



Planning a Better Future: It's Everyone's Business!



**Ibec submission to the public consultation on
Ireland 2040, the draft National Planning
Framework!**

Contents	
Key recommendations	3
Demographic projections should be more ambitious	5
The projections are too conservative	5
Better balance growth projections between Dublin and the regions	5
Conservative population projections will undermine the NPFs objectives	5
Address sprawl and congestion	5
The need for an evolving density strategy.....	5
Don't limit our ambition to be accommodating	6
Fully utilise the space available	6
State-led land development must be strategic.....	6
Greater vision needed on delivering a connected and networked Ireland	6
Reduce travel times across the country	7
An intermodal approach to inter-urban connectivity is required	7
Cities must be mobile as well as agile	8
Continue to build on Ireland's international connectivity.....	8
Connect our regions to the digital economy.....	8
Ensure deliverability of the national strategic outcomes	8
Critical Infrastructure for regional growth.....	8
Make progress on the decarbonisation pathway.....	9
Support investment in water services required for social and economic development.....	9
The NPF must articulate human capital strategic outcomes	10
Address the challenge of delivering policy coherence across government	10
Ensure policy alignment with the NPF.....	10
Clarify NPF's interaction with maritime spatial planning and foreshore planning	11
An enterprising approach to regional development	11
The NPF must have an effective capacity to respond to Brexit	11
Metro Growth, an opportunity for cities and city-led growth	12
Re-imagine our cities	12
Make living easier.....	12
Improve quality of life to underpin investment	12
Pay special consideration to towns and urban areas across the country.....	13
Maintain all-island co-operation	13
Plan for increased joint infrastructure provision	13
Recognise cross-border economies.....	13

Getting the governance and implementation arrangements right.....	14
A planning system that works	14
The NPF must embrace a culture of ongoing evaluation.....	14
Ensure measures do not limit our potential for growth.....	14
Effective guidance for regional development.....	15
Ensure synchronisation of local development plans with the NPF	15
Planning for growth in our five metro areas.....	15
Specific regional concerns.....	16
Ibec Midlands REC	16
Ibec North West REC	18

Key recommendations

Demographic projections should be more ambitious	
1.	Plan for effective growth, not business as usual between 2018 and 2040. A high growth and more realistic scenario would see the population grow by almost 1.7 million by 2040.
2.	Projections in the current draft should be the absolute minimum expected growth over the period. If not adjusted, the NPF's stated objectives in guiding population distribution, service provision and infrastructure investment will be severely undermined by an all too conservative demographic outlook.
3.	Achieve a better balance of projected growth across the country, more heavily weighted towards the regional cities and large towns without any absolute reduction in the projected increase for Dublin. All city regions must be allowed to their fullest potential.
4.	NPF performance reviews should be timed to coincide with census data, better informing national, regional, metropolitan and local strategies.
Address urban sprawl and congestion	
5.	Allow an evolving density strategy for our cities. Compact cities are more successful in concentrating productivity, innovation and creativity. Increased density is crucial to Ireland's economic future.
6.	The NPF should encourage development of a <i>Tall Buildings Strategy</i> to increase the height and density of Ireland's five cities in a manageable way.
7.	Consider more ambitious targets for urban/brownfield infill (e.g. 70% or higher in some metropolitan areas) to assist in the vision for more compact, less congested city regions.
8.	An active land management strategy must fully support the objectives of compact, smart growth through urban infill and strongly discourage dispersed development
9.	State-led land development must be strategic and focus on land and asset holdings that could be put into more productive use. Semi-state companies should retain autonomy over their land holdings.
Greater vision needed on delivering a connected and networked Ireland	
10.	Extend the targeted inter-urban speed of 90kph between cities to include urban centres of scale to reduce journey times and enhance regional accessibility through an upgraded motorway network.
11.	Target congestion within cities caused by inadequate intra-urban public transport system, overall poor spatial planning and urban sprawl. Measure peak and off-peak intra-urban travel times.
12.	Inter-urban connectivity must occur in tandem with intra-urban transport plans. Failing to connect our cities and urban centres will restrict their growth and prevents an effective counterweight to Dublin.
13.	Support an integrated plan for inter-urban connectivity through an inter-modal approach to transport planning such as establishing a long-term vision for Ireland's rail network.
14.	Require metropolitan areas to assess the public transport requirements over the next 20 years to ensure current and future provision best reflects their individual needs.
15.	Recognise our ports and airports are assets of strategic national infrastructure providing high quality international connectivity and accessibility in all applicable regional, metropolitan and local plans.
16.	Encourage continued investment in broadband, underpinning infrastructure and support deployment of technological developments; allow all regions to take full advantage of the digital economy.
The Midlands and North West regions must not be statutorily disadvantaged	
17.	The NPF must identify Athlone, Sligo and Letterkenny-Derry as urban centres of scale because there are no cities or urban centres of scale north of the Galway-Dublin line.
18.	Provide regional coherence and address peripherality by prioritising of and directing necessary funding in essential infrastructure provision to underpin economic growth and performance.
Ensure deliverability of the national strategic outcomes	
19.	Overhaul the planning system to support delivery of critical infrastructure and regional growth targets. Streamline statutory timelines for planning decisions and ensure they are enforced.
20.	Prioritise the decarbonisation agenda throughout the spatial planning system. Policies and local authorities must support our transition to a low carbon and environmentally sustainable economy.
21.	Integrate national water infrastructure planning and investment strategies with the NPF. Sustainable water management is acknowledgement of our natural capital and should be supported.
22.	Articulate human capital strategic outcomes, which includes a strong focus on higher education and R&D across all regions. Innovation and skills are essential to boosting regional productivity.

Address the challenge of delivering policy coherence across government	
23.	Establish a whole-of-government coherent and consistent approach to effective regional development. The NPF website should be a central repository for all related policies
24.	Ensure a high degree of interaction with the forthcoming maritime spatial plan and provide clarity relationship between foreshore planning and land use planning.
25.	Place-making, clusters and smart specialisation must be core components of each regional, metropolitan and local development plans.
26.	Government must be allowed to alter the NPF and related plans immediately, not having to wait until the first NPF review, in direct response to Brexit, whilst ensuring long-term policy certainty.
Metro Growth, an opportunity for cities and city-led growth	
27.	Reimagine our city regions by preparing blueprint for their long-term development. They must be adaptable and capable of responding to rising urbanisation, new technologies, service patterns and innovations over the next two decades.
28.	Recognise the impact of expected demographic changes will have on our cities' housing stock and mix required by 2040. Adopt a holistic housing view and remove barriers to sustainable housing delivery.
29.	Improve the liveability of our cities, making them amongst the most liveable in the world. Performance can be measured against globally recognised quality of life indexes.
30.	Pay special consideration to the urban areas across the country. Performance by some urban centres are likely to outpace expectations due to improved connectivity and the effects of agglomeration.
Maintain all-island co-operation	
31.	An all-island approach to spatial planning requires long-term coordination of infrastructure planning and delivery. We must plan for an island of 10 million people by mid-century.
32.	Recognise the special status of cross-border functional economic areas. Territorial cohesion must not be undermined by Brexit; Derry-Letterkenny and Dundalk-Newry are regional drivers of growth.
Getting the governance and implementation arrangements right	
33.	Clarity is required on the statutory nature of the NPF and how it will be enforced on the ground in actively promoting economic and sustainable development. This includes clarification on the precise role the Office for Planning Regulation overseeing implementation.
34.	Review the NPF at five-year intervals, against performance metrics and a transparent evidence base. The second review should comprehensively inform the next set of regional and metropolitan plans and capital investment priorities.
35.	Regional assemblies should be given all resources, data and information necessary to prepare Regional Spatial and Economic Strategies (RSEs) and allow for consultation.
36.	Greater synchronisation between the RSEs and local development plans must occur.
37.	Provide clarity on the timelines and responsibilities for developing the Metropolitan Area Strategic Plans and how they interact with the RSEs and local plans. Agree without delay the metropolitan boundaries for Waterford, Limerick and Galway so they can be incorporated into the forthcoming RSEs.

Demographic projections should be more ambitious

Ireland's economy is growing quickly; our young and well-educated population continues to expand and we have witnessed the return of net inward migration. We are now at the end of a decade that has seen a population increase of over 400,000 people, which was 58,000 people (50%) higher than even the most optimistic scenario in our last national population projections in 2011. Our ability to respond to current and future capacity pressures is the single biggest threat to our competitiveness and economic wellbeing.

The projections are too conservative

The national population projections in *Ireland 2040*, the draft National Planning Framework (NPF) are too conservative. The population is projected to grow by just 1.0 million between 2016 and 2040. This would be consistent with a M1 scenario in which net immigration as a proportion of population would average less than 0.2% of population over the forecast period. Such a low rate over an extended period has not been seen since the 1970s.

Population projections in the draft NPF are not satisfactory for a country with Ireland's economic potential and demographics. It must account for a more realistic future scenario. Using a more optimistic migration scenario would see the population grow by almost 1.7 million over the period. The recent ESRI report on future health needs stated that a population increase of 1.1 million by 2030 is likely. The NPF must allow for a high growth scenario. The projections in the current draft should be the minimum expected growth over the period because after all we are planning for effective growth, not business as usual.

Better balance growth projections between Dublin and the regions

The higher growth scenario, outlined above, should be reflected in a redistribution of growth between Dublin and the regions. Population and jobs growth could be more heavily weighted towards the regional cities and large towns without any absolute reduction in the projected increase for Dublin. Given the fact there is no designated major urban centre in the north west or the midlands, the NPF should include a vision for sustainable urban centres north of the Galway-Dublin line. These centres will act as a driver of population and employment in the north of the country, complementing the planned improved transport links.

Conservative population projections will undermine the NPFs objectives

The implications of being too conservative with the national population forecasts should not be underestimated. The cumulative difference (0.7 million persons) equates to nearly eight times the present population of Limerick city. The National Investment Plan 2018-27 and subsequent capital investment plan(s) will need to provide for the associated growth of demand for services such as regional hospitals, third level institutions, cultural and sporting institutions. A recurrence of the current housing shortage, at a local or regional level, is more likely using conservative assumptions. Instead, planned five-yearly reviews of the NPF must account for evolving demographic statistics published under the most current census at the time.

Address sprawl and congestion

The recent history of Ireland's spatial development has been characterised by disconnected development. The NPF is a chance to replace disconnected development with connected space. Urban sprawl is an unsustainable development pattern and is a symptom of a planning system which has previously failed to effectively adopt best spatial planning practice. There is now an opportunity not just to promote a more compact approach to development, but also to prevent repeating past mistakes.

The need for an evolving density strategy

Ireland's cities have not been ambitious enough in their use of space. Transport infrastructure, the cost of living, sustainability, and the built environment are all effected by how well space is utilised and they play a role in determining the quality of life. Globally, the past 50 years has been a period favouring suburbanization and urban sprawl. More recently the trend has been reversed. There is a return to focusing on the city core as the focal point for growth. This has been some acknowledgement of this in the draft NPF. For example, Limerick's Georgian quarter has been earmarked for higher density. Cities concentrate productivity, innovation and creativity. Higher density cities are more successful across these areas. Therefore, increased density is

Building a better future: it's everyone's future

crucial to Ireland's economic future. It can enrich character, place and identity which boosts attractiveness and overall competitiveness.

Don't limit our ambition to be accommodating

A sensible approach to urban building height limits will play a significant role in housing Ireland's rapidly expanding population. Our cities are also well positioned to attract a new wave of investment and jobs, especially in the post-Brexit era. A focus on height will allow us to address the problems of urban sprawl, housing and commercial space shortages and improved densification.

Ireland has long needed an effective approach to tall buildings, which would address the problems of urban sprawl, housing and commercial space shortages and it would encourage densification. A *Tall Buildings Strategy* would increase the height and density of Ireland's five cities in a manageable and sensible way. Taller buildings can make a beneficial contribution, besides accommodation, to urban regeneration and to their surrounding streetscape and skyline. The right composition of high, medium, and low-rise development can greatly improve density and the quality of life at the same time. Alongside a suitable housing composition, green spaces should be incorporated into the built environment as part of green infrastructure – from parks to boulevards, communal areas, right down to terraces and balconies.

Fully utilise the space available

The targets for brownfield infill should be more ambitious than the figures currently proposed. Subject to local assessments of environmental impact and flood risk, it may be feasible to achieve 70% or higher within some metropolitan areas without loss of high-amenity green spaces. It will also help to alleviate congestion. Major investment in public transport will be needed to prevent gridlock as the population continues to grow.

Brownfield development can have a beneficial impact on business competitiveness. Dispersed development, on the other hand, is generally much costlier than compact development where the provision of utility infrastructure is concerned. The Exchequer may invest in rural services (e.g. National Broadband Plan) in anticipation of long term demand growth. However, in general it is difficult for regulated network utilities that are funded through user charges to do likewise. A key regulatory principle is that only efficiently-incurred investment costs should be recoverable. Ireland's active land management strategy ranging from national through to local implementation must fully support the objectives of compact, smart growth through urban infill.

State-led land development must be strategic

The draft NPF recognises the potential to use State lands for strategic purposes. This includes consideration of establishing a national land development agency to support urban regeneration. It is important that future land designated for development does not undermine the future development and provision of infrastructure by our semi-state companies. Provisions established under the NPF must not remove their autonomy and flexibility in self-assessing land holdings that are strategic and those identified by them for redevelopment in their respective strategic plans. These companies have spearheaded recent developments across Irish cities, either through sale or long-term leases. Lands being held in reserve for valid strategic purposes may be leased out but they should not be divested. Instead, focus should be placed on freeing up land and asset holdings held by local authorities, Government bodies and agencies to be put into more productive use. The public sector should adopt the approach of the commercial semi-states in strategic land management.

Greater vision needed on delivering a connected and networked Ireland

It is time to bring people and economic activity closer together. Our transport infrastructure is not joined up, the motorway and rail networks need to better connect our cities and urban areas. We must allow people and goods to move around our cities (intra-urban) and the country (inter-urban) seamlessly and quickly. International connectivity (marine and aviation) needs to be consistently improved, expanding tourism and trading opportunities globally. For example, with increased strong growth in frequencies and services at our airports. Finally, we must allow people and businesses across the country to take full advantage of the opportunities offered by the digital economy.

Reduce travel times across the country

Commuting, mobility and accessibility impact on our quality of life. Improved connectivity, reduced congestion, integration of the public transport network and increased modal shift (e.g. public transport) and modal choice all contribute to local, regional and national economic development. As a measure of enhancing regional accessibility, the draft NPF targets an improvement in average journey times between our cities. This is to be achieved through an indicative inter-urban speed of 90kph. This should be extended to include urban centres of scale. A more ambitious approach to the motorway network across the country would allow this target to be achieved and exceeded with the added benefit of providing much improved access to the North West.

The draft NPF states that it is a “reasonable target” for the majority of people to have no more than a 30-minute commute to work and for most premises to be able to access a port or airport within 90 minutes. Average commuting time for the State is currently 28 minutes thus devaluing the stated target for travelling to work. However, this fails to capture the extreme cases. For instance, in Wicklow, Meath and Kildare the commute for 1 in 5 people is longer than an hour. In other counties this share is less than 5% of the working population. Congestion and excessive commuting times are a symptom of an inadequate intra-urban public transport system, overall poor spatial planning and urban sprawl. Whilst increased density will alleviate the problem in the longer term, commuting times and measures to reduce them must be given specific regional and metropolitan focus in their related plans. Intra-urban travel times should be measured to distinguish between peak and off-peak times.

An intermodal approach to inter-urban connectivity is required

Ireland does not have an intermodal approach to transport planning. Individual transport plans are developed individually and cover short-to-medium timespan. The draft NPF puts consolidated growth in the cities ahead of enhancement to intra-urban connectivity is enhanced. This is not satisfactory and does not recognise the economic and social imperative benefits derived from an inter-connected island. It is inconsistent with the stated objective of reducing travel times across the country and is likely to restrict growth of our cities. Intermodal connectivity as well as focused investment in inner city services are symbiotic and should happen in parallel.

The NPF is an opportunity to provide a vision for Ireland’s transport network, with a particular focus on inter-urban connectivity, out to 2040 and beyond. During the period up to 2008, there was considerable investment in road transport connections between the capital and most of the regions. However, the motorway network was never completed and the regional cities themselves remain poorly connected to each other. This makes it more difficult for them collectively to provide an effective counterweight to Dublin.

Ireland’s motorway network must better connect our cities. Projects like the M20 will significantly advance growth in both the Cork and Limerick city regions. The Atlantic Corridor project should be advanced through a mixture of motorway and dual carriage-way, which could be upgraded in the future according to increased demand. Better leveraging of our existing road infrastructure in addition to new projects would dramatically improve accessibility across the country. For example, Ibec advocates a high-capacity north-south arterial route through the Midlands connecting the main national primary routes. It is also necessary to start planning for an outer orbital road for the capital, which will eventually relieve the M50 of traffic journeys that do not start or finish within the city.

Successfully addressing inter-urban connectivity requires a focus on other modes of transport other than roads. Unfortunately, the draft NPF lacks detail regarding future rail infrastructure. There are references to future investment in high capacity rail connecting Belfast, Dublin and Cork. However, the NPF should include a long-term vision for the Ireland’s rail network, including the potential enhancement of freight capacity. We understand that the forthcoming publication of the Rail Review will have a much shorter time horizon than the NPF. This is in addition to plans for rail investment within Dublin, which have already been determined by the Transport Strategy for the Greater Dublin Area.

Cities must be mobile as well as agile

Connectivity and ease of mobility are linked to the performance of cities. People should be able to move within city regions easily and efficiently. High quality public transport infrastructure and minimal congestion contribute to a reduction in intra-urban travel times. Specific investment projects should be identified that would allow for sustainable growth across our city regions, for example the Limerick distributor road is critical to the development of the city.

Improving the connectivity and tackling congestion, increases the catchment area for skills, economic and social activity within a city region. Better connectivity reduces the need to depend on cars as the primary means of transport. This will reduce emissions and improves air quality in a city. The draft NPF should encourage each metropolitan area to assess the public transport requirements over the next 20 years to ensure current and future provision best reflects their individual needs.

Continue to build on Ireland's international connectivity

As a trade-intensive island at the edge of Europe, Ireland is heavily reliant on international connectivity provided by our aviation and marine transport infrastructure. They play an essential role in our economic prosperity, especially trade and tourism. The draft NPF duly acknowledges the vital role of our ports and airports for high quality international connectivity. A balance may be required between existing government policies and the desired goal of effective international connectivity and accessibility for all regions. Policy consistency with the NPF must be established in the long-term.

Our ports and airports must be appropriately recognised in the NPF as assets of strategic national infrastructure. This must be duly recognised in all applicable regional, metropolitan and local plans. It is vital that development is preserved for the primary purpose of facilitating Ireland's international connectivity. Proper spatial planning must facilitate, not restrict, the future development of our ports and airports. The NPF should specify that operators of these strategic infrastructure assets should maintain full autonomy over asset management decisions.

Connect our regions to the digital economy

The expanding digital economy plays an increasingly crucial role in the exchange of goods and services. Insufficient broadband connectivity leaves local businesses and householders at a significant disadvantage. The opportunities the digitalisation offers cut across sectors and play to the strengths of both urban and rural areas. Currently, some 65% of Irish premises either can or have access to high speed broadband (30Mbps or greater) from commercial operators with a further 12% to have connectivity by late 2018.

Digitalisation of the economy changes the point of interaction with the built environment and must be incorporated into spatial thinking. For example, data intensive industries provide vital boosts in job creation across the country. Online trading and mobile working can change the landscape of the requirements for certain categories of retail and office space. The NPF must encourage continual investment in broadband (e.g. National Broadband Plan) and underpinning infrastructure (e.g. data centres). Technology evolves at a considerable rate and the NPF must enable such deployments (e.g. 5G and beyond) over its lifetime.

Ensure deliverability of the national strategic outcomes

The NPF will set out national strategic outcomes to inform the National Investment Plan 2018-2027 and subsequent plan(s). These will inform strategic prioritisation and project selection over the next 20 years. It is important that our planning for capital projects are coherent with the NPF objectives and embed regional resilience by improving all regions as places to live, work and invest.

Critical Infrastructure for regional growth

The National Investment Plan 2018-2027 must include an explicit list of projects with expected timeframes, prioritised according to objective and transparent principles. However, we must be able to finance and deliver key projects on time. The NPF supports the desire for Ireland to be an attractive place to live, do business, create jobs and invest. Our planning system needs to support this. Several high-profile planning applications have highlighted that elements of our planning system in its current form is dysfunctional and can be too easily exploited.

A particular issue is that of statutory timelines for planning. It is too often the case, however, that these timelines are ignored. Stricter enforcement of statutory timelines for decision making needs to be adopted. In addition, there is an opportunity to now examine some of the timelines related to planning appeals, in particular whether the 8 week timeframe after a decision notice is posted to call for a judicial review is required. If our timelines for planning are not shortened, we may lose out on vital investment and job creation, which is even more pertinent when considering regional development.

In addition, our third-party appeal system is designed to protect people from poor planning decisions, however all too often it is used and abused as a mechanism simply to delay projects from commencing. Unfortunately, high profile appeal cases amplify the perception that Ireland is a difficult place to do business. There are plenty of examples of both public and private projects right across the country being derailed due to inbuilt flaws in the planning system. In summary, our planning system needs to be overhauled to support the delivery of the vision identified in the NPF. If this is not changed, it is ultimately the economy and society that will lose out.

Make progress on the decarbonisation pathway

The theme of Irish energy policy over the next twenty years will be one of transition as the country follows through on its international commitments and targets the delivery of a low carbon, climate resilient, and environmentally sustainable economy. This includes an 80%-90% reduction in greenhouse gas emissions compared to 1990 levels by 2050. Meeting these objectives in the context of a growing economy and an increasing population while also addressing concerns around energy security and affordability will be one of the greatest challenges of our time. Appropriate focus must be provided by the NPF so they can be adequately incorporated into regional, metropolitan and local spatial plans.

The NPF must place greater emphasis on the decarbonisation agenda. Many infrastructure and development decisions are effective over several decades and hence decisions in the 2020s could affect Ireland's emissions profile in 2050. The NPF will need to facilitate the incorporation of long term emissions considerations in planning and infrastructure decisions. Greater investment in our electricity infrastructure, including greater grid interconnection, will be needed to support the electrification of heat and transport.

Given its relatively low greenhouse gas and particulates emissions profile, gas will play an important role in the transition to a low carbon economy. Leveraging the gas network and existing gas-fired generation and heating infrastructure allows Ireland to efficiently make progress on the decarbonisation agenda. Ireland should also realise the full potential of supplementing the network with bio-methane and compressed natural gas in meeting its renewable heat and transport targets.

Finally, planning policies must support, rather than undermine, the development of clean energy. Commitment to sustainable energy transition must allow this happen. Barriers to delivering on such objectives must be removed. For instance, proposed new national planning guidelines for wind energy projects have the potential to sterilize large tracts of land that could contribute towards our decarbonisation and renewables targets. This is not to mention the ability of local authorities to frustrate the delivery of vital infrastructure (e.g. development contributions, commercial rates etc).

Support investment in water services required for social and economic development

Ireland requires a reliable and secure water supply and service. The draft NPF recognises the environmental, social and economic benefits of improved water quality. Much of the current infrastructure inherited by Irish Water does not meet EU quality standards, largely due to decades of under-investment. Low water pressure, leakage from supply and sewage systems, frequent interruptions combined with problems due to flooding and drought can all have a negative impact on business. The NPF reflects a distinct opportunity to integrate national water infrastructure planning with a plan being out on statutory footing.

The NPF directly and through the myriad of regional, local and metropolitan plans must encourage strong interaction and alignment with the Irish Water Investment Plan and subsequent iterations. While not part of the NPF process, we must acknowledge the current funding model for the national water utility leaves considerable uncertainty over essential capital projects post-2020. This must be rectified in order to support the achievement of the strategic objectives set out in the NPF. For example, the five city regions identified require significant investment in new or upgraded water and wastewater infrastructure in order to effectively support their growth targets. Sustainable water management is acknowledgement of our natural capital and should be supported. The NPF must be aligned with the forthcoming River Basin Management Plan 2018-2021 and subsequent plans prepared under the Water Framework Directive.

The NPF must articulate human capital strategic outcomes

The draft NPF acknowledges the importance of education and lifelong learning to sustaining economic success and building strong communities. Overall it fails, however, to define how human capital development will fit into the overarching framework that will inform the strategic investments needed to realise the potential for regional growth. This represents a significant and worrying departure from the initial NPF consultation document, which recognised that *“infrastructure is a necessary but not alone a sufficient condition for growth” but “its impact increases where investments in human capital and innovation are present, hence the need for integrated policies”*.

Education and lifelong learning are highlighted in just one of over 70 national policy objectives. Research and development is not referenced. While the Draft Plan acknowledges the potential of technological universities, the lack of attention to regional R&D, and indeed enterprise policy more generally, is concerning. A coherent planning framework could encourage high level interactions between research organisations, public bodies, business and education institutions to cluster and network to become more engaged in the social-economic development of their region. Innovation is essential to boosting regional productivity.

In terms of national strategic outcomes, education is largely framed as a demographic or quality of life issue. While the DIT Grangegorman campus and a new science and innovation park in Cork are mentioned specifically, the key enabler for the urban centres is limited to a general aspiration of *‘continued expansion of and integration with the City’s third level institutions’*. The draft NPF fails to recognise that the creation of high-skilled jobs can have a strong ‘local multiplier’ effect on job creation while the ‘drag’ on regional economic growth of large numbers of low-skilled workers can be significant. There are striking regional disparities in skills attainment within Ireland which should be addressed through an integrated regional planning and enterprise development framework. The Expert Group on the Future of Higher Education Funding identified a capital investment requirement of €5.5 billion over the next 15 years to cater for increased student numbers, capital upgrades, health and safety issues, equipment renewal and ongoing maintenance. A coherent planning framework for medium term is required to ensure the most effective use of additional resources.

The NPF must articulate a set of Human Capital Strategic Outcomes that:

- Acknowledge the differences in regional skills profiles and outline how regional workforce planning will be integrated in the Framework and the National Investment Plan
- Provides a framework for the development of a coherent strategy (including the use of PPPs) for capital investment in higher and further education
- Describes the intended linkages between skills supply, innovation, enterprise strategy (including smart specialisation and clustering policies) and the planning framework

Address the challenge of delivering policy coherence across government

Whilst Ireland’s public administration system is the most centralised in the OECD, government departments develop policy independently rather than with the buy-in from other departments. There are of course exceptions such as sectoral strategies (e.g. Food Wise 2025), action plans and guidelines. The NPF faces the challenge of establishing coherence across the whole of government on place-making and regional economic development.

Ensure policy alignment with the NPF

Implementing the NPF should be viewed as a welcome opportunity to take stock of existing government policies from the viewpoint of their impact on planning and regional economic development. It is important that government policies and strategies, where applicable, are consistent with the NPF and vice versa. The NPF should have a clear, transparent reference site detailing all relevant strategies and guidelines currently in place that would complement implementation of the plan. As new guidelines are developed, they should be published on this reference site.

Clarify NPF's interaction with maritime spatial planning and foreshore planning

Ireland is participating in the world's first legal requirement for a 'planning-at-sea' system established by the EU. We are required to prepare a dedicated Maritime Spatial Plan (MSP), distinct from the NPF, by 2021. The challenge will be to balance the different demands for using the sea including the need to protect the marine environment and ensuring that these activities are as efficient and sustainable as possible. Our planning system must account for the different uses of maritime space, including potential conflicts arising from different uses, and taking into consideration long-term changes due to climate change.

Ireland's marine area is the largest in Europe totalling over 488,000 square kilometers. The development of the maritime spatial plan represents a unique opportunity for Ireland, to effectively plan our waters in both a sustainable and economically advantageous way, making the best use of our natural resource. This will build on objectives of the existing non-spatial Harnessing Our Ocean Wealth strategy.

The MSP will be developed after the finalisation of the NPF but it too will be put on a statutory footing. A high degree of interaction between these two spatial plans must occur. In addition to this, the relationship between foreshore planning and land use planning is uncertain. The NPF must provide clarity and certainty as to the hierarchy and extent or roles of these plans and how they will in practice interact with each other as they are developed and implemented.

An enterprising approach to regional development

Place-making, addressing strengths and weaknesses of each region, and smart specialisation are core components of Ireland 2025, the national enterprise strategy. Our enterprise agencies such as IDA Ireland, Enterprise Ireland, Science Foundation Ireland and Údarás na Gaeltachta have ambitious regional targets and goals. These are supported by each local authority through the local enterprise office network. The Action Plan for Jobs process, including regional action plans, together with the regional skills fora and the Action Plan for Rural Development underpin smart specialisation strategies, sectoral ecosystems and regional development.

The NPF must be grounded in our current enterprise strategy. All regional, metropolitan and local development strategies must support enterprise growth across the country. Ultimately, the output of these plans must be an adequate supply of commercial and residential property, attractive areas to live, availability of skills and underpinned by required infrastructure. These will underpin each respective regional value proposition. The 20-year NPF must support the requirements of traditional and emerging business sectors (e.g. financial services, fintech, biopharma, medical technology, business services, engineering, internet of things, infrastructure etc) over its lifetime.

The NPF must have an effective capacity to respond to Brexit

Brexit has the potential to be effect transformational change on Ireland. Whilst there may be opportunities for some, the risk of our growth being derailed over the coming years is rising. Brexit negotiations are stuck, and the lack of progress increases the likelihood of a 'no deal' outcome. The NPF must support our overall response to Brexit challenges as and when they appear. We must acknowledge that some regions and sectors will be disproportionately impacted, especially those depending on cross-border economic integration and trade with Britain.

Trade, supply-chains and logistics will be disrupted. Ports and airports, for example, will have to respond accordingly and is something which may require appropriate policy support. Ireland's Single Electricity Market could be undermined by a UK withdrawal from the EU's Internal Energy Market (IEM), leaving us physically disconnected from the wider IEM. There is a general acceptance that managing the trade relationship between Ireland and Northern Ireland warrants unique solutions to avoid the need for a physical border. Yet, this requires clarity and may be deferred until a new UK-EU trading relationship is put in place.

The NPF's response cannot wait until its first statutory review. Five years is too long to wait. The NPF's governance arrangements may result in a similar amount of time being taken until local, regional and metropolitan plans are aligned accordingly with the Brexit response. Government must be allowed to alter the NPF and related plans immediately in direct response to Brexit, while recognising the overall need for long-term policy certainty.

Metro Growth, an opportunity for cities and city-led growth

Our economy relies heavily on the performance of our cities. Better functioning, sustainable and more vibrant cities will ensure economic growth and continued social advancement. We must plan accordingly. The competitiveness of our cities must be improved in terms of infrastructure, sustainability and the cost of doing business. Our growing population is also putting additional pressures on our cities, notably in housing. Efforts to improve the overall quality of life within our city regions must be stepped up over the lifetime of the NPF. However, prioritising our five cities does not mean our urban centres of scale are ignored.

Re-imagine our cities

It is a profound and transformative move to place Ireland's five city regions at the forefront national economic growth. Our cities are in a global race for investment, capital and talent. Ensuring that they are adaptable and capable of responding to rising urbanisation and the pressures it places on cities. They must be able to respond to the emergence, deployment and take-up of new technologies (e.g. electric vehicles, 5G roll-out, autonomous vehicles etc) and new innovations (e.g. shared economy, smart cities). Cities must build on their strengths while addressing their weaknesses; economic, social, cultural, and educational. They should also be coordinated to ensure Ireland has a network of cities that complement each other's development rather than compete. The NPF offers a real opportunity for a new development blueprint for our cities. The renewed focus on zoning and planning in the NPF offers a timely opportunity to re-examine the development of our cities.

Make living easier

Cities are not just places where people work. Ireland is currently experiencing significant pressure in the housing market. We must also recognise that urban planning necessitates building communities, not just housing. We need the right mix of housing in the right areas, in accordance with suitable and sustainable development practices. A change in culture in relation to housing preference must be championed to reflect changing demands in accommodation type and density. The draft NPF should recognise that expected demographic changes will impact the housing stock and mix required over the next two decades.

A holistic view of housing will also be required. It must allow for an appropriate mix of location, type, tenure and accommodation. Students, young professionals, families, and an older population all have different housing needs. The Irish housing market is not currently orientated to respond in either the rental or housing markets. Strategies to address social housing and student provision can make a significant contribution to resolving the current housing undersupply problem by their removal from the private rented sector. However, as an example, Dublin City Council recently placed new restrictions on purpose-built student accommodation. The NPF, through the regional, metropolitan and local development plans must prevent such derivations occurring.

There is currently a mismatch between what housing is suitable and what is available. This affects affordability of housing and ultimately a city's ability to attract or retain people. Government should remove unnecessary regulations preventing timely housing delivery, especially those inconsistent with other NPF objectives. For example, we welcome the proposed reduction in the provision of car park spaces in urban apartment developments. The NPF should encourage an ongoing review of regulations in terms of improving sustainable housing delivery for our city regions.

Improve quality of life to underpin investment

The focus on placemaking is a welcome development. It is a key pillar of Enterprise 2025, our national enterprise strategy. Improving the quality of life across our metropolitan areas will allow Ireland to become more competitive, resilient, and inclusive. Talent is mobile. It is not just businesses that invest in an area, people do too. Our cities must improve their liveability proposition. However, this is an area of underperformance in recent years. In 2010, for example, Dublin was ranked as the 26th most liveable city in the world. Today, Dublin is 34th. This demonstrates that little strategic headway was made by each of local development plans across Dublin's four local authorities. This must change. Our cities should strive to be amongst the most liveable in the world. Performance can be measured against globally recognised quality of life indexes.

Pay special consideration to towns and urban areas across the country

It is important that urban centres which fall outside metropolitan areas are not overlooked by the prioritisation of city regions as national drivers of growth. Some towns and their hinterlands (e.g. Drogheda, Dundalk etc) are greater in population than when some of our cities were granted city-status. The draft NPF lists 41 towns as large urban centres across the country. However, they are overly concentrated in Dublin, Cork and the rest of Leinster. To achieve effective regional development, we must place special focus on towns right across the country. Towns below 10,000 population should be assessed and if necessary, strategically targeted for interventions. Over the lifetime of the plan, some of these areas will benefit greatly from improved connectivity and the effects of agglomeration. Reviews of the NPF should identify and reward towns performing strongly.

Special focus will be required for the midlands and the north west because both regions lack a designated city. Three towns (Athlone, Sligo and Letterkenny) should be identified as urban centres of scale. This will require the region to be highly interconnected, both physically and digitally. Investment in transport and digital infrastructure would bring a significant productivity boost to the region; broadening the labour pool; allowing business to access a broader range of markets and suppliers; make it easier for firms to share ideas, people, and technology.

Maintain all-island co-operation

An all-island approach to spatial planning is welcomed. Local and regional economies function across both jurisdictions, creating an all island market across many sectors. Brexit creates uncertainty but this should not undermine territorial cohesion. Our ambition is for a fully connected all-island market that supports greater prosperity and employment through increased flows of people, goods, services, energy and investment.

Plan for increased joint infrastructure provision

Effective long-term co-ordination of infrastructure development between Ireland and Northern Ireland should be broadened and deepened. We must plan for an 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 – must be the key driver of infrastructure planning and development. Considerable portions of the country currently lack meaningful strategic connectivity. A truly comprehensive inter-urban motorway network would enhance the competitiveness and resilience of the region. The delivery of other key pieces of cross-border infrastructure by the North-South Infrastructure Group, such as the North-South Interconnector, will support the prosperity and competitiveness of all island market. We must seek to leverage investment in infrastructure that deliver economic and social objectives including communications infrastructure, environment and tourism.

Recognise cross-border economies

Cross border economic activity plays a large role in driving growth in both Ireland and Northern Ireland. Cities and local economies in Northern Ireland have a strong influence on the economies on this side of the border. The invisible nature of the border means that functional economies do not stop at national boundaries. A large number of border towns derive economic benefits by their proximity to city-regions of Derry/Londonderry and Belfast. There are also substantial economic links between Dundalk and Newry along the M1 corridor that benefit from economic agglomeration. To continue benefitting from these cross-border relationships and to increase their value, the NPF should recognise the special status of functional economies that are spread across the two jurisdictions. Particular recognition should be the Derry-Letterkenny city region as an important regional driver of growth, and the Dundalk-Newry economic zone and the role it plays along the Dublin-Belfast economic corridor.

Getting the governance and implementation arrangements right

The NPF's predecessor, the National Spatial Strategy, was undermined politically and poorly implemented. Putting the NPF on a statutory footing will move Ireland's planning system to a plan-based, rather than market-led, approach. It is vital that due attention is given to the mechanisms to ensure that the strategy is adopted, rolled-out and capable of evolving and not being undermined over its 22-year timeframe. Successful implementation is crucial to sustaining our economic and social progress as the country faces new up to new challenges. This requires a coherent and joined-up vision between the different levels of planning, implementation and monitoring.

A planning system that works

The planning system must seek to facilitate and not impede economic growth. This is essential to delivering key infrastructure projects required to meet the NPF's vision for Ireland in 2040. Through the NPF, there should be an inherent presumption in favour of sustainable development. An open, transparent and methodologically-competent planning system is also required. Greater regulatory oversight of the planning system would help to ensure that all future development and zoning decisions will be both plan-led and evidenced-based. Above all, Ireland's new planning system must be robust and fit-for-purpose, adopting international best practices.

An independent Office for Planning Regulation (OPR) is to be established under the Planning and Development (Amendment) Act 2016. The new planning regulator will be given specific responsibility for monitoring implementation of the NPF. It is important that clarity is provided over the level of scrutiny the OPR will be required to provide of the NPF and the various local, regional and metropolitan plans to be drawn up between 2018 and 2040. The OPR should be adequately resourced to carry out its statutory functions. Any evaluation or monitoring of the NPF conducted by Government or the OPR itself must inform its future functioning.

The NPF must embrace a culture of ongoing evaluation

A comprehensive review of the NPF should be conducted at a minimum of five-year intervals. Reviews should be scheduled to guide regional, metropolitan and local development plans to be prepared and to continually inform national capital expenditure programmes. Government and the Oireachtas should also be required to scrutinise legislation for consistency with the NPF and to monitor whether the NPF delivers on national priorities.

Ongoing performance monitoring metrics should be developed and put in place. We need to pay close attention on local and regional performance throughout the lifetime of the NPF to ensure the right conditions exist to allow the entire country to succeed. A dedicated portal should be established to allow people to monitor progress of the plan over its lifetime and to see its implementation right down to the local level.

Ensure measures do not limit our potential for growth

Clarity is required around the precise nature of NPF demographic projections and the implementation of related planning policy across the country. The NPF will be put on a statutory footing and must be accounted for in all regional, local and metropolitan spatial plans. However, significant areas across our cities have already been subject of zoning, including strategic development zone designations, but not yet developed. Some are sizeable such as Poolbeg West, Cherrywood and Clongriffin-Belmeyne. This raises the question of whether these developments already planned or underway will impact the demographic targets set out in the NPF.

Too rigid a reliance on conservative demographic projections could limit or sterilise further development if targets are hit. Regional and metropolitan strategies will take a 12-year timeframe but local development plans operate in 6-year cycles. Targets for rapidly growing cities could be exceeded by 2030. Metric projections (e.g. demographics, housing etc) must be capable of being reviewed so they don't hold back future growth. Concern is already being flagged by local authority planners over potentially refusing planning applications based on whether a development may exceed a forecasted target for a given area.

Effective guidance for regional development

Within six months of the NPF being approved, Ireland's 3 regional assemblies will have to prepare Regional Spatial and Economic Strategies (RSEs). Replacing the current Regional Planning Guidelines, the RSEs will coordinate the implementation of the NPF within their respective areas. These RSEs will have a twelve-year lifespan, with the idea the process will be repeated in 2030. There will be only two phases of the RSE process over the lifetime of the NPF. It is important that a comprehensive review of the NPF is conducted prior to the second phase of the RSE process commencing.

Regional assemblies should be given all the necessary support and technical assistance in preparing RSEs. A high degree of complementarity with future local development plans can be achieved by seconding planners from the various local authorities for the six-month preparation period. Additionally, each a consultation and engagement strategy must be part of the RSE process in each region.

Ensure synchronisation of local development plans with the NPF

The RSEs will in turn guide local authorities in developing their respective development plans. The alignment and interaction between these plans must be an adequate supply of commercial and residential property, attractive areas to live, availability of skills and higher density, underpinned by required infrastructure. We understand this hierarchy will be specified in law through the Planning and Development (Amendment) Act 2016.

It appears that there will be a slow ramping up of integration between RSEs and development plans. Each regional area will have only one local authority development plan to vet in 2019 and at most three in 2020. Almost 60% of our local authorities are not due to publish new development plans until 2021 at the earliest. Three local authorities (Waterford, Limerick and Tipperary), created as a result of mergers under the 2014 Local Government Act, require new development plans. They are currently operating under plans drawn up prior to their respective mergers. Will these local authorities be required or allowed to develop new plans immediately following conclusion of the RSE process? The future governance arrangements for local authorities in Cork and Galway have yet to be finalised and clarity will be required over the timelines and/or impact changes to boundaries/structures may have on their respective plans.

Each regional assembly will also be responsible for vetting local development plans for consistency with the NPF priorities. This is further complicated by the presence of smaller, specific local area plans. These local plans will have to be checked for consistency by both the responsible local authority and the relevant regional assembly. Take for example, if each municipal district in Ireland were to have a specific local area plan, this would result in a total of 176 plans (local and regional) being checked against the one overarching national plan. The three regional assemblies must be given adequate resources and support in carrying out their role in reviewing all local plans.

Planning for growth in our five metro areas

Metropolitan Area Strategic Plans (MASPs) will be developed for the five cities of Dublin, Cork, Limerick, Galway and Waterford. The MASP approach overcomes a significant barrier that our cities have faced. Our cities have been organised around administrative not economic boundaries. Institutionalising collaboration between local authorities on economic and spatial development is to be welcomed. Some like Cork City and County Councils have a considerable track record in collaborative spatial planning. Unfortunately, other city regions don't. The metropolitan boundaries for Waterford, Limerick and Galway must be immediately agreed for them to be properly incorporated into the forthcoming RSEs.

Getting the MASP approach right will represent a willingness of Government for a new risk sharing partnership with local and regional authorities. The draft NPF is vague on when these specific 12-year plans are to be finalised. It appears that these are to be developed subsequently to the RSEs. It is important that development of MASPs occur as close to the finalisation of RSEs as possible. Slippage must be avoided. It is not sufficient for MASPs to be developed following the implementation of local government reforms (e.g. possible directly-elected mayors etc). Waterford and Limerick are making decisions on the back of extended development plans.

MASPs allow us to further streamline and harmonise spatial planning within our cities. Greater synchronicity over local development plans covering our city regions should occur alongside the MASP process.

Metropolitan Dublin covers all or parts of seven local authority areas, yet there's five years between the first and last local authority in terms of developing their respective development plans. Clarification will be

Building a better future: it's everyone's future

required on how each MASP is developed. Is it intended that each local authority within a metro area pool planning resources to draw up these plans or will it be done in tandem with the regional authorities etc?

Uncertainty around the specific timelines and how collaborative strategies interact with local development plans also extends to joint planning strategies for urban towns located across two local authority areas. These concern our larger urban centres (e.g. Athlone) and smaller towns, in excess of 5,000 people (e.g. Portarlington). It needs to be confirmed if the requirement for joint plans extends to towns located across administrative boundaries but either wholly (e.g. Leixlip) or partially (e.g. Drogheda) within a metropolitan area.

Specific regional concerns

Ibec is organised into 8 regions. Each region has its own regional executive council (REC), headed by a regional president, championing business and addressing local issues. We have consulted each REC in developing our response to the draft NPF and indeed, in preparing our earlier submission 'Building a Better Future: It's Everyone's Business'. Feedback and input have informed the general points contained throughout this submission. However, two regions have been overlooked in terms of not having a city or designated urban centre of scale. Given the focus on the implementation and planned duration of the NPF, it is important that neither the North West or Midland regions are statutorily disadvantaged. We have included specific views of both RECs.

Ibec Midlands REC

The Ibec Regional Executive Committee in the Midlands, which represents Ibec members from across the Midland counties of Laois, Longford, Offaly, Roscommon and Westmeath, prepared this regional submission in response to the draft National Planning Framework (NPF). Committee recommendations and observations are outlined.

RECOMMENDATIONS

The Midland region is a vital centre for development for the entire country. Clear strategic planning must be provided within the NPF to allow the Midlands to develop, grow and reach its full potential.

The integration of the priorities outlined will serve to augment the effectiveness of the overall NPF, result in more effective joined-up spatial planning and support long-term economic growth.

The key priorities for the final NPF include:

1. Urban centre of scale designation for Athlone with clear future growth targets and investment strategies.
2. Commitment to improving travel times and infrastructure provision through the North West corridor by upgrading to motorway status the N4 Sligo-Dublin.
3. Regional coherence for the Midlands at a national planning level.
4. Commitment to a North-South link strategy at a national level to include a corridor through the Midlands.

Recognise the Midlands as a driver of growth

The Midland's central location has the potential to support the future growth and prosperity of the entire country. The region's location is a distinct competitive advantage. The NPF must fully unlock the region's potential to contribute to national economic growth. This requires a different approach to future planning because the draft NPF fails to recognise the centre as an engine of growth for the whole country. Developing the Atlantic Economic Corridor to create a necessary and much-needed counterbalance to the East Coast is welcome but it leaves a significant development gap in the middle of the country. The Midland region requires its own specialised strategy for development to avoid being marginalised.

The NPF must exploit the central geographical location of the Midlands as a transport and distribution hub for the country with regional and national benefits. A North-South link strategy, incorporating a central spine

corridor through the Midlands is essential to providing a pathway for the efficient movement of goods and people between the country's main economic centers. The North-South corridor is essential to the region's long-term development. North-South access would also serve as a solution to current traffic congestion problems in particular locations including the M50.

A clearer commitment to improving travel times and infrastructure provision through the North West corridor is needed. The committee notes the reference in the draft NPF to '*upgrading northern sections of the N4 route*'. This does not reflect the urgency of the investment required to address what is a critical connectivity gap and major obstacle to growth. The upgrading of the N4 and connecting the North West to Dublin must be a short-term strategic priority for government. This is also priority for the Ibec North West region and is highlighted in the Ibec North West Regional Executive Committee response to the draft NPF. The economic success of both regions is dependant on this upgrade.

The well established industry clusters in the Midlands in software, medical devices, pharmaceutical and ancillary services sectors play a major role in positively influencing the region's economic performance. A high quality infrastructure network is paramount in supporting the growth of these global reaching sectors and driving productivity and regional competitiveness. Yet, the draft NPF fails to maximise the potential the Midlands has to offer and the strategic opportunities that would arise from its development. It is vital the NPF positions the country's core region as a key contributor to overall national economic growth. It's central position enables the region to become a hub of regional connectivity, growth, and development, working in all directions and empowering all regions.

Athlone must be the region's urban centre of scale

In the draft NPF, no urban centre of scale is identified in the Midland region. Identifying a regional urban centre for strategic development with growth targets will act as an engine of economic growth for the whole region. We believe Athlone should be identified as the main urban centre and central driving force for the benefit of the entire region. A clear focus for growth for Athlone is required to secure the critical mass and strong urban economy of scale required to contribute to national development and competitiveness.

Economic activity is always likely to be concentrated heavily in urban areas all else being equal, leading to regional inequalities. Expectations that the benefits of investment in Dublin City would trickle down to the Midlands to levels of sufficient scale to stimulate regional growth and position it to reach its full growth potential are misplaced. Athlone is the only urban centre that straddles two different planning areas. The specified priority cities of Galway and Dublin are within these two regional assembly areas. The NPF must recognise the unique challenge that this presents.

The NPF must provide regional coherence for the Midlands

Without regional coherence for the Midlands at a national planning level, the NPF will result in mere trickle-down benefits for the Midlands. The draft NPF ignores the region's economic strengths. In many ways, the inter-regional disparities within the Eastern and Midland Regional Assembly will be strengthened leading to further regional imbalance. For example, Dublin makes up 41% of Irish GDP, with the greater Dublin area making up 49%. Dublin has the 33rd highest GDP per capita of any NUTS3 region in the EU. The Midland region, on the other hand, is in the bottom 50% of European regions.

There are fundamental challenges within the region that need to be addressed in the NPF. The Midland region is significantly exposed to a 'hard Brexit' with a large proportion of employment in the region in the most Brexit exposed sectors. The Midlands also has a much stronger reliance than most other regions on the indigenous sector. Overall, it is the indigenous sector of the economy that is most reliant on the UK. A regional growth strategy through targeted investment to improve the collective offer of the region in terms of infrastructure, liveability and choice in terms of housing, employment and amenities is required to enable the Midlands to prosper.

The Midland region is at risk of losing out and under-performing under the current approach being taken to achieve a more effective balance of growth between Ireland's three regions. A coherent and clear growth strategy for the Midland region is necessary to allow it to develop, grow and reach its full potential.

- Response prepared by the Ibec Midland Regional Executive Committee

Ibec North West REC

The Ibec Regional Executive Committee in the North West, which represents Ibec members from across the North West counties of Donegal, Leitrim and Sligo prepared this regional submission in response to the draft National Planning Framework (NPF). The NPF must present a clear vision for the North West to grow sustainably. Committee recommendations and observations are outlined.

RECOMMENDATIONS

The North West has many advantages in terms of natural resources and quality of life. To realise the untapped potential of the region and capitalise on the significant advantages it has to offer, a number of key priorities must be implemented.

The key priorities for the final NPF include:

1. The NPF must identify the two regional urban centres of Sligo and Letterkenny-Derry to stimulate the achievement of critical mass in terms of population and economic activity in the region.
2. Prioritising access to the North West and enhancing accessibility within the region through the upgrading to motorway status of the N4 Sligo-Dublin and upgrading the N14 Letterkenny-Lifford, M17 Tuam-Sligo, N15 Sligo-Letterkenny and the A5.
3. There needs to be specific clear timelines for the roll-out of the National Broadband Plan in the North West.
4. References in the draft NPF to the development of Technological Universities do not include specific mention of the establishment of a Technological University in the region. The development of a Technological University is important to the future of the North West and Western regions for growing the region's enterprise and economic base.

NPF must address peripherality

The NPF planning must address regional peripherality. National planning has for too long failed to prioritise the the North West. Investment has never materialised. Under the draft NPF, the region's future development will still not be adequately supported. The region has lost out over many decades despite many political commitments to develop the region.

The unique circumstances of a non-urban peripheral region are not taken into account. The North West is disadvantaged by poor access and by low and falling population density. This constrains investment. Access to the North West must be a priority in the national planning agenda. Enhancing accessibility within and to the North West will enhance the competitiveness and attractiveness of an area most exposed to the potential impacts from Brexit.

The committee welcomes the inclusion of measures to improve accessibility to the North West. However, references to *'upgrading northern sections of the N4 route'* and to *'progressive development of the Atlantic Economic Corridor from Galway northwards'* does not reflect the urgency of the need for better connectivity. It is crucial that a commitment is provided to upgrading key routes in the short-term to connect the North West with Dublin and with other regions. Advancement of the A5 and completion of the Atlantic Economic Corridor routes are vital to enable the region realise its full potential.

The upgrade of the N4 to motorway status to connect the North West to Dublin must become a short-term strategic priority for government. This is also a key priority for the Ibec Midlands region and is highlighted in the Ibec Midlands Regional Executive Committee response to the draft NPF. The economic success of both regions is dependant on this upgrade.

The significance of broadband for future growth in the North West, particularly in the more sparsely populated areas, is not recognised. Clear timelines to reduce the digital divide by investing in broadband in areas with no or only limited coverage must be provided. This investment would create new economic opportunities for the region. It would facilitate remote and home working and open up access to virtual learning environments with options of distant and online study, thereby increasing access to higher education.

References in the draft NPF to the development of Technological Universities do not include specific mention of the establishment of a Technological University (TU) in the region. A TU along the Atlantic Economic Corridor will pave the way for growing the enterprise and economic base of the region and is vital to the future of the North West and Western regions.

The development of the North West must become a national policy priority. This will be essential to provide support to large and small businesses with growth aspirations. The North West will be significantly impacted by the redefinition of the EU, resulting from Brexit. The draft NPF fails to reflect this. It must be recognised that conditions are not the same in all regions and decisions must be made at national planning level to address this.

The North West should have two regional urban centres

The committee welcomes the reference to the North West Strategic Growth Partnership and the stated national policy objective to promote the development of the North West City Region as interlinked areas of strategic importance. However, the draft plan does not go far enough in terms of committing to the development of specified urban centres in the region and addressing issues of scale and peripherality. No major urban centres of scale are identified in the North West region. Identifying regional urban centres with growth targets will act as engines of economic growth and competitiveness.

The NPF must identify the two regional urban centres of Sligo and Letterkenny-Derry. The two will stimulate the achievement of critical mass in terms of population and economic activity in the region. Channelling growth to these two geographically dispersed urban centres would support targeted population growth in the NWRA, helping achieve wider regional and national planning objectives. The development of strong regional urban centres with quality transport links will provide support for overcrowded cities, population growth and the attainment of better regional balance.

The North West has experienced a decline in its population since 2011. The region is particularly exposed to population decline with younger and better educated people moving to more urbanised areas. Population decline has consequences for the economic base, labour market and social infrastructure of the region. Much more needs to be done in this respect to move development and growth of the North West in a sustainable direction.

The need for sustainable and effective regional development

Regional and national development are essentially two different facets of a common objective. An 'all regions' approach to national planning must be adopted. If not, the NPF would put the North West at a distinct disadvantage. The NPF must set out a vision for achieving sustainable and effective development for the North West. The objective of a national planning strategy should be to ensure that all regions grow and reduce disparities between the levels of development across regions. A fair balance of development recognising the importance of all our regions is essential.

Focusing on concentrating economic development in city-regions should not be at the expense of the future development of city-less regions. In the absence of policy intervention, economic activity will continue to concentrate in city-regions only. Measures must be taken to support the development of regions that are found to be lagging behind such as the North West.

The provision of an adequate level of infrastructure is central to the economic and social development of the North West and the achievement of balanced regional development. Investment in critical infrastructure has the potential to realise a high and sustained rate of growth in the region. The aim must be that over the period to 2040, each region should realise their potential for economic development and attain levels of accessibility and standards of living similar to the rest of the country.

- Prepared by the Ibec North West Regional Executive Committee



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