recent weather events, and the changing patterns of more severe storms along the Western seaboard, the need to identify vulnerable coastal area’s is also an area where Local Authorities should focus some attention in years ahead. The incorporation of this into the text of the RSES is recommended, and one Policy Objective should be adequate in this regard.

Director’s Recommendation

Insert New RPO as a Material alteration:

With the assistance and support of the Climate Action Regional Offices, Local Authorities shall develop, adopt and implement local climate strategies, which shall address issues including local vulnerability to climate risks and identify and prioritise actions in accordance with the guiding principles of the National Adaptation framework, National Mitigation Plan.

Section 5.3. Our Landscape

Submissions Received: 2019140, 2019057, 2019078

High Level Summary of Issues

It is suggested in one submission that the Regional Assembly take steps to Prepare a Regional Landscape Character Assessment (LCA), and as a result, RPO 78 should be amended.

It is also suggested A National Landscape Character Assessment should be pursued as a matter of urgency.

Director’s Response

The National Landscape strategy has been published by the Dept. of Arts, Heritage & Gaeltacht. It sets out the aim to deliver a National Landscape Character Assessment, together with Guidelines and thereafter local Authorities would develop a LCA for their respective areas. Thus the first step is for the national LCA to be completed. The suggestion that a Regional LCA be prepared is something that would have merit and which is supported but this may ultimately be subject to the view contained within the Guidelines that are to be prepared. However, it is also considered that the provisions of RPO78 should be retained as an appropriate objective in the interim.

Directors Recommendation

Insert new objective and amalgamate RPO’s 77 &78 as follows:

From:
77. Protect, manage and conserve the quality, character and distinctiveness of our landscape and seascape.

78. The Assembly supports co-operation and co-ordination between local authorities in determining landscape character along their borders. A targeted review should be undertaken to ensure consistency in classification and policy in adjoining areas of similar character. The NWRA will assist in collaboration and co-ordination.

To:

(a) Protect, manage and conserve the quality, character and distinctiveness of our landscape and seascape.

(b) The Assembly supports co-operation and co-ordination between local authorities in determining landscape character along their borders. A targeted review should be undertaken to ensure consistency in classification and policy in adjoining areas of similar character. The NWRA will assist in collaboration and co-ordination.

(c) Following completion of the National Landscape Character Assessment, and any associated statutory Guidelines, the Regional Assembly shall prepare a Regional Landscape Character Assessment to promote improved landscape management and consistency.

Section 5.4 – Our Natural Heritage

Submission Received: 20191119

High Level Summary of Issues

At least 2 Submissions highlight the issues of Climate Change, and the inter-linked challenge of greater and more frequent storm surges along the Atlantic Coastline in Ireland. In this regard it is suggested the RSES identify and map coastal areas that are most at risk of coastal erosion / change and sea level rise and to provide for buffer zones to limit negative impacts of climate change. It is suggested that Local Authorities should include a preference in their development plans for ‘working with natural processes’ when undertaking coastal protection works (which is consistent with the Marine Strategy Framework Directive MSFD). This will promote natural resilience to climate change in coastal zones. It is further suggested the RSES state that all options including planned retreat from the coastline, prohibition of new development in vulnerable coastal zones and facilitating intertidal zone migration will be considered when engaging in adaptation planning for the coastal zone.

Director’s Response

The recommendation under Sec. 5.1 includes an addition of an objective on Climate Change & adaptation measures, with a requirement of Local Authorities to examine same. This arguably covers the focus on coastal erosion, and vulnerability in terms of development along the Region’s coastal area’s.
Directors Recommendation

No change to the existing Draft.

Section 5.5 – Our Natural Assets

Submissions Received: 2019067, 2019140,

High Level Summary of Issues

One submission alerts the Assembly to an error in print, in that, ‘Lough KEY’ is misspelt, and ‘Lough Ree Forest Park’ should be ‘Lough Key Forest Park’.

National Parks: It is submitted that the Region currently has more National Parks than any other Region in the country, and this is an asset in itself. It is further suggested in a submission that there could be scope to increase the number of National Parks in the West and North West, and specifically the area of North Leitrim / North Sligo within the hinterland of Ben Bulbin should be considered. In the UK the model of National Parks where villages and settlements are contained therein should be considered here. Lough Arrow and Lough Key, along the Sligo / Roscommon border should also be considered.

Peatlands: A number of submissions recommend that peatland policies and objectives are included as a separate item in the Draft RSES and that they are recognised as a valuable habitat in their own right.

It is submitted that peatlands and their supporting wetland environs are particularly sensitive to hydrological change as well as water and airborne pollutants (nutrients) that are associated with settlement growth and agricultural intensification. The EPA recommends that there is specific reference to ammonia deposition as a potential pathway for impact to peatland habitats in the Assembly area as adverse impacts to peatlands can be driven by changes resulting from activities undertaken at a considerable distance from a site. The RSES should incorporate a clear commitment to peatland conservation with reference to the aims and objectives of the National Raised Bog Special Areas of Conservation Management Plan 2017- 2022 and the National Peatlands Strategy.

Director’s Response

The Region already benefits from having more National Parks than the other Regions in the Country, the 2 specific area’s referenced have outstanding natural assets, and there is certainly merit in exploring the possibility of expanding the number of National parks in the aforementioned areas.
Director’s Recommendation

1. Add the narrative to end of Section 5.5 as follows: There is potential scope to expand the range, and remit of our Natural assets, and there are some area’s within our Region which exhibit the characteristics to be considered as National Parks in the coming years, they include (i) the zone of influence around BenBulbin in North Sligo / North Leitrim, and (ii) the area surrounding Lough Arrow & Lough Key in South Sligo / North Roscommon.

2. Insert New Regional Policy Objective: To support the advancement of the zone of North Sligo / North Leitrim (Ben Bulbin & its hinterland) and the area surrounding, and including Lough Arrow / Lough Key as potential National Parks / National recreation area’s, and to enable collaboration in this regard with stakeholders including NPWS, Local Authorities, Dept. of Culture, Heritage & the Gaeltacht.

3. Amend text on Amenity Attractions with Growth Potential to read: Lough Arrow & Lough Key Forest Park, Co. Roscommon.

Section 5.6. Our Cultural Heritage

Submissions Received: 2019068, 2019025, 2019089, 2019122, 2019139

High Level Summary of Issues

Submissions include a number of suggestions in relation to the Irish Language:

It is suggested that the section of language and Culture should be reviewed, to reflect its importance to the NW of Ireland. The value of language is an economic and cultural asset, and the role of Udaras Na Gaeltachta in Goath Dobhair is significant in this regard. Steps taken in this respect should be considered in the context of the recent published work by AIRO on Gaeltacht communities in Ireland (see http://airo.maynoothuniversity.ie/news/airo-launch-new-socio-demographic-profile-seven-gaeltacht-areas-ireland ).

In respect of RPO 85, it is suggested that where appropriate these facilities should be accessible to entrepreneurs and small enterprises from outside of the cultural sector also. They say that the overall narrative on culture is too narrowly focused - there are other aspects to culture in the Region and to cultural heritage (including those relating to creative industries, craft, digital media, traveller communities). There is no reference to this broader aspect of cultural heritage in the preceding text.

It is submitted that there is no mention of The Western Region Audiovisual Producers Fund (WRAP) http://www.galwayfilmcentre.ie/category/wrap-fund/ nor to the WDC Creative Micro-Loan Fund which is open to sole traders, partnerships, businesses, co-operatives and groups operating in the creative industries sector, and provides loan finance ranging from €5,000 to €25,000. https://www.wdc.ie/wdc-investment-fund/creative-industries-micro-loan-fund/ 

It is suggested that the RSES include a map of geographical reach of Language Planning Strategy for the Gaeltacht areas. It is asked that the wording of RPO 84 be amended so that it seeks to ‘Promote, enhance and protect the linguistic, cultural and heritage value of our Gaeltacht Communities. This shall include development and implementation of Language Plans as the key planning framework and the development of the Gaeltacht brand as a tool to provide competitive advantage.’
A suggestion is made to amend RPO 88, so that it is recommended that they are linked to the Development Plans and Local Area Plans.

**Directors Response**

Based on suggestions of Udaras Na Gaeltachta, the RPO’s in relation to Cultural Heritage should be amended, (i.e. RPO’s 84, 85 & 88). Add an additional Objective, to ensure the incorporations of Language Planning considerations into Local Area Plans within Gaeltacht communities. The Irish Language Act, 2012, set out a 20 year vision for the future well being of the Irish language, and the amendments as suggested will assist and enhance the RSES measures in assisting in the delivery of the goals of the Language Act.

**Director’s Recommendation**

1. Make non material amendment to RPO 84:

   **From:**

   Promote, enhance and protect the linguistic, cultural, and heritage value of our Gaeltacht Communities. Develop the Gaeltacht brand as a tool to provide competitive advantage.

   **To:**

   Promote, enhance and protect the linguistic, cultural and heritage value of our Gaeltacht Communities. This shall include development and implementation of Language Plans as the key planning framework and the development of the Gaeltacht brand as a tool to provide competitive advantage.

2. Make non material amendment to RPO 85:

   **From:**

   Support the provision of low-cost, shared workspaces for cultural sector; Promote the provision of training, education and professional development opportunities for the cultural sector;

   **To:**

   Support the provision of low-cost shared workspaces for the cultural & craft industries, as well as digital media and communications sectors: Promote the provision of training, education and professional development opportunities across all sectors of employment.

3. Make non material amendment to RPO 88:

   **From:**

   Support and assist the formulation and implementation of Irish Language Plans through the lead agency, Údarás na Gaeltachta, across the Gaeltacht areas and within Gaeltacht Service Towns, as defined under the Gaeltacht Act 2012.

   **To:**

   Support and assist the formulation, and implementation of Irish Language Plans through lead agency Udaras na Gaeltachta, across the Gaeltacht and within Gaeltacht Service Towns, as defined.
under the Gaeltacht Act, 2012. All future development Plans and Local Area Plans shall be consistent with the Irish Language Plans, where applicable.

4. Add Irish language Plan Area Map’s – Donegal, Mayo & Galway: Source Udaras Na Gaeltachta

Section 5.7 – Our Built Heritage

Submissions Received: 2019025, 2019096, 2019101, 2019125

High Level Summary of Issues

A number of submissions are broadly supportive of the Draft RSES approach and some additional suggestions include that RPO 92 , which is an important development in protecting our natural assets, should be done in consultation with the Heritage Council.

It is noted that the heading to S5.7 was probably intended to be ‘Our Built Heritage’ but should be ‘Our Built, Architectural and Archaeological Heritage’

Visitor Sites & Visitor Numbers: It is argued that the Table on P.212 should be altered, the OPW sites identified do not provide a balanced picture for Cavan or Monaghan.
Director’s Response

The support for this section of the plan is welcome and whilst a suggestion has been made in respect of specifically referencing the Heritage Council within RPO92, it is important to note that they are specifically identified in the current wording as a stakeholder. Thus there is no benefit in the suggested amendment.

The suggested amendment to the heading of Section 5.7 would be appropriate and the suggestion that the table on P212 does not include sites within Cavan and Monaghan is noted but this is the data made available by the OPW for the entire Northern and Western Region and thus should be retained.

Director’s Recommendation

1. Make non-material change in heading to Section 5.7:
   From:
   Our Natural Heritage
   To:

2. Make non-material deletion Amend: P.212. Review All sites, and review OPW figures, seek update and replace if applicable.

Section 5.8. Our Natural Networks

Submissions Received: 2019068, 2019112, 2019135, 2019022, 2019029, 2019034, 2019014, 2019015, 2019016, 2019011, 2019101, 2019102, 2019094, 2019095, 2019099, 2019122, 2019125, 2019136

High Level Summary of Issues

Western Rail Corridor & Greenways:

Multiple submissions have been received in relation to Greenways, the majority of these relate to the Western Rail Corridor, and a brief breakdown in relation to these submissions can be summarised as follows:

Total Number: 876

- Generally in favour of using the Line as both a Rail Service, and a Greenway / Parallel use: 482
- Generally in favour of reopening Rail Service: 134 in favour of using the line as a Greenway: 257.
Multiple submissions which are advocating a Greenway Facility on the line state disagreement, and concern with the wording of RPO’s 115(a) and (b). In summary the submissions which advocate a Greenway on the WRC state the RSES must be consistent with NPF. They state that the wording of objectives 115 (a), (b) in the Draft are presumptive and premature, and pre-supposes the outcome of the independent review of the future of the WRC. Furthermore, they point out that this review applies only to the Lower portion of the WRC (Athensy – Claremorris), and the wording of the Objective in the Draft ignore this fact, and a separate recognition for a Greenway (Claremorris – Collooney) should therefore be more amenable to usage on the route as a Greenway.

Further submissions can be briefly described as follows:

- Draft RSES does not contain any reference to the Sligo Greenway, Objectives 115 (a) and (b) do not contain any reference to alternative use of the line until such time as a rail service is re-activated on the route. These RPOs should be reworded.
- In November, 2018, Sligo County Council, with approval from Elected Members made an application for funding (National Greenway Strategy) to DTTAS. It is intended the Sligo Greenway would use the existing line from Collooney to Bellahy / Charlestown, on the basis that should the rail line ever come back into use, the rail would take precedence.
- Velorail project has been permitted to operate to North and South of Kiltimagh on Closed Rail line, which would join with WRC. The Group are asking that the final RSES take into account the views of a vast number of locals in Kiltimagh, Kilkeel & Claremorris. The Regional Assembly must acknowledge the fact Mayo County Council have supported an alternative use for the disused line on the VeloRail Route, until such time as an alternative use (rail) is approved by the state. €300k funding has already been secured for the VeloRail, Sligo County Council has made a submission at the end of 2018 for use of the closed line as a Greenway between Charlestown – Collooney.
- A number of submissions highlight the extent of public support for a Greenway in East Mayo & North Galway, and in 2017 1,000 people locally signed a petition to reflect this. The submission includes a document which was apparently submitted to Mayo County Council, as well as Mayo TDs and Minister of Transport Shane Ross.

Multiple submissions from Local authorities and others suggest reference be made to additional projects, which are at various stages of Planning across the Region, and these are now set out:

- Boyne Valley to Lakelands Navan to Kingscourt Greenway.
- Cavan & Leitrim Railway Greenway
- SLNCR (Sligo Leitrim Northern Counties Railway).
- Collooney to Athenry greenway (aka Quiet man Greenway).
- North West Greenway – Derry to Buncrana, via Burnfoot.
- Letterkenny – Burtonport (former Rail-Line)
- Donegal Town – Ballybofey (for Rail-Line).

Further General Comments on Greenways: Greenways’ are generally welcomed as a positive contribution to improving the sustainable transport and ‘green’ tourism infrastructure of Ireland. However, it is important to separate out their primary function and any potential secondary benefits arising from their development. Accordingly, the development of greenways should not be systematically regarded as green infrastructure because their primary function is for the movement of people, albeit, in a more sustainable manner.
It is stated that careful consideration needs to be given at plan-level to how greenways, blueways and peatways can be delivered while conserving biodiversity including the protection of sites and species protected by law. In the first instance consideration should be given to avoiding impacts to biodiversity using standard route selection processes. In the Department’s view the large number of greenway proposals in biodiversity sensitive sites means there is a potential for cumulative impacts at both a Regional and local level including habitat loss and disturbance (e.g. Eurovelo routes 1 and 2).

It is highlighted that the ‘Strategy for the Future Development of National and Regional Greenways’ published in July 2018 by the Department of Transport, Tourism, and Sport also sets out a framework for funding of Greenway projects and this should be stated in Para 1 of P215. In addition it should confirm that the aim of the strategy is to develop national (at least 100k long) and regional (at last 20k but preferably 40k long) trail networks as a unique alternative means for visitors to enjoy rural Ireland as well as protecting and promoting natural assets.

It is suggested that there is an opportunity to identify that the greenways strategy is closely aligned to the National Outdoor Recreation Plan to link into state owned recreation areas including Coillte trails, Bord na Móna peatlands and Waterways Ireland.

It is requested that either RPO97 be reworded or incorporate a new RPO that supports the ‘Outdoor Recreational Plan for Public Lands and Waters in Ireland 2017-2021’ developed by Coillte with Waterways Ireland and others. This publication sets out the case for a new annual budget, not only to maintain existing facilities, but also to establish new world class recreation facilities that will provide not only benefits in terms of health, well-being and quality of life but also support rural development and tourism.

**Director’s Response**

The substantive Policy issue in relation to the WRC is dealt with separately under Sec.6.6. Rail Network.

The narrative under greenways should be modified to reference the National Greenway Strategy, in terms of Greenways of National (100km & longer) & Regional importance (20 - 40km & longer) and this could be inserted after sentence 2 of paragraph 2 in page 215.

In relation to RPO’s 94, 95, 96, 97, 98, the Draft includes these as 4 separate objectives in error, and this should be corrected to read as one objective made up of a number of subsets.

**Director’s Recommendation**

1. Insert non-material change after sentence 2 of paragraph 2 in page 215:
The aim of the ‘Strategy for the Future Development of National and Regional Greenways’ published in July 2018 by the Department of Transport, Tourism, and Sport is to develop national (at least 100k long) and regional (at last 20k but preferably 40k long) trail networks as a unique alternative means for visitors to enjoy rural Ireland as well as protecting and promoting natural assets.

2. Make non-material amendment to the wording of RPO 94 and to amalgamate the wording associated with RPOs 94-98 into one single RPO thus changing:
From:
The Regional Assembly shall collaborate with Local Authorities, Failte Ireland, Waterways Ireland and other relevant stakeholders in developing an integrated network of Greenways across the region’s catchments. To support and enable the development of sustainable Greenway projects across the region, the NWRA will ensure to encourage and promote:

94. The advancement, and growth of national and regional Greenway routes that shall include a number of high capacity flagship routes in this region, and which can be extended and/or link with local Greenways and other cycling and walking infrastructure;

95. Prioritisation of Greenways of scale and appropriate standard that have significant potential to deliver an increase in activity tourism to the region and are regularly used by overseas visitors, domestic visitors and locals thereby contributing to a healthier society through increased physical activity;

96. the development of local businesses, and start ups in the vicinity of Greenway Developments.

97. The development of Greenways in accordance with an agreed code of practice.

98. The Assembly supports the collaboration development of blueways and greenways including feasibility and route selection studies in order to minimise impacts on environmentally sensitive areas.

To:
RPO94: The Regional Assembly shall collaborate with Local Authorities, Failte Ireland, Waterways Ireland and other relevant stakeholders in developing an integrated network of Greenways across the region’s catchments. To support and enable the development of sustainable Greenway projects across the region, the NWRA will ensure to encourage and promote:

(a) The advancement and growth of Greenways through a number of Key National & Regional Greenway Projects which are high capacity, and which can in the medium / long term be extended, and inter-linked across County Boundaries and with Local Greenways, and other cycling / walking infrastructure.
(b) Prioritisation of Greenways of scale and appropriate standard that have significant potential to deliver an increase in activity tourism to the region and are regularly used by overseas visitors, domestic visitors and locals thereby contributing to a healthier society through increased physical activity;
(c) The appropriate development of local businesses, and start ups in the vicinity of Greenway Developments.
(d) The development of Greenways in accordance with an agreed code of practice.
(e) Collaborative development of blueways and greenways including feasibility and route selection studies in order to minimise impacts on environmentally sensitive areas.

3. Make non-material amendment to listing of projects on P.215 to include:
   o SLNCR (Sligo Leitrim Northern Counties Railway).
   o Boyne Valley to Lakelands, Navan, to Kingscourt, Co. Cavan
   o Collooney to Athenry greenway (aka Quiet man Greenway).
   o Letterkenny – Burtonport (primarily former Rail-Line)
   o Donegal Town – Ballybofey (former Rail-Line).
   o Dublin - Galway Greenway
4. Insert new RPO as a material amendment:
   The Assembly supports the further development of Greenways as part of the Outdoor Recreational Plan for Public Lands and Waters in Ireland 2017-2021’, as part of an overall improvement of facilities to enhance health & wellbeing across society.

5. Make non-material inclusion of a further Case Study at P.216 to include the National Mountain Bike Centre @ Coollaney, Co. Sligo (subject to availability of space) as follows:

   National Mountain Biking Centre at Coollaney is currently under construction. When complete it is expected to attract 50,000 visitors annually. 30k of trails by Spring of 2019. If the MB Centre is used a trailhead for the Sligo Greenway, this could benefit all users, as there will be facilities, including showers etc. at Coollaney MB Centre.

Section 5.9 – Forestry & Woodland

Submissions Received: 2019068, 2019041, 2019009, 2019039, 2019096, 2019103, 2019140, 2019136

High Level Summary of Issues

There are a number of submissions on forestry, which are diametrically opposed. Several including Cavan & Leitrim County Councils raise grave concern in relation to the ongoing increase in afforestation in parts of rural Ireland, which is having significant negative impacts upon communities, and farming. Other submissions highlight the economic benefit of the industry, and the numbers employed therein, as forestry continues to expand.

Comments of Concern: Leitrim County Council say Section 5.9. is seriously deficient in setting out a vision for how forestry will be dealt with in the coming decades. Forestry as promoted by Government is vast mono-crop (generally Sitka Spruce). This is largely in the hands of investors, and semi state companies, and there is no gain for communities. Where referencing the extent of planting at present, no source is provided for same. Leitrim and North Roscommon are well over the 10.9% quoted. There is no argument to be made in terms of bio-diversity, spruce deserts are being created, and the statement that forests have value as carbon sponges / sinks is without basis. Setting up a Regional Forum is questionable, forestry should be brought under the control of Local Government and it recommends that RPO 103 be amended to reflect same.

Leitrim is under significant threat from over-afforestation, and the balance in forestry in the NPF (NPO 23) advocates cannot be satisfied under the current legislation framework. RPO103 is therefore not adequate to address the very serious negative social consequences which afforestation is having on rural area’s in County Leitrim. Leitrim does have advantages on Bio-Fuel / Biomass, and some spatial recognition for the County would be welcome in this regard. Ultimately,
Local Authorities, and Planning Authorities should have the decision making powers in relation to afforestation licencing.

Comments of Support: The RSES Draft doesn’t expand enough in terms of forestry or potential future development. The Sector is a significant employer, with 4,200 in this Region alone. The data on forest cover may not be correct, Forest Ind. Ireland (FII) gives data on forest cover by County.

Western Foresters Co-op advises farmers on Forestry and has been doing so for over 30 years. In summary, the Co-op believe forestry can complement farming, and is not advocating that it replace farming.

- Forestry is an important indigenous industry, and can keep farmers on the land.
- There are 21,000 foresters in the Country, and the majority of these are farmers.
- It is anticipated the roundwood output of forestry will double by 2035.
- Forestry absorbs 2.7m tonnes of Carbon, and offsets 20% of carbon produced by the agricultural industry in Ireland.

Coillte recognises the Assembly’s initiative in setting up a regional fora for sustainable afforestation across the Region and the motivation underpinning it (objective 103). It states however that it is imperative to point out that forestry, and afforestation in Ireland is fully regulated by the Forest Service, Department of Agriculture, Food and the Marine. The Forest Service enact a suite of environmental guidelines which regulate licenced activities including afforestation. There is a risk, that the forum could be duplicating the work of the Regulator in this instance and it is imperative that this Framework does not inhibit or interfere with the statutory consenting process(es) and standard practices that govern all forestry activities in Ireland. In addition, there must be balanced representation within any proposed Fora and this must include Coillte as Ireland’s State owned national forestry organisation.

Director’s Response

Whilst the criticism of the section relating to forestry is noted, the Draft RSES has not put forward or suggested measures which are effectively outside of its scope, and ultra vires. It is not being proposed that the regulation of forestry be brought under the remit of Local Authorities as this is not within the remit of the Assembly but it may be a matter that could be discussed by the fora and will ultimately be a matter for Government. The framework for the statutory regulation of forestry, as well as its future direction is under the charge of the Department of Agriculture, Food & the Marine (DFM). The Objectives in relation to forestry are intended to chart a path in terms of the future of forestry in the region, and to conduct this through engagement with all stakeholder across the spectrum. The statistics in the introductory para. Of Section 5.9 are DFM and relate to 2018.

Director’s Recommendation

No changes are proposed, either to the narrative or to Regional Planning Objectives 101, 102 & 103.
Section 6 – Connectivity – Connected Regions

General Submissions to Chapter 6

Submissions Received: 2019077, 2019112, 2019128, 2019068, 2019112, 2019144, 2019063, 2019125,

High Level Summary of Issues

There have been a number of submissions made that have not been directed an any specific section. These include the need for a regional conversation on the future of e-mobility in this region, and the provision of the infrastructure needed to enable this shift away from the traditional car and this is not only about cars – but also public transport, trucks/vans, last mile delivery, etc. It is suggested that commuting by car needs to be reduced from 65% to 45% and that the integration of housing and public transport will go some way in enabling this shift.

In relation to connectivity it is suggested that consideration should be given to the inclusion of a specific RPO addressing environmental requirements including in relation to biodiversity in the provision of roads and other transport infrastructure. Furthermore, submissions have been received that include policy suggestions that would be directed towards enabling greater access to the open countryside.

It is also stated that that the prioritisation and phasing of investment in infrastructure needs to be clearly stated. DBEI has encouraged that the RSES decisively and strongly emphasise those projects that are central to the regions ambitions and to articulate their importance to realising regional and national ambition for the region. They highlight that attracting investment and employment of the scale envisaged (both indigenous and FDI) to the region will rely on the quality of key routes, accessibility and supporting infrastructure and that the RSES can identify clear priorities in this regard.

Director’s Response

The suggestion that there needs to be a modal shift and also in tandem a shift in the decarbonisation of vehicles is one that is well made and is a cross cutting issue for the RSES. This region has historically had a weak urban structure with accessibility to public transport more limited than in the other two regions. It is necessary to develop a stronger urban structure, increase the accessibility of integrated public transport to citizens across the region and require investment to be provided in infrastructure necessary to support the decarbonisation of vehicles across the region. The RSES does support these actions as a cross-cutting measure.
The suggested inclusion of a specific RPO addressing environmental requirements including in relation to biodiversity in the provision of roads and other transport infrastructure is reflective of the importance that environmental considerations should be given. However, environmental considerations, including biodiversity, is applicable to all aspects of the RSES and for this reason high level objectives have been incorporated into the RSES.

Director’s Recommendation
No specific recommendations arise as these matters are considered appropriately within the Draft RSES and recommendations contained within the Director’s Report shall not negate same.

Section 6.1
Submissions Received: N/A

Director’s Response: N/A

Director’s Recommendation
No changes

Section 6.2 Transport
Submissions Received: 2019031, 2019033, 2019040, 2019090, 2019140, 2019024, 2019122, 2019141, 2019066, 2019145

High Level Summary of Issues
There is generally broad support across the submissions but the contention that there are significant gaps in the quality of the region’s transport network has not went unchallenged, with DTTAS asking if there is evidence for this statement. DTTAS also suggest a rewording of the text on Sustainable Travel. A submission questions the wording of a few of the Key Challenges that are identified, stating that there would be benefit from being more specific on the type of freight that has the capacity challenge and where our challenges are in terms of the accesses needed to grow visitors to the region.

It is suggested by TII that there is insufficient recognition given to the role of our national road network as an economic enabler and that the RSES should ensure that the improvement, maintenance and the capacity of national roads are protected. Furthermore, it should provide for safeguarding these strategic links into urban centres identified as key economic drivers in the region. Meanwhile the NTA commend the draft and seek amendments to the wording of key principles and suggest that text be amended to also clarify how they shall be achieved.

Eirgrid has noted that an infographic within this section refers to the region as being poorly provided in terms of Grid Infrastructure. Eirgrid discount this and advise that the nominal voltage value of the
electrical network in the region, or lack of higher voltages, should not be considered an indicator of a poor network particularly where the network is safe, secure and reliable. They state that the network is successfully serving both the demand and generation in the region and can continue to do so.

Director’s Response

The NWRA has long provided evidence in respect of the gaps in the quality of the transport network and are happy to engage further with DTTAS in this regard and is readily visible to anyone that seeks to traverse this region. Notwithstanding, DTTAS, TII and NTA have all continued to engage positively in contributing to the preparation of the RSES and they have all commended the NWRA’s draft. The amendments suggested by them to this section are not material amendments but shall positively benefit the plan and should be broadly incorporated whilst also seeking out opportunities to make the contextual text more concise in a non-material way.

Director’s Recommendation

1. Make non-material amendment to section 6.2 to condense wording and incorporate the following:

   (i) Confirm that international connectivity via port and airport locations in the Eastern and Midland and Southern Regions will also be critical to regional development in the Northern and Western Region and this should be confirmed at P222 where it refers to TEN-T routes within the region.

   (ii) Delete reference to the Electricity Network within infographic.

   (iii) Under heading ‘Sustainable Travel’ state as follows:

       The close integration of transport spatial and economic planning provides the opportunity to deliver improved sustainable transport options for people and reduce dependency on the private car. This includes promoting walking, cycling, public transport, car-sharing and reducing travel time through the use of technology or linked trips. Sustainable travel can have significant benefits for individuals, workplaces and education facilities in terms of health and wellbeing, costs and time associated with travel. It has the potential to reduce congestion and emissions and to exploit investment in sustainable transport.

   (iv) Under Heading ‘National Road Network’ state as follows:

       The national road network is a critical enabler in facilitating an island wide sustainable national transport system. Such high value assets and amenities need to be protected and their use enhanced for the Region and also the country as a whole. This is necessary to support economic and community interaction across a range of sectors in the region and beyond, including providing regional connectivity, addressing peripherality, empowering rural communities and facilitating access to critical services such as education, healthcare, employment and enterprise. Improving and maintaining the assets of all national roads is critical and it is important that the efficiency, capacity and safety of the existing national road network within the region is maintained, including the requirement to safeguard the strategic links into urban centres identified as key economic drivers in the region.
(v) To ensure that the prioritisation of transport development is coordinated in a sustainable and controlled manner, the following broadly based strategic principles be included in Chapter 6 to replace those stated in Page 224:

- support improved strategic and local connectivity;
- expand attractive public transport and other alternatives to car transport;
- recognise the role of the car and cater appropriately for it;
- reduce congestion; and cater for the demands associated with longer term population and employment growth, in a sustainable manner

These can be achieved through:

a. Supporting the achievement of 'compact, smart growth' through the achievement of 'mutual consistency' between land use and transport planning/investment/service provision.

b. Promotion of higher development densities in appropriate locations with an associated consideration being given to reduced constraints on building height;

c. Strengthening public transport, walking and cycling accessibility/connectivity within Galway City and environs;

d. Strengthening public transport connectivity between Galway City, Dublin and the other regional cities with improved services and reliable journey times;

e. Strengthening inter-regional connectivity, through the improvement of inter-urban road and rail connectivity, with a particular emphasis on improved connectivity between the largest urban centres and access to ports and airports, for the movement of both people and goods;

f. Protecting the capacity of inter-urban road connectivity within and around the largest cities, ports and airports, through effective traffic management and transport demand management;

g. Strengthening public transport connectivity between the Assembly Area's city and large towns, and between the large towns, with improved services and reliable journey times;

h. Providing public transport infrastructure and services to meet the needs of smaller towns, villages and rural areas; and

i. Developing a comprehensive network of safe cycling routes in the three cities / associated metropolitan areas, and providing similar facilities in other towns and villages, where appropriate.

**Section 6.3 Transport Investment Priorities**

**Submissions Received:** 2019042, 2019052, 2019066, 2019122

**High Level Summary of Issues**

It is suggested that for local trip making within both urban and rural areas, the manner in which transport infrastructure is designed and managed can have a very significant bearing on modal choice and accessibility to services and facilities. In doing so, it is suggested that the key challenge, in transport investment, is to achieve the most appropriate balance between how car and non-car modes are provided for. It is stated that among the modes most amenable to local trip making but most vulnerable to lack of specific design consideration, are walking and cycling. For this reason, it is stated that the RSES should include a specific section which sets out a clear policy framework for the provision of pedestrian and cycle infrastructure, which addresses the need to ensure an appropriate
level of safety, comfort and convenience for users, at all levels of mobility. This section should make reference to published design manuals, included (Design Manual for Urban Roads and Streets (DMURS) and the NTA Cycle Manual. It is also noted that along with the various public transport providers, there is a significant role for private operators, especially bus operators and this should be acknowledged.

**Director’s Response**

The RSES already places significant emphasis upon encouraging a travel mode shift from private vehicular use towards sustainable travel modes of walking, cycling and use of public transport. Notwithstanding, it is agreed that a new sub-heading should be inserted to reference walking and cycling, utilising the existing suggestions that are within the Draft. The “cycling offer” within the region must be improved to encourage more people to cycle. And the suggestion to incorporate reference to published design manuals is considered appropriate. It is considered that sections 6.4 to 6.9 would benefit from being reorganised as sub-headings to this overall section and renumbered. The new section on walking and cycling can be incorporated within same.

**Director’s Recommendation**

1. Make non-material change by re-organising section 6.4-6.9 inclusive as sub-headings to ‘Section 6.3 Transport Investment Priorities’
2. Insert new sub-heading ‘Walking and Cycling’ and include the following text:

   Facilitating modal shift to more sustainable transport options, including walking and cycling is a key element in promoting healthier lifestyles, better traffic management, assists in mitigating climate change and provides for enhanced economic development opportunities, especially within the context of Greenways and Tourism development. The expansion of shared-bike schemes can also make a positive contribution to sustainable transport and mobility, particularly within the Galway Metropolitan Area, Regional Growth Centres and Key Towns.

3. Insert as non-material amendment the following RPO:

   The walking and cycling offer within the region shall be improved to encourage more people to walk and cycle, through

   (a) Preparation and implementation of Local Transport Plans for Galway Metropolitan Area, Regional Growth Centres and Key Towns, which shall encourage a travel mode shift from private vehicular use towards sustainable travel modes of walking, cycling and use of public transport.

   (b) Safe walking and cycle infrastructure shall be provided in urban and rural areas, the design shall be informed by published design manuals, included the Design Manual for Urban Roads and Streets (DMURS) and the NTA Cycle Manual.

   (c) Development of a network of Greenways.

**Section 6.4 International Connectivity**

*Submissions Received: 2019018, 2019058, 2019090, 2019024, 2019122, 2019085*
**High Level Summary of Issues**

Submissions have recognised the importance of international connectivity and the role that airports and sea ports both within and outside the region. Reference is made to Galway Port and that it’s future development will be under the more appropriate regional control of Galway City Council. In addition, it is considered that there are potentially a number of other Ports that should be upgraded as a counter balance due to Brexit / prominence of East Coast Tier 1 Ports with all coastal counties having major potential to be harnessed from the marine economy.

A submission on behalf of Foyle Port states that it is a genuine cross border entity with infrastructure and operations on both sides of the border. It says that it is governed by legislation which pre-dates partition on the island of Ireland and is entirely independent of Government. It further states that it is in a strategic location, and is at the heart of the NWCR, is a key economic driver for the region, handling €1bn worth of goods per annum. The port has a number of primary development objectives, including, expanding bulk cargo trade, expanding the number of leisure / marine tourism visits into Greencastle and beyond, and expanding the port lands at Lisahally (Derry), where the Port owns a significant landbank, which is ideally located for enterprise and employment opportunities. It is suggested that this section should acknowledge the wider economic significance of Foyle Port to the region, and suggest additional text be added confirming this and also that Greencastle Harbour falls within their jurisdiction.

Submissions have also been received in respect of the airport assets within our region but also those outside the region. It is agreed that support should be given to the expansion of IWAK, and to substantial Zoning of land @SDZ but also notes that Shannon Airport is the main transatlantic gateway for the entire west coast and is a critical asset that should be recognised in the RSES, not just for the Southern Region but for the West of Ireland. In support of this it is stated that an examination of the travel patterns of inbound visitors through Shannon shows that 29% of tourists visit Galway. It is also advocated that the RSES should advocate for revised National Ports and Aviation policies and references that a recent paper by the Irish Exporters Association also highlights concerns about the continuing dominance of Dublin (Port and Airport) and the need for alternatives for the exporters in the West.

**Director’s Response**

It is welcome that the importance of international connectivity is supported through the submissions. The importance of IWAK to the region is already identified and the SDZ is also specifically referenced earlier within the Director’s Report where it is recommended that text changes are made to it under section 3.7.9.

The Draft RSES has not referenced Foyle Port nor its role in the context of the North West City Region and it is considered that the RSES would benefit from providing context to this Port and its role within this part of the north west region. The suggestion that text be amended in respect of Greencastle, to refer to it as a Harbour, which falls within the jurisdiction of Foyle Port, the Competent Harbour and Pilotage Authority for all of Lough Foyle is noted but it is not considered
that such a statement would benefit the plan and it is acknowledged that the jurisdiction of Lough Foyle has been an issue that has been contested for some time.

**Director’s Recommendation**

1. Make a non-material amendment by numbering this section 6.3.1
2. Make a non-material amendment to text within the section to incorporate reference to Foyle Port, which lies at the heart of the North West City Region, as a port of regional significance for the North West of Ireland, however it operates independently of Government and is not addressed by the National Ports Policy. Foyle Port is by far the largest cargo port serving the region, handling in excess of €1 billion worth of commodities annually. It also serves the rapidly expanding international cruise sector, primarily through Greencastle in Co. Donegal and Lisahally in Co. Derry, and operates a marina near Derry city centre which provides a hub for water sports activity within the North West City Region as well as a regional base for independent marine tourism.

**Section 6.5 Road Network**

**Submissions Received:** 2019076, 2019012, 2019108, 2019068, 2019117, 2019135, 2019040, 2019067, 2019101, 2019009, 2019090, 2019093, 2019085, 2019024, 2019133, 2019141, 2019144, 2019122, 2019087.

**High Level Summary of Issues**

There are a number of submissions that support the listing of road projects and others ask that a variety of additional National Primary, National Secondary and Regional road projects be included. However, on the other hand TII notes that all new transport projects must be appraised in accordance with the Public Spending Code and the Common Appraisal Framework for Transport Projects and Programmes before they can be approved, whether or not they are included in the NDP. It states, ‘where the RSES lists aspirations beyond the NDP, it should be noted that the scope for such developments between now and 2027 will be constrained.’

The additional suggested routes include:

- N3 North of Kells to Enniskillen, via Cavan and the A509 in Fermanagh
- N54 (NS) Cavan to Monaghan Town
- N55 (NS) Cavan to Athlone
- A29 (NI)
- N87 (NS) Belturbet to Ballyconnell to Swanlinbar
- R280 Bundoran to Carrick-on-Shannon
- R336 Connects the N59 to the N6 and N83
- N26 (NP) and N58 (NS) linking Ballina to N5
- N60 linking Roscommon to Castlebar,
- N84 (NS) linking Galway City with Castlebar

TII also recommends changes to wording of RPO 108 to include reference to maintaining the strategic capacity and safety of the existing national road network and to reference that the objective is bringing forward schemes identified in the NDP to planning/design and construction. TII also recommends changes to RPO 109 so that it confirms that named schemes identified in the NDP are to be brought through pre-appraisal and early planning but asks to delete the timeline.
'within the lifetime of the NPF’. It includes the N4 Carrick-on-shannon to Dromod but deletes the N15 Sligo to Bundoran and the N13 Manorcunningham to Bridgend to Derry. It also amends the wording to one of schemes so that it is two schemes, namely N13/N14/N56 Letterkenny Bypass and Dual Carriageway to Manorcunningham and the N14 Manorcunningham to Lifford.

In respect of RPO 110 it is noted by TII that Regional Policy Objective 110 of the Draft RSES includes schemes impacting upon national roads that are in addition to NDP investment priorities 2018-2027. They say that implementation of all national road schemes is subject to budgetary constraints and is subject to prioritisation and adequacy of the funding resource available. They say that while proposals should be developed complementary to safeguarding the strategic function of the national road network, proposals impacting on the national road network should be developed in consultation with and subject to the agreement of TII. It recommends that RPO 110 be amended as schemes being ‘pursued by the Regional Assembly’.

TII also questions the legal or regulatory requirement for confirmation of consistency with the RSES to be obtained from the Regional Assembly for road projects in advance of development consent as referenced in section6.5 of the Draft RSES.

**Director’s Response**

The recommendations of TII are acknowledged and in general should be incorporated into the text so as to ensure that those major schemes are appropriately named in the interests of ensuring consistency with investment priorities included in the National Development Plan, 2018 - 2027, and major national road scheme planning activity currently being undertaken by local authorities in the region. TII has recommended that the N15 Sligo to Bundoran and the N13 Manorcunningham to Bridgend to Derry be omitted from RPO 109. This arises as they are not committed to within the NDP but it should be noted that they are part of the European Unions (EU) TEN-T Comprehensive network and have significant deficiencies in capacity and safety issues, which in my view merits their inclusion under RPO 110 as a non-material change.

It is accepted that the national road network is a critical enabler in facilitating an island wide sustainable national transport system and concur with TII that these high value assets and amenities need to be protected and their use enhanced for the Region and also the country as a whole. It was intended that this would be the case under current Guidelines but I concur with TII that the RSES would benefit from this being explicitly stated within the RSES.

The query in respect of where the legal or regulatory requirement for confirmation of consistency with the RSES by the NWRA is noted and whilst it is considered a reasonable proposition that the Regional Assembly would be prepared to certify same, it is noted that TII do not support this. Accordingly, it is proposed that this be deleted from the explanatory text.

It is noted that a significant number of additional road schemes are put forward for mention and I do not dispute that they all have merit in being considered. However, the comments of TII is noted and the Assembly need to take difficult choices in putting forward those schemes that are priority in delivery of the overall strategy of the RSES. With this in mind it is considered that those National Primary and Secondary roads that link the urban places of regional scale should be included under RPO 110. This shall mean that the N3 North of Kells to Enniskillen, via Cavan and the A509 in Fermanagh; N54 (NS) Cavan to Monaghan Town; N55 (NS) Cavan to Athlone; N26 and N58 (NS) linking Ballina to N5 should be included.
Director’s Recommendation

1. Make non-material change to explanatory text acknowledging that national roads play a key role within Ireland’s overall transport system and in the country’s economic, social and physical development. State that the primary purpose of the national road network is to provide strategic transport links between the main centres of population and employment, including key international gateways such as the main ports and airports, and to provide access between all regions. It is a critical enabler in facilitating an island wide sustainable national transport system. Such high value assets and amenities need to be protected and their use enhanced for the Region and also the country as a whole. This is to support economic and community interaction across a range of sectors in the region and beyond including providing regional connectivity, addressing peripherality, empowering rural communities and facilitating lifeline links to critical services such as education, healthcare, employment and enterprise. Improving and maintaining the assets of all national roads is critical and a key objective of the RSES.

2. Insert new RPO as a material alteration as follows:
   The capacity and safety of the Region's strategic land transport networks will be managed and enhanced, including through the management of travel demand in order to ensure their optimal use, thus giving effect to NPF National Strategic Outcome No. 2 and maintaining the strategic capacity and safety of the national roads network including planning for future capacity enhancements.

3. Make non-material amendment to RPO 108:
   From:
   The following projects shall be delivered to an appropriate level of service in the short term and in any case by 2027 having regard to the standard in the NPF of an average inter-urban speed of 90KPH
   • N6 Galway City Ring Road
   • N4 Collooney to Castlebaldwin
   • N5 Ballaghaderreen to Scramogue and Turlough to Westport
   • A5 Road Development
   • N59 Moycullen Bypass
   • N56 Dungloe to Glenties and Mountcharles to Inver

   To:
   In accordance with National Development Plan investment commitments to bring the following schemes through planning/design/construction, the following projects shall be delivered to an appropriate level of service in the short term and in any case by 2027 having regard to the standard in the NPF of an average inter-urban speed of 90KPH:
   • N6 Galway City Ring Road
   • N4 Collooney to Castlebaldwin
   • N5 Ballaghaderreen to Scramogue and Turlough to Westport
   • A5 Road Development
   • N59 Moycullen Bypass
   • N56 Dungloe to Glenties and Mountcharles to Inver

4. Make non-material amendment to RPO 109
   From:
   The following projects shall be progressed through pre-appraisal and early planning in the short term and shall thereafter proceed to construction and be delivered to an appropriate level of service within the lifetime of the RSES:
• N2 Clontibret to the Border connecting to the A5
• N2 Ardee to south of Castleblaney
• N3 Virginia Bypass
• N13 Ballybofey Stranorlar Bypass
• N13/N14/N56 Letterkenny Bypass and Dual Carriageway to Lifford
• N17 from N4 interchange to N5 interchange
• N15 Sligo to the Bundoran Bypass
• N13 Manorcunningham to Bridgend/Derry

To:
In accordance with National Development Plan investment commitments to progress the
following, schemes through pre-appraisal and early planning, the following projects shall be
progressed through pre-appraisal and early planning in the short term and shall thereafter
proceed to construction and be delivered to an appropriate level of service within the
lifetime of the RSES:

• N2 Clontibret to the Border connecting to the A5
• N2 Ardee to south of Castleblaney
• N3 Virginia Bypass
• N13 Ballybofey Stranorlar Bypass
• N13/N14/N56 Letterkenny Bypass and Dual Carriageway to Manorcunningham
• N14 Manorcunningham to Lifford
• N17 Knock to Collooney
• N4 Carrick on Shannon to Dromod

5. Make material amendment to RP110:
From:
The delivery of the following projects shall be pursued through pre-appraisal, early planning
and thereafter to construction as priority projects to be delivered to an appropriate level of
service in the medium term:
• N59 enhancement (N59 Westport to Mulranny; N59 Ballina to Crossmolina; N59
  Ballina Relief Road; N59 Oughterard By-pass; N59 Clifden to Oughterard)
• N61 Athlone to Boyle improvement
• N63 Roscommon to Longford improvement
• N56 Inver to Killybegs
• N15 Stranorlar to Lifford
• N13 Stranorlar to Lifford

To:
The delivery of the following projects shall be pursued, in consultation with and subject to
the agreement of TII, through pre-appraisal, early planning and to construction as priority
projects to be delivered to an appropriate level of service in the medium term.

• N15 Sligo to Bundoran
• N16 Sligo to Blacklion
• N13 Manorcunningham to Bridgend/Derry
• N59 enhancement
• N61 Athlone to Boyle improvement
• N63 Roscommon to Longford improvement
• N56 Inver to Killybegs
• N15 Stranorlar to Lifford
Section 6.6 Rail Network

Submissions Received: 2019008, 2019017, 2019085, 2019068, 2019117, 2019105, 2019023, 2019029, 2019034, 2019021, 2019031, 2019035, 2019040, 2019053, 2019072, 2019120, 2019090, 2019093, 2019114, 2019118, 2019129, 2019024, 2019027, 2019055, 2019079, 2019122, 2019147 and 2019153 to 2020055.

High Level Summary of Issues

This section of the RSES deals with rail connectivity and the potential that it presents the region, and includes objectives that:

1. Seek the completion of the review of the Western Rail Corridor project as a priority for passenger and freight transport (RPO 113);
2. Progress the Athenry-Tuam-Claremorris-Sligo rail through pre-appraisal and early planning and thereafter to deliver it (RPO 115(a) and (b));
3. Promote upgrade of Athlone-Athenry-Galway rail line, including dual tracks and increase stops between Athenry and Galway City (RPO 114);
4. Support Smarter travel (RPO 116);
5. Enhance Sligo-Dublin line (RPO 117);
6. Investigate feasibility of extending network from Letterkenny/Derry to both Sligo and Dublin (RPO 118);
7. Support strategy for electrification of rail (RPO 119).

RPO's 113, 115(a) and (b):

This is the section of the plan that has received the most significant volume of submissions and the majority of them relate to the Western Rail Corridor. The Department of Transport, Tourism and Sport (DTTAS) reaffirms that the National Development Plan 2018-2027 states that the funding priority for the inter-urban rail network is – ‘to protect the investment already made in our national railway system by funding maintenance and safety projects needed to maintain safety and service levels in railway operations.’ It acknowledges that there are a number of references in the draft RSES to the review of the Western Rail Corridor and advise that in line with a commitment in the Programme for Government and the NDP, Irish Rail has commenced a procurement process to engage external expertise to assist with a financial and economic appraisal of proposals to extend the WRC from Athenry to Claremorris. They say that this shall involve a broad consultation with key stakeholders and thereafter will be followed by an independent review of the robustness of the appraisal ensuring that all submissions received from the stakeholder consultation have been appropriately considered. The Minister will then revert to Government with the outcome of the work, seeking a decision on the future of the proposal for extension of the Western Rail Corridor. They also suggest that the text be amended to reflect ‘If the review concludes that the corridor should be reopened, and if that is approved by Government, the project should be prioritised during
this plan period.’ It then goes on to recommend that RPO 115 (a) and (b) be omitted and that RPO 113 be retained.

In excess of 900 submissions have been received that make reference to this section of the plan and almost 880 of them are related solely to the utilisation of the Western Rail Corridor. 15% of these submissions stated that they favoured RPO 115(a) and (b) to reopen the rail line, whilst almost 30% had a preference to use the old railway line as a greenway and 55% supported the reopening of the railway but also suggested that it be used as a greenway facility as an interim measure. Those that advocate a Greeenway state that the RSES must be consistent with the NPF. They state that the wording of objectives 115 (a), (b) in the Draft are presumptive and premature, and pre-supposes the outcome of the independent review of the future of the WRC. Furthermore, they point out that this review applies only to the Lower portion of the WRC (Athenry – Claremorris), and the wording of the Objective in the Draft ignores this fact, and a separate recognition for a Greenway (Claremorris – Collooney) should therefore be more amenable to usage on the route as a Greenway. Those that advocate the rail being opened do so on the basis that it shall provide for modal shift and the improved connectivity will bring with it social, economic and environmental benefits for the region.

It should further be noted that this issue is related to submissions received in respect of the development of Greenways (See Section ). It includes submissions that can be briefly described as follows:

- Draft RSES does not contain any reference to the Sligo Greenway, Objectives 115 (a) and (b) do not contain any reference to alternative use of the line until such time as a rail service is re-activated on the route. These RPOs should be reworded.
- In November, 2018, Sligo County Council, with approval from Elected Members made an application for funding (National Greenway Strategy) to DTTAS. It is intended the Sligo Greenway would use the existing line from Collooney to Bellahy / Charlestown, on the basis that should the rail line ever come back into use, the rail would take precedence.
- Velorail project has been permitted to operate to North and South of Kiltimagh on Closed Rail line, which would join with WRC. The Group are asking that the final RSES take into account the views of a vast number of locals in Kiltimagh, Kilkelly & Claremorris. The Regional Assembly must acknowledge the fact Mayo County Council have supported an alternative use for the disused line on the Velorail Route, until such time as an alternative use (rail) is approved by the state. €300k funding has already been secured for the Velorail, Sligo County Council has made a submission at the end of 2018 for use of the closed line as a Greenway between Charlestown – Collooney.
- A number of submissions highlight the extent of public support for a Greenway in East Mayo & North Galway, and in 2017 1,000 people locally signed a petition to reflect this. The submission includes a document which was apparently submitted to Mayo County Council, as well as Mayo TDs and Minister of Transport Shane Ross.
- Athenry to Collooney Rail should be available for variety of uses, (including short or medium term uses where agreement has been reached with Irish rail. This may enable uses such as an energy corridor for gas and electricity, as a route for a broadband trunk line, a greenway.

**RPOs 114 & 116-119**

DTTAS has advised that the NDP states that the Dublin-Galway rail line will “be subject to an examination to move to higher speeds leading to improved connectivity to regional cities through improved rail journey times.” They also advise that it is important that references to heavy rail within the RSES reflect and are consistent with the NDP and that there are currently no plans for electrification of the inter-urban rail network or to extend the rail network to the North West City.
Athenry to Collooney Rail should be available for variety of uses, (including short or medium term uses where agreement has been reached with Irish rail. This may enable uses such as an energy corridor for gas and electricity, as a route for a broadband trunk line, a greenway. 

- Support RPO 115 (a) and 115 (b)
- There may be potential for further expansion of commuting services along the existing intercity lines, serving Galway, Athlone, Sligo and other centres given their planned population and employment growth.
- RPO 115 is contingent on the results of the Review referred to in RPO 113. 
- RPO 117 - Capacity and service level improvements are needed across all lines operational in the Region; Galway-Dublin, Sligo–Dublin, Ballina/Westport/ Castlebar–Dublin.
- RPO118 – clarification on where this extension is to – Letterkenny or Derry or both.

**Director’s Response**

The RSES has the responsibility of supporting the implementation of the National Planning Framework (NPF) and the economic policies and objectives of Government by providing a long term strategic planning and economic framework for the development of the region. This RSES has to be consistent with the NPF and the economic policies or objectives of the Government. The consideration of RPOs should be viewed across the RSES in this context. The submissions from the public are suggesting that rail services should be extended into the region and also that Greenways should be developed within the region. This is a framework of regional scale and the development of both networks should be an objective as is the case within the current regional policy, as enshrined within the Regional Planning Guidelines for the West 2010-2022. It has a number of objectives that support the complete reopening of the Western Rail Corridor subject to relevant environmental assessment including Habitats Directive Assessment, where appropriate. It also has policies that seek to develop walking and cycling routes.

It is stated in some submissions that RPO115(a) and 115(b) should be omitted because there is tension between it and the current policy of Government. It is confirmed by DTTAS that in line with a commitment in the Programme for Government and the NDP, Irish Rail has commenced a procurement process to engage external expertise to assist with a financial and economic appraisal of proposals to extend the WRC from Athlony to Claremorris. DTTAS advise that that there is no provision for investment in this stretch of the corridor under the NDP between now and 2027. It is apparent that in the short term (up to 2026) there is no funding available for the Athenry to Claremorris but there is a potential to be funding thereafter, depending upon the outcome of the review. In the case of the Claremorris-Colooney rail track the position is somewhat different and the consideration of the RSES should reflect that.

On the substantive question of the inclusion of the objectives I would consider that on balance there is justification in the RSES having the objectives 113 and 115(a) and 115(b) retained so that the long term vision is to deliver the Athenry-Tuam-Claremorris-Sligo rail line and that the Claremorris-Sligo stretch of rail corridor should be supported as a Greenway as its potential reopening as a greenway would not be precluded in the short/medium term, thus realising its potential for alternative appropriate uses in the interim. I acknowledge that it is appropriate to confirm that...
It is noted that DTTAS recommend RPO 116 be amended to refer to ‘Sustainable Travel’ rather than ‘Smarter Travel’ and I accept that recommendation. It is also noted that DTTAS has highlighted that there are no plans to investigate the feasibility of extending the rail network to the Northwest city region from Sligo or Dublin and that there are currently no plans for electrification of the inter-urban rail network. Similarly, it is noted that they say there is no provision for investment under the NDP between now and 2027 for the Athlone-Athenry-Galway rail line. Whilst I accept the account that has been given under the current NDP this RSES is to 2031 and it is considered that the ambitions as stated should be retained.

**Director’s Recommendation**

1. Make non-material amendment to paragraph on P 233, to state that ‘If the review concludes that the corridor should be reopened, and if that is approved by Government, the project should be prioritised during this plan period.’
2. Make material change by inserting a new Objective to read as follows: Support alternative appropriate uses of disused railway corridors, including as Greenways, where it does not prevent its future use for railway transport.

**Section 6.7 Bus Network**

**Submissions Received:** 2019014, 2019015, 2019016, 2019063, 2019064, 2019024, 2019122

**High Level Summary of Issues**

There is broad support for this section of the RSES with strong support for refuelling and recharging infrastructure and the use of CNI (Compressed Natural Gas) across public transport is advocated. It is suggested that it may be more appropriate to highlight bus services which are currently under-developed and under-serviced. Bus routes which are currently unattractive to private operators should be a key investment priority under the RSES. Given current pressures on public bus services i.e. Bus Eireann, which are by far the most widely dispersed in the Region, public bus services should be a priority under the RSES. It is further queried who would undertake the review bus services as proposed under RPO 123 and whether it would cover public, private and community provided bus services? Would bus services for specific purposes e.g. school buses, HSE buses, be included? It has been stated that any review of the Rural Transport Programme is the responsibility of the Department of Transport, Tourism and Sport and the National Transport Authority but no objection is stated to the inclusion of RPO123.

It is suggested that reference should be made to the ongoing work on transitioning buses to alternative fuels.

**Director’s Response**

The positive feedback in respect of this section is welcome and the implementation of the review of the Rural Transport programme will be led by DTTAS and the NTA. The suggestion that reference be made to the ongoing work on transitioning buses to alternative fuels is a good one and should be incorporated.
Director’s Recommendation
1. Make non-material amendment to the context by making reference to the ongoing work on transitioning buses to alternative fuels, with a commitment in the NDP to stop purchasing diesel-only buses for the urban bus fleet as well as ongoing Low Emission Bus Trials which were launched at the end of 2018. The ‘greening’ of buses trial aims to help further inform purchasing decisions for new buses over the coming years.

Section 6.8 Rural Transport

Submissions Received: 2019112, 2019028, 2019024, 2019099, 2019122

High Level Summary of Issues

It is recommended that the first sentence is amended to state that in addition to public transport services in rural areas provided by State and commercial transport operators, the NTA provides rural public transport services through the Local Link Rural Transport Programme Strategic Plan 2018-2022.

Submissions also note that given the proportion of the North West region which is classified as rural, this option to use public transport may not actually be available to a significant portion of the population. As a result, accessing employment, health services, hospital appointments, education and training and socialising can be more difficult for people. Vulnerable groups of people; older people and people with disabilities as well as those who are unable to afford a car living in rural areas are most affected by this. They rely on the goodwill of family members and neighbours to meet appointments and to go to the nearest town to do their day-to-day business. It is also suggested that there should be encouragement to move towards alternative fuels and away from fossil-fuelled vehicles is key to emissions reduction across the region. Other alternative fuels such as Compressed Natural Gas and Hydrogen are expected to come on stream in the coming years as an alternative to petrol and diesel. These alternative fuels do not feature prominently in the RSES which could be viewed as an omission in years to come.

The Rural Transport Programme (RTP) known as “Local Link” is delivered by six Local Link companies; Cavan -Monaghan, Donegal; Leitrim-Sligo-Roscommon; Mayo and Galway, delivering services to people in remote rural areas. The pilot scheme for evening services has now been extended until March 2019. This pilot should become a permanent service among Local Links. However, the services Local Link companies provide are still not accessible to everyone and the uber style service proposed in the last number of weeks should be explored further as it could be a solution to a raft of challenges facing people and businesses in rural areas.

It asks if RPO 125 should be reworded to emphasise that the focus is on cycle and walk ways to allow people including local residents, to access work, shops and other amenities in a safe and pleasant manner when on foot or cycling (focus appears to be on Greenways and Blueways).

Director’s Response
The comments are noted and it is agreed that this region does not have the same access to public transport and that alternative fuels is identified and given appropriate prominence within the
strategy. The suggestion to incorporate reference to the role of NTA and the Local Link Rural Transport Programme is accepted.

**Director’s Recommendation**
- Make non-material amendment in opening paragraph to state that in addition to public transport services in rural areas provided by State and commercial transport operators, the NTA provides rural public transport services through the Local Link Rural Transport Programme Strategic Plan 2018-2022.

**Section 6.9 Enabling Plans**

**Submissions Received:** 2019123, 2019064, 2019024, 2019066, 2019099, 2019141, 2019147

**High Level Summary of Issues**

The provisions of this section are broadly welcomed, whilst some comments considered that further debate on the role for e-vehicles as part of a City-Region transport strategy would be welcomed, linked back to commitments to low-carbon agendas, climate mitigation commitments, air quality, health and well-being. There was strong support from Ervia for the refuelling and recharging infrastructure provisions in RPO 133 and again there is support for the use of CNI (Compressed Natural Gas) across public transport.

It was recommended that this section should incorporate a requirement for Local Link Offices to be consulted in the development of Local Transport Plans as a stakeholder.

The NTA, DTTAS and TII make a number of recommendations that the wording be modified including the following:

1. Should reference the ongoing work on transitioning buses to alternative fuels, with a commitment in the NDP to stop purchasing diesel-only buses for the urban bus fleet as well as ongoing Low Emission Bus Trials which were launched at the end of 2018. These trials aim to help further inform purchasing decisions for new buses over the coming years, and we would therefore recommend that the ‘greening’ of buses be referenced.
2. Insert new Subsection - The Role of Transport in Enabling Access for All

**Subsection to read:**

The planning process affords an opportunity to facilitate and deliver a more socially inclusive society through better design, greater integration and accessibility across all societal needs and disabilities. Transport is one of several key policy areas through which social inclusion can be effectively addressed. Transport policies and transport investments will also be developed to assist the greatest number of people with mobility, sensory and cognitive impairments in the shortest possible time with a particular focus on meeting the needs and opportunities of an ageing population.

3. Insert New RPO: Invest in transport networks and services in the region that are socially inclusive and provide a quality of service, connectivity and facilities to meet all societal needs, disabilities (including mobility, sensory and cognitive impairments) and meet the needs and opportunities of an ageing population.
4. It is recommended that the role and function of LTPs be further clarified within section 6.9 by confirming that they will:
   i. Maximise the opportunities for the integration of land use and transport planning;
   ii. Assess the existing traffic, transport and movement conditions within the Plan area and in its wider context;
   iii. Plan for the efficient movement of people, goods and services within, to and from the Plan area;
   iv. Identify the extent to which estimated transport demand associated with local development objectives can be supported and managed on the basis of existing transport assets; and
   v. Identify the transport interventions required within the Plan area and in the wider context, to effectively accommodate the anticipated increase in demand.

5. In addition, the NTA requests that specific reference is made to the Area Based Transport Assessment (ABTA) guidance note, which was prepared jointly by the NTA and TII. It sets out a step by step methodology for the assessment and development of local transport policy and interventions. The ABTA process can be used to assess transport requirements at different spatial levels, including the development of Local Transport Plans and it is available on the NTA and TII websites: (https://www.nationaltransport.ie/wp-content/uploads/2019/01/ABTA Advice Note.pdf)

TII also make reference to the LTPs and recommend that the RSES ensure the integration of land use and transport planning through specific Regional Policy Objectives and that RPO 128 be reworded to confirm that the Assembly supports the collaborative preparation of Local Transport Plans led by local authorities in conjunction with the NTA and other stakeholders, based on Area Based Transport Assessment (ABTA) guidance, for Athlone, Letterkenny, Sligo Town, Cavan Town, Monaghan Town, Castlebar, Roscommon Town, Ballinasloe, Carrick-on Shannon, Donegal Town, Tuam, Ballina and other areas as may be determined. They ask for modifications to the wording of RPO 129 so that it does not be simply supporting the inclusion of LTP’s within plans but requires it to happen.

**Director’s Response**
The support for this section is welcome and the suggestion that Local Link be referenced is accepted. TII, DTTAS and NTA have made a very helpful contribution to this section and the RSES shall benefit by incorporating their suggestions.

**Director’s Recommendation**
1. Make non-material change to the contextual wording to section 6.9 so as to clarify the role and function of LTPs by confirming that they will:
   i. Maximise the opportunities for the integration of land use and transport planning;
   ii. Assess the existing traffic, transport and movement conditions within the Plan area and in its wider context;
   iii. Plan for the efficient movement of people, goods and services within, to and from the Plan area;
iv. Identify the extent to which estimated transport demand associated with local development objectives can be supported and managed on the basis of existing transport assets; and

vi. Identify the transport interventions required within the Plan area and in the wider context, to effectively accommodate the anticipated increase in demand.

2. Make non-material amendment by including in additional text that makes specific reference to the Area Based Transport Assessment (ABTA) guidance note, which was prepared jointly by the NTA and TII and that it sets out a step by step methodology for the assessment and development of local transport policy and interventions. The ABTA process can be used to assess transport requirements at different spatial levels, including the development of Local Transport Plans and it is available on the NTA and TII websites: (https://www.nationaltransport.ie/wp-content/uploads/2019/01/ABTA_Admadise Note.pdf)

3. Make non-material amendment by inserting a new subsection heading ‘The Role of Transport in Enabling Access for All’ and include the following under same:

The planning process affords an opportunity to facilitate and deliver a more socially inclusive society through better design, greater integration and accessibility across all societal needs and disabilities. Transport is one of several key policy areas through which social inclusion can be effectively addressed. Transport policies and transport investments will also be developed to assist the greatest number of people with mobility, sensory and cognitive impairments in the shortest possible time with a particular focus on meeting the needs and opportunities of an ageing population.

4. Make non-material amendment by inserting a New RPO to read as follows:

Invest in transport networks and services in the region that are socially inclusive and provide a quality of service, connectivity and facilities to meet all societal needs, disabilities (including mobility, sensory and cognitive impairments) and meet the needs and opportunities of an ageing population.

5. Make non-material amendment to wording of RPO 128

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

To:
The Assembly supports the collaborative preparation of Local Transport Plans led by local authorities in conjunction with the NTA and other stakeholders, based on Area Based Transport Assessment (ABTA) guidance, for Athlone, Letterkenny, Sligo Town, Cavan Town, Monaghan Town, Castlebar, Roscommon Town, Ballinasloe, Carrick-on Shannon, Donegal Town, Tuam, Ballina and other areas as may be determined.
LTP will inform the Urban Area Plans, development and local area plans and other planning framework documents.

Local Transport Plans (LTP) will represent the lowest tier of the NPF's framework for the integration of land use and transport planning and the achievement of the NPF's objective of 'compact smart growth'. They will be subject to further transportation and environmental assessment at local level as 'appropriate based on guidance available.

LTPs will be based on a clear set of objectives and the most recent demographic and travel information taking into account the policies and objectives of the Local Authorities, insofar as they align with those of National and Regional Policy.

LTPs will include the transport priorities for each settlement in terms of public transport infrastructure and services; cycle investment; improvements to the pedestrian environment; and road enhancements. Local Link Offices (Transport Coordination Units) will be consulted in the development of LTPs.

6. Make non-material change to wording of RPO 129
   From:
   Support the inclusion of policies, objectives and measures which emerge from Local Transport plans shall be incorporated into Development plans, local area plans and Strategic Development Zone Planning Schemes.
   To:
   Policies, objectives and measures which emerge from Local Transport Plans shall be incorporated into Development Plans, Local Area Plans, Strategic Development Zone Planning Schemes. Urban Area Plans and other relevant planning framework documents.

Section 6.10 – Digital Infrastructure

Submissions Received: 2019147, 2019068, 2019085

High Level Summary of Issues
The submissions encourage reference to the Smart Atlantic Corridor and its potential impact on the region. The abolition of mobile phone blackspots is a desirable objective. There is strong support for the National Broadband Plan and Mayo as a data centre destination.
**Director’s Response**

The Assembly supports the development of a smart region. The reference to the Smart Atlantic Corridor, should probably have mean Smart Atlantic Way which is a report on the digital state of the region. It concludes that this region is in its infancy with respect to being a smart region and that its achievement is a long term project.

The reduction of mobile phone black spots is supported by the Assembly and it already has policies in place in respect of this (refer RPO 136-138). The location of data centre destination is a function of energy resources, communication resources and talent.

The Assembly have no objection if Mayo meets the relevant criteria.

**Director’s Recommendation**

No changes recommended.

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**6.11 – Broadband Connectivity**

**High Level Summary of Issues**

There is universal support from a variety of organisations for the provision of high quality universal broadband throughout. The delivery of adequate services is seen as a minimum for the creation and continuation of vibrancy in all rural areas, including towns and villages. There is full support for RPO’s 141 – 162 which are constructed to deliver a smart region. There is some commentary on the extent of the graphics used in the section.

**Director’s Response**

The provision of broadband to this region is imperative to make our vision a reality. Broadband quality similar to urban areas is necessary for economic development, delivery of public services (e.g. Local Authority, Education, Health, Recreation) and two-way communication with the rest of the world. It is the equivalent of rural electrification in the last century. It also goes to the type of society we want to see in 21st Century Ireland, do we really want equality and equal opportunities for all areas in the region? If the answer to these questions is yes, the Assembly should strive to have the National Broadband Plan delivered within the lifetime of this strategy. The non-delivery of the National Broadband Plan could result in the loss of significant EU funding already ear-marked to implement the plan.

**Director’s Recommendation**

1. Amend text and reconfigure graphics
2. Amend RPO 136
   
   From
   
   Support the roll-out of the National Broadband Plan and grow the regional digital economy
To
Support the roll-out of the National Broadband Plan within the lifetime of this strategy and grow the regional digital economy

6.12 – SMART Region – Integrating Digital Trends

High Level Summary of Issues

There is general support in the submissions for the concept of a SMART Region. There are various advices on how its presentation could be improved, e.g. rewriting of objectives, minimisation of repetition and how implementation could be achieved successfully.

The big challenge to being a SMART Region will arise after the infrastructure has been provided. How the infrastructure will be used to create SMART?

Director’s Response

A SMART Region in the Northern and Western Area is an attempt by the Assembly to plan for the digital future. As discussed in previous sections, we are operating somewhat in a vacuum due to the inertia surrounding the National Broadband Plan. This does not however obviate our legitimate expectation that his region along with other rural areas in other regions will be granted the opportunity to fulfil our digital potential.

The emphasis in the country to date has been on SMART cities and these are now well established concepts. The concept of a SMART Region is novel in this country and at this stage is still worth pursuing through our strategy. The various RPO’s will be examined in the context of the submissions and revisions made where appropriate.

Director’s Recommendation

1. The context of RPO’s 136 (amended) and 152 are not the same and they should remain as they are
2. Omit RPO 156
3. Omit RPO 159
Section 6.12.3 – Concept (SMART Region)

High Level Summary of Issues

The submissions give an overview on the concepts of SMART cities and generally supports the extension of the concept into a SMART Region. It recommends consultation/collaboration between the proposals of each.

Director’s Response

The submission is noted and as outlined earlier this is a new departure for Regional Planning. Collaboration and consultation are prerequisites for success in this endeavour and it is our intention to fully engage in the process.

Director’s Recommendation

No changes.

Section 6.12.4 – Can Our Region Be SMART

High Level Summary of Issues

There is one submission form the DBEI who query the mechanics and resources needed to implement RPO 158 (Digital Skill Platform) and overlap with current work being carried out by DBEI (ICT Skills Action Plan)

Director’s Response

The submission is noted and there will undoubtedly be further consultation before any work is embarked on.

Directors Recommendation

No Changes.

Section 7.1 – Growth Ambition 4 - Introduction

Submission Received: 2019122
• It would be important to reference the ‘Updated National Action Plan for Social Inclusion’
  http://www.welfare.ie/en/downloads/Updated%20National%20Action%20Plan%20For%20Social%20Inclusion%202015-2017.pdf which provides the overarching policy framework for social inclusion, as well as the Social Inclusion and Community Activation Programme (SICAP) implemented by Pobal which operationalises social inclusion measures at regional and local level.

• The first paragraph of this section is highly inappropriate - must focus on people as individuals in society and discuss how the RSES will contribute to improving their quality of life and living standards.

• References to ‘Best Place to Live’ and ‘Coolest Place on the Planet’ relate to a very specific time/year and may not be appropriate to include in the opening statement of this chapter for a RSES with a timeframe to 2030.

**Director’s Response**

Links to policy frameworks for Social Inclusion and Community Activation Programme (SICAP) are informative and can be included in final document. There is nothing in the first paragraph that is inappropriate. Reference to ‘coolest place on planet’ dates document.

**Director’s Recommendation**

Include links to policy frameworks. Amend text to contextualise introductory comment.

**Section 7.2 – Inclusive Growth**

**Submission Received:** 2019122

**High Level Summary of Issues**

There are fears that the needs of employers outweigh all others in striving for economic growth. This section should have equal regard for those outside the workforce.

**Director’s Response**

The commentary on the labour force in this section is acceptable in an economic strategy. The participation rate is very much a creature of demographics and the rate is consistent with rates in
other regions. The short commentary in the Draft gives a flavour of how employment availability and attainment for different societal groups has ingrained societal benefit.

**Director's Recommendation**

No change recommended

### Section 7.3 – Horizontal Aims

**Submission Received:** 2019093

**High Level Summary of Issues**
The emphasis on global economic issues is too high and a more focussed individual approach should be taken in this sub-section.

**Director's Response**

There could be better elaboration on the horizontal aims in this section and some cross-referencing to relevant policy objectives would be informative. The links in the RSES between spatial development, economic strategy and benefits for society are not always obvious. A revised piece on these relationships would be worthwhile.

**Director's Recommendation**

Amend text to elaborate on benefits that may accrue from delivery of Horizontal Aims.

### Section 7.4 – Policies to Focus On

**Submission Received:** 2019122

**High Level Summary of Issues**
The commentary is incomplete in terms of education and skills. There is concern that not enough prominence is given to the existing and proposed STEM program. The extent/reach of the 3rd level colleges is deficient in the region.

**Director's Response**
There is text and figures missing for which an apology is warranted. The information in relation to educational attainment is contained within our Socio-Economic Report and should have been included in the Draft.

The Implementation Plan for STEM education runs from 2017 – 2019 and this is the first phase of the overall plan that runs to 2026, other parts of the plan will follow on. Support for the programme is support for making mathematical subjects more available to females in particular which is inclusivity by definition.

The Assembly note the query on the availability of 3rd level education in all parts of the region and would generally be in support of this.

**Director’s Recommendation**

1. Include Fig 38 from Socio-Economic Report and supporting text

2. Make Non-Material change to RPO 166

   **From:**
   
   Support the continuation of the STEM Programme

   **To:**
   
   Support the implementation of the STEM programme in Irish Education out to 2026

3. Make Material Alteration to RPO 169

   **From:**
   
   Supports the provision of third level education in the Cavan/Monagahan sub-region

   **To:**
   
   Support the provision of 3rd level education in Roscommon, Leitrim, Cavan and Monaghan

**Section 7.5 – Healthy Places**

**Submissions Received:** 2019012, 2019014, 2019015, 2019016, 2019093, 2019099, 2019122

**High Level Summary of Issues**

- There should be greater emphasis on health in terms of facilities and policies. Healthy living is a key component to Quality of Life. This should be reflected in land use policies in terms of take away locations for example.
- The area of community care is an important employer as well as providing important services for the elderly and others. This should have more prominence in the strategy. The policy objectives should be amended to reflect the above.
**Director’s Response**

This section focuses on healthy places in the context of inclusivity. The provision of health infrastructure whilst related is not the principal goal of this section. The comments on obesity and the role of planning authorities are noted, as is the creation of ‘no fry zones’

The prevalence of obesity in the country and by extension in the region are a matter of record. The Assembly also note the requests to re-order and re-write the RPO’s attached to this subsection.

**Director’s Recommendation**

1. Include reference to National Obesity Plan in RPO 176
   **From:**
   Support the objectives of public health policy including Healthy Ireland and the National Physical Activity Plan through integration with planning policy
   
   **To:**
   Support the objectives of public health policy including Healthy Ireland and the National Physical Activity Plan and the National Obesity Plan through integration with planning policy

2. Review to wording of RPO 170-175 to make them more inclusive

3. Relocate RPO 170 to Section 3.6A

4. To make a non-material amendment to RPO 172
   **From:**
   Promote the provision of high quality, accessible and suitably proportioned areas of public open space and promote linking of new open spaces with social, cultural and heritage sites.
   
   **To:**
   Promote the provision of high quality, accessible and suitably proportioned areas of public open space and promote linking of new open spaces with socio, cultural and heritage sites and buildings and prioritise access for walking and cycling.

5. Omit RPO 174
6. Omit RPO 175

**Section 7.6 – Age Friendly**

**Submissions Received:** – 2019099, 2019122, 2019097, 2019025

**High Level Summary of Issues**
There are overlaps between this section and the previous section. It would be good policy to make particular provision for the elderly in terms of land use by designating lands specifically for nursing homes and sheltered housing.

The concept of age friendly should be extended to include the younger sections of this community.

**Director’s Response**

There is a movement towards more healthcare being provided in the community with an increased emphasis and resources being applied to the Primary Care Sector. In tandem with this will be an enhanced requirement for the provision of other services for the elderly. The RSES through its land use policies will facilitate the delivery of such services through compact growth, sustainable transport infrastructure, recreational space, flexible building designs and the delivery of SMART/Modern communication systems.

The proposal to specifically zone land for nursing homes and sheltered accommodation is noted. The provision of such land is normally deemed to be included within residential zoning, it could be argued that as our planning system becomes more sophisticated and moves more to evidence based planning, specific zoning objectives are provided in development plans.

The commentary on ‘Age Friendly’ being relevant to more than just the elderly is of course accurate and acknowledgement of this should be taken.

**Director’s Recommendation**

1. Make non material amendment to RPO 177  
   **From:**
   Ensure local planning, housing, transport/ accessibility and leisure policies are developed with a focus on meeting the needs and opportunities of an ageing population and people with disabilities.
   
   **To:**
   Ensure local planning, housing, transport/ accessibility and leisure policies are developed with a focus on meeting the needs and opportunities of an ageing population, people with disabilities and younger persons.

2. New RPO – The Assembly supports the specific designation of lands in development plans and local area plans for nursing homes and sheltered housing.

3. Amend text to expand the definition of age friendly to include young sections of the community
Section 7.7 – Childcare, Education and Life Long Learning

Submissions Received: 2019012, 2019042, 2019099, 2019122

High Level Summary of Issues
The importance of education should be reflected with an increased emphasis in the strategy. The impact of BREXIT in particular should be examined. There are systemic barriers in access to education especially for single parents, rural dwellers and those from lower socio-economic groups.

The use of SICAP funding and LEADER are vehicles to address the issues above.

Director’s Response
There are similarities between this section and S7.4 policies to focus on in terms of quality of life. The provision of childcare services into the future should be linked to population targets and adequate social infrastructure. The Draft RSES gives a broad outline on where growth should be planned for, further elaboration and details on this will be provided by planning authorities in their preparation of County Development Plans and Local Area Plans. The Dept of Education and Skills are pro-active in ensuring integration between education infrastructure and population changes in recent years and evidence based planning informs their inputs.

The difficulties in accessing education generally and 3rd level education in particular are highlighted in the submissions especially in the case of peripheral areas of the region and various disadvantaged groups in our communities. The key to addressing these issues could be found in the calls for positive discrimination for parts of this region set out in S2.8 of the Draft and the emerging status of the region moving from a ‘more developed region’ to a ‘transition region’.

The impact of BREXIT on education are at this stage unknown as indeed is the whole concept of BREXIT. It is very difficult at this remove to plan for such eventualities and the NPF in S8.1 leaves it to future iterations to deal with the implications of BREXIT.

Director’s Recommendation

1. Make Non-Material Change in amalgamating S7.2 and S7.4
2. Make Non-Material change in RPO 163

From:
Support the co-ordination of employment skills and support in the region through the alignment of needs as identified by the Regional Skills Fora

To:
Support the co-ordination of employment skills and support in the region through the alignment of needs as identified by the Regional Skills Fora to include facilities and opportunities for disadvantaged areas and groups in the community.
Section 7.8 – Social and Community

Submission Received: 2019122

High Level Summary of Issues

- The Childcare paragraphs from 7.7 should be combined with P268.

Director’s Response

This section in the Draft is very small, has little narrative and no RPO’s. The issues referred to are dealt with more comprehensively in other sub-sections. There were no submissions specific to this sub-section.

Director’s Recommendation

Make Non-Material change by deleting this subsection from final RSES.

Section 7.9 - Housing

Submissions Received: 2019122, 2019077

High Level Summary of Issues

Existing housing is a much more important resource in terms of solving housing issues than provision of new housing stock. The availability of remote working is an untapped resource in terms of providing employment throughout the region but particularly in rural areas. There is an ask to have definitive policy on separation of new housing from public transport

Director’s Response

The distance of new housing to public transport is a crude measurement and one size cannot fit all. The support in the RSES for the preparation of local transport plans good urban design and sustainable modes of travel is more effective overall that trying to micromanage development by imposing specific distances. The intention to align housing and jobs is a tenet of the NPF and by implication this will be a feature through all the planning hierarchy.
Existing housing comprises a much larger portion of the national and regional housing stock than new builds. The emphasis on this element as a solution to supply problems is insufficient. The development of brownfield sites goes some way towards addressing the deficiency. Support for refurbishment, replacement and modernisation of all existing housing including those that, because of age or construction design standards are obsolescent should be incentivised and facilitated as widely as possible in all areas of the region.

The concept of remote working is increasingly a feature of the work/life balance. Opportunities to maximise gains in these areas are dependent on the provision of adequate communications infrastructure in the region. The importance of the delivery of the National Broadband Plan has not diminished and is an imperative if quality of life is to get prominence throughout the region.

The comments on housing delivery as they pertain to RPO 182 (Data for Housing) and RPO 184 (Regeneration Funds) are noted and greater clarity and focus is desirable in the formation of these objectives.

**Director’s Recommendation**

1. **Replace RPO 182**

   **From:**

   Provide information, data and evidence to Local Authorities to support them prepare Housing Need Demand Assessment (HNDA); to support the preparation of housing strategies and all related housing policy outputs, e.g. city and county development plans, local area plans, Traveller accommodation plans, Local Economic and Community Plans etc.

   **To:**

   Ensure that appropriate policies are outlined in development plans to deliver housing in the areas and quantities identified in this strategy.

   1. Reformulate RPO182 (Housing Data) to emphasise our oversight role in housing delivery and development
   2. Reformulate RPO184 to include mechanisms in addition to PPP
   3. Rewrite RPO 183 to include reference to homelessness, social and affordable housing.

2. **Replace RPO 184**

   **FROM:**

   Utilising the Urban and Rural Regeneration funds promote public and private partnerships and mechanisms to provide land for housing development

   **TO:**
Support the development of housing to meet the population targets in this strategy using as wide a variety of mechanisms as possible, including regeneration funds, Part V, direct public funding and public private partnerships.

3. **Replace RPO 183**

   **From:**
   Ensure sufficient high quality homes are developed in the right locations to support economic activity and regeneration linked with NPO 36

   **To:**
   Ensure that the housing delivered meets the needs of the community in terms of social, affordable, private and sheltered in urban and rural areas.

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**Section 8 – Growth Ambition 5 Infrastructure**

**Section 8.1 - Introduction**

**Submissions Received:** 2019026, 2019052, 2019080, 2019002, 2019144, 2019125

**High Level Summary of Issues**

There is general support for the objectives throughout Section 8, with a recommendation that Irish Water follow the lead offered by the RSES. The AEC has potential to become a key economic corridor and develop as a counterweight to the east and its corridor.

**Director’s Response**

The most common submission in relation to this subsection is support for the general objectives and approach in formatting the overall growth objective.

**Director’s Recommendation**

No changes proposed

**Section 8.2 – Energy Infrastructure**
Submission Received: No Submissions

High Level Summary of Issues
N/A

Director’s Response
There were no submissions on this sub-section

Director’s Recommendations
This section should be incorporated in S4.5.2 which deals adequately with the issues.
Section 8.3 – Electricity Grid (Changed Title)

Submission Received: 2019135, 2019148, 2019122, 2019145

High Level Summary of Issues

There is support for the North/South interconnector and other projects, a delivery schedule would be informative.

There are queries on the adequacy of the existing transmission system particularly in Donegal

Director’s Response

The most common submission was support for the North/South Interconnector. This project has been through the development consent process in this jurisdiction, it has yet to complete that process in Northern Ireland. There is an objective RPO 188 in the Draft which supports this project along with others identified in Table 1. (reference to grid west on map will be removed)

The prioritisation of projects in Table 1 is informed by the prioritisation of development in the strategy. Industrial undertakers are obliged to tailor their priorities to mirror those in the RSES. Nevertheless, we have been in contact with EIRGRID on their prioritisation plans and we await their response.

EIRGRID have assured us that the capacity of the network in the region is adequate in terms of demand and supply. They also assure us that capacity is continually under review and their ambition is to ensure that network capacity will not inhibit planned developments.

Director’s Recommendation

1. Make non-material change by removing reference to Grid west in Map.
Section 8.4 – Gas Networks

Submissions Received: 2019064, 2019122, 2019140

High Level Summary of Issues

There is support for conditional expansion of the gas network. There are also queries on the sustainability of expanding the network having regard to pending Greenhouse Gas emission limits.

Director’s Response

The submissions in relation to this subject somewhat contradicts, on the one hand Gas Networks Ireland support qualified expansion of the network whilst the EPA query the sustainability of expansion having regard to Greenhouse Gas emissions. The subject is also discussed in §4.5.2

On balance, the use of gas as an acceptable energy source is recognised in the country and whilst this may change in time, the expansion of the network in the qualified manner suggested can be supported by the Assembly at this time.

Director’s Recommendation

Make non-material amendment by relocating RPO 46, and 47 in §4.5.2 together with supporting text to this section.
Section 8.5 – Waste Infrastructure

Submissions Received: 2019025, 2019140, 2019122, 2019080, 2019028

High Level Summary of Issues
The incorporation of good waste management practices into the way the region does business is desirable. There is a general level of support for how the strategy deals with waste infrastructure with some recommendations on how this might be improved.

Director’s Response
There are a small number of submissions which on the one hand give overall support to the objectives and other specific submissions which home in on an individual elements of waste management e.g surplus electricity generation, anaerobic digestion and sewage sludges.

The latter items all appear to be matters for which solutions are technically possible but they have not widespread availability. They could be deemed to be included in RPO 195 which is an overall objective support the circular economy having regard to the proximity principle.

Director’s Recommendation
No Changes.

Section 8.6 – Water Services Infrastructure
Submissions Received: 2019122, 2019086, 2019112, 2019140

High Level Summary of Issues
Alignment between Irish Water and the RSES is an imperative, water services infrastructure is necessary to achieve growth targets.

The benefits from having regard to environmental designations and targets for good status in surface water bodies have wide ranging application. The infrastructure necessary to manage surface water is equally important to other water services infrastructure.

Director’s Response
The question of project prioritisation is a feature in the submissions, there are calls for the RSES to align with Irish Water. The planning acts require the converse and it is expected Irish Water will review their plans on adoption by yourselves of the RSES.

The prioritisation programme should follow the settlement hierarchy, the most challenging aspect of prioritisation is integration and scheduling all the infrastructure works needed to deliver integrated development.
The Assembly acknowledges the targets set in River Basis Management Plans to achieve water courses of good status and RPO 204 recognises and supports the identified goals.

The development of flood management and flood defences requires that the impacts on designated sites are fully considered. The OPW are the competent authority in relation to such projects and experience suggests that they take full cognisance of their responsibilities.

**Director’s Recommendation**

1. Amend RPO 205
   
   **From:**
   Support investigation for the elimination of combined sewers from our drainage networks and to implement same in the interests of sustainable development.

   **To:**
   Ensure Drainage Area Plans are prepared for Galway, Athlone, Monaghan and Roscommon.

2. Amend RPO 206
   
   **From:**
   Prioritising investment to improve storm water infrastructure to improve sustainable drainage and reduce the risk of flooding in the urban environment.

   **To:**
   Prioritising investment to improve storm water infrastructure to improve sustainable drainage and reduce the risk of flooding in the urban and rural environment.
Section 9 – All ISLAND COHESION

Submissions Received: 2019076, 2019004, 2019025, 2019033, 2019051, 2019135, 2019147, 2019080, 2019081, 2019144, 2019146, 2019051

High Level Summary of Issues
All Island Cohesion:
A dozen submissions received relate directly to the Section on Cross Border working, Cross Border relationships, which extend to infrastructure, common projects, as well as land-use, and other common interests. All of these submissions are fully supportive of Cross Border collaboration. EMRA recommend there be a stronger emphasis upon the Dublin/Belfast Economic Corridor and say that Cavan/Monaghan provide a strong linkage to the Northern and Western region. This submission also endorse three key pillars within All Island Cohesion Chapter, emphasising importance of energy transmission networks, digital infrastructure, tourism and environment of cross border communities.

Brexit: Within the uncertainties resulting from the UK’s proposed exit from the EU, the need to work together on a cross-border basis in the areas’ of healthcare, energy security, management of environmental assets, social inclusion, education, etc. is stated to be more important than ever.

NorthWest Metro City Region Derry / Strabane / Letterkenny: In addition to flagging the key infrastructure investments necessary to support the building up of this Metropolitan Region, it is worth noting also the strong working relationship between local authorities on both side of the border, higher education bodies and community partnerships. For example, the Ulster University, Letterkenny Institute of Technology, North West Regional College and the Donegal Education and Training Board signed a MOU in February 2018 in support of greater collaboration around education pathways and links with industry. Donegal County Council ask that when referring to the NW, it should be noted as the North West Metropolitan City Region.

Reference should be made to the Atlantic Economic Corridor in this section as this has the potential to be a key strategic cross-border corridor that can emerge as a counter-balance to the dominance of Dublin-Belfast Economic Corridor.

Environment: As natural assets do not adhere to man-made borders, there is a need for continued cooperation on the management of the region’s environment – shared landscapes, heritage, water catchments, habitats, etc. While this was identified as a key strategic area of cooperation at the start of the Chapter, it appears as a case study further in. This needs to be re-established as a strategic objective- and not confined to the Catchment care project.

Social Cohesion & Working together, ICBAN remarks as follows: a further key strategic priority for cross-border cooperation – that of Social Innovation, with an emphasis on nurturing the significant social capital that exists within this region. There is scope to work with the North South Social Innovation Network in developing this objective. The importance of promoting cross border collaboration and partnership is even more critical in the context of Brexit, for the large numbers of people commuting across the Irish border for work, study, and social purposes.
Cross-Border projects between local authorities have had a great impact on local communities. The continuation or replacement for such cooperation funds must be a key strategic priority for the outworking and delivery of the RSES in the border region. ICBAN recommend that consideration is given to developing an island-wide territorial cohesion policy, which would include a Cross-Border Infrastructure and Investment Plan / Fund, to replace any loss of common INTERREG and Peace funds.

There is a Need to recognise the Central Border Region as an area of national importance, providing it with a pathway mitigating the impacts of any negative Brexit out-workings. Such designation must be reinforced by a national commitment to address the identified strategic infrastructural investments and redress historic underinvestment. ICBAN suggests that the RSES should promote the siting of a University within the border region, to help develop skilled jobs in key regional industries such as engineering, agri-food/science and construction.

Submission identifies need for the proposed UK Shared Prosperity Fund to offer adequate support to cross-border cooperation and recognises the potential of the proposed PEACE PLUS programme, to support North-South and cross-border initiatives.

Support Cross border collaboration and reference Cross Broder Forum (Mid Ulster, Armagh/Banbridge/Craigavon, Fermanagh & Omagh, Monaghan).

- Support improvements to transport infrastructure - A5, A4 and A29 – vital cross border linkages.
- Refer to Cross Border Forum’s Joint Waste Management Plan – supports the RSES Objective that supports the Connaught Ulster Waste Management Plan.
- welcomes the dedication of a chapter within the draft RSES to ‘All Island Cohesion’ and, within this, specific reference to the North West Strategic Growth Partnership
- Broadly in agreement with the adopted approach.
- All Island Cohesion, Link with Sec. 2.7 on Brexit Risks.

**Director’s Response**

In general, there is a requirement to re-work the introductory Section of All Island Cohesion under Sections 9.1 & 9.2. This should include a re-focusing on the ongoing collaboration between Donegal & Derry Strabane District Council’s, to include additional detail on the Strategic Growth Partnership. This is in part due to a section of 3.6(b) Letterkenny / Derry Strategic Area Plan being repositioned into Section 9 so that the Letterkenny Regional Growth Centre is acknowledged as a Regional Centre in its own right and the cross-border city region planning fits coherently into an All Island cohesion context that is unique and bespoke.

There are a number of key cross border transport corridors referred to, which include:

(I) N2 / A5 Route from Ardee to Derry;
(II) The East / West Link from Dundalk to Sligo;
(III) The A-4 /N16; and
(IV) The A29 to Monaghan

All of these are reflected in Section 6 – Infrastructure. However it is appropriate that they are also referenced within this All Island Cohesion Chapter.
**Director’s Recommendation**

1. Make non-material amendment to RPO 211

From: To ensure the continuation & strengthening of cross jurisdictional management of River Basin Management Plans, as well as water framework directive cooperation.

To: To ensure the continuation & strengthening of cross jurisdictional management of River Basin Management Plans, as well as Waste Management Plans, and implementation of the water framework directive.

Make non-material amendment to review section 9.3 to make it more succinct and to incorporate reference to the following as key cross-border transport corridors:
   a) N2 / A5 Route from Ardee to Derry;
   b) The East / West Link from Dundalk to Sligo;
   c) The A-4 /N16; and
   d) The A29 to Monaghan

2. Make non material amendment to Section 9.2 to incorporate a more detailed account of North West Metropolitan Strategic Planning as detailed in Appendix 3.

**Section 10 – IMPLEMENTATION**

**Submissions Received:** 2019006, 2019112, 2019042, 2019002, 2019028, 2019057, 2019144, 2019146, 2019028, 2019002

**General Comments on Implementation**

The general comments on implementation expressed concern that the RSES Draft was somewhat weak on the specifics of implementation, and in how the RSES targets were to be monitored and reviewed. Several submissions note the Draft RSES for the Southern RA, and the Eastern & Midland RA contain implementation measures including an implementation / oversight board, which will sit at regular intervals, and will review the progress on objectives. It is suggested that this may be worthy of consideration for the RSES, as well as the Galway MASP, and Regional GCP’s for Sligo, Letterkenny & Athlone.
**Director’s Response**

It is acknowledged that this section is weak and it would be appropriate to provide clarification through the reconfiguration of this section.

The Draft is set out as follows:

10. Implementation

10.1. Introduction

10.2. Organisation

10.3. Delivery

10.4 Monitoring

10.5 Funding follows Policy

The new Configuration should be:

Implementation

Introduction

Legislative Background

Funding Follows Policy

Monitoring & Delivery

**Section 10.1 – Introduction**

As reflected in the general comments, submissions suggest the setting up an implementation group to include an environmental sub group. It also highlights the need for a mechanism to ensure action is taken to support the RSES objectives. It is highlighted the draft RSES contains very little information on how alignment can be achieved especially when there are different sectoral and national and regional priorities and therefore different and possibly divergent policies and investment strategies.

The Irish Planning Institute, and several other submissions note that when the RSES is delivered, and Local Authorities review their Local / County Plans, this should not have any adverse impact on the delivery of housing in 2019 – 2021. The Regional Assembly must ensure comprehensive reviews of Local and County Plans and deliver consistency across the Region.

It is suggested that there is a need for an RSES implementation Group, the other 2 RSES’s contain such a mechanism, and the NWRA must do likewise. It is noted that there is no mention of how a joint UAP for Athlone will be monitored and this is insufficient. An Implementation body should consist of various stakeholders, including experts in housing, transport, infrastructure, and industry. Similarly, the MASPs and RGCPs should have oversight on implementation.

Additionally, at least one submission proposes that the RSES should instruct Local Authorities to alter Development Contribution Schemes: and DCS’s should be tailored to favour infill / brownfield / Regeneration lands. This has been done in Limerick City. Special rate to encourage residential development in urban core’s.

IBEC propose that the NWRA take steps to ensure a Regional Map should be developed, tracking Capital Projects, and the stage they are at (An NDP / NPF tracker). Currently there are 23 Regional Projects of scale listed in the NDP. This would maintain focus on fixing gaps, and other schemes identified where gaps exist.
Director's Response

The comments being made are valid and it would be appropriate to shorten and reduce the volume of text within section 10.1. Introduction, by removing Para. 5,6,7, 9 & 10. And adding new text following para. 10.

Directors Recommendation

Make Non material change to Amend 10.1. reducing the length of narrative by approx.50%, removal of para 5,6,7, 9 &10. Add the following Narrative to the Conclusion of 10.1.

A primary task is to ensure that all Local Authority Development Plans, and Local Area Plans must be consistent with the general policy, ambitions, and objectives of the RSES in achieving sustainable compact growth, and to reflect the 10 strategic outcomes set out in the NPF. Following the review of all County / City Plans which are due to follow the adoption of the RSES, the Regional Assembly will assess and review all planning policy documents with a primary goal of making certain Local Policy aligns with National and Regional Policy. It is further intended that the same process will apply when the Local Economic & Community Plans (LECP’s) are being updated, and replaced across Connacht / Ulster.

Section 10.2 – Organisation

Several submissions note the overall structure across state agencies and they are highlighted as a potential barrier to the effective implementation of the RSES. It is suggested that if the goals and priorities of sectoral agencies are not aligned with RSES then implementation will be difficult if not impossible. Such organisations may find that what is appropriate for their function is not in line with the RSES. Within the overall Hierarchy of sectoral strategies, and economic plans, there should be a mechanism for resolving or considering such conflicts to ensure that they are not ignored, but so that appropriate decisions are made by the responsible organisations.

Director’s Response

The issues raised are understood and there is scope for Section 10.2 to be expanded to set out the Legislative Background associated with the RSES.

Director’s Recommendation

1. Make non-material change to headline of Sec 10.2. from Organisation to 10.2. Legislative Background.
2. Make non-material change the text at 10.2. Retain the first paragraph and delete, in full, the second paragraph which will be replaced with the following text:

In relation to monitoring of the RSES, there are a number of requirements in Legislation which need to be fulfilled:

...
• Under the Local Government Reform Act, 2014, the specified public bodies and all Local Authorities within the region are required (every 2 years) to prepare and submit a report to the Regional Assembly which sets out progress made in supporting objectives relevant to the RSES.
• The Northern & Western Regional Assembly will every 2 years prepare a report which monitors the progress in complying and following the objectives of the RSES. This report will evaluate measures taken in respect of Objectives, and monitoring of specific actions, required by a number of stakeholders.
• The NWRA will submit this Progress Report to National Oversight & Audit Commission (NOAC). It is open to NOAC upon review of the Report to make recommendations to the Minister of Housing, Planning & Local Government to suggest additional measures (where necessary) to support the effective implementing of the RSES.
• Public & Statutory Bodies are expected to lend whatever assistance is practicable to ensure the RSES objectives are delivered.

3. Delete text on Land development Agency and Office of the Planning Regulator on pages 302 & 303 (Strategic Collaboration) and insert new text in respect of same at the end of Section 10.2. Which contains further elaboration on the Land Development Agency, and the Office of the Planning Regulator.

Land Development Agency (LDA)

The LDA has an urgent focus on managing lands which are currently within the ownership of the State, or various State bodies, with the aim of regenerating under utilised sites, and increasing the supply of new homes and boosting housing supply. In the longer term, it is envisaged the LDA will assemble strategic landbanks through a mix of public, and private lands, and making these lands available for housing in a controlled manner which brings necessary stability in the medium and longer term to the Irish Housing market. It will be important that the assets held by the state in this regard are identified, and utilised, particularly in Galway, and our Regional Centre’s of Athlone, Letterkenny & Sligo.

Office of the Planning Regulator (OPR)

The Office of the Planning Regulator enacted under the Planning & Development (Amendment) Act, 2016 has resulted in the recent establishment of an independent Office if the Planning Regulator (OPR). This office, will have a role in monitoring activity, advising the Minister, the DHPLG, as well as the Houses of the Oireachtas on implementation of the National Planning Framework. This will be done through further monitoring of the RSES, as well as Local Authority Plans, and decisions of An Bord Pleanala. A new set of Planning Indicators will be developed to assist effective monitoring of Urban & Regional growth.

Section 10.3 – Delivery

Comments in general submissions reflect the Implementation section as being somewhat lacking in specific measures, and as part of the reconfiguration in relation to Implementation, it is proposed to delete heading in respect of Section ‘10.3 Delivery’ and replace with ‘10.3. Funding Follows Policy.’
**Director’s Response**

It is considered that the suggested amendment to the heading in respect of Section 10.3 has merit.

**Director’s Recommendation**

Make non material amendment: Delete ‘10.3. Delivery’ and replace with ‘10.3 Funding Follows Policy.’

**Section 10.4 – Monitoring**

It is submitted that measuring the successful implementation of the RSES will need focus on measuring outcomes at a regional and sub-regional level and indicators need to be devised and used to benchmark and monitor progress. Where available indicators measuring rural and urban difference should also be used.

Many of the indicators contained in the ‘Socio Economic Baseline Report’ are drawn from Census 2016 and will not be available annually. It is stated that it would be useful to know which specific indicators will be used for the annual report.

A number of submissions state that the success of the RSES depends on funding through Departmental and State and Semi-State Agency expenditure decisions and allocations, including the NDP. Therefore, they need to be fully aligned with the spatial priorities outlined in the RSES. Furthermore, it is noted that discussion on EU Priorities post 2020 includes the future focus on five EU policy objectives, which provides some context for future EU policy and funding but it provides little information on Implementation.

**Director’s Response**

The concerns in relation to a lack of specific measures in Section 10 are noted, details in relation to a Monitoring Committee / Review Body, how it is to work, and who will sit on same is a level of detail that needs to be worked through. At this stage in the process it would be appropriate to provide that it would be representative of a broad spectrum of stakeholders. The committee should be an RSES Oversight Committee that takes on a role in advising the Assembly on implementation, monitoring and reporting of progress made in implementing the Regional Spatial and Economic Strategy. There is also merit in identifying the priority to be given in implementing objectives of the RSES, as short, medium, long-term or ongoing. Short Term would be 2026, medium term would be 2031 and long-term would be 2040.
**Director’s Recommendation**

Make material amendments, and additions to the Text, and insert an additional RPO as set out below:

1. Insert text setting out the need to provide priority to be given to the implementation of objectives using the following Matrix

<table>
<thead>
<tr>
<th>RPO Ref No.</th>
<th>Implementation Timescale</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Short (2026)</td>
</tr>
<tr>
<td>1</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td></td>
</tr>
</tbody>
</table>

1. Insert following text at end of 10.4

**RSES Oversight Committee:**

As previously referenced, the Local Government Reform Act, 2014 provides for consultation with key public bodies in the preparation of the RSES, and furthermore, it provides for additional interaction with these bodies in the review of the RSES. An RSES Oversight Committee should therefore be established within 6 months of the adoption of the RSES. This Committee will comprise representatives from the following area’s:

- The Regional Assembly.
- Local Authorities
- Named Public Bodies.
- Bodies representing Environmental interests, Civil society, and social inclusion, and economic development.

2. Insert New RPO at end of Section 10.4 as follows:

The Regional Assembly will review the RSES every 6 years, and this review will if necessary modify, or revoke Policy should the need to do so arise. In this respect, the following Regional Policy Objectives apply:

1. **RSES Oversight Committee:** Within 6 months of the adoption of the RSES, an RSES Oversight Committee will be established to ensure oversight of the implementation, monitoring and reporting of progress in implementation of the RSES, as well as identifying opportunities to drive Regional Development, and suggest sources of funding, fostering partnerships / new collaborations.

2. The RSES Oversight Committee will assess (i) Issues that impact upon the effectiveness or performance of the strategy. (ii) Evaluate the progress made across all Regional Policy Objectives, including those of the Galway MASP, and the Regional Growth Centre Strategic Plans for Sligo, Letterkenny & Athlone.
3. (a) The Northern & Western Regional Assembly will every 2 years prepare a report which monitors the progress in implementing the RSES  
(b) As part of the RSES review process, the NWRA will publish (and update) an infrastructure tracker, and progress report every 2 years. This report will update the status of all major Regional Infrastructure Projects.

4. It is an objective to carry out a review and update of baseline data for the purposes of monitoring and reporting of progress in implementing the RSES. Said data shall be published on the NWRA website.

Section 10.5 – Funding Follows Policy

Submissions Received: N/A

Director’s Response

It is considered that this section would be better placed within Section 10.3.

Director’s Recommendation

Reposition Section 10.5 to 10.3.
APPENDIX 1

LETTERKENNY REGIONAL GROWTH CENTRE STRATEGIC PLAN

CONTENTS (Subject to revision & re-ordering):

1. Context & Vision
   1.1. Letterkenny & its role within the North West Metropolitan City Region
        Letterkenny / Derry / Strabane (NWMCR).
   1.2. Letterkenny Regional Growth Centre Plan

2. Strategic Goals & Objectives
   2.1. Compact Growth & Delivery Of Residential Development For An Expanding
        Regional Centre: Urban Regeneration
   2.2. Residential Growth
   2.3. Liveable Letterkenny
   2.4. Education

3. Critical Enabling Infrastructure for Letterkenny
   3.1. Key Projects & Estimated Delivery

4. Enterprise & Employment – Future Economic Expansion
   4.1. Indigenous Enterprise & FDI
   4.2. Retail – County Lead
   4.3. Tourism – Destination Town

5. Implementation:

Maps: (i) NWCR Map (DCC), (ii) Letterkenny RGCP Boundary Map (NWRA), (iii) Regional Centre
     Schematic Map (DCC), (iv) Opportunity Sites, (v) Residential Nodes, (vi) North Donegal Ten-T
     (DCC)
1. Context & Vision

1.1. Letterkenny & its role within the North West Metropolitan City Region

Letterkenny is identified as one of the Regional Growth Centres within the region but it is also recognised as part of a Cross Border Network with Derry City, within the North West City Region. The North West Metropolitan City Region (Letterkenny / Derry / Strabane) is identified in the National Planning Framework (Ireland 2040) as being a key enabler of Regional growth, and prosperity across Donegal, Derry & Tyrone.

The co-ordination of further growth across jurisdictions is the subject on ongoing work between both Donegal County Council and Derry City and Strabane District Council, this is an ongoing project, and is being advanced through a Growth Partnership. This Metro Area includes other significant settlements within Donegal, including Buncrana, and Ballybofey / Stranorlar. This NWMCR context is elaborated upon within the All Island Cohesion chapter. It is centered on four key strategic outcomes – closely aligned with the national strategic outcomes and priorities of the National Planning Framework (NPF) and the eight strategic aims of the Regional Development Strategy (RDS) 2035. Those outcomes are:

- Building Inclusive and Compact Places;
- Investing in Connected and Accessible Places;
- Planning for a Vibrant Economy and Nurturing Communities; and
- Creating Resilient Places and Low-Carbon Infrastructure.
1.2 Letterkenny Regional Growth Centre Strategic Plan

Regional Growth Centres have been selected in the National planning framework because they are significant large towns that function in their areas in a similar manner, but at a different scale to the bigger cities. In the same way that the NPF requires Metropolitan Area Strategic Plans (MASP) to be prepared for each for Ireland’s five cities, a Strategic Plan that responds to the lead role of each of the identified Regional Growth Centres is also required, with a similar focus.

This Strategic Plan for Letterkenny provides a framework for the strategic growth and investment in Letterkenny to deliver its function as a city and the primary urban centre within Donegal. It will chart the future growth of Letterkenny with an ambition to grow the population by at least 28,000 by 2040 and to ensure that commensurate employment growth is enabled, through appropriate investment in critical enabling infrastructure and support services, with strong emphasis upon the placemaking principles, as set out within the RSES. The goal is to ensure Letterkenny is a centre that offers sustainable choices in housing, employment, transport, and in the area of quality of life, health and well-being. The Strategic Plan should act as an instrument that enables this to happen.

The investment in Letterkenny is also vital to the future growth and development of all of County Donegal, with its reach and influence extending into all of the County and cross border, playing a key role in this part of the North West Region, including as a centre of employment, retail, health, education, social, cultural and community services etc for its extensive hinterland.

The existing employment provided in the public sector, retail, and major sectors such as Engineering, and ICT indicate that Letterkenny is already well placed to underpin the growth of the entire region of North & West Donegal. The successful growth and expansion of Letterkenny can be realised through increased, and significant capital investment in critical infrastructure, which will improve
services, and accessibility, into and around the urban core, and a focus on enhancing quality of life for all its inhabitants.

**Vision:** Between 2020 and 2040 Letterkenny will grow to a centre of over 30,000 people, and will encompass all the key characteristics of a future city, with an expanded employment base, an additional 4,000 houses, together with an expanded offering in education, public services, civic spaces, and a Regeneration & reconfiguration of the extended Town Centre. Letterkenny will offer sustainable choices in housing, employment, and is a centre which is pedestrian friendly, well served by public transport, with an emphasis on well being, supported by a healthy environment, and quality spaces in the public realm.

**The Strategic Plan Area:**

The boundary of the Regional Growth Centre Strategic Plan has been informed by identifying the main population and employment locations of the settlement that define the Principle Urban Area and those areas on the periphery with high commuting patterns. Geographical features and environmental considerations also inform the strategic plan boundaries. The boundary of the Letterkenny Regional Growth Centre Plan includes the Town Boundary as defined by the CSO, as well as incorporating additional small area’s which are considered urban in character and accord with CSO small area boundaries. The boundary incorporates all main residential area’s, employers, and education facilities. The surrounding towns / villages (e.g. Drumkeen, Ramelton, Kilmacrenan). Whilst these surrounding towns, and villages in the zone of influence of Letterkenny will retain their role in offering housing, and other activities the Growth Centre Plan is focused on Letterkenny and its current, and future role of the Town as an economic driver for the whole of Donegal.
2.0. STRATEGIC GOALS FOR LETTERKENNY

2.1 COMPACT GROWTH & DELIVERY OF RESIDENTIAL DEVELOPMENT FOR AN EXPANDING REGIONAL CENTRE:

Letterkenny’s population currently stands at 19,300 (CSO, 2016). The total number of jobs within the town 11,400 (Powscar 2016), this is almost 30% of the overall jobs within County Donegal. The growth targets set out for Letterkenny are an overall growth in population of 40% to a population of approximately 30 - 35,000 by 2040. In tandem to this growth, it is anticipated that employment numbers will also increase by approximately 7,000 additional jobs, bringing the overall number of jobs to approximately 18,000. Accordingly, the Letterkenny RGCP needs to include all the elements to provide for this growth, including additional housing, employment lands, retail offer, a high quality of life offer, and community, social & recreational attractions which ensure this. It should be noted the Letterkenny & environs Local Area Plan is currently being prepared, and this RGCP is a high level & long-term documents to accompany the RSES, and is not intended to supersede the LAP.

<table>
<thead>
<tr>
<th></th>
<th>Letterkenny 2016</th>
<th>Letterkenny uplift 2026</th>
<th>Letterkenny uplift 2031</th>
<th>Letterkenny 2040</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population:</td>
<td>19,300</td>
<td>3,150</td>
<td>4,750</td>
<td>Population:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>28,000</td>
</tr>
</tbody>
</table>

New Plan for Letterkenny: Initial Consultation of the development of a new Letterkenny & environs Local Area Plan for Letterkenny have recently concluded, and this new Framework for Letterkenny
will provide the detail to ensure the delivery of the Regional Growth Centre Plan, including identification of zoning priorities, phasing of zoning, and detail on the regeneration & town centre design framework to be delivered over the lifetime of the RGCSP.

OBJECTIVES:

1) RGCO 1: To grow Letterkenny to a Regional Centre of approximately 28,000 by 2040.
2) RGCO 2: To grow the number of jobs in Letterkenny to approximately 16,000 by 2040.
3) RGCO 3: To ensure that at least 40% of all newly developed lands (Residential, Enterprise & Employment) are within the existing built up envelope of Letterkenny & its environs.
4) RGCO 4: To provide an additional 3,000 -4,000 residential units within Letterkenny to facilitate the growth as set out at No.1, above.

2.3. Regeneration & Renewal Projects

Key Regeneration / Renewal sites: There are a number of regeneration projects which have the potential to transform the town’s centre, including the Main Street, and area’s immediately surrounding the Main Street, and between the Main Street & Retail Park Area’s.

   (i) Town Centre - Strategic Design Framework
   (ii) Church Lane – Continued Regeneration & Restoration
   (iii) Lower Main Street.
   (iv) Opportunity Sites: (1) Donegal Creameries site, (2) Gortlee Site, (3) Unifi lands, (4) Lands at Port Bridge (5) Former Mart at Sentry Hill.

Each of the opportunity sites represents brownfield development within the Town, and the re-use of these sites would represent a key element of achieving the Compact Growth objective which is a central pillar of the NPF. The Letterkenny & Environ Plan will set out further detail in respect of these sites, and the parameters within which they can be redeveloped, the locations of these sites is mapped below.

Inter-Linkages across Town Centre: Creating a more coherent, and inter-linked town centre has been recognised as a key strategic goal for Letterkenny since before the 2009 Letterkenny & Environments Plan. The achievement of an improved inter-connectivity between the original Town Centre (Main Street Zone) and the new Retail Centre, including the Retail Park, and the Area surrounding Letterkenny Community Centre. The advancement of this Framework should include prioritisation of pedestrian friendly linkages, with identified walkways, crossing points, and similarly lanes and improved route availability for cycling. The Letterkenny & Environments Plan will set out further detail in respect of these sites, and the parameters within which they can be redeveloped.
2.4. Residential Growth

Letterkenny is the key urban settlement within the Donegal. Since 2006, the population living within the Town Boundary has increased by almost 10%. The ambition in the coming 20 years is to significantly advance upon this growth giving Letterkenny many of the future requirements to build on its function as a regional city in its own right. Letterkenny has a number of established neighbourhoods with potential to develop new ones.

*Established neighbourhoods:* Glencar, Kiltoy, Lisnennan, Lismonaghan, Mountain Top, Ballymacool

*Potential new area’s for Residential Development:* Leck / Scibley, Windy Hall, Killylastin, Carnamuggagh.
To cater for projected growth, it is likely that at least an additional 4,000 new homes will need to be provided between now, and 2040. The phasing of this growth in residential units, will have to be done in tandem with the approximate growth figures outlined in the Table above.

Central to this future growth will be to ensure the delivery of 40% of future homes are within the built up envelope of Letterkenny. Achieving this will require the identification of lands which are already within the built up envelope of the town and can be located close to potential public transport corridors, or within accessible walking distance of the town centre.

Neighbourhoods: There are 8 distinct and recognised neighbourhoods and the forthcoming Letterkenny & Environs Plan presents an opportunity to re-examine them and to deliver further measures, such as neighbourhood centre’s, and additional consolidation measures depending on the extent of projected future growth of the area’s set out below, as well as any new residential centre’s.

In addition to the established neighbourhoods, there are a number of area’s where there are opportunities to provide infill and/or consolidating development that would assist in expanding the growth of the Town, without significantly extending the overall urban footprint in an outward manner, such as greenfield lands between Carnamuggagh and Lisnenan, and between Windyhall and Glencar.
HOW CAN THIS BE ACHIEVED?

Delivering 4,000 new homes – How can this be achieved. measures include:

1. Ensuring the Zoned Lands are delivered sequentially in a phased basis, providing for compact and inclusive places.
2. To ensure that within the extended Town Centre area, that a mix of residential accommodation is included within mixed use developments, which cater for a wide variety of needs, including students, and smaller family units / single occupancy apartments based upon the housing needs of the town.
3. In the medium term to ensure the Southern Relief Road (Part of the Ten-T at Leck/Scribley) enables a greater extent of new residential growth to the South of the River Swilly, with enhanced links to the Town Centre, through a new crossing of the Swilly, and a new neighbourhood focal point.

OBJECTIVES for Regeneration & Compact Growth

1) RGCO 10: To develop a Town Centre Living Scheme within 3 years of the adoption of the RSES, and to ensure the main findings of this Scheme are implemented by 2025.
2) RGCO 11: To deliver a Masterplan, in Urban Regeneration & Linkages between the Main Street Area, and the New Retail Park within 4 years of the adoption of the RSES, ensuring this Masterplan is delivered and implemented by 2027.
3) RGCO 12: To expand Letterkenny’s bed-night capacity, and overall Tourist Offer as a Destination Town serving the Northern Headlands of the WAW.
4) RGCO 13: To consolidate existing neighbourhoods (hereinunder listed) through a series of targeted measures. Town Centre, Glebe / Kiltoy, Lisnennan, Carnamuggagh, Glencar Scotch, Glencar Irish, Ballymacool & Oldtown.

2.5. LIVEABLE LETTERKENNY

Letterkenny is already well served with a number of outstanding public realm facilities, which include An Grainan Theatre, Aura Leisure Centre, Ballymacool Park at the Southern edge of the Town & Bernard McGlinchey Town Park. The challenge in the coming years is enhancing sustainable connectivity to some of these facilities. In order to ensure Letterkenny becomes a less car dependent large town, dedicated cycle networks are key to enabling more sustainable modes of transport across the Town. In tandem with such provision, will be a need to provide
adequate bike facilities at the aforementioned locations, as well as a number of other identified strategic sites.

2.6. Education

LYIT has approximately 4,000 students, and has expanded by 40% in enrolment numbers in the last 10 – 15 years. The IT has in recent years secured a significant site on the Southern side of the Derry Road, opposite their existing campus, which will enable future expansion without the fragmentation of the student facilities. It is one of the key strategic aims for Letterkenny over the next 2 decades that this expansion is realised, and the range of courses, and number of under Graduates, as well as Post Graduates is increased incrementally between now and 2040. This expansion is expected to take place in tandem with University status for LYIT, as part of the Connacht / Ulster Alliance, where talks remain ongoing with Sligo IT, and GMIT.

Facilities at Primary School Level extend to 7 Schools. Three of these Schools (the 3 largest) are located outside the Town Boundary (Woodlands, Lurgybrack & Ilistrin). The provision of the new Educate Together Campus in 2018 has brought additional capacity to the Primary School system in the Town Environs. The future provision of a significant residential neighbourhood to the South of the River at Leck / Scribley, and the Southern Relief Road associated with the Ten-T project delivery may require an additional Primary School in this area.

There are 4 Secondary Schools in the Town, with Donegal County Council communicating with the Dept. of Education in relation to additional provision should the need arise. The re-development & enhancement of the St. Eunan’s Secondary School Campus is a priority in Educational infrastructure provision.

3.0. CRITICALLY ENABLING STRATEGIC INFRASTRUCTURE FOR LETTERKENNY

3.1. In order to achieve the population growth, economic advancement, including significant employment growth, and advancement in the overall offer for citizens, and visitors alike, Letterkenny has a number of key projects which must be delivered over the next 10-20 years, and indicative timeframe is attached for each, applicable from 2019:
Table XX: Critically Enabling Infrastructure for Letterkenny

<table>
<thead>
<tr>
<th>Critically Enabling &amp; Transformative Projects for Letterkenny</th>
<th>Indicative Timeframe Delivery (Short – 2026; Medium – 2031; Long – 2040)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Donegal Ten-T Improvement Scheme’s. Strategic Regional Connectivity (N-13, N-14 &amp; N-56)</td>
<td>Short/Medium</td>
</tr>
<tr>
<td>2. Letterkenny Urban Design &amp; Masterplan for Town Centre.</td>
<td>Short</td>
</tr>
<tr>
<td>3. Regional Transport Hub for Letterkenny</td>
<td>Short</td>
</tr>
<tr>
<td>4. LYIT Campus Extension</td>
<td>Short/Medium</td>
</tr>
<tr>
<td>5. Urban Greenway Development around Letterkenny: Letterkenny – Burtonport, River Swilly Greenway</td>
<td>Medium</td>
</tr>
<tr>
<td>6. Development of Letterkenny Social Enterprise Centre.</td>
<td>Short</td>
</tr>
<tr>
<td>7. Creating a ‘Smart’ Regional Centre.</td>
<td>Short</td>
</tr>
<tr>
<td>8. Town Centre Living Scheme: Regeneration of Derelict &amp; Vacant Sites</td>
<td>Short/Medium</td>
</tr>
<tr>
<td>9. Development of Town Centre Enterprise Quarter</td>
<td>Short</td>
</tr>
</tbody>
</table>

Connected Letterkenny: Enabling Projects:

1. **Ten-T Projects:** The key infrastructure needs of Letterkenny & Donegal are set out in the RSES (Sec 6). The delivery of the Ten-T improvement schemes, including the provision of the strategic river crossing (Swilly) via the N-56 Bonagee Link and the significant upgrading of the road network approaching the Town from the South (Southern Relief Road). The combined significance of these investments, including reduced travel times to Letterkenny from East Donegal, and Northern Ireland will directly impact upon the Town, allowing for multi-modal access across Letterkenny, and providing more effective long term traffic management beyond 2040.
2. **Regional Transportation Hub:** Letterkenny currently does not have a multi purpose transportation point. There are multiple Private operators transporting patrons around Ireland, and wider Donegal on a daily basis, and the stop adjacent to the Oatfield Roundabout does not have sufficient capacity to cater for growing demand. The provision of a Transportation Hub, which is within the Town Core, and within walking distance of the Town Centre & LYIT is a priority piece of infrastructure to increase accessibility and connectivity in Letterkenny. Whilst a specific site has yet to be identified, the RTH is a critical priority in the coming years.

3. **Cycle Lane & Urban Greenway:** Easy and safe Cycling and walking facilities will form a key priority for Letterkenny’s Centre, and Neighbourhoods over the next 2 decades. Secure cycling, and dedicated lanes for bicycles are recognised as a direct incentive for people to travel to school and work without being dependant upon the private car. A cycle route network will be prepared in the next 2-3 years, and this will include a Greenway along the River Swilly, as well as a full Landuse & Transportation Strategy to establish a number of key priority cycle routes which traverse the Town. Provision shall also be made for the Letterkenny – Burtonport Greenway, along the Former Donegal Rail Line, and onto the Cycle lane being provided along the newly realigned Section of the N56 at Illistrin / Coolboy.

4. **Public Transport Linkages:** A Local Transportation Plan (LTP) will be prepared in the short term for Letterkenny, the LTP should examine the current lack of alternatives to the car, and landuse patterns which can better effect a modal shift to public transport, as well as walking
& cycling. A new Regional Transport Hub shall form a central part of this vision, as well as the potential of Bus corridors, Park & Ride facilities & neighbourhood services.

**OBJECTIVES for Critical Infrastructure:**

1) **RGCO 5:** To deliver the entire Ten-T network solution for Donegal & Letterkenny by 2028, including the N-56 Link, and the Southern Relief Road (Leck Road), the N-14 Manorcunningham – Lifford. & N-13 Letterkenny Bridgend.

2) **RGCO 6:** To facilitate the expansion of the LYIT Campus.

3) **RGCO 7:** To prepare (within 2 years of the adoption of the RSES), a Local Transport Plan (LTP) for Letterkenny, which will include a multi-modal focus, and Public Transport roadmap.

4) **RGCO 8:** To develop a dedicated & integrated cycle network around Letterkenny, including the creation of a Greenway along the line of the River Swilly to offer residents a viable alternative to car based journeys.

5) **RGCO 9:** To deliver a multi-purpose Public & Private Regional Transport Hub within the Town Core of Letterkenny to serve County Donegal & the wider Region. **RGCO 13:** To carry out a feasibility study which investigates the potential & viability of a Rail Link between Letterkenny & Derry in future decades.

**4.0. ENTERPRISE & EMPLOYMENT - FUTURE ECONOMIC EXPANSION:**

**4.1. INDIGENOUS EMPLOYMENT & FDI**

Letterkenny is the economic driver of County Donegal. There are currently (CSO 2016) 11,400 Jobs in Letterkenny, which comprise approx. 28% of the overall jobs figure for County Donegal this share is anticipated to grow as the scale of the Town increases.

In tandem with the targeted population growth of approximately 8,000 additional people expected to reside in Letterkenny by 2040, the National Planning Framework (Ireland 2040) anticipates that employment growth will occur at a ratio of approximately 2:1 (people to jobs), this will equate to (a minimum) additional 4,000 workers employed in the Town over the next 15-20 years. In order to ensure this expansion is realised, it will be necessary to secure adequate provision of zoned land for a mix of enterprise and employment uses.

(i) General Employment.

(ii) Commercial Use.

(iii) Established Employment use.

(iv) Town Centre / Retail.

Employment growth in Letterkenny has continued apace over the last decade.

In addition to expanded retail, and service employment. The emergence of the ‘Letterkenny Cluster’ in ICT includes multi-national and indigenous companies. This cluster includes Sita, Kirchoff, Optibelt, Pramerica, Zues, Optum, United Health. Parmerica alone employ over 1,400 staff, and there will be scope in the coming years to expand this cluster, with Donegal County Council, IDA & Enterprise Ireland the primary stakeholders tasked with delivering further sustainable employment for the North West Region.
The targeted Area’s for General Employment will include additional lands adjacent to and within the IDA Business Park along the N-56 Link, and the former Unifi lands at Kiltoy / between Carnamuggagh / Lisnenan. 

The Mountain Top (Pinehill) supports approximately 40 business operators at present, and there is scope to introduce incremental environmental improvements which could enhance the general appearance of the area, and better separate pedestrian, and vehicle users.

4.2. RETAIL:

Letterkenny functions as County Donegal’s primary retail and shopping destination. The Retail area within Letterkenny can be summarised in a number of zones:

- The traditional Town Centre:
- Paddy Harte / Loop Road Retail Park.

A multi-purpose open / civic amenity space within the heart of the Town (aside from Market Square) would assist in helping the balance struck between vehicles, and pedestrians / cyclists, it would also encourage additional uses relating to events / activities.

In addition to the above, the incremental improvement of the Towns retail offer will include (i) Enhancing sustainable links between the 2 retail area’s. (ii) Providing public facilities at Letterkenny Retail Park, (iii) Targeted addressing of vacant retail floor space (iv) Emphasis on high quality urban design within the Town Centre, and on key strategic approach roads. Further detail in this regard will be set out in the forthcoming Letterkenny & Environs Local Area Plan. (LKLAP)

4.3. TOURISM

Letterkenny has been identified by Failte Ireland as a Destination Town (always on) owing to a number of factors.

(i) Bed Night Capacity (Approx. 4,200)
(ii) Proximity to Wild Atlantic Way (Donegal Headlands, including Discovery Points such as Malin Head & Fanad Lighthouse)
(iii) Proximity to Glenveagh National Park, Grianan of Aileach & Derryveagh Mountains.
(iv) Ability to offer attractions in its own right, including range of pubs, restaurants, and night-life.

It will be vital that given the significant growth in Tourist numbers visiting Ireland, and the potential to grow significantly the figures travelling on the Northern Half of the WAW, that Letterkenny continues to grow its offer as a Regional Centre of Scale to host, and support visitors across all of North Donegal. In order to do this, a number of Objectives need to be progressed in the short to medium term:
1. Provide sufficient zoned lands to ensure additional Hotels, and Tourist Accommodation can be accommodated within reach of the Town Centre.

2. To Provide a Regional Transport Hub within Walking Distance of the Town Centre, so as to ensure onward Journeys (WAW & Glenveagh NP etc.) are within easy reach of the majority of Hotel Accommodation.

3. To ensure the advancement of the Letterkenny – Burtonport Greenway Project, along the Disused Donegal Rail Line.

4. To further enhance Public Realm Offer within Letterkenny to enhance visitor experience.

5.0 – IMPLEMENTATION

Section 10 of the RSES sets out in further detail how the RSES will be reviewed, and implemented. Similarly, the Letterkenny RGCP will require an implementation panel, which periodically reviews the progress in terms of housing supply, infrastructure provision, as well as general well-being of the Town.


Following the adoption of the Regional Spatial and Economic Strategy (RSES), Donegal County Council will continue with the already commenced work towards a Letterkenny & Environs Plan to ensure consistency with the Regional Growth Centre Strategic Plan (RGC SP) and all other relevant provisions of the RSES. Work is also ongoing in relation to the NW City Region, and this will further inform the growth, and direction for Letterkenny over the next decade and beyond.

Building upon the RGC Strategic Plan set out in the RSES, the LAP will set the detailed framework for decisions on investment and development proposals in Sligo’s main urban area.

National Development Plan funding

As part of Project Ireland 2040, the Government announced the establishment of two new funding streams:

- the Urban Regeneration and Development Fund (URDF), which has an allocation of €2 billion in the National Development Plan (NDP) to 2027, primarily to support the compact growth and sustainable development of Ireland’s five cities and other large urban centres; and

- the Rural Regeneration and Development Fund (RRDF), which has an allocation of €1 billion in the National Development Plan (NDP) to 2027, primarily to provide investment to support rural renewal for suitable projects in towns and villages with a population of less than 10,000, and outlying areas.

Donegal County Council are already proactively working to garner maximum funding from the NDP, in order help achieve the 13 Key Strategic Objectives set out in the Letterkenny RGC Plan.

Vacant Site Register
The register lists vacant sites in Letterkenny, zoned for housing and regeneration purposes, which have remained undeveloped. The Register is a land activation measure with the ultimate aim of encouraging the development and regeneration of key lands.

Sites entered on the Register for Donegal in general, and specifically Letterkenny, are subject to the Vacant Site Levy provisions introduced under the Planning and Development Act. It is likely that Donegal County Council will have to apply this levy to encourage movement on key lands across the lifetime of the RGCP, and this should be reviewed annually.

**National Transport Agency (NTA) & Transport Infrastructure Ireland (TII):** Donegal County Council will continue to work with Transport Infrastructure Ireland (TII) to ensure that any roads-related infrastructural deficiencies are addressed through their ongoing capital investment programme, and with the National Transport Agency (NTA) to ensure ongoing engagement in relation to the provision of a Regional Transport Hub for Letterkenny.

**Irish Water investment:** Given the Donegal County Council will continue to work with Irish Water to ensure that any water and wastewater infrastructural deficiencies are addressed through the ongoing Irish Water capital investment programme.

**Potential Delivery Constraints**

The implementation of the Lettekenny Regional Growth Centre Plan and the strategic targets, and critical infrastructure listed therein may (over the 20 year period) be occasionally be constrained by factors such as the economic climate, political support, allocated local authority funding and the availability of funding from diverse sources.

However, it is the intention of the NWRA and of Donegal County Council to exercise all legal powers to ensure that the strategic objectives are implemented.
Proposed insertion of NWSGP – Section 9.2 & 9.3

North West Metropolitan Area Spatial Planning

The North West Region of the Island of Ireland, centred on Donegal County Council and Derry City and Strabane District Council, is the fourth largest urban agglomeration on the island of Ireland; and is the only functional economic region of such scale on the island which experiences a national jurisdictional border.

It is well recognised across the island of Ireland that while the North West faces many challenges - not least because of its peripherality from Dublin and Belfast and associated lack of investment over many decades - this region is an untapped source of great potential - economically, socially and environmentally. It is widely accepted that the challenges can only be met, and the opportunities pursued, with a consistent and long-term approach to coordinating the development of the region.

This new strategic plan for the North West City Region Metropolitan Area, including the Regional Centre of Letterkenny, is central to that coordinated approach, complementing the regional priorities of the North West Strategic Growth Partnership (NWSGP). Building on the work of the Growth Partnership and its strategic action plan (July 2016), this plan represents the sub-regional integration of spatial planning, economic and community development and infrastructure.
investment as part of the Regional Spatial and Economic Strategy (RSES) for the Northern and Western Regional Assembly, which represents the operationalising of the National Planning Framework (NPF) at the level of the North West City Region (see Figure XXX).

The plan plays a key role in guiding future growth and investment across this trans-boundary, inter-jurisdictional City Region, offering local, regional and national governments the opportunity to take a high-level, and long-term strategic approach, to the sustainable growth of the North West City Region.

The North West City Region

The North West region comprises Donegal County Council and Derry City and Strabane District Council areas covering an area of 2,394 square miles. This Metropolitan Area region is defined by the spatial influences of Letterkenny-Derry~Londonderry-Strabane. This functional urban area is characterised by a dense concentration of population, employment, service provision including transport, education and healthcare in this North West region

The population of the Metropolitan Area (see Map XXX) is 193,106 people while the wider North West City Region and its functional territory is home to over 350,000 people. The region is home to over 35,000 third level students. Of the current population of working age (16+), 39% have a Level 3 or above qualification. When apprenticeships are added to this, this increases to 43%.
The City Region is further defined by its rich tourism, culture and heritage offerings, industrial history, breath-taking scenery, its robust maritime tradition, the entrepreneurial spirit and creativity of its people, and its strong sense of community. In recent years, the councils have strengthened their shared approach to the effective development of these shared assets to the benefit of the region as a whole and, indeed, the all-island economy.

**Strategic Vision for the North West City Region**

Drawing from these core policy documents, the strategic vision for this Strategic Plan as it relates to both the North West City Region Metropolitan Area and the Letterkenny Regional Centre is:

*By 2038, the North West City Region Metropolitan Area and Letterkenny Regional Centre will be Connected, Vibrant, Resilient and Inclusive.*

This Plan’s vision centres on managing spatial change and improving people’s quality of life. Ultimately, this is about creating a good quality place to live, work and socialise via processes of place-based leadership and place-making. To achieve this vision, there is a recognised need to work collectively and in an inter-disciplinary manner.

**How will this be achieved?**

Delivering this vision requires collaborative leadership and working with partners across the private, public and third sector. The achievement of this strategic vision shall be made possible through the new collaborative structures that have been co-designed by both Donegal County Council and Derry city and Strabane District Council and which place a strong emphasis on the principles of place-based leadership, namely:

- the North West Strategic Growth Partnership involving senior Central Government Officials, both North and South, and
- the North West Regional Development Group involving senior management and elected representatives from both Council areas.

In addition, those positive working relationships that have been nurtured through the Local Community Development Committees (LCDCs) and the Higher and Further Education bodies to facilitate delivery of the key objectives of their Memorandum of Understanding (MOU) will be capitalised on.

**Key Strategic Outcomes:**

This strategic plan is centred on four key strategic outcomes – closely aligned with the national strategic outcomes and priorities of the *National Planning Framework (NPF)* and the eight strategic aims of the *Regional Development Strategy (RDS) 2035*. Those outcomes are:

- Building Inclusive and Compact Places;
- Investing in Connected and Accessible Places;
• Planning for a Vibrant Economy and Nurturing Communities; and
• Creating Resilient Places and Low-Carbon Infrastructure.

Under this strategic plan, new developments will, to the extent possible, contribute towards the creation of high quality places across the North West City Region, taking account of the Placemaking Principle. Under the principles of place-making, development proposals should be based upon a design led and participative process and should seek to deliver on the six qualities of place – namely, distinctive, safe and pleasant, welcoming, adaptable, resource efficient and easy to move around and beyond. The following objectives shall form a framework for this.

Objective NWMA1: Build Inclusive and Compact Places by:
   a) Planning for Inclusive Communities through regional cooperation and collaboration, to support the wider economic and social development agendas of the region and integrating health and wellbeing outcomes across all activities, ensuring that spaces are made available for community use;
   b) Accommodating Growth and Delivering Housing through compact growth where housing opportunities are close to schools, community facilities, health facilities, shopping, and employment; Prioritising the (re-)use of existing under utilised land and buildings, and other infill opportunities.
   c) Accessing Quality Services by maximising the use of transport and digital infrastructure to ensure people can access quality education and health services, building on the quality health and education infrastructure that exists on a cross-border basis and building more shared services and nurturing greater collaboration between actors and agencies in the co-design of new services.
   d) Valuing Cultural Heritage by creating appealing places through attractive and imaginative building design, street layout, civic space and public realm design; Developing new offerings in support of existing ventures in the tourism sector, such as greenways, walking trails and other inter-urban connections, based on the wealth of natural and cultural heritage assets and providing links to the Wild Atlantic Way and the Causeway Coast.

Objective NWMA 2: Investing in Accessible and Connected Places through:
   a) Investing in Transport Infrastructure encouraging Donegal County Council, Derry City and Strabane District Council and transport providers to work together to deliver programmed and future investment for strategic internal and external transport improvements. This to include consideration of cross-border connectivity – with a particular emphasis on provision of high quality Ten-T routes, maximising the level of accessibility to the urban core for all sectors of the community and all abilities, with a focus upon supporting a modal shift to walking, cycling, public transport, whilst embracing disruptive technologies to augment the shift to electric vehicles and other modes of transport.
   b) Encouraging active travel with a clear focus on place building and connectivity and promoting active mobility through soft measures including information and awareness raising campaigns to complement hard investments in routes and support activities, including activity-based recreation resources;
   c) Strengthening Digital Infrastructure by supporting the expansion and investment in third-level education and leveraging cross-border knowledge networks to strengthen access to skills and talents that support a digital economy, nurtures entrepreneurship, anticipates and responds to the demand for innovative services that are socially inclusive, attractive and supportive of the local workforce, and contributes to quality public realm.
Objective NWMA 3: Planning for a vibrant economy through:

a) Fostering Enterprise and Innovation by identifying the critical linkages between place-making and business investment, utilising the North West Strategic Growth Partnership in realising the economic potential of the Region in priority areas ensuring they are supported by our third level institutes and our R&D institutions of excellence and that further spaces are developed to nurture and catalyse the region’s most innovative entrepreneurs with the area’s strong network of experienced business leaders and cutting edge research and development institutions;

b) Nurturing the rural economy through protecting and promoting the sense of place and culture and the quality, character and distinctiveness of the rural landscape, whilst facilitating the appropriately-scaled development of rural enterprise initiatives, including the appropriate development of tourism, delivering business start-up programmes and development support to rural communities experiencing economic disadvantage, whilst also meeting appropriate rural housing need having due regard to all material considerations.

Objective NWMA 4: Create Resilient Places and Low-Carbon Infrastructure by:

a) Managing Natural Resources through adhering to the principles of the circular economy, monitor air quality through use of smart technologies such as sensors, with the overall aim of improving air quality and to protect local ecosystems through the management of our natural capital.

b) Transitioning to a Low Carbon Economy through a presumption against development in areas vulnerable to flooding and rising sea levels, continuing to assess the probability of risk from all sources of flooding, and working with relevant stakeholders in both the assessment and delivery of any mitigation responses required; Furthermore, pursue the generation of renewable energies and their local applications through, for example, green infrastructure planning, innovative design solutions, the promotion of energy efficient buildings and homes.

c) Diversifying Energy Resources by promoting and facilitating the development of the wider North West region as a Centre of Excellence for renewable energy and innovation and establishing a sustainable energy strategy for the City Region that pursues continued investment in the resilience and security of electricity networks and infrastructure, and the development of a diverse energy portfolio, harnesses the expertise of technological research and training among the region’s institutions of higher education, grows the development of a skilled workforce in all aspects of energy generation including linking employment opportunities in the emerging renewable energy field to workers displaced from other economic sectors.