

**From:** Pat McCloughan [REDACTED]  
**Sent:** 27 October 2017 10:50  
**To:** National Planning Framework  
**Subject:** PMCA Submission  
**Attachments:** PMCA Economic Consulting Submission on the Draft NPF Oct 2017.pdf

Dear Sir/Madam,

Please find attached PMCA's submission on the draft NPF for your consideration.

I hope you will find it helpful and constructive.

Kind regards,

Pat

**Dr. Pat McCloughan**



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# Submission to the Draft National Planning Framework *Ireland 2040 Our Plan*

27 October 2017

## Introduction

This submission is prepared by PMCA Economic Consulting in response to the draft National Planning Framework (NPF), entitled 'Ireland 2040 Our Plan', published by the Government on 26 September 2017. PMCA welcomes the opportunity to submit views on this important document and the following material is designed to be constructive and helpful in finalising the NPF. PMCA's interest in the process stems from the firm's work with local authorities in preparing and appraising economic development plans and similar assignments, which are very rewarding owing to the successful outcomes achieved by councils benefitting from the unique insights and services of PMCA.

## Comments on the Draft NPF

### *The Importance of Coherent RSEs*

The NPF is a high-level document, which outlines broad principles in respect of the future planning of the country, with due emphasis on sustainable development. Key to the implementation of the new plan will be the drawing up and implementation of the Regional Spatial and Economic Strategies (RSEs), which will replace the Regional Planning Guidelines. The RSEs will be overseen by the new Regional Assemblies, taking due account of local authorities' respective County Development Plans (CDPs) and LECs (Local Economic and Community Plans), which have, or will have been, put together with the inputs of local residents, communities and businesses. The specification and application of the new RSEs will no doubt be a complex task, not least because of the diversity among counties *within* the three new Regional Assembly areas. PMCA notes that the map showing the new Regional Assembly areas on page 34 of the draft NPF does not show the Strategic Planning Areas (SPAs) within each of the new regional areas. This might be clarified/corrected in the final version of the NPF, for the avoidance of any doubt or confusion about the existence of the SPAs within each new Regional Assembly area.

### *The Very Long-Term Nature of the Planning Horizon in the NPF*

The planning horizon in the NPF goes up to 2040, which is more than 20 years out from currently. This is too long a time horizon to make sensible or practical projections regarding population or employment changes. Almost certainly the projections outlined in the draft NPF will be overtaken by events, likely sooner rather than later. The former National Spatial Strategy (NSS) had a planning timeframe of 20 years (2002-2022) but has become obsolete. In view of the lessons learned from previously, the final NPF should make it clear that any economic or other/related projections are illustrative, intended as a guide to inform overall planning rather than definitive.

### *The Government's Capital Plan*

It is understood that the Government will publish a capital investment plan before the end of the year that will run for a period of 10 years. It may therefore make sense for the final NPF, and the subsequent RSEs, to be aligned with the new capital plan and to run for the same period.

### ***The Importance of Jobs/Employment***

There seems to be a view in Government, and the media, that the battle for jobs has been won. Nothing could be further from the truth. Given Brexit and other international uncertainties, and threats to the State's economic model in respect of attracting foreign direct investment (FDI), even though the State will continue to have sovereignty over its corporation tax rate, Ireland cannot afford to ease up on the creation and sustenance of employment. The battle to maintain or enhance competitiveness and employment is ongoing, cutting across all economic sectors and policy areas, and the NPF, and the RSEs, need to be ever mindful of this policy imperative.

### ***The Importance of Broadband and Mobile Telecoms in Rural/Intervention Areas***

Of critical importance to the NPF, the capital investment plan, and the RSEs, and local plans, is the delivery of the National Broadband Plan at the earliest opportunity. Achieving this important outcome will make a huge contribution to sustaining and enlivening rural communities throughout the country. Information technology (IT) developments are today driving economic development, and having access to reliable, high-speed broadband is fundamental to that, whether in farming, food production, retailing or professional services. Not only do the 'Intervention Areas' identified in the NBP suffer from a broadband deficit, but they also lack reliable mobile telecoms infrastructure, as anyone will testify from their experiences of trying to use their mobiles in these areas. *The problem is especially acute along the border with NI.* No country or region can be genuinely competitive without proper mobile and broadband services covering the *whole* country, regardless of location or topography. This needs to be a core part of the NPF and the new capital plan.

### ***Working with Our Neighbours***

The Peace Process is the greatest achievement of our generation – from a situation in the 1970s and 1980s that seemed impossible to solve. Maintaining peace and good relations with our neighbours in NI will be fundamentally important in the years ahead, even when the UK eventually leaves the EU, which is regrettable.

The cross-border region in both parts of the island needs to be supported, ideally by the executives in each part of the island agreeing an infrastructural plan – which should be reflected in the new capital plan. It is hoped that the NI Executive will return sooner rather than later, and be working with the authorities in the South to address the infrastructure deficits along the border. It is in both their interests to do so.

Take for example the route between Dublin and the north-west part of the island, one of the most populous parts of the whole island, with dynamic and growing urban centres like Letterkenny, Derry/Londonderry and Omagh, catering for large amounts of FDI as well as indigenous enterprises (and duly credited in the draft NPF). There is significant economic potential in this part of the island.

However, the route between Dublin and the NW (particularly to Letterkenny and Derry/Londonderry) is under-developed, in contrast to the other routes radiating out from Dublin. A case can be advanced for dual carriageway access along the N2 from Dublin, through the AS in Tyrone and on to Derry/Londonderry (via the AS) and Letterkenny (via the N14). This would reduce journey times, traffic accidents and open up the NW region for new investment and tourism (notwithstanding Brexit).

Currently, the NE region between Dublin and Belfast benefits from a continuous dual carriageway (the M1-A1) and is developing into an 'economic corridor', which is welcome. There is a case for the NW to be afforded the same opportunity, like the other corridors in the regions of Ireland.

**Contact Details for PMCA**

Contact details for PMCA are as follows:

