



Northern & Western Regional Assembly

**Mr. Jim Conway,
Director,
Eastern and Midland Regional Assembly,
Ballymun Civic Centre,
Main Street,
Ballymun,
D09 C8P5.**

12th April, 2019

Dear Mr. Conway,

The Assembly acknowledge your invitation of 3rd April, 2019 to make a submission on the proposed Material Alterations to your Draft RSES. At our meeting today 12th April, 2019 the Assembly resolved to issue this letter.

The Assembly acknowledge the progress being made on the adoption process and the comprehensive nature of the 139 Alterations proposed. This submission will concentrate on the seven proposals for Athlone as they have direct implications for successful adoption of our RSES.

1. Population

The population target in EMRA Draft RSES proposes 30,000 by 2031. This is a very arduous target, greater than 40% and there is no rationale provided as to why the Athlone Region Growth Centre will have a rate nearly twice that of its sister growth centre of Drogheda and 1½ times that of Dundalk. It is also significantly out of step with the Regional Growth Centres in the North West, Sligo and Letterkenny, which each have targets of 40% by 2040. This makes Athlone an outlier in terms of population targets in two regions. The evidence base to justify the 30,000 target by 2031 is not part of the Draft RSES in EMRA. It brings a sense of unreality to the Draft Strategy and this figure should be amended to a more realistic figure or timeframe, as provided within the NWRA's Draft RSES. Otherwise, this may present a difficulty in persuading public investment in infrastructure where the targets are not realisable.

The Assembly contend that the use of this target of 30,000 by 2031 has the potential to undermine the integrity of the RSES process and set a precedent elsewhere for the use of similar growth figures for other key towns, making balanced growth in such a scenario potentially very difficult to realise. The Assembly ask that the 30,000 population figure by 2031 be amended to read 2040 and to include 2026 and 2031 targets of 25,000 and 26,750 respectively. This would achieve greater consistency across the two Regions RSESs, as required in the submission by the Minister for Housing, Planning and Local Government.

2. Regional Growth Centre Strategic Plan

The DHPLG in their submission to the NWRA endorse the provision of Regional Growth Centre Strategic Plans (RCSP) by the Assembly and they particularly commend the approach taken to the Sligo (RCSP) and recommend similar approaches for Letterkenny and Athlone. The Assembly are of a mind to follow this advice as it will fully acknowledge the status of Regional Growth Centres and bestow on them the advantages that the status deserves. The legislative framework will require that following adoption of the RSES that the review of County and City Development Plans will take precedence in the review process as they are next in the planning hierarchy. At this time there is no legal provision to make an Urban Area Plan and the default approach may be to prepare a lower level joint Local Area Plan. The DHPLG also recommend that a more elaborate approach to the whole of Athlone be taken. The NWRA endorse this approach and have prepared a holistic document, which it proposes as potentially an Athlone RGCSP. The attached document aggregates the individual approaches taken by each Assembly and uses the commuting evidence, data on employment and residential development garnered through the consultation process and the environmental designations in the area.

In conclusion, the Assembly ask that the above proposal be considered by EMRA with a view to giving Athlone the same foundation as other regional centres in our respective regions. The idea of waiting for an UAP will leave Athlone behind the other regional centres in the north and west and we ask that you consider maximising the benefit that this will give to promoting the development of Athlone.

Yours Sincerely



David Minton
Director