



Department for

Infrastructure

An Roinn

Bonneagair

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**From the Permanent Secretary
Peter May**

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Our reference: PSDFI 234/17
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Dear Sir

DRAFT NATIONAL PLANNING FRAMEWORK – IRELAND 2040

The Department very much welcomes the opportunity to comment on the National Planning Framework. It is clear that a significant amount of work has been invested in producing the draft Framework document, building on the previous Issues and Choices Paper to produce a coherent and ambitious document to help shape the future of Ireland over the next 20 years.

In particular, we welcome the recognition the Framework gives to Northern Ireland and agree that many of the issues that remain to be addressed are mutually shared by both administrations. It is clear that there are numerous benefits to pursuing a co-operative approach, particularly in relation to shared planning challenges such as transportation, other infrastructure, environmental management, economic opportunities and tourism.

There is currently a Senior Officials Group set up under the Fresh Start Agreement which oversees progress against a number of specified North South infrastructure projects. This group reports to the North South Ministerial Council and is complementary to the existing implementation bodies and areas of co-operation.

The strong emphasis that has been placed on both administrations working together in chapter 7 of the draft Framework document is important. Implementation of the National Planning Framework in tandem with the Department for Infrastructure's Regional Development Strategy will assist in addressing the shared planning challenges faced by both administrations and this can be further supported by the existing Framework for Co-operation on Spatial Strategies between Ireland and Northern Ireland. In this way functional relationships between settlements and interactions at local and regional level can be encouraged to develop and grow for mutual benefit and economic advantage.

We welcome the recognition in the draft of the importance of the co-ordination of infrastructure development including on transport, energy and telecommunications.

We welcome the attention the Framework draws to specific cross border issues, opportunities and challenges namely: the Dublin-Belfast Economic Corridor, the potential to develop the critical mass of the Newry-Dundalk area, and the North West Strategic Growth Partnership. We note the ambitious step of introducing seven specific National Policy Objectives solely in relation to addressing the shared challenges faced by both jurisdictions. Whilst the implications of Brexit are still unknown, these National Policy Objectives will nonetheless seek to promote further collaboration between the two administrations across many social, economic and environmental issues.

We note that the Framework aims to significantly grow the population of Dublin and the four cities of Cork, Limerick, Waterford and Galway. Whilst it also aims to enable large towns to become regional drivers, it will be important to ensure that this focus on growth for Dublin and the southern half of the island is offset against the need for balanced growth across the island as a whole and for Northern Ireland in particular. In the absence of major growth centres north of Dublin, both the North West Strategic Growth Partnership and the Belfast–Dublin Economic Corridor would help to achieve the balance required.

With regard to other trans-boundary issues we are mindful that two of Ireland's river basins are shared. In order to strengthen the Framework document it would therefore be positive if reference was made for the need for flood risk to be considered on a trans-boundary basis. EU Directives currently require consultation between EEA states on the effects of certain public and private projects on the environment. There may be merit for an agreement to be put into place for that requirement to consult with neighbours to continue when the UK has left the EU.

We note and welcome the focus that the Framework places on integrating spatial and transport planning. Accordingly there may be merit in National Policy Objective 45 explicitly recognising that point.

In terms of North South co-operation you set out a range of objectives which might usefully be discussed at a Ministerial level once the Northern Ireland Executive returns. You will already be aware that we are currently preparing proposals to put to an incoming Minister for Infrastructure for discussion of the actions necessary to advance these objectives a Regional Infrastructure Delivery Plan for Northern Ireland. The development of this Plan would bring a new long term approach to infrastructure planning for the Region. It is envisaged that the plan would have a long term spatial focus on "hard" infrastructure including transport, waste, water,

energy and telecommunications. It will provide an opportunity to consider targeting appropriate infrastructure investment and to consider how it can link to the National Policy Objectives in the National Planning Framework. Co-ordination between the two jurisdictions will be required and I look forward to working with Irish Government officials as the planning for the Regional Infrastructure Delivery Plan continues.

Yours sincerely

Peter May

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