



Paul Hogan

Senior Advisor – Forward Planning

Department of Housing, Planning and Local Government

Custom House

Dublin D01 W6XO

Dear Paul,

We have taken the opportunity to review the current draft of the National Planning Framework (NPF) document and, in doing so, acknowledge the efforts made by your Department to include the concept and objectives of the Atlantic Economic Corridor (AEC). Unfortunately, the substance of the document remains as originally cast in the first draft.

We understand the frustration and disappointment expressed by many other NPF stakeholders. The AEC Chambers' response is set out in this letter and the attached document. Our focus is less about the detail and more about the key points of principle. We offer suggestions on how the final draft of the NPF could focus on the opportunity to realise the hidden, untapped potential of the AEC, with the strategic objective of contributing to national growth.

Clearly, we agree with the analysis that suggests a change to a regionally balanced approach to economic development. However, the planning framework is based on current economic patterns of employment and population density and therefore, ignores the fundamental economic challenge of depopulation of the West, North West and Border regions and the underutilised capacity and assets across the corridor at a time of increasing congestion in the Greater Dublin Area.

The AEC strategy (published last year and presented by the Chambers group in our submission to the NPF) proposes that we move towards a more balanced economic model within the Atlantic regions. The new economic model must be built on the sustainable development of our natural resource base and should create a unique inter-dependence between FDI and a new base of existing and innovation-led SMEs. The combination of strategic investment in infrastructure, the creative potential of people and communities and the untapped comparative advantage of places can provide the foundation for a linear city composed of urban and inter-urban areas. Each will have their own autonomy but with the common ambition to collaborate in new forms of development based on the:

- Creativity and ingenuity of all the people in the region
- Vast and unique economic potential of our natural and human resource base
- Technologies and intellectual property developed by our higher education institutions and research community and exploited through an emerging innovation-led eco-system

- Strengths of existing sectors such as engineering, med-tech, ICT, pharma, financial services, professional & business services, and aviation, combined with the potential of natural resource-based sectors including tourism, agri-food, energy and, most importantly, all marine-related sectors.

Unfortunately, there is no macroeconomic plan to guide the NPF and to ensure long-term return and contribution to sovereign wealth. This, we believe, is a critical omission in any National Planning Framework and leads to a focus on investment constraints rather than a focus on addressing the challenges that are material to real economic growth.

Realising, as we do, that change comes slowly and ambition is best realised through collaboration and cooperation, we would like to ensure that:

- A. The Atlantic Economic Corridor is formally recognised as a key element and outcome of the NPF
- B. There is an explicit acknowledgment of the need for a change to economic development focusing on comparative advantage and the sustainable development of our natural resource base
- C. The AEC Taskforce will be responsible for delivering this change and facilitate the creation of whatever economic development instrument is necessary to successfully transition and grow the economy of the Atlantic regions
- D. The NPF will not constrain the development of the AEC in any way

We again acknowledge the support of our colleagues from various departments within the Taskforce in furthering the AEC initiatives. We will continue to work with our colleagues in the Taskforce, to build a new partnership of Business, Communities and Public Organisations, in a collaborative and cooperative pursuit of our common goal of maximising our country's potential.

With best regards

Mike Devane

Chair AEC Chambers Group

c.c. William Parnell, Assistant Secretary, Department of Rural and Community Development

The Atlantic Economic Corridor (AEC) is an initiative of the Chambers of Commerce of Shannon, Ennis, Galway, Roscommon, Mayo, Sligo, Leitrim, Limerick, Tralee and the American Chamber of Commerce.



**Atlantic
ECONOMIC**
Corridor



Atlantic Economic Corridor

Response to National Planning Framework – Ireland 2040 Our Plan

10 November 2017

1. Atlantic Economic Corridor – Key Points in Response to NPF

1.1 Atlantic Economic Corridor

The Atlantic Economic Corridor (AEC) is an initiative of the Chambers of Commerce of Tralee, Shannon, Ennis, Galway, Action Tuam, Roscommon, Mayo, Sligo, Leitrim, Donegal, Letterkenny, the American Chamber of Commerce. Collectively we represent **80,000 employees, in 2,725 Irish-owned and multinational firms** in the mid-west, west and north-west.

The AEC strategy of February 2016 set out the objective of an Atlantic Economic Corridor, with a ‘city of scale’ from Limerick through Galway to Sligo, to match Dublin and Cork in success in developing infrastructure, attracting Irish and multi-national investment, and growing jobs and wealth in vibrant communities. This objective was recognised in the Programme for Government with a commitment to the development of a new Atlantic Economic Corridor and also the establishment in March 2017 of the AEC Task Force.

1.2 AEC Submission to NPF March 2017

The AEC provided a detailed submission as part of the NPF consultation process. This recognised and agreed that a strong country needs a strong capital, strong and strong tier two cities. However, the AEC argued strongly that promotion of one or more of the four regional cities is just one part of the required long term and transformational growth. A key point that underpins the AEC is that we want to build on the strengths of the AEC cities and larger urban centres but also **connect them and reinforce the links between them and rural areas**.

1.3 AEC Response to NPF Draft Ireland 2040 Our Plan

There was a gap between the vision of the Draft National Planning Framework and the Government commitment to pursue the Atlantic Economic Corridor. While there are welcome references throughout the latest draft to the corridor, the gap between this commitment and the written plan/policy remains.

The draft NPF proposes that between now and 2040 Ireland concentrates on the continuing growth of Dublin while also moving towards the development of the four cities of Cork, Limerick, Galway and Waterford. Two critical outcomes targeted by the NPF for these five cities are:

- **Compact, Smart Growth:** Carefully managing the sustainable growth of compact cities and towns
- **Enhanced Regional Accessibility:** Once the core areas in key cities and urban areas have been mobilised, the next priority is to enhance accessibility between key urban centres of population and their regions such as the key cities of Cork and Limerick and through the Atlantic Economic Corridor

A number of other outcomes are also documented but these two bring AEC concerns into focus.

- Firstly, the opportunity for a North West City Region is missed creating a significant gap in the vision of a series of linked cities along the Atlantic Corridor.
- Secondly, enhanced regional accessibility should not have to wait for mobilisation of core areas as accessibility is an enabler of this goal.
- Thirdly, there is also a critical missing piece, **Regional Linkage**. If we are to avoid replicating in other cities the mistakes of concentrating decades of our country’s growth in Dublin we must ensure that these smart growth centres are actively engaged in the kind of co-operation and actions that will not just build on their strengths but also connect and reinforce their links to one another and their surrounding areas.

This requires the formal recognition of the Atlantic Economic Corridor as a key element and outcome of the NPF. This means **designating the Atlantic Corridor as a strategic development zone**. Something similar has happened with the Greater Dublin Area (GDA) with all local, regional, national authorities as well as state agencies formally co-ordinated and integrated in pursuit of the development of the strategic zone. Government and its agencies must show they are acting in a fully integrated manner. In the absence of a clear policy statement and strategic designation of the AEC as an NPF outcome, there will be no incentive for linkage between the proposed Regional Spatial and Economic Strategies (RSES) and the opportunity to make a real difference will once again have been lost.

2. Proposed Changes to NPF Draft to Deal with AEC Key Points

Section 1.3, page 24 Current Draft

Section 1.3, page 24 Proposed Change

Ireland 2040 - Our Plan | Draft National Planning Framework

1.3 | How the National Planning Framework will be Different

The National Planning Framework will differ from the NSS in that, further to a key planning recommendation of the Mahon tribunal, it will have legislative backing and be placed on a statutory footing. Implementation of the NPF through the planning system will be overseen by the new *Office of the Planning Regulator* which is being established, also on foot of a Mahon tribunal planning recommendation.

Unlike the NSS, the objectives of the NPF will be applied on a regional basis through statutory Regional Spatial and Economic Strategies (RSEs). These are new plans that will address more detail at a regional scale, being prepared by each of the three Regional Assemblies that were established in 2014.

The RSEs must accord with the National Planning Framework and in turn, local authority development plans which address further detailed local matters, such as the zoning of land, must be in accordance with the RSEs.

Critically, the NPF sets the context for a new, ten-year national investment plan from 2018-27. This ensures alignment across government and establishes firm links between the Planning Framework and long-term capital investment. Both the NPF and ten-year National Investment Plan (NIP) are to be published as companion documents and will be subject to evaluation and review.

State explicitly that the Atlantic Economic Corridor is a key element and outcome of the NPF:

The Atlantic Economic Corridor is a strategic development zone with all local, regional, national authorities as well as state agencies formally co-ordinated and integrated in pursuit of the development of the strategic zone. The Regional Spatial and Economic Strategies (RSEs) will take this into account and demonstrate how each RSE links to the others in order to produce the required outcome.

2. Proposed Changes to NPF Draft to Deal with AEC Key Points

Section 1.5, page 26 Current Draft

Ireland 2040 - Our Plan | Draft National Planning Framework

1.5 | What Success Looks Like - Objectives and Vision

HIGH-LEVEL OBJECTIVES

- 1** In addressing future change, Ireland will continue on a path of economic, environmental and social progress that will improve our prosperity, sustainability and well-being.
- 2** Ensuring that Ireland's many unique assets can be built upon, with an emphasis on improving economic output and stability as well as quality of life, environmental performance and the liveability of Dublin, our cities, towns and rural areas.
- 3** Setting out likely future change in Ireland and the spatial pattern required for effective and co-ordinated investment in a range of sectors to best accommodate and support that change.
- 4** Putting in place a strategy for the sustainable development of places in Ireland and how that can be achieved, through planning, investment and implementation.

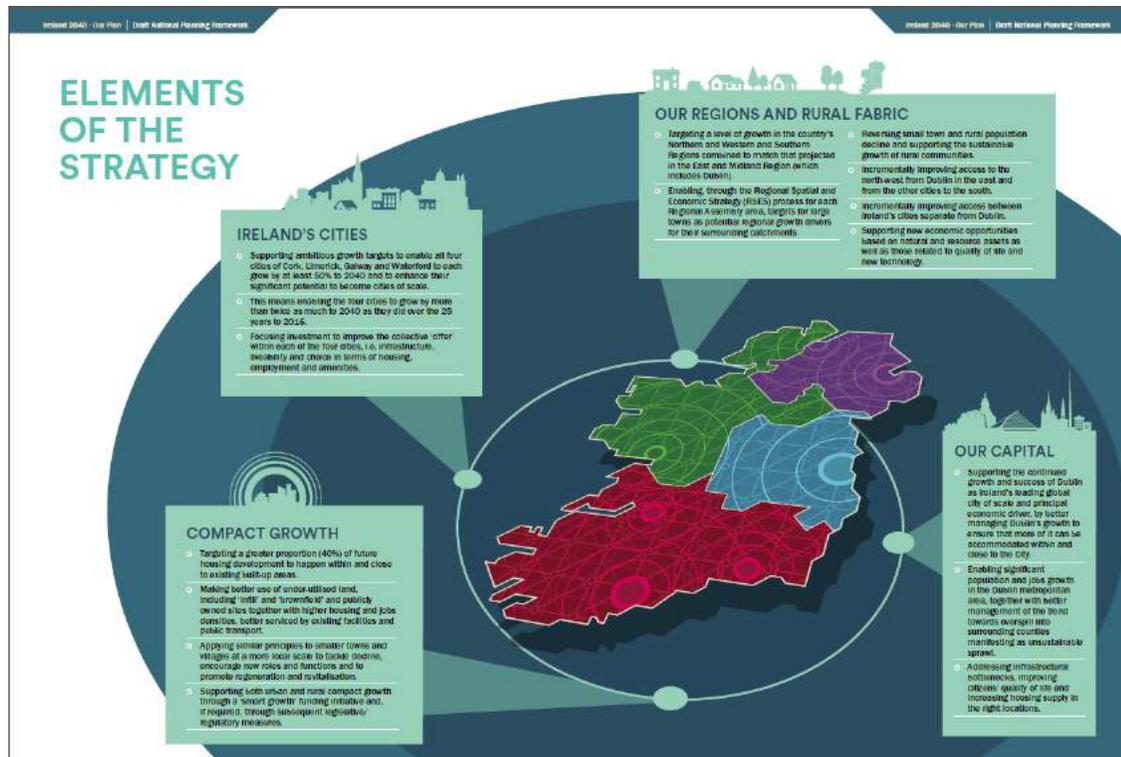
Section 1.5, page 26 Proposed Change

Add an additional item 5:

- 5** Realising the hidden, untapped, present opportunity for social and economic prosperity by developing linked cities of scale and urban/inter-urban areas in the Atlantic Economic Corridor

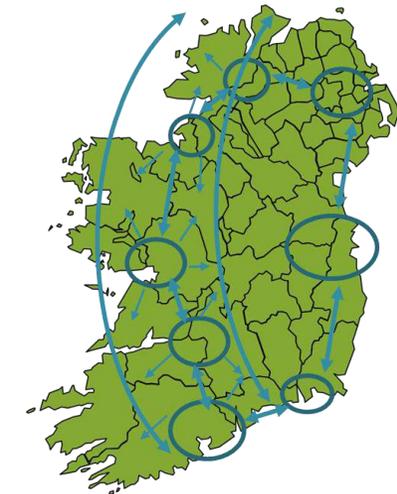
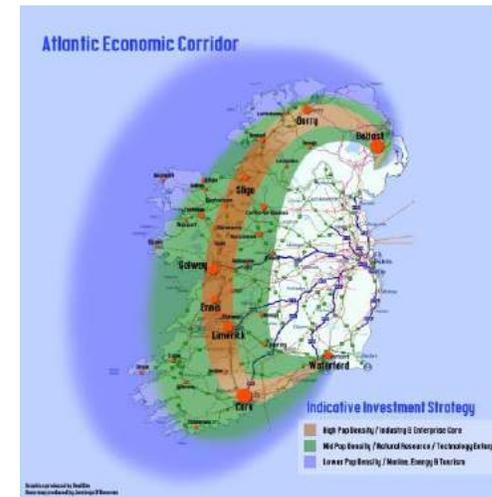
2. Proposed Changes to NPF Draft to Deal with AEC Key Points

Section 2.1, page 30 to 31 Current Draft



Section 2.1, page 30 to 31 Proposed Change

Change the graphic so that there is less emphasis on administrative regional boundaries and more on zones of economic potential which cross such boundaries.



Reword the content of "OUR REGIONS AND RURAL FABRIC" box so that words like "incremental" are replaced with "strategic" and to reflect the key principles of connectivity, community, co-operation. These are required to deliver the linkage between growth centres and spill over effects to surrounding areas which are critical to transformation and elimination of the business as usual approach.

2. Proposed Changes to NPF Draft to Deal with AEC Key Points

Section 2.2, page 32 Current Draft

Section 2.2, page 32 Proposed Change

Ireland 2040 - Our Plan | Draft National Planning Framework

2.2 | Strategy Development

Practical experience and research shows that in an economy and society such as Ireland's, simultaneously fostering economic growth on the one hand and spreading it out smoothly or evenly across a country, is neither realistic nor practical. Nor can large numbers of people be directed to selected locations.

However, it is possible to facilitate more inclusive and integrated growth more broadly, throughout Ireland, that would have the potential to be transformational in the long run through policies that:

Reword the second paragraph to reflect the opportunity provided if we focus on realising currently underutilised potential:

However, it is possible to plan for strategic development zones such as the Atlantic Corridor with the aim of utilising and realising the potential of assets that would deliver transformational change in the long run through policies that:

2. Proposed Changes to NPF Draft to Deal with AEC Key Points

Section 2.3, page 35 Current Draft

Accordingly, the Ireland 2040 target in relation to growing our regions is:

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.

In terms of Ireland's future population, targeting this pattern is significant because it represents a shift from projected trends. In the context of around one million additional people in Ireland by 2040, it means planning for:

National Policy Objective 1b

- Eastern and Midland Region: a targeted 475,000 - 500,000 (0.475-0.5m) additional people, i.e. a population of around 2.8 million;
- Northern and Western Region: a targeted 150,000 - 175,000 (0.15-0.175m) additional people, i.e. a population of around 1 million;
- Southern Region: a targeted 350,000 - 375,000 (0.35-375m) additional people, i.e. a population of almost 2 million.

In similar terms, applying the ESRI projections for up to two-thirds of a million additional jobs in Ireland by 2040 means planning for a pattern of:

National Policy Objective 1c

- Eastern and Midland Region: around 330,000 (0.33m) additional jobs, i.e. at least 1.33 million in total;
- The Northern and Western Region: around 110,000 (0.11m) additional jobs, i.e. at least 450,000 (0.45m) in total;
- The Southern Region: around 220,000 (0.22m) additional jobs, i.e. at least 880,000 (0.88m) in total.

Section 2.3, page 35 Proposed Change

The draft set of policy goals would deliver an additional 1m in population and 0.66m in jobs distributed as follows to each of the administrative regions:

	EMRA (50%)	SRA (33%)	NWRA (17.5%)
Population	500,000	375,000	175,000
Jobs	330,000	220,000	110,000

Why plan for 50% on both parameters to the East and Midlands, effectively the Greater Dublin Area? Yes we need a strong capital city but it must be a functioning and uncongested capital. We must have a country where no asset is left underutilised while congestion leads to a continuous cycle of unsustainable reinvestment in response to urban sprawl. Why not develop an alternative or a number of alternative scenarios which would show growth at a lower percentage for EMRA and the impact of a true Atlantic Corridor on the SRA and NWRA?

Swap the 50% and 33% allocations between the EMRA and SRA respectively. **A real ambition to go beyond business as usual would go further with a 17.5%, 50% and 33% allocation between EMRA, SRA and NWRA, respectively.**

2. Proposed Changes to NPF Draft to Deal with AEC Key Points

Section 2.4, page 36 Current Draft

2.4 | How to Build Stronger Regions - Accessible Centres of Scale

On a 'business as usual' approach, the ESRI projection to 2040 indicates that the highest per capita rates of population and jobs growth are likely to occur in Dublin and the four surrounding counties, as well as Cork and Galway, with almost 40% of additional jobs projected in Dublin alone.

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 of larger cities or urban areas to drive their development.

Under 'business as usual', a continued focus on growth in and around Dublin and to some extent the four other cities without addressing specific development challenges facing other regions such as the accessibility and urban structure of the north-west or the economic underperformance of the South-East, would have negative consequences that would further add to growth pressures in the wider Dublin Region and inhibit more peripheral parts of Ireland from realising their full potential.

In considering alternative options, the two key

On the other hand, the 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.

Section 2.4, page 36 Proposed Change

This is the first reference to the Atlantic Economic Corridor in the current draft of the NPF.

If earlier points in this document are taken on board there will be a stronger background to this reference. At present there is no context or communication of the transformational potential of developing linked cities of scale and urban/inter-urban areas in the Atlantic Economic Corridor.

2. Proposed Changes to NPF Draft to Deal with AEC Key Points

Table 2.1, page 39
Current Draft

Table 2.1 | Ireland 2040 at a Glance: Targeted Pattern of Development through key National Policy Objectives

National Policy Objective	Eastern and Midland 2040	Southern 2040	Northern and Western 2040
Growing Our Regions	+ 475,000 - 500,000 people (2.8m total) + 330,000 jobs (1.33m total)	+ 350,000 - 375,000 people (2m total) +220,000 jobs (880,000 total)	+150,000 - 175,000 people (1m total) +110,000 jobs (450,000 total)
Building Accessible Centres of Scale⁴⁵	Dublin City and Suburbs: +265,000 people Growth of other towns to be determined by Regional Spatial and Economic Strategies (RSEs) within overall National Framework	Cork City and Suburbs: +115,000 people Limerick City and Suburbs: +50,000 people Waterford City and Suburbs: +30,000 people Growth of other towns to be determined by Regional Spatial and Economic Strategies (RSEs) within overall National Framework	Galway City and Suburbs: Up to +45,000 people Growth of other towns to be determined by Regional Spatial and Economic Strategies (RSEs) within overall National Framework
Compact Smart Growth	50% new housing on infill/brownfield (Dublin City and Suburbs) 30% new housing on infill/brownfield (elsewhere)	50% new housing on infill/brownfield (Cork, Limerick and Waterford Cities and Suburbs) 30% new housing on infill/brownfield (elsewhere)	50% new housing on infill/brownfield (Galway City and Suburbs) 30% new housing on infill/brownfield (elsewhere)

Table 2.1, page 39
Proposed Change

The same comments made earlier for Section 2.3, page 35 also apply here.

Swap the 50% and 33% allocations between the EMRA and SRA respectively. **A real ambition to go beyond business as usual would go further with a 17.5%, 50% and 33% allocation between EMRA, SRA and NWRA, respectively.**

World class connectivity between the six city regions (i.e. including the North West City Region as outlined earlier) would be a powerful commitment and agent for balanced regional development.

The litmus test for a commitment to such a vision is the inclusion in the NPF, and the subsequent National Investment Plan, of a commitment that the promised revision of the TenT CORE Network map to include the territory between the Limerick City Region and the North West Region will be delivered as indicated in the most recent Programme for Government.

2. Proposed Changes to NPF Draft to Deal with AEC Key Points

Section 3.7, page 49 Current Draft

3.7 | Urban Employment Growth

The pattern of urban growth targeted in Ireland 2040 is population and capacity led, recognising that firms and enterprise development are predominantly drawn to urban locations, driven by market forces such as agglomeration, migration and specialisation that depend on factors such as scale, accessibility, innovation supported by third level institutions and quality of life.

Projected employment growth in Ireland to 2040 although significant, is ultimately subject to our capacity to accommodate it. Sustainable enterprise thrives in supportive business environments that enhance competitiveness and productivity with good supporting infrastructure. There are also critical links between the quality of urban place-making and business investment/job creation. Place-making is identified as a key differentiator in *Enterprise 2025, Ireland's National Enterprise Policy 2015-25*.

The Ireland 2040 strategy is to focus a significant proportion of population growth in Ireland's Cities, while also seeking to improve urban infrastructure, liveability and the quality of the built environment. This approach intended to ensure that we continue to provide an attractive range of enterprise development opportunities in the face of changing employment activity and sectors.

At an urban scale, it is important to identify locations where enterprises can access competitively priced development lands, utilities and commercial properties to the highest standards available internationally. Planning to accommodate strategic employment growth at regional and local level should include consideration of:

- Current employment location, density of workers, land-take and resource/infrastructure dependency, including town centres, business parks, industrial estates and significant single enterprises.
- Locations for expansion of existing enterprises.
- Locations for new enterprises, based on the extent to which they are people intensive (i.e. employees/customers), space extensive (i.e. land), tied to resources, dependent on the availability of different types of infrastructure (e.g. telecoms, power, water, roads, airport, port etc.) or dependent on skills availability.

In addition to the five cities, there are opportunities for other urban areas and in particular well-connected towns that are accessible to a significant population catchment and/or can offer a good quality of life, to accommodate employment growth.

Section 3.7, page 49 Proposed Change

There are good examples along the Atlantic Economic Corridor of ways in which the principles set out in Section 3.7 can be implemented and developed in a way which maximises the key outcome of reinforced linkage set out in Section 1 of this submission.

For example, Limerick and Galway, two geographically close cities with motorway and rail connectivity, along with large towns Ennis (pop >25k) and Shannon (pop >10k), provide a city of scale and a central hub along the Atlantic Economic Corridor. Serviced by international air and deep water port facilities, third level institutions and an established and growing industrial and business base, this larger regionally distributed centre is ideally positioned to accommodate employment growth and provide excellent quality of life.

2. Proposed Changes to NPF Draft to Deal with AEC Key Points

Section 4.4, page 66 Current Draft



4.4 | Rural Towns

Rural towns perform as local drivers for their surrounding areas through well-established economic, administrative and social functions. They support clusters of services, have a significant share of homes and jobs, and act as transport hubs for a much wider rural community.

Section 4.4, page 66 Proposed Change

As written, the current draft of the section on Rural Towns seems to place more emphasis on such places in terms of amenity and public realm rather than sources of economic opportunity. There are numerous examples across the Atlantic Economic Corridor of how unique factors and sources of competitive advantage have been developed to generate local, regional and national economic benefits. Take, for example two towns, Killybegs and Foynes at opposite ends of the Atlantic Corridor. Both illustrate how distinct local advantages (access to deep sea fishing waters and access to deep water close to flat land) can be used to generate complementary economic advantage from our marine resources.

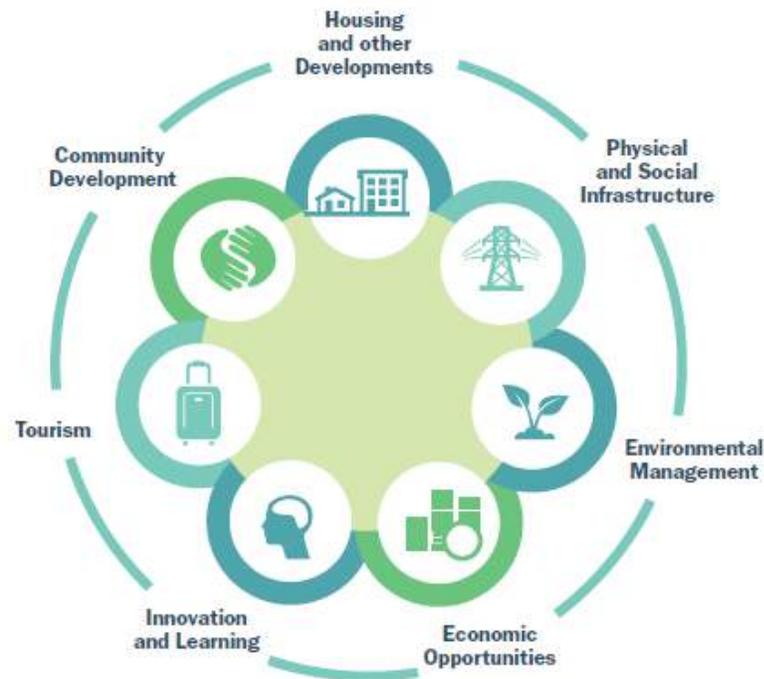
A change in emphasis is required in the current draft. One approach would be to reword current policy objective 17a to include the following:

Identify important or unique factors in rural towns and villages and use these as a source of comparative advantage for attraction of visitors, job creation and population growth.

2. Proposed Changes to NPF Draft to Deal with AEC Key Points

Chapter 7, pages 98 to 107 Current Draft

Figure 7.1 | Shared Planning Challenges in Ireland and Northern Ireland



Chapter 7, pages 98 to 107 Proposed Change

All of chapter 7 is very positively dedicated to vision, policy and objectives concerning cross border co-operation, particularly between Ireland and Northern Ireland. There are extensive and detailed write-ups on the potential to develop the Dublin Belfast economic corridor (e.g. Section 7.3, page 102) and how linkage and co-operation between ports and airports in the corridor offers potential for growth.

This chapter serves as a very good template for a critical chapter that is missing from the current draft NPF: **Working to Develop Regional Linkage and Co-operation.**

As stated in the introduction to this AEC document, reinforcing linkage across administrative boundaries is critical to success of the NPF. If we are to avoid replicating in other cities the mistakes of concentrating decades of our country's growth in Dublin we must ensure that the NPF's proposed smart growth centres are actively engaged in the kind of co-operation and actions that will not just build on their strengths but also connect and reinforce their links to one another and their surrounding areas.

It is essential that either: a) Chapter 7 is developed to provide for inter-regional co-operation with detailed policy commentary on the Atlantic Economic Corridor; or b) that a new chapter is added to the NPF to describe the need for inter-regional linkage and co-operation and to explicitly state that the Atlantic Economic Corridor is both a key policy goal and outcome required for success of the Vision for Ireland 2040.

2. Proposed Changes to NPF Draft to Deal with AEC Key Points

Section 9.1, page 123 Current Draft

Implementing the Ireland 2040 Framework will be guided by targeting the following national strategic outcomes:

- **Compact, Smart Growth:** Carefully managing the sustainable growth of compact cities and towns adds value and should create more attractive places for people to live and work in. All our cities and many rural towns contain large potential development areas, centrally located and frequently publicly owned, that are suitable and capable of re-use to provide housing, jobs, amenities and services, but which need a streamlined and co-ordinated approach to their development, with investment in enabling infrastructure and supporting amenities, to realise their potential. Activating these strategic areas and achieving effective density and consolidation, rather than more sprawl of urban development is a top priority.
- **Enhanced Regional Accessibility:** Once the core areas in key cities and urban areas have been mobilised, the next priority is to enhance accessibility between key urban centres of population and their regions such as the key cities of Cork and Limerick and through the Atlantic Economic Corridor to Galway as well as access to the larger urban centres in the North-West. Investment in connectivity first without urban consolidation measures will likely worsen the current trends towards sprawl.

Section 9.1, page 123 Proposed Change

A number of submissions to the NPF process and the draft NPF itself make reference to Polycentricity. According to [ESPON](#):

“Polycentric development is not about cities making massive investments in order to grow bigger. Instead it is about building linkages and joining forces with neighbouring cities and towns in order to “borrow” size and quality, to ensure positive spill-over effects for the development of wider regions.”

The current draft of the NPF recognises the importance of compact, smart growth and accessibility in and between cities but not the co-operation and linkage that serves as a critical third factor for success. A number of other outcomes are also documented but these two bring AEC concerns into focus. Firstly, enhanced regional accessibility should not have to wait for mobilisation of core areas as accessibility is an enabler of this goal. Secondly, there is also a critical missing outcome that should be added:

- **Regional Linkage:** If we are to avoid replicating in other cities the mistakes of concentrating decades of our country’s growth in Dublin we must ensure that these smart growth centres are actively engaged in the kind of co-operation and actions that will not just build on their strengths but also connect and reinforce their links to one another and their surrounding areas.

Note: A number of submissions to the NPF process and the draft NPF itself make reference to Polycentricity. For further details see <https://www.espon.eu/topics-policy/policies/between-cooperation-and-competition-why-polycentric-development-matters>

2. Proposed Changes to NPF Draft to Deal with AEC Key Points

Section 9.2, page 126 Current Draft

Metropolitan Areas: Building Centres of Scale

The enhanced development of Ireland's five cities is fundamental to the Ireland 2040 Framework, requiring a strongly co-ordinated focus within the metropolitan functional areas on a range of key issues.

Current city and county development plans consider the specific requirements of the relevant local authorities over a six year period. All five cities incorporate more than one local authority area, with the metropolitan area of Dublin covering all or part of the area of seven local authorities.

The multiplicity of plans addressing the individual and specific requirements of local authorities makes co-ordination of strategic development challenging. While the three Regional Spatial and Economic Strategies (RSES) will be developed to co-ordinate local authority plans at a strategic and regional assembly level, the area of the Assemblies is arguably too broad to be able to sufficiently focus on city and metropolitan issues.

Accordingly, in tandem with and as part of the RSES process, arrangements will be put in place to enable the preparation of five co-ordinated metropolitan area strategic plans (MASPs) for the Dublin, Cork, Limerick, Galway and Waterford Metropolitan areas³². In line with the RSESs, the MASPs will be provided with statutory underpinning to act as twelve-year strategic planning and investment frameworks for the city



Cork City



Dublin City



Section 9.2, page 126 Proposed Change

The use of statutory instruments to underpin the NPF is a positive development and will be reflected in the development of Regional Spatial and Economic Strategies (RSES) and metropolitan area strategic plans (MASPs) for the Dublin, Cork, Limerick, Galway and Waterford Metropolitan areas.

It should be a key requirement that RSESs and MASPs demonstrate how their delivery will contribute to the realisation and development of potential in the Atlantic Corridor.

Note: A number of submissions to the NPF process and the draft NPF itself make reference to Polycentricity. For further details see <https://www.espon.eu/topics-policy/policies/between-cooperation-and-competition-why-polycentric-development-matters>

2. Proposed Changes to NPF Draft to Deal with AEC Key Points

Section 9.3, page 130 Current Draft

9.3 Ireland 2040 and the National Investment Plan

Ireland 2040 will strongly inform strategic national investment, including in infrastructure. Government recognises that infrastructure provision is both influenced by and influences spatial development. Infrastructure can be provided in areas where demand already exists or is predicted to increase. Alternatively infrastructure can also be provided in strategic areas in order to encourage development but in general, the higher the density of the population in an area, the easier it is to spread the fixed costs of an infrastructure project and to ensure that delivery of infrastructure is viable.

A ten-year National Investment Plan for 2018-2027 will support the implementation of Ireland 2040 and the National Strategic Outcomes highlighted.

Section 9.3, page 130 Proposed Change

It is correct and makes sense that the forthcoming National Investment Plan should be aligned with the NPF.

The opening paragraph of section 9.3 recognises the fact that infrastructure provision is both influenced by and influences spatial development. But this commentary also seems to introduce a caveat to the concept of introducing infrastructure in strategic areas in order to encourage development by stating that it may be difficult to recover costs in less dense areas. It is essential that this caveat is not adopted as a guiding principle in decision making on the National Investment Plan.

The NPF must set out the long term vision for the kind of Ireland we want by 2040 including the role that that Atlantic Corridor can play in achieving this vision. The role of the National Investment Plan must be to enable the delivery of the infrastructure and capital required for success. There is no room for caveats.

Note: A number of submissions to the NPF process and the draft NPF itself make reference to Polycentricity. For further details see <https://www.espon.eu/topics-policy/policies/between-cooperation-and-competition-why-polycentric-development-matters>

END