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Eastern and Midland Regional Assembly,  
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**WESTMEATH COUNTY COUNCIL**  
Comhairle Chontae na hIarmhí

21 January, 2019

**Re: Draft RSES for the Eastern and Midlands Region**

Dear Mr. Conway,

Westmeath County Council (WCC) welcome and support the development of the Draft Regional Spatial and Economic Strategy for the Midland and Eastern Region and appreciate the opportunity to further participate in and contribute towards setting the strategic planning context for our region, in line with the NPFs vision for Ireland to 2040.

The broad range of issues which have been outlined in the Draft RSES are valued and WCC are fully committed to contributing to the future sustainable development of the region. The important role that the RSES will play in creating a vision that provides for the creation of attractive places which contribute positively to people's health and well-being, in an environmentally responsible manner that does not compromise the ability of future generations to meet their needs is also recognised.

It is however considered that the strategy should provide for the vibrant development of all areas of the Assembly and in this regard there is undue emphasis on the Dublin Region. This sentiment is best captured in the classification of our area using the term 'Outer Region' despite its location asset at the centre of the Country. It is noted that the Growth Strategy provides reference to the preparation of a MASP for the Dublin Region but omits reference to Urban Area Plans for the designated growth settlements of Athlone and Dundalk as drivers of regional growth.

With this in mind, in regard to our role in the Region, we consider it essential that Westmeath is supported in its continued vision to:

- Provide for the maintenance and expansion of a sustainable economic base in County Westmeath.
- Develop Westmeath as a place in which to live, work, invest, do business and visit, offering high quality employment and educational opportunities within sustainable communities.
- Support the continued growth and success of Athlone as a town of scale and a principal economic driver, by securing the investment necessary to fulfil its role as a key regional centre in the Midlands.

- Address infrastructural bottlenecks, improve citizens 'quality of life' and increase housing supply in the right locations and in tandem with supporting social infrastructure
- Maximize returns on existing state infrastructure investment in Mullingar, in supporting its continued role as a key town in the region.
- Support and facilitate the sustainable development of towns, villages and rural communities in Westmeath.

### **Sustainable Development of Westmeath**

In terms of achieving an appropriate regional and county wide strategy for development, it is crucial that the RSES provides for the delivery of appropriately scaled (commensurate with function) yet adequate housing provision across all areas of Westmeath. Such provision is necessary in order to support future economic development and so as to provide for a Regional Centre in the interests of sustainable planning as envisioned under the NPF.

There is concern that the housing allocation provided for Westmeath in the draft RSES is not adequate to support the anticipated increase in employment and population. Despite the designation of Athlone as a Regional Centre with a target population of 30,000 up to 2031, the percentage growth rate envisaged for Westmeath is lower than that for Laois or Offaly and marginally above that projected for Longford. In this regard there is an allocation for metropolitan satellite areas such as Dun Laoghaire - Rathdown and Swords to grow by a combined target of 71,000 (long term target at 100% growth rate). There is also scope in the Draft RSES for towns such as Naas, Navan and Portlaoise to achieve growth to a scale beyond that targeted for Athlone as a Regional Centre. These, and other similar such provisions, are not considered to be in accordance with government policy and seriously undermine the intention of the NPF to ensure that Athlone and its environs can grow sustainably to create viable alternatives to Dublin, which itself must also continue to accommodate growth, principally (as defined by the NPF) within the City Region.

This limited population allocation for the remainder of the County (following population allocation from overall figures for Westmeath to designated centres of Athlone and Mullingar - to which correspondence from WCC to your office, dated 30<sup>th</sup> August 2018, relates) would be seriously prejudicial to the sustainability of the remainder of the County, including other settlements and the rural fabric of Westmeath which are vital to the future of the County.

It is noted that the NPF Roadmap population projections already incorporate headroom figures. The Council support the statement made in the Draft RSES that this may be supplemented by additional 25% headroom, applicable to Westmeath which is projected to grow at or above the national average growth figure. It is submitted that this further headroom should similarly be applied at RSES stage.

In this regard, however, it is submitted that (similar to the RSES identification of 30,000 population target for Athlone to 2031) in order to ensure that the orderly development of the remainder of the County, relative to settlements functions within the hierarchy, is not undermined, the target of 102,500 for Westmeath up to 2031 should similarly be applied for implementation in upcoming Development Plan reviews.

We would therefore welcome clarity in the RSES that that the population targets for the region are aligned with the 2031 National Planning Framework Implementation Roadmap population targets.

It is also submitted that guidance should be provided around the assessment of lands for inclusion in County zoning (Core) strategies. This should include provision for consideration of development land prioritisation measures rather than 'de-zoning' of land, where there may be a surplus and that account be taken of the fact that in certain instances sequential lands, suitable for the delivery of housing may not be forthcoming (for example - as per the provisions of the Urban Regeneration and Housing Act, land which was purchased for agricultural use prior to being zoned residential and which continues to be operated for farming purposes shall be exempt from the levy).

Accordingly, flexibility is required to provide for the allocation and prioritisation of sufficient lands, together with monitoring mechanisms to track delivery in order to ensure sufficient flexibility is available to Councils in achieving growth targets.

### **Delivering on Athlone as a Regional Centre**

The NPF recognizes the extent to which Athlone fulfills the role of regional centre for the Midlands and acknowledges the importance of the RSES in promoting regional centers of population and employment growth to deliver accessible centers of scale.

The success of such regional centres is not based merely on scale but rather is due to a combination of, inter alia, accessibility factors, critical mass, provision of a skilled labour force, social and community infrastructure and housing provision. It is vital that the RSES provides the platform for all of these elements to be supported and delivered in achieving the NPFs vision for Athlone as a Regional Centre.

In order for this potential to be achieved, investment in crucial infrastructure is necessary to underpin and support the future development of the Region. This investment needs to be promoted for delivery in advance or in tandem with development and as a priority within the Midland (Outer) and Hinterland Region.

Further policy is also necessary in terms of enabling the delivery of critical mass with regards employment and housing together with the necessary social and community infrastructure and public realm initiatives. Whilst reference to the growth of Athlone to 30,000 by 2031 is recognised, it is submitted that as per the Implementation Roadmap for the NPF, which sets the parameters for regional strategies to 2026/27, this target should be frontloaded for inclusion as a target under the initial iteration of the Athlone Joint Urban Area Plan.

Retention of the SDZ identified in the Midlands Regional Planning Guidelines 2010-2022 to the east of Athlone at Creggan, including AIT campus, is essential in delivering Athlone as a regional centre wherein the achievement of this critical mass is fundamental to the economic growth of the region. The SDZ offers potential to accommodate the development of major employment and enterprise activities, in association with AIT, building on the existing base of knowledge-based enterprise clusters in Athlone. The SDZ will benefit from a large and skilled population, proximity to national

communication and energy networks such as motorways, rail routes, electricity, gas and broadband networks.

Although recognizing the acknowledgement of Athlone's role in the RSES, it is submitted that enough weight or ambition has not been afforded to the importance of Athlone as a regional driver. This is in sharp contrast to the Dublin Metropolitan Area and Eastern region to which the majority of focus is placed. Enhanced provision is also provided in the Northern and Western RSES in terms of Letterkenny/Derry and Sligo as regional growth centres.

Accordingly, more specific and tailored policy is required to ensure the delivery of the NPF vision to achieve 'more effective strategic planning and coordination of the future development of ... regionally strategic locations at points that straddle boundaries between this and neighbouring regions as in the example of Athlone, which is a focal point for an area reaching into much of this and neighbouring regions in economic and employment, transport, education and public service delivery and retailing terms'.

In this regard RPO 4.4 onwards should include enhanced policy provision (in addition to that already included) for Athlone in terms of:

- Strategic Vision for the future development of Athlone as a Regional Centre including the development of critical mass to reflect its role as a Regional Driver.
- The delivery of strategic needs related to employment, public realm and environment, quality built form as well as housing and public transport (policy in terms of housing delivery should not be area specific at regional level – precise locations should be determined at appropriate Urban Area Plan stage).
- Prioritising infrastructural investment for Athlone to facilitate the delivery of a Regional centre.
- Ensuring that water supply and wastewater needs are met by new national projects to enhance Athlone's water supply and increase waste water treatment capacity.
- Promoting a joint up cross sectoral approach to the delivery of key enabling infrastructure.
- Designation of an SDZ at Creggan to include AIT campus.
- Recognising the existing significant Foreign Direct Investment presence in Athlone, and providing that future such investment and associated economic activity would base in the Regional Centre as an optimal location for such investment in the Midlands Region.
- Support for research, innovation and EU funding opportunities.
- Support the delivery of an Open Space Strategy with provision for a public park, recreational and amenity spaces.
- Support the preparation of Regeneration Master Plans within Athlone and support for associated funding proposals under the Urban Regeneration and Development Fund.
- Support in the preparation of a joint transport study with Roscommon County Council in consultation with key stakeholders such as TII, NTA, CIE, bus operators etc. in relation to the future development needs of Athlone as a Regional Centre (Alternatively clarity should be provided that RPO's for Local Level Transportation Plans can be prepared by the Council immediately)
- Develop the concept of 'Smart Cities' in Athlone to boost the location's attractiveness for people and business and in the interests of innovation.

- Cross-sectoral approach to maximising the tourist potential of the River Shannon and Lough Ree involving Westmeath County Council, Roscommon County Council and Longford County Council and relevant stakeholders.
- RSES policy should support Athlone as a priority location for development. Any policy that encourages/facilitates regional spillage or undermines the ability of Athlone to achieve its Regional Centre growth needs in terms of critical mass for employment, housing etc. should be discouraged.

Whilst the recognition for Athlone in the North West Region RSES is acknowledged, it is essential that the final Midland and Eastern RSES deliver a joint approach and shared vision (including associated housing targets) for Athlone as reflected in both regional strategies for the Eastern and Midland Regional Assembly and the North Western Regional Assembly. Alignment and consistency between both RSESs is essential in this regard and steps should be taken to ensure this outcome.

#### **Maximizing returns on existing state infrastructure investment in Mullingar**

It is submitted that the RSES should place more emphasis on the role that Mullingar plays in the region by way of policy which promotes economic development and employment creation; supports the development of the town's assets in built and natural heritage; encourages the continued investment in arts, culture and outdoor recreational activities including walking, cycling, fishing, boating, eventing and sports; and provides for the continued development of the tourist economy by way of tailored policy for the town.

Significant Government spending in recent years has seen the Mullingar Main Drainage Scheme upgraded at a cost of €39m. Water supply to the town is currently sourced from Lough Owel, but in the long-term will be provided by the South Westmeath Scheme which will provide an interconnector between Athlone and Mullingar or through connection to a feeder from the Dublin Water Supply Scheme. It is therefore crucial that the final RSES acknowledges the role that Mullingar plays as a Key Town and County Town in the region. Any measures contained therein should support and enhance Mullingar's position in the region's economy and not damage its potential to develop.

As already indicated, there is concern that the draft RSES does not provide appropriate housing targets for Westmeath. It is vital that the RSES provides for sufficient critical mass in terms of population, employment and service provision and does not unduly artificially constrict the growth of Mullingar or place unrealistic limits in relation to population growth and housing to accommodate this growth. Such a scenario would limit government's ability to realise return on capital investment in the town.

Greater recognition to the role that Mullingar plays in the region should be acknowledged. Given the town has been identified in the Draft RSES as both an employment and service growth centre, with a high ratio of jobs to resident workers, the Regional Policy Objectives for the town should be expanded to include the following:

- Support Mullingar's role as an important employment hub by promoting economic development and clustering of related enterprises in areas such as engineering and ICT; consumer products; financial services; shared services (Multi-lingual) and R&D.

- Maximize return on existing infrastructural investments and support planned water supply upgrades.
- Realise the potential of the existing IDA presence and property in Mullingar.
- Support Foreign Direct Investment in Mullingar at an appropriate scale commensurate with its role as a Key Town and County Town in the Region.
- Enhance the existing base of both indigenous and international companies at the forefront of their field, in sectors such as engineering, robotics and advanced manufacturing.
- Advance the development of high quality enterprise and employment zones.
- Realisation of existing business parks potential.
- Further to support for the development and expansion of the Midlands Regional Hospital the need for enhanced access and connectivity for this vital infrastructure should be promoted.
- To actively support and incentivise economic development and regeneration of the town centre.
- Support the preparation of Regeneration Master Plans within Mullingar and support associated funding proposals under the Urban Regeneration and Development Fund.
- Support in the preparation of a transport study in consultation with key stakeholders such as TII, NTA, CIE, bus operators etc. in relation to the future development needs of Mullingar as a Key Town (Alternatively clarity should be provided that RPO's for Local Level Transportation Plans can be prepared by the Council immediately).
- Improve connectivity to the network of lakes in the vicinity of Mullingar.
- Developing innovative initiatives in the smart delivery of business and service solutions in Mullingar.
- Support the development of the town's assets in built, natural and cultural heritage.
- Provides for tailored policy associated with the town's potential for tourism and eventing.

#### **Addressing Infrastructural Bottlenecks and Increase Housing Supply in the Right Locations**

It is imperative that the RES provides the necessary policy to ensure that the water supply and wastewater (network and treatment) needs of the County are met in line with the Settlement Hierarchy for the County. In particular, prioritisation of new national projects to enhance Athlone's water supply and increase waste water treatment capacity should be promoted in the strategy.

In order to ensure that the transport needs of the promoted growth scenarios are provided for, the RSES policy provision for the preparation of transport plans associated with the ongoing development of the key designated towns of Athlone and Mullingar is welcomed. Focus should also be provided on the necessity for enhanced public transport linkages between these towns as well as the need for wider regional and interregional connectivity to centers such as Portlaoise, Sligo and Letterkenny. There is also need for an emphasis to be placed on the need for enhanced access and connectivity to be provided to regional assets such as Athlone Institute of Technology and the Midlands Regional Hospital in Mullingar.

Westmeath County Council endorses the preparation of a Local Level Transportation Plan for Athlone and is currently in the process of initiating this project in cooperation with Roscommon County Council and in consultation with key stakeholders such as TII, NTA, bus operators etc.

In terms of the strategic road network and connectivity within the region, it should be noted that the significant Regional Road Schemes listed at Table 8.4 'Road Projects for the Region' is deficient in that it does not include a complete overview of regional road priorities (with local improvement schemes also listed). In the absence of a comprehensive list of regional road schemes, consideration should be given to the inclusion of a new high level Regional Policy Objective to support the overall development and upgrade of strategic regional routes to enhance the connectivity of the region.

The RSES should support the provision of services such as broadband, electricity and gas into projected growth scenarios and ensure the sustainable growth of both Westmeath's key towns and the rural economy of the county.

### **Supporting the sustainable development of Small Towns & villages and rural communities**

It is of concern that the section on Small Towns & Villages in the Draft Strategy is very limited. In particular the role of smaller settlements is not clearly defined and requires supplementary policy to inform County Core Strategies. There are only two settlements in Westmeath which are classified as 'Small Towns' and remaining established settlements are not appropriately considered under the term Rural.

Whilst it is noted in the Draft RSES, that policy in relation to small towns and villages will be provided in Development Plans, it is considered that the RSES should provide at a strategic level, guidance in relation to the role, function, service provision, etc envisaged for such settlements. Furthermore, this section should be supplemented with specific Regional Policy Objectives (RPO's). At present RPO's relating to Small Towns and Villages are included under the RPO's on Rural Development. It is also considered that policy should be included in the Draft RSES in relation to the preparation of Village Design Statements and Public Realm Plans for these smaller settlements.

Reference is made in RPO 4.51 that Local Authorities shall identify in their Development Plans small towns and villages that have the potential for serviced sites. To ensure consistency across Councils, further criteria should be provided in the Draft Strategy with regard to the identification of such settlements; an overall vision for Rural Areas; clear criteria based definitions relating to the terms Rural Areas Under Strong Urban Influence, Stronger Rural Areas and areas outside Stronger Rural Areas, having regard to the provisions of the Sustainable Rural Housing Guidelines.

It is considered necessary that a vision for asset related, location specific, Rural Areas is provided in the final RSES given the unique pressures that locations in proximity to Dublin face as opposed to the rurally characterized Midlands. In this regard, whilst noting reference to rural development, there is need for the inclusion of enhanced policy which supports rural diversification and job creation across a diverse range of sectors including agriculture, forestry, tourism and rural enterprise.

In this regard, stronger emphasis should be placed on the implementation of NPF National Strategic Outcome 3 (Strengthened Rural Economies and Communities) including the provision of dedicated policy to ensure continued investment in the agri-food sector underpinning the sustainable growth as set out in Food Wise 2025 and National Policy Objective 23. The adopted strategy should provide

a greater emphasis on facilitating the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector and diversification into alternative on-farm and off-farm activities.

It is essential that the adopted strategy provides for the continued viability of rural areas.

The Draft RSES recognises that peatlands are key for climate mitigation and adaptation measures, providing important carbon sinks, water attenuation and flooding protection. Given the extent of peatlands in the Midland region (including Westmeath) and the changing nature of peat energy production (moving away from peat extraction) there is need to carefully consider alternative social and economic functions for these areas. With a strong history of energy production and an extensive electricity transmission network in place in the Midlands, potential also exists for significant peatland areas to accommodate a smooth transition to renewable energy sources.

In this regard it is noted that the Draft RSES sets out to 'support the consideration of designating a National Park for the peatlands area in the Midlands'. As part of the process of 'consideration', it is suggested that policy be provided to prepare, at a regional level, a holistic peatlands strategy in consultation with relevant stakeholders, including Local Authorities, which recognises the role of peatlands in carbon sequestration, addressing tourism, recreation, energy, commercial, community and nature conservation requirements.

This strategy should underpin Objective RPO7.19 in relation to the designation of a National Park for the Peatlands area in the Midlands providing for alternative social and economic functions linked to eco-tourism and climate change adaptation and mitigation.

It is requested that the Assembly takes on board the issues raised in this submission and we would welcome the opportunity to further discuss or expand on the matters raised above, if you so wish.

Yours sincerely



Cllr. John Dolan

Cathaoirleach