



Northern & Western
Regional Assembly

Submission on DHLGH Statement of Strategy 2023-2025

April 2023



Rialtas
na hÉireann
Government
of Ireland

Tionscadal Éireann
Project Ireland
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The Northern and Western Regional Assembly welcomes the opportunity to provide input into the development of the new statement of strategy for the Department of Housing, Local Government and Heritage (DHLGH) for the period of 2023 to 2025.

The National Planning Framework¹ (NPF) and the Regional Spatial and Economic Strategy (RSES) of the Northern and Western Region² offer an ambitious proposition to address regional inequalities and deliver more effective regional development in Ireland. By 2040, both the NPF and the RSES have committed to delivering a roughly 50:50 distribution of population and employment growth between the Eastern and Midland Region, and the combined area of the Southern Region and Northern and Western Region. Achieving this distribution will radically realign the composition of Ireland's population, employment and housing stock, addressing regional imbalance and ensuring the Northern and Western Region can address its historical weak urban structure and provide a credible counterbalance to the Greater Dublin Area.

As noted in the NPF and in the RSES of the Northern and Western Region, a 'business as usual' approach whereby there is a continued focus on growth in and around Dublin and to some extent Cork, Limerick, Galway and Waterford without addressing the specific development challenges of all regions – such as the weak urban structure of the Northern and Western Region – would have considerable negative consequences for the rest of Ireland. Such a scenario would further add to the growth pressures being experienced in the Greater Dublin Area and would restrict the ability of rural regions in realising their full potential. For this reason, the NPF identified Letterkenny, Sligo and Athlone as performing city-like functions, albeit at a smaller scale and designated them as Regional Centres for significant growth. It also identified Letterkenny within the context of the cross-border North-West city region and Drogheda/Dundalk within the context of the Belfast/Dublin economic corridor – reflecting an all-island collaborative development approach. The RSES of the Northern and Western Region has developed this further through a number of "Regional Policy Objectives" (RPO) which would enhance the urban structure of the region, including but not limited to:

- RPO 3.2 (a), namely deliver at least 50% of all new city homes targeted in the Galway MASP, within the existing built-up footprint of Galway City and suburbs.
- RPO 3.2 (b), namely deliver at least 40% of all new housing targeted in the Regional Growth Centres (Sligo, Letterkenny and Athlone), within the existing built-up footprint.
- RPO 3.2 (c), namely deliver at least 30% of all new homes that are targeted in settlements with a population of at least 1,500 (other than the Galway MASP and the Regional Growth Centres), within the existing built-up footprints
- RPO 3.3, namely deliver at least 20% of all new housing in rural areas on brownfield sites
- RPO 3.4, namely support the regeneration and renewal of small towns and villages in rural areas

Implementing the vision and objectives of the NPF and the RSES – and by virtue addressing the weak urban structure of regions outside of the Greater Dublin Area and delivering better balanced and effective regional development in Ireland - have now been embedded within the revised County and City Development Plans enabling its implementation at project level. This will depend on several factors, including – but not limited to – the provision of affordable, compact and high-quality housing of scale in the cities and regional centres across the most rural region under Project Ireland 2040, namely the Northern and Western Region.

¹ <https://npf.ie/wp-content/uploads/Project-Ireland-2040-NPF.pdf>

² <https://www.nwra.ie/pdfs/NWRA-RSES-2020-2032.pdf>

Within this context, the Northern and Western Regional Assembly welcomes the opportunity to provide input into the development of the new statement of strategy for the DHLGH for the period of 2023 to 2025. The Northern and Western Regional Assembly has made a number of high-level recommendations which should be reflected in the new statement of strategy, namely:

1. The NPF should maintain its commitment to delivering “National Policy Objective 1a”, ensuring the projected level of population and employment growth in the Eastern and Midland Region is matched by that of the combined area of the Northern and Western Region and the Southern Region
2. Deliver housing and enabling infrastructure at key locations that will contribute to compact growth targets identified in the Galway Metropolitan Area.
3. Deliver housing and enabling infrastructure on key sites that will contribute to compact growth targets identified in the Regional Growth Centres – namely Letterkenny, Sligo Town and Athlone – and the Key Towns of the Northern and Western Region.
4. Ensure funding resources from initiatives such as – but not limited to – the Croí Cónaithe Funds and the Urban Regeneration Development Fund explicitly support the implementation of the population and compact growth targets outlined in the NPF and the RSES of the Northern and Western Region.
5. Reduce the level of vacant and derelict dwellings within the cities, towns and villages of the Northern and Western Region.
6. Develop serviced sites within close proximity to the centre of rural towns and villages across the Northern and Western Region to enable the development of more sustainable and compact rural housing developments in the region.
7. Improve the wastewater treatment capacity of the Northern and Western Region’s towns and villages that are operating above capacity or have no wastewater treatment plant, while providing adequate capacity to accommodate future population and employment growth in line with the RSES of the Northern and Western Region.



2:

Basis for Recommendations

2.1

New Dwelling Completion levels

- New dwelling completions amounted to just over 3,500 in the Northern and Western Region in 2022.
- Completions were up 134 per cent compared to the base year of the NPF and the RSES.
- The Eastern and Midland Region accounted for 63 per cent of completions in 2022.

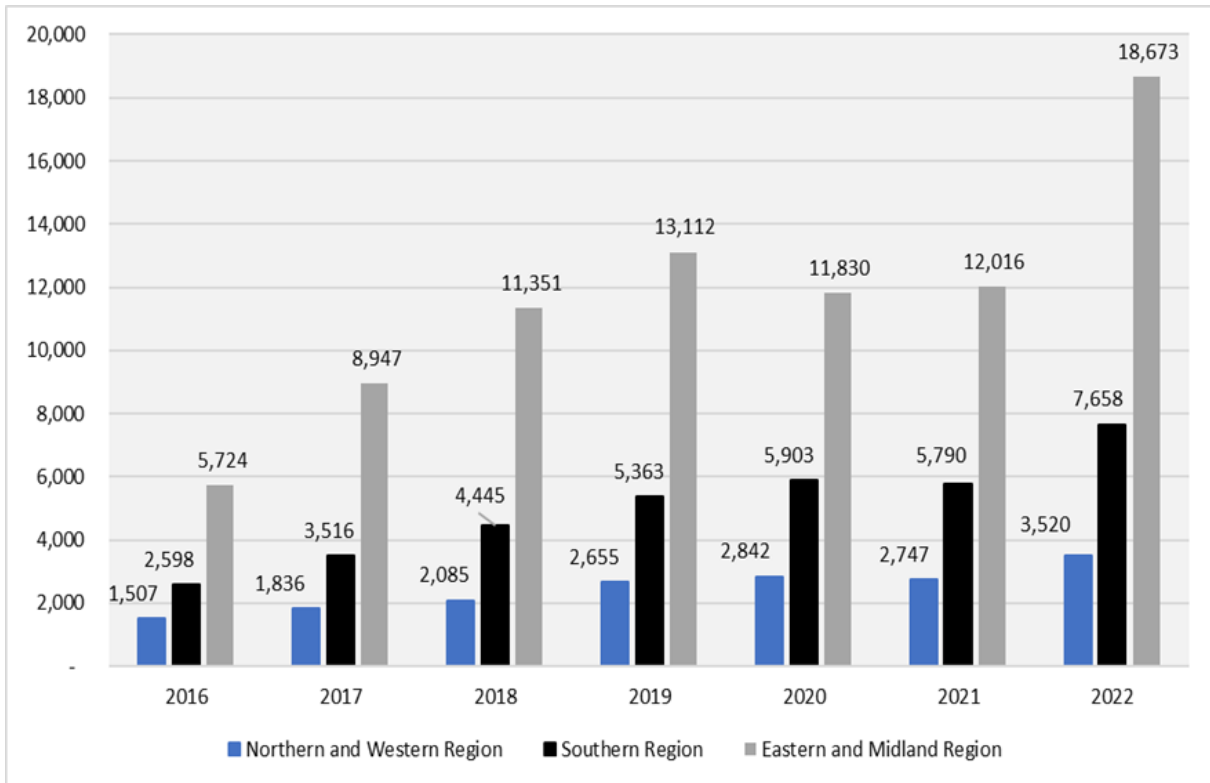
As evident from Figure 1, the total number of new dwellings that were completed in the Northern and Western Region amounted to 3,520 in 2022, representing a significant increase of 134 per cent compared to 2016 – which was the base year of the NPF and the RSES of the Northern and Western Region – with considerably high growth rates also recorded in the Southern Region (+195%) and the Eastern and Midland Region (+226%).

Notably, the proportion of new dwelling completions that were located in the Eastern and Midland Region has progressively risen over time, with 63 per cent of completions located in the region in 2022, which was 5 percentage points higher than the corresponding ratio in 2016. It is noted that the trends are not yet reflecting the long term ambition of “National Policy Objective (NPO) 1a”³ of the NPF. It is likely that the existing trend of growth towards the Eastern and Midland Region is a manifestation of legacy policy and is reflective of the time lag in transitioning policy instruments and investments at national, regional and local level to reflect the policy shift of the NPF through individual local projects. When the NPF was adopted, it was acknowledged that this would take a number of years to embed.

Given that these policy instruments are now in place, the impact of these changes will need time for significant progress to be made and the statement of strategy needs to be consistent with the NPF and steer away from further policy adjustments to these objectives as the outcome will bring uncertainty which will likely affect some construction firm’s willingness to invest in housing developments, leading to further delay in the delivery of housing in regions such as the Northern and Western Region.

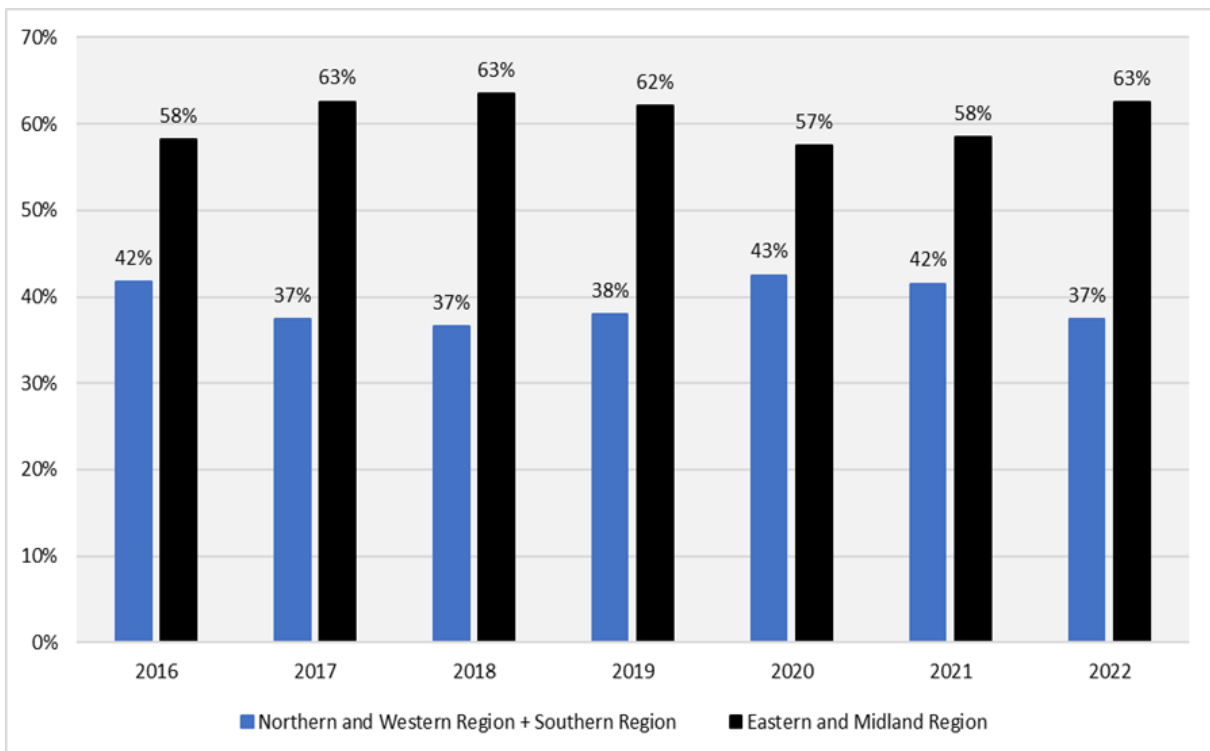
³ NPO 1a commits to ensuring that the projected level of population and employment growth in the Eastern and Midland Regional Assembly area is matched by that of the Northern and Western Regional Assembly and Southern Regional Assembly areas combined.

Figure 1: New dwelling completions by the NUTS 2 Regions of Ireland, 2016 to 2022



Source: CSO⁴

Figure 2: Spatial distribution of new dwelling completions in Ireland, for the Northern and Western Region and Southern Region versus the Eastern and Midland Region, 2016 to 2022



Source: CSO

⁴ <https://www.cso.ie/en/statistics/buildingandconstruction/newdwellingcompletions/>

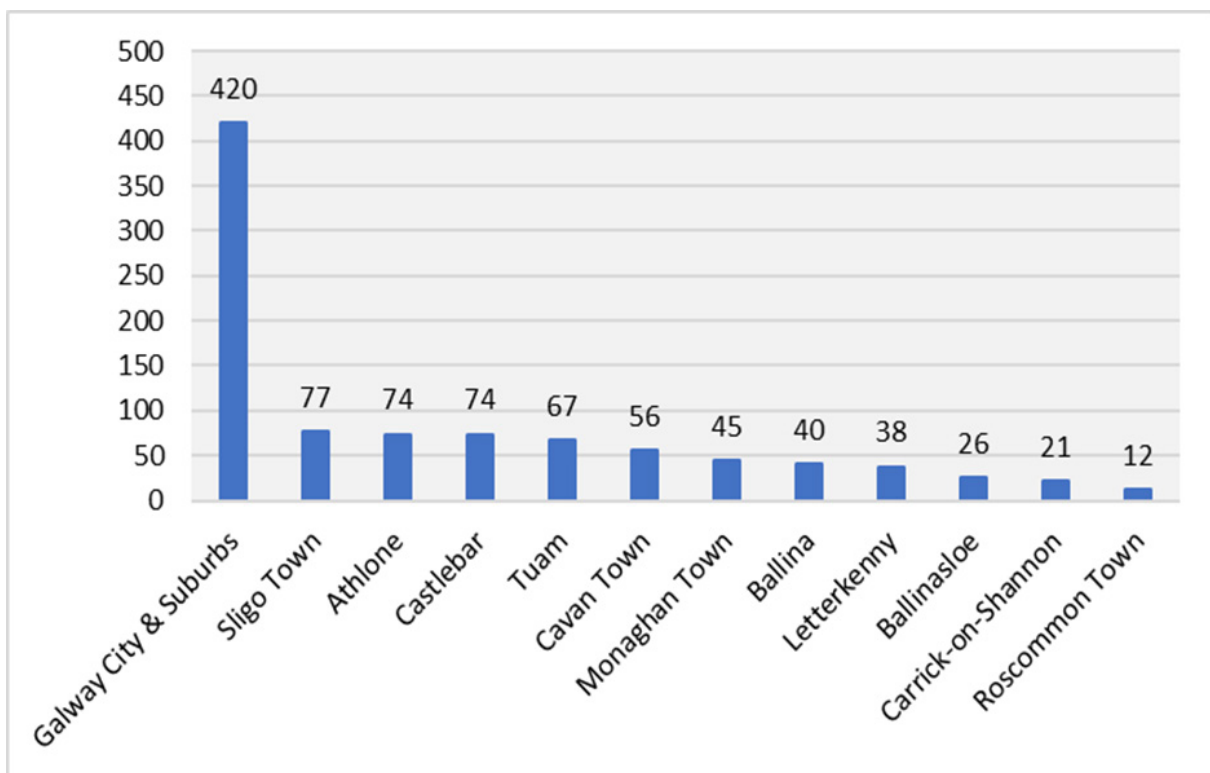
Furthermore, the level of new dwelling completions in the key urban centres of the Northern and Western Region continues to remain notably low, with a lack of activity undermining the implementation of key population targets outlined in the RSES of the Northern and Western Region.

For example, between 2016 and 2022, the number of new dwelling completions in Galway City and Suburbs amounted to 1,602. Although the delivery of these new dwellings is to be welcomed, they are notably behind the level of housing activity that would be required in order to progressively deliver the population targets which have been outlined in the RSES through the Galway Metropolitan Area Strategic Plan (MASP).

Relative to a base year of 2016, the Galway MASP aims to increase the population of Galway City and Suburbs by further 23,000 to 2026 and by a further 12,000 to 2031,⁵ but at the current rate of housing completions in Galway City it will be quite difficult to meet these targets. Others key settlements in the region that also registered notably low levels of new dwelling completions during this time period included Letterkenny (373 new dwelling completions between 2016 and 2022), Athlone (269) and Sligo Town (243).

Considering these relatively low levels of activity and mindful of the level of new dwelling completions taking place in the Eastern and Midland Region, it is clear that more targeted housing interventions at a regional level are required and such an emphasis should be reflected in the new statement of strategy of the DHLGH.

Figure 3: New dwelling completions in the key settlements of the Northern and Western Region in 2022



Source: CSO

⁵ <https://www.nwra.ie/pdfs/NWRA-RSES-2020-2032.pdf>

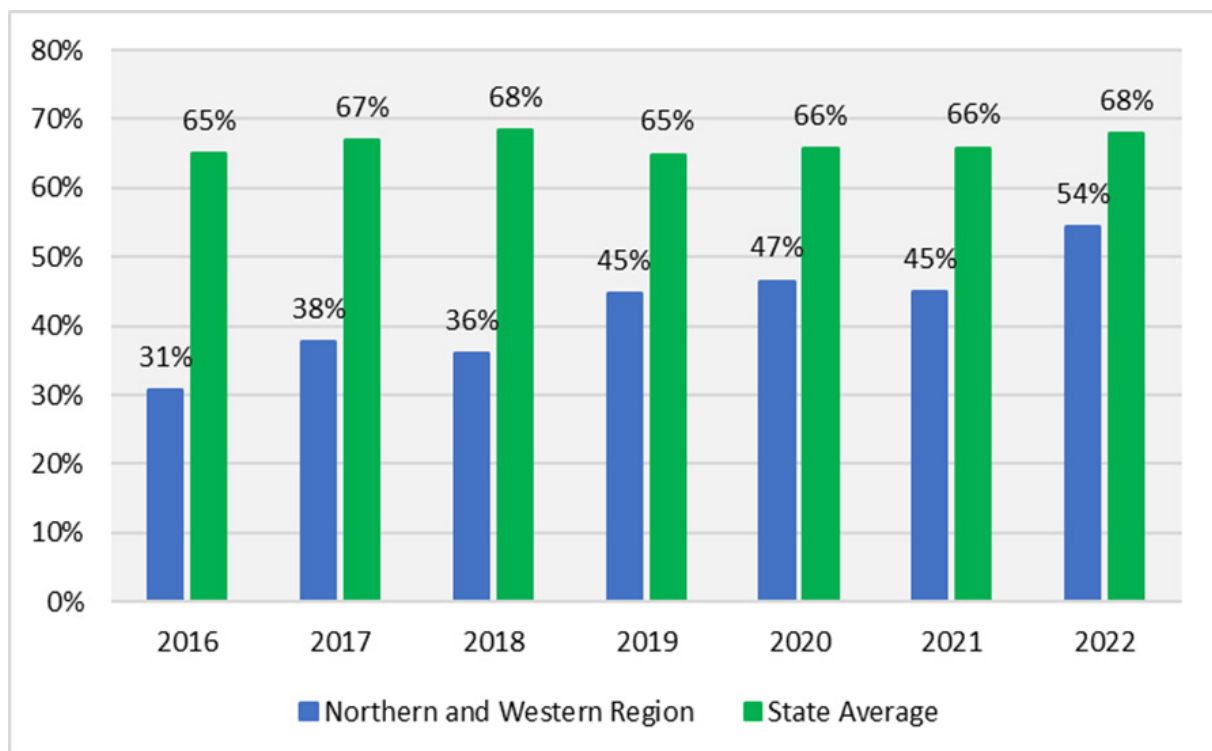
2.2 Regional Compact Growth

- Compact growth key to addressing the Northern and Western Region’s weak urban structure.
- Greater levels of compact growth continue to be delivered in the Northern and Western Region.
- 54 per cent of all new dwelling completions in the Northern and Western Region were within the region’s existing settlement boundaries.

The degree to which policymakers can support the delivery of compact growth with respect to new dwelling completions will be central to supporting more sustainable settlement patterns and addressing the weak urban structure of the Northern and Western Region, with urban centres of scale key to addressing regional imbalance in Ireland.

The delivery of greater compact growth is committed to under the NPF, with “National Policy Objective 3a” aiming to deliver at least 40 per cent of all new homes nationally within the built-up footprint of existing settlements, namely CSO defined settlements. As of 2022, 68 per cent of new dwelling completions in Ireland were delivered within the built-up footprint of existing settlements, representing a 3 percentage point increase on the same ratio in 2016. Notably, 54 per cent of new dwelling completions in the Northern and Western Region were delivered within the built-up footprint of existing settlements in the region,⁶ which was above the national target outlined in “NPO 3a” and was significantly higher than the corresponding ratio of 31 per cent in 2016. The provision of policy initiatives to build on these trends needs to be reflected in the new statement of strategy.

Figure 4: New dwelling completions in CSO defined settlements, as a percentage of total new dwelling completions, 2016-2022



Source: CSO

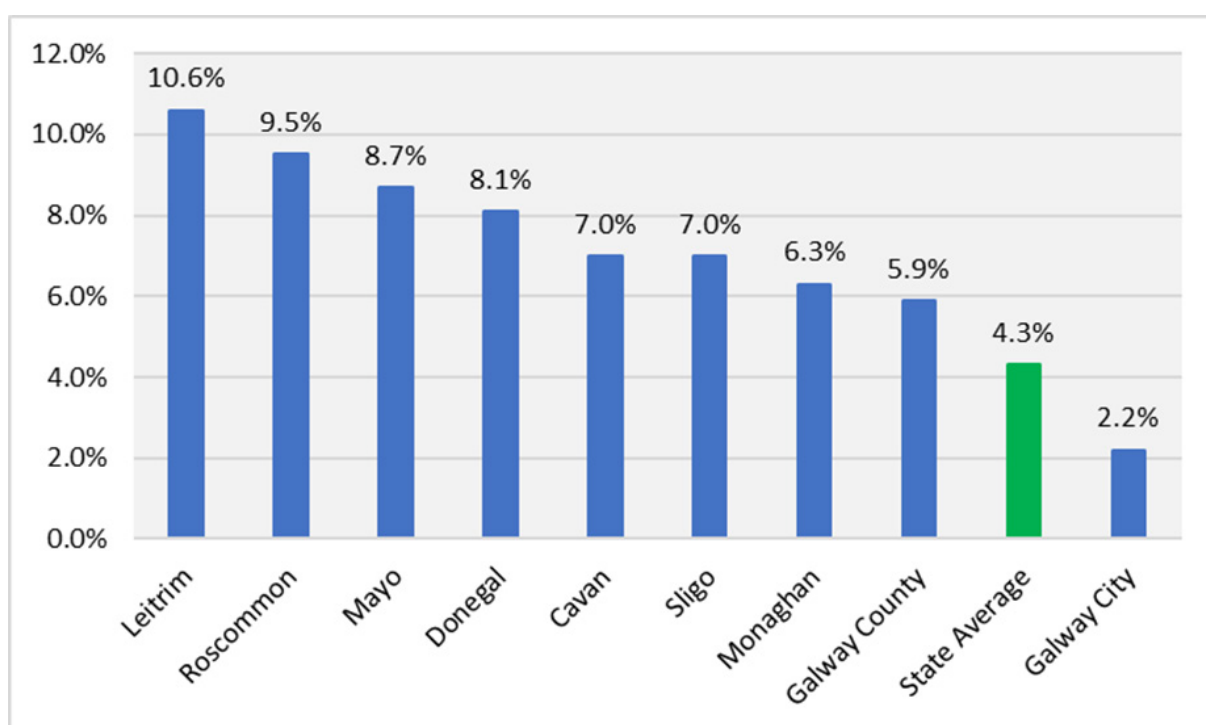
⁶ Includes CSO defined settlements of Lanesborough-Ballyleague, Counties Roscommon & Longford and Athlone, Counties Westmeath & Roscommon

2.3 Residential Vacancy

- Local Authorities in the Northern and Western Region recorded the highest vacancy rates in Ireland as of Q4-2021.
- The Local Authority with the highest vacancy rate was Leitrim, followed by Roscommon and Mayo.
- Galway City was the only Local Authority in the Northern and Western Region to record a below average vacancy rate in Q4-2021.

According to the CSO's vacant dwelling indicators publication – which was based on metered electricity consumption⁷ – the dwelling vacancy rate in Ireland was 4.3 per cent in Q4-2021, with the highest vacancy rates generally recorded in Local Authorities based in the Northern and Western Region. As of Q4-2021, Leitrim was the Local Authority with the highest vacancy rate at 10.6 per cent in Q4 2021, followed by Roscommon (9.5%), Mayo (8.7%), Donegal (8.1%) and Kerry (7.4%). As evident from Figure 5, 8 out of the 9 Local Authorities located in the Northern and Western Region registered above average dwelling vacancy rates, highlighting the need for a regional approach in addressing vacancy and improving housing supply.

Figure 5: Dwelling vacancy rate, by the Local Authorities of the Northern and Western Region vs the State average, Q4-2021

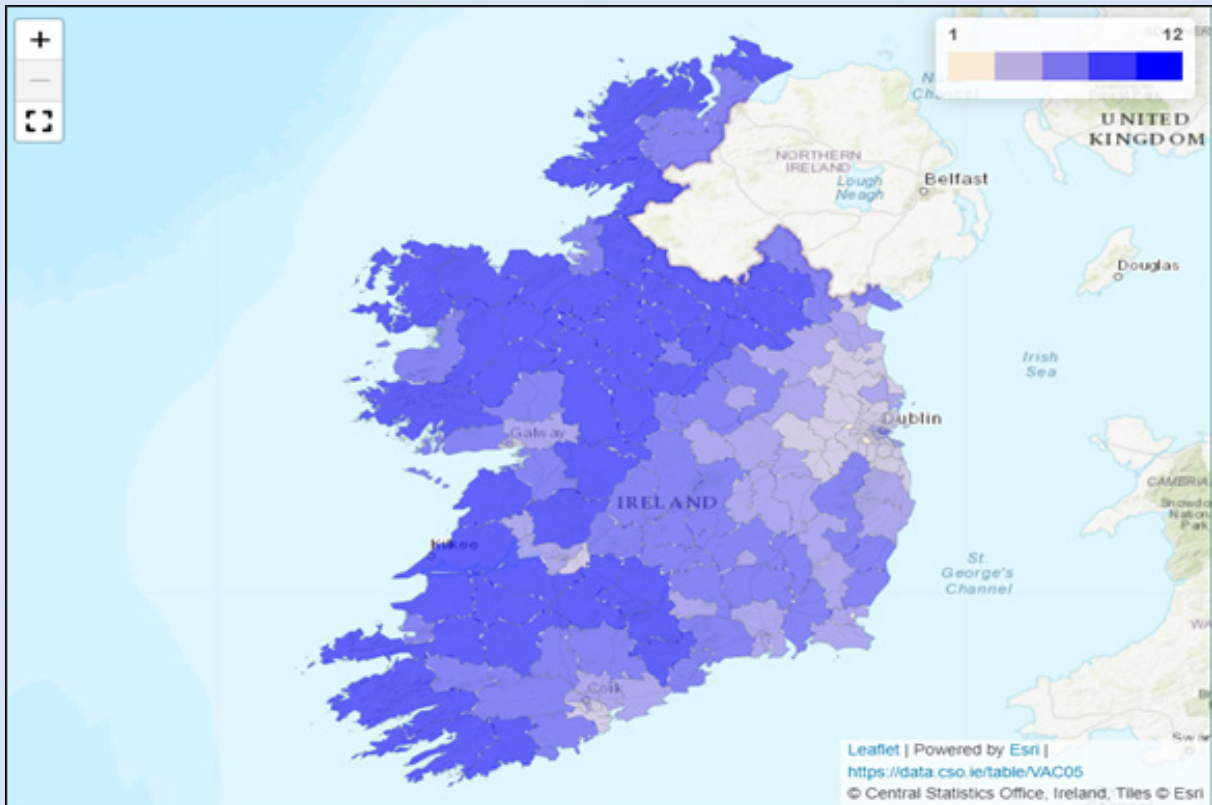


Source: CSO

Similar trends were identified when this information was examined by Local Election Area, with above average dwelling vacancy rates generally concentrated in areas located in the Northern and Western Region, as evident from Figure 6. Vacancy rates for dwellings were highest in Swinford, Co. Mayo (12.2%), Ballinamore Co. Leitrim (11.9%), and Glenties Co. Donegal (11.5%). Dwelling vacancy rates were lower in Dublin and surrounding areas and in the other cities. The lowest rates were 0.7 per cent in Leixlip, Kildare and in Tallaght Central, Dublin, and 0.9 per cent in both Celbridge, Kildare and Ongar, Dublin.

⁷ <https://www.cso.ie/en/releasesandpublications/fp/fp-viec/vacantdwellingindicatorsbasedonmeteredelectricityconsumption2021/>

Figure 6: Vacancy rate for dwellings, by Local Election Area, Q4-2021.



Source: CSO



It is imperative that the new statement of strategy of the DHLGH supports the implementation of the housing objectives of the RSES of the Northern and Western Region, with the view of supporting the delivery of more affordable, compact and high-quality housing in the region. With this in mind, the Northern and Western Regional Assembly has outlined a series of recommendations which should be reflected in the new statement of strategy of the DHLGH.

1. **The NPF should maintain its commitment to delivering “National Policy Objective 1a”, ensuring the projected level of population and employment growth in the Eastern and Midland Region is matched by that of the combined area of the Northern and Western Region and the Southern Region:** It is imperative that any update of the NPF should retain the existing commitment to addressing regional imbalance and supporting the delivery of a roughly 50:50 distribution of growth between the Eastern and Midland Region, and the combined area of the Southern Region and Northern and Western Region. In this regard, the new statement of strategy should aim to deliver more balanced growth between the three NUTS 2 Regions of Ireland, with the existing NPF noting that Dublin – and to a lesser extent the wider Eastern and Midland Region – has witnessed an historical overconcentration of population, homes and jobs.
2. **Deliver housing and enabling infrastructure at key locations that will contribute to compact growth targets identified in the Galway Metropolitan Area:** As required by the RSES, at least 50% of all new homes that are targeted in the Galway Metropolitan Area are to be delivered within their existing built-up footprints, in accordance with NPF “National Policy Objective 3b”. The new statement of strategy of the DHLGH needs to support the delivery of housing developments and enabling infrastructure on key locations that have the potential for high-density development and regeneration of brownfield and infill sites in the Galway Metropolitan Area as provided within the RSES Metropolitan Area Strategic Plan.
3. **Deliver housing and enabling infrastructure on key sites that will contribute to compact growth targets identified in the Regional Growth Centres – namely Letterkenny, Sligo Town and Athlone – and the Key Towns⁸ of the Northern and Western Region:** As required by the RSES, at least 40 per cent of all new homes that are targeted in the Regional Growth Centres of the Northern and Western Region – namely Sligo Town, Letterkenny and Athlone – are to be delivered within their existing built-up footprints, with an equivalent target of 30 per cent required for the designated Key Towns of the Region. The provision of capital expenditure for housing developments and enabling infrastructure on key sites within the Regional Growth Centres and Key Towns of the Northern and Western Region should support the regeneration of underused town centres and brownfield/infill lands while also supporting the development of housing on existing zoned and serviced lands to facilitate significant compact growth in these areas.
4. **Ensure funding resources from initiatives such as – but not limited to – the Croí Cónaithe Funds and the Urban Regeneration Development Fund (URDF) explicitly support the implementation of the population and compact growth targets outlined in the NPF and the RSES of the Northern and Western Region:** The new statement of strategy from the DHLGH should aim to ensure that an above average level of resources from the Croí Cónaithe Funds and the URDF are deployed in the Northern and Western Region, with the view of delivering the compact growth targets of the RSES and addressing the weak urban structure of the region. In doing so, the DHLGH can support the regeneration of brownfield sites and vacant properties across the Galway Metropolitan Area, the Regional Growth Centres of Sligo Town, Letterkenny and Athlone and the 8 Key Towns of the Northern and Western Region, thereby improving the level of regional housing supply, ensuring our residents live closer to essential services and workplaces and developing urban centres of scale in the region.

⁸ The Key Towns of the Northern and Western Region include Ballina, Castlebar, Cavan, Ballinasloe, Carrick-on-Shannon, Monaghan Town, Roscommon Town, and Tuam

5. **Reduce the level of vacant and derelict dwellings within the cities, towns and villages of the Northern and Western Region.** As evident from Section 2 of this submission – and based on research carried out by the Northern and Western Regional Assembly on vacant and derelict properties using GeoDirectory data⁹ – it is clear that an above average concentration of vacant and derelict properties exists in the Northern and Western Region. Therefore, the new statement of strategy needs to ensure that funding resources that can be used to support the regeneration of vacant and derelict properties should “Positively Discriminate” towards the towns and villages of the Northern and Western Region, given the high number of vacant and derelict properties located in the region.
6. **Develop serviced sites within close proximity to the centre of rural towns and villages across the Northern and Western Region to enable the development of more sustainable and compact rural housing developments in the region.** The new statement of strategy of the DHLGH should aim to assist Local Authorities in encouraging families and individuals to build their own homes on serviced sites within walking distance of the centre of rural towns and villages based in the region. Such initiatives should provide a sustainable alternative to one-off rural housing and deliver a mechanism to develop rural populations and revitalise towns and villages, in line with the spatial objectives of the NPF and the RSES of the Northern and Western Region.
7. **Improve the wastewater treatment capacity of the Northern and Western Region’s towns and villages that are operating above capacity or have no wastewater treatment plant, while providing adequate capacity to accommodate future population and employment growth in line with the RSES of the Northern and Western Region:** The provision of adequate wastewater treatment capacity is a key component to supporting future population and employment growth in towns and villages across the Northern and Western Region, while ensuring the resultant growth doesn’t affect our region’s natural assets and environment.


<https://www.nwra.ie/wp-content/uploads/2022/01/regional-vacancy-and-dereliction-analysis-17012022.pdf>



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