



**National Planning Framework
Issue's Paper 'Ireland 2040
Our Plan: Issues and
Choices'**

**Longford County Council
Members Submission**

March 2017

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Executive Summary

Longford County Council requests that the NPF tackles the national imbalance that has developed over the last 40 years by specifically and actively intervening and directing jobs and infrastructural investment into the northern section of the Midlands and East Region, and the Northern and Western Region.

At a National Level the following specific actions are requested:-

- Develop a clearly defined and balanced strategy for the future development of all parts of Ireland.
- Develop positive intervention strategies for those regions that have been clear 'losers' over the last 40 years of national development.
- Identify the natural assets and areas of environmental importance and provide clear policies for their protection and enhancement.
- Identify the clear strengths and assets of the Regions and define their future role in National Development.
- Clearly defined and regulated infrastructure and employment planning and delivery to underpin the objectives of the NPF.
- Controlled and regulated joined up thinking at Government and National Agencies level to ensure balanced and effective regional development and the implementation of the NPF.
- Cross departmental support and commitment to the NPF is essential with investment mirroring strategic vision.
- The impact of Brexit and a '*Hard Border*' scenario should be considered and planned for.
- Consider and enshrine the ethos of the following Plans in the NPF:-
 - '*Realising our Rural Potential*' – Action Plan for Rural Development;
 - '*Rebuilding Ireland*' – Action Plan for Housing and Homelessness;
 - '*Creative Ireland*' Programme 2017-2022;
 - *Action Plan for Jobs for the Midland Region 2015-2017.*

At a Regional and Local level there is an urgent need for interventions in the North Midlands and the Northern and Western Regions to encourage their development. The following investments are required:-

- That Longford's position as a Strategic Portal in the north Midlands be recognised and supported in the NPF. (See Figure 1)
- Longford plays a complimentary role in both supporting the East while promoting Athlone and the Midlands and directly connecting through and supporting the Northern and Western Region.
- Support the IDA approach of promoting an N4 Economic Development Corridor from Lucan to Sligo through Longford.
- Athlone should be designated as a Regional City in the Midlands and be supported to develop as an alternative growth centre and counter magnet to Dublin.
- The following towns within a 30 minute drive catchment of the new regional city, should be identified to play a supporting role, Longford, Mullingar, Tullamore, Ballinasloe and Roscommon; each to be regarded with equal status at national and regional level.
- The key role of the Midlands Region to act as an economic and transport development zone supporting the National Economy be recognised and supported in the NPF.
- Sligo should be designated as a Regional City and alternative growth centre in the Northern and Western Region.
- As a Strategic Portal, Longford should be recognised as a key link between east and west with a specific focus on creating connectivity and development in the north west of the country.
- The N4 National Primary Route needs to be developed to Motorway standard from Mullingar to Sligo. (See Figure 1)
- The N5 National Primary Route needs to be upgraded from Longford to Castlebar.

- The N55 National Secondary Route needs to be upgraded from Athlone through Longford to Cavan Town.
- The N63 National Secondary Route needs to be upgraded from Longford to Roscommon.
- Dual track of Rail Line from Dublin to Mullingar and Longford to encourage more sustainable transport.
- The following Development Corridors should be prioritised to encompass large towns along the following improved access routes; N4, N5, N55 and N63. (See Figure 1)
- Designation of AIT as a Technological University for the Region. Agencies such as IDA and Enterprise Ireland have stated that locations with University status are essential if they are to deliver new investment for the region.
- A major gas pipeline needs to be provided from Athlone to Longford, Carrick on Shannon and on to Sligo.
- Broadband needs to be substantially upgraded in the North Midlands and the Northern and Western Region.
- Support for social infrastructure, housing and regeneration programmes to deliver sustainable communities.
- Prioritise and develop the Royal Canal Dublin to Westport Greenway and the Shannon North South Greenway / Blueway as primary national cycling routes linking to the River Erne and the Northern Canal system onto Belfast.
- Designate and promote the Lough Ree and Mid Shannon Wilderness Park as a National Park for both healthier lifestyles and environmental management.
- The River Shannon should act as a central connecting axis between Ireland's Ancient East and the Wild Atlantic Way.

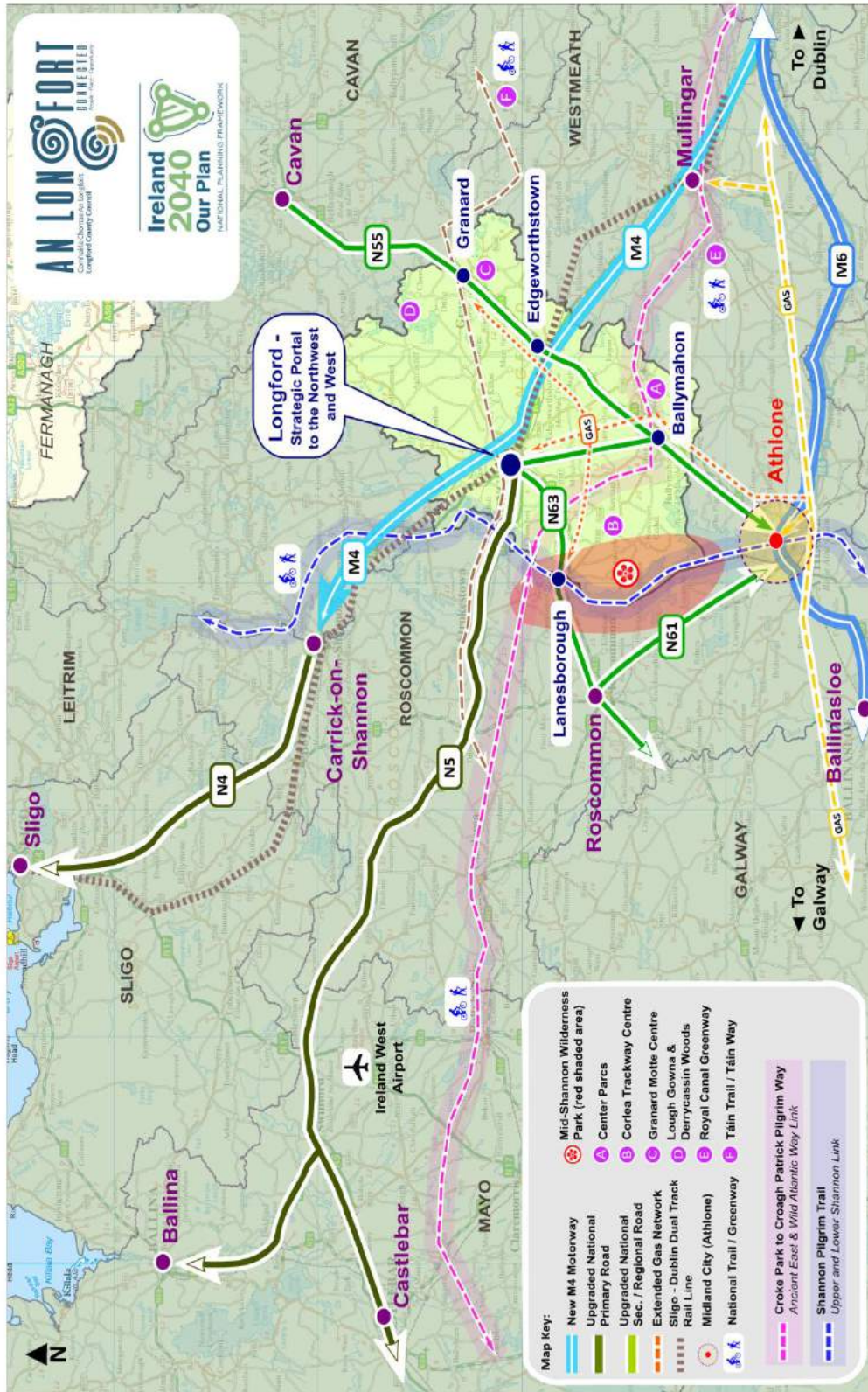


Figure 1: Longford in 'Ireland 2040' Context

Introduction

Longford County Council (LCC) welcomes the preparation of the National Planning Framework (NPF) and believes that this work represents a major opportunity to consider, analyse and prepare effective evidence based policy which can address many of the serious and critical fundamental issues which will affect the future development of this country.

LCC considers that Ireland urgently requires a strategy as opposed to a wish list which will address all parts of Ireland. Clearly the '*Business as Usual*' model has resulted in detrimental regional imbalances with clear winners and losers. The north Midlands and Northern and Western Region in particular have clearly been left behind in terms of infrastructure, jobs and economic development. This imbalance and lack of national investment in these regions clearly needs to be addressed in the NPF.

There is a clear need for intervention and controlled direction in terms of a joined up approach to strategic infrastructure and investment decisions across all sectors of Government and national investment. Longford would contend that the main drivers of National Development for the last fifty years have been the location of jobs and roads infrastructure. Thus the role of the Industrial Development Authority (IDA), Enterprise Ireland (EI) and Transport Infrastructure Ireland (TII) has been critical. Although all have done an excellent job the result is the complete national development imbalance we have in Ireland today. Unless these two critical areas are carefully regulated and controlled there will simply be a continuance of the '*Business as Usual*' model.

It is expected that Brexit and a '*Hard Border*' with Northern Ireland will have a substantial detrimental impact on the border counties. Longford therefore requests that the NPF considers specifically directing development and in particular jobs and national infrastructure towards those regions that have clearly

been neglected and starved of investment and left behind for the last twenty years in particular. The maps included in the NPF consultation document and attached below (See Figures 2, 3 and 4) clearly illustrate this existing imbalance very well. These neglected regions are the Northern and Western Region and the northern section of the Midlands and East Region. The NPF presents an opportunity for the Government to address the investment imbalance and build upon the capacity of these regions to counter balance the Dublin sprawl.

With the proposed NPF there now exists an opportunity to address the investment imbalance and build upon the capacity of the Regions to counter balance the dominance and sprawl of Dublin.



Figure 2: IDA Jobs (Source: IDA)



Figure 3: National Motorway Network (Source, TII)

Population density, 2011

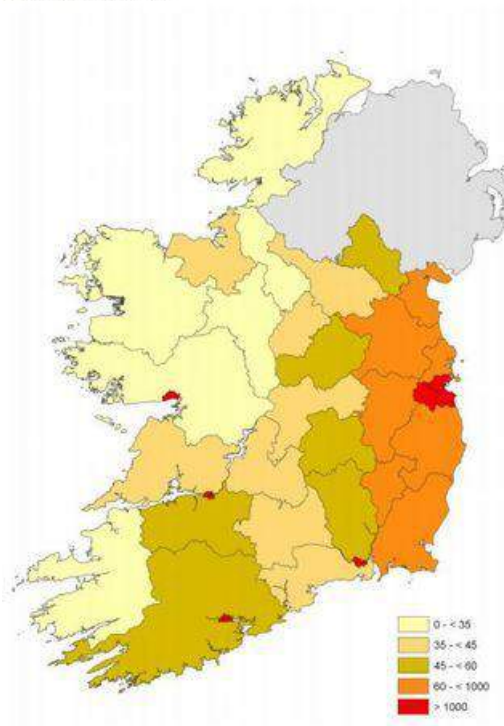


Figure 4: Resulting National Imbalance (Source: CSO)

Report Structure

This document consists of a collective submission by Longford County Council to the first stage of the *National Planning Framework: Ireland 2040, the Issues and Choices paper*. In terms of structuring this response it has focused on the Key Chapter Titles contained therein:-

1. Ireland's National Planning Challenges
2. People's Health and Well-Being
3. A Place Making Strategy
4. Ireland's Unique Environment - Sustainability
5. Equipping Ireland for Future Development - Infrastructure
6. Enabling the Vision - Implementing the National Planning Framework.

This submission will deal with each of these issues in turn:-

1. **Ireland's National Planning Challenges**

- It is important to learn what worked and did not work for the NSS. The NPF should aim to address these issues:-
 - The implementation of the NSS failed to win meaningful political support, as witnessed by the Government's decentralisation programme in 2003 when NSS Gateways and Hub towns appeared to have little influence over the destination of decentralised Departments and State agencies;
 - The NSS was poorly aligned with national capital investment programmes in particular that of the IDA and the TII (NRA), and the funding made available for the Gateway Innovation Fund was reduced;
 - There were too many Gateways and Hubs, and the concept of linked Gateways and Hubs was not operationalised in sufficient detail to be effective;

- The NSS was not put on a statutory footing at the outset;
- There was no inbuilt review process; the NSS, having been drafted in the era of the Celtic Tiger, proved incapable of responding adequately to the radically different circumstances of the post-2007 economic crash.
- The NPF should now, therefore, define national roles for the Regions based on their natural assets and intrinsic strengths.
- As a policy adopted by Government, the NPF should also form the means of co-ordinating activity across Government departments, by setting out clear spatial development strategies which can be used to direct funding.
- In relation to the reduction in the number of targeted areas in favour of groupings that have demographic and economic relationships, the Midlands and the North West Regions have been overlooked. Clear investment interventions and positive discrimination are required to bring these areas up to an acceptable standard to fulfil their national role.
- The demographic and economic context of the inner Midland Counties including Longford and Offaly and the Northern and Western Region is very different to that of the Dublin Counties and should be catered for and addressed in the NPF.
- It is considered that more than the 4 no. urban centres outside of those identified in the NPF issues paper which are limited to the coastal edges of Ireland should be identified. There is a need for designation of a Midland Regional City and alternative growth centre. Athlone is ideally positioned with the following supporting network of towns within a 30 minute drive catchment; Longford, Mullingar, Tullamore, Ballinasloe and Roscommon; to fulfil this role. (See Figure 5) Each supporting town having equal status at national and regional level as part of a new Collaborative City Region.
- The following Development Corridors should be prioritised to encompass large towns along the following improved access routes; N4, N5, N55 and N63.

- Longford’s role will have a dual effect of supporting the development of the Midland city and greater north midland region, as well as acting as the critical access point to the North West of the country in terms of improved N4 and N5 access.
- The designation of Athlone as a Regional City and alternative growth centre is in accordance with the Review of the recommendations made in the 2014 review of the NSS by an Expert Group, appointed by the government.
- Consider and enshrine the ethos of the following Plans in the NPF:-
 - *‘Realising our Rural Potential’* – Action Plan for Rural Development;
 - *‘Rebuilding Ireland’* – Action Plan for Housing and Homelessness;
 - *‘Creative Ireland’* Programme 2017-2022;
 - *Action Plan for Jobs for the Midland Region 2015-2017.*

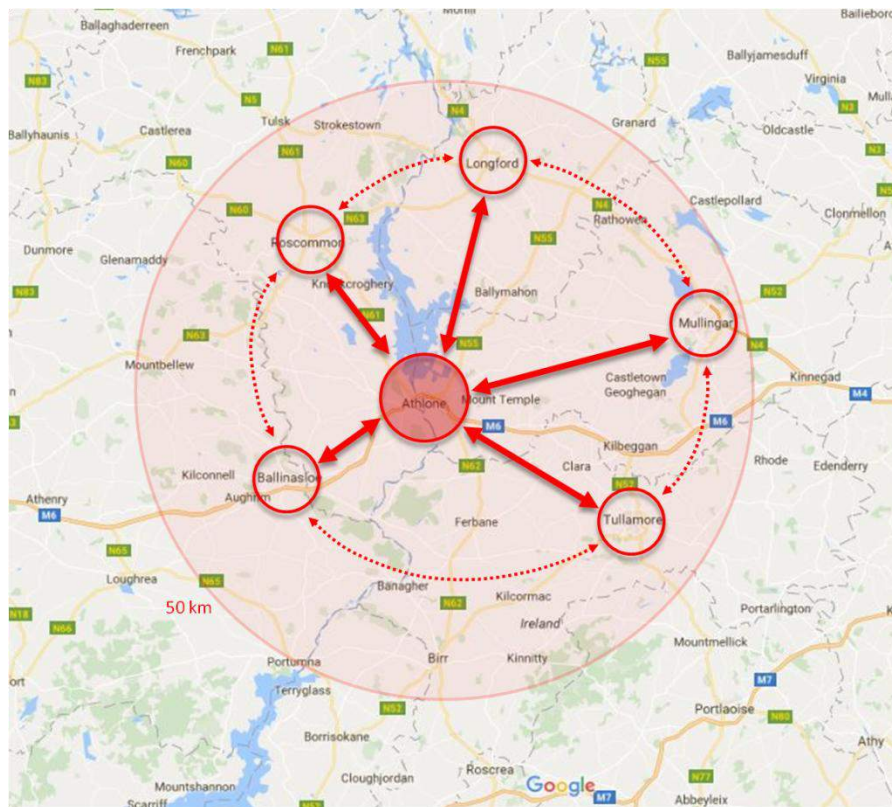


Figure 5: Athlone Midland Regional City and 30 minute Drive Zone

Scenario Based Approach

- The NPF should include a summary of economic forecasting models and potential outcomes which have influenced the formulation of the Framework.
- Experience with the NSS has shown how a policy that is based on one spatial development perspective can be highly vulnerable to changes in economic and population performance during the plan period as population initially grew faster than projected it later slowed down. As such Longford County Council considers that a range of scenarios which take account of population and economic growth and decline at various levels should be taken into account.
- The NPF should test different future paths of development including Brexit, further policy integration with Northern Ireland, future impacts on agricultural practices, achievement of the targets in the Energy White Paper (which would suggest a radical change in mobility patterns) etc.
- In relation to Brexit, consideration should be given to various different scenarios incorporating the possibility of a '*Hard Border*' with Northern Ireland and associated economic implications.
- In terms of Northern Ireland, while further integration is encouraged, taking account of Brexit, it is also possible that the two jurisdictions will separate spatially. Given this uncertainty, it is vital that the NPF takes both possibilities into account in developing policies at national level.
- Longford County Council considers that the Framework must be supported by a strong evidence base which must take account of the results of the most recent Census results.

2. People's Health and Well-Being

- Longford County Council supports the development of centres of excellence in the various regional towns in the Midlands for specific conditions, with Longford taking on the role of Brain Injury specialism or other suitable alternative at St. Joseph's Campus, Longford.

- At a County Level the County Longford Local Economic and Community Plan 2016-2022 contains a Sustainable Economic Development Objective '*to develop critical enabling infrastructure that enhances Longford's viability as a business location*'. Under this the following specific action is noted:-
 - Advocate and promote development of 1st class specialist facilities on the site of St. Joseph's Hospital, Longford Town (E4.1.10);

As such Longford County Council is fully supportive of the designation of such a specialist health centre of excellence for Longford.
- In terms of an aging population, it is considered that future Local Area Plans should take this age demographic into account in the preparation of all Local Areas Plan and if required in terms of the provision of additional facilities identify strategic land reserves which are well located in terms of provision of quantitative and qualitative housing units for the needs of older persons and '*final time*' buyers, the provision of adequate Nursing Home facilities and independent living centres, with particular emphasis in terms of adequate accessibility, access to services, parking provision etc.
- Longford County Council supports the development of the the Lough Ree and Mid Shannon Wilderness Park project - a Cross Regional project between Longford, Roscommon, Westmeath, Offaly, Waterways Ireland, Coillte, Bord Na Mona and NPWS. This potential National Park will have an important role to play in terms of peoples improved health and well being as well as protecting and enhancing the natural environment. (See Figure 6)
- The development of promotion of national Greenways such as the Royal Canal Dublin to Westport Greenway and the Shannon Greenway should be identified and supported in the NPF in terms of peoples improved health and well being and encouraging healthy lifestyles. (Figure 6)
- Appropriate management of our natural resources must be put in place, including the concentration of associated tourism development in

designated settlements or targeted locations to prevent environmental damage.

- Green infrastructure and Ecotourism principles should be encouraged in the development of tourism and recreational projects. The inclusion of potential future Green infrastructure projects and National Parks in the NPF will provide a recreational framework for future national and regional economic development.

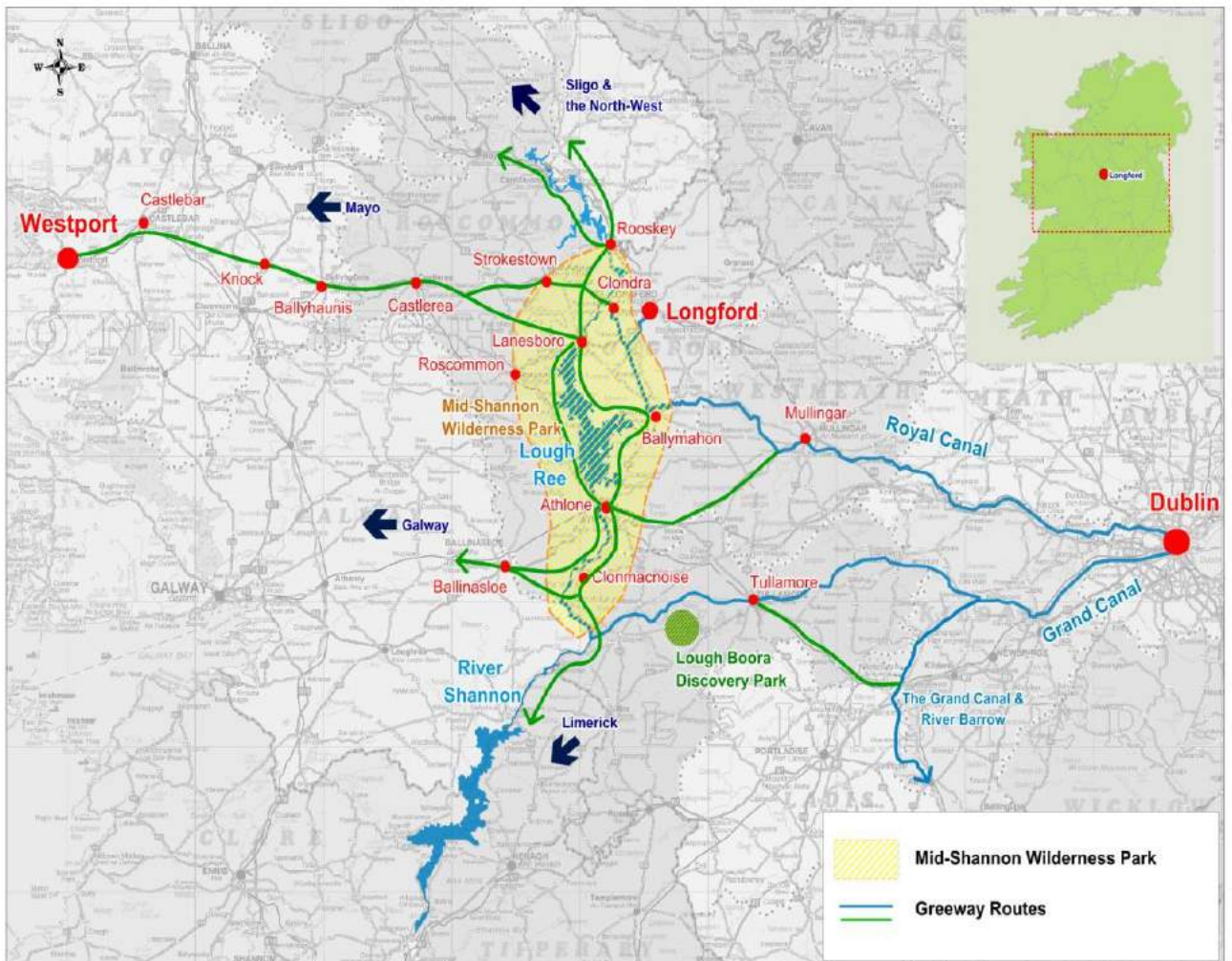


Figure 6: Lough Ree and Mid Shannon Wilderness Park and Future National Greenways,

3. A Place Making Strategy

Our Capital, Cities and Towns

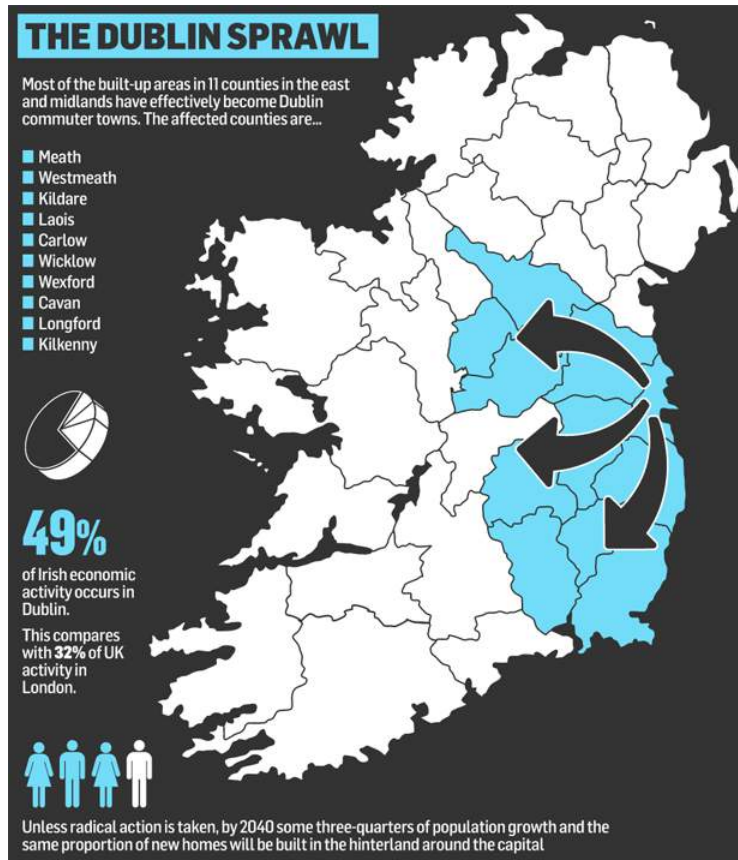


Figure 7: ‘Dublin is eating into Ireland – and Government is not geared to combat growth right’ (Source: Irish Independent)

- The continued influence of Dublin now stretches into 11 counties and accounts for almost half of all economic activity in the State. Longford and many Midland Counties are impacted directly by this sphere of influence from Dublin and need to develop a strong counter magnet in terms of a regional city in the midlands/increased economic development opportunities/strategic sites/e-working facilities located in County towns.
- In order to accommodate additional population growth Dublin needs to become a city of scale, with higher densities and building heights.

Balanced Regional Development

- As the expertise needed to complete successfully internationally, together with supporting services and the increasingly important cultural offering tends to concentrate in major urban centres, each part of Ireland needs to provide the opportunity for focused development.
- While regional cities such as Cork, Limerick, Galway and Waterford have been identified it is considered that this will not be at the appropriate scale or location needed to counteract the influence of Dublin.
- An inventory of resources, strengths and weaknesses (to include an understanding of FDI decisions) of all the regions is needed to inform the NPF.
- The supporting role of IDA and Enterprise Ireland will be crucial to the successful implementation of Ireland 2040 and delivery of more balanced regional development in the Midlands.
- To a great extent, Growth Centres for jobs and investment are self-selecting, and this is the case with Athlone, as it has the largest population, the best transport connections, the highest levels of economic activity and the critical mass of key services such as education. These are key to regional and in turn national success, and in this regard Athlone is vital to the success of the Midlands and the NPF.
- All Regional cities identified need to have a specific role which is complimentary to Dublin e.g. if Athlone were to operate as a regional city it already has an established MedTech and Biopharma specialist role.
- Without this focus and concentration, in the Midlands and the North West respectively, the wider area may suffer potentially irreversible decline. Failure to optimise regional performance will result in unsustainable pressures on Dublin with national performance suffering as a result.
- There is a need for greater locational focus in the Midlands and the Northwest, which has been seriously neglected in terms of national infrastructure and jobs investment to date. Greater locational focus must

be matched by resources. In this regard Gas and improved road networks are an essential requirement to sustain the region.

- The NPF should clarify what designation as a Regional City/Alternative Growth Centre for jobs and investment means for each of these settlements in terms of policy and investment, particularly in the case of Athlone City, which is particularly strong in terms of its MedTech and Biopharma sector.
- Under investment in second tier cities and support towns leads to economic underperformance and regional and national imbalances. This needs to be recognised and rectified in the NPF.
- The current Capital Expenditure review will have major spatial implications and needs to be considered in terms of specific interventions to rectify the clear regional imbalances that have developed nationally.
- Recognition of the supporting towns, Longford, Mullingar, Roscommon, Tullamore and Ballinasloe, in relation to Athlone City as an alternative growth centre must be incorporated in the NPF with their roles clearly defined and each with equal status in terms of economic and infrastructural investment.
- Longford has a strong MedTech, Engineering and Agri Food Sectors to support the Midlands region.
- The findings of the Ibec Economic Indicators report 2017 *'Doing Business Locally'* indicates that the NPF has the capacity to address the economic imbalances, but only if it is underpinned by increased State investment in transport, broadband, water services, health and education infrastructure across the region i.e. Longford, Laois, Offaly and Westmeath and the Northern and Western Region.

In terms of Longford's County Council's approach to Balanced Development on a National scale the following approaches are advocated:-

1. Strategic Portal to the Northwest

- Support the IDA approach of promoting an N4 Economic Development Corridor from Lucan to Sligo through Longford.
- While Longford County Council supports the Regional Cities concept it is noted that there is an absence of any proposed large urban centre both in the Midlands and north of a line from Dublin to Galway. This is very alarming, particularly in terms of balanced regional development and strengthening links to Northern Ireland in terms of economic uncertainty associated with Brexit, where all opportunities to develop possible links with Northern Ireland and by association the UK should be pursued.
- While most counties experienced some level of population growth three counties witnessed population decline over the last 5 years: Donegal (-1.5%), Mayo (-0.2%) and Sligo (0.19%). The development of Regional Cities growth centre should have both an inter and intra geographical regional spread. In order to address this imbalance and avoid unnecessary migration and provide a counter magnet to Dublin, in addition to the provision of a Regional City and growth centre in Athlone; in the northwest there is a need to consider an additional growth centre such as Sligo.
- In this regard Longford plays an extremely important and often overlooked role in the North Midlands. Longford's position and complimentary role as a Strategic Portal in both supporting the East while promoting Athlone and the Midlands and directly connecting through and supporting the Northern and Western Region should be recognised and supported in the NPF. (See Figure 8)
- A well served, high speed rail and road transportation network is necessary in order to ensure balanced regional development, particularly to the northwest which is far removed from Dublin and international markets. This would be facilitated by the provision of improved transportation facilities between Dublin and the northwest in the form of a

Motorway upgrade of the N4 from Mullingar all the way to Sligo/Donegal; and also of a similar upgrade of the N5 to Mayo.

- Additional and improved infrastructure provision in the form of Broadband and Gas are also necessary to facilitate development of the north west region.

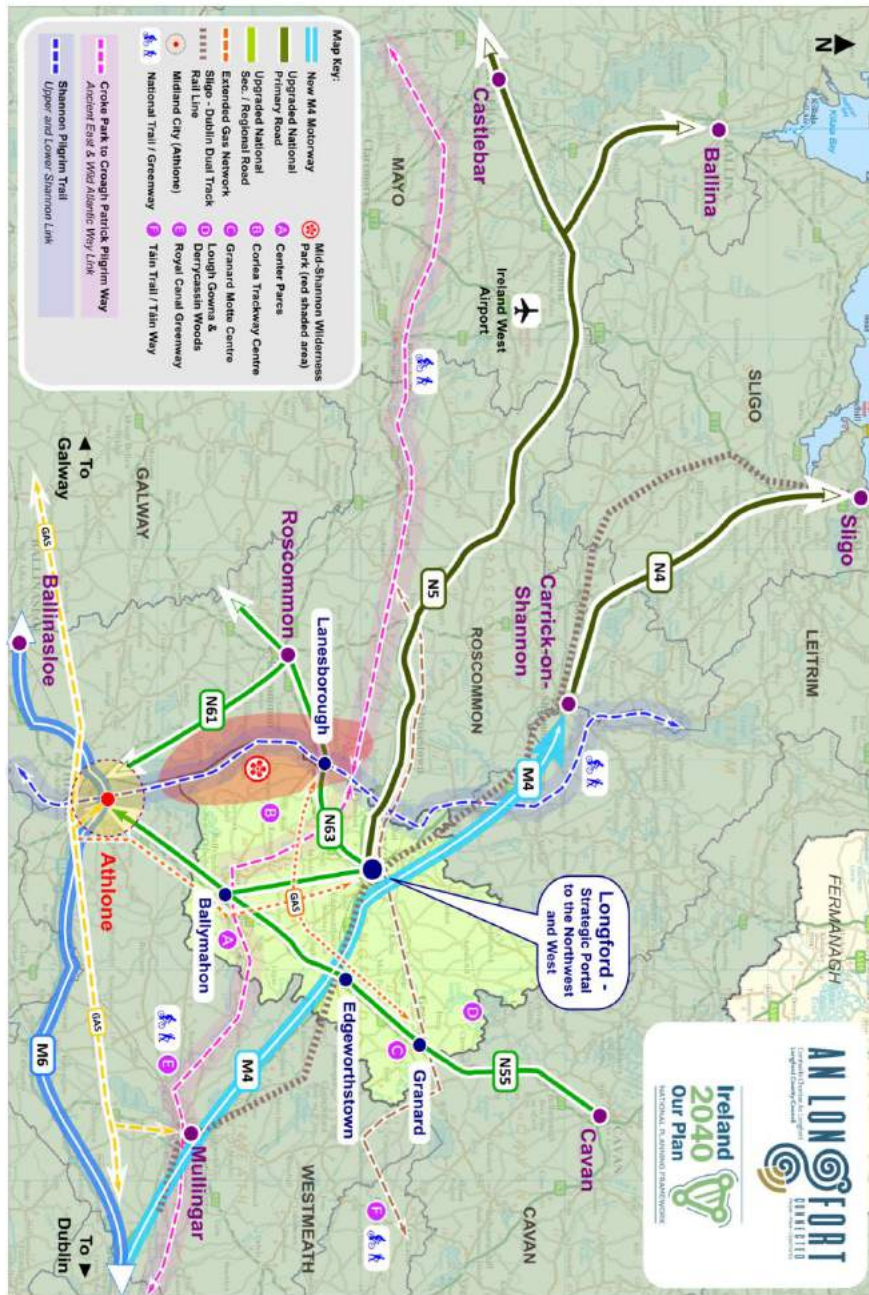


Figure 8: Longford in 'Ireland 2040' Context

2. Midland Regional City and Alternative Growth Centre

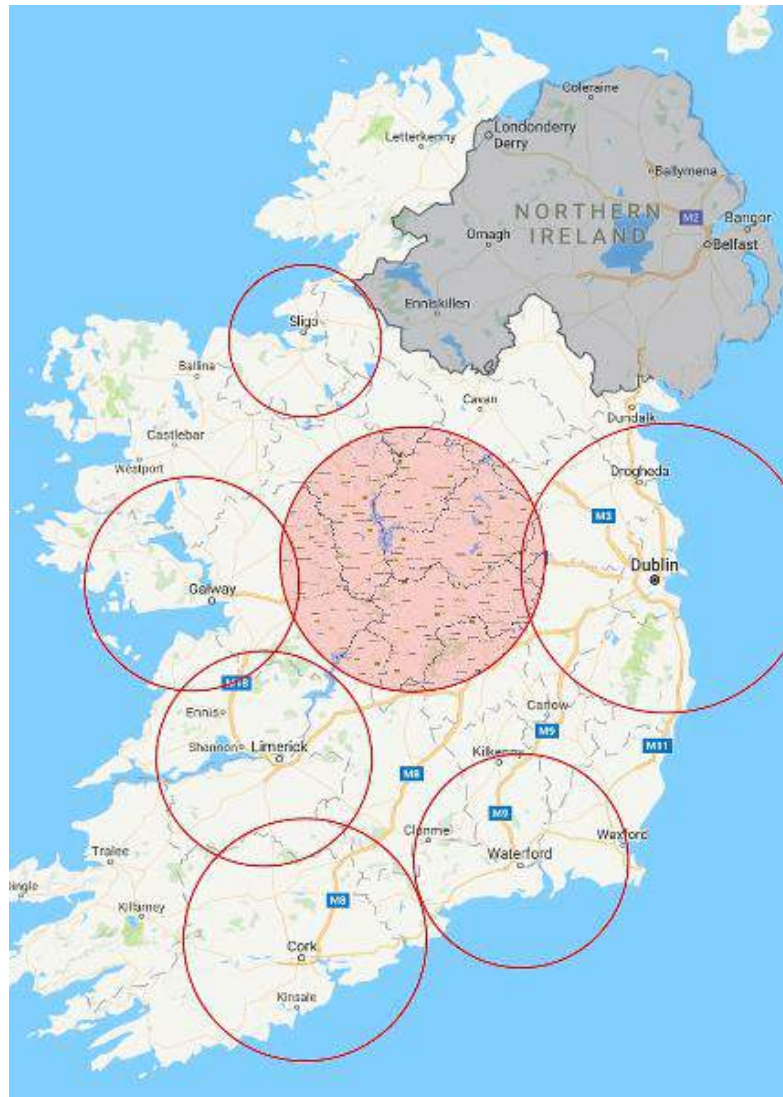


Figure 9: Destination Athlone: Identifying Midland's Regional City

- A map prepared by Destination Athlone highlights the need for a city in the Midlands. Longford County Council is welcoming of the National Planning Framework - 'Ireland 2040' aim to counterbalance the rise in Dublin's population. However it is considered that in addition to supporting the growth of regional cities such as Galway, Cork, Limerick, and Waterford, this counterbalance of the Dublin dominance should also include the designation of a regional city and alternative growth centre in the Midland Region.

- The Midlands area has a catchment population of 450,000 persons residing within a 60km radius, and is the third largest centre of population after Dublin and Cork. It is near enough to Dublin to realistically act as a counter magnet to Dublin. As such a regional centre is also required in the Midlands, in close proximity to Primary Road networks and containing other essential infrastructural assets. In this regard Athlone is considered well-positioned to drive on the region as a whole.
- This is regarded as promoting more balanced regional development rather than creating a doughnut form of future development for the country, where critical mass and services will be sucked out of the midlands, despite its large skill base and rise in population.
- Athlone also serves an Intra Regional Role servicing Roscommon and East Galway.
- Designation of Athlone as a Regional City and alternative growth centre is in accordance with the Review of the NSS by an Expert Group, appointed by the government in 2014 which made the following recommendations in relation to the NPF:-
 - *It should focus on spatial development issues and choices which are genuinely national in scope and scale. It should focus on Gateways (with Athlone being recognised as the Midlands Gateway).*
 - *While the strategic focus on the role of Gateway cities is welcomed, this should be expanded to include a regional city for the Midlands. In this regard Athlone is considered best placed to fulfil this role in terms of critical mass, education base, location, accessibility etc'.*
- The NPF offers an opportunity to seek inward investment for the benefit not only of Athlone but would be a key driver to the successful economic development of the entire Midland Region.
- The following Development Corridors should be prioritised to encompass large towns along the following improved access routes; N4, N5, N55 and N63.

- A *'Zone of Collaboration'* should be designated among agencies in the Midlands in order to help foster a city in this region. Collaboration will be facilitated on a wider scale across the Midlands with Longford operating as a support service town in terms of sustaining critical mass to sustain facilities in the Midland Regional City and alternative growth centre of Athlone e.g. Athlone Institute of Technology, MIRC (Midlands Innovation and Research Centre) etc. The wider area of Longford would also provide a complimentary role in terms of providing quality of life benefits for future city residents.
- Designation of AIT as a Technological University for the Region. Agencies such as IDA and Enterprise Ireland have stated that locations with University status are essential if they are to deliver new investment for the region.
- The region has suffered in the past because of an inability to secure funding for initiatives that crossed county, or provincial, boundaries, and the focus should now be on creating a *'zone'* for ring-fenced inward investment and mandatory collaboration between agencies e.g. make it a priority for the IDA West and IDA Midlands to sit down once a month to discuss growth in this region; provide a strengthened requirement for all of the relevant local authorities to work together.
- The IDA should consider more formalised cross regional opportunities, for example, cross promotion of Longford, Roscommon, Leitrim and Cavan. The provision by Local Authorities of *'hot desk'* facilities for IDA and other agencies and sectoral representatives could strengthen cross agency and regional cooperation.
- The marketing of the region as a whole with Athlone as the central fulcrum is important and a system for ensuring fair distribution of investment outside of the Regional City needs to be considered in terms of the towns of Longford, Mullingar, Tullamore, Roscommon and Ballinasloe developing as a Development Corridor.

- There should be an obligation on agencies like the IDA to ensure that second tier centres in this Development Corridor, such as Longford, are adequately resourced to ensure that they can market themselves as competitive locations.
- Centres like Longford, Mullingar, Tullamore, Roscommon and Ballinasloe will function as spokes on a wheel to the Regional City of Athlone, and therefore need increased capital and marketing resources to continue to put themselves forward as viable investment locations.
- The designation of Athlone as a regional city and alternative growth centre would require provision of improved rail and road networks in order to promote, market, and support the development of the wider surrounding region i.e. motorway and high speed rail links between Midland towns.
- Broadband, education, and water services infrastructure are also areas which require investment in order to help create a city in the Midlands and realistic counter magnet to Dublin.
- County Longford is already developing as a location for recreation, tourism and well being for the Midland Region exemplified by the development of the Center Parcs Longford Forest holiday resort and the Royal Canal Greenway. This is one of the roles it can play to support the Athlone Regional City and the NPF

Opportunities for Our Regions

- As the objective of the NPF is to shape Ireland's spatial development, it must recognise that places have different, distinctive but unequal potential. In this regard credence and recognition needs to be given to the Midlands region, and Longford's role within same.
- The following Development Corridors should be prioritised to encompass large towns along the following improved access routes; N4, N5, N55 and N63.

- Longford County Council is not satisfied that the role of the larger town can be left to the Regional Spatial and Economic Strategies. This role should also be defined in the NPF.
- The diversity of Ireland's towns, villages and rural areas means that local government is far better placed to identify and co ordinate the smaller scale, targeted policies and investments.
- The NPF should encourage and promote more inter county and cross regional alliances to deliver projects of both a Regional and National nature. The NPF should make it clear that it expects the new regional assemblies, drawing on advice from their constituent authorities to set out how settlements and rural areas can realise their potential.

Rural Ireland

- There is no definition given of what constitutes '*Rural Ireland*'. Much reference is made in the Issue's paper to rural areas and 2nd tier towns without clarification as to what exactly are same. It needs to be understood that the hinterlands link to small rural villages, which in turn link to towns, which link to cities and the relationship needs to be explained.
- In terms of the NSS the concept of rural development was largely limited to enabling residential housing construction in rural areas rather than a broader conceptualisation encompassing social or economic dimensions. The NPF needs to take cognisance of same.
- To ensure intra regional balance, all existing towns and villages should be encouraged to consolidate, providing for positive local growth and making full use of existing infrastructural potential – social, economic, cultural and environmental. Quality developments in villages, including affordable developments, may provide an alternative to one-off housing in rural areas.

- The NPF should encourage and support regeneration of towns by encouraging commercial regeneration as well as family units to move back in to town centres.
- The ethos of '*Realising our Rural Potential*' – Action Plan for Rural Development shall be enshrined in the NPF.
- Every effort should be made to maintain essential services in rural villages e.g. Post Offices.
- The NPF should encourage and support the Regions to build and capitalise on our natural resources - beautiful and peaceful country side, rivers, lakes, quiet rural roads, canal, heritage, culture, renewable energy potential and energy storage opportunities - create clusters in different locations to support national development.
- Key national tourism projects should be identified such as Lough Ree and the Shannon Wilderness project which also has substantial ecological benefits, assists with climate change, helps alleviate flooding, as well as providing a unique tourism opportunity,
- There are 3 no. main situations where rural housing impacts on spatial development:-
 - The role of population and household growth in sustaining fragile rural communities;
 - the extent to which a proliferation of housing can limit options for key infrastructure investment decisions e.g. on transport networks and energy transmission;
 - The extent to which the countryside is compromised by excessive insensitively sited and designed housing.
- Rural housing in terms of quality, siting and design is an issue to be addressed in future planning guidance. Such new national guidelines which also look at dispersed settlement patterns and address the demise of small towns and villages in rural areas, car based mobility vis-à-vis energy policies, objections to wind farms and electricity pylons and national commitments to address climate change.

- The investment in the national motorway network has radically changed the accessibility of the regions within Ireland. The creation of this network will put continued pressure on the development of land adjacent to this network, particular in the vicinity of motorway interchanges. It is important that a national policy is developed to protect these areas both for suitable development but also prevent dispersed commercial and residential development occurring.
- In terms of rural Ireland the role of agriculture and forestry related practices should be considered, particularly in light of EU Directives and the Brexit context.
- Longford supports Waterways Ireland Heritage Plan 2016 to 2020 and asks that it be considered and included in the National Planning Framework. It is a key cross regional plan which is of major National significance particularly in terms of Tourism, health and well being.

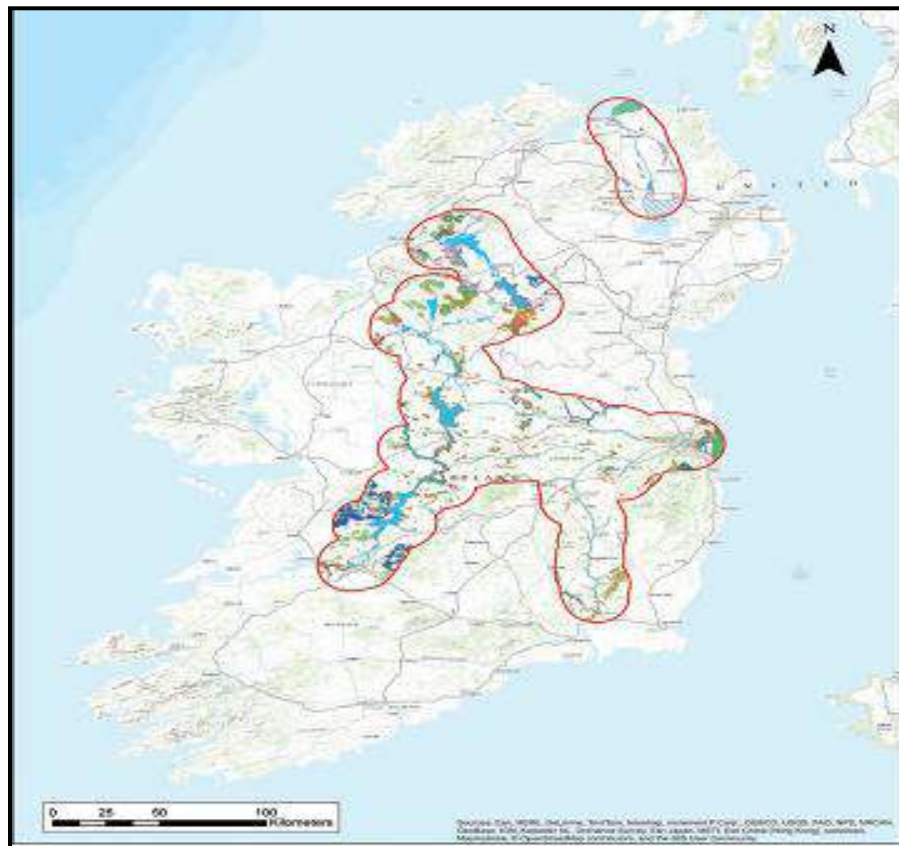


Figure 10: Waterways Ireland Heritage Map 2017

Ireland in an All-Ireland Context

- Longford County Council acknowledge that the linked Gateway of Letterkenny/Derry previously identified in the NSS 2002 is now more problematic on operational grounds as the 2 centres are 35km apart, and that Brexit is likely to reinforce the practical difficulties created by 2 separate planning jurisdictions. A '*Hard Border*' resulting from Brexit is also likely to impede progress in all island spatial planning.
- In terms of Northern Ireland, while further integration is encouraged, the degree of spatial and functional integration between the Republic and Northern Ireland and between the main urban development areas of Dublin and Belfast is highly uncertain and taking account of Brexit, it is also possible that the two jurisdictions will separate spatially. Given this uncertainty, it is vital that the NPF takes both possibilities into account in developing policies at national level.
- Issues to be addressed include the strategic potential of the Dublin – Belfast corridor, and greater alignment of cross border infrastructural planning. The strategic potential for the development of a North West transport corridor with Longford serving as the critical access point to the northwest should be considered and developed.
- The impact of Brexit on agricultural practices should be considered.

Integrated Land and Marine Development

- While Longford County Council is a landlocked county and will not be directly affected by marine development, it nonetheless recognises that the NPF forms an ideal policy document to consider the implications of marine spatial planning for the local authorities with a coastline and to ensure that consistency is carried through in the hierarchy of plans, from national to local level to ensure integration between sea based activities and the planning system.
- In this regard a consistent approach is needed to dealing with visual impact of off-shore wind farms, coastal erosion prevention and mitigation,

protection of sensitive parts of the coastline, areas where marine infrastructure is likely to have spatial implications for the coastal zone, e.g. landings of cables and pipelines, port development, off-shore oil and gas exploration etc. The NPF can provide such a consistent framework.

4. Ireland's Unique Environment – Climate Change and Sustainability

Energy

- Energy should be a central concept within the NPF and renewable energy policy should be considered as a spatial component.
- Given EU Renewable Energy requirements in relation to Ireland, providing a National Renewable Energy Strategy is a basic requirement for the NPF.
- Strong and unambiguous implementation policies in respect of achieving a low carbon society by 2050 must be set out in the NPF and in subsequent regional planning policy and County/City Development Plans. To this end Longford County Council advocates the expansion of gas networks to service the midlands and northwest region.
- Provision should be made for the identification of a Renewable Energy College in the Midland Region, with Longford providing the ideal location in terms of its existing expanse of peatlands, proximity to the River Shannon and Lough Ree, in addition to various solar and wind developments within easy access.

National Landscape Strategy

- The NPF provides an opportunity to adopt a national landscape strategy which could address National Parks, areas of high scenic amenity, and cultural landscapes in need of protection. Such a strategy could be integrated with an ecological strategy that seeks to maximise the potential of the European designated sites by linking these sites into a national ecological network.

- The NPF should designate Lough Ree and Mid Shannon Wilderness as a National Park. Lough Ree is one of the best preserved and ecologically important lakes on the Shannon River System. The surrounding wetlands and bogs have substantial potential to be developed as a national wilderness of international importance. This potential National Park will have an important role to play in terms of peoples improved health and well being as well as protecting and enhancing the natural environment.

Quality of Life

- Longford does not aspire to be the Midlands City but instead would function as a support town to the Regional City of Athlone and alternative growth centre, as it has an extraordinary proposition around tourism, environment, food hubs, quality of life and sport. This would fit in with the challenges which 2040 seeks to address including the required provision of 500,000 new homes needing locations much closer to services and amenities and also rebuilding community and commercial life in the areas of our cities and towns and protecting the many qualities of our rural communities.
- Longford believes that it is critically important to create a quality environment for young families and those growing older (retired from work but not life). In this regard it is essential to provide quality housing with supporting infrastructure, education, care facilities, sport & recreation facilities, health services, etc.
- Longford with its quality environment and existing infrastructure believes it will support Athlone Regional City and the objectives in the NPF in providing a place to escape and unwind for city dwellers/workers. It can act as a recreational '*playground*' for the region with its forests, lakes, rivers and bogs and provide a resource feeder service for the new regional city.

5. Equipping Ireland for Future Development - Infrastructure

- The consultation paper promises that future capital investment programmes will be supportive of NPF policy priorities, however it is to be hoped that the draft Plan will provide more detail as to how such critical alignment will be achieved in practice, given the acknowledged failures of the NSS in this regard.
- In particular, a commitment to a Gateway type Innovation Fund (or similar equivalent) for Regional Cities and alternative growth centres, would signal more autonomy for regional and local authorities in the selection of priority projects within the Regional Cities themselves.
- Opportunities should be spread more widely because improved regional performance means stronger national performance. Increased capital investment in the form of Broadband, improvements to the road and rail networks, the provision of Natural gas, and increased social infrastructure should be considered for the Midlands, and in particular for Longford. The designation of Strategic Infrastructure locations in the Midlands as centres of excellence would assist rebalance the current extreme national imbalance.
- In all rural county towns outside of Dublin (particularly with a support function to Regional centres i.e. Longford Town), in order to make these sustainable entities in their own right, incubation facilities for innovative and knowledge based enterprises and centres, digital hubs and centres that facilitate e-working should be encouraged, with future Local Area Plans identifying locations for same.

a) *Capital Investment*

- In order to accommodate some of the anticipated additional national population increase of approximately 1 million persons anticipated over the next 20 years as part of the NPF, and with the potential for development of a Regional city in the midlands and the evolution of a Strategic Portal to the northwest region, major infrastructure projects are

crucial to ensure that existing businesses and population can expand and grow within the Midland region.

- In terms of accommodation of future capacity needs both in terms of housing need and economically, greater investment in infrastructure is essential in the coming years in order to ensure an efficient planning system.
- In order to promote balanced regional development and combat the growth of Dublin infrastructural requirements must be met in competing regions. To this end in the Midland Regional the following are required in order to play our role in accommodating future growth scenarios and counterbalancing the Dublin dominance over the country:-

b) Broadband

- Using statistics from the Department of Communications, a report produced by business group Ibec, profiled broadband connectivity across all 31 local authority areas. Dublin had the best connectivity out of the 26 counties with some 99% of premises on course to have access to high-speed broadband. Counties in the north and west of the country generally had worse % broadband access than those in the east. It was also indicated in this report that the areas with the worst connectivity also tend to have the slowest average broadband speeds.

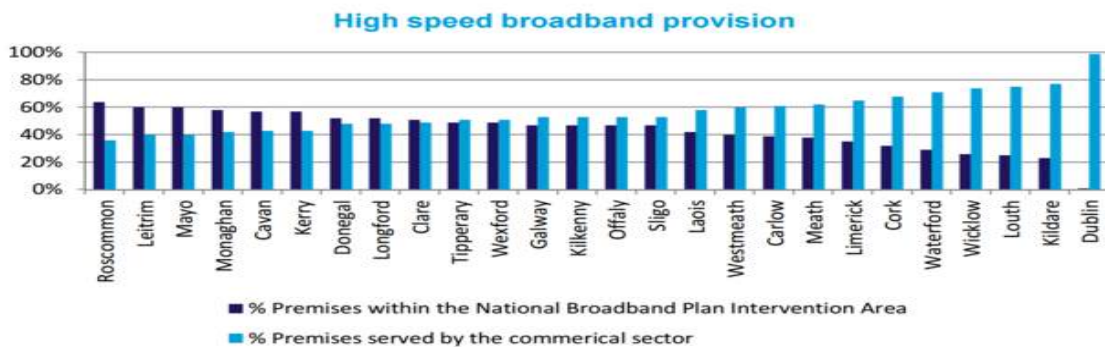


Figure 11: High Speed Broadband Provision (Source: Ibec Economic Indicators Report 2017)

- From the above table it is evident that the Northern and Western Region and the North Midlands has some of the worst broadband provision nationally
- Longford has the slowest average speed in the whole of the country. Data from price comparison website and switching service Switcher.ie from November 2016 found that nationally the worst town for broadband speeds is Legan in Longford, with an average download speed of 1.98Mbps. This also translates to the County as a whole which nationally also had the slowest broadband speeds in the country at 7.25Mbps, compared to Dublin which has the fastest average broadband speed, at 44.85Mbps.
- The National Broadband Plan sets out that broadband with speeds of at least 30Mbps should be available across Ireland. Longford is therefore well short of this and it needs to be addressed as it is having a detrimental impact in terms of economic gain and promoting new businesses to the County, in addition to retaining existing established businesses.
- In order to address the growing imbalance between Dublin and the rest of the country and address Longford's rating at the bottom of the country in terms of Broadband provision, Longford County Council therefore calls on this deficiency in the County's Broadband Infrastructure to be addressed in the NPF.
- As per the Ibec Local Economic Indicators report 2017 '*Doing Business Locally*', the following is recognised:-
 - The digital economy plays an increasingly crucial role in the exchange of goods and services and that households that are unable to easily access online marketplaces are at a disadvantage. It is indicated that this is more acutely felt in rural areas.
 - Insufficient broadband connectivity leaves local businesses and householders at a significant disadvantage. The opportunities that digitalisation offers cuts across sectors and play to the strengths of both urban and rural areas.

- Data intensive industries are increasingly mobile and have provided vital boosts in job creation around the country. Attracting industries that rely on reliable high quality connections remains a challenge in some local authority areas.
- At a county level the County Longford Local Economic and Community Plan 2016-2022 contains a Sustainable Economic Development Objective *‘to develop critical enabling infrastructure that enhances Longford’s viability as a business location’*. Under this the following specific action is noted:-
 - *‘Support implementation of the National Broadband Plan identifying and addressing areas of critical need with an increase in the number of businesses with access to high speed broadband’*, with the desired outcome that every premises in Longford meets the European Digital Agenda quality of broadband service (E4.1.3).

As such Longford County is fully supportive of attempts to improve Broadband Infrastructure with consequent economic and service benefit to the County.

c) Transport

- An integration of transport and land use planning policies is required as transport connections are reflected in locational decisions by major inward investors.
- The importance of good transport connections both from Dublin to the Region and onto the North West, and also within the Region itself in terms of connecting to Athlone as a potential regional city and alternative growth centre, and other supporting towns with the Region for access to their designated allocated centres of excellence cannot be underestimated. Without such improvements the Northern Midland Regional and also the North West will fall into further decline behind Dublin, resulting in even greater levels of disparity within the country.

- Our transport infrastructure is not sufficiently joined up preventing people, goods and services moving seamlessly around the country. While the Midland Region is identified as 2nd in the country in terms of good road surface quality (Ibec Local Economic Indicators report 2017 '*Doing Business Locally*'), connectivity within the Midland region and also in terms of access to international access points (Dublin and Knock airports) needs to be consistently improved, thereby opening up new tourism and trade opportunities (particularly with the future development of the major Center Parcs Tourist facility in Longford).

i. Road

- As per the Ibec Local Economic Indicators report 2017 '*Doing Business Locally*', in terms of road connectivity and road quality the following is indicated:-
 - '*Businesses are increasingly concerned with average journey times when examining their supply chain management, Exporting businesses in much of the North West must travel for over two hours to reach a major Tier 1 or 2 designated port. Similarly businesses and citizens in Sligo must travel over two hours to reach a state airport. Peripheral counties, particularly those in the North West, experience significantly longer journeys to reach key infrastructure. Demographic growth also means traffic volumes are increasing, adding further to journey times...*'
 - While much has been done to improve surface conditions, businesses in Mayo and elsewhere face challenges trying to trade their goods and services within their county and region;
 - Poor road quality has a significant impact on competitiveness (e.g. journey times, capital overheads etc) and is an additional cost to businesses at a local level;

- Local Authorities must continue improving road connectivity and road quality locally, between our main cities, and along our radial routes.
- Accordingly provision of the following improvements to the existing road network are required:-
 - Upgrade of the N4 to a motorway;
 - A similar upgrade of the N5 to Mayo to Grade 1 standard, thereby allowing the northwest to prosper with improved linkages to Dublin and consequent international markets.
 - Improvements to consist of the N55 upgrade through the county to Athlone would facilitate greater cross county trade within the greater Midland Region.
 - Improvements to consist of the N63 upgrade through the county to Roscommon and the N61 from Athlone to Roscommon would facilitate greater cross county trade within the greater Midland Region.
- Consequently Longford would therefore naturally evolve as a Strategic Portal for both routes thereby leading to its natural designation as a focus point in the NPF.
- At a County Level the County Longford Local Economic and Community Plan 2016-2022 contains a Sustainable Economic Development Objective *'to develop critical enabling infrastructure that enhances Longford's viability as a business location'*. Under this the following specific actions are noted:-
 - *'Priorities plans for the following: (i) To extend the M4 dual carriageway along the identified corridor from Mullingar, Co. Westmeath to Dromad, Co. Leitrim;*
 - *Upgrade the N5'*, with the desired outcome of enhanced road connectivity to Dublin and other centres (E4.1.4).

ii. Rail

- Improvements to the rail network both to the North West and within the Midland Region itself are central in order to ensure balanced regional development and also in terms of sustainability and climate change considerations.
- The rail lines from Maynooth to Sligo need to be dual tracked as a priority (within next 5 years) in order to facilitate its greater economic benefits to the Northern and Western Region.

iii. Sustainable Transport

- The increased provision and funding of more sustainable forms of transport should be given a higher priority in the NPF.
- The National Greenway or cycleway routes need to be strategically revised. At present they essentially follow National Primary Road Routes system. They should instead follow existing state owned canals, rivers, Bord na Mona bogs and Coillte forests thus avoiding conflict with private land owners and motorised traffic.
- The Royal Canal Greenway extension to Westport and the Shannon Greenway from Kerry to Sligo and the Erne Waterway should be prioritised for national investment. This will allow adjoining authorities to connect their local greenways to the National Greenway System.

iv. International Access

- Longford County Council considers that an increased role should be provided for regional airports such as Knock in the Northwest and Abbeyshrule, Co. Longford. In this regard the potential for Abbeyshrule should be considered for designation as a midland airport to serve the region should be explored.
- At a County Level the County Longford Local Economic and Community Plan 2016-2022 contains a Sustainable Economic Development Objective *'to develop critical enabling infrastructure that enhances Longford's*

viability as a business location'. Under this the following specific actions are noted:-

- *'Promote and support the sustainable use and viability of Abbeyshrule Airport and expanded facilities'*, with a desired outcome for higher usage of Abbeyshrule Airfield and its recognition as the most significant airfield in the Midlands Region (E4.1.7).
- Transport networks and facilities between Regional airports and urban centres, particularly Regional Cities, and large support towns should be improved.

d) Natural Gas Provision

- Longford County Council now needs an extension of the existing National Gas Network from Athlone passing through County Longford enroute to the northwest of the country and that this is prioritised as part of national Infrastructure provision.
- The County Longford Local Economic and Community Plan 2016-2022 contains a Sustainable Economic Development Objective *'to develop critical enabling infrastructure that enhances Longford's viability as a business location'*. Under this the following specific action is noted:-
 - *'Attract mains gas infrastructure to County Longford'* (E4.1.6).

As such Longford County Council is fully supportive of the designation of the provision of mains gas infrastructure to serve the County. In essence this would be an extension of the existing network, part of which traverses County Westmeath to provide a service to the North Midlands.

e) Strategic Infrastructure Locations

- As Ireland will continue to need to develop large scale strategic infrastructure, Longford County Council is in favour of the suggested possibility of designating Strategic Energy Zones at national level.

- Opportunities should be spread more widely because as improved regional performance means stronger national performance. In this regard Longford and the Midlands provide such a strategic location, compounded by its location as the Strategic Portal to the northwest.
- The designation of Strategic Infrastructure locations should be chosen in terms of centres of existing centres excellence. In particular the Midlands Region could be designated as a MedTech Centre, taking account of the existing expertise and established facilities and education base in the Region, with Longford which has a strong established existing MedTech and Engineering Sectors playing a supportive role to the Regional City and growth centre of Athlone
- Longford has an existing strongly established manufacturing and agri-feed food sector which should be further developed and expanded upon.
- Consideration should be given to designation of specific Economic SDZs in all of the large towns, including Longford, within the Development Corridors and sphere of influence of Athlone Regional City.
- The County Longford Local Economic and Community Plan 2016-2022 also contains a Sustainable Economic Development Objective *‘to develop critical enabling infrastructure that enhances Longford’s viability as a business location’*. Under this the following specific actions are noted:-
 - *‘Prioritise strategic locations for development to enhance Longford’s appeal as an investment location’ with the desired outcome that dedicated viable economic zones are developed e.g. Connolly Barracks’* (E4.1.1);
 - *‘Contribute and support the development of the Midlands Regional Energy hub, with the desired outcome that a number of demonstration and innovative energy projects are clustered and delivered in the Midlands’* (E4.1.5).

As such Longford is fully supportive of the designation of Strategic Infrastructure Locations and wishes to be favourably considered in this regard.

f) *Social Infrastructure*

- As our population is rising and aging with over 20% aged over 65 years by 2040 there is a increasing demand on infrastructural requirements over the next 20 years in terms of rehabilitative places, hospitals, hospices, schools, third level. In addition to its supporting role to Athlone Regional City, an increased provision of social infrastructure is required in supporting towns in the Midland region, and in particular Longford where there is a shortfall in provision The ethos of '*Realising our Rural Potential*' – Action Plan for Rural Development shall be enshrined in the NPF.
- Every effort should be made to maintain essential services in rural villages e.g. Post Offices.
- In terms of the provision of social infrastructure it is considered essential that this is identified in tandem with the needs of that identified by the '*Creative Ireland*' Capital Expenditure Programme.

6. **Enabling the Vision - Implementing the National Planning Framework**

Implementation and Monitoring

- It is not clear if the NPF will be supported by measures to implement it. Moving from a '*Strategy*' to a '*Framework*' tends to suggest something of a retreat.
- A large failing of the NSS was non-implementation. Therefore to ensure NPF success, there must be commitment, nationally and locally to the full implementation of the NPF.
- The NPF can only work if the following is ensured:-
 - (a) it is enforced and;
 - (b) planners in Local Authorities are given the necessary resources to promote the infrastructure that can support its prescriptions.
- There should be a timetable and costed implementation strategy.

- Mandatory regulations implementing the Framework should be published as soon as possible for all cities, major 2nd tiers towns and their hinterlands. Such Regulations should have clout so that they override Local Authority Development Plans.
- Cross departmental support and commitment to the NPF is essential with investment mirroring strategic vision.

Review

- The NPF should not be so prescriptive that it cannot react to or accommodate new opportunities or changed circumstances, but, equally, it cannot be so generalised or so flexible that it does not provide the direction and stability to guide key investment and policy decisions.
- Longford County Council is concerned in relation to the following:-
 - The NPF is being prepared at a time when Census data is only emerging and therefore a clear picture is not yet available on which to base a Strategy for the next 20 years.
 - Will there be scope for regular review and amendment of the Framework every 6 years as Census figures emerge?

The NPF needs a monitoring mechanism in terms of regular benchmark indicators. It also needs to be flexible in terms of change to reflect potential population shifts, the possibility of errors in population forecasting methods, the potential of another economic crash, and any other unforeseen circumstances. It is advocated that should be a formal review of any replacement strategy every 6 years to correspond with Census updates.

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