

11 April 2011

Mr Eoin Bennis
Department of the Environment, Heritage &
Local Government
Custom House
Dublin 1

Western Development Commission (WDC) submission to the *Spatial Strategies on the Island of Ireland: Framework for Collaboration* consultation document

Dear Mr Bennis

The Western Development Commission (WDC) welcomes this opportunity to input to the above consultation. The WDC is a statutory agency with responsibility for promoting economic and social development in the Western Region¹ of the Republic of Ireland, which includes two counties bordering Northern Ireland. The WDC has previously made submissions to the consultations on the National Spatial Strategy (NSS) and its Update, as well as the recent reviews of Regional Planning Guidelines (RPGs). These submissions are available at www.wdc.ie and cover many issues of relevance to the current consultation process.

The WDC welcomes the development of a framework to achieve collaboration on spatial strategies on the island of Ireland. As a regional agency with responsibility for an area bordering Northern Ireland we are well aware of the extent to which spatial planning and regional development issues apply ‘cross-border’. For example research we have conducted on travel to work patterns and labour catchments in the Western Region, clearly shows strong cross-border labour flows. Indeed within county Donegal, the Derry/Londonderry labour catchment was found to be the second largest after Letterkenny.²

The WDC’s views on the issues raised in the consultation document are set out below. Paragraph numbers from the document will be used where specific references are made:

- The role and full potential of smaller centres and rural areas, including as locations for enterprise and employment, should be fully reflected in the Framework for Collaboration. Such areas are already important employment locations (in 2006 38.7% of those at work in the Western Region were working outside centres of 1,000 persons). These areas have been hit hard by job losses from the construction, manufacturing, agriculture and local services sectors. Facilitating sustainable job creation based on the assets and strengths of smaller centres and rural areas, which include but are not limited to natural resources, should be fully supported under the Framework for Collaboration.

¹ Counties Donegal, Sligo, Leitrim, Roscommon, Mayo, Galway and Clare

² WDC, 2009, Travel to Work and Labour Catchments in the Western Region: A profile of seven town labour catchments

- The WDC fully accepts the importance of connectivity (1.9) to regional development and since its establishment has argued for improved transport, energy and telecommunications connectivity for the Western Region. However we feel it is also important that the Framework acknowledges that improved connectivity for certain areas has knock-on impacts on those areas that remain relatively ‘unconnected’. Such areas can become increasingly marginalised as connectivity increases elsewhere and comes to be taken for granted. For example the lack of natural gas connectivity in the North West reduces its attractiveness for inward investment by certain industries. The Framework needs to address issues for areas with poor connectivity.
- Given the complexity of regional development, the Framework needs to cover a broad range of issues. To this end, a more detailed summary of the priorities of the NSS Update (2.9) may be useful. Specifically the list of planning and investment priorities identified on page 43 of the NSS Update. These appear to be consistent with the priorities of Northern Ireland’s Regional Development Strategy (2.2), and may provide a more comprehensive picture of the objectives of the NSS.
- In terms of the identification of the principal cities on the island of Ireland (Diagram 3) it may be useful to provide some indication of the varying scale of these cities and therefore their current capacity to play a wider role in their respective regions. The four largest cities (Dublin, Belfast, Cork and Derry) are referred to specifically but not the remaining four cities shown in the map. Sligo is the only one of the ‘new’ gateways, first identified in the NSS, which is included in this map.³ The NSS recognises that the newer gateways require greater support to achieve their regional development potential and it would be useful for this to be reflected in the Framework, in particular given the potential of Sligo’s cross-border linkages with Enniskillen, as well as Letterkenny’s links with Derry.
- Beyond the principal cities, the consultation document refers to ‘other cities and main towns’ as being the optimum locations for employment, health and education services (3.7). However it is not specified if this refers solely to the gateways and hubs identified in the NSS (and their equivalents in the RDS) or if it also includes other towns such as county towns.
- Given current increasing levels of emigration, it may be useful to refer to this in the discussion of future population (3.10). In the year between April 2009 and April 2010 the Border region experienced an overall decline in its estimated population (-0.26%), and was one of only three regions in the Republic of Ireland where this occurred (West and Dublin).⁴ Given the employment and enterprise structure of the Border region (with the exception of the Dublin-Belfast corridor), and the pattern of recent job losses in construction, manufacturing, retail and local services, this area of the island may be more vulnerable to rising emigration, a fact that should be acknowledged in the Framework.
- People’s choice about where to live (3.14) depends on personal preference and stage in their life cycle, as well as on jobs, facilities and services as listed in the consultation document. Acknowledgement of the personal choice motivation for housing decisions should be incorporated in the Framework, in addition to the other factors.

³ The other ‘new’ gateways of Dundalk, Athlone-Tullamore-Mullingar and Letterkenny (linked with Derry) are not shown.

⁴ CSO, 2010, Population and Migration Estimates, April 2010

- The WDC has undertaken analysis of the employment and unemployment challenges of the Western Region⁵ and is in agreement with many of the views expressed in the consultation document (3.20). However we feel it would also be important for the Framework to acknowledge that growth in ‘graduate hungry service sector jobs’ will not provide a full solution to the unemployment crisis, particularly for the roughly two-thirds of people aged 15-64 years who do not have a third level qualification. Job losses have been concentrated among those with lower education levels and job creation in employment-intensive sectors which do not necessarily demand high qualifications e.g. tourism, elder care, call centres, will be critical to avoiding long term structural unemployment. Employment growth in such sectors should also be facilitated by the Framework.
- The support of rail freight should be included as a means of addressing transport congestion problems (3.33). The support of enterprise and employment growth closer to where people live will also help alleviate some of these issues, as would support for home working.
- It should be noted that in addition to the North South Interconnector for electricity mentioned (3.34) and the second planned North South interconnector, there are two other smaller electricity interconnectors (110kV) at Strabane-Letterkenny and Enniskillen-Corraclassy. While currently the purpose of these interconnections is to provide support to either system for certain conditions or in the event of an unexpected circuit outage, these have the potential in future to become more important with further integration of the electricity networks and should be recorded in the Framework. Developments in relation to electricity (3.36) are creating a more stable and secure *transmission* system for the island (rather than *distribution* system as stated). The map of the electricity network (Diagram 4) seems to be out of date in relation to recent developments of transmission lines in the Republic of Ireland. It is also mislabelled and incorrectly shows 400kV power lines in the South as 275kV, while also only showing wind farms of 5MW and over in the North but not showing those in the South. The lack of natural gas transmission infrastructure in the North West should be also be highlighted in the Framework (3.37).
- While there is a need to ensure that opportunities provided by access to high quality telecoms are exploited (3.38), it is also important to ensure that all areas have access to broadband. Some rural areas are still without any broadband access and detail of the Rural Broadband Scheme in the Republic of Ireland, to provide services to these areas, has yet to be announced. Broadband take-up continues to increase and there are ever increasing demands for higher capacity and faster broadband speeds. For optimum rollout, it is important to ensure there is collaboration on alternative technologies (3.39). There is also likely to be benefits in collaborating in order to deliver Next Generation Networks and fibre access to as many users as possible.
- From previous comments it will be clear the importance which the WDC attaches to enhancing the Western Region’s infrastructure. The North West in particular currently faces relatively significant infrastructure deficits in relation to motorway or even dual-carriageway access, natural gas infrastructure and direct international air access. The WDC believes that a coherent cross-border approach to closing this infrastructure gap

⁵ WDC, 2009, Work in the West: The Western Region’s Employment & Unemployment Challenge

(4.6), as well as investment in shared infrastructure (4.19), will be required to allow the North West, including its major urban centres, smaller towns and rural areas, to achieve its development potential and contribute fully to national growth.

- In addition to the established Dublin-Belfast, Derry-Letterkenny and Newry-Dundalk linked centres (4.7 and 4.8), it would be useful to also refer to the future potential of developing other cross-border links in the central border area e.g. Sligo-Enniskillen, and that the experience from current initiatives could be used to stimulate new partnerships.
- The WDC agrees with the critical importance of continued spatial analysis, based on harmonising and integrating key datasets on a cross-border basis (4.14), and particularly welcomes the work underway on the two 2011 Censuses. The WDC feels that the policy relevance of the analysis of cross-border data should be the key priority. Facilitating the increased use of spatial data and analysis by other policymakers across Departments and agencies, in addition to spatial planners, would be a critical step in raising spatial awareness in sectoral policy-making e.g. health, education, enterprise. A development which is fundamental to effective regional policy.⁶

We hope that this submission proves useful in the further development of the Framework for Collaboration and would be happy to discuss any of the points raised. If you have any queries please feel free to contact me at 094 986 1441 or paulinewhite@wdc.ie.

Kind Regards



Pauline White
Policy Analyst

cc: Mr. Aidan O'Reilly, Department of Community, Equality and Gaeltacht Affairs

⁶ WDC, 2010, Why care about regions? A new approach to regional policy