



**Comhairle Contae
Dhún na nGall**
Donegal County Council



Derry City & Strabane
District Council

Comhairle Chathair
Dhoire & Cheantar
an tSraitha Báin

Derry Cittie & Strábane
Destríck Cooncil

**Submission from the North West Regional
Development Group (NWRDG) as a joint committee of
Donegal County Council and Derry City & Strabane
District Council**

Ireland 2040: Our Plan
**Final Consultation by Department of Housing,
Planning and Local Government (IRL)**

November 2017

**SUMMARY OF KEY POINTS: THE NORTH WEST CITY REGION AND THE NATIONAL PLANNING
FRAMEWORK (NPF)**

- The North West Regional Development Group, on behalf of Donegal County Council and Derry City and Strabane District Council, welcomes the dedication of a chapter within the draft NPF to ‘Working with our Neighbours’ and, within this, specific reference to the North West Strategic Growth Partnership (p.102 & 106).
- The recognition of the importance of Derry to the growth and development of the North West City Region is welcomed. The City Region and its functional territory has a population of over 350,000. Of the current population of working age (16+), 39% have a Level 3 or above qualification. When apprenticeships are added to this, this increases to 43%. Future population projections for the City Region, and wider Northern and Western Regional Assembly area, must be flexible – and not become a barrier to unlocking the potential of the North West City Region.
- In finalising the NPF, the strategically significant ‘asks’ of the North West Regional Development Group are as follows:
 - a) As a key Regional AND National economic driver, the formal designation of the North-West City Region as a core metropolitan area – thus improving the spatial distribution of the effective growth strategy being pursued by the Government; with a Metropolitan Area Strategic Plan to be prepared through the RSES process;
 - b) All references to Derry as the focus of the City Region should also note the associated importance of Letterkenny; the cross-border nature of this City Region should be recognised and leveraged;
 - c) In infrastructural terms, to improve accessibility to, and support the growth of, the North West City Region through the:
 - Completion of the A5/N2 dual carriageway system from Dublin to Derry-Londonderry/Letterkenny serving the wider North West of the Island.
 - Completion of Ten-T routes in Donegal – the N13, N14, and N15 as key elements of a roads infrastructure network in this regional context.
 - Committing to the effective expansion of the national aviation strategy to include City of Derry Airport as a closely adjoining airport with a long-standing cross-border catchment.
 - d) Greater clarification is required on use of the term ‘North West’ in the final Framework. On occasion, it reads as though the term is being applied to a much broader area – including for example Sligo and Leitrim. When specifically referring to the Donegal/Derry region, the NWRDG ask that the term ‘North West City Region’ be applied.
- Funding should be ringfenced to enable potential opportunities and mitigate threats as they arise because of Brexit.

1.0 Background

This response is presented in the context of ongoing work by Donegal County Council and Derry City & Strabane District Council to implement its' strengthened approach to effective and resilient regional development and growth. This approach is consistent with the objectives of the North West Gateway Initiative, and is being implemented through the joint Council North West Regional Development Group (NWRDG) and the unique platform of the North West Strategic Growth Partnership (NWSGP). These structures were co-designed and assisted by involvement from the Department of Housing, Planning and Local Government, and have been endorsed by both Governments through the North South Ministerial Council (Plenary Meeting of July 2016). The NWSGP is the only local/central government partnership straddling an EU border, and is therefore quite unique in the context of strategic spatial planning and potentially the design and delivery of Brexit mitigation measures.

1.1 Purpose of this Submission

The purpose of this submission, being made by the NWRDG – See Appendix 1 – is:

1. To highlight our response as a City Region to the final draft National Planning Framework, *Ireland 2040: Our Plan*;
2. To reiterate the strategic benefits from designating the North West City Region (centred on Letterkenny-Derry-Strabane), as a strong economic, social and environmental cross-border functional territory that, like the cities of Limerick, Galway and Waterford, is an important driver of both regional and national growth.

2.0 Some General Reflections

The North West Regional Development Group (NWRDG) broadly welcomes the draft National Planning Framework, *Ireland 2040: Our Plan*. In applying many of the concepts of place-making and place-shaping, as highlighted in the Issues and Choices Paper (Feb. 2017), the document strives to apply a tailored approach to regional development that addresses both issues of scale and peripherality. The growth of the regions through a model of 'effective regional development', which has the endorsement and support of all government departments and development agencies, represents a welcome development in policy. This model depends on strong collaboration across a range of stakeholders – from central government to local government to the private sector/business interests to the third sector. This diversity of approach to different regions, including the North West Region, will be the key to releasing the full potential of the NPF - particularly given the likely challenges that Brexit will present for the Irish Economy. For the North West City Region, the newly constituted structures are designed with this multi-stakeholder collaborative approach in mind; with the potential for working groups to be established on strategic priorities as required.

The NWRDG welcomes the Chapter on 'Working with our Neighbours' and the recognition that how interaction occurs has a "major bearing on our shared prospects for progression and development" (p.98). The Group welcome the focus on working together for economic advantage, including coordinating investment, and managing a shared environment in recognition that nature does not adhere to borders. The North West City Region is already working towards these core objectives – building on an already well-established tradition of working together to the mutual benefit of the region while also, recognising the scale and diversity of need within the region, pursuing county and/or other functional territory goals and objectives.

The support to date from the Irish Government for the North West Regional Growth process is deeply appreciated. The inclusion of a short paragraph on the North West Strategic Growth Partnership as an initiative that demonstrates the value added of ‘working together for economic advantage’ (p.102) is testimony to the potential of the place-based model adopted by Donegal County Council and Derry City and Strabane District Council in collaboration with key Government Departments, North and South – including the Department for Housing, Planning and Local Government. That said, the Framework as a whole fails to build on the potential offered by this initiative which has, in the past eighteen months, been endorsed by both governments, North and South. In addition, National Objective 47 (p.102) as it relates to the development of the North West City Region, does not go far enough in that it reads as more a statement of fact, of what is happening, rather than the objective over the next twenty+ years.

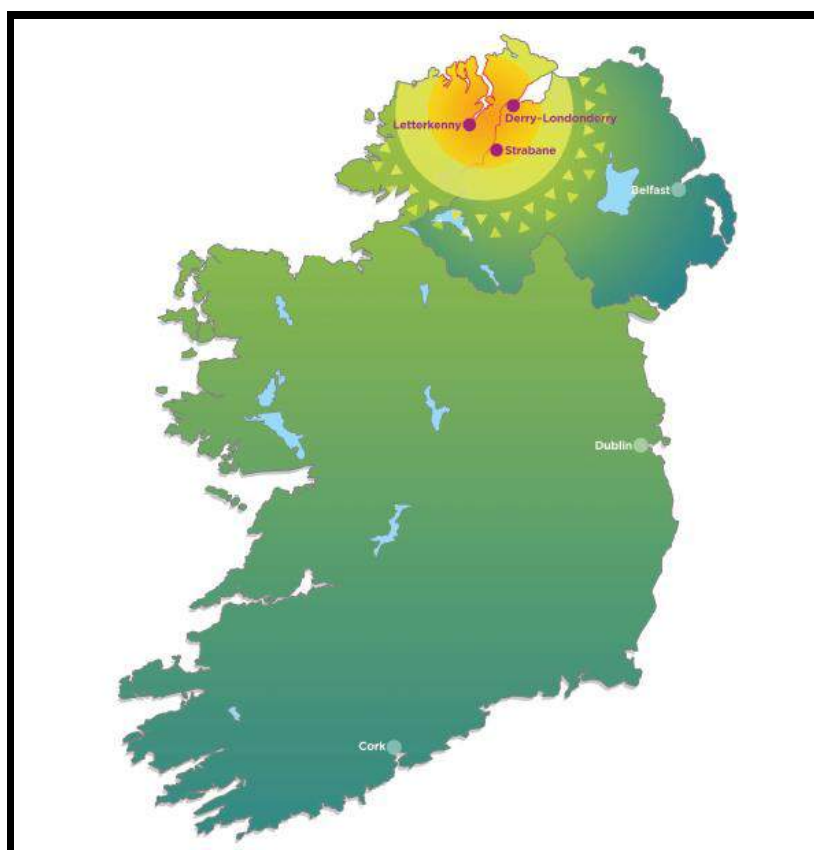
3.0 Recognising the Potential of the North West

A number of key points need to be understood about the North West Region, as follows:

- Key factors to be considered within centres deemed as national drivers include population, network with other key regional towns vis-à-vis the city region, scale of employment provision and net commuting flows, the extent of local services, administration, education particularly at third level, health, leisure and retail, the extent of the inter-dependencies or linkages between towns, and the commitment to, and prospects for, compact and sustainable growth. The work undertaken over the past five years, and last two years in particular, to build a strategic vision for the region, and mobilise key actors, is not ‘local’ in nature. Rather, this has been a transnational initiative involving both the Irish and Northern Ireland governments. The commitment of the Councils and other key strategic stakeholders will ensure that the full potential of the future growth of the North West will be realised but is dependent on a necessary designation within the NPF framework.
- Derry is the third largest city whose urban population falls within the influence of the NPF. It is also the fourth largest urban agglomeration on the island of Ireland. While the two Council areas combined have a regional population of 309,292 (2016 figures) its functional territory expands to take in a wider hinterland of 350,000 – 400,000 people. Of the current population, 34% are under 25 years of age; and 39% of the population 16years + has a Level 3 or above educational qualification. The North West City Region currently has a higher and further education student population of 40,000. The region is home to two major acute regional hospitals. Through an analysis of three of the main cross-border road networks, this region experiences over 326,577 cross-border traffic movements per week; highlighting the significance of the interactions taking place in this cross-border region.
- The wider North West City Region is both a national and sub-regional economic driver for both jurisdictions on the island of Ireland. Furthermore, it is the only functional economic region of such scale on the island which experiences a national jurisdictional border (see Figure 1).
- The commitment of the NPF to enabling growth in Ireland’s cities – as important drivers of national growth – is welcomed. It is very clear that our second and third tier cities are underperforming. But there is a spatial imbalance in the cities/city regions promoted in this final draft. The Southern Regional Assembly benefits from the designation of Cork, Limerick and Waterford; the Eastern and Midlands Regional Assembly benefits from being home to the capital city, Dublin; and the Western portion of the Northern and Western Regional Assembly benefits from the commitment to Galway. The physical footprint and scattered layout of Northern and Western Assembly area means that

investments and commitments to Galway will bring little if any benefit to the wider North West region. The spatial outcomes (and impacts) of arbitrarily drawing a line across a map from Galway to Dublin have already been well documented, whether that's the motorway networks, the rail network, the electricity network, etc. The North West is a cross border City Region, with Derry at its core as a Tier 3 City with an Urban Population in excess of 100,000 (higher than Limerick, Galway or Waterford based on 2016 Census figures); a city whose spatial footprint is already well-established in the environs of Donegal.

Figure 1: The North West City Region



(Source: Donegal County Council & Derry City and Strabane District Council).

- The theme of place-making has been central to the collaborative processes underway in the North West; and the Councils welcomed the inclusion of this theme as a core element of the NPF Issues paper. It is unfortunate that this is not as evident in this final draft document. With the development of the RSESs' now in train, the NWRDG is heartened to see the commitment of the Northern and Western Regional Assembly to building a strong focus on place-based economic development into the RSES process for the wider Northern and Western Region.

4.0 Reframing the Draft National Planning Framework

The NWRDG feels it is important to reiterate, as proposed amendments to the draft NPF are outlined, that the North West City Region (centred on Letterkenny-Derry-Strabane) is the fourth largest urban agglomeration on the island of Ireland and, in population terms, the third largest urbanised area within the NPF jurisdiction (after Cork). The Councils unequivocally welcome the

references to the North West Strategic Growth Partnership and its work within this current draft. However, for the NPF to be the 'game-changer' it originally set out to be, there is a clear rationale for the formal designation of the North West City Region within the Framework as an additional metropolitan city region that will spatially, offer a more effective regional development approach to national, and indeed all-island, growth.

(1) North West City Region as a Joint Driver of National Importance (Letterkenny-Derry-Strabane)

In its discussion on 'Ireland's Urban Structure', the draft NPF notes that "There are few large towns in the Northern and Western Region as a whole, with the strongest urban influences north of Galway City being the cross-border North West City Region focused on Derry City in Northern Ireland" (p.44). In progressing a place-based approach to economic growth and effective regional development for the border counties, the NPF must take an island of Ireland approach to spatial strategic development. Having recognised the importance of the North West City Region to the Northern portion of the Assembly's Area, the NWRDG contend that it is of both national and all-island importance that the North West City Region (centred on Letterkenny-Derry-Strabane) be designated a unique cross-border city region.

While this City Region is focused on Derry, as a Tier 3 City, its' immediate hinterland and functional relationships and interactions are deeply intertwined with Letterkenny and the wider Donegal area. As such, the City Region should be noted as being both Derry and Letterkenny. With the suburbs of Derry City reaching into Donegal, and the work to date by the Councils in setting the foundation stones for a North West City Region and developing a strategic growth plan, this region has the realistic potential to grow itself as an attractive alternative location for investment and growth. And given that it spans an international frontier, it is essential that this cross-border City Region, due to the unique circumstances pertaining, is formally designated within the NPF rather than the RSES. Given the extent of the interactions between settlements in this trans-jurisdictional region, the North West Strategic Growth Partnership is making significant strides in tackling traditions of 'back-to-back' planning and policy making in the region; and undertaking activities to tap into the potential generated by, while also mitigating against the threats of, Brexit. Key to unlocking this potential is growing the population; as such, the population projections being pursued in the NPF cannot act as a barrier to unlocking the potential to this City Region.

NWRDG Ask: That the NFP designate the North West City Region as an additional metropolitan city region, with a Metropolitan Area Strategic Plan to be prepared through the RSES process. This is a unique cross-border city region with a core role to play in national and regional economic growth and development. This designation will add value to the wider Northern and Western Region by providing a City Region focus to an under-served region characterised by historic under-investment, smaller towns, and rural peripherality.

(2) Transport and Broader Connectivity

Cross-border commuting is the 'norm' for large numbers living in the North-West City Region (see Figure 2). Quality of infrastructure is, therefore, critical to efficient and safe travel. The NWRDG welcomes the inclusion of upgraded access to the North-West border area, utilising existing routes, within the draft NPF, including:

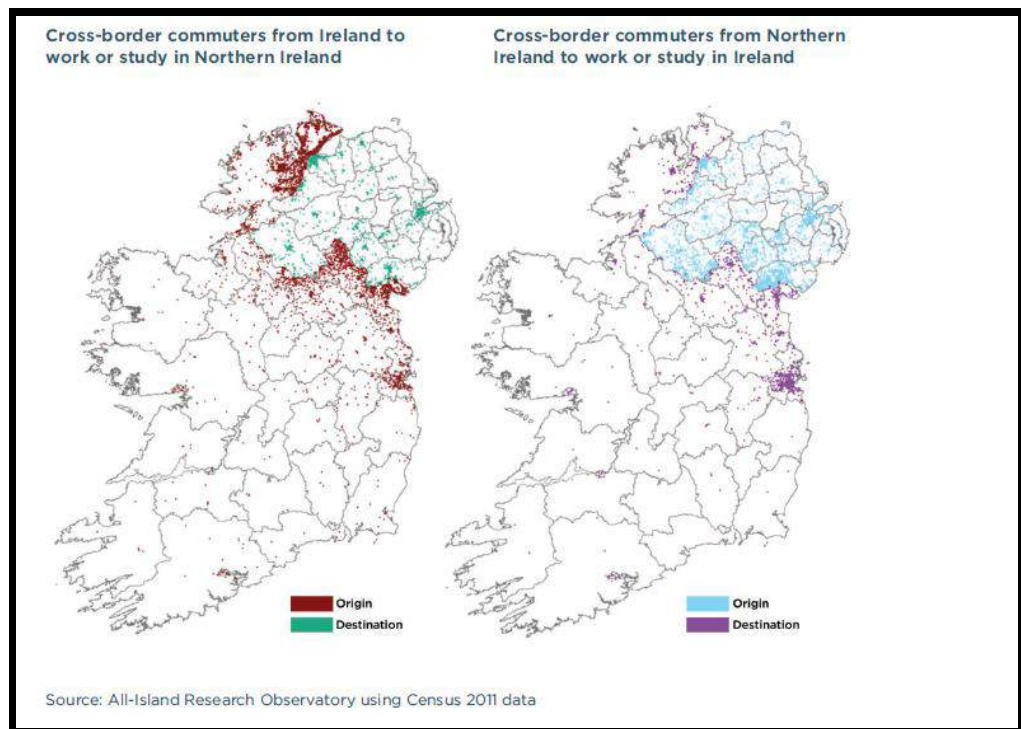
- Increased transport connectivity, incl. bus and rail services between the main cities to the North West Region (p.104);
- Enhancing accessibility between key urban centres of population and their regions incl. through the Atlantic Economic Corridor and to the larger centres in

the North-West – once the core areas in key cities and urban areas have been mobilised (p.123)

- Better accessibility between the four cities separate from Dublin and to the Northern and Western region ; with enhanced accessibility to the North-West increasing the competitiveness and attractiveness of areas more exposed to the potential impacts of Brexit (p.133)

As noted in the Framework, this includes upgrades to the N2/N14/A5 and the N15/N13 link. These infrastructural needs are, unsurprisingly, also highlighted as requiring urgent delivery within the regional growth priorities of the NWSGP.

Figure 2: Cross-Border Commuting Patterns



(Source: All Island Research Observatory).

The Group is concerned by the reference within the commitment to “Incrementally improving access to the north-west from Dublin in the east and from the other cities to the south” (p.30). As noted by IBEC-CBI in its report ‘Connected: A prosperous island of 10million people’, “Current transport infrastructure on both sides of the border is characterised by insufficient capacity and management” and that “Enhancing transport infrastructure across the island is a priority for advancing and protecting interests on both sides of the border, post-Brexit” (p.2).

Also of strategic importance is the development of the TEN-T network within the City Region. This includes the upgrade of the N2/N14/A5 to a Ten-T high quality road standard from the North West City Region to Monaghan and on to Dublin; and the development of the Atlantic Economic Corridor from Galway to Letterkenny and Derry to a Ten-T High Quality road standard. Investment in these routes will play an important role in reducing travel times for long-distance freight and passenger traffic, integrating the main urban and economic centres, and interconnecting with other transport modes. The completion of these Ten-T road projects in Donegal is vital to provide the required

access to the region, including Derry as a Tier 3 City, and to fully connect the City Region with Dublin, Galway and Belfast. They will also enable the improvement of local and cross-border linkages.

Air connectivity to Dublin in order to release the full economic potential of the City Region, together with high quality broadband, growing the capacity of the electricity grid network and the development of Killybegs as a Tier 1 Port are also considered key infrastructural priorities while also removing the perception of peripherality for future investment.

NWRDG Ask: That the NPF commit to investing in critical enabling infrastructure for the North West City Region, and that such investment is prioritised for the City Region in line with effective regional development policy (and associated positive discrimination).

(3) Education

With over 40,000 students in third level and further education in the region, the North West City Region is well-educated and offers a highly skilled workforce to existing and future businesses/industry. The size of the student population vis-à-vis the total population of the City Region demonstrates an economic potential. It represents a substantial asset for the growth of the region.

The North West Regional structures, including the NWSGP, is facilitating the City Region to maximise the available opportunities presented by the willingness of the higher and further education sector to work together across the border for the growth of the region. For example, collaboration is taking place between Higher and Further Education Institutes and key sectors and industries on skills and education progression pathways based on complementarity and progression, on further development of existing research partnerships, on progressing the concept of the 'civic university'. Mechanisms for student retention and the development of further development of links between third level education and employers are recognised as a regional priority. The significance of this issue for the North West cannot be overstated.

It is intended that the work of the North West Strategic Growth Partnership (NWSGP) will be supported by the building of new arrangements to enable collaborative strategic and operational working between UU, LYIT, and North West College. Key to the growth of the City Region is the engagement of the Higher and Further Education bodies in place-shaping and addressing the diversity of societal, economic and environmental needs within this cross-border region; this requires a partnership between government, academia, businesses and citizens – with academia playing a key brokerage role. The role of education in place-shaping and place-making needs to be more fully recognised within the draft NPF. This includes creating connections between the Regional Infrastructure Development Plan in Northern Ireland, the Regional Economic Development Strategy for Northern Ireland, and key Irish Government activities such as the National Investment Plan.

NWRDG Ask: That the NPF confirm the key role of higher and further education bodies in the regeneration and growth of the metropolitan city regions and their wider functional territories; and the value-added of the 'civic university' concept to place-making.

(4) Health

Health and social care across the island of Ireland is changing. The draft NPF predicts population growth of 1m, with other agencies such as Engineers Ireland and IBEC-CBI

predicting an island-wide population of 8m by the mid 2030s. In line with predicted population growth, life expectancy is improving. However, more people living longer creates increased pressure on the health service.

With ever-lengthening waiting lists and a growing shortage of doctors with specialisms in general practice and chronic disease management, there is a growing need for collaboration between hospitals, including on a cross-border basis, for the delivery of certain services; as already exists, for example, between Letterkenny University Hospital and Altnagevlin Hospital. This existing model validates the benefits of a cross-border approach to mapping health outcomes. Servicing a broader catchment increases the relevance of each hospital and the potential for new medical, and research, centres to open up. It creates the potential for synergies between such centres and both primary and secondary health care facilities.

Ongoing supports are required to improve access to health services in the North West City Region, including in the training of doctors. Consideration must be given to developing stronger links to the South West Acute Hospital in Enniskillen and Sligo General Hospital – thus ensuring the health needs of this region, with its large geographical footprint, are well served. Improvements to the road network would be an important contributor to this – improving access times. Economically, strengthened collaboration in service delivery would also create the potential to grow an already burgeoning bio-medical and diagnostics sector in the North West City Region.

NWRDG Ask: That the NPF strongly recognises the link between health, well-being and place as a cornerstone of strategic planning policy, and acknowledge the importance of strong(er) cross-border linkages being developed across the health sector – to ensure the health needs of the Irish border region, including the North West City Region – with collaborations being supported by increased accessibility.

(5) Atlantic Economic Corridor

The NWRDG recognises the potential of the Atlantic Economic Corridor (AEC) on the western seaboard – complimenting the Dublin-Belfast Corridor. In developing the concept of the AEC, the NWRDG agree that Galway City has a clear role to play as the central hub of the Corridor. Complimenting this, the Corridor should then be built from the two outer-ends inwards i.e. from the North West City Region to Galway; and from Waterford City to Limerick and onwards to Galway.

NWRDG Ask: That the NPF confirms the spatial footprint of the AEC stretches from Cork/Limerick to Galway and northwards to the North West City Region.

(6) Brexit

While the impact of Brexit is still not fully known or understood, it is widely accepted that the Irish border region will be most significantly impacted upon, socially, economically and environmentally. Whether these impacts are negative or positive will depend on the deal negotiated and the degree of cooperation and joint development being pursued by stakeholders in and across the border. The NWRDG is already building on its existing strong track record in this area. The proposal in the draft NPF that the accessibility of the region will be addressed after the core cities and key towns (unnamed) have been mobilised is worrying. A dedicated funding commitment is required to progress opportunities from, and mitigate the threats of, Brexit for the North West City Region as they become better understood.

NWRDG Ask: That the NPF commits to improving the accessibility to the North West City Region as a priority, and that funding be ringfenced to support opportunities being captured and threats being mitigated.

Implementation

5.0

As noted in our original submission (March 2017), it is increasingly recognised at all levels of government that how people live and work does not adhere to administrative areas but more so to functional boundaries. This needs to be reflected in the implementation of the NPF, with key delivery agents being encouraged to cooperate across and outside of their administrative borders. This is especially true of initiatives that span the common goals of economic development, enhanced connectivity, environmental management and protection and improved health and well-being.

The newly constituted collaborative structures, namely the North West Regional Development Group and the North West Strategic Growth Partnership, allows for the Region to respond in a coordinated and flexible way to both internal and external opportunities for co-operation, development and investment, including supporting the strategic priorities of central government. Led by Local Government and involving close and co-ordinated partnership working with Central Government in both jurisdictions, this new model is founded on the concept of place-based leadership as a means to delivering ongoing sustainable growth, and has best practice in spatial planning as its core driver. These structures, as designed, can further facilitate the implementation of specific commitments set out in 'A Fresh Start- The Stormont Agreement and Implementation Plan' (2015).

- 1) Through these structures, led by Donegal County Council and Derry City & Strabane District Council, all commitments to, and requirements of, the North West City Region will be managed strategically to ensure longer-term economic and social benefits.

For further information, please contact the secretariat of the North West Regional Development Group:

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Appendix 1: The North West Regional Development Group

The **North West Regional Development Group** is an all-council working group, the purpose of which is to develop, agree, implement, monitor and report on work programmes across the agreed three Regional Development Pillars (Regional Economic Growth and Investment; Regional Physical and Environmental Development; and Regional Social and Community Cohesion and Well-Being) – at least initially); and, on an ongoing basis, to promote and support a cohesive approach to North West working and the mobilisation of a range of resources to support work programmes.

The work of this Development Group will centre on 'place-building'; on aligning the priorities and objectives of the different bodies throughout the region incl. various units within local government (especially as it pertains to the LECP and Community Planning processes). It is envisaged that upon identification of priority themes, task groups will be organised around each - and will involve other relevant key regional stakeholders; which in turn would contribute to a clear diagnosis of needs, opportunities, threats, and spatial patterns.

The Development Group meets every two to three months; with membership of the Grouping including elected representatives from each Council and the CEOs and Senior Directors of the Councils. The work of the Group is supported by a secretariat – based in Derry City and Strabane District Council. Engagement with key regional partners/stakeholders and regional/national government takes place through sectoral sub-groups, with these key regional partners/stakeholders invited to participate in and attend full meeting of the Group as appropriate.

Through this model, both Donegal County Council and Derry City and Strabane District Council are stressing the importance of strategic, joined-up action - with a strong weight attached to regional advocacy.