



**Joint Business Council (JBC)
Submission**

**Ireland 2040 Our Plan: National Planning Framework (NPF)
November 2017**

Introduction

The Ibec/CBI NI Joint Business Council (JBC) welcomes the attention paid by *Ireland 2040 Our Plan*, a *National Planning Framework (NPF)* to coordinating spatial development on an all island basis and across many sectors. Given the relative invisibility of the border, businesses are organised and operate on an all island basis with production and supply chains extending across every region.

Brexit creates uncertainty but this should not limit nor prevent cross-border spatial planning taking place. The JBC ambition is for a fully connected all island approach that supports greater prosperity and employment through increased flows of people, goods, services, energy and investment.

The All island Economy that has evolved as a result, given its integrated labour market, production and supply chains, and marketing of products and services, is at risk as a result of the UK leaving the EU¹. The JBC believes an effective response to this risk needs both jurisdictions to coordinate their spatial policies and accelerating investment in essential infrastructure to enhance globally competitive growth, investment and job creation.

The peace resulting from the Belfast/Good Friday Agreement and the subsequent prosperity of the island are intrinsically linked. Peace has become the bedrock of stability, growth and investment. The prospect of a hard Brexit underlines what is potentially at risk. However, the reality is that regardless of Brexit, cross-border and all island planning will have to continue. Local and regional economies do not stop at the border.

Many businesses have chosen to organise and operate on an all island basis, and many will continue to do so after Brexit, albeit with greater difficulty. Businesses benefit from the scale provided by the all island economy. An ambitious vision for the National Planning Framework (NPF) should look to protect the benefits of the all island economy and enable its growth.

The JBC believes the response to this challenge must include building resilience in both jurisdictions by accelerating investment in effectively joined up all island infrastructures. This will enhance both jurisdictions capacity, along with that of their constituent regions, to be globally competitive for growth, investment and job creation.

Before the UK voted to leave the EU the JBC had been undertaking All Island Investment Project (AIIP) to scope the infrastructure of support needed for a prosperous island population of 10m by mid century. Brexit both presents additional challenges to this task and renders its delivery vital because it is within the control of both jurisdictions to do so

With input from Ibec and CBI NI members this JBC Submission presents a combined business response to this version of the NPF and especially it's *Ireland and Northern Ireland* section

¹ For more a more in depth description of the All island Economy see Appendix A

Context

The JBC fully supports the NPF’s strategic goal of leveraging the significant mutual benefit to be gained from coordinating planning for the provision of infrastructure needs, investment, services, education and skills on an all island basis. And there is a compelling case for doing so to underpin the island’s long term sustained prosperity and thereby helping to embed peace.

As illustrated in the previous JBC submission, because the EU Single Market was already in place from 1992, the signing of the Belfast/Good Friday Agreement underpinned the cessation of violence that enabled firms on both sides of the border to freely trade and do business. The resulting growth is now putting evident pressure on existing infrastructure.

Therefore the JBC very much welcomes the spirit, content and detail of the section on Ireland and Northern Ireland and its chapter on ‘Working together for Economic Advantage’ as a necessary starting point to developing and delivering a coordinated inter-jurisdictional planning response.

Plan for increased joint infrastructure provision

Effective long-term co-ordination of infrastructure development between Ireland and Northern Ireland should be broadened and deepened and so jointly prepare for a prosperous island of 10 million people by mid-century. This requires increased infrastructure provision on a cross-border basis, with the added benefit that such investment will help offset any negative effects from Brexit.

The North-South Infrastructure Group – set up under the Fresh Start Agreement – can be a key driver of this infrastructure planning coordination and development. Under the current transport network, considerable portions of the country, mostly in the geographic north west, lack meaningful strategic connectivity as vividly illustrated by the following maps in JBC’s ‘Connected Report setting out proposals for a truly comprehensive inter-urban all island motorway network.



Figure 1. Current Motorway Network and A Vision for an All Island Motorway Network. Source: Joint Business Council

The JBC comments, observations and suggestions set out in this submission on this key transport challenge along with the implementation and coordination of almost every National Policy Objective (NPO) with an all island dimension should begin now (eg to improve road connections to border counties in the North West region of the island before the (re)imposition of a visible border).

The all island economy and its business model are a subset of the Single European Market and its four freedoms - free movement of goods, capital, services, and labour -within the EU. It enables firms of every size and sector to develop their business by treating the island as 'a natural economic zone' for the purpose of investment growth and job creation when spatial, sectoral and/or market proximity makes this an attractive commercial proposition.

The 'scale opportunity' provided in doing so is evidently beneficial for the economies of the Republic and especially Northern Ireland. It has helped to create thousands of additional jobs and enabled hundreds of firms to grow by operating in non local markets. Crossing this island's land border is often the first step a firm takes to expand into the rest of the EU and beyond. This scale advantage also applies to cross border provision of certain public services.

A completed transport network enabling all of the island's city-regions and the rural hinterland that surrounds them to interact with one another in a more effective reliable and time-efficient manner has the potential to leverage this scale principle to an extent and with benefits, not previously experienced by businesses organisations or citizens in both jurisdictions. For example the resulting connectivity would be one of the key enablers of more balanced economic growth and a better quality of life across the island.

Case Study

Cross-border services; needs and provision

The principle of scale can also be applied to the provision of public services. Examples, such as in the provision of emergency services where both jurisdictions benefit from sharing the task in ways that are achievable, enhance operational effectiveness and are cost effective (see Figure 2 below).

A systematic and proactive stance to joint-service provision is needed. In addition to boosting cross-border co-operation, there is an opportunity for both governments to make public services more effective. The NPF should provide a platform for scoping the potential benefits to both administrations of furthering joint services provision. The urgency for doing so added to by the fact it may help to protect mutually beneficial cross border provision that is already in place.

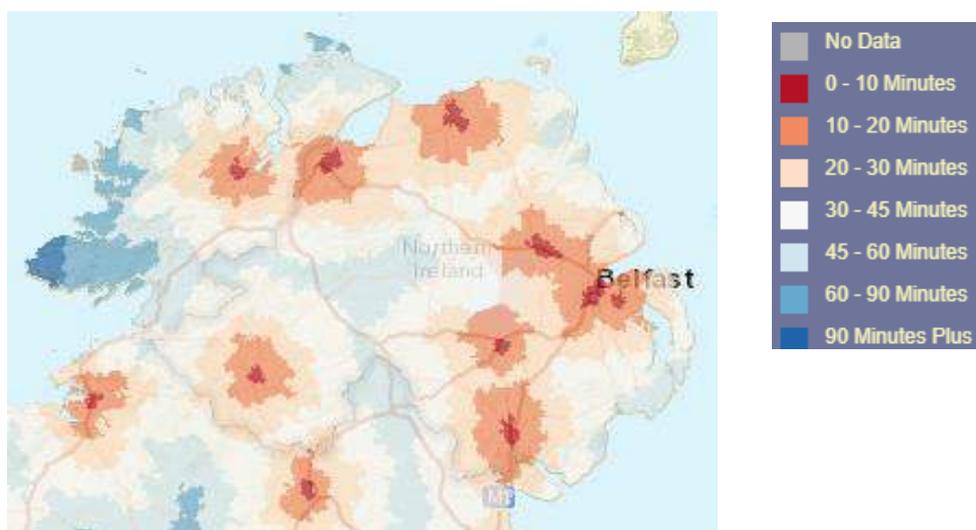


Figure 2. Cross border emergency services provision (24hr emergency hospital coverage). Source AIRO

The JBC recommends that joint-service provision should be incorporated into the NPF as a key area of cross border cooperation. When planning for the future of delivery of goods and services in Ireland, a key feature of the planning process should be to consider whether it is feasible and efficient to cooperate with service providers in Northern Ireland to deliver high quality public services. A systematic and coordinated mechanism for exploring potential instances of joint-service delivery should be developed.

In addition to capitalise on the scale opportunities presented by the regional economies and the all island economy more generally, an all island spatial planning forum should be established to align spatial planning strategies in both jurisdictions and review the implementation of the strategies on an ongoing basis in order to ensure the maximum possible benefits of all island cooperation are being achieved.

Response

The all island perspective for business

City Regions: The JBC is wholly supportive of the NPF's overarching objective to plan for a growing economy and population. But in an all island context it should be more ambitious such as by coordinated planning for a prosperous population of 10m on the island of Ireland by mid Century.

The JBC also welcomes the commitment to City Regions being the NPF's key drivers of this growth. And the commitment not to damage Dublin in the process is essential. However, in a geographic all island context there is one very evident difficulty with what is currently proposed: the jurisdictions nominated City Regions are all below a line from Dublin to Galway.

The only logical approach to addressing this imbalance is to embrace and progress the inclusion of coordinating spatial planning, development and investment of the Belfast Metropolitan City Area and Derry/Londonderry/Letterkenny City Region as essential for the success of the NPF (eg. by acknowledging this in the urban places and city regions section).

It is particularly encouraging that that Derry/Londonderry/Letterkenny City Region is designated to drive growth in the geographic north west and the North-West Strategic Growth Partnership will be crucial in this regard. The Belfast/Dublin Economic Corridor (B/DEC) will also drive growth on both sides of the border along the Eastern seaboard.

Effective connectivity: as already highlighted is the key to harnessing greater agglomeration effects from all of this growth to the benefit of both jurisdictions – broadening the pool for skilled workers, further integrating supply chains more efficiently, and allowing greater information and idea sharing between enterprises. Enhanced connectivity to reduce travel times will add to these benefits as the range people are willing to travel for work is extended with resulting productivity gains in the city and higher incomes in the city region.

All of these factors have helped to drive the development of the All island Economy. And a determination to ensure coordinated planning continues to support the equivalent growth of both cities and urban centres in every part of the island will also benefit their rural hinterland (eg as is now well know agri business is one of the largest and most important all island sectors) .

National Policy Objective 1a

The projected level of population and jobs growth in the Eastern and Midland Regional Assembly area would be at least matched by that of Northern and Western and Southern Regional Assembly areas combined.

To achieve this objective, city regions' growth must be balanced across the island. This must include city regions in Northern Ireland that drive growth parts of the border region in Ireland. This can be achieved through ambitious and proactive growth investment in regional growth strategies.

Brexit Risks: The withdrawal of the UK from the EU has evident potential to make this proposed coordination more difficult. Uncertainty has been created about the degree to which the free movement of people and business activity across the border will continue as it has operated for the last two decades. This is limiting and/or distorting how business and individual citizens are doing their cross-border planning

The scale of the possible disruption can be gleaned from even a conservative interpretation of the degree to which the following statistical estimates represent the movements of people services and goods that have an economic impact (which could include to access public services and cultural and/or sporting events):²

- Modelled estimates suggest that the total number of person border crossings is around 110 million annually with the great majority of these crossings via private vehicle.
- For the 15 principal crossing points alone there are some 43 million recorded road vehicle border crossings each year.
- Department for Infrastructure analysis using road traffic counters from the 15 principal Northern Ireland - Ireland crossing points indicates that in May 2017 there were on average 118,000 vehicle crossings at these border points each day.
- 14,800 people regularly commute across the border for work or study.
- 47% of cars in Northern Ireland shopping locations near the border are Irish registered.

Case Study: the Department is aware the JBC has set out its vision to complete a comprehensive all island motorway/high grade dual carriageway network for a prosperous population of 10m in its 'Connected' document. So the removal of the specific reference to these proposals that was contained in the last version of the NPF is disappointing.

The Republic's remarkable and rapid economic recovery and Northern Ireland's steady growth creates a shared opportunity to identify and promote strategic investments that will help to sustain a competitive, connected and more prosperous island of Ireland. But while both economies are growing, Northern Ireland has a deep-seated problem of low productivity that has to be addressed. Many businesses are investing to do so, but their individual efforts must be matched by public investment that supports the new levels of productivity they are striving to achieve.

The draft NPF acknowledges that "*better accessibility between ...Dublin and the Northern and West region will support the objectives of Ireland 2040*". In line with the strategic points made above on balanced growth of City Regions, better accessibility and reduced travel times all around the island must be an integral NPF objective.

² HM Government (2017), *Additional Data Paper: Common Travel Area Data and Statistics*, pp. 4. Available at: <https://www.gov.uk/government/publications/northern-ireland-and-ireland-a-position-paper>

A completed motorway and transport network will connect and enable city-regions and rural Ireland to interact with one another in a more effective reliable and time-efficient manner. The resulting connectivity would be one of the key enablers of more balanced economic growth and a better quality of life across the island. Improved connectivity would also bring a productivity boost to the all island market; broadening the labour pool; allowing businesses greater access to a broader supply chain; and making it easier for firms to share ideas, people, and technology. As the document says

Complementary elements of this strategy require:

- Improved accessibility between centres of scale separate from Dublin, to ensure that levels of service (travel times per km) between the Capital and Ireland's cities are replicated.
- A particular focus on improving accessibility and connectivity northwards on the emerging Atlantic Economic Corridor (AEC) that links major centres on the western seaboard.
- Improved accessibility and connectivity to peripheral regions, focused on key routes to a number of larger and regionally distributed centres.

The news that the Irish Government remains committed to funding the upgrading of the A5 is welcome. It demonstrates continued commitment to funding infrastructure in Northern Ireland that is essential to enhancing all island connectivity (eg as specified of the Fresh Start Agreement). This commitment to funding cross border infrastructure is to be encouraged and investment should continue regardless of the outcome of the Brexit negotiations.

As the JBC detailed in the previous submission, non-Exchequer means of infrastructure financing should be further utilised. Public-private partnerships and European Investment Bank funding streams have proven records of delivering strategic infrastructure. Developing a coordinated approach to this aspect of planning and financing all island infrastructure investment should also be tasked to the North/South Infrastructure Group.

National Policy Objective 2c

Accessibility to the north-west of Ireland and between centres of scale separate from Dublin will be improved, focused on cities and larger regionally distributed centres and on key east-west and north-south routes.

A commitment should be included in the final version that, alongside and integral to doing so for public transport, the development, funding and delivery of a comprehensive all island motorway and high grade dual carriageway network is completed during the lifetime of Ireland 2040

Building Stronger Regions: The NPF uses ESRI projections to 2040 to show that having accessible centres of scale is essential because:

- *the lowest per capita rates of projected population and jobs growth would be in the mid-border and north-western Counties, due in part to relative remoteness and an absence or larger cities or urban areas to drive their development (and proposes that).... future population and jobs growth would be geographically more distributed, but to a limited number of larger and regionally distributed centres, to include the north and west...(so that as a result) ...the structural weakness of Ireland's peripheral regions, and in particular the north and west, would be turned around to better harness their potential for focused investment.*

And the NPF goes on to state a second, complementary element of this twin strategy requires:

- *Improved accessibility between centres of scale separate from Dublin, to ensure that levels of service (travel times per km) between the Capital and Ireland's cities are replicated.*
- *A particular focus on improving accessibility and connectivity northwards on the emerging Atlantic Economic Corridor (AEC) that links major centres on the western seaboard.*
- *Improved accessibility and connectivity to peripheral regions, focused on key routes to a number of larger and regionally distributed centres.*

Finally the NPF notes in the context of analysis the growth of Metropolitan Regions that:

- *There are few large towns in the Northern and Western Region as a whole, with the strongest urban influence north of Galway City being the crossborder North-West City Region focused on Derry City in Northern Ireland. (3.3 P44)*

The JBC believes it could not make a stronger case for governments to ensure delivery of these high level objectives includes close coherent and collaborative coordination on a truly all island basis of their respective spatial strategies, planning approval mechanisms and investment methodologies!

National Policy Objective 7a

To achieve sustainable national growth in urban and rural areas, a National Smart Growth initiative will be put in place to support development and to leverage both public and private investment, as part of the ten year capital investment plan.

The JBC proposes first that Table 3.1 on the 'Targeted Pattern of City Population Growth' is amended to provide a island of Ireland equivalent by incorporating ambitious growth projections for the Belfast Metropolitan area and the Derry/Londonderry/Letterkenny City Region.

And the JBC proposes second that to deliver this objective the Regional Spatial and Economic Strategies (RSESs) for all of the Regional Assembly area address the potential for enhanced all island economic and transport connectivity so as to: *support large towns and their surrounding regional catchments in conjunction with consideration of growth targets for cities and smaller towns and rural areas*

Planning and Investment to Support Job Creation): the JBC notes that the three of the main areas for economic growth included in the NPF are the most developed all island sectors and core pillars of the All island Economy. However it is notable that in the sections dedicated to the agri-food sector, tourism and energy this fact is not highlighted or only referenced in a relatively minor way so that a key factor for the planning framework is omitted (although partly acknowledged and considered later in the Ireland Northern Ireland section).

Therefore the JBC submits that the final version of the NPF includes that the sectors are more joined up such as amending the relevant sections to include the all island element in a joined up way:

Agriculture

The agri-food sector is one of Ireland's most important indigenous manufacturing industries and significant aspects of the supply chain are integrated and so operate on all island basis. The resulting

economic benefits are dispersed throughout the island making it particularly vital to rural areas and the sector is playing a significant role in economic development in both jurisdictions.

Energy

The significant potential in the areas of strategic energy resources that are agri – based, particularly in the areas of bio-energy, bio-technology, anaerobic digestion and combined heat and power is noted along with the recognition that in planning the future energy landscape, and in transitioning to a low carbon economy, the ability to diversify and adapt to new energy technologies is essential.

Innovative and novel solutions for renewable energy have been delivered in rural areas over the last number of years, particularly in the areas of solar, wind and bio mass. So the evolution of the Single Electricity Market to transmit electricity generated by these new sources is vital and the development of a broader All island Energy Market could be considered

Tourism

The island of Ireland is successfully promoted and marketed worldwide by Tourism Ireland. And the great majority of visitors to the island now arrive and depart through Dublin Airport. The economy of scale this achieves benefits both jurisdictions as is evident in the current record numbers of tourists accessing all parts of the island.

Likewise, the built, cultural and natural assets which constitute the ‘raw material’ of the tourism industry that Tourism Ireland promotes and are proving so attractive in the global market place will remain essential to the ‘production capability’ of the sector. Tourism also has a unique capacity to directly and indirectly sustain communities, create employment and deliver real social benefits in rural places including the border region that other forms of economic growth struggle to generate on the same scale.

National Policy Objective 21

Facilitate the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism

The JBC proposes that the possibility these sectors will be impacted by developments that are related to the island of Ireland dimension of the NPF should be at least acknowledged and recognised especially where it is already a key element of the sectors current operations and likely future growth

An all island perspective on other Overarching Objectives:

4.7 Addressing Connectivity: The strong and successful all island dimensions is again oddly absent in the section prioritising the development of a strategic national network of Greenways and Blueways for walking cycling and boating so as to help develop rural communities and create jobs in the rural economy.

This is despite the “existing success” to be built upon includes existing and planned cross border projects and more crucially funding from and/or management by all island bodies established under the Belfast/Good Friday Agreement. This omission should be corrected in the final NPF.

5.1 Quality of Life and Place: The NPF highlights that *“Place is intrinsic to achieving good quality of life - the quality of our immediate environment, our ability to access education and healthcare services, the leisure and social interactions available to us and the prospect of securing employment, all combine to make a real difference to people’s lives”*. The NPF goes on to identify a number of areas where planning has an influential role in determining outcomes including in many instances for business and employment.

For this reason the JBC again suggests the final NPF will not be complete unless it acknowledges that each of the following areas require continuing inter-jurisdictional coordination, that up until now took place within the legal political regulatory and operational frame of joint EU membership³:

National Policy Objective 27:

It follows that the provision of safe public drinking water and adequate waste water infrastructure as well as reducing polluting emissions are key priority areas that need to be continually managed to ensure healthier outcomes for citizens.

The JBC suggests that at a minimum managing the quality of Water Catchment areas, leveraging opportunities of scale in waste water treatment (eg to use its by products) dealing with pollution and its risks and the inevitable movement of air pollution all need enhanced cooperation, coordination and/or collaboration at all levels of government and between agencies.

National Policy Objective 31:

Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life to all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services

As shown above JBC believes shared provision of the public services needed to meet this objective in both an all island (such as centres of excellence for highly specialised health services) and cross border basis (for local community services) will need considerable additional planning and effort post Brexit.

National Policy Objective 32

The expansion and consolidation of third level facilities at locations where this will contribute to regional development

Since the first Ibec and CBI discussions, coordinating third level education and training has been a shared objective. The JBC has consistently highlighted the scope for greater coordination between the two jurisdictions of training for the skills needed by business especially at 3rd level.

The departure of the UK from the EU makes in-depth consideration of how this challenge is to be tackled in the future immediate and so urgent. It therefore merits being referenced as part of the NPF especially given the location close to the border of three of the islands key institutes of education.

³ For example that is agreed set out and implemented within a supplementary Belfast/Good Friday Agreement

6.1 Integrated land and Maritime Planning:

The NPF sees its role and purpose in this arena as including:

Sovereign rights over one of the largest marine areas in Europe with a sea: land ratio of 10:1, Ireland's economy, culture and society is inextricably linked to the sea. Our marine environment is a national asset that yields multiple commercial and non-commercial benefits in terms, for example, of seafood, tourism, recreation, renewable energy, cultural heritage, and biodiversity.

It goes on to propose:

The land use planning and maritime planning processes will work alongside each other and also with other national administrations, such as Northern Ireland, regarding trans-boundary issues to ensure a consistent and effective policy and regulatory approach to marine and terrestrial planning (as) this is essential to harnessing the potential of our oceans and seas to support local communities, sustainably manage our marine resources and provide long-term investment predictability for development and activities in our maritime area (and highlights need for) Strategic Planning: Common Aims (including) Coherent Transboundary Planning

The JBC welcomes and supports the inclusion in these sections of specific references to the need for inter jurisdictional interaction and coordination especially in response to Brexit.

National Policy Objective 44

Support, within the context of the Offshore Renewable Energy Development Plan (OREDPA)26 and its successors, the progressive development of Ireland's offshore renewable energy potential, including domestic and international grid connectivity enhancements.

The JBC suggests that future grid enhancements that have an inter-jurisdictional dimension will extend beyond the construction of the N /S Interconnector and so this reality should be referenced here (although this challenge is also referenced in the Ireland Northern Ireland section)

7.1 Ireland and the EU after the UK leaves

The NPF sees its role and purpose in this arena as including

We will need to continue to improve the resilience of the economy to deal with potential changes and how we interact with our nearest neighbours in Northern Ireland, England, Scotland and Wales in European and Global context will have a major bearing on our shared prospects for progression and development

So... future iterations of the National Planning Framework will have the opportunity to take on board their practical ramifications.

*These include the potential for increased economic investment into Ireland while at the same time continuing to harness the potential of the island economy **and maintaining** the trade, infrastructural and many other linkages with our nearest neighbours. (emphasis added)*

As more becomes known about the overall shape and implications of the Brexit process, implementation of Ireland 2040 will be adjusted to take account, leading ultimately to informing the next review of the National Planning Framework.

The JBC fully supports these sentiments and its comments throughout this submission are designed to assist in that process and to emphasise the urgency of taking actions to do so

7.2 Ireland and Northern Ireland

The JBC welcomes the inclusion of this Section and strongly supports its intentions and content.

Therefore the following is presented to be positive and supportive of a effective and sustainable interaction

The NPF's high level goal is that

- *By 2040, the island we share will be home to almost 8 million people.*

Nevertheless the JBC again submits that its ambition is to see an island of 10 million people by mid-century. The NPF should be a means of planning and investing for this ambition. Doing so would, for example, avoid the risk of a possible under provision of essential infrastructure.

The JBC also fully agrees with the conclusion that

Ensuring good outcomes in terms of physical and community development and environmental quality, poses several shared challenges, including:

- *Managing our growth strategically for long term benefit in terms of economic and social development and environmental quality; and*
- *Working together for mutual advantage in areas such as economic development and promotion, co-ordination of social and physical infrastructure provision and environmental management*

Therefore where appropriate and effective JBC support the work proposed to do so such as:

- *Implementation of Ireland 2040 in tandem with the Regional Development Strategy (RDS) for Northern Ireland (to) assist in addressing these challenges.*
- *This collaborative work (being) supported by the Framework for Co-operation on Spatial Strategies between Ireland and Northern Ireland, which will be updated and reviewed as required.*

To progress the NPF's Objectives the JBC is also supportive of:

- *the three key areas and for practical cooperation between relevant Departments and local authorities in Ireland and Northern Ireland that will both support, and be supported by, the implementation of Ireland 2040:*

However the JBC first wishes to add that:

- Business began to support this kind of strategic all island coordination as far back as 1973.
- The priority areas then are the same now: roads rails ports energy and skills.
- Since then it is proven an all island approach can and does deliver mutual benefits.
- And being ambitious is one of the essential ingredients for doing so successfully.
- But while welcome in its scope the NPF currently lacks ambition.

- And NI awaits the development of its own long term and ambitious vision to coordinate with.
- Plus there are data gaps that have historically held back coordination and must be overcome.
- Connectivity is key to combining urban centred growth and rural development.
- Joined up planning and financing for all island connectivity needs to include EU Funding.

National Policy Objective 45:

Work with the relevant Departments in Northern Ireland for mutual advantage in areas such as spatial planning, economic development and promotion, co-ordination of social and physical infrastructure provision and environmental protection and management.

The JBC proposes that this work is pursued with considerable urgency and ambition commencing with the joint preparation and publication of a detailed implementation plan during 2018

As a contribution to that exercise, the following are initial suggestions for areas where cooperation and collaboration on long term strategic planning as a delivery mechanism will be central to delivering this Objective and so facilitate sustainable economic growth:

Physical infrastructure

- **Transport:** have one all island investment plan for the effective movement of people and goods (ie to include road rail and their evolution for public and private use and the impact of climate change mitigation measures and new technologies including for payment options and to do so cognisant that for the movements of goods this island is expensive even before adding Brexit related costs).
- **Interoperability:** is central to an even better future both within each jurisdiction and between transport modes that connect both and it should be planned and delivered to ensure the service is the most seamless possible and aligned to a strategic overall vision for economic growth (eg connectivity of Dublin Airports and the Ports is crucial)
- **Energy:** urgently complete the core all island infrastructure by the N/S interconnector being in operation by 2021 and in the meantime plan for the infrastructure needed by renewable energy sources (on and off shore) along with the deployment of new generation technologies that are often smaller scale energy generation and can support local needs
- **Planning:** accelerate reform in both jurisdictions internal processes to enhance their predictability and reliability and to do so in a sufficiently coordinated manner that all island projects are not disadvantaged as a result (eg were two very different processes with limited compatibility to be the result of these reforms).
- **Circular Economy:** is a rapidly emerging and evolving response to the imperative to utilise resources that are currently legally classified and treated as waste but could and should be by products with a economic value (eg as fuel). History teaches that if there is not effective all island coordination and collaboration from the beginning on the development of this circular economy then a costly problem for business as well as Govt agencies and/or illegal activity is inevitable.⁴

⁴ The cross border movement of scrap metal was one of the issues of most immediate practical concern to business in both jurisdictions and so on the agenda for discussion when Ibec and CBI NI first met in 1974

In addition Ibec and CBI NI members have expressed concern that:

- **Population:** conservative estimates for population growth for the entire island create a serious risk the optimum delivery of this NPF Objective will be undermined⁵
- **Costs of not doing:** are rarely considered and arguably no two areas of public policy have experienced the negative consequences more than areas in need of capital investment and cross border coordination, not just for business growth but also for the delivery of social and other public services
- **Scale of Investment:** needs to be commensurate with an ambitious and coordinated all island investment plan (eg there should be a shared percentage figure for capital investment of a combined GNP/ GVA)
- **Off island focus:** must permeate every aspect of this work (eg in terms of NI connectivity with GB and in marketing products and services from this island to the rest of the EU and beyond as being of high quality, competitive and reliable)

National Policy Objective 46:

In co-operation with relevant Departments in Northern Ireland, to further support and promote the sustainable economic potential of the Dublin-Belfast Corridor and enhance its international visibility

As the originator and long-term supporter of this Corridor concept the JBC very much agrees with and is proactively supporting this objective for it to be reenergised and seen in an international context.

National Policy Objective 47:

Promote the development of the North West City Region as interlinked areas of strategic importance in the North-West of Ireland, through collaborative structures and a joined up approach to spatial planning.

While supporting the NPF's intentions and aware of the priority this work is being given by both governments and the investment that is being put into it in terms of public time and money, the feedback from local members is that to truly accelerate economic development and job creation it is not nearly ambitious enough and insufficiently engages in depth with all the leading businesses.

An ambitious Derry/Londonderry/Letterkenny City Region is essential for the NPF to achieve truly balanced all island growth. And the impact of this growth needs to extend across the entire geographic north west to include every county in the region and be connected with all of the other City Regions including Belfast, Dublin, Galway and beyond along the Atlantic Economic Corridor

The NPF having this kind of inclusive connectivity and growth targets would be ambitious and Ibec along with CBI NI members are keen to consider and scope what's needed to do so.

In addition, the JBC submits that in response to Brexit it is imperative for continuing growth and job creation that the original goals and approach of the North West Partnership are evolved and adapted

⁵ For example the most recent population growth estimates by NISRA for NI out to 2040 are based largely on a presumption natural growth will be the sole major driver (eg not a significant increase in inward migration)

to effectively respond to this region's particular and unique challenges (eg as its most exposed to the potential for a negative and disruptive Brexit impact on cross border movement of people goods and services).

Therefore, the JBC urges the early production of a new and ambitious plan to progress the NPF's aims to:

Building up the economic, infrastructural and developmental ties...through local leadership and co-operation arrangements such as the co-ordination of statutory planning functions and corresponding infrastructural investment. Three key areas of focus include: Regional co-operation arrangements; Joint initiatives; and Co-ordinated spatial planning.

The JBC position on the remaining NPOs set out in this Chapter will be clear from the comments above. However it may be helpful to add some additional comments where relevant as follows:

National Policy Objective 48:

Support enhanced public transport connectivity between large urban areas in Ireland and Northern Ireland.

A full consideration on delivering this goal will include

- Private sector suppliers of public transport (eg by bus and coach)
- A rapid rail connection to Dublin Airport as part of a Dublin/Belfast upgrade
- Upgrading completing and maintaining the entire all island core road transport network
- Installing the infrastructure needed for rapid growth in electric vehicles
- Identifying locations for transfer points between public roads and/or rail transport services
- Coordinating digital payment mechanisms including for tolls

National Policy Objective 49

Strengthen all-island energy infrastructure and interconnection capacity to enhance security of electricity supply.

This will have international as well as all island dimensions to be coordinated (eg local area heat distribution networks; Celtic Sea electricity connection to France; gas pipelines to Scotland; upgrades of links to Wales).

National Policy Objective 50:

Develop a stable, innovative and secure digital communications and services infrastructure on an island basis.

In the JBC's experience this is one of the most challenging of the NPF's Objectives. For example there is no equivalent to the all island single digital market like there is for electricity. Indeed the creation of an EU Single Digital Market has not to date been the catalyst for both governments to lead discussion on one.

And a Brexit risk is the reversal of the progress that has been made to eliminate roaming charges and to coordinate the enhancement of data protection. So for all of these reasons JBC will await and looks forward to practical proposals being presented to coordinate progress on this NPO.

National Policy Objective 51

Support the coordination and promotion of all-island tourism initiatives through continued cooperation between the relevant tourism agencies and Tourism Ireland.

Tourism Ireland is one of the leading exemplars of the benefits of scale that an all island approach can and does deliver. So once again the JBC requests a plan and details for what precisely is to be coordinated especially in response to Brexit and the possibility of additional checks and/or restrictions on tourist movements (eg as the official figures show the majority of tourists to NI come via the Republic)

National Policy Objective 52

Ensuring effective management of shared landscapes, heritage, water catchments, habitats, species and trans-boundary issues in relation to environmental policy.

JBC suggests the delivery of this Objective is practically impossible until there is clarity on how Brexit is going to impact this island where geography and natural landscapes create the inescapable need for trans-boundary management.

National Policy Objective 53:

In co-operation with the United Kingdom Government and devolved Governments of Northern Ireland, Scotland and Wales, Ireland will support mutually beneficial development in the areas of spatial and infrastructure planning and other related areas.

The JBCs general comment is as per the previous point, but would specifically add that in order to protect it and the gains it has delivered, evolving the East/West as well as North/South Strands of the Belfast/Good Friday Agreement offer one of the few avenues that would enable this Objective to be effectively delivered within an agreed and existing political and legal framework.

Implementation

In the light of the above comments the JBC notes and is keen to explore how it might support implementation as described in the NPF on P125 in particular as it operates as a strong all island partnership between two of the leading representative organisations for business Ibec and CBI NI.

Therefore JBC proposes that as a matter of utmost urgency that the following is progressed to broaden deepen and strengthen all island partnerships to maximise the potential of the all island economy by means of:

- *Cooperation and interaction through political and administrative structures such as the North-South Ministerial Council and the British-Irish Council...to include a specific national planning and infrastructure coordination stream of activity transportation*
- *Initiatives that improve connectivity and the integration of our transport, energy and communications systems as well as measures aimed at sustainably managing and harnessing the natural characteristics of areas new resources for tourism development and promotion.*

- *National investment planning, the sectoral investment and policy frameworks of departments, agencies and the local government process being guided by these strategic outcomes in relation to the practical implementation of Ireland 2040.*
 - *And despite the challenges posed by Brexit, recognising the strong economic, cultural and practical ties between Ireland and its neighbours, both in a north-south and east-west context,*
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Investment

9.3 Ireland 2040 and the National Investment Plan: the JBC supports the broad consensus that

- *Public infrastructure investment is an important aspect of a competitive location policy, impacting on an economy's or region's cost structure and competitiveness.*

It also notes the NPF concern to:

- *avoid the significant risk, whereby not achieving the economy's full potential will give rise to a shortfall in Ireland's economic performance with serious and long-lasting consequences for future living standards and the quality of life overall, across all regions of the country.*

The JBC would concur and add that is necessary to do so for all regions of the island in order to:

- *Deliver a stable profile of public investment yielding greater certainty to the infrastructure delivery and investment sector.*
- *Strengthen the economy's resilience in terms of key risks, in particular Brexit.*
- *Address existing critical infrastructure deficits.*
- *Invest to maintain the quality and performance of existing public infrastructure.*
- *Support the achievement of critical climate change goals including the recently published National Climate Mitigation Plan.*
- *Secure more effective regional development on an on-going basis.*

For the National Investment Plan to deliver these objectives the members of Ibec and CBI NI support the compilation on all island basis (eg by the N/S Infrastructure Group):

- A central database of proposed projects that have been appraised by sectoral Departments, from which funded projects can be selected by both Governments
- Use this 'Project Pipeline' list to avoid and reduce the risk of standalone and sectoral plans' that are uncoordinated in a all island context.

The JBC welcomes the detail provided in the NPF on specific road projects and in particular the A5 but observes that they do not represent a coordinated and comprehensive all island plan to ensure the city regions north of a Dublin-Galway line are effectively and comprehensively connected to the rest of the island, including in the context of the Atlantic Economic Corridor.

Sustainable mobility: The JBC fully supports the development of the intercity rail network as integral to offering sustainable travel alternatives including to:

- *Broaden labour catchments to the benefit of the international competitiveness of the island's major cities. And*
- *Deliver on the potential to develop the existing good quality rail links between Dublin and Belfast*

While the JBC also supports the inclusion of Cork into an island rail spine through line speed and service enhancements, as a practical operational and regulatory matter these are two separate and distinct projects and so would both benefit from being progressed in parallel (ie not make progress for one dependent on the other).

In addition the JBC welcomes the proposal to:

- *Strengthen public transport connectivity between cities and large growth towns in Ireland and Northern Ireland with improved services and reliable journey times.*

However it is crucial that this investment is presented on a ‘whole of project’ basis, especially where there is an all island dimension and it is essential to support the overarching objective of facilitating economic growth and job creation including in the all island economy.

Finally the NPF does not reference accessing private finance as part of this investment drive. Given that few countries have rapidly reduced an accumulated backlog and deficit of public infrastructure investment, and especially one on the scale of NIs, this is arguably not a sustainable approach.

JBC suggests instead that certainly in a all island context relying on Exchequer funding alone will not deliver what is needed to achieve a number of the NPOs, and particularly in response to Brexit.