



Draft Regional Spatial and Economic Strategy for the Northern & Western Regional Assembly

Submission from the Western Development
Commission (WDC)

February 2019

Introduction

The Western Development Commission (WDC) welcomes the publication of the *Draft Regional Spatial and Economic Strategy for the Northern & Western Regional Assembly*.

The WDC has provided input on a number of occasions during the preparation of the Draft RSES. The WDC made a submission (available [here](#)) to the consultation held in early 2018 on the NWRA *Regional Spatial and Economic Strategy: Issues Paper*. We also participated in a number of consultation workshops and in August 2018 provided views on a 'Working Draft' of the RSES.

In this submission, the WDC makes specific comments on the text and content of the Draft RSES document. Particular focus is paid to the 211 Regional Policy Objectives.

About the Western Development Commission

The WDC is a statutory body established by government to promote, foster and encourage economic and social development in the Western Region. It operates under the aegis of the Department of Rural and Community Development (DRCD). The WDC works in co-operation with national, regional and local bodies, including the NWRA, involved in western development to ensure that the Western Region maximises its full development potential. It does this by:

- analysing economic and social trends and making policy recommendations;
- promoting the Western Region through the LookWest.ie campaign;
- supporting the rural economy through facilitating strategic initiatives (e.g. renewable energy, creative economy); and
- providing risk capital to businesses through the WDC Investment Fund.

Contact Details

We are pleased to have the opportunity to make this submission and would be happy to expand on any points made if the Assembly or RSES team requires more information, supporting data or clarification. For queries please contact:

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General Comments

Here we summarise some general comments on the Draft RSES for the NWRA.

A Rural Region

- Adapting the ‘city-led development’ approach of the NPF to a highly rural region is a considerable challenge. The RSES for the NWRA Region needs to have flexibility to take an approach more suited to the rural nature of its settlement pattern.
- Rural areas provide much of the urban workforce and urban demand. Rural-urban interlinkages, including travel to work patterns, need to be given greater consideration.
- Job creation in smaller towns, villages and rural areas, as well as remote working, can bring closer alignment of housing and jobs. Building more houses in large urban centres is not the only route to greater alignment.

Implementation

- Many of the Regional Policy Objectives do not include any reference to how they will be implemented, who will be involved in leading or implementing them or the timeframe for implementation.
- A mechanism is needed to achieve the required alignment of a large array of national, regional, local, sectoral, public and private organisations, policies, priorities and strategies to ensure implementation of the RSES. It needs to be clear what will happen if the priorities of a Government Department or sectoral agency conflict with the RSES.
- The Atlantic Economic Corridor (AEC), as an agreed place-based platform for economic growth, should be designated as an Economic Zone in the RSES.
- Given the WDC’s involvement in a large number of the areas addressed in the RSES, greater reference to the WDC’s role in delivering the RSES should be included such as its co-ordination role for the AEC.

Growth Ambitions

- Adopting a ‘sector’ approach to economic and enterprise development misses out on many ‘cross-cutting’ themes e.g. digitalisation, AI, finance.
- There is an urgent need to review national Ports and Aviation policy to move away from the ‘business as usual’ approach which reinforces the dominance of Dublin Port and Airport.
- Delivering Atlantic Corridor road projects (on the N17/15) should be prioritised to take place earlier (no commitment in current NDP to begin construction before 2027).
- Some care is needed in focusing on ‘infrastructure corridors’ – this approach will not work in all circumstances and areas distant from such ‘corridors’ risk further disadvantage.
- RSES should contain a stronger commitment to the extension of the natural gas grid.
- RSES needs to focus on improving living standards for residents of the Region as a key objective in its own right, rather than simply as a way to attract companies and support business.
- More reference is needed to the potential impact of Brexit.

2.0 Strategic Analysis and Vision

2.6 The Evidence Base

The data provided on page 41 has been taken from *Ireland 2040 The National Planning Framework*, but it would be more useful if similar data for the Northern & Western Region were included instead.

The sources for this data have not been included in the RSES. It would be useful to include the footnotes or sources if this same data is to be used in the final version.

The liveability of Dublin is probably not relevant to the NWRA RSES.

2.7 Mitigating Risks and Challenges

This section would benefit from more headings and clarity in the design about what are being framed as risks.

p. 44 – The ‘Galway in Focus’ section does not seem to fit here (in the Risk section).

p. 45 – More information on the sources and data on international benchmarks which compare the stock and quality of infrastructure would be useful.

p. 45 – The map included is of poor quality and the inclusion of roads and motorways on the map make it difficult to see the renewable energy generation locations.

2.8 Growth Framework

p. 48 – There is a lack of clarity about how the ‘Growth Framework’ will be operationalised.

p. 49 – It is not clear how the five ‘Strategic Themes’ align with the six Growth Ambitions listed (or if they are the same).

p. 49 – It is noted that the Overall Strategic Plan (the RSES?) sets the Direction and Objectives, followed by Governance, Measurement and Targets. It is not clear where the details of Governance, Measurement and Targets are outlined in this Draft.

3.0 People and Places

3.2 The Region in Focus

p. 52 – While there are strong interactions between Derry City and Letterkenny, there are significant threats to the relationship between the two centres arising from Brexit, whatever form it takes.

p. 52 – 2nd last sentence ‘we have the vast Atlantic Ocean, and all that connection brings with it’. It is not clear what this means.

3.3 Place-making

p. 54 – How ‘new’ is the new ‘place-based’ approach? Often potential maybe be identifiable to ‘outside’ agencies, but just may not be activated.

p. 54 – Locational considerations, ‘internet-based’ is now more likely to be considered a universal requirement and not location specific.

Regional Policy Objective	Comment
1. Development of compact urban centres with critical mass in population; encouraging the revitalisation of urban areas and re-inhabitation of urban cores.	As these are derived from the NPF we do not have any comments.
2. Provision of connectivity and access (including national and international), enabled by physical and technology infrastructures with capacity resilience and quality. This is even more critical in a post-Brexit environment;	
3. Establishment of competitive, smart and integrated public transport networks within and between cities and urban areas;	There is a need to support accessibility to, and within, rural areas also. There is a need to support rural employment and enterprise as the NWRA is a particularly rural region with employment in sectors beyond the agri-food sector located in rural areas.
4. Nurturing of world class infrastructure and competitive services with capacity, resilience and quality;	This is a core objective and is welcome.
5. Growing our third level infrastructures, access to skills and to research, development and innovation;	This is very welcome and essential to the vibrancy of the Region.
6. Availability of property solutions – including ‘ready-to-go’ commercial properties, ‘landing spaces’, co-working spaces and flexible property solutions and affordable housing;	This would make an important contribution to the attractiveness of the Region to mobile investment.
7. Co-location or dynamic clustering. For example, in the agri-food sector, enterprises will seek to locate close to local suppliers of produce. Enabling connectivity and linkages within and between suppliers and purchasers, between enterprises and Higher Education Institutes (HEIs) is an important consideration for the RSES; and	See also comment on No.3 above
8. Development of quality of life factors and	It is important that the NWRA supports all

sense of Place, including harnessing the social, linguistic and cultural dimensions of the living experience of the Gaeltacht community.	communities.
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Effective Integration of Land-Use and Transport Planning

p. 57 – The preparation of 12 LTPs with the NTA should also consider and develop plans for travel between each of these 12 urban centres.

‘Key infrastructural projects outlined in NPF and Capital Plan... are listed in Growth Ambition 3’. Are there projects which the NWRA consider *additional* to the NPF/Capital Plan list? And if so what are they?

3.4 Urban Places of Regional Scale

p. 59 – In noting the weak urban structure in the Region it is important to recognise in the context of current residential patterns, rural dwellers form much of the labour supply in urban centres across the Region and beyond (see [WDC Policy Briefing No. 6 Commuting to Work: Rural Dwellers, Urban Jobs](#)). In this context it would be useful to incorporate the findings of research on Travel to Work areas, which recognise the wider functional areas of labour markets in the Region. This has the additional advantage of identifying a more extensive labour supply than that measured by only looking at CSO administrative boundaries. See *Travel to Work and Labour Catchments in the Western Region: A Profile of Seven Town Labour Catchments 2018¹* and forthcoming labour catchments of 26 smaller centres across the Western Region (WDC 2019 forthcoming).

End pg. 59. The last sentence is unfinished.

Regional Policy Objective	Comment
9. Deliver on the population targets for the Metropolitan and Regional Growth Centres through compact growth.	These are derived from the NPF we do not have any comments.
10.To deliver significant compact growth in Key Towns	These are derived from the NPF we do not have any comments.

p. 60 – While the ‘making of development plans for these and other areas, whilst being informed by this strategy, are primarily a function for local authorities to perform’ it is important that such plans are aligned with this NWRA strategy, rather than just being informed by it.

3.5 Smaller Towns, Villages and Rural Areas

p. 62-63 – As noted in the Draft RSES, rural areas and areas outside the influence of cities and larger towns, face challenges but also have significant potential and many opportunities for growth and development. The prioritisation in the RSES on the regeneration of smaller towns and villages is very welcome and will be aided by the delivery of housing on brownfield sites. It is essential that the approach should be to provide a range of attractive housing choices appropriate to the needs and characteristics of the place, but it is important that they are attractive to the people who might want to live there and that towns have a good mix of residents of all ages and socioeconomic groups.

¹ <https://www.wdc.ie/publications/reports-and-papers/#toggle-id-2>

Regional Policy Objective	Comment
11. Deliver at least 50% of new city housing within the existing built-up footprint of Galway City and suburbs;	As these are derived from the NPF we do not have any comments.
12. Deliver at least 30% of all new housing within the existing built-up footprint of settlements with a population of over 1,500 (excluding Galway Metropolitan Area);	
13. Deliver at least 40% of all new housing, to be delivered within the existing built- up areas of cities, towns and villages, on infill and/or brownfield sites;	
14. Deliver at least 20% of all new housing in rural areas on brownfield sites.	This is welcome as it should promote the restoration of old houses or sites which have been previously used and are already serviced.
15. To support the regeneration and renewal of small towns and villages in rural areas	This is very welcome and essential to the vibrancy of the Region.
16. Identify and develop quality green infrastructure, within and adjacent to City, Regional Growth Centres and Key Towns.	This is very important and will make an important contribution to the liveability of the Growth centres in the Region.
17. Support a coherent and consistent approach in the identification and monitoring of the scale of housing vacancy within the region, identifying vacancy hotspots and informing the setting of actions, objectives and targets in the Action Plans and how these might best be achieved.	A consistent approach to this will be very useful.
18. Local authorities to identify and prioritise a program for the provision of serviced sites within smaller towns and villages within 1 year of the adoption of the NPF. A rolling two year implementation plan shall subsequently be prepared by local authorities.	This is important and it is essential that the projected timeline is met.
19. Support the design of new/replacement/ refurbished dwellings to high energy efficiency standards that fully avail of renewable technologies, maximise solar gain, utilizing modern materials and design practices.	This is also important and relates to RPOs 45 and 187 they should refer to each other.
20. Identify suitable development opportunities for regeneration and development that are supported by a quality site selection process that also addresses environmental constraints and opportunities.	
21. Ensure flood risk management informs development by avoiding inappropriate development in areas at risk of flooding and integrate sustainable water management solutions (such as SUDS, non-porous surfacing and green roofs) to create safe places. Development plans should assess flood risk by implementing the recommendations of The Planning System and Flood Risk Assessment	

Guidelines for Planning Authorities (2009) and Circular PL02/2014 (August 2014).	
22. Local Authorities, DHPLG, OPW, and other relevant Departments and agencies to work together to implement the recommendation of the CFRAM programme to ensure that flood risk management policies and infrastructure are progressively implemented.	There is a need to implement CFRAMS as soon as possible in order to ensure confidence to support various public and private investments.
23. Within Gaeltacht Areas and Gaeltacht Towns in particular, emphasis shall be assigned to the impacts of proposed developments and their impact on the community of language and the maintenance and development of its socialisation networks.	

3.6 Delivery of Compact Growth

p. 65 – ‘Their [local authorities, other public bodies and capital spending departments and agencies of government] plans and programmes shall need to be reviewed and amended where necessary to reflect the provisions of the RSES’. The WDC agrees with this but it is not clear how these amendments will be implemented / enforced.

3.6 (A) Galway Metropolitan Area Strategic Plan

p. 68 – Reference to Galway city and county being home to ‘9 of the top 10 ICT companies’. It is not clear is this the top 10 in the world, or top 10 in Ireland, or other barometer?

p. 70 – The Vision for Galway is very welcome and while further population and employment growth will be welcome, accessibility is currently a huge challenge and will be an impediment to further growth.

p. 70-71 – It is welcome that ‘strategic sites of scale’ are named and specific land areas and planned densities are identified.

p. 72 – The identification of student demand as a specific area of housing need is welcome. The longer term demographics in the third level student population should also be considered. The volume of third level students is likely to decrease over the longer term, though there may be an increase in foreign students attending third level colleges.

p.73 – While the outline of proposals for each area is welcome, it appears it is largely stating what has been outlined in the NPF and city and county development plans.

A key issue for the development of all areas is transport accessibility, without this, increasing further densities especially for employment will be a challenge.

p. 74 – The outline of what is contained in the Retail Strategy is welcome, but it appears it is just restating the current strategy.

p. 74 Education

p. 74 – In noting there are zoned lands for new schools in areas planned for residential growth, it would be important to ensure that there is not a significant time lag between the actual provision of school places and local demand, as has happened recently in areas of Dublin.

p. 75 – Sectors of Health, Tourism and Marine Sector. All text is a statement of existing plans devised pre-publication of NPF.

p. 76 – All text is a statement of existing plans devised pre-publication of NPF.

p. 77 – Reference to a ‘new N6 Galway City Ring Road... is classified as part of the TEN-T road network in Ireland...’ It is worth clarifying that this designation refers to the ‘Comprehensive’ TEN-T network, not the ‘Core’ TEN-T network, which are different.

p. 79 – All text is a statement of existing plans devised pre-publication of NPF.

p. 79 Rail

The long term development of Ceannt Station Quarter (and the growth of the city) ‘will involve rail services expanding in frequency where there is sufficient passenger demand and usage’. The other key requirement to enable expansion in services is capacity. There will need to be additional capacity at the station and tracks.

The potential for double tracking or the more limited introduction of passing loops/bays will help increase capacity. Is the RSES advocating either of these options? Also is the RSES recommending the introduction of a rail freight service to Galway Harbour?

p. 80 Public Realm

The development of a Public Realm Strategy is welcome and that it should complement the Galway Transport Strategy. It is not clear if this will be conducted by the NWRA or other.

p. 81 Climate Change Resilience

The implementation of climate change measures and the CFRAMS Flood Risk Management Plans as key objectives of the MASP is welcome. There is an urgency needed to ensure speedy implementation of Flood Risk Management Plans so as to ensure continuing confidence in investment and growth of the city.

3.6 (B) Letterkenny Regional Growth Centre Strategic Plan: incorporating North West City Region Metropolitan Area Strategic Plan

p. 83 – It would be helpful to have more explanation/discussion of these two maps e.g. the difference between the two boundaries in the first map.

p. 84 – How was the spatial extent of the North West City Region ‘Metropolitan Area’ defined? How was the area shown in the map on p. 84 defined, is it based on commuting flows, administrative boundaries?

p. 85 (and elsewhere) – References to ‘Figure 2.1’ and all other references to figures or tables in this Letterkenny section are not correct, as the figures and tables in the Draft RSES do not have any numbering. All figures and tables in the Draft RSES should have a numbering reference.

p. 86 – What area is covered by the wider ‘North West City Region and its functional territory’? Given that it is discussed, in addition to the Metropolitan Area (which is defined) it would be useful to have an idea of its extent.

p. 86 – The reference to education qualifications seems to have an error, reference is made to Level 3 or above, but on the NFQ qualification system Level 3 is the Junior Certificate. The reference is probably meant to be to 3rd Level qualifications.

p. 93 – This Table is very useful, it would benefit if the columns had headings, also the first column is misaligned, so the sectors do not align with the projects. Some further discussion of these specific, concrete project proposals, and how each would contribute to implementing the Strategic Plan and RSES, would be helpful.

p. 94 – The meaning of this Table is somewhat unclear. Is this a statement of the Objectives of this Strategic Plan? Is this Table intended to encapsulate the objectives of the full plan?

p. 96 (and onwards) – Do all the actions listed under ‘North West Metropolitan Area’ also apply to Letterkenny, in addition to the Letterkenny-specific actions? A short introduction to the Outcomes section of how the actions listed under NWMA and Letterkenny are connected would be helpful.

p. 96, Policy 4.2, NWMA, last bullet – This is included under NWMA, however this NPF objective of 30% of new homes in built-up areas would only relate to the part of the NWMA located in the Republic of Ireland. Would the development of indicators be conducted by DCC alone, or as part of a national initiative to develop NPF indicators?

p. 98, Policy 4.3, NWMA, 3rd bullet + Letterkenny, 7th bullet – It is unclear why these references to building on the existing strengths of economic sectors are included in this section on ‘Accessing Quality Services’. What is the link between these actions and access to services?

p. 98, Policy 4.3, Letterkenny, 1st bullet – What does ‘Consolidating public services and facilities in regional centre’ refer to? Does this relate to any specific proposals?

p. 100-101 – There is some repetition of actions between Policy 5.1 and 5.2, there is also repetition within Policy 5.1 with No. 3 under NWMA repeated as No. 8 under Letterkenny.

p. 103 – On p. 91 this Outcome is listed as ‘Planning for a Vibrant Economy & Nurturing Communities’.

p. 104 – What is the purpose of this Table? What does it refer to? No discussion or reference is made in the text, either to the Table or the towns and villages listed in it.

p. 105 – The heading ‘Policy 6.2’ to be formatted.

p. 109 – It is very positive that delivering and monitoring of the strategic plan is to be reviewed annually through the NWRDG/NWSGP.

3.6 (C) Sligo Regional Growth Centre Plan

The vision for Sligo as a regional growth centre is very welcome. The plan is clearly laid out and covers the key aspects of development. We agree the eastern Garavogue Bridge will be an important infrastructure piece for Sligo, as will the development of the Western Distributor road. Improving the opportunities for pedestrians and cycling should also be integrated into the Plan. The section (3.5) on the Living Environment and the Public Realm has many positive ideas and interesting proposed developments.

Sligo, as a Regional Growth Centre, will be a third level service centre, providing key health, education, recreation, transport and enterprise services to the Region. It is important that this is made explicit so that decisions made at national level on the provision of services and service centres align with this.

Technological University status for IT Sligo as part of the Connacht Ulster Alliance, will also be an important growth stimulus both for Sligo and for the surrounding Region.

Sligo should be an important transport hub providing links to the Region and opportunities for change of mode or transport connections. It is also important that, as a key growth centre, public transport services into and out of the town are well developed and available in both early morning and late evening.

p. 129 – Natural gas: Although Sligo was assessed as a Phase 3 town, this meant that its assessment in the third report does not indicate any priority. In fact as the NPV was negative in the assessment, unless there is a significant increase in demand or funding of the amount of negative NPV, natural gas transmission will not be extended to Sligo despite the importance of this infrastructure for industrial and commercial enterprises in the town.

3.6 (D) Athlone –Regional Centre

We understand that most of Athlone is outside the NWRA Region, and outside the WDC region so we only comment briefly here.

p. 136 – ‘There is a more proactive approach in this region to the development of MASP and Regional Centres....’ It is not clear what this means or what region is being referred to (is it the Northern and Western?)

p. 136 – ‘In respect of future retail strategy for Athlone a joint approach is proposed for its delivery.’ Again it is not clear what organisations will be involved in this joint approach. It would be useful to have more explanation here.

Priorities

4. We welcome the support for the proposal to have Athlone IoT designated as a Technological University.

6. ‘Support the promotion of Athlone as a designated centre of development...’ We welcome this, but it is not clear what it will mean for Athlone. See other comments in relation to destination centre designations in section 4.5.1 sectoral Focus (Tourism).

8 ‘Support the provision of integrated signage which will identify Athlone as a single settlement’. It is not clear what this means or why it is important.

3.7 Regional Support Towns

3.7.1 Ballina

p. 138, 1st paragraph – The description of Ballina’s economy is somewhat inaccurate. The largest single employment sector for Ballina residents is ‘Wholesale & Retail’ (20% of total) followed by ‘Industry’ (14.5%) and ‘Accommodation & Food Service’ (10.8%). If the data presented in the RSES supposed to be drawn from the chart of ‘Major Sectors of Employment’ on the next page (though

not legible) it seems to show that 'Commerce & Trade' is the largest employment sector (which includes retail), with 'Other' next highest and then 'Professional Services'.

p. 138, Key Future Priorities – Several of the bullet points appear to state the current position, but do not specify what the objective is for further development. As the RSES is intended to guide the development of the Region, each priority should be framed in the context of what needs to be done to strengthen/improve that area.

p. 138, 5th bullet – The meaning of 'Build upon the extent of significant single enterprises in the town, including Ballina Beverages and Hollister.' is unclear. Is the intention to increase the impact of these specific companies on Ballina or to attract/grow other enterprises to have a similar impact on the town as these?

p. 138, 7th & 8th bullets – These two points are a repeat.

p. 138 – There appears to be an imbalance in discussion of rail infrastructure (2/3 priorities) compared with road infrastructure (1 priority). While further development of rail infrastructure and services is a priority, the vast majority of travel (freight, commuting, personal) uses the road network and improvement of the N26 should be given far greater priority.

p. 139 – The quality of the graphics on this page (and for all support towns) is very poor and almost illegible.

p. 139 – Between the 2011 and 2016 Censuses the CSO implemented a number of town boundary changes. Ballina was the town in Ireland which saw the most significant boundary change with the spatial area covered by the town considerably reduced. This means that the decline in population between 2011 and 2016 was strongly influenced by the boundary change and also the % change in population 1996-2016 is not comparing the same spatial area. It would be important to include at least a footnote with the Population chart explaining the boundary change. See <https://wdcinsights.wordpress.com/2017/06/22/regional-towns-growth-or-decline-can-we-tell/> and <http://www.mayonews.ie/news/30029-cso-confirm-ballina-s-population-and-increased-not-deceased>

The Ballina labour catchment, based on travel to work patterns from Census 2016, shows that it extends across much of north Mayo. Measuring the resident working population of the catchment shows that there is a more extensive labour supply there than that measured by only looking at CSO administrative boundaries. This is particularly relevant when considering enterprise growth. In 2016 there were over 9,000 workers resident in the catchment, significantly higher than the number of workers resident within the town boundary (3,500). See Travel to Work and Labour Catchments in the Western Region, A Profile of the Ballina Labour Catchment (WDC 2019 forthcoming).

3.7.2 Ballinasloe

The town of Ballinasloe has some key advantages which are outlined. The key future priorities should be re-ordered, starting with the sixth bullet and followed by the points related to the particular locational advantages such as the road and rail network. Following this, the points about Ballinasloe as an investment location should be noted.

The points related to the developments of the town centre and the St. Brigid's Hospital complex should then be noted.

It should be noted that service provision in Ballinasloe will be largely determined at national level and therefore these national policies will need to align to ensure the RSES is implemented. In discussing the services that Ballinasloe provides particular reference should be made to Portiuncula Hospital.

3.7.3 Castlebar

p. 142, Key Future Priorities – Several of the bullet points (e.g. 1st and 2nd) appear to state the current position, but do not specify what the objective is for further development. As the RSES is intended to guide the development of the region, each priority should be framed in the context of what needs to be done to strengthen/improve that area.

p. 142, 3rd bullet – Add reference to the proposal to develop a Technological University by the Connacht-Ulster Alliance.

p. 142, 4th bullet – The meaning of ‘Build upon the extent of significant single enterprises in the town, including Baxter.’ is unclear. Is the intention to increase the impact of Baxter on Castlebar or to attract/grow other enterprises to have a similar impact on the town?

p. 142, 9th bullet – In addition to pursuing designation of the N5 as a Ten-T ‘High Quality Road’, specific road upgrade projects e.g. N5 Turlough to Westport mentioned in Regional Policy Objective 108, should be included as a priority.

The Castlebar labour catchment, based on travel to work patterns (Census 2016), shows that the Castlebar labour catchment extends across much of central Mayo and over to parts of west Mayo including Achill. Measuring the resident working population of the catchment shows that there is a more extensive labour supply there than that measured by only looking at CSO administrative boundaries. This is particularly relevant when considering enterprise growth. In 2016 there were nearly 14,000 workers resident in the catchment, significantly higher than the number of workers resident within the town boundary (4,700). See *Travel to Work and Labour Catchments in the Western Region: A Profile of Seven Town Labour Catchments 2018*².

3.7.5 Carrick-on-Shannon

The key towns have an important role as second level service centres providing key services to their hinterlands, in areas such as health, recreation and as transport hubs as well as servicing enterprises in their localities. This discussion of Carrick-on-Shannon does not provide a long term strategic vision for the town. Carrick is an important tourist and recreation centre and is strategically located on a blueway. There is a proposal for a running track and athletic facility which could form part of the vision for the town as a recreation and amenity centre in the Region.

The Carrick-on-Shannon labour catchment, based on travel to work patterns (Census 2016), shows that there is a more extensive labour supply there than that measured by only looking at CSO administrative boundaries. In 2016 there were over 7,700 workers resident in the catchment, significantly higher than the number of workers resident within the town boundary (1,701). See *Travel to Work and Labour Catchments in the Western Region: A Profile of Seven Town Labour Catchments 2018*³.

² <https://www.wdc.ie/publications/reports-and-papers/#toggle-id-2>

³ <https://www.wdc.ie/publications/reports-and-papers/#toggle-id-2>

3.7.7 Roscommon

As above, in relation to these key towns in the RSES, there needs to be more emphasis on their role as second level service centres, providing key services to their hinterlands, in areas such as health, recreation and as transport hubs. In Roscommon the hospital currently provides important regional services.

We agree the upgrading of the N61 is an important priority.

The Roscommon labour catchment, based on travel to work patterns (Census 2016), shows that there is a more extensive labour supply there than that measured by only looking at CSO administrative boundaries. In 2016 there were over 7,200 workers resident in the catchment, significantly higher than the number of workers resident within the town boundary (2,200). See Travel to Work and Labour Catchments in the Western Region: A Profile of Seven Town Labour Catchments 2018⁴.

3.7.8 Tuam

In noting the advantage of the location of Tuam on the recently opened M17, reference should also be made to Ireland West Airport Knock to the north.

The sentence beginning 'As well as being a centre of education' might be misconstrued. The following 'As well as being the location of many schools ...' could better convey the intended meaning.

The focus on the employment and enterprise potential within Tuam is welcome. A forthcoming analysis of the Tuam labour catchment (WDC 2019), shows that the Tuam labour catchment had an increase in population size of 80.9% (+2,439 resident workers) in the decade between 2006 and 2016. This is a very large increase and in part reflects the large geographic increase in the Tuam labour catchment to the north of the town since 2006, extending into what was previously part of the Galway city labour catchment and highlights the employment growth in the town.

Tuam labour catchment as a place of work now accounts for nearly 2,000 workers, double that in 2006. Tuam labour catchment is unusual compared to most other catchments in that the single largest employer is the Manufacturing sector and accounts for 26.1% (1,421) which is double the State average (13%). This is a feature of the labour supply which could be capitalised on for future growth.

The last sentence on page 152 is incomplete.

3.7.9 OTHER RURAL AREAS

Westport

p. 154 - In addition to pursuing designation of the N5 as a Ten-T 'High Quality Road', specific road upgrade projects e.g. N5 Turlough to Westport mentioned in Regional Policy Objective 108, should be included.

The Westport labour catchment, based on travel to work patterns (Census 2016), shows that there is a more extensive labour supply there than that measured by only looking at CSO administrative boundaries. In 2016 there were over 6,300 workers resident in the catchment, significantly higher

⁴ <https://www.wdc.ie/publications/reports-and-papers/#toggle-id-2>

than the number of workers resident within the town boundary (2,500). See Travel to Work and Labour Catchments in the Western Region, A Profile of the Ballina Labour Catchment (WDC 2019 forthcoming).

Athenry

As noted, Athenry is very well located on the mainline rail network and very close to the junction of two national motorways M6 and M18. This and its proximity to Galway and Oranmore should be leveraged to promote further economic, employment and residential development.

4.0 Growth Ambition 1: Economy and Employment- Vibrant Region

4.1 Our Approach

p. 158 – ‘The region boasts over 140 FDI multinationals supported by the IDA employing over 26,000 people.’ As reference is made to employment in IDA supported FDI companies, the numbers employed in indigenous companies (supported by EI, Udarás and the LEOs) should also be included. Only giving the figures for multinationals gives them greater prominence.

p. 159 – ‘... by increasing the location and type of economic activity ...’ is this referring to a wider geographical distribution of economic activity? If so, this should be stated more clearly.

4.3 Place Based Assets

p. 163 – As 6 sub-regions are named for the NWRA, it would be important to show these in a map. None of the maps on p. 162 correspond to the 6 sub-regions defined on p. 163.

p. 164 – Each of the sectors listed in these bullet points should be examined and recommendations provided. In the remainder of the chapter only some of these sectors e.g. Tourism, are examined, whereas others e.g. Construction, are not.

4.4 Place Based Development

p. 164-165 – The Atlantic Economic Corridor (AEC), as an agreed place-based platform for economic growth, should be designated as an Economic Zone in the RSES. The WDC has been assigned a co-ordination role for the AEC by the Department of Rural and Community Development.

4.5 Sectors and Clusters

p. 167 – While adopting a sectoral approach is welcome in this chapter, it may also be useful to examine a number of cross-cutting Economy and Employment themes which will have impacts across all or most of the sectors, such as digitalisation, artificial intelligence, low-carbon and Brexit.

p. 167 – It is stated that the 8 sectors are ‘of most importance’ to the region, how is this defined? The list of sectors here does not correspond to the list of the most important sectors and clusters given on p. 164. A number of high employment sectors such as Healthcare, Education & Public sector and Construction are not included here, and neither is the Creative & Cultural sector where the region has considerable potential.

p. 167 – The 8th sector in the bulleted list ‘Advanced Manufacturing & Engineering’ is not actually included in the Sectoral Focus section.

4.5.1 SECTORAL FOCUS

The word ‘Tourism’ is missing from the heading of section 4.5.1.

p. 168 – It is not clear what the text ‘CORE ASSET: INDIGENOUS ENTERPRISE AND INNOVATION’ refers to.

p. 168 – The statement ‘Up to now, our Region has predominantly hosted domestic tourists ...’ is incorrect. The latest data from Fáilte Ireland shows that in 2017 the [West](#) region received 1.9 million overseas tourists who spent €694 million compared with only 1.6 million Irish resident trips generating €353 million. While the [Border](#) region (inc. Louth) did receive more Irish (1 million) than overseas visitors (0.7 million) in 2017, overall it would not be correct to say the NWRA region predominantly hosts domestic tourists.

p. 168 – The piechart states it shows the ‘Share of Tourists by County’ but it is not clear if it includes both overseas and domestic tourists/trips? Also it seems to show each county’s percentage share of the Region’s total, however if the data refers to overseas tourists, then combining county data to compile a ‘Region total’ would involve double-counting as the same tourist who visited a number of counties would be counted in each county. It would be important to clarify this chart. A chart showing each county’s share of Tourist Revenue may be more useful and avoids double-counting issues.

p. 169 – What is the source of the projections in the Table?

p. 169 – The Strategy includes identification of ‘Candidate Destination Towns’. It is not clear what ‘Candidate’ refers to. Is it intended that the towns included in the Draft RSES are only potential ‘Destination Towns’ and that in the final RSES some selection will have been made between these towns?

p. 169 (172-175) – It is not clear what designation as a ‘Destination Town’ (Tourism Town/Hub) involves or what benefit it has for a town. Will such towns be prioritised in investment decisions for tourism developments? Will they receive preferential weighting in decisions such as improved accessibility? Will specific plans be put in place for tourism development in such towns?

p. 169 – The NWRA Tourism Strategy is to include ‘Proposals for county based monitoring and management structures’ however no detail is provided.

p. 169 – This discussion focuses very heavily on heritage-based tourism and also the priorities of Fáilte Ireland in terms of WAW, Ireland’s Ancient East and Hidden Heartlands. These are of course very important and will be a strong focus of the Strategy. However, there is no mention of niche tourism activities that are emerging and have great potential such as business tourism and creative/cultural tourism which draw visitors to an area. Promotion of the following areas of potential tourism growth should be added as objectives:

- Business Tourism – There is no mention of business tourism. Considering Galway is an fully established Convention Bureau bringing in millions in high value tourism spending (the average business tourist will spend three times more than a regular tourist) and is filling bed nights mid-week, it should be considered and acknowledged. The Northern & Western region has a capability and unique offering for Meetings, Incentives, Conferences and Exhibitions (MICE), in particular considering the high number of 5 star castles which are very popular with the overseas visitors.
- Creative/cultural tourism (Festivals, events, literary tourism etc) – While such a sector is considered ‘niche’ and is not a top priority for Fáilte Ireland and other state agencies, communities are very heavily involved in leading such activity which is under-resourced and under-threat. Such tourism also plays an important role in place-making, community building and the unique character of the region.

p.174 – The 3rd and 4th paragraphs in the first column appear to be a general discussion of ‘Destination Towns’ and what investments are required, rather than specifically referring to Cavan Town and Monaghan Town. This text should appear earlier, before the discussion of the Destination Towns along the WAW (p. 172).

p. 176 – Prior discussion is all focused on the Destination Towns. In the RSES, is all activity outside of the Destination Towns (none of which are identified in the Ireland’s Hidden Heartlands region) considered under the heading ‘Rural Tourism’? If this is the case, it would be important to have Regional Policy Objectives specifically related to rural tourism. If it is intended that RPOs 34-36 cover rural tourism, it would be important to have a wider objective for rural tourism activities beyond water-based tourism and walking/cycling routes. It needs to also make reference to ‘community based tourism’ which is actually very strong in the region and all voluntary in nature. Festivals/events/summer schools is another key aspect of rural tourism and can be very important to bring tourism revenue to smaller towns and villages.

Regional Policy Objective	Comment
24. To protect, conserve and enhance those natural, built and cultural heritage features that form the resources on which the regions tourist industry is based. These features will include areas of important landscape, coastal scenery, areas of important wildlife interest, historic buildings and structures including archaeological sites, cultural sites including the Gaeltacht areas, arts and cultural sites and the traditional form and appearance of the built environment	
25. Promote and integrate trends in international tourism, measures will include <ul style="list-style-type: none"> • Smart tourist destinations • Tourism based on experiences • Bedrock industries (the connection of sectors of the rural economy with technologies) • Hyperconnected and multichannel digital tourism (mobile applications and services) of complex and highly automated new productive environments 	None of these trends are not discussed in the preceding section and it is not clear how the RSES can/will promote these measures. The meaning of the final bullet is very unclear.
26. Encourage and facilitate investment by Failte Ireland in the delivery of suitably scaled tourism related developments at appropriate locations that leverage increased visitor numbers through Wild Atlantic Way; Ireland’s Hidden Heartlands and Ireland’s Ancient East whilst protecting and conserving environmentally sensitive sites.	Is it intended that any specific tourism investments would be listed/identified in the final RSES? Capital investment in tourism developments within the region is the most important objective to promote the Region’s tourist industry. This objective should be expanded beyond just investments by FI, to also recognise the importance of facilitating investment by other organisations e.g. Local Authorities, Coillte, Waterways Ireland, private sector etc.
27. That the Wild Atlantic Way (WAW) touring network and visitor attractions within the Region shall be upgraded and improved to cater for the growth in visitor cars, buses, and cyclists using the route.	This objective refers to the touring network (roads) and route. Agree. However it does not refer to the Destination Towns in the WAW, which

	were the almost sole subject of the preceding discussion.
28. To ensure provision is made for the expansion in accommodation and facilities within Candidate Destination Towns. Supporting infrastructural investment will also be provided, including improvements to public realm, Transport Links, Accommodation, night time economy and the sustainably development of our natural and built heritage.	How will this be operationalised? Will such towns be prioritised for investment by FI, Local Authorities, Department of Transport? Will they be prioritised in funding decisions e.g. URDF, RRDF, Town & Village Renewal?
29. To establish potential tourist and amenity attractions of scale in the Cavan / Monaghan Region, in partnership with Fáilte Ireland, and the relevant Local Authorities.	
30. Ensure that 'Discovery Points' targeting Irelands Ancient East are included for Cavan / Monaghan as enablers for increasing bed nights and visitor numbers.	
31. To ensure provision is made for the expansion in accommodation and facilities within Candidate Destination Towns. Supporting infrastructural investment will also be provided, including improvements to public realm, Transport Links, Accommodation, night time economy and the sustainably development of our natural and built heritage.	Repeat of Regional Policy Objective 28. As this appears after the discussion of 'Ireland's Hidden Heartlands' does it refer to towns in that region? However, no 'Candidate Destination Towns' are identified for 'Ireland's Hidden Heartlands' . As the RSES Tourism Strategy puts such strong emphasis on such towns, and as this is the most recent brand and the region with the weakest tourism performance, such towns need to be identified.
32. Ensure that 'Discovery Points' targeting the 'slow tourism' market are included for key towns (Carrick on Shannon, Athlone, Ballinasloe etc) as enabler for increasing bed nights and visitor numbers.	Who would be responsible for these?
33. To upgrade Public Transport infrastructural facilities in Destination Towns, including the provision of Transport Hubs / Links, and additional accommodation.	As noted above, no 'Destination Towns' are identified for 'Ireland's Hidden Heartlands' region.
34. Develop the water based leisure sector in the region in a sustainable manner making the best use of existing and planned infrastructure and resources, in a manner that is sensitive to the natural and cultural heritage resources.	
35. To enhance access to our Tourist Assets, including the development of a Coastal Walking/cycling Route along the Western Seaboard, which extends generally along the Route of the WAW, and incorporates existing resources, such as Beaches, ports, harbours, piers and marina's. - This Coastal Route to be	Agree with this proposal. It is helpful that is a specific objective with named stakeholders.

subject to a route option analysis, and feasibility study in Counties Galway, Mayo, Sligo, Leitrim & Donegal. Stakeholders will include Fáilte Ireland, NWRA, and the relevant Local Authorities and the public.	
36. Promote the development of integrated walking, cycling and bridle routes throughout the Region as an activity for both international visitors and local tourists in a manner that is compatible with nature conservation and other environmental policies.	

4.5.2 | RENEWABLE ENERGY AND LOW CARBON FUTURE

p. 178 – Title and source of map are missing. Not clear what it shows. The map would be clearer if roads were not included on it. It might be more useful to include transmission lines on the map instead.

p. 178 – ‘It is important therefore that the region sets out its ambitions with regard to renewable energy in this context and shows its ability to help contribute to achieving national targets.’ Does this indicate that some form of regional targets for renewable energy production will be established?

p. 178 – The recently published *WDC Insights* [Electricity Transmission for Renewable: What’s needed in the Western Region?](#) contains specific data on current renewable energy generation capacity in the Western Region and demand. This may be useful to provide context for this discussion.

P. 179 – We agree that the region has a unique natural endowment of ample carbon neutral energy supplies that give us the opportunity to lead the clean economy of the future. While this sentiment is very welcome it is important that there is a clear strategy for the Region to achieve this. The four key pillars provide a useful structure for such a strategy but it needs to be operationalised.

p. 179 – ‘A regional Energy Hub could be considered to integrate focus and investment.’ This suggestion is not included in the Regional Policy Objectives, it should be included as an objective with specific detail on potential stakeholders.

p. 180 – 1st paragraph is repeat from previous page.

p. 180 – Greater community involvement in energy production, as well as development of district heating systems, should be included as a specific Regional Policy Objective.

p. 180 – The Regional Policy Objectives are welcome but there needs to be more clarity about how they will be implemented and who will be responsible. New roles for local communities are emerging, whereby they are transitioning from being passive consumers to active prosumers with the possibility of local generation, demand response and energy efficiency measures. The energy transition will require significant mainstreaming of niche social and technical innovations to succeed at the community level, for example electric vehicles, heat pumps, smart meters, sustainable energy communities, domestic PV, and battery storage.

Regional Policy Objective	Comment
39. The NWRA shall coordinate the identification of the potential renewable energy sites of scale	Is this in the context of the Renewable Electricity Policy and Development Framework?

<p>in collaboration with Local Authorities and other Stakeholders within three years of the adoption of the RSES.</p>	<p>It is not clear what identification criteria will be used and how this will be done.</p> <p>Much of the development of RE is the result of private sector investment. It is not clear how such identification of sites will relate to private investment decisions or whether this will purely relate to planning designation or zoning.</p>
<p>40. To position the region to avail of the emerging global market in renewable energy by:</p> <ul style="list-style-type: none"> • stimulating the development and deployment of the most advantageous renewable energy systems <ul style="list-style-type: none"> a. support research and innovation b. encourage skills development and transferability c. raise awareness and public understanding of renewable energy encourage market opportunities for the renewable energy industry to promote the development and growth of renewable energy businesses. 	<p>It needs to be clear who will do this and how it will be undertaken.</p> <p>Investment in necessary infrastructure should also be included in this list.</p> <p>As well as public awareness and understanding, increasing public <u>acceptance</u> of the necessary infrastructural developments required to develop the Region’s renewable energy potential, is critical.</p>
<p>41. Encourage the development of the transmission and distribution grids to facilitate the development of renewable energy projects and the effective utilization of energy generated from renewable sources having regard to the future potential of the region over the lifetime of the Strategy and beyond.</p>	<p>We welcome the objective of developing the transmission and distribution grids especially as there has been cancellation of a key development project (Grid West) and slow progress on other areas which need transmission development.</p> <p>This is very important objective, without which the potential of the Region’s RE resource cannot be fully realised. The recently published <i>WDC Insights Electricity Transmission for Renewable: What’s needed in the Western Region?</i> includes useful information.</p>
<p>42. Support the development of secure, reliable and safe supplies of renewable energy, in order to maximise their value, maintain inward investment, support indigenous industry and create jobs.</p>	<p>How will this be supported?</p> <p>We welcome the strong support for development of infrastructure and renewable energy projects in the Region.</p>
<p>43. Support the appropriate development of off-shore wind energy production through the adequate provision of land based infrastructure and services, in line with national policy and in a manner that is compatible with environmental, ecological and landscape considerations.</p>	
<p>44. Support and encourage the development of the bio- energy sector and facilitate its development for energy production, heat storage and distribution.</p>	<p>Add the following text to the end of this RPO</p> <p>‘... in particular, advocating the areas of Combined Heat and Power units integrated into district heating networks, in combination with Pyrogenic Carbon Capture and Storage (PyCCS)</p>

	or Bio-energy Carbon capture and Storage (BECCS).'
45. Promote innovative new building design and retrofitting of existing buildings, to improve building energy efficiency, energy conservation and the use of renewable energy sources in accordance with national regulations and policy requirements.	Specifically add reference to the public sector and publicly owned building stock. It is not clear if this will be the responsibility of the NWRA or other organisations.
46. Facilitate the delivery and expansion of natural gas infrastructure throughout the Region and have regard to the location of existing gas infrastructure in assessing potential developments.	We welcome this commitment to the expansion of the natural gas grid in the Region, the WDC regards it as important to the competitiveness of the Region and as an essential infrastructure. However, we feel Objectives 46 and 47 and the 'Case Study on Gas' should be moved to section 8.4 which deals with Gas Networks infrastructure. There has been no previous discussion of natural gas in this section 4.5.2 which focuses on renewable energy as an economic sector. Inclusion of the phrase '... have regard to the location of existing gas infrastructure in assessing potential developments.' should be re-considered. This could potentially further disadvantage those areas of the region which are not served by the gas network. Also, add the following text to the end of this RPO '... including the potential for gas to grid injection facilities along with anaerobic digestion facilities.'
47. Encourage and support innovative partnerships extending the gas network in the region.	Move to Section 8.4.
48. Safeguard and support the strategic role and function of existing test and development sites, for example the Atlantic Marine Energy Test Site (AMETS). The test site forms part of Ireland's Ocean Energy Strategy and is being developed in accordance with the Offshore Renewable Energy Development Plan.	We agree that AMETS is important to the development of ocean energy in our Region and that it should be a key part of any strategy for a renewable energy region.
	Add an additional Regional Policy Objective: 'To encourage and support, where appropriate, the sustainable development of smart, decentralised power generation solutions with storage elements incorporated, allowing for a greater degree of flexibility and localised

	production (CHP, Battery storage).’
	Add an additional Regional Policy Objective: ‘Communities play an important role in the rollout of renewable energy technologies. RE needs to be located appropriately to minimise the impact to the surrounding communities, and the people that live closest to the technology.

4.5.3 | AGRI-FOOD (and bioeconomy)

p. 182 – It would be better to use data specific to the Northern & Western region rather than national figures. It would improve understanding of the characteristics of the sector and the issues facing it.

p. 182 – In addition to quoting the share of persons employed in the ‘Agriculture, forestry & fishing’ sector in the Region (7.5%), it would also be important to note the numbers working in agri-food processing. Based on Census 2016, there were 7,973 people employed in the Northern & Western Region in ‘Food, Drink & Tobacco’ processing (elements of the Manufacturing sector), this was 2.3% of total employment, higher than the 2% share nationally.

p. 182 – It is important to highlight that, while farming in much of the Region is part-time, extensive and not profitable or very commercial, it nonetheless contributes to the regional economy and is important in contributing to national beef and sheep output. It has a very different character to farming in other parts of Ireland. The pattern of agriculture in Cavan and Monaghan differs from the rest of the Region and discussing this is important should also be discussed but here issues for agriculture in the rest of the Northern & Western Region.

p. 182 – While reductions in GHG emissions are, of course, very important, the survival of family farms in the Region is also critical.

p. 182 – Monaghan/Cavan – Central Border Region: The first paragraph of this section appears to refer to the entire Northern & Western region, whereas the heading refers to Monaghan/Cavan.

p. 182 – The data quoted is from the CSO Business Demography dataset, there are limits to this data, not least that it does not differentiate agri-food processing among the ‘Manufacturing’ sector and also does not include the ‘Agriculture, forestry & fishing’ sector. It would be more accurate to use the Census of Population 2016 data (CSO, Census 2016: Summary Results Part 2, Table EZ011) which gives employment in both the ‘Agriculture, forestry & fishing’ and also the ‘Food, Drink & Tobacco’ processing sectors.

As noted above ‘Agriculture, forestry & fishing’ accounts for 7.5% of total employment in the NWRA and ‘Agri-food processing’ accounts for 2.3% of total employment. For Cavan the figures are 11.3% in ‘Agriculture, forestry & fishing’ (highest in Ireland) and 6% in ‘Agri-food processing’ and for Monaghan 11.2% and 5.2%.

Giving figures for the entire ‘Manufacturing’ sector is not very helpful, also the statistic ‘25.3% of the total number of employees’ actually only refers to manufacturing’s share of employees in ‘Business Economy’ enterprises which excludes, Agriculture, Health, Education, Public Administration and Other Services sectors, so it greatly overestimates its role.

p. 183 – The potential impact of Brexit on the Agri-food sector needs to be included and discussed. Several reports have estimated the potential impact and specifically identified the Northern & Western Region as being vulnerable.

Regional Policy Objective	Comment
49. To enable the expansion of SME’s within the agri-food industry across the Region, including the expansion of companies where they are already established in our rural towns and villages.	How will the RSES contribute to this? It is not clear how these objectives will be achieved nor who will be responsible.
50. Support the upscaling of businesses, increase exports, and strengthen internal collaborations within the value chain so as to allow more products from the region to have access to transformation and export processes, and increasing the added value contribution through R&D (in both product and process) and the implementation of advanced manufacturing technologies.	
51. Support the further development of AgInnovation clusters in the Northern and Western Region - pushing convergence between farm, research, technology and commercialization.	Some discussion of the AgInnovation system, and the diagram, should be included in the preceding section.
52. To support the growth of the Region’s Agri-Food Sector, and to enable sectoral growth in rural area’s.	This seems to repeat RPO 49. It could be removed.
53. To support the Bio-Economy and to review the RSES upon the introduction of a Bio-economy strategy for Ireland, and assist in implementing measures to enable such a strategy.	No previous reference to a ‘Bio-economy strategy for Ireland’, is this planned? What is the timeframe?
54. To support the potential creation of appropriately scaled local feedstock bio-refining hubs across the Region.	<p>This issue was not referred to in previous discussion. It could have direct implications for planning decisions.</p> <p>Also the text could be revised as follows:</p> <p>‘To support the potential creation of appropriately scaled local MULTI feedstock bio-refining hubs across the Region as well as potential creation of bio-districts/clusters.’</p>
55. To create a stronger and more resilient region by protecting and stimulating gastronomy as part of our cultural heritage and also by identifying new opportunities for economic development.	<p>This Objective may sit better with the earlier Objectives under ‘Agri-food’ rather than under Bio-economy.</p> <p>It would also be useful to have some discussion on the potential of the gastronomy sector and its links with development of the tourism sector.</p>
	<p>Add an additional Regional Policy Objective:</p> <p>‘To support the future proofing of infrastructure</p>

	planning to allow for the potential upgrading of existing industrial sites to bio-refining plants while also supporting the use of bio/renewable energy for production of bio-based products.’
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4.5.4 | MARINE & BLUE ECONOMY

p. 187 – It is noted that the number of people working in fish processing in Killybegs has declined, however it could also be noted that overall the number of people in Donegal working in seafood processing increased by 4.3% between 2011 and 2016.

p. 188 – The section ‘Our Marine Regional Assets’ on p. 192 should be moved here to appear before the ‘Fisheries’ section. Many of the regional assets listed are referred to on p. 188-191 so it would be more useful if they were discussed earlier. A specific heading for ‘Marine Research’ should be added as a regional asset including the Marine Institute and Ryan Institute at NUIG, with a focus on their role in marine research and the potential for this to drive future development of the blue economy.

p. 189 – Similar to the comment in relation to Agri-food, it would be important to include adaptation to Brexit and diversification of export markets as an issue for the seafood sector.

Regional Policy Objective	Comment
56. To review, and where necessary amend, the RSES upon adoption of the Marine Spatial Plan (MSP) to ensure alignment, and consistency between land use and ocean based planning, and to ensure coordination which supports the protection of the marine environment, & growth of our Marine economy.	Agree this is an important objective.
57. To protect, upgrade and expand our key Fisheries Ports of Killybegs, Greencastle & Ross a Mhil, and to ensure adequate continued investment in facilities to ensure their ongoing success.	Galway is mentioned among the ports in the preceding paragraph but not included in the objective. If Galway is not a relevant port for Fisheries, it should be removed from previous paragraph. Ros an Mhíl is misspelt in a number of places.
58. To facilitate where possible Marine Renewable Technology Projects off the West & North West coasts of Ireland, and subject to environmental & amenity considerations (feasibility studies), & where applicable, enable National Grid connection.	It would be useful if the preceding discussion made some reference to the requirement for land-based infrastructure to support development of Marine Renewables, including transmission infrastructure, and the planning implications of this.
59. To enable the development (and / or expansion) of a number of strategic Marine Resource Innovation Parks, including locations at Greencastle, Killybegs, Co. Donegal and Cill Chiaran, Co. Galway, (Pairc na Mara), to increase aquaculture and seafood sectoral growth in the Marine Economy.	
60. To protect & preserve our Coastal Heritage, archaeological & built, and to restore / regenerate our key coastal assets, including those within state ownership (e.g. OPW) as well	Agree this is important, it would be useful to link with the water-based tourism objective included under the Tourism section (4.5.1).

<p>as Discovery Points, and Signature Points along the WAW.</p>	
<p>61. To support the ongoing upgrade & improvement of the Region’s harbours, and Ports, and ensure the sustainable development of this infrastructure to enable aquaculture and seafood industry expansion in a responsive manner.</p> <p>The upgrade of Galway Harbour & Port continues to represent key strategic priority for the Western Region, and the 100m development of the Port under IROPI (Imperative Reasons of Overriding Public Interest). The port currently deals largely in liquid bulk, however, the upgrade of the Port would allow for the port to serve a dual role as a commercial port for cargo, and also as a destination point for cruise tourism. This upscaling of the facility would increase Galway Ports influence (and spin off) across the wider region in terms of recreation & delivery of additional visitors into Galway City & beyond.</p>	<p>The text on Galway Harbour seems misplaced, it is a repeat of text under ‘Our Marine Regional Assets’ p. 192.</p> <p>The objective refers to expansion of the aquaculture and seafood industry, however Galway Port development does not contribute to this as its focus is cargo and cruise tourism.</p>
<p>62. To support the sustainable expansion & upgrade of Galway Harbour & Galway Port (under IROPI) as part of the overall vision to grow Galway as a City Region subject to environment, visual, economic viability and transportation requirements.</p>	
<p>63. To examine the potential of the Regions other main ports to expand, and enhance facilities to enable them to become ports with enhanced Regional significance in a range of area’s, including trade, fisheries, Marine Tourism & Renewables. This will be done in conjunction with all relevant stakeholders, including the relevant Local Authorities, and within the context of the MSP.</p>	<p>How does this objective relate to Regional Policy Objective 57 and 61? Both of those refer to the upgrade of ports and harbours. This Objective 63 could be earlier and replace both Objective 57 and 61. To examine the potential of the ports and harbours for a range of purposes and, based on this, to then upgrade.</p>
<p>64. To enable the expansion of our Regional assets in the Blue Economy in the following sectors:</p> <ul style="list-style-type: none"> • Marine research & innovation • Gas & Oil deposits within Irelands waters • Seafood innovation through Greencastle, Killybegs, Pairc Na Mara, and other BIM fishery centre’s. 	<p>This objective should be moved earlier in the section, along with the ‘Our Marine Regional Assets’ section.</p> <p>As recommended above, a section on ‘marine research’ should be added to the list of regional assets to provide context for this objective.</p>

4.5.5 INFORMATION & COMMUNICATION TECHNOLOGY (ICT) SERVICES

p. 193 – While the heading is ICT Services, it appears to also include ICT hardware manufacturing, so it may be better to title the section ICT and also to include some reference to the needs (e.g. skills, transport infrastructure) of the manufacturing sector.

p. 193 – While national employment figures in ICT are presented, it would be important to provide some regional context. In 2016 there were 9,436 people employed in ICT Services in the Northern & Western region plus 854 in computer manufacturing (Census 2016). The current low level of activity in the Region is one of the key issues for the sector.

p. 193 – Recent comments by ICT multinationals deciding to locate in the region e.g. in Sligo, that their decision is based on the cost pressures of locating in Dublin, as well as quality of life, would be important to include here. The increasing attractiveness of regional locations, due to current pressures in Dublin, is a key asset in growing this sector.

p. 195 – The comment ‘The great place to live arguments will be augmented by great place to work arguments if/when the NBS[P] coverage expands.’ is overly negative. While much still needs to be done in relation to the roll-out of next generation broadband across the Region, considerable progress has been made by private providers, particularly in the Region’s larger urban centres. Areas of the Region already have the necessary broadband to facilitate ICT remote workers and do so. Implying that the Region will only be a ‘great place to work’ if/when the National Broadband Plan is implemented underestimates the Region.

p. 195 – The opportunity for expanding remote working, with ICT workers who may work for a company based in Dublin (or elsewhere), but work remotely from the NWRA region (their home and/or a digital hub) is another opportunity that should be highlighted.

4.5.6 MED TECH

p. 195 – Again, while national employment figures for Med Tech are presented, it would be important to provide some regional context to emphasise the sector’s strength. In 2016 there were 11,568 people employed in Med Tech in the Northern & Western region, this was 41.8% of the State total (Census 2016). Employment in Med Tech grew by 27.7% between 2011 and 2016 in the NWRA region.

p. 195 – It is stated that indigenous companies account for over 60% of companies in the sector, however it would be important to note that these are very much smaller in scale. Nationally, for agency-assisted companies, Irish-owned Med Tech firms only account for 2.4% of total employment in the sector (DBEI, Annual Employment Survey 2017).

p. 196 – It would be important to note that the length of time required for approval of a new medical device is a minimum of 10 years and that the sector requires very high levels of venture capital investment to support new product development. These requirements often lead to indigenous Med Tech start-ups being acquired by multinationals / investors in order to get a new product to final approval.

p. 197 – Galway accounted for 28.3% of the 27,669 people employed in medical devices nationally in 2016 and the West region accounted for 36.1%.

p. 197 – Much of the text on the Galway cluster repeats p. 195, it would be better to combine both. Also the WDC Investment Fund is another agency that has made considerable investments in Galway’s Med Tech cluster.

p. 197 – It is not clear what the text under the Sligo Med Tech Cluster refers to. Are these objectives?

Regional Policy Objective	Comment
65. Support the establishment of appropriate forums to enable industry thought leaders in Ireland to share knowledge and to identify critical competencies and skills needed to align with emerging business models.	What type of forums are intended? Who would organise?
66. Target academic research, training and development of a talent pool to support industry.	This seems a general recommendation, does it only refer to ICT and Med Tech? Or more widely across sectors of the economy? A similar recommendation would be important for other sectors such as Agri-food, engineering, pharmaceuticals etc.
67. Encourage the convergence of medtech with ICT to establish the region as a global destination for connected healthcare solutions.	How would this be facilitated? Would be useful to name key stakeholders in encouraging such convergence.
67. Support funding opportunities for indigenous start-ups and growth companies.	Note: there are two 'Regional Policy Objective 67' and 'Regional Policy Objective 72' is missing. Objectives 67-69 seem to be general recommendations. Is it intended they only apply to ICT and Med Tech companies, or more widely? For many technology companies in particular, venture capital finance is the key requirement. A specific objective related to accessing venture/risk capital type finance should be added.
68. Support the development of mentoring programmes to entrepreneurs.	
69. Enable peer learning and exchange platforms to develop business links, address business concerns, exchange views and promote best practice.	
70. Support land use designation that will allow for the expansion of MedTech and Associated businesses	No reference to land use has been made in this section, this objective should be clarified.
71. Support the provision of educational and research opportunities that will foster the continued success of MedTech Industries	

4.5.7 | RETAIL

p. 198 – In discussing policy in this area, it would be useful to include reference to the 'Town and Village Renewal Scheme' which was intended to help town centres to fund initiatives developed through the 'Framework of Town Centre Renewal'.

p. 198 – Among the best practice examples, it would be useful to also add Westport which is widely acknowledged as a best practice example of successful town centre development.

Regional Policy Objective	Comment
73. To support retail in town and village centres through the sequential approach, as provided within the Retail Guidelines, and to encourage appropriate development formats within the town and village centres.	
74. To encourage new (and expanding) retail developments to locate close to public transport corridors, to enable sustainable travel to and	As well as public transport, it would be important to note the importance of locations with walking and cycling access.

<p>from our Town & Village Centre's, where applicable.</p>	
<p>75. To adopt a presumption in favour of the re-use, and restoration of town centre buildings for use as retail space, subject to satisfying other planning criteria & standards.</p>	
<p>76. Promote the development of town and village revitalization learning programmes in collaboration with interested stakeholders, including the identification of potential funding streams.</p>	<p>This is a very useful recommendation and some of the additional explanation on p. 198 should be incorporated here to expand. E.g. 'The rollout of a peer learning programme shall be developed by the NWRA in collaboration with interested stakeholders, which will be of benefit and may assist in supporting the vibrancy and vitality of the core retail areas of town centres.'</p>

5.0 Growth Ambition 2: Environment- Natural Heritage

5.1 Economic Progress and Environmental Impacts

It would be useful if this was more specific about the changes which have been taking place. A discussion of how conservation can be balanced with development would be helpful.

5.2 Environment and Heritage

It would be useful to provide the data on the NWRA contribution to CO₂ emissions and on carbon sinks.

5.5 Natural Assets

p. 209 – Lough Ree Forest park should be Lough Key Forest Park.

5.6 Cultural Heritage

This section really only focuses on the Gaeltacht and Irish language but there are other aspects to culture in the Region and to cultural heritage (including those relating to creative industries, craft, digital media, traveller communities).

5.8 Our Natural Networks

It would be useful to include more information about the green and blueways which are currently being funded in the Region, see for example: <https://drcd.gov.ie/wp-content/uploads/ORIS-M2-January-2019.pdf>.

Bogs and Peatways are key regional assets and it is welcome that there is a strong emphasis on their protection and on options for future use.

Regional Policy Objective	Comment
5.3 OUR LANDSCAPE	
77. Protect, manage and conserve the quality, character and distinctiveness of our landscape and seascape.	
78. The Assembly supports co-operation and co-ordination between local authorities in determining landscape character along their borders. A targeted review should be undertaken to ensure consistency in classification and policy in adjoining areas of similar character. The NWRA will assist in collaboration and co-ordination.	
79. Encourage the prioritization of Site Specific Conservation Objectives (SSCO) for all sites of Conservation Value, designated in EU Directive (i.e. SACs, SPAs) to integrate with the development objectives of this Strategy	
80. Ensure efficient and sustainable use of all our natural resources, including inland waterways, peatlands, and forests in a manner which ensures a healthy society a clean environment and there is no net contribution to biodiversity loss arising from development supported in this strategy.	It is not clear who will be responsible for this, who will undertake it and how it will be measured.

5.5 NATURAL ASSETS	
81. Conserve and protect designated areas and natural heritage area. Conserve and protect European sites and their integrity.	Who will be responsible for implementing these RPOs?
82. Develop awareness and create greater appreciation of the benefits of our natural heritage, including on the health, wealth and well-being of the regions ecosystem services.	
83. Ensure that all plans, projects and activities requiring consent arising from the RSES are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate	
5.6 CULTURAL HERITAGE	
84. Promote, enhance and protect the linguistic, cultural, and heritage value of our Gaeltacht Communities. Develop the Gaeltacht brand as a tool to provide competitive advantage.	Who will be responsible for this?
85. Support the provision of low-cost, shared workspaces for the cultural sector; Promote the provision of training, education and professional development opportunities for the cultural sector;	This seems to be the responsibility of Údarás na Gaeltachta. Will NWRA oversee this, or will it be stated that this is being done by Údarás?
86. Support the provision of adequate broadband capacity that enables the further development of the vibrant film/video and digital media sectors in the region in particular and that facilitates collaboration between cultural sector practitioners - regionally, nationally and internationally;	<p>There is no reference to this broader aspect of cultural heritage in the preceding text.</p> <p>There is no mention of The Western Region Audiovisual Producers Fund (WRAP) http://www.galwayfilmcentre.ie/category/wrap-fund/</p> <p>There is no mention of the WDC Creative Micro-Loan Fund which is open to sole traders, partnerships, businesses, co-operatives and groups operating in the creative industries sector, and provides loan finance ranging from €5,000 to €25,000. https://www.wdc.ie/wdc-investment-fund/creative-industries-micro-loan-fund/</p>
87. Support the provision and/or upgrade of cultural facilities (Eg. multi-purpose arts centres, theatres, galleries, libraries, museums etc) where the public, and visitors to the region, may enjoy and participate in cultural activities, with particular priority given to the City of Galway, Regional Growth Centres, Key Towns and to Gaeltacht Towns.	It is not clear who will be responsible for this.
88. Support and assist the formulation and implementation of Irish Language Plans through the lead agency, Údarás na Gaeltachta, across the Gaeltacht areas and within Gaeltacht Service Towns, as defined under the Gaeltacht Act 2012.	

5.7 OUR NATURAL HERITAGE	
89. To protect, enhance and harness the potential of the Region’s Cultural and Heritage assets.	It is not clear how the NWRA will do this, or if it is the responsible body.
90. Support the conservation of the Region’s National Monuments and built heritage, being structures that are of special architectural, historic, archaeological, artistic, cultural, scientific, social or technical interest that are of Regional Significance or above.	
91. The Assembly support a targeted programme of National Monument sites to be developed in a manner that shall enhance the visitor experience to the region and protect the archaeological and architectural integrity and character of such sites. Priority shall be given to potential clusters of sites that are well connected focusing upon supporting the Wild Atlantic Way and the Hidden Heartlands tourism brands.	
92. Establish a network of Historic Towns and Villages across the region through a Regional Fora of stakeholders that shall be co-ordinated by the NWRA in collaboration with Local Authorities, the Heritage Council, Fáilte Ireland, the Department of Culture, Heritage and Gaeltacht and other relevant stakeholders. The purpose of the Fora shall be to promote awareness and invest in a regional network of Historic Towns and Villages, thereby maintaining heritage integrity and improving the quality of our historic towns and villages for residents and tourists.	The establishment of this Forum is very welcome.
93. Support the adaptation and re-use of heritage buildings and places	It is not clear how this will be done.
5.8 OUR NATURAL NETWORKS	
94. The advancement, and growth of national and regional Greenway routes that shall include a number of high capacity flagship routes in this region, and which can be extended and/or link with local Greenways and other cycling and walking infrastructure;	More information should be included on how these RPOs will be implemented.
95. Prioritisation of Greenways of scale and appropriate standard that have significant potential to deliver an increase in activity tourism to the region and are regularly used by overseas visitors, domestic visitors and locals thereby contributing to a healthier society through increased physical activity;	
96. the development of local businesses, and start ups in the vicinity of Greenway Developments.	
97. The development of Greenways in	

accordance with an agreed code of practice.	
98. The Assembly supports the collaboration development of blueways and greenways including feasibility and route selection studies in order to minimise impacts on environmentally sensitive areas.	This would be useful
99. To support, and facilitate the continued development of the Region's Blueways along existing waterways and through the reopening of disused waterways, such as the Ulster Canal.	This would be useful.
100. To promote, support and enable collaborative networks to realise the economic opportunities presented by Blueways.	This would be useful
5.9 FORESTRY & WOODLANDS	
101. To protect, and conserve our designated peatlands and bogs for reasons of biodiversity, ecosystem services, carbon sinks, areas of habitat importance, amenity and Landscape value.	These are unique and important to the Region so this is an essential area for action.
102. To establish a Regional Fora that shall prepare an audit of worked out Bog's and peatlands within our Region and to identify strategic sites and propositions of regional value, including but not limited to areas such as renewable energy, tourism, biodiversity, climate mitigation, education, recreation and amenity.	The establishment of this Forum is very welcome. An audit of these assets would be very useful.
103. A Regional Fora to be established to set out a framework for sustainable afforestation across the Region that enables government policy to grow the sector and that addresses community concerns and perceptions.	The Forum is very welcome. It should also consider issues that address local access to Forests, community use and species diversity etc.

6.0 Growth Ambition 3: Connectivity- Connected Region

6.2 Transport

p. 221 – Transport is a key enabler of economic activity but transport is also important for other purposes such as accessing social, leisure and educational facilities. This transport function should be noted also.

p. 222 – Key Challenges.

Point no. 4 ‘Building on this regions freight capacity’, is a little vague. Does this refer specifically to rail freight?

Point no.5 is also vague. Does this refer to airports/ ports? Which ones?

When referring to the TEN-T designation it would be useful to identify which specific designation, Comprehensive or Core, to avoid confusion e.g. TEN-T route from Derry to Letterkenny, Sligo to Galway is part of the comprehensive network.

p. 223 – Some of the statistics related to commuting time relate to the fact that many workers are travelling longer distances to work. (WDC 2018, Travel to Work and Labour Catchments in the Western Region).

p. 224 – The Role of Transport: Description of the value and need for the Galway Transport Strategy is useful, but the key is implementation.

6.3 Transport Investment Priorities

p. 225 – Along with the various public transport providers, there is a significant role for private operators, especially bus operators.

6.4 International Connectivity

p. 226 – The sectoral National Ports Policy (2013) and National Aviation Policy (2015) were devised well before consideration and publication of the National Planning Framework. Given that the NPF goal is to move away from ‘business as usual’ and in the meantime there is ever greater concentration of traffic at Dublin Port and Airport, the RSES should advocate for revised National Ports and Aviation policies. A recent paper by the Irish Exporters Association also highlights concerns about the continuing dominance of Dublin (Port and Airport) and the need for alternatives for the exporters in the West.

Regional Policy Objective	Comment
INTERNATIONAL CONNECTIVITY	
104. Support the development of the SDZ at IWAK to make it attractive for aviation related industries to be created and prosper.	Welcome support to help growth of IWAK but ultimately there should be a review of National Aviation Policy to help direct growth away from ‘business as usual’ and the ever increasing dominance of Dublin Airport.
SEA PORTS	
105. Support, enhance and enable investment in the development and diversification of our network of key Airports and Seaports/ Harbours, providing them with adequate and efficient capacity and ensuring they have high quality	Agree with this objective. As the National Ports Policy was written well before the publication of the NPF, there should be a review of National Ports Policy to help

sustainable transport connectivity, including road, rail, cycling and pedestrian infrastructure, as appropriate and subject to environmental considerations.	direct growth away from ‘business as usual’ approach and the ever increasing dominance of Dublin Port. This is even more important in the context of Brexit so that opportunities at ports such as Rosslare, Cork, Shannon Foynes and Galway are considered.
106. Support the development and the protection of the fisheries harbours in the context of Brexit and its effect on waters available for Irish trawlers to fish.	Agree with this objective.
107. Support the development of utilisation of data & insight driven technology, sensors and the IoT in our airports, seaports / harbours in their transition towards becoming Smart Ports.	Agree with this objective.

6.5 Road Networks

p. 230 – We welcome the recognition of the importance of regional and local roads for accessibility in the Region.

p. 230 – ‘It is recommended where necessary that confirmation of consistency with the RSES is obtained from the Regional Assembly in advance of a road authority seeking development consent for a particular road scheme.’ Is there any legal or regulatory requirement for this? Is there a requirement that road developments should be consistent with the RSES?

Regional Policy Objective	Comment
<p>108. The following projects shall be delivered to an appropriate level of service in the short term and in any case by 2027 having regard to the standard in the NPF of an average inter-urban speed of 90KPH</p> <ul style="list-style-type: none"> • N6 Galway City Ring Road • N4 Collooney to Castlebaldwin • N5 Ballaghaderreen to Scramogue and Turlough to Westport • A5 Road Development • N59 Moycullen Bypass • N56 Dungloe to Glenties and Mountcharles to Inver 	<p>These are the list of projects in the NWRA region included in the current NDP.</p>
<p>109. The following projects shall be progressed through pre-appraisal and early planning in the short term and shall thereafter proceed to construction and be delivered to an appropriate level of service within the lifetime of the RSES:</p> <ul style="list-style-type: none"> • N2 Clontibret to the Border connecting to the A5 • N2 Ardee to south of Castleblaney • N3 Virginia Bypass • N13 Ballybofey Stranorlar Bypass • N13/N14/N56 Letterkenny Bypass and Dual Carriageway to Lifford • N17 from N4 interchange to N5 interchange 	<p>The NDP (p. 41) states of these projects ‘The following sections of the national road network will be progressed through pre-appraisal and early planning during 2018 to prioritise projects which are proceeding to construction in the National Development Plan.’ It is unclear the timeline for construction of these projects, if they are intended to be constructed after the life of the current NDP (after 2027)?</p> <p>The RSES must state very clearly that these projects are a key priority for the NWRA region and should be progressed sooner than 2027 (or</p>

<ul style="list-style-type: none"> • N15 Sligo to Bundoran • N13 Manorcunningham to Bridgend/Derry 	<p>2030 as end of RSES).</p> <p>The NDP itself states (p. 40) ‘A particular priority in this is substantially delivering the Atlantic Corridor, with a high quality road network linking Cork, Limerick, Galway and Sligo.’ But then places all projects along the Atlantic Corridor (N13, N17, N15) in this category of pre-appraisal and planning, with no commitment to commence construction of any section of the Atlantic Corridor during this NDP. The RSES needs to very clearly state the high priority of the Atlantic Corridor and the need to progress construction of these schemes during the life of the current NDP.</p> <p>The N4 Carrick on Shannon scheme, which is included in this list on p. 41 of the NDP, is missing from the list in the RSES and needs to be included.</p>
<p>110. The delivery of the following projects shall be pursued through pre-appraisal, early planning and thereafter to construction as priority projects to be delivered to an appropriate level of service in the medium term:</p> <ul style="list-style-type: none"> • N59 enhancement (N59 Westport to Mulranny; N59 Ballina to Crossmolina; N59 Ballina Relief Road; N59 Oughterard By-pass; N59 Clifden to Oughterard) • N61 Athlone to Boyle improvement • N63 Roscommon to Longford improvement • N56 Inver to Killybegs • N15 Stranorlar to Lifford • N13 Stranorlar to Letterkenny 	<p>The NDP states (p. 40) ‘In addition, there are sensitive areas where their environmental and tourism value mean that major new alignments are neither feasible nor appropriate. On those routes, there will be targeted improvements to address bottlenecks and enhance safety, for example, the N59 in Mayo on the Wild Atlantic Way and the N26 linking Ballina to the N5.’</p> <p>However the N26 linking Ballina to the N5 is missing from this list, even though it is identified as a ‘Key Priority’ for Ballina (p. 138). The N26 should be added to this list.</p>

6.6 Rail Networks

While intercity rail services can be a sustainable alternative for longer distance trips, the rail service can also be an important transport mode for shorter distance commuting, such as the current route from Athenry and Oranmore to Galway city. There may be potential for further expansion of commuting services along the existing intercity lines, serving Galway, Athlone, Sligo and other centres given their planned population and employment growth.

p.233 – ‘Many gaps exist within the region’s rail network’. The line from Athenry to Claremorris is mentioned, as well as a possible rail service to Letterkenny/Derry. Are there other gaps?

Regional Policy Objective	Comment
113. To seek commencement and completion of the review of the Western Rail Corridor project as a priority for passenger and freight transport.	The Review should be completed and published to inform future transport planning.
114. Promote the upgrade of the capacity of the Athlone-Athenry-Galway rail line, including the	Agree with this objective.

provision of dual tracks and support provision of increased service stops between Athlone and Galway.	
115. (a) It shall be an objective to deliver the Athenry - Tuam - Claremorris - Sligo - Rail to an appropriate level of service and to a standard capable of facilitating passenger and freight transport. (b) It shall be an objective to progress through pre-appraisal and early planning the extension of railway from Athenry - Tuam - Claremorris - Sligo.	This objective is contingent on the results of the Review referred to in RPO 113.
116. Support provision of Smarter Travel infrastructure.	Agree with this objective. Smarter travel programmes should seek to improve rural transport and rural-urban transport links as well as serving urban centres.
117. Promote enhancement of the capacity of the Sligo to Dublin rail line.	Capacity and service level improvements are needed across all lines operational in the Region; Galway-Dublin, Sligo-Dublin, Ballina/Westport/Castlebar-Dublin.
118. Investigate the feasibility of extending the rail network to the North West City region from Sligo and Dublin.	It is not clear if there are two proposals here or one, extending the line from Sligo northwards to Letterkenny/Derry?
119. Support the development of a Strategy for the electrification of the rail network.	This is welcome, but to date any plans for electrification of rail lines have not included lines serving the NWRA Region. The investment plans of transport providers such as Irish Rail will need to align with and support the NWRA RSES objectives.

6.7 Bus Network

p. 234 – In relation to bus services it states ‘Investment in these services will be focused on improving connectivity between regional settlements, including Galway City and Dublin, and enhancing the reliability and the level of service within and between key settlements.’ At present the Galway City to Dublin bus service is the most well-served in terms of public and private operators and busiest bus service in the region. When discussing the need to invest in bus services, it would be more appropriate to highlight bus services which are currently under-developed and under-served. Bus routes which are currently unattractive to private operators should be a key investment priority under the RSES. Given current pressures on public bus services i.e. Bus Eireann, which are by far the most widely dispersed in the Region, public bus services should be a priority under the RSES.

Regional Policy Objective	Comment
120. Utilise smart technology to provide for enhanced service experience for customers;	If this requires infrastructural investment e.g. display boards at bus stops, who would be undertaking the investment?
121. Reduce dependency on the fossil fuel powered vehicles;	
122. Undertake network reviews for city, regional centres and support towns across the region, with a view to providing local bus services;	Who is to undertake these reviews? NTA? Would this cover public, private and community provided bus services? Would bus services for specific purposes e.g. school buses, HSE buses,

123. Review bus services within and between settlements, including the rural transport programme, to provide for enhanced and more connected provision of public transport service;	be included?
124. Provide new interchange facilities and enhanced bus waiting facilities together with enhanced passenger information, utilising smart technology in appropriate circumstances.	<p>Agree with this objective. Who would undertake the investment in these facilities? Would it be done by Local Authorities, Bus Eireann, the NTA? Would the enhanced bus waiting facilities only be present at interchange facilities?</p> <p>Given the many interconnections at Charlestown (e.g. Bus 22 Dublin-Ballina and Bus 64 Derry-Galway (serving IWAK, Bus Feda Gweedore-Galway) a bus shelter at Charlestown should be included as an example.</p>

6.8 Rural Transport

Regional Policy Objective	Comment
125. To provide sustainable travel which will be supported by providing walking and cycling facilities (including Greenway and Blueway projects) as a priority across the region.	This should also focus on cycle and walk ways to allow people including local residents, to access work, shops and other amenities in a safe and pleasant manner when on foot or cycling. Sometimes greenways and blueways seem to be particularly focused on tourism development, which is welcome but there is a need to deliver for the local community.
126. Support Cross-border sustainable transport, including but not limited to the delivery of the following: <ul style="list-style-type: none"> • North-West Multi-modal Mobility Hub; • North-West Greenway; and • Ulster Canal Greenway. 	Agree with this objective.
127. In addition to the foregoing, specific transport network supports shall be provided for the Islands that shall provide for safe access by sea and include but shall not be limited to the following: <ul style="list-style-type: none"> • Improved pier infrastructure on Inis Oír and Inis Meáin in the Aran Islands and at Machaire Rabhartaigh; and • New passenger ferry vessel for Oileán Thoraí. 	

6.9 Enabling Plans: Local Transport Plans

Regional Policy Objective	Comment
128. The Assembly supports the collaborative preparation Local Transport Plans lead by local authorities and including other stakeholders for Athlone, Letterkenny, Sligo Town, Cavan Town, Monaghan Town, Castlebar, Roscommon Town, Ballinasloe, Carrick-on-Shannon, Donegal Town, Tuam, Ballina and other areas as may be determined.	The preparation of the Local Transport Plans is very welcome. Local Transport Plans should have a clear focus on sustainable transport in the Plan area, including pleasant, accessible, safe options for walking and cycling either on

129. Support the inclusion of policies, objectives and measures which emerge from Local Transport plans into Development plans, local area plans and Strategic Development Zone Planning Schemes	<p>footpaths or roads, which encourage people to use these modes of transport in local towns.</p> <p>There should also be on integration with transport modes serving the wider hinterland such as local and inter-city bus services.</p>
130. The management of space in town and village centres should deliver a high level of priority and permeability for walking, cycling and public transport modes to create accessible, attractive, vibrant and safe, places to work, live, shop and engage in community life.	
131. Planning at the local level should promote walking, cycling and public transport by maximising the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services, and other services at the local level such as schools;	
132. New development areas should be permeable for walking and cycling and the retrospective implementation of walking and cycling facilities should be undertaken where practicable in existing neighbourhoods, in order to a give competitive advantage to these modes. Prioritisation should be given to schools and areas of high employment density;	

ELECTRIC VEHICLES (EVS)

Regional Policy Objective	Comment
133. Reduce dependency on the fossil fuel powered vehicles and have regard to the National Policy Framework for Alternative Fuels Infrastructure for Transport	These are to be welcomed but it is not clear who will be responsible for achieving them.
134. Promote deployment of targeted, convenient and safe recharging infrastructure across the region to meet the changing needs of the electric vehicle with particular emphasis in public parking areas and employment locations.	

6.11 Broadband Connectivity

p. 239 – When referring to broadband speeds it would be useful to distinguish between download and upload speeds. Some users require higher upload speeds than typically available. The NBP refers to minimum download speeds of 30Mbps and upload speeds of 6Mbps.

Much of the text and maps on pages 239, 240 and 241, is a detailed description which is not needed.

Regional Policy Objective	Comment
DIGITAL INFRASTRUCTURE	
135. A feasibility study will be undertaken to explore economic opportunities arising from transatlantic cable connectivity through a	This is welcome.

Regional Partnership approach.	
NATIONAL BROADBAND PLAN	
136. Support the roll-out of the National Broadband Plan and grow the regional digital economy;	This is to be welcomed as a matter of priority. Delivery should commence in the NWRA region.
137. All new development to provide specific ducting to enable broadband infrastructure	Agree with this objective.
138. The Assembly supports the provision of Wifi Hotspots at appropriate publicly accessible locations;	Agree with this objective.
139. Provide information to businesses on the opportunities available through broadband connections;	Agree with this objective. Is this to be the role of the LAS or NWRA?
140. Encourage the utilisation and further development of our Municipal Area Networks	Agree with this development.

6.12 Our Smart Region

Section 6.12 lacks structure and coherence. Extending over 11 pages (p. 237, 243- 254), there is much discussion and overlap which lacks structure and coherence. The extent of focus also contrasts with the limited discussion of other issues in the RSES e.g. childcare.

It might be better to start with the Concept (p. 248), which might include ‘why a Smart Region’ (p. 244) and then follow on with ‘Foundations for a Smart Region’ (p. 247).

Regional Policy Objective	Comment
SMART ENVIRONMENT	
141. Promote technology interventions and best practice that enhance sustainability in public places, parks, waterways and building management	Agree with this objective. Individual authorities and stakeholders will need to take leadership.
142. Encourage policies that promote effective resource management through the application of new technologies, data and environmental management.	Agree with this objective.
143. Encourage, pilot and collaborate with stakeholders to adopt technologies that improve energy and resource sustainability across the region.	Agree with this objective.
144. Encourage the adoption of digital technologies and service platforms across the region to improve asset management and service delivery.	Agree with this objective.
SMART ECONOMY	
145. Leverage the Smart region approach to secure EU and private financing to accelerate business growth and economic development.	Agree with this objective. The appropriate Lead bodies should be named.
146. Actively develop the regional innovation ecosystem’s capacity to nurture businesses, artists, creatives and innovators and generate economic growth in key industry sectors aligned with Enterprise 2025 Objectives and NDP investments.	Agree with this objective. The appropriate Lead bodies should be named.
147. Promote a local and regional ‘Open Data’ policy and build a Regional Data Infrastructure platform - data is at the basis of the smart approach. A data infrastructure is a shared technological platform where data can be collected, processed, shared and	Agree with this objective. The appropriate Lead bodies should be named.

analysed from across the region.	
148. To enable Public and Private Sector creation of a digitally connected innovation corridor connecting existing, emerging and new incubation spaces (examples include: Portershed, Building Block etc.) that will attract businesses and industries working in the digital economy and creative industries	Agree with this objective. The appropriate Lead bodies should be named.
SMART MOBILITY	
149. Develop and deliver strategy and infrastructure to enable the adoption and integration of future modes of transport and mobility	Agree with this objective. The appropriate Lead bodies should be named.
150. Continue to encourage Active Travel initiatives and where possible leverage technology and digital platforms to enhance the delivery of cycleway and walking infrastructure, particularly in our urban centres	Agree with this objective. The appropriate Lead bodies should be named.
151. Promote values and policies that make it easy to commute between home, work and school across the region in a way that contributes to a healthy, attractive and climate-friendly region	Agree with this objective. Many of these policies are quite simple and require limited if any technological intervention (walking, cyclepaths)
SMART GOVERNMENT	
152. Understand, advocate for, and facilitate the existing and future infrastructure needs of our urban areas, wider region and beyond – immediate priorities include access to ultra-fast and rural broadband initiatives.	Agree with this objective. Is this not similar or the same as RPO 136?
153. Encourage the exploitation of data and information pertinent to new spatial forms and to consider enhanced infrastructural requirements for a fully connected region.	Agree with this objective.
154. Create and adopt policy frameworks, open standards and information technology platforms to make appropriate city datasets accessible and available to increase productivity and growth	Agree with this objective.
155. Establish a “Smart Region Hub”: Build on the Smart Places foundation in order to craft a vision for our sustained & integrated regional Smart future	Agree with this objective. Will this be the responsibility of the NWRA?
SMART PEOPLE	
156. With partners in IDA and other relevant agencies seed the architecture for a digital skills platform	Not clear what is involved specifically in this objective.
157. Enable access and utilisation of public data to improve planning, stimulate economic development, encourage people into business.	Agree with this objective. The appropriate Lead bodies should be named; LAs/ NWRA?
158. Within 2 years, the Assembly, along with WDC, IDA, and other relevant agencies will construct the principles for the creation of a Digital Skills Platform. This Platform will enable access and utilization of public data to enhance planning, economic growth, and encourage entrepreneurship & business startups.	It is our understanding that this refers to the Smart Atlantic Way initiative. If this is the case, this Objective should be amended to replace reference to ‘Digital Skills Platform’ with Smart Atlantic Way.
159. Through Local Economic and Community Plans encourage access to digital technologies to reduce the digital divide, improve digital literacy and ensure	Agree with this objective. It would be important to align and liaise with existing initiatives already underway to improve

equitable community access	access to digital technologies to reduce the digital divide, improve digital literacy and ensure equitable community access.
160. Use digital platforms to enable improved communication and engagement between citizens and local authorities including fostering the capacity for community to influenced decision-making	Agree with this objective.
161. With our partners in Local Government / Local Development promote the benefits of highspeed broadband to ensure that uptake and use is as high as possible	Agree with this objective. Is this not similar to RPO 159? It should align with the delivery of various initiatives designed with the same purpose, some of which are undertaken by the voluntary sector.
162. To assist in the establishment of New 'Technology and Innovation Poles' (TIPs) encouraged in our Metropolitan and Regional Growth centres.	Agree with this objective and if successful it should be extended to other centres in the Region beyond those that are named.

7.0 Growth Ambition 4: Quality of Life – Inclusive Region

p. 256 – The references to ‘Best Place to Live’ and ‘Coolest Place on the Planet’ relate to a very specific time/year and may not be appropriate to include in the opening statement of this chapter for a RSES with a timeframe to 2030.

7.1 INTRODUCTION

p. 257 – It is stated ‘However, inclusive growth and development remain primarily an aspiration. No systemic framework has emerged to guide policy and practice.’ In the context of discussing ‘Inclusive Growth’ in the RSES, it would be important to reference the ‘Updated National Action Plan for Social Inclusion’

<http://www.welfare.ie/en/downloads/Updated%20National%20Action%20Plan%20For%20Social%20Inclusion%202015-2017.pdf> which provides the overarching policy framework for social inclusion, as well as the Social Inclusion and Community Activation Programme (SICAP) implemented by Pobal which operationalises social inclusion measures at regional and local level.

p. 258 – WHY PLAN FOR A GREAT PLACE TO LIVE

The first paragraph of this section (below) is highly inappropriate for a section on ‘Inclusive Growth’. It seems to regard people solely as ‘economic actors’ (workforce or consumers) with their role/purpose seen only in the context of how they contribute to the economy, rather than as individuals in a society. While other sections of the RSES may have a strong economic focus, the section on ‘Inclusive Growth’ must focus on people as individuals in society and discuss how the RSES will contribute to improving their quality of life and living standards. The purpose of planning for a great place to live is for individuals living in the region to have a better quality of life, it is not to ‘meet the needs of major employers’.

‘If we do not plan to meet the needs of major employers through the provision of a skilled and healthy workforce with high levels of participation and housing provision in proximity to employment locations, then we will stifle industry productivity, expansion, and retention. If people are unemployed or underemployed, they cannot purchase many of the goods and services the economy produces, hurting small businesses and entrepreneurs. Furthermore, inefficient use of land and infrastructure — including the congestion it can create — hampers job access, limits productivity, and reduces property values.’

7.2 INCLUSIVE GROWTH

p. 259 – Again this section has an over-focus on the needs of employers, the labour force and economic growth, rather than broader issues of societal development, equity and inclusiveness. Elsewhere in the RSES (notably Chapter 4) it is appropriate to primarily focus on economic concerns, however the Inclusive Growth section should focus on individuals and an inclusive society. The NWRA region has a labour force participation rate of 59.5%, which means that 40% of its adult population (15+ years) are outside the labour force (retired, students, home duties, unable to work due to disability etc.) and the strong focus here on the labour force excludes 40% of region’s adult population, as well as all children under 15 years.

7.3 HORIZONTAL AIMS

p. 261 – Again, phrases such as ‘Lack of skills, unemployment and crime have a direct impact on businesses and regional productivity. Persistent exclusion leads to wasted potential, lower demand for goods and services, and costly pressures on welfare and public services’ implies a highly

economistic focus, rather than a person-centred/societal/equity view of the need for inclusive growth.

7.4 POLICIES TO FOCUS-ON

p. 264 – TALENT. There appears to be some content (map/text) missing from this section, the final paragraph seems to refer to some data or a map that shows education/skill levels in the region?

Regional Policy Objective	Comment
163. Support the co-ordination of employment skills and support in the region through the alignment of needs as identified by the Regional Skills Fora	How will the RSES support this process or the work of the Regional Skills Fora?
164. Support disadvantaged communities facing particular barriers to employment, including actively marketing vacancies that are relevant to them	Who would be responsible for this? It would be useful to name the stakeholders involved.
165. Through constituent LCDs promote vocational and occupational programmes and pathways for progression to careers	
166. Support the continuation of the STEM Programme	More detail on the STEM programme would be needed, and also if there is any region-specific approaches to promoting STEM e.g. a focus on Med Tech skills in the West.
167. Ensure that the requirements of emerging sectors are reflected in the regional skills needs and resourcing	This objective could be combined with RPO 163, as identification of emerging sectors would be key to the 'alignment of needs'.
168. Support and promote the growth, development and success of the Connacht Ulster Alliance to technical university status.	
169. Supports the provision of third level education in the Cavan/Monaghan sub-region.	No previous reference has been made to this in the preceding text. Does this refer to a specific proposal for provision of third level education in these counties? Or is it a more general comment? If it is more general, should there also be reference to Roscommon/Leitrim and third level outreach activities in those counties?

7.5 HEALTHY PLACES

p. 265 – The discussion all relates to how planning can promote healthier lifestyle choices, however a number of the Objectives relate to the location / provision of healthcare services. As access to healthcare services is not referred to at all in the preceding discussion, there is a need for the role of the RSES in improving access to healthcare for residents of the Region to be included.

Regional Policy Objective	Comment
170. To support the development of a new acute hospital facility within the Galway City Metropolitan Area.	This has not been mentioned previously in this section. Does this refer to the Galway City MASP p. 75 and 'undeveloped lands in the Merlin Park Campus'? If so, this objective should be more specific.
171. To support the implementation of the objectives of Sláinte Care, including the development of a Single Tier Health Service, and	Again, there has been no previous discussion of access to healthcare services (hospitals and primary care centres) and the role of the RSES in

the advancement of a number of Primary Care Centre's in our Urban Places.	this.
172. Promote the provision of high quality, accessible and suitably proportioned areas of public open space and promote linking of new open spaces with socio, cultural and heritage sites.	This should be moved down to appear with 174-176 as they relate to healthy lifestyles.
173. Support the Health Service Executive and other statutory and voluntary agencies and private healthcare providers in the provision of healthcare facilities to all sections of the community, at appropriate locations, with good public transport links, parking and accessible facilities.	This should be moved to be with 170 and 171, as it relates to healthcare services. How will the RSES support this?
174. Prioritise walking and cycling accessibility to both existing and proposed developments.	Agree this is an important objective. Would it be done for proposed developments through planning process conditions? What about existing developments? How would this be implemented?
175. Promote the development of places and buildings that are accessible.	
176. Support the objectives of public health policy including Healthy Ireland and the National Physical Activity Plan through integration with planning policy.	

7.6 AGE FRIENDLY

Regional Policy Objective	Comment
177. Ensure local planning, housing, transport/accessibility and leisure policies are developed with a focus on meeting the needs and opportunities of an ageing population and people with disabilities.	How would this be operationalised? At Local Authority planning level, through LCDCs?
178. Aim to make this region an Age Friendly one by working with constituent Planning Authorities and recognising the demographic challenges that face the region and ensure the provision of suitable facilities and services at appropriate locations.	Provision of transport, especially rural transport, would be critical to this and should be specifically referenced.

7.7 CHILDCARE, EDUCATION AND LIFE LONG LEARNING

p. 267 – The discussion on Education and Lifelong Learning should be removed from here and moved to Section 7.4 'Talent' as it repeats many of the same points, it also refers to the Connacht-Ulster Alliance and the Objective supporting that (168) appears in section 7.4.

p. 267 – The remaining text on Childcare should be combined with section 7.8 (social and community).

Regional Policy Objective	Comment
179. Encourage multi-agency approaches for delivering the health, social care, education and community services needed by growing, diverse	This is a general, overarching RPO that refers to much of this section. It should be moved to become the first Regional Policy Objective for

or isolated communities.	the Inclusive Growth chapter.
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No Regional Policy Objectives 180 or 181

7.8 SOCIAL AND COMMUNITY

p. 268 – The Childcare paragraphs from 7.7 should be combined with this.

7.9 HOUSING -SUPPLYING HOMES FOR GROWING COMMUNITIES

p. 270 – It is critical to acknowledge that the vast majority of housing in the region will remain in the existing settlement pattern. The current pattern has developed over many years and the bulk of the housing stock will continue to exist where it is currently located. New homes will only form a small part of the overall housing stock. How the RSES addresses the existing housing stock, not only new development, needs to be discussed.

Discussion of aligning the supply and location of homes and jobs should also include the opportunity of expanding remote working, either for people to work from home or a hub located close to their home. It should also link with Chapter 4 and highlight how job creation in smaller towns, villages and rural areas can equally bring homes and jobs closer together, and that such ‘alignment’ does not necessarily have to involve building more houses in large urban centres.

p. 270 – As the Northern & Western Region is the most rural of the three Regional Assembly areas, the ‘Ireland’s future homes’ priorities from the NPF could be seen as being least applicable for this region. Interpretation and adaption of these three priorities to the specific circumstances and settlement pattern of the N&W region is required.

Regional Policy Objective	Comment
182. Provide information, data and evidence to Local Authorities to support them prepare Housing Need Demand Assessment (HNDA); to support the preparation of housing strategies and all related housing policy outputs, e.g. city and county development plans, local area plans, Traveller accommodation plans, Local Economic and Community Plans etc.	Who does this refer to? Who is to provide this information? Is it the NWRA?
183. Ensure sufficient high quality homes are developed in the right locations to support economic activity and regeneration linked with NPO 36	As the majority of homes are built by the private sector, how will the RSES influence private market behaviour? Should there be a specific Objective relating to social and public housing? Would the RSES have a more direct impact on social housing provision? NPO 36 should be given here.
184. Utilising the Urban and Rural Regeneration funds promote public and private partnerships and mechanisms to provide land for housing development	What is the role of the Land Development Agency in this? Are the URDF and RRDF the correct vehicle to provide land? They refer to projects.
185. Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.	Is this to be done through planning guidelines, the planning process?
186. Increase population living within	

<p>settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, in-fill development schemes, area or site-based regeneration, service site provision and increased building heights appropriate to the settlement, together with infrastructure provision.</p>	
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8.0 Growth Ambition 5: Infrastructure- Enabling Our Region

p. 273 – While a focus on infrastructure corridors is welcome, and in certain circumstances should make planning new infrastructure easier, they will not work in all situations. In addition, areas distant from an ‘infrastructure corridor’ may become disadvantaged in regard to infrastructure provision.

p. 274 – Development of energy infrastructure is particularly important in allowing us to make use of natural resources for energy generation.

p. 276 – Agree grid development in the North West is essential. For example, in Donegal, by 2022, it is expected that the connected renewable generation will have exceeded the capacity of the existing transmission system.⁵

p. 277 – The map here is out of date (for example the Grid West Project shown on the map has been cancelled).

p. 278 – Table 1: should provide more detail on timelines and objectives of the project investments.

p. 279 – Gas networks. Discussion of natural gas networks in Chapter 4 should be in this section.

p. 282 – The availability of ample water is a key regional asset and likely to be more important in the future. Given the abundance of rainfall in the Region, water should not be a limiting factor for development. However, it is the shortage of water services (supply and wastewater treatment) which can be limiting factors. These should be addressed as priorities so that the region can make the most of water as a key asset.

In relation to the protection of water in rivers, lakes and groundwater, it is important to be ambitious and to aim for an improvement in the number of water surface bodies achieving ‘very good’ status. This is important in a region that aims to benefit from a clean green environment.

Regional Policy Objective	Comment
8.3 ELECTRICAL GRID NETWORK	
187. The Assembly support the development of a safe, secure and reliable electricity network, and the transition towards a low carbon economy centred on energy efficiency and the growth projects outlined and described in this strategy.	This is very important and we welcome the Assembly support for the development of the electricity network.
188. Support the reinforcement and strengthening of the electricity transmission network with particular reference to the regionally important projects contained within Table 1.	This is welcome.
189. The Assembly supports the necessary integration of the transmission network requirements to allow linkages with renewable energy proposals at all levels to the electricity transmission grid in a sustainable and timely manner.	This is very important and we welcome the Assembly support for the development of the electricity network.
190. That reinforcements and new electricity	This is welcome

⁵ <https://www.wdc.ie/wp-content/uploads/wdc-insights-electricity-december-2018.pdf>

transmission infrastructure are put in place and their provision is supported, to ensure the energy needs of future population and economic expansion within designated growth areas and across the Region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs. Ensure that development minimises impacts on designated areas.	
8.4 GAS NETWORKS	
191. To support the build out of the gas supply network into Counties Sligo, Roscommon, Donegal and Leitrim and in additional locations in the remainder of the region.	This could be stronger. Natural gas infrastructure is important for the development of the Region, for the competitiveness of businesses there and in future, as there is a move to renewable biogas and use of gas as a transport fuel (especially for freight), access to the gas network will be even more important.
8.5 WASTE INFRASTRUCTURE	
192. The Assembly supports the implementation of the CURWMP 2015 – 2021 in terms of infrastructure provision.	
193. The Assembly supports the requirement that the provision of waste infrastructure is integrated and co-ordinated with economic development and the planned development of the region as set out in this strategy and the NPF.	
194. The siting of waste infrastructure shall in urban areas generally be on lands zoned for industrial use and in non-urban areas shall accord with the principles of proper planning and sustainable development. Environmental constraint mapping can be use to aid this process.	
195. The Assembly supports the move towards regional and national self-sufficiency in terms of waste management infrastructure in accordance with the proximity principle and with the circular green economy.	There also needs to be a focus on the reduction in items used and packaging so that they do not even enter the circular economy.
8.5 WATER SERVICES INFRASTRUCTURE	
196. To ensure that adequate infrastructure is in place to meet demands from continuing growth and development of the economy and to cater for existing and increased population levels.	This is welcome.
197. Support the delivery of flood defence works planned by OPW to be implemented in the short-term.	This is welcome.
198. To support the Rural Water Programme, which should be continued and enhanced.	This is welcome.
199. Support investment for water and wastewater services in the first instance where existing facilities are insufficient to meet current demands and as outlined in (ii) above.	This is welcome.

200. Water conservation measures should be expanded particularly by rehabilitation and reinforcement of existing water networks.	This is welcome.
201. Provide quality water and waste water services necessary for urban and rural economic development purposes.	This is welcome.
202. Ensure the protection and improvement of all waters – rivers, lakes, groundwater, estuaries (transitional waters), coastal waters and their associated habitats and species throughout the Region and implement measures to achieve at least Good Status in all water surface bodies.	The aim should also be to improve the proportion of water bodies achieving ‘very good’ status.
203. Implement the EC Environmental Objectives (Groundwater) Regulations, 2010 (S.I.No.9); the EC (Good Agricultural practice for Protection of Waters) Regulations, 2009 (S.I. No.101), the Bathing Water Quality Regulations, 2008 (S.I.79) and EC (Quality of Shellfish Waters) Regulations 2006 and amendment Regulations.	This is welcome.
204. Participate in the implementation and promote compliance with the objectives of the ‘Water Framework Directive’ through the River Basin Management Plans throughout the region.	The Water Framework Directive and the River Basin Management Plans are important to the maintenance of the quality of water bodies in the Region. The role of the NWRA should be made more explicit.
205. Support investigation for the elimination of combined sewers from our drainage networks and to implement same in the interests of sustainable development.	This is welcome.
206. Prioritising investment to improve storm water infrastructure to improve sustainable drainage and reduce the risk of flooding in the urban environment.	This is welcome.
207. The Regional Authority will support the achievement of the objectives under the River BMP for the relevant waterbodies in the region.	This is welcome.

9.0 All Island Cohesion

p. 287 – It would be useful to include more reference (or a map) of the spatial area of the North West Metropolitan Area (as outlined in the Letterkenny Regional Centre Spatial Plan).

p. 287 – Given the fundamental impact that Brexit (in whatever form it takes) will have on the Northern & Western Region and All-island cohesion, more discussion of Brexit and potential impacts on all-island cohesion and border counties is needed.

p. 289 – Energy – The statement ‘... to encourage, support and enable its [gas network] extension to new areas within the cross-border region.’ Does this refer to supporting cross-border connections to link the gas network of the Republic of Ireland and Northern Ireland. For example to extend the gas network in Derry/Strabane across the border to give access to natural gas to Letterkenny? How does this link to Regional Policy Objective 191 (Chp 8) on extending the gas network, including to border counties?

p. 294 – This case study is not very clear and there is reference to the ‘All Ireland Energy Supply Market’ which does not seem to fit in this section on basin management.

Regional Policy Objective	Comment
208. To reinforce through the RSES the NW Regional Growth Partnership, through the continuation of growth in Letterkenny Regional Growth Centre and its wider hinterland, which includes the NWCR, and align where possible spatial planning, including Bridgend, Muff and Killea, Co. Donegal.	Make a specific reference to Chapter 3 and the strategic plan for Letterkenny.
209. To establish a Cross Jurisdictional Working Group which collaborates on projects such as Blueways, Greenways, Walking / Hiking Trails / Peatways to foster improved Local and Regional links.	Who will establish this group? Who would be the stakeholders?
210. The Assembly will work with Local Authorities, and other stakeholders in both jurisdictions to identify further potential projects which could benefit cross border communities, and in doing so create an inventory of priority projects to be advanced to feasibility studies, and beyond.	Strong, specific objective. Who would be the target audience for this inventory? Would it be for both Governments, Local Authorities, Sectoral agencies, communities?
211. To ensure the continuation and strengthening of cross jurisdictional management of River Basin Management Plans, as well as Water Framework Directive cooperation.	Perhaps reference to Brexit should be included. As the ‘Water Framework Directive’ is an EU policy, the future of all-island cooperation in this area is likely to be impacted by Britain’s exit from the EU.

10.0 Implementation

10.1 Introduction

p. 297 – The RSES acknowledges that ‘Implementation requires alignment and coordination between Central and local government, private sector’ etc.

p. 298 – ‘RSES best delivered through cohesive and coherent partnerships...’

p. 298 – ‘... through partnership and collaboration ...’

While partnership and collaboration are very important there also needs to be a mechanism to ensure action is taken to support the RSES objectives. The draft RSES contains very little information on how alignment can be achieved especially when there are different sectoral and national and regional priorities and therefore different and possibly divergent policies and investment strategies.

As the RSES is a broad strategy, with long term goals across a range of policy areas, a wide range of organisations, as well as the NWRA, must be involved in its implementation. These include National Government – political level, Department of Finance/ DPER, NPF lead Department (D. Taoiseach/ DHPLG), Other Government Departments, Other Regional Assemblies, Local Authorities, IDA, Enterprise Ireland, LEOs, Údarás na Gaeltachta, Fáilte Ireland, HSE (Tertiary and Community Care decision making), Education (2nd level, higher (IoTs and Universities), further education and training (ETBs)), Transport providers (national and regional, public and private) and private sector commercial interests.

While the RSES is a regional strategy, its success will very much depend on decisions made at central Government level, on national sectoral policy and the decisions of State Agencies and bodies with a national remit, as well as those of private sector investors. Much of the control over its implementation will be at a national level and alignment with Sectoral Policy and Agencies will be critical.

10.2 Organisation

p. 299 – Delivery will require more than ‘leading key priorities’ and ‘supporting and facilitating collaborative activities’. As discussed earlier, much of national and sectoral policy determines regional policy.

If the goals and priorities of sectoral agencies are not aligned with RSES then implementation will be difficult if not impossible. But achieving this alignment, and at the same time achieving strategic spatial goals, will be complex. Such organisations have other responsibilities and are dealing with other issues in terms of their service and investment plans. They may find that what is appropriate for their function is not in line with the RSES. If the RSES is to succeed there needs to be a mechanism for resolving or considering such conflicts to ensure that they are not ignored, but so that appropriate decisions are made by the responsible organisations.

10.3 Delivery

Regional

The Draft NWRA RSES notes that ‘The Assembly will take ownership for oversight in the implementation of the Strategy’. This is welcome but will require resourcing and mechanisms for ensuring alignment and resolving conflict.

It seems that alignment with Local Authority plans will be achieved through the issuing of formal recommendations by the Regional Assembly to the Local Authority. It is not clear yet how this will work in practice.

Successful implementation requires that investment and policy decisions across State and semi-State organisations are in line with the RSES, rather than operating in opposition to it. As noted under Section 10.1, there are a whole range of national and regional bodies whose organisational policies and plans determine much of what occurs at a regional level. While it is important to consider how implementation will work, it is also important to recognise that much of sectoral planning and policy has, and will continue, to determine regional resource allocation and development. How the alignment of all these policies and plans will be realised is not clear.

Sub-Regional

The intention is that the RSES can help with ‘Formulating and supporting the alignment of sub-regional economic priorities and investments.’ It is not clear the mechanisms for this and how the the Regional Assembly can or will reconcile national, regional and local objectives. The RSES’s relationship with all these elements needs to be made clear.

10.4 Monitoring

The WDC welcomes the intention that the monitoring framework should encourage continual improvement of policy interventions as well as monitoring progress.

Measuring the successful implementation of the RSES will need focus on measuring outcomes at a regional and sub-regional level and indicators need to be devised and used to benchmark and monitor progress. Where available indicators measuring rural and urban difference should also be used.

Progress toward achieving the RSES, recognising its multi-dimensional nature, should be monitored. Many of the indicators contained in the ‘Socio Economic Baseline Report’ are drawn from Census 2016 and will not be available annually. It would be useful to know which specific indicators will be used for the annual report.

10.5 Funding Follows Policy

The primary source of funding for achieving regional development will be the National Exchequer. The only way that the RSES can be successfully implemented is for Departmental and State and Semi-State Agency expenditure decisions and allocations, including the NDP, to be fully aligned with the spatial priorities outlined in the RSES. In the absence of alignment of Exchequer funding with the NPF and RSES, they cannot succeed.

Sufficient funding must be available for investment in needed infrastructure and facilities to ensure that the areas designated by the RSES can grow. Investments need to be planned over the long term and there has to be certainty that in the medium and longer term the required investments will be made. There will be concerns about both the short and long term availability of funding to ensure implementation and this uncertainty could also affect implementation. The cancellation of the planned Gateway Innovation Fund contained in the NDP 2007-2013 is a case in point.

While the NPF and RSES both posit the idea of regions making the most of their assets and opportunities and ‘bottom-up’ development, the very low levels of funding available at local and regional government level in Ireland to invest and drive regional development goals, which have

been locally developed, is a substantial barrier to achieving this. Reforming administration and governance structures to provide more autonomy and self-financing at regional and local government level, and support to enhance governance and leadership, is required to effectively implement the RSES.

Public investments of a 'national' nature which are mainly located in the Capital contribute strongly to its economic growth and primacy. Public investment can either reinforce the 'business as usual' scenario or be used as a tool to achieve the priorities of the RSES for more effective regional development.

p. 301 – EU Priorities post 2020.

While the discussion on the future focus on five EU policy objectives provides some context for future EU policy and funding, beyond signalling approach, it provides little information on Implementation.

Ends