

Ireland 2040: Our Pan – Issues and Choices

Written Response by Derry City & Strabane District Council

1. Introduction

Derry City & Strabane District Council (hereinafter referred to as DCSDC) welcomes the opportunity to make a formal submission to the current consultation process relating to *Ireland 2040: Our Plan – Issues & Choices*. DCSDC is mindful of this document and process being commonly referred to as the National Planning Framework (NPF). Accordingly, and for the purposes of this consultation response, the *Ireland 2040: Our Plan – Issues & Choices* will be referenced as NPF within the context of this response.

It is important to point out that DCSDC has separately developed a joint response to the NPF with its cross-border local authority partner Donegal County Council, under the auspices of the North West Regional Development Group (NWRDG). The NWRDG is a newly constituted collaborative structure established to enable both Councils to respond in a fully coordinated way, in order to promote and develop opportunities for cooperation, development & investment relative to the North West City Region.

As co-author of the response to the NPF prepared by the NWRDG, DCSDC fully supports and endorses its contents. This response aligns with all of the key issues presented within the document prepared by the NWRDG.

2. Derry City & Strabane District Council Overview

DCSDC is one of the eleven new Northern Ireland Council districts formed in April 2015. DCSDC represents the new local authority encompassing the former Derry City Council and Strabane District Council areas. The formation of the new local authority structures has also involved the transfer of powers/functions that previously rested with Central Government. These include land-use planning, economic development, community planning, tourism and off-street parking. Within the context of the new local authority structures, DCSDC is equipped with what it considers to be a broad range of powers/functions that are critical in its efforts in promoting the social, economic and physical wellbeing of its District and region.

DCSDC's new expanded boundary comprises of 1,342 sq.km and sharing a land border with Donegal County Council. Within its District are two major urban conurbations, namely Derry City and Strabane Town, with both locations having direct road connections to the Donegal border. Derry itself is the fourth largest City on the island of Ireland with an urban population in excess of 100,000. Over the NPF

plan period, current projections are that the population of Derry is expected to grow by at least 10,000.

Both Derry and Strabane perform key roles and functions for its immediate and surrounding populations, including neighbouring Donegal, across a number of core service areas economically, administratively and socially. This is evidenced in the number of people who travel regularly from Donegal to Derry and Strabane, for the purposes of employment as well as availing of a range of services including education, administration, and shopping etc.

From a North-West of Ireland perspective, Derry is recognised as a regional City capable of servicing the needs of not only its District Council area, but beyond these boundaries and extending into counties Derry, Donegal and Tyrone. Within the context of the Regional Development Strategy (RDS) for Northern Ireland 2035, Derry's role as a centre strategically serving the entire North West City Region is further reinforced. The RDS acknowledges Derry's infrastructure in terms of its economic, education, health and transportation provision through its designation as a 'Regional Gateway City'.

Policy SFG 6 of the RDS entitled *Develop a Strong North West* advocates ensuring high levels of cooperation between Derry & Donegal in terms of it helping to 'unlock the potential of the North West'. Accordingly, both DCSDC and Donegal County Council remain committed promoting the sustainable growth and prosperity of North West City Region through the recently constituted forum of the NWRDG.

3. Emerging DCSDC Strategic Policy Frameworks

DCSDC is currently in the process of preparing key strategic policy frameworks in terms of its local Community Plan and the Local Development Plan (LDP). The Community Plan has involved an extensive consultation process engaging a broad range of local, regional and national stakeholders with the objective of setting out the core objectives in improving the economic, social and physical well-being of the Council district. This document is due for completion in late 2017 and will be the guiding regeneration policy framework for the next 5-10 years.

The LDP process is at an early stage and will set out the District's land-use planning policies up to the period 2032. Essentially, the LDP will serve as the spatial representation of the Community Plan through the development of relevant planning policies, zonings and designations.

Embedded within both policy frameworks are the principles of promoting a strong and vibrant North West City Region. Both documents will set out in their own respective ways, policies and initiatives that will contribute to this strategic objective.

DCSDC considers that the timescales relating to both these key policy frameworks are such that they have the potential to compliment and align with relevant policies emerging from the NPF. DCSDC supports continued active engagement with officials from DHPCLG in ensuring that there is maximum (two-way) alignment between the NPF and Council's Community Plan and Local Development Plan.

4. Comments on the National Planning Framework

As previously alluded, DCSDC had jointly prepared a consultation response to the NPF in conjunction with Donegal County Council – under the auspices of the NWRDG. The following is a brief summary which sets out DCSDC's observations /commentary in relation to the NPF;

Context

Derry is the third largest city whose urban population falls within the NPF and the fourth largest urban agglomeration on the island of Ireland. Therefore Derry and the wider North West City Region is thus a sub-regional economic driver for both jurisdictions. 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.

DCSDC and its partner Donegal County Council are committed to taking a lead in the future development of the region and supporting the strategic priorities of central government. Accordingly, three objectives under which a range of strategic projects will be delivered over the short to medium-term have been set out, namely;

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 City 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 City 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 4th 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 City 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 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 at its core - as the third largest city within the NPF jurisdiction after Dublin and Cork.

General Observations

- 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 City is not named in the maps within the Issues Paper. Council would hope that this will be rectified in any future drafts.
- The presentation and wording in this section of the document would appear to be inconsistent with the Irish Government's overall statement of intent as to the significance of a 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 to the National Spatial Strategy.
- The North West City 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 trans-frontier population and economic activity in terms of settlement patterns, movement of workforce or business growth.
- With reference to Section 2.4.8, DCSDC endorses the concept of an NPF being a statutory document, and also the importance of alignment of implementation with public and private investment supports. DCSDC agrees that it should address all parts of Ireland. Council also agrees 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 DCSDC believes that diversity of approach to different regions including Derry/the North West City Region will be the key to releasing the full potential of an NPF. This is particularly important given the likely challenges that Brexit will present for both economies.
- DCSDC welcomes the emphasis placed on population health and wellbeing. Indeed, the North West City Region has provided significant leadership in the development of built environment approaches to population health.
- The theme of place-making has been central to the collaborative processes underway in the North West. DCSDC welcomes the inclusion of this theme as a core element of the NPF Issues paper. DCSDC acknowledges that a more balanced picture of island-based growth emerges when Derry City 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 Derry/the North West City Region, whose functional territory and immediate hinterland is cross-border in nature.

- The maps in Section 2 and 3 are disappointing as they fail to capture the inter-relationships between settlements, North and South; with Northern Ireland being left blank. DCSDC 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. In the case of the North West City Region, such referencing would highlight the additional advantages to the wider Northern and Western Region of having an additional cross-border dimension that includes Derry City as the third largest city with an immediate functional territory which lies within the NPF jurisdiction, and the fourth largest city on the island.
- DCSDC considers 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 extending into Donegal, and the work to date by both 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 Derry/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.
- DCSDC believes 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. 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 Derry/the North West City 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.
- The NPF must recognise the need for infrastructure development at Greencastle to support significant ship access to the Foyle, and boost regional tourism product for Derry and Donegal

Proposed Policy Considerations

Policies that the NPF should include to effect nationally strategic infrastructural priorities include supporting (a) the growth of Derry/the North West City Region and (b) the revitalisation of smaller towns and villages and build the resilience of rural areas are as follows;

- Completion of the A5/N2 dual carriageway system from Dublin to Derry City/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 City 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 City to the M22/M2 to Belfast and to join with existing dualled/motorway provision.
- Widening of the A2 Buncrana Road, Derry City, to four lanes between Pennyburn Roundabout and the County Donegal border (two lanes in each direction).
- Regeneration of Derry's Waterside Railway 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.
- 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.
- 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 the benefits this will bring to overall health and well-being).

5. Summary

By means of summary/conclusion, DCSDC sets out the following key matters for further consideration. DCSDC acknowledges the engagement and cooperation to date with officials from the Department of Housing, Planning Community and Local Government throughout the preparation and consultation processes of the 'Ireland 2040 Our Plan'. DCSDC welcomes future opportunities for engagement and dialogue with the Department during the next stages of the process.

Summary of Key Points – The North West City Region and the NPF

- This is a cross border Region with Derry City 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 new arrangements to support the growth of the North West City Region, which are supported by the Irish Government, have taken on an additional significance for the economy and sustainable development of the island as a whole, in the light of the decision by the UK to leave the EU; effective implementation of an NPF which includes Derry City as the third largest city whose immediate hinterland lies within the NPF will have national significance;
- Derry City is the fourth largest city on the island of Ireland.
- A more balanced picture of island-based growth emerges when Derry City is included.
- 35% of the population of Derry/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;
- There needs to be a shift in high-level thinking relating to Derry/the North West City Region 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 shift is currently being

facilitated through the new structures for the North West City Region and this outcomes-led work will continue into the future.

- A tailored approach to the North West City 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.
- Derry/the North West City 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.
- Derry/the North West City Region has developed collaborative working structures which are interjurisdictional and which can facilitate innovative shared approaches to implementing best practice in spatial planning in the context of an NPF.
- The North West City Region has a number of key infrastructural investment priorities which are highlighted in this paper which will support its potential as a viable and attractive regional complement to Dublin.