



Submission on the National Planning Framework
Ireland 2040

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Introduction

Letterkenny Chamber welcomes the publication of the Issues & Choices Paper for Ireland 2040 Our Plan. As a business representation organisation in the North West of Ireland located on the very edge of Europe we have ambitious plans for the future and we hope the NPF will help us in our own ambitions.

The challenges we have today in terms of population growth, connectivity and infrastructure, will only increase as the population of the North West region increases over the next 20 years.

Letterkenny Chamber continues to challenge our local authority planners to look ahead, to make predictions and to ensure that our services and developments are fit for the changing demographics.

As outlined in the document a “business as usual” approach will not deliver for our population and business community. We are pleased to see you have taken a long term place based approach and have the vision to help us see what sort of place Ireland should be in 2040.

Donegal County Council and its partners in Derry City and Strabane District Council have taken a proactive approach to the development of the cross border region. They have, along with key stakeholders, developed a vision that is supported at Ministerial and Departmental level that, if fully supported and resourced, will bring prosperity to the region as a whole. We were pleased to see recognition of the North West Strategic Growth Partnership in this document. We are all working together towards the goal of realising the economic potential of the region.

Our organisation and our members are fully behind this approach to the economic future of the region. The Strategic Growth Partnership formed with The 4th Largest city on the Island of Ireland could give this North West City Region the status of the 3rd largest city region on the island. We believe the approach in your plan for effective regional development could finally deliver economic benefit to the region and result in it becoming a net contributor to the whole country.

The result of the UK EU referendum was a disappointment to our members and many other businesses across Donegal and the wider North West, however the existence of the NW Strategic Growth Partnership and the strong relationships between the council areas can only help in alleviating some of the challenges that Brexit will bring to the region and will also serve as a mechanism that will be able to embrace any opportunities that may present themselves.

In this submission, while we have touched on the majority of the issues we have concentrated on the challenges and opportunities for the North West Region and the opportunity we now have to drive regional economic development in supporting the Island of Ireland as a whole.

What sort of place do we want Ireland to be?

Letterkenny Chamber would like Ireland, in the year 2040, to be a place where businesses and people can thrive and where vibrant cities can be reflected in vibrant regions as great places to live and do business. This can only be achieved through effective planning which recognises where growth can and will occur, while also encouraging differentiations. Ireland should be open for business and be as

competitive as possible a place in which to do business in the global economy over the coming decades and the NPF must strive to achieve this.

Ireland in 2040 should be a country with a flourishing economy and society that offers opportunity for all, achieved through well-designed policies which enable sustainable growth.

Ireland's National Planning Challenges

Ireland's recovery from recession over the last decade has been characterised by unevenly distributed economic activity across the country and as we continue to grow we face the legacy issues of underinvestment in infrastructure and a capital city that is currently under enormous pressure as it drives growth in increasingly more areas surrounding it.

With projected increases in population, likely to be located in mostly city regions, issues such as urban sprawl and the continued migration of people from rural Ireland will face Ireland over the coming decades.

These trends mean that Ireland's city regions must be supported to thrive in the face of the pressures facing them. Cities which are capable of supporting the regions in which they operate must be supported to grow in a manner that is sustainable and competitive.

Challenges such as climate change, infrastructure deficits, skills gap, and competitiveness issues must also be addressed in the NPF. These issues will only be addressed by a framework that is holistic and takes into account all of these areas in tandem and at a national, regional and local level.

Coordination will be key in addressing the challenges facing Ireland and planning for the future. Considerations by the Framework on quality of life and well being must consider all of these areas while reflecting population projections and considering where people are likely to live and work now and in the future. The integration of policies at all levels to the national plan in order to coordinate spatial planning at a national level is required. We must have a clear vision of how we want Ireland to grow and progress only then might we achieve a fully balanced economy.

Drive Regional Economic Development

A primary focus of the National Planning Framework must be to facilitate and support the effective and sustainable economic growth of Ireland's regions in a way that reflects the existing trends in population movement and the distribution of economic opportunities.

The idea that the entire country can grow at the same rate is unrealistic, but we can work towards a framework that plans effectively how those areas experiencing the most concentrated growth can feed into and benefit their wider regions. We must recognise the interdependence and connectedness of Ireland's villages, towns and cities, while acknowledging that the same plans will not work across the board and specialisation and differentiation should be reflected in the National Planning Framework.

Letterkenny Chamber supports the Issues Paper on the National Planning Framework in outlining the need to support city regions as the drivers of growth of the

country. The successful economic development of Ireland's regions is dependent on how effectively we leverage city regions as the drivers of growth. The NPF must create a strategy that ensures that each region can harness its distinctiveness, unique assets and comparative advantage to drive growth and differentiate the regions. The NPF should set out a clear strategy for regional economic development based on the concept of each region fulfilling its full and unique potential for economic growth.

The North West City Region offers a more complex but unique region in that it crosses two jurisdictions. If this region, with Derry City as its economic driver, is supported and enabled to grow it will offer unique opportunities to Ireland as a whole and to the North West in particular.

Connectivity must therefore be brought to the fore in the National Planning Framework. Ireland's regions stand to benefit greatly from enhanced connectivity in a variety of areas.

Enhanced connectedness can ensure that areas are not left behind; while all towns and villages in Ireland will not grow at a uniform pace, connectedness to drivers of growth can benefit the wider areas in which they operate. The capacity of cities to grow at a fast pace has already been witnessed in Ireland with Dublin experiencing rapid growth which has hugely affected the surrounding counties and even further afield. Without effectively planning for how such growth will affect the region we risk repeating the unsustainable growth patterns of the past.

Promote Strategic Investment

Planning and investment in new infrastructure will be essential to meet the needs of Ireland's changing demographics. CSO population predictions highlight that there will be future challenges in terms of population growth and a changing age profile within our population. Changing demographic pressures can be forecasted and provision can be made through infrastructure planning to ensure service provision can be sustainable and meet the needs of the changing society.

Key infrastructure recommendations

Connectivity must be central to infrastructure planning for the future in order to avoid the mistakes of the past. The Framework should provide a structure which will ensure that investment decisions across all types of infrastructure projects support each other in a sustainable way. Priority projects must be identified in the areas of transport, energy, broadband and housing.

Ireland is now an advanced and developed country with a growing population. Having coped over the last number of years with the recession it has emerged in some respects as a stronger place playing its part economically in the EU.

Transport

Investment in expanding, upgrading and improving the connectivity of Ireland's transport infrastructure is essential in the short term. Strategic plans should be formed in line with future spatial planning decisions and will be extremely important for future economic growth and the ability to do business. Ireland's tourism industry, import and exports, our ability to attract FDI will all be compromised without effective planning in the development of transport infrastructure.

As Ireland's economic centres continue to grow, so too must the transport connectivity within and between them. Enhancing connectivity across Ireland's regions must support drivers of economic growth but must not lead to isolation or a lack of connectedness for rural Ireland.

In terms of the North West, development of the A5, the main road route to Dublin must be a priority project. This particular project, once completed, would quickly deliver economic benefits to the whole North West region. As an area with no rail links, very much improved road transport is essential for ensuring this region meets its potential and fulfils its ambitions.

Energy

The importance of protecting Ireland's energy security is likely to increase in the coming years along with demand. Improving and expanding the electricity grid infrastructure must be prioritised to ensure our long-term energy security and to address the sustainable delivery of future energy needs.

For the North West this will mean planning for cross border interconnectors to deliver for future energy supply. The current plan for Grid development in Ireland does not take into account the fact that this County and region has ambitious growth plans even in the short term.

Broadband

Next generation broadband provision is essential for Irish business to compete and to trade internationally. Accelerated investment is required across the country to reduce the pronounced digital divide that currently exists between urban and rural areas, and to enable small and medium sized enterprises to compete on a level playing field.

Improved broadband infrastructure nationally will enable rurally based entrepreneurs to establish businesses and create employment opportunities in their own localities. It is also important that employees located in rural areas or on the edges of large towns have the opportunity to work from home and to be able to access the opportunities that city dwellers can avail of. The roll out of broadband across the country has enormous potential to connect rural Ireland and to ensure that everyone has access to the opportunities of the online global marketplace. As such this must be prioritised as a necessity not a luxury.

Sustainability and Climate Challenges

A focus on sustainability and future-proofing is important across all decision making and policy development and the National Planning Framework should reflect the important role spatial planning plays in ensuring the wellbeing of our environment. A focus on sustainability and the long term viability and climate impacts of infrastructure developments should also help to focus decision making on the key infrastructure needs of the economy.

Ireland's unique natural landscapes and environment are important national assets that must be protected in the Framework. Our ability to enhance quality of life, as well attract visitors from abroad are strongly connected to our environment and the NPF should take into account adequate protections for Ireland's natural assets and coastlines.

The North West Focus on Challenges

Obviously, over recent years, population growth has been concentrated in and around a small number of areas leading to overheating and bringing pressures on these areas. It has led not to growth in the cities themselves but urban sprawl outside the cities. The NPF must this time round be in a position to prioritise growth that will benefit the country as a whole.

It is clear that the concentration of jobs has been in and around the main cities and those working in them have settled in areas that allow for the best connectivity. Population in Donegal and Letterkenny in particular is forecasted to increase substantially over the next 20 years and therefore any National Plans need to take this into account as is being done by the Local Council. The lack of roads infrastructure and particularly motorway access if allowed to continue could discourage this growing population especially the under 30 year olds from staying in the region and unfortunately have to move to other counties for work. If connectivity was improved more investment would accrue and also a regular commute to the capital would be more possible.

The NPF is an opportunity to prioritise and improve the infrastructure significantly to enable more investment and more importantly to retain the human capital in the North West region.

Employers will of course set up and be attracted to places where there are pools of labour and people will live where there are opportunities. This all mitigates against areas where jobs are less plentiful and infrastructure is less developed.

It is important to learn from experience of the previous NSS and the gateway status and funding that was superseded by the recession. This at the time held great hope for the region and we cannot fall into the same pattern again. It is therefore very important that the NPF is a strategy backed by the Government and all departments and agencies with a subsequent plan for implementation and aligned with investment. This will give the plan credibility, acceptance and will result in a framework and implementation plans that are accepted by citizens and stakeholders.

Health & Wellbeing

In Ireland and globally we have a changing demographic with an ageing population and in the North West a population with over 30% aged under 35 years. This change will bring both pressures and opportunities.

The North West City Region offers an excellent quality of life. However, many people, choose to live in rural locations and communities. In order therefore to support and make more sustainable communities we need to offer good quality of life through good design and thoughtful place making. It is important that services and facilities are available to ensure we retain vibrant and sustainable communities.

In the North West City Region, collaboration of County Donegal with the nearest City, Derry, will become ever more important giving the region connectivity and development that will support the remainder of the Island. If we continue with the pattern of lop sided development both the capital and the rest of the country will suffer and economic ambitions will not be achieved.

Opportunities for Our Regions - North West

We understand the emphasis on Dublin as the capital city and its influence on the areas surrounding it and we understand that the NPF must address how we develop cities in an integrated manner. Ireland's regional cities which also includes Derry offer significant growth to the regions and working together with Derry makes the NW region of the scale that merits serious consideration.

We would however point out that all regions are not the same and will need differentiation. The wide ranging Northern & Western Regional Assembly will in its turn have to recognise as you have the Strategic Growth Partnership between Donegal & Derry making this a unique region within their particular remit. This will require a creative strategy and approach to regional development and we hope that the departments and government agencies will recognise it as an opportunity rather than a barrier.

It is clear from all the statistics that this region has performed well below the national average and suffered from the lop sided development that emanated from previous plans. Donegal specifically is different from Sligo & Galway and the other border counties in the region. It shares the land border with the UK which for the life of this plan will be outside the EU. This sets Donegal apart and as such a clear strategy needs to be put in place aligned with the vision set out by Donegal County Council and the Strategic Growth Partnership.

We would urge decision makers to take an approach that supports weaker regions with potential to develop and in doing so build in resilience enabling us to maximise the capability of the region as a whole.

We support a tailored approach to effective regional development building regional resilience, enabling weaker regions to recover more quickly from setbacks and focus on maximising the capabilities of the region.

Donegal and the North West City Region has clearly set out its ambitions and the NPF will help in this regard. As noted in 4.2.16 the potential for North /South collaboration is great and we already have some excellent examples across health and education that can be built upon.

The experts will say that we need to reduce the population with low skills. This requires an approach to regional skills development that will provide skilled employees for business and also attract business thus allowing us to retain skills in the region. Collaboration on a cross border basis could help deliver in this regard particularly in terms of higher education.

It should be noted that currently there are approximately 9000 third level students in the Derry / Donegal area. The Galway Region has approximately 20,000. This once again highlights the need to enhance the third level offering in the region and very importantly that the Northern & Western Regional Assembly need to take this into account when designing and implementing their regional development strategies as it is clear that what would work for Galway would not necessarily work for Donegal and the North West City Region.

We welcome the Recognition of the North West as an economic region with the Donegal strategic partnership with Derry City. We believe the North West City Region must be recognised in a similar way to the other City Regions on the island enabling the region to become a net wealth contributor. To do that we need connectivity that

translates as road infrastructure, that the University and further education sector grows significantly and that services will match our ambition. Very importantly we need a pipeline of talent to make the region a productive economic entity.

If we can see effective planning that is represented in the NPF then the region will be able to meet its full potential in coming years.

Key Questions

Letterkenny Chamber believes that the key levers for effective regional development are transport infrastructure (roads), skills development through higher & further education and connectivity.

It is important that human capital is developed through aligning skills development with business needs in the region, upskilling those who are unemployed and underemployed and capturing the skills of young people to offer them meaningful employment in their home area. We can then only retain the skills through investment and business development which again relies on infrastructure and connectivity. Education/ skills development is key to driving forward the region.

Rural Ireland

It is important that our towns and villages are provided for adequately in terms of services and facilities. In Donegal the quality of life in the rural area is balanced by being able to access the same meaningful employment opportunities as town and city dwellers.

To ensure a population of workers with skills suitable for our future investment propositions we need to have a rural population that is connected, not just in terms of access but also through technology. The national Broadband scheme can deliver equality of connectedness throughout rural Ireland and therefore it must be planned for as soon as possible to avoid further decline in rural towns and villages.

In the North west context rural Ireland is an important feeder to the larger towns such as Letterkenny. In Donegal, Tier 2 towns, provide the population and skills to enable Letterkenny to succeed and grow. We would encourage planners to ensure that the Tier 2 towns remain sustainable and accessible to support the larger economic hubs.

Ireland in an all island context

Considering Ireland on an all island basis offers excellent opportunities however we need to see alignment of the National Planning Framework with the regional development strategy in Northern Ireland and use Brexit as a focus for opportunity. Ideally we need a co-ordinated infrastructure plan and a long term regional infrastructure delivery plan to deliver effectively on an all island basis.

As highlighted in the issues paper place making does not always follow boundaries whether interregional or international. As recognised in the NPF document the North West Strategic Growth Partnership offers a cross border approach that could be used as a vehicle to accelerate sustainable growth.

UP TO 30,000 people cross the border on a regular basis with over 325,000 crossings per week on 3 roads in the North West alone, in fact 40% of all cross

border traffic related to work is on the Donegal / Derry border. This represents a huge number of employees who currently live and work in different jurisdictions and who see the border as seamless. Cross border workers have recognised the North West City Region as a whole for many years and therefore through the NPF there is a timely opportunity to address its unique proposition and develop it as a prosperous region.

There are strong functional relationships with urban centres in adjoining jurisdictions and as well as the work journeys that are many other for education, work, leisure, family and shopping. Brexit has the potential to have a significant impact on this part of the world however Letterkenny Chamber believes that if the North West Strategic Growth Partnership is given the recognition and support it requires on an all island basis it has the potential to ensure it becomes a more resilient region that can confidently seek out opportunities rather than be affected by challenges.

Infrastructure

This region however unlike the Dublin/Belfast region is not served by a motorway or even a high quality road system so border crossings are more complicated and varied. Recognition of the unique circumstances of this border region by the North South Ministerial Council and the NPF as well as Government departments on both sides of the border could deliver the necessary infrastructure that addresses the deficit and enables the region to grow economically.

There has of course been North/South co-operation in terms of City of Derry Airport and the commitment to the A5 as well as cross border greenway developments. It is important that these are recognised and built upon in future implementation strategies by relevant departments.

Energy

As noted infrastructure in terms of transport needs development and in addition a safe resilient energy supply could be delivered to Donegal on a cross border basis. The current supply will only satisfy current and short term demand. As the region develops to meet its full potential the grid will need to be upgraded and a N/S interconnector is the most suitable way forward.

Connectivity

As with roads and energy, fast and efficient broadband across the country must be planned for and implemented. The main urban centres can generally access an affordable and efficient service and here in Donegal we have the advantage of the high speed Kelvin connection and the MAN system. However, if we want all citizens to be able to access services and avail of global opportunities and to attract the type of investment that we need to make the region grow then a fast effective service must be delivered making broadband a necessity not a luxury.

Key Questions

The NPF has recognised the North West Strategic Growth Partnership as an excellent example for regional development. It is important the NPF strategy underpins the importance of this partnership and recognises that this strategy and those developed by the Regional Assembly and other departments also recognises this unique cross border region and its co-dependency. Our councils have shown leadership in developing this strategic partnership therefore we need to ensure it is fully embedded in the NPF and the departments adopt its principles to build the long term economic resilience of the North West City Region.

The current partnership brings together local government, government departments and agencies. They have involved the private sector through Chambers of Commerce and in turn our members. The NPF can support this partnership through ensuring it is clearly recognised and encourage co-operation with its counterparts in Northern Ireland.

The councils have already carried out a study that identifies key statistics for the region and from that the key priorities. This regional approach could and should be seen as an example of best practice producing a successful framework for joined up development that could be replicated elsewhere.

The resourcing of the NWSGP and the adoption of its strategic priorities will deliver a resilient region that can be sustainable and become an economic driver well into the future. As a 3 -tier city region it could then take its place as a key region contributing to the economic success of the island as a whole.

Implementation & Governance

How Government goes about implementing the National Planning Framework will be as important as the steps taken to prepare and design it. In order for the NPF to truly effect change, significant emphasis must be placed on developing a robust governance and implementation structure. This time round it must be aligned with regional development strategies in Northern Ireland to adequately support cross-border communities when it comes to planning, infrastructure and investment.

Recommendations

We welcome the approach taken by Government in these initial proposals. It is the view of Letterkenny Chamber that for the NPF to have the necessary impact, the following characteristics will need to be central to the implementation strategy of the Framework;

Co-Operation

Government now has the opportunity to support more effective regional, national and indeed all-island coordination and integration amongst a wide array of stakeholders. We recommend that the successful implementation of the National Planning Framework will require regional and national strategies to be aligned and developed in close co-operation, and should include strategies on economic development, environmental protection and sustainability, transport and energy infrastructure, broadband, and cross border cooperation.

Political Support

It is important that we achieve political buy-in from elected representatives. Any spatial planning framework may fail due to potential resistance at local level regarding planning decisions.

Flexibility

In addition, we also recommend that the NPF must be designed in a way that is flexible and can respond to unforeseen changes and challenges, both foreign and domestic, which have consequences for planning, infrastructure and economic policies within the state.

Conclusion

This initial consultation on Ireland 2040 Our Plan, is a good first step in securing the future success and ambitions of the Country. It recognises the mistakes of the past and in doing so offers a better way forward in terms of development benefitting the country as a whole.

The recognition of the regions of Ireland as differentiated and therefore needing a more tailored approach is accepted and we urge the decision makers to take this suggested approach on board. As we have highlighted the Northern & Regional Assembly covers a wide and varied geographical area and we would urge decision makers that the North West City Region is recognised alongside and with the same importance as the other City Regions.

The North West Strategic Partnership has set out ambitious objectives that the business community and other key stakeholders have fully supported in the belief that we can finally develop and grow an effective sustainable economy that retains our young people and skills, attracts investment of the type and scale necessary for growth and become a net contributor on the Island of Ireland.

As we have noted connectivity is key to the region's development. Future planning that hopes to offer opportunities for all, must ensure speedy roll out of the national Broadband Plan for rural areas and must set priorities in terms of roads infrastructure and energy supply. These issues are necessities, not long term aspirations for the North West.

The Challenges that Brexit will bring will be acutely felt in this border county and in the wider North West Region and therefore we urge everyone to look upon these challenges with creativity. A one size fits all approach will not work to deliver success and prosperity to citizens across the Island of Ireland.

The unique challenges and issues identified in this cross border region should be seen as an opportunity to deliver a sustainable regional economy that will ensure that each and every citizen can play their part in creating an Ireland that offers opportunities for all, in a vibrant region that is an attractive place in which to live and work.