

NPF Submissions,
Forward Planning Section,
Department of Housing, Planning,
Community and Local Government,
Custom House,
Dublin D01 W6X0

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Ref: 8920/101/AD/DK

9th November 2017

Re: <u>Ireland 2040 Our Plan – Response to Draft National Planning Framework by Sligo Chamber of</u>
Commerce and Industry

Dear Sirs,

On behalf of our members, we wish to make this submission in response to the draft NPF. While we welcome some positives in the draft NPF (such as the recognition of the Atlantic Economic Corridor), we believe that the plan does not go far enough in the alleviation of disproportionate economic growth between the Greater Dublin Area and the West of Ireland and, in particular, the North-West.

We submit that Sligo be included as one of the six city areas and that a Metropolitan Area Strategic Plan be prepared for Sligo as it is the most obvious large regional town that should be supported without reservations by the NPF and the National Investment Plan to achieve its growth potential in terms of employment and population growth, in parallel with infrastructural development and regeneration of the town centre.

A Metropolitan Area Strategic Plan for Sligo ensures Foreign Direct Investment, indigenous industry growth and major infrastructural investment are prioritised - each of which are the key components of real growth opportunities for the <u>entire</u> North-West economy. These major prioritised investments then act as the foundation for new jobs and new businesses in:

- The tourism and adventure opportunity associated with the Wild Atlantic Way.
- The high-quality food production opportunity supported by local agriculture.
- The marine sector based opportunity and products and industries.
- The renewable energy opportunity responding to the needs of a decarbonising economy.

County boundaries will become less important as industries cluster on a more regional basis. It was with this concept in mind that our submission of March 2017, which set out our vision to 2040, proposed that Sligo will be the major growth centre in the North-West serving an ultimate population of 400,000 in County Sligo, County Leitrim, North Mayo, South Donegal, North Roscommon and North-West Cavan.







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The NPF (Table 2.1, page 39) proposes that the 2040 population of the Northern and Western Region would increase by 150,000 – 175,000 of which Galway would accommodate 45,000. The Table proposes that the growth of other towns (including Sligo) would be determined by Regional Spatial and Economic Strategies within the overall National Framework. In Section 1 of our submission of March 2017, we highlighted how Sligo's core can readily expand by an additional population of 27,800 and that another 16,000 can be accommodated in the satellite towns which totals an additional 43,800 persons and is comparable to the Galway growth figure. Galway will struggle to deliver on population growth in the immediate future due to extreme traffic congestion. This presents opportunity for Sligo in the short-term.

The enablers to the growth of Sligo and the North-West include:

- The creation of the Technological University in the North-West having IT Sligo as the hub.
- The early construction of the Western Distributor Road which will unlock a 32ha campus for industry and allow for a doubling of current FDI employment.
- The upgrade of the N4 Collooney to Castlebaldwin followed by the M4 Motorway between Mullingar and Roosky and the Carrick-on-Shannon Bypass thereby improving connectivity with the East and accommodating border traffic from the North-West post BREXIT.
- The upgrade of the N17 between Collooney and Charlestown (Tubercurry By-Pass) and improvements to the N15 providing improved connectivity along the Wild Atlantic Way and Atlantic Economic Corridor.
- Increased connectivity to the world via the AEConnect transatlantic fibre connection at Killala and the completion of the National Broadband Plan.
- Development of major flagship projects including a Yeats Cultural Centre; leverage of Sligo's rich archaeological resources; and the development of a major North West Outdoor Recreation Hub spearheaded initially by the Coolaney Mountain Bike Park and a Surfing Centre of Excellence in Strandhill.
- Creation of a Strategic Development Zone at Ireland West Airport Knock.
- Upskilling of all staff within the tourism sector including those working at operational level, providing the
 very best visitor experience and also those working at executive level selling the North West
 internationally. Provision of increased bed capacity.
- The support of food tourism trails (producers and providers), food experiences and offerings to connect visitors with the place, history, setting, ingredients, processes, craft and skill of the North West's food sector.







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• A supply of renewable energy generated in the North-West from onshore wind, offshore wind, wave and biomass and backed up by natural gas from the Corrib Gas Field.

As outlined above, Sligo is the most obvious regional town that should be supported without reservation. However, Dundalk is the only former NSS Gateway nominated in the Draft NPF for the purpose of "developing the critical mass of the Newry-Dundalk area to compete with other large cities" (Fig. 7.2 on page 103 in Section 7.3 Working together for economic advantage). Given that Dundalk is a large town located in the Dublin's catchment area, it is not clear why it receives explicit support for growth while Sligo, which is outside the catchment area of any city, is not mentioned in a similar context.

During recent weeks, there has been widespread discussion throughout the North-West on the need for a city to be designated such that the region can be developed in a focussed manner. Indeed, the Chief Executives of Counties Mayo and Leitrim are in support of Sligo being designated one of the six cities as will be evidenced in their individual submissions.

Sligo has the desire, capacity and ambition to be the regional growth centre for the North-West of Ireland in delivering on the vision of the NPF. We hereby submit that Sligo be designated as one of six city regions rather than the five as currently proposed thereby alleviating regional imbalance.

Specific commentary on the Draft NPF is attached for consideration.

Aidan Frauda

CEO!/

Sligo Chamber of Commerce & Industry

Encl./





On Page 8 at 1. Insert Sligo to read;

In terms of overall population and employment growth and new housing provision, the six city regions of Dublin, Cork, Limerick, Galway, Waterford and Sligo will be targeted to accommodate 50% of overall national growth between them, with Ireland's range of large and smaller towns, villages and rural areas accommodating the other 50%, within a better national infrastructure grid in terms of mobility, communications, energy systems and essential public and community services and facilities.

On Page 9 at 4. Insert "Sligo" to read;

We will introduce more strategic and co-ordinated planning of our cities and large towns across local authority boundaries, including statutorily backed Metropolitan Area Strategic Plans in the five cities of Dublin, Cork, Limerick, Galway, Waterford and in Sligo.

- On Page 30 include Sligo in the section on "Irish Cities".
- On Page 35 the target for population growth in the NWRA at 1b is too low compared with the Southern Region;
- Similarly on page 35 at 1c the target for additional jobs for the Northern and Western Region
 is very low, representing a 30% increase when compared with the ambition of the Atlantic
 Economic Corridor.
- On Page 37 the target for population growth at 1b is too low compared with the Southern Region:
- A revision upwards of targets for the Northern and Western Region is required to reflect the above.
- Sligo and the North-West Region should be formally included on a par with Dublin, Cork,
 Galway Limerick and Waterford in Chapter 3.
- Sligo as well as Galway requires fully costed strategic development plans endorsed by
 Government with a commitment to co-finance with EU /EIB resources similar to the €10.3bn
 Strategic Transportation Plan for Dublin; CASP in Cork, Limerick 2030, and Waterford's North
 Quays STZ;
- Page 127, National Policy Objective 63, to be amended to include Sligo as follows;

"Provision will be made for metropolitan area strategic plans to be prepared for the Dublin, Cork, Limerick, Galway, Waterford and Sligo Metropolitan areas and in the case of Dublin and Cork, to also address the wider city region, by the appropriate authorities in tandem with and as part of the relevant RSES."

- The Framework should refer throughout to 6 rather than 5 city regions with revision upwards for both population and employment targets in respect of the Northern and Western Region.
- On page 47 Table 3.1 to include Sligo
- National Policy Objective 10 (p. 51)

"There will be a presumption in favour of development that encourages more people, jobs and activity within existing urban areas, subject to development meeting appropriate planning standards and achieving targeted growth."

What exactly does "presumption in favour of development..." mean? Planning decisions are expected to be made on an objective basis. Clarification is needed.

- National Policy Objective 11 (p. 51)
 - "In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria enabling alternative solutions that seek to achieve well-designed high quality and safe outcomes in order to achieve targeted growth and that protect the environment."
 - What are "performance based criteria"? Will these criteria be defined in future legislation or guidelines?

Amendments re public transport.

On page 59 insert under

- " Key future growth enablers for Galway include:"
 - Improved rail journey times to Dublin and Limerick with onward direct network connections and, subject to further analysis, extended rail commuter services and inter-city services to Mayo and Sligo.

At Page 67 Section 4, Diverse Rural Places add; under

• National Policy Objective 17a; "such as high speed rail connections to cities where existing railway infrastructure is capable of upgrade".

On page 133 at the third bullet point under" Accessibility to the North-West"

 add; "and potential re-introduction of rail passenger and freight services between Galway, Mayo and the North West"

At page 135, at the third bullet point

 delete "bus-based" and insert "and between" to read "and key transport projects in and between the other cities and towns"

On page 136, under Rural Development; 4th bullet point

amend to read;

"Investment in maintaining regional and local roads and strategic rail and road improvement projects in rural areas to ensure access to critical services such as education, healthcare and employment."

At page 138 under Green Energy

add bullet point
 "Electrify the existing and planned rail network"