



WDC Insights

*providing insights on key issues for
the Western Region of Ireland*

Ireland 2040 – Our Plan: National Planning Framework

Summary of Western Development
Commission Submission



March 2017

Western Development Commission Submission

The Western Development Commission (WDC) welcomes the publication of the [Ireland 2040 Our Plan: Issues and Choices](#) consultation document for the National Planning Framework (NPF). This document presents a summary of the detailed submission made by the WDC. It sets out:

1. Key issues for the National Planning Framework
2. A summary of the key points of the WDC's answers to the consultation questions

The [WDC](#) is a statutory body established by government to promote, foster and encourage economic and social development in the Western Region (Donegal, Sligo, Leitrim, Roscommon, Mayo, Galway and Clare). It operates under the aegis of the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs (DAHRRGA).

The WDC submission considers the issues raised in the NPF consultation document from the perspective of the Western Region, the needs of the region, the opportunities its development presents for Ireland's economy and society as a whole and the choices, investments and policy required to achieve regional growth and resilience.

Key Issues for the National Planning Framework

What should the NPF achieve?

- The National Planning Framework (NPF) provides Ireland with an opportunity to more fully realise the potential of all of its regions to contribute to national growth and productivity. **All areas of Ireland, the Capital and second tier cities, large, medium and small-sized towns, villages and open countryside, have roles to play both in the national economy and, most importantly, as locations for people to live.**
- While spatial planning strives for ideal settlement or employment patterns and transport infrastructure, in many aspects of life change is relatively slow; demographics may alter gradually over decades and generations and, given the housing boom in the early part of this century, many of our existing housing units will be in use in the very long term. If the NPF is to be effective it must focus on **what is needed, given current and historical patterns and the necessity for a more balanced pattern of development.**
- **To effectively support national growth it is important that there is not excessive urban concentration** "Either over or under [urban] concentration ... is very costly in terms of economic efficiency and national growth rates" (Vernon Henderson, 2000¹). Thus it is essential that, through the NPF, other cities and other regions become the focus of investment and development.

Developing Cities

- As the NPF is to be a high level Framework, in this submission the WDC does not go into detail by naming places or commenting on specific development projects, as these will be covered by the forthcoming Regional Spatial and Economic Strategies (RSES). **The exception to this, however, is in relation to the need for cities to counterbalance Dublin. In this case we emphasise the role**

¹ <http://www.nber.org/papers/w7503>

of Galway and the potential for Sligo to be developed as the key growth centre for the North West.

- The North West is a large rural region and Sligo is the best located large urban centre to support development throughout much of the North West region. With effective linkages to other urban centres throughout the region and improved connectivity, along with support from regional and national stakeholders, **Sligo can become a more effective regional driver, supporting a greater share of population, economic and employment growth in Sligo itself and the wider North West region.**

Developing Towns

- While the NPF is to be a high level document and the focus is largely on cities **it is important not to assume that development of key cities will constitute regional development. All areas need to be the focus of definite policy**, and the NPF should make this clear.
- While cities may drive regional development, other towns, at a smaller scale, can be equally important to their region. **Recognising this is not the same as accepting that all towns need the same level of connection and services.** It is more important to understand that the context of each town differs, in terms of distance and connectivity to other towns and to the cities, the size of the hinterland it serves and its physical area as well as population. Therefore their infrastructure and service needs differ.
- Towns play a central role in Ireland's settlement hierarchy. While much of the emphasis in the NPF *Issues and Choices* paper is on cities and their role, **for a large proportion of Ireland's population small and medium-sized towns act as their key service centre for education, retail, recreation, primary health and social activities.** Even within the hinterlands of the large cities, people access many of their daily services in smaller centres. The NPF needs to be clear on the role it sees for towns in effective regional development.

Rural Areas

- **Rural areas provide key resources essential to our economy and society.** They are the location of our natural resources and also most of our environmental, biodiversity and landscape assets. They are places of residence and employment, as well as places of amenity, recreation and refuge.
- They are already supporting national economic growth, climate action objectives and local communities, albeit at a smaller scale than towns and cities. But **a greater focus on developing rural regions would increase the contribution to our economy and society made by rural areas.**
- **The key solution to maintaining rural populations is the availability of employment.** It is important that the NPF is truly focused on creating opportunities for the people who live in the regions, whether in cities, towns or rural areas.

Employment and Enterprise

- In the *Issues and Choices* paper a **narrow definition of 'job', 'work' and 'employer' as a full-time permanent employee travelling every day to a specific work location seems to be assumed. This does not recognise either the current reality of 'work' or the likely changes to 2040.** Self-employment, the 'gig' or 'sharing' economy, contract work, freelancing, e-Working, multiple

income streams, online business are all trends that are redefining the conceptions of work, enterprise and their physical location.

- If the NPF mainly equates ‘employer’ with a large IT services or high-tech manufacturing company, many of which (though by no means all) are attracted to larger cities, **then it will only address the needs of a small proportion of the State’s population and labour force.**
- Similarly the NPF must recognise the need to enable and support the diversification of the Irish economy and enterprise base. It must provide a support framework for indigenous business growth across all regions and particularly in sectors where regions have comparative advantage.

Location Decisions

- While job opportunities are a critical factor in people’s decision of where to live, they are by no means the only factor. Many other personal and social factors influence this decision such as closeness to family (including for childcare and elder care reasons), affordability, social and lifestyle preferences, connection to place and community.
- Many people have selected to live in one location but commute to work elsewhere or, in some cases, e-Work for a number of days a week. **The NPF needs to recognise the complexity of reasons for people’s location decisions in planning for the development of settlements.**

Infrastructure

- New infrastructure can be transformative (the increase in motorway infrastructure in recent decades shows how some change happens relatively quickly). Therefore it is essential that we carefully consider where we place new investments. **To do so, capital appraisal and evaluation methods determining the costs and benefits of different investment projects need to be re-examined** if we are to move from a ‘business as usual’ approach.
- **Investment in infrastructure can strongly influence the location of other infrastructure with a detrimental impact on unserved locations.** The North West of the country is at a disadvantage compared to other regions with regard to motorway access. This situation will be compounded if investment in rail is focused on those routes with better road access (motorways) in order for rail to stay competitive, or if communications or electricity networks are developed along existing motorway or rail corridors.
- The WDC believes that the **regional cities can be developed more and have untapped potential, however better intra-regional linkages are needed.** The weaker links between the regional centres – notably Cork to Limerick and **north of Galway through to Sligo and on to Letterkenny, are likely to be a factor in the relatively slower growth of regional centres in contrast to the motorway network, most of which serves Dublin from the regions.**

Climate Change

- For the future, the need to move to a low carbon, fossil fuel free economy is essential and needs to be an integral and much more explicit part of the NPF. The National Mitigation Plan for Climate Change is currently being developed, **and it is essential that actions under the NPF will be in line with, and support, the actions in the Mitigation Plan.**

How should the NPF be implemented?

- While much of the role of the NPF is strategic vision and coordination of decision-making, **in order for the Framework to be effective it is essential that the achievement of the vision and the actions essential to it are appropriately resourced.** The *Issues and Choices* paper does not give a detailed outline of how the NPF implementation will be resourced, except through the anticipated alignment with the Capital Investment Programme.
- It should be remembered that **policy on services and regional development is not just implemented through capital spending but also through current spending and through policy decisions with spatial implications (such as those relating to the location of services).** Therefore it is essential that other spending, investment and policy decisions are in line with the NPF rather than operating counter to it.
- While the NPF is to provide a high level Framework for development in Ireland to 2040, it seems this Framework is to be implemented at a regional level through the RSES. The Framework and the Strategies are therefore interlinked yet **the respective roles of the NPF and the RSES are not explicit and so it is not evident which areas of development will be influenced by the NPF and which by the RSES.**
- In order to ensure that the NPF is implemented effectively it is important that there is a **single body with responsibility for its delivery and that there is a designated budget to help achieve its implementation.**

Summary of Answers

A summary of the key points made in response to the consultation questions is provided here.

People's Health and Well-Being

It is important that, when investments are made in our living environments, the impacts on health and lifestyle are considered. **The place we live should help us to develop and sustain healthy active lifestyles and improve our quality of life rather than promoting stressful or sedentary patterns.**

This consideration of health and well-being should occur in all settings, urban and rural, and should take account of the needs of the ageing population. There should also be a focus on reducing stress that can be brought about by poorly planned built environments.

A Place-Making Strategy

Our Capital, Cities and Towns

The WDC believes that to promote more effective regional development, **the role of second tier cities is critical** and we agree with the need for a 'significantly strengthened role for a next tier of cities and their broader regions' (section 4.1.8). Galway is central to the success of the West region.

The WDC strongly believes that there is a **very strong case to also support Sligo as a key urban centre to support development in the North West**. In an all-island context, the continued growth of **Letterkenny, and strengthening its linkages with the City of Derry**, is important for mitigating the negative impact of Brexit on border areas and communities.

Improved connectivity between the four regional cities and from Galway to Sligo and Letterkenny is critical to ensuring that these centres can develop as strong regional complements to Dublin. Linking these centres more effectively is also a key part of the **Atlantic Economic Corridor (AEC)** proposal.

While the four regional cities are important, **some towns away from larger centres, despite smaller populations, effectively play the role of regional cities**. These towns need to be considered as such and the appropriate investments should be made to allow them to continue to do this effectively. In the North West, Sligo is a clear example of a town with the potential to play the role of the regional city. In the Western Region there are five towns with a population of more than 10,000, which in the context of the region, are significant centres. These towns are important as drivers of their local economies and in servicing their rural and remoter hinterlands. Their function (and that of similar towns in other regions), needs to be clearly addressed by the NPF.

Achieving effective regional development, not only to build up cities, but for all areas of Ireland, requires substantial changes to administrative and governance structures. Internationally, cities, towns and regions that have made significant progress have been **characterised by a strong local coalition of the public, private and community sector and considerable autonomy in decision-making and, crucially, in raising local finance**. The resource capacity, human, financial and physical of Local Authorities varies substantially across Ireland. Effective regional development will require strengthening Local Authority structures and the capacity to raise local finance.

The three Regional Assemblies, through the Regional Economic and Spatial Strategies (RES), have a key role in providing a structure to facilitate alliances and collaboration at a regional level and to

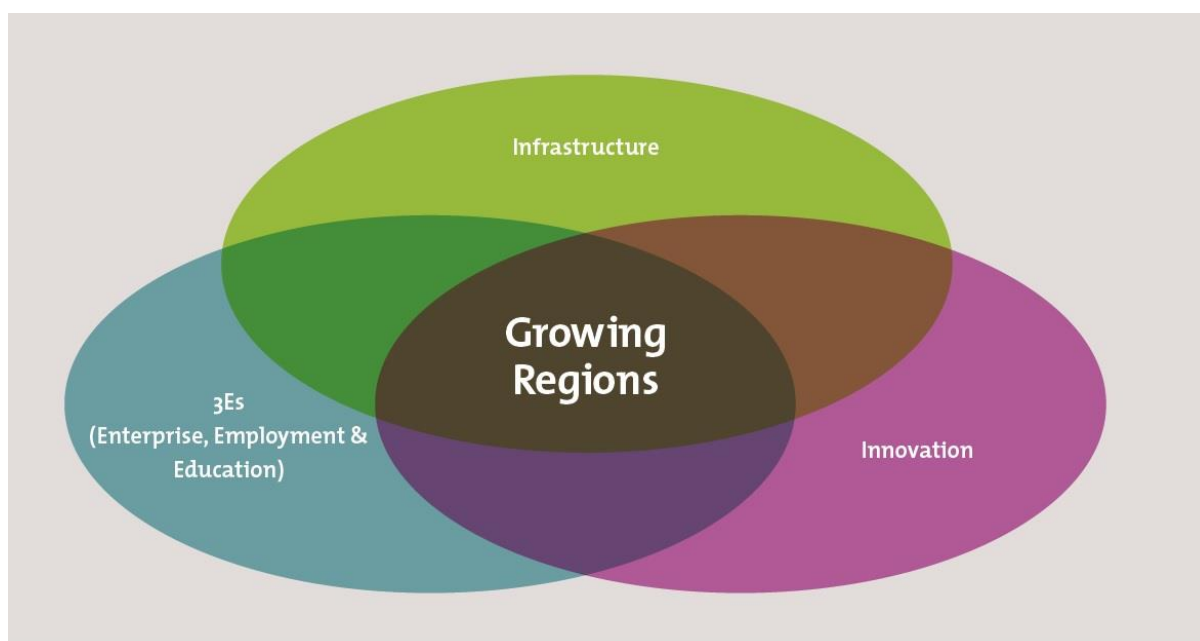
address strategic issues which cross Local Authority and regional boundaries. The development and implementation of the three RSEs should form a central focus for collaboration to deliver effective regional development.

Opportunities for our Regions

The Western Region has a number of key regional assets which form part of its ‘value proposition’ as a location to live, work, do business and visit. Other regions have their own unique package of assets. **Effective regional development requires harnessing these regional assets.** For the Western Region they include:

- Quality of life
- Attractive natural environment
- Strength in manufacturing
- Strength and vibrancy of Galway city
- Abundant renewable energy potential
- World-leading medical technology cluster
- A number of internationally significant tourism locations
- Two international airports
- Extensive and ‘green’ food production system and marine resource
- High level of self-employment and self-motivation
- Strong creative sector including links with arts, culture and heritage

The central aim of regional policy and the NPF should be to provide the conditions for regions to grow and realise their full potential, based on their regional assets. **Infrastructure, the ‘3Es’ (Enterprise, Employment and Education) and Innovation are the key levers for effective regional development. When they work together they drive regional growth.** Each has a distinctive role, and needs its own policy focus, but they are most effective when addressed through an integrated policy approach.²



² WDC (2010), Why care about regions? A new approach to regional policy <http://www.wdc.ie/wp-content/uploads/reports-WDC-Policy-Briefing-Why-care-about-regions-July-2010.pdf>

One important element in realising regional opportunities is strengthening human capital. Increasing human capital at a regional level has three key purposes: to provide a skilled labour force; to improve employability and life skills for individuals; and to stimulate entrepreneurship. All three must be seen as priorities when developing regions' human capital.

Greater collaboration among education and training institutions at all levels and alignment of education and training provision with areas of regional strength and future employment growth, as well as provision of transferable and entrepreneurial skills, will be most effective in enhancing regions' human capital.

The primary source of funding for achieving regional development will be the National Exchequer. **The only way that the NPF can be successfully implemented is for Departmental and State and Semi-State Agency expenditure decisions and allocations, including the Capital Plan, to be aligned with the spatial priorities outlined in the NPF and the three RSES.** In the absence of alignment of Exchequer funding with the NPF and RSES, they cannot succeed. Other sources of funding for regional investment should be seen as supplementing, rather than replacing, National Exchequer allocations.

Public investments of a 'national' nature which are mainly located in the Capital contribute strongly to its economic growth and primacy. The relocation of some of these 'national' investments outside of Dublin and/or decisions to locate new 'national' investments outside the Capital, would help ease congestion, bottlenecks and contribute to the counterbalance to Dublin's growth sought by the NPF. **Public investment can either reinforce the 'business as usual' scenario or be used as a tool to achieve the priorities of the NPF for more effective regional development.**

The Potential of Rural Ireland

Rural areas provide key resources essential to our economy and society. They are the location of our natural resources and also most of our environmental, biodiversity and landscape assets. They are also places of residence, employment, places of amenity, recreation and refuge.

Rural areas are already supporting national economic growth, climate action objectives and the development of local communities but a greater focus on developing rural regions would increase the contribution to our economy and society made by rural areas.

Rural communities can face particular challenges due to their age profile, the structure of their economies and a lack of access to quality infrastructure and new technologies. It is important to recognise that **all rural areas and rural communities are not the same.** There are differences in remoteness and accessibility, the influence of neighbouring urban centres and their natural resource assets and access to infrastructures.

The solution to maintaining rural populations is common to all areas however; the availability of employment. As migration is the key cause of rural population decline, the focus should be on enterprise and employment opportunities in rural areas. Investing in upskilling lower skilled workers in rural regions can have an important impact on regional economic development. It is important that the **NPF is truly focused on creating real opportunities for the people who live in the regions, whether in cities, towns or rural areas,** and that the NPF should achieve improvements in people's quality of life as well as their economic and social opportunities.

Alongside issues of outmigration and dependency, some rural areas also face infrastructure and service deficits. Many of our towns and villages have suffered from a lack of investment in the infrastructure which connects them locally, and which could improve their capacity to provide services and maintain and attract enterprise. **Where services are not provided locally, there should be a clear means of access to services in other centres.**

Towns and villages are already providing employment and services for people in their area and are active centres of local economic activity. Indeed while some are facing difficulties, others are thriving and providing many opportunities for people to live, work and do business. **Towns have a key role in maintaining the social fabric of rural areas in Ireland while also making important contributions to the local economy** even if this is on a small scale, dwarfed by that produced in a city. It is important to remember that scale of activity varies between more densely populated and less densely populated areas, but that even at a small scale towns and villages contribute to the resilience of our rural areas.

Ireland in an All-Island Context

The all-island context is important for effective regional development in the Western Region. Donegal in particular is closely integrated with Northern Ireland, spatially and economically and **the North West Gateway initiative of Letterkenny and the City of Derry should be a key strategic priority under the NPF.**

The all-island structures which were established as a result of the Good Friday Agreement have made considerable progress in developing a joined-up approach to many all-island issues, however more needs to be done to effectively harness the economic and other opportunities that exist on a cross-border basis. **Mitigating the impact of Brexit on access to services, cross-border commuting, trade, transport access from Donegal to Dublin and joint infrastructure planning must be a core objective of the NPF.**

Integrated Land and Marine Development

Development of our marine territory is a key example of how the potential of an existing resource can be used to drive a region's development. The development of our coastline and marine resource are key areas of opportunity to 2040 and must take place in tandem with a strong emphasis on the protection and preservation of our coastline, and maritime communities.

Our extensive ocean resource and the existence of research infrastructure and a research-orientated FDI and SME base can be used to make the blue economy integral to the whole economy while preserving the ecological stability of our marine environment. Its development requires an integrated approach which can be, in part, provided through the NPF.

Ireland's Unique Environment – Sustainability

The natural environment is a key asset of the Western Region and therefore it needs to be protected, and enhanced, both for its existence value to the economy and society and also for the potential it brings to local economic development.

There is significant potential to make the most of the **opportunities provided by trends in technology development, the growth of services employment, a move to more varied working**

hours, and greater remote and home working opportunities as well as incentives for enterprises to offer different work arrangements, to contribute to reducing carbon emissions.

It could be argued that better spatial planning, with more concentration in population centres will provide more concentrated transport demand which can be better served by public transport with lower per capita emissions. However, should there be a significant switch to electric vehicles, and if electricity generation is mainly renewable by 2040, then rural emissions will fall considerably.

Equipping Ireland for Future Development – Infrastructure

Historically, **investment in infrastructure networks in particular have had the effect of promoting the development of the Capital, rather than the other centres**, with the road and rail networks developed in a radial fashion connecting all to Dublin, with little connectivity between the other centres. This has supported the growth of Dublin and constrained economic activity between the other centres.

The nationally important infrastructure projects under the NPF will be those projects that will help support the objectives of the NPF and associated RSEs. If it is accepted that the spatial pattern of development which is described as ‘business as usual’, is not desirable, then an alternative approach is required. **If the second tier cities, other larger urban centres and rural areas are to play a greater role in the economic and social development of the country, these centres will need to be supported through investment in infrastructure.**

This will require a change to the conventional appraisal and evaluation methodologies used (business as usual), which are typically used to determine what projects are given the go-ahead. **The traditional cost benefit approach will naturally favour the larger and often largest population centres as the impacts are likely to be felt by a greater number**, wherever the project is being delivered. The impact on the wider spatial balance of the country and the extent to which the investment is supporting the NPF goals, will need to be factored in. There is a need for a CBA methodology which accords the NPF/regional development goals and objectives a higher value.

National roads

The priority national primary road projects that need to be delivered include:

- N4 (Collooney–Castlebaldwin; Carrick-on-Shannon–Dromod; Mullingar–Longford)
- N5 (Westport–Turlough; Ballaghaderreen Bypass–Scramogue)
- N6 (Galway City Transport incl bypass)
- N17 (Tubbercurry Bypass; Collooney–Tubbercurry)
- N13/N14/N15 (Stranorlar–Derry), N15 (Lifford–Stranorlar)
- N16 (Sligo–Glencar; Glencar–Glenfarne)

National secondary routes are critical for inter-regional linkages and ensuring access from rural areas to services and employment in larger urban centres.

Regional and local roads

It is essential to ensure that **communities isolated by distance or weak national roads have improved quality of road access to local towns, their key regional city and to ports and airports. Key routes from the existing motorway and national road network need to be prioritised in the future in line with the NPF and the RSEs.**

It is important that these local and regional roads are maintained to a reasonable standard according to their traffic load for local importance. It is essential that there is a planned cycle of maintenance implemented by the Local Authorities who manage these roads.

Rail

The focus of rail transport policy should be on providing for a rail network and services that can support a greater modal share of travel journeys, due to its better record environmentally. The WDC believes that **proposals for investment in the electrification of some lines should include the lines serving Galway and Sligo** as regional centres with a need to improve accessibility.

The WDC believes that generally across lines serving the Western Region, **service levels, the fare structure and supports to improve the attractiveness of rail (such as better car parking facilities) are needed to increase patronage levels.**

The Government committed to a feasibility study in the Capital Plan 2015 designed to identify what supports are required/possible to **increase the share of rail freight**. This scoping study and recommendations need to be actioned as soon as possible.

Bus

As the most important mode of public transport, and in the context of an ageing population and the need to reduce carbon emissions, modal shift from car to bus transport must be central to the NPF and RSEs long term planning perspective. Increased frequency of services, improved integration and quality bus corridors will all be needed to increase modal shift to bus.

The WDC believes that the **NPF should fully support continued public subvention of bus services in less populated, rural areas through PSO services and the Rural Transport Programme** as a key public service for rural residents, including allowing them to access services in urban areas.

Air

There is an increasing focus on all airports to be commercially independent. The regional Local Authorities have taken an equity shareholding in Ireland West Airport Knock, illustrating the benefit of the airport to the regional economy.

EU Guidelines recognise that airports with fewer than 1 million passengers per annum may face difficulty and, subject to a case-by-case assessment, an aid rate in excess of 75% (up to 90%) may be justified in exceptional circumstances, subject to EU approval. **Government needs to support Ireland West Airport Knock in seeking approval for a higher aid rate.** Investment is needed to support greater surface connectivity to Shannon and Ireland West Airport Knock with improvements to the road network a priority.

Electricity

It is important that investments in electricity network reinforcement are made, which will both allow for the transmission of significant amounts of renewable energy from the region, as well as providing high quality electricity infrastructure for enterprise in the region (both existing and potential).

The WDC regards the **provision of quality electricity transmission and distribution networks as important elements of the infrastructure required to underpin the economic development of the**

region. A commitment to investment in energy infrastructure is important to achieving regional development goals through the NPF.

Gas

The focus of natural gas infrastructure investment in the NPF should be the North West and in particular the need for natural gas infrastructure in towns in counties Donegal, Sligo, Leitrim and Roscommon. The WDC believes it is important that there is a commitment to improve regional energy infrastructure, to examine the benefits of natural gas infrastructure and to invest in this infrastructure.

Lack of gas infrastructure may become a disincentive to investment, reducing a region's competitiveness and increasing existing disparities. The NPF needs to be clear about the requirement for natural gas infrastructure in the North West, in particular in the larger towns of Sligo and Letterkenny.

Broadband

To ensure the National Broadband Plan can deliver on planned future EU target speeds as well as the current commitments, it is imperative that **future proofed infrastructure** is used in the deployment.

The Implementation Group of the mobile phone and broadband taskforce needs to ensure that actions to provide immediate solutions to the broadband/phone coverage deficit in rural Ireland are implemented.

Use of existing infrastructure

To make the best use of existing infrastructure it would be important to **join existing networks together and complete 'unfinished sections'**. For example complete the improvements to the road network north of Tuam to ensure a high quality network to Sligo and Letterkenny.

When considering infrastructure needs, an efficient starting point is to identify and use existing available capacity. For example **there is capacity available for international air access at Cork, Shannon and Ireland West Airport Knock all of which have received significant state investment over many decades.** Improved services at these airports will reduce the need for local populations to avail of services at Dublin Airport which in turn will reduce journey numbers through an already congested Greater Dublin Area.

Enabling the Vision – Implementing the National Planning Framework

In order to ensure that the NPF is implemented effectively it is important that there is a **single body with responsibility for the delivery of the NPF** and that there is a designated budget to help achieve the implementation of the Framework.

Alongside this it is essential that **other spending, investment and policy decisions are taken in line with the NPF** rather than operating counter to it. Finally there needs to be a **clear relationship between delivery of the NPF and of the RSES in each of the three regions.** This relationship needs to be made more explicit in the draft NPF.