



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



Derry City & Strabane  
District Council

Comhairle Chathair  
Dhoire & Cheantar  
an tSratha Báin

Derry Cittie & Strábane  
Destríck Cooncil

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

**Ireland 2040: Our Plan - Issues and Choices  
Consultation by Department of Housing, Planning,  
Community and Local Government (IRL)**

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**March 2017**

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

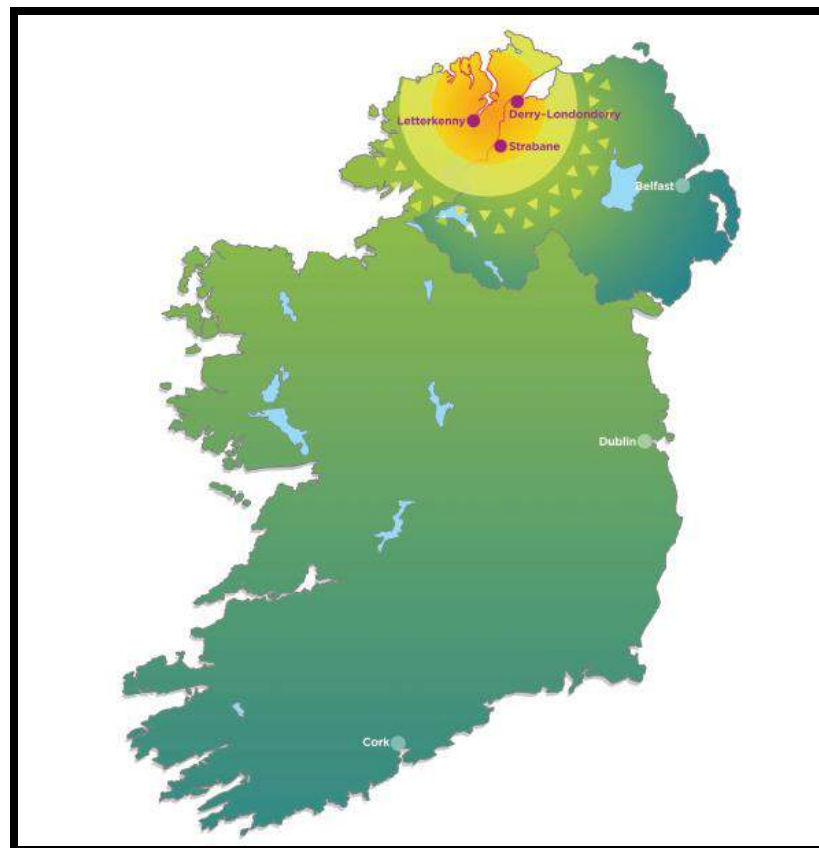
- **The North West is a cross border City-Region, with Derry at its core as a Tier 3 City with an Urban Population in excess of 100,000 which reaches across the border, and a wider regional population of 350-400,000 people. It needs to be planned for as such. Derry City is the third largest city within the NPF jurisdictional area after Dublin and Cork;**
- **The North West Region of the Island of Ireland is the fourth largest urban agglomeration on the island of Ireland;**
- **35% of the population of the North West City Region are under 25 years of age (one of the youngest populations in Europe);**
- **The North West City Region currently has a higher and further education student population of 40,000;**
- **The region is home to two major acute regional hospitals;**
- **In light of the decision by the UK to leave the EU, the new arrangements to support the growth of the North West Region have taken on an additional significance for the economy and, indeed, the broader sustainable development of the island as a whole. These arrangements are supported by the Irish Government, builds on the designation of Letterkenny/Derry-Londonderry as a linked gateway in the *National Spatial Strategy*, and progresses the original objectives of the NWGI;**
- **A tailored approach to the North West Region will be the key to releasing the full potential of an NPF - particularly important given the likely challenges that Brexit will present for the Irish Economy. Such an approach must value calculated risk-taking and understand the principle of vision-based enabling investment that, in turn, can release dynamic development processes into the future. This shift is currently being facilitated through the new structures for the North West Region, and this outcomes-led work will continue into the future;**
- **The effective implementation of an NPF which includes Derry as the third largest city, and clearly references the North West City Region of Letterkenny/Derry-Londonderry/Strabane will have national significance; a more balanced picture of island-based growth emerges when Derry/Londonderry is included;**
- **In promoting itself as a City-Region, the new collaborative structures employed by Donegal County Council and Derry City and Strabane District Council are interjurisdictional and can facilitate innovative shared approaches to implementing best practice in spatial planning in the context of an NPF;**
- **For the North West City Region to be a driver of effective regional development, a number of key infrastructural investment priorities are highlighted in this paper which will support its potential as a viable and attractive regional complement to Greater Dublin; and**
- **The North West Region fully welcomes the emphasis placed on population health and wellbeing. Indeed, the region has provided significant leadership in the development of built environment approaches to population health.**

## 1.0 Background

This response is presented in the context of ongoing work by Donegal County Council and Derry City & Strabane District Council to firmly establish an approach to effective and resilient regional development and growth which is consistent with the objectives of the North West Gateway. A number of key points need to be understood about the North West Region, as follows:

Derry is the third largest city whose urban population falls within the NPF and the fourth largest urban agglomeration on the island of Ireland; and it and the wider North West City Region is thus a sub-regional economic driver for both jurisdictions (see Figure 1). Furthermore, it is the only functional economic region of such scale on the island which experiences a national jurisdictional border. As such, specific arrangements involving regional and local government leadership and partnership with central government are required in order for the region to release its full and considerable potential as a net contributor to the economy, North and South and in an East-West context. Additionally, associated high level collaborative arrangements are necessary in a range of sectors- including arrangements which facilitate a shared approach to growing the region's economy, and arrangements which empower higher and further education institutions in the region to collaborate at both strategic and operational levels.

**Figure 1: The North West City-Region**



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

Newly constituted collaborative structures allow for the North West Region of the island of Ireland, through Donegal County Council and Derry City & Strabane District Council, to respond in a coordinated and flexible way to both internal and external opportunities for co-operation, development and investment. The Councils, who are committed to taking a lead in the future

development of the region and supporting the strategic priorities of central government, have set out three objectives under which a range of strategic projects will be delivered over the short to medium-term.

These objectives are:

- (1) Achieving regional economic growth and investment;
- (2) Driving regional physical and environmental development; and
- (3) Promoting regional social and community cohesion and well-being.

Led by Local Government and involving close and co-ordinated partnership working with Central Government in both jurisdictions, this model was developed with the strategic assistance of the International Centre for Local and Regional Development (ICLRD). The new model for supporting growth in the North West Region, founded on the concept of place-based leadership as a means to delivering ongoing sustainable growth, has best practice in spatial planning as its core driver. The place-based structures to support the growth of the North West Region of the Island of Ireland consist of:

- The North West Regional Development Group, which will drive an integrated cross border approach to implementing shared priorities arising from the Community Planning/LECP processes; and
- The North West Strategic Growth Partnership, which involves Local Government and key Central Government representation and will deliver durable coordinated and partnership-based cooperation between the region and central government in Ireland, Northern Ireland, and in a wider East-West context.

These structures, endorsed by the North South Ministerial Council at its Plenary Meeting of 4<sup>th</sup> July 2016, are a result of the continued engagement under the North West Gateway Initiative (NWGI), between officials from the Department of Foreign Affairs and Trade (DFAT), the Executive Office (TEO) and regional stakeholders regarding the direction and priorities for the North West region. The structures, as designed, can facilitate the implementation of specific commitments set out in 'A Fresh Start- The Stormont Agreement and Implementation Plan' (2015).

This model has, we believe, particular significance as an appropriate vehicle for strategic transboundary collaboration as it relates to implementation of a National Planning Framework in the context of the North West City Region with Derry/Londonderry at its core as the third largest city within the NPF jurisdiction after Dublin and Cork.

### **1.1 Purpose of this submission:**

The purpose of this submission, being made by the North West Regional Development Group (NWRDG) – See Appendix 1 - is:

1. To highlight our response as a region to the issues outlined in connection with a vision for Ireland 2040;
2. To highlight where a cross-border/all-island perspective needs to be taken into account in the expansion of spatial data and analysis in the paper.

## 2.0 General Comments:

- Derry is the third largest city with a functional territory which lies within the NPF jurisdictional area; it has a population in excess of 100,000 people and as such is a **Tier 3 City**. Derry is not named in the maps within the Issues Paper. We would hope that this will be rectified in any future drafts.
- The presentation and wording in this section of the document would seem to be out of step with the Irish Government's overall statement of intent as to the significance of an NPF as a cornerstone for ongoing North South Co-operation, and as a crucial component of Ireland's response to the potential impact on the Irish Economy of Brexit (An Taoiseach's speech to the IIEA, 15 Feb. 2017).
- It is a cause of some concern that in the general analysis in Section 2 of the document, an approach appears to have been taken to articulating trends in the Republic of Ireland which do not in any way reference the fact that Donegal and Derry's status in spatial analysis terms (and therefore in terms of what planning needs to look like in that county) is significantly influenced by the spatial demography associated with their location on the border;
- It is regrettable that very little if any reference is made in this section to the importance of Northern Ireland as a spatial dimension to Donegal in the case of the North West; this is particularly concerning given the centrality of policy initiatives such as the North West Gateway Initiative (NWGI) to the *National Spatial Strategy*.
- The North West Region has based its assumptions of opportunity for growth and development on more sustainable settlement and commuting patterns. It seeks to address the issue of long and unsustainable commutes and population migration through reduction of the distance between place of work and home.
- No reference is made in Section 2.2 to the significance of transfrontier population and economic activity in terms of settlement patterns, movement of workforce or business growth.
- With reference to Section 2.4.8, we endorse the idea of an NPF being a statutory document, and also the importance of alignment of implementation with public and private investment supports. We agree that it should address all parts of Ireland. We also agree with the notion expressed in this section that treating all parts of the Country in the same way will not be realistic - this will not achieve equality of outcome and a stronger overall set of national outcomes. For this reason we believe that diversity of approach to different regions including the North West Region will be the key to releasing the full potential of an NPF- particularly important given the likely challenges that Brexit will present for the Irish Economy.

## 3.0 Section 3 – Health and Well-Being

The North West Region fully welcomes the emphasis placed on population health and wellbeing. Indeed, the region has provided significant leadership in the development of built environment approaches to population health - including:

- pioneering health impact assessments as a key stage of planning and development processes;
- area-based approaches to health promotion (Derry Healthy Cities Model, Early Intervention City, Compassionate Cities status - under exploration);
- development of significant cross-border greenways to facilitate both sustainable transport and healthier, more active lives for the population of our region.

A lifelong cycle of health as a concept needs to underpin the NPF's approach to health and wellbeing given the timescale and scope of 'Ireland 2040' - while it is important to address key issues such as obesity and smoking, a more comprehensive analysis of the role of planning in health outcomes is required. This is particularly important in areas of high urban and rural deprivation where health inequalities are more concentrated. This is a national issue and not confined to the border counties. As previously noted, one of the three key regional growth pillars adopted by the Councils as part of their new collaborative working model is Social and Community Cohesion and Wellbeing. Particular reference should be made within the NPF to the evidenced impact of the border on health and wellbeing, and a stocktaking as to how area development plans can meet the specific needs of the population. It is important that the NPF facilitate planned work around the convergence of public health improvement strategies and physical and built environment

The North West Region fully endorses the issues highlighted in the 'Where to Next?' section of Section 3 of the Issues Paper. In addition, we believe that explicit reference to the following will ultimately assist with the implementation of an NPF by helping those responsible for planning and development to draw the connection locally with specific population health trends which will have direct implications for planning and in which planning and the built environment have significant power to deliver positive population health and wellbeing outcomes.

**Policies that the NPF should include to effect improvements to our general health, including physical and mental wellbeing:**

- Specific recognition should be given to the significance of planning built and shared environments for an ageing population<sup>1</sup>;
- The NPF should include policies on supporting lifelong wellbeing at home, planning for dementia<sup>2</sup>, and planning for healthy children and young people as the adults of tomorrow. This should include a programme of guidance to counties on planning for locally-accessible and safe physical play and activity areas; planning for primary care intervention centres – linked to quality of life indicators; and planning for reduced social isolation thus positively impacting on mental health and well-being.
- Cross-border commuting is the 'norm' for large numbers living in the North-West Region (see Figure 2). Greater emphasis is needed on the risks to health of habitual long commutes - associated risks of higher levels of long-term conditions in the population.
- Specific focus needs to be given to the health of the economically active workforce and what particular approaches are needed to maximise the impact of environments which promote health and wellbeing. This will relate to the need for those leading planning processes to engage with employers and the business sector to look together at cultures and work patterns which either promote or prevent health and wellbeing.
- The NPF needs to take account of changes in how healthcare is delivered, with increasing delivery of acute and enhanced care in the community and at home. The role of planning in this is crucial - in exploring the spatial dimension of primary care availability, sub-acute multidisciplinary delivery centres, ambulatory care centres, and in facilitating housing solutions which maximise independence for people living with frailty, for as long as possible.

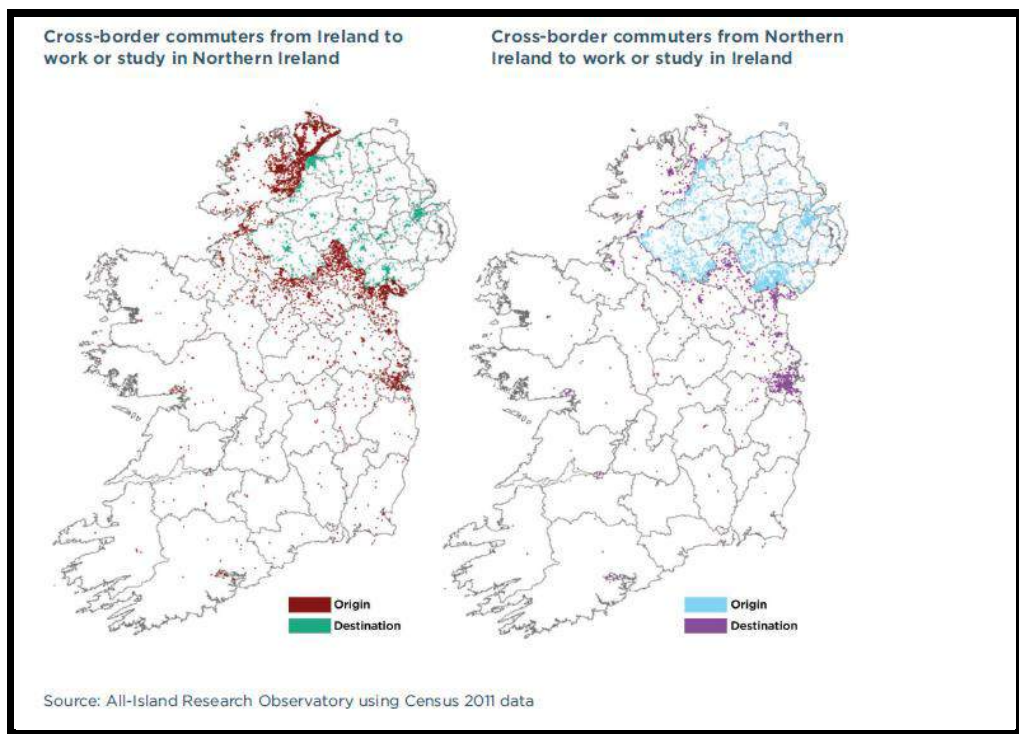
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<sup>1</sup> Every local area should have a focus on maintaining mobility and strength for older people in terms of shared public domain planning.

<sup>2</sup> The De Hogewijk model of housing for people with Dementia should be examined as an international model of best practice.

- In the border counties, planning of community health and intervention facilities should take account of cross-border flow and uptake of services in Northern Ireland e.g. Maternity services.
- Planning of public and community transport services in conjunction with the availability of multidisciplinary/interagency community-based support services will be crucial to prevent further exclusion of the most excluded.
- The NPF needs to make specific provision for the planning of I 'healthy' infrastructure to allow for engagement with harder-to-reach communities who experience higher levels of health inequalities, poorer mental health, and who do not automatically see themselves as the users of infrastructures for health. Models which could be useful include the development of community facilities which house community-based health and wellbeing supports and offer primary care interventions to people of all ages<sup>3</sup>.
- As a general principle, every community should have access to preventative health supports delivered through a multidisciplinary approach involving statutory, voluntary and community sector services. The model adopted for this in Northern Ireland is Healthy Living Centres and the Family Support Hubs. The importance of Family Resource Centres and equivalent multi-purpose service hubs at the heart of communities is vital. The connection between positive mental health for adults and children, and positive family supports available in a community, is well-documented.

**Figure 2: Cross-Border Commuting Patterns**



(Source: All Island Research Observatory).

<sup>3</sup> Creggan Healthy Living Centre and the Bogside and Brandywell Health Forum are useful examples of this, as is the Northern Ireland Public Health Agency exploration of co-operation with Greenways development to achieve community engagement with infrastructure.

## 4.0 Section 4: A Place-Making Strategy

The theme of place-making has been central to the collaborative processes underway in the North West; and the Councils welcome the inclusion of this theme as a core element of the NPF Issues paper. The Councils acknowledge that a more balanced picture of island-based growth emerges when Derry/Londonderry is included. Section 4.1.3 appropriately takes an island-wide perspective. However, other sections of the document continue to list cities on the island without including those in Northern Ireland. This is particularly crucial in the case of the North West City Region, whose functional territory and immediate hinterland is cross-border in nature. The Councils thoroughly welcome the citation of the North West Strategic Growth Partnership as an approach that provides a pathway for more effective performance at a spatial level (Section 4.4). The maps in Section 2 and 3 are, however, very disappointing as they fail to capture the inter-relationships between settlements, North and South; with Northern Ireland being left blank. We feel that the document will benefit from a more integrated and woven-in referencing of Northern Ireland and its functional territories throughout all sections rather than covering North South issues in one chapter only. There is a clear need for the North West City Region of Letterkenny/Derry-Londonderry/Strabane to be included in the NPF – recognising its capacity and potential to be a driver of effective regional development for the wider Northern and Western Region of the island of Ireland.

Letterkenny/Derry-Londonderry/Strabane comprises a significant city region in the context of the Northern and Western Region. In developing the concept of a 'Gateway to Growth' both councils have demonstrated that they already view each other as partner areas for the purposes of regional planning. They have commenced a process, for example, which links Donegal's LECP process to the Community Planning process of Derry City/Strabane through the North West Growth structures.

Through the regional growth structures established for the North West City Region, which is cross-border in nature and has the full support of local and central government in both jurisdictions, collaborative approaches focusing on the key areas of human capital, critical mass of population, density, infrastructure and complementarity of urban centres on a cross border basis will be explored (and indeed are already being investigated).

In terms of education, the new structures are examining the links between Higher Education policy in both jurisdictions as it relates to the cross-border area, and linked approaches to Skills/Workforce development that effectively maximises the use of resources and opportunities across the region regardless of jurisdiction. The North West Regional structures, and the approach which underpins these, is facilitating the region to maximise the available opportunities presented by the willingness of the higher and further education sector to work together across the border for the growth of the region. For example, the region is collaborating on skills and education progression pathways based on a complementarity and progression model through partnership between Higher and Further Education Institutes - and key sectors and industries. More of this is needed as a routine measure in order to retain skills within the region and to address what is effectively forced economic migration out of the region. High level strategic support for this considered and operational cooperation between further and higher education institutions is required on an ongoing basis in order to support a dynamic regional workforce and to maximise the growth potential of the region.

In terms of economic development, a shared place-based approach to attracting Foreign Direct Investment (FDI) to the North West has already been established, and is starting to show evidence of effective delivery on the ground. Clustering of business support capacity within and across the urban network of the City Region of Letterkenny/Derry-Londonderry/Strabane has the intention of (a) placing the region on a firm infrastructural footing that is (b) achieved through



cross-sectoral and cross-departmental collaboration, alignment and co-ordination of both capital and programme resources, on a middle to long-term basis. It is intended that the work of the North West Strategic Growth Partnership (NWSGP) will facilitate the connections that will be necessary between the Regional Infrastructure Development Plan in Northern Ireland, the Regional Economic Development Strategy for Northern Ireland, and key Irish Government activities such as the National Capital Spending Plan<sup>4</sup>. Early and ongoing engagement will take place on these matters in the context of the Irish Government's support, led by Department of an Taoiseach, for a strong cross-border focus in the NPF.

The Councils believe that the development of city-region-type complements to Dublin cannot be achieved through a top down approach alone, and that a place-based cultural commitment to collaboration is key to successful complementarity in a city-regions model for national development and growth. Placing an emphasis on the key Irish cities outside of Dublin poses a challenge for the whole of the Irish border region; such an approach effectively draws a line from Galway to Dublin with no city-region identified north of this line.

With the suburbs of Derry City reaching into Donegal, and the work to date by the Councils in setting the foundation stones for a North-West City Region, there is a strong case for the formal inclusion of this space as an attractive alternative location to Dublin. The methodology and approach that has been used in the North West has ensured that the interactions between settlements in a trans-jurisdictional region can be explored in depth, and the work of the North West Strategic Growth Partnership will be helping to deliver the North West City Region as a strong regional complement to Dublin. This will add value to the wider Northern and Western Region by providing a City-Region focus to an under-served region characterised by historic under-investment, smaller towns, and rural peripherality. We believe that the North West City Region, appropriately supported with the right levels of comprehension, ambition and commitment, can deliver significantly for the entire North West of the Island and thus act as a valuable counterpart to Dublin.

We would also like to emphasise that this kind of collaboration involves a step-change in the culture and modus of 'business as usual' and relies heavily on both strong leadership and sustained, consistent relationship-building alongside more formal governance and policy-related enablers.

A connected city region recognises the complementarity in the dynamic between larger urban city areas and towns in the wider hinterland. In a city region where there is a culture of mutual and collective support for measures which contribute to a quantum strengthening of the region, the relationship between the city and its hinterland becomes less problematic. In the North West, an approach which recognises that an investment in a smaller town is an investment to which the rest of the city region can respond and support, has been agreed as a fundamental principle - as has the agreement that different settlements all have their significance in helping a city region to work properly.

A decade and more of boom and bust has, however, negatively impacted on the spatial pattern of our small towns and villages; with many now characterised by a persistent trend of decline and decay. A key role for the NPF will be supporting rural Ireland in unlocking its potential and, where necessary, shaping a new future, based on the intrinsic potential and nature of small

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<sup>4</sup> Through the Strategic Growth Partnership, the North West Region will benefit from a shared and linked approach to the economic growth of the region by the range of agencies and departments on both sides of the border. Alone, these agencies carry only part of a brief which impacts on the economic growth of the region or of business development within and for the region. Working together, it is anticipated that mutually acceptable approaches to joint investment and programming will be explored as the work of the Strategic Growth Partnership progresses.

towns and villages - this is true of small towns and villages within the North West City Region as it is elsewhere.

The region has significant interest in both the Ocean and Coastal dimensions of the Marine economy. The Councils in the North West have a strong track record of collaboration in marine spatial planning and integrated coastal zone management going back 10 years. As an island, integrated spatial planning, which connects onshore and offshore assets, is essential for effective future planning across the island as whole. This is particularly important in planning for the Port of Derry, the Port of Killybegs, and the marine tourism potential of the wider North West Region. The waters will play a key role in exploring new approaches to energy harvesting and storage (see Section 5 below). Coastal communities can, in particular, suffer as a result of the fractured functions which lie across various local and national departments and agencies.

### **Key messages in framing the National Planning Framework and developing the Draft Plan:**

- The Councils of Donegal County Council and Derry City and Strabane District Council call for the designation of the Letterkenny/Derry-Londonderry/Strabane agglomeration as the North West City Region - acknowledging its capacity and potential in delivering on effective regional development.
- A range of economic and sectoral opportunities and clusters have been identified in the North West, all of which have been underpinned by a place-based development and regional FDI marketing approach which should be built on and explored with statutory economic development agencies on both sides of the border. International evidence indicates that such approaches deliver increased effectiveness for the development of border regions as a whole.
- Building on the success of the region in delivering third level education, arrangements must be put in place to enable collaborative strategic and operational working between UU, LYIT and North West College.
- The NPF should give specific attention to remedial and progressive interventions to address the issue of rural broadband supply and resilience (see Section 6 below); key to building the resilience of rural towns and villages and in place-making.
- Building on the above point, the NPF must support rural Ireland in boosting job creation and progression opportunities that will, in turn, rejuvenate rural settlements, reverse economic decline, stem population decline, combat rural isolation, build safer communities. This does not need to be at the expense of our cities – rather this is a win-win scenario for urban and rural communities alike.
- Examine in more detail the proposal within the Rural Development Action Plan to develop an Atlantic Economic Corridor as a mechanism for achieving balanced regional development; with specific consideration as to the potential role of a North West City Region within this.
- The NPF must take account of the key regional priorities of increased FDI (and the approaches required to deliver effective regional growth through a collaborative alignment of all available resources).
- The NPF must support the further development of air access and route development to City of Derry Airport and Donegal Airport, which will benefit the whole of the North West Region, and the ongoing priority of improved road infrastructure which links Derry as the third largest city within the NPF jurisdiction, and the fourth largest city on the island of Ireland, to Dublin as the Capital of Ireland (see Section 6 below).
- The NPF must recognise the need for infrastructure development at Greencastle to support significant ship access to the Foyle, and boost regional tourism product (incl. the role of marine facilities in this).

- The North West Strategic Growth Partnership is an example of an appropriate mechanism and enabler for an animated and facilitated interactive process which can deliver a joined-up approach to strategic infrastructure and investment decisions as above. The North West Strategic Growth Partnership will facilitate a collaborative space in which key stakeholders in strategic infrastructure and investment decision making can work together across organisational and jurisdictional boundaries to achieve best value for money for all types of investment. Where possible, local area development plans should cross-reference infrastructural priorities
- Funding is key to the ongoing growth of the North West Region – including dedicated regional growth funds. As discussed in Section 7, there is a recognised need for integrated performance objectives and performance reporting solutions for collaborative approaches to commissioning of activities and capital developments - this will facilitate more ready and habitual alignment of resources from across all funding areas into a regional outcomes model which delivers for all. The Councils of the North West City Region are currently investigating relevant models which will allow for this collaborative investment approach.

## 5.0 Section 5: Ireland’s Unique Environment- Sustainability

Environmental assets do not adhere to man-made boundaries and it is widely recognised that there are many challenges - and opportunities - in integrating environmental management and development strategies at national, regional and local-policy level. Protection and management of the environment lies at the heart of European thinking; with the need to protect and conserve the environment referenced in numerous Directives. For cross-border communities, this necessitates a commitment to cross-sectoral, cross-departmental and inter-jurisdictional collaboration as many of these assets transcend the Irish border.

The failure and lack of investment in major infrastructure in the North West, particularly in energy, is hindering the sustainable growth and development of the region. The shock of a major energy infrastructure failure would severely impact the entire NW region, most drastically Derry City/Strabane and Letterkenny. According to 2014 figures, Northern Ireland’s generating-margin (spare-capacity) has dropped from 600 to 200mw, in part due to generation restrictions at old generating-plants and ongoing maintenance of the grid. Donegal is the only county in Ireland with limited 220kv capacity, and this, together with one of the North West’s main power-plants located at the end of the line, makes the region vulnerable to system interruptions elsewhere. Although 110kv lines appear adequate for the moment, this combined with being away from generation centres, an ongoing lack of a North South Interconnector and being at the end of the line means the North West remains vulnerable in terms of energy supply, something which can be addressed through a strategic and innovative approach to planning the region.

In terms of re-energising Ireland and promoting green infrastructure, the North West Region recognises its’ potential develop as a low carbon region by using energy efficiently and by utilising local sustainable energy resources. This will benefit the environment, local communities and will play a significant role in attaining energy security for the island of Ireland. Key areas of any such strategy would include attaining energy efficiency in homes and businesses, addressing fuel poverty, harnessing Renewable Energy and the planning and regulatory systems and the structure, coordination, integration and consistency necessary to support sustainable energy and economic development. As noted in the consultation document, “Good planning is important for the sustainability of our environment” (p.42). The North West is recognised for the potential it offers in terms of off-shore energy; and there is a strong case for the region to become home to a Strategic Energy Zone or Corridor building on its off-shore wind and wave potential.

Membership of the EU aside, it is entirely possible to develop shared environmental strategies which encompass protection and exploration of renewable resources while seeking to manage and protect the overall environment. The North West Strategic Growth Partnership is ideally placed to deliver on this type of collaboration which can then be undertaken as a complementary and discretionary activity, where it is not possible to elevate this to the status of a required or statutory activity in both jurisdictions.

In order to achieve such a vision for local sustainable energy supply, it is vital to get the region's populace involved and on board. Therefore, the development and implementation of an energy and awareness strategy, for the North West is vital.

Tourism, culture, landscape and heritage are also recognised as being key economic drivers for the North West region; with many opportunities to expand offerings in the areas of Natural Landscape; Maritime Tourism; Heritage Trails; Emigration & Diaspora and Cultural Tourism; and Rural and Activity Tourism.

**Policies that the NPF should include to effect to ensure a sustainable balance between safeguarding our environmental and cultural assets while planning for growth include:**

- An NPF could facilitate further opportunities to enhance energy resilience in the North West as a whole. Progress on the North-South inter-connector remains vital to the region as a whole.
- Promoting high quality urban living (and place-making) as an attractive alternative to dispersed rural one-off housing programmes – this in itself brings with it added benefits around air quality, reducing emissions and meeting carbon reduction targets, and cutting transport running costs.
- Establishing multi-agency partnerships charged with addressing the divergences between where people live, work and socialise – both at national and regional level (again contributing to climate resilience and low carbon economies)
- Taking a leading position on the protection, management and planning of the landscape of the North West by developing a Regional Landscape Strategy.
- Development of a North West integrated cross-border heritage strategy incorporating national parks, the WAW, Irish walled towns, cultural and ecclesiastical networks, and tapping into the designation of 2018 as European Year of Cultural Heritage.
- Offering greater investment and availability of energy efficient new builds and retro-fitting schemes for public and private housing and public sector buildings.
- Development of a Strategic Energy Zone/Corridor off the North West coast – focused on harnessing the wind and wave potential of the oceans surrounding this part of the island (linked to any national maritime spatial plan).
- The NPF should give specific attention to the issues of energy supply and resilience, linking these not only to the renewables potential of the region but also to opportunities that may exist for greater energy supply for places such as Donegal through connection to existing infrastructure e.g. at Coolkeeragh which is situated on the other side of Lough Foyle, a shared environmental asset which is managed through the Loughs agency (one of the North South Bodies).
- It would be useful to explore the possibility of alignment of priorities and approaches to environmental management across catchments in the context of the cognate planning functions which now exist at a devolved local government level on both sides of the border. Simple and consistent collaboration in the preparation of area development plans and other protocols and procedures for shared approaches to environmental management are within the gift of the NWSGP stakeholders to agree and implement.

- Putting communities at the heart of the renewal energy programme by exploring micro-renewable energy solutions at level of community heating schemes, farm digestors, hydro-energy, solar farms, etc. as part of a wider Strategic Energy Zone/Corridor
- In support of agri-food sector (given the large rural area within the NW region and the significance also of the fishing industry), to pursue a local food movement: ranging from urban farms - covering city waste to community allotments – to developing a North West food network based on community models

## 6.0 Section 6: Strategic Infrastructure Investment

High quality infrastructure and regional connectivity is recognised as a key pillar of international competitiveness – as well as impacting on competitiveness within and across regions. An analysis of the location of Foreign Direct Investment (FDI) and export businesses highlights their tendency to locate and concentrate in urban areas and along the most developed sections of strategic networks – road and rail.

Recent research by IBEC-CBI and the Irish Academy of Engineering both point to the need for enhanced connectivity for the island of Ireland - pointing out the many benefits to economies, regions and society as a whole from the more efficient movement of people, capital, goods and services. IBEC-CBI, in its report ‘Connected: A prosperous island of 10million people’ argues that “Current transport infrastructure on both sides of the border is characterised by insufficient capacity and management” and that “Enhancing transport infrastructure across the island is a priority for advancing and protecting interests on both sides of the border, post-Brexit” (p.2).

Within the North West, it is recognised that there is a need to enhance regional connectivity and, more broadly speaking, the capacity of Letterkenny/Derry-Londonderry as well as Strabane (i.e. the North West City Region) to act as a driver of growth and FDI attractor. For the North West, this means creating a great place to live and work, providing a talented pool of potential employees and ensuring excellent access to customers and suppliers.

In the case of the North West, the new structures and arrangements for cooperation ensure that the functionality of Letterkenny and Derry-Londonderry, and the wider North West City Region, is clearly understood in terms of its full potential benefit to the national economy, and understands where key strategic priorities – including regional infrastructure priorities – can be aligned to longer-term regional outcomes. There needs to be a shift in thinking which values calculated risk-taking and understands the principle of vision-based enabling investment that, in turn, can release dynamic development processes into the future. This approach is being promoted in the North West.

Through the new structures of the North West Regional Development Group (NWRDG) and the North West Strategic Growth Partnership (NWSGP), the Councils are working collectively to build connectivity and vibrancy across the region. The achievement of this in terms of progressing regionally strategic infrastructure investment – that is also of national significance – is dependent on alignment between the NPF and the Capital Investment Plan. The Councils of the North West would welcome this alignment to happen even at this stage of consultation – rather than waiting for the mid-term review of the Capital Investment Plan in 2021 as mooted in this consultation paper.

In terms of planning for social infrastructure, there is an ongoing need to engage those agencies and departments with the remit for provision and delivery of social infrastructure in the spatial planning process, and provide opportunities for leadership to be developed in these sectors in

support of place-based spatial development models. The NWSGP allows for that connectivity and joined-up working to take place. A core objective of the strategic Growth Partnership is that it will align the planning and delivery of both physical, environmental and social developments which will release the full potential of the North West City Region as a net contributor to the Irish economy.

**Policies that the NPF should include to effect nationally strategic infrastructural priorities include:**

To support the growth of the North West City Region:

- Completion of the A5/N2 dual carriageway system from Dublin to Derry-Londonderry/Letterkenny serving the wider North and West of the Island.
- Completion of Ten T routes in Donegal – the N13, N14, and N15 as key elements of a roads infrastructure network in this regional context.
- Introduction of an hourly train service between Derry and Belfast with express non-stop services at peak hours and interconnectivity to Dublin.
- Committing to the effective expansion of the national aviation strategy to include City of Derry Airport as a closely adjoining airport with a long-standing cross-border catchment.
- Completion of a new high-quality dual-carriageway to replace the existing carriageway from Derry to the M22/M2 to Belfast and to join with existing dualled/motorway provision.
- Widening of the A2 Buncrana Road, Derry, to four lanes between Pennyburn Roundabout and the County Donegal border (two lanes in each direction).
- Regeneration of Waterside Train station and development of an integrated facility for rail and cross-border bus services as well as support for modal shift and sustainable transport approaches.

To support the revitalisation of smaller towns and villages and build the resilience of rural areas:

- Delivering on effective Rural Broadband regardless of location with all homes and businesses connected to broadband (as called for in the Rural Development Action Plan, *Realising our Rural Potential*).
- Investing in flood relief and coastal protection schemes in response to changing climate patterns.
- Examining commuter flows and identifying alternative sustainable transport solutions.
- Supporting and investing in the community infrastructure and language of the Gaeltacht region – including roll-out of Techspaces and other economic support programmes.
- Investing in Donegal Regional Airport (under that capital an operational support schemes under the Regional Airports Programme 2015-2019).
- Developing a network of greenways between Donegal and Derry City/Strabane that widens the activity-based tourism offering to local and international visitors (as well as benefits this will bring to overall health and well-being).

## **7.0 Section 7: Enabling the Vision- Implementing the National Planning Framework**

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

The North West model – based on place-based leadership – identifies three key regional growth pillars with specific goals/objectives under each. This work will be structured around and focused on an outcomes-led approach to growth and development for Letterkenny, Derry-Londonderry and the wider City Region.

There is a recognised need to move away from silo working across all levels of government – this often requires a culture change within organisations and can take time to achieve.

Potential barriers and risks to implementation are mainly lack of understanding of not only the core objectives of the NPF and their inter-relationship between spatial planning and other sectors such as economic growth, connectivity, environmental management and health and well-being. Indeed, there is a clear need for much more action research that is aimed at the general public and which details the inter-relationship and resulting good and bad practices under certain conditions - especially as it relates to health and well-being. Lack of strong leadership is a further challenge to the implementation of the NPF; with again a clear need for investment in capacity building in this area. Such capacity building includes a focus on coordinated approaches to balanced regional development that is also sustainable, and which ensures that this type of coordination can happen alongside normal business. Any change must be gradual and become integrated into normal business. And where necessary this should be incentivised and built in programmes of continued professional development.

**key indicators for measuring the successful implementation of the NPF include:**

- No. of shared transboundary area development plans created
- Increased frequency of flights to regional airports
- Creation of tech-spaces / incubation hubs outside of cities
- Number of shared catchment management plans
- Evidence of multi-agency and multi-disciplinary governance arrangements in support of such plans and strategies
- Population growth incl. spread across regions
- SME growth
- SME expansion into export markets
- Increased R&D between education bodies and companies
- Improved population health outcomes
- Employment growth
- Reduced carbon emissions
- % increase in energy coming from renewables
- Population transfer or changes viz. urban/rural?

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

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## **Appendix 1: The North West Regional Development Group**

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

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

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

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