



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

# Draft National Planning Framework – Ireland 2040

SUBMISSION OF DONEGAL COUNTY COUNCIL

November 2017

## SUBMISSION OUTLINE

### DONEGAL AND ITS ROLE IN THE NORTH WEST - AN EFFECTIVE REGION

This submission represents the scope of opinion that has developed in the North West and highlights the opportunities that exist for collaborative regional development and leadership between partner local authorities, agencies, community organisations and the private sector to implement the National Planning Framework.

The challenges facing the County, including those potential threats from Brexit that are yet to fully materialise, are significant. The opportunity arises through a determined strategy for growth that has received cross-border support from across the spectrum of political opinion and is being actively pursued as the basis for place-based planning, environmental sustainability, economic development, social cohesion and well-being.

This submission is also made in the context of the earlier submission of Donegal County Council<sup>1</sup> that was made as part of the initial phase of consultation in early 2017 associated with the 'Issues & Choices' paper published by Government,<sup>2</sup> and it reinforces the key considerations for County Donegal and the North West set out in that document. The main theme of the submission is to ensure that the strategic approach to regional growth, informed by Donegal County Council and Derry City & Strabane District Council through the North West Regional Development Group and the North West Strategic Growth Partnership, continues to be recognised nationally and that the place-based approach to regional growth shapes strategic investment in the region in a manner that benefits both the State and the community.

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<sup>1</sup> DCC (2017), National Planning Framework – Ireland 2040, Our Plan Issues and Choices. – Submission of Donegal County Council, March 2017,

<sup>2</sup> Department of Housing Planning and Local Government (2017), National Planning Framework – Ireland 2040, Our Plan Issues and Choices.

## 1. KEY MESSAGES

- The strategic value of developing a metropolitan area in the North West border area as a viable focus for effective regional development, in a location that can achieve a critical mass of population to deliver national benefits, is a core aim of this submission. **It is expressly recommended that the North West City Region be provided for within the National Planning Framework as a strategic metropolitan area of value to the sustainable growth of the State.** To enable this potential to build on the attributes, assets and advantages of the North West City Region, and to respond to the impacts of Brexit, investment in access to the North West needs to be ring fenced and prioritised in the National Planning framework.
- **It is recommended that the wider regional population growth targets for the Northern & Western Regional Assembly Area be revised upwards to provide the basis for a future growth of regional population by 175,000 to 200,000.** The deliberate provision for population growth reflects the ongoing wider collaborative leadership in the North West that seeks a durable reshaping of the region where it's potential is deliberately built upon through a determined process of co-invention and co-production.
- In seeking effective regional development where the linkages between regions are also recognised, **it is recommended that the National Planning Framework unequivocally provides for the development of the Atlantic Economic Corridor on both a North-to-South and a South-to-North basis,** recognising that the North West City Region effectively anchors the northern end of the Atlantic Economic Corridor and provides a collaborative basis to respond to the threats from Brexit to the border area.
- **The key strategic infrastructural priorities<sup>3</sup>, that are necessary to support the growth and potential of the North West City Region, should be expressly identified as national priorities through the implementation of the National Planning Framework. These include:**
  - a) The TEN-T strategic roads projects (N13, N14, N15);
  - b) N2/A5 & A6 roads projects linking the region;
  - c) N4 upgrade;
  - d) Continued support for Donegal Airport and City of Derry Airport, and for the key strategic ports of Killybegs and Greencastle;
  - e) Implementation of the National Broadband Plan;
  - f) Upgrade of the strategic electricity transmission network.
- **The recognition of the strong social values that exist in the rural community of Donegal.** The scope of the policy framework indicated in the draft NPF in relation to National Policy Objective 18b in particular, should include

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<sup>3</sup> DCC (2017), National Planning Framework – Ireland 2040, Our Plan Issues and Choices. – Submission of Donegal County Council, March 2017, pp 16-17.

specific reference to the *social* need for housing provision for people to live and work sustainably in Ireland's rural areas.

## 2. CORE SUBMISSIONS OF DONEGAL AND THE NORTH WEST

### 2.1. **The express designation of the North West City Region (Letterkenny-Derry-Strabane) is sought to (a) strengthen its position as a strategic metropolitan area within the National Planning Framework, and (b) to provide a sound basis to mitigate the impacts of Brexit on the North West:**

2.1.1. The strong regional collaboration that manifests itself through the North West Strategic Growth Partnership has created a new, distinct narrative for regional development in the North West. It is a narrative that focuses on place making, investment in strategic infrastructure, social enterprise, health and education collaboration, and the realisation of business opportunities.

2.1.2. As a cross-border region in transition where the effects of Brexit are yet to be realised, it is vital for the region that an all-island approach is taken to recognising the economic potential of the North West City Region as a national driver of importance where the joint actions by Donegal County Council and Derry City & Strabane District Council are the effective basis to mitigate the impact of Brexit. To mobilise the economic and social potential of the North-West it is essential that the North West City Region is explicitly identified by the National Planning Framework to reinforce the effective collaboration of stakeholders in developing a metropolitan area of national scale.

### 2.2. **The provision for a regional population growth target of 175,000 to 200,000 people by 2040:**

2.2.1. The draft National Planning Framework is open to interpretation in relation to the growth figures provided for the region and it is argued that the limitations of the growth figures in the Draft NPF represent a 'business as usual' approach where national investments identified do not adequately provide for place-based sustainable development in the North West. The population growth targets envisaged by the draft NPF do not take account of the robustness of the metropolitan area approach taken by the North West Strategic Growth Partnership. The distinctive strengths of the Letterkenny-Derry/Strabane collaboration provide the basis for deliberately building on the special assets of the region, its attributes and advantages. The place-based leadership of liveable, quality, affordable and sustainable communities (both urban and rural) offers more options for sustainable growth that requires reassessment of the population targets upwards to negate any 'business as usual' tendency and realise the potential of the North West City Region.

- 2.3. The development of the Atlantic Economic Corridor on a north-to-south and south-to-north basis:**
- 2.3.1. The Council recognises a structural weakness in the Draft National Planning framework through the focus in the document on “improving connectivity and accessibility northwards on the emerging Atlantic Economic Corridor”. In adopting this approach the Draft National Planning Framework consigns the accessibility of Donegal and the North West to a timeframe after the city areas have been mobilised. It fails to recognise the unique cross-border driver of growth provided by the North West City Region where the collaboration evident through the North West Strategic Growth Partnership can mitigate threats arising from Brexit and deliberately build on the regions assets, attributes and advantages. It is recommended that there is a requirement, in the context of the clear identification of the North West City Region as a metropolitan area of national significance, to provide for the development of the Atlantic Economic Corridor on a north-to-south basis as well as the south-to-north basis currently presented by the draft NPF. The objectives of enhanced regional accessibility and making stronger metropolitan places should be adjusted to reflect the importance of strategic regional and cross-border growth that is of central importance to County Donegal.
- 2.4. The key strategic infrastructural priorities that have a regional significance in the North West should be expressly identified as national priorities to be supported through the implementation of the National Planning Framework:**
- 2.4.1. To satisfy the terms of Objective 47 “*to promote the development of the North West City Region...*”, and meet the need from a “*joined-up approach to spatial planning*”, and to ensure that the North West can fulfil the Smart Growth objectives of the draft National Planning Framework, the NPF needs to be amended to recognise the metropolitan area potential of the North West City Region through a clear commitment to the development of strategic routes and electricity network improvements into County Donegal. Again, the Draft National Planning Framework presents the development of infrastructure to the North West as conditional on the development of the Atlantic Economic Corridor northwards from Galway. Such an approach would compound a negative ‘business as usual’ approach and inhibit the growth potential of the North West City Region.
- 2.4.2. The strategic infrastructural priorities that are critical to the development of the county and the North West City Region include the upgrade of Ten-T routes (N13/N14/N15), delivery of the A5/N2, N4 upgrade, improvement of access to key ports and airports in the County, essential upgrades to the electricity network, and implementation of the National Broadband Plan.

2.5. **The recognition of the strong social values that exist in the rural community of Donegal:** The scope of the policy framework indicated in the draft NPF (National Policy Objective 18b in particular) should include specific reference to a *social* need to live and work sustainably in a rural area to reflect the diverse rural community structures that exist in the county.

### 3. SUMMARY OF ITEMS TABLED BY COUNCILLORS, WORKSHOP 26TH OCTOBER, 2017:

3.1. Councillors strongly supported the strategic approach taken in reaffirming the importance of the North West City Region in the future growth of the North West. In these detailed discussions, the following specific items were raised for inclusion as part of the Council's submission to the draft NPF:

Item	
1	The potential for Brexit to impact negatively on the work of the North West Strategic Growth Partnership: The identification of the North West City Region as a key metropolitan area in the National Planning Framework was considered as vital to the growth of the north west. The peripherality of the county, the historic impacts of the 177km long border, and systematic underinvestment in infrastructure in the region are cited as a fundamental basis for seeking the explicit inclusion of the cross-border metropolitan area in the National Planning Framework.
2	The social, cultural and linguistic value of An Gaeltacht needs to be strengthened in the National Planning Framework to reflect the unique status and social context of these areas, particularly in the role of enabling growth.
3	The draft National Planning Framework should plot a path to enable the growth of towns to have populations of over 1500. To do this, mechanisms to address existing infrastructural deficits need to be provided.
4	The importance of the County's ports, harbours and airports should be strengthened in the National Planning Framework.
5	The draft National Planning Framework needs to retain the ambition for a rail link to the North West.
6	Objective 18(b) needs additional criteria to reflect the social links and context to meeting genuine rural housing need and protect sustainable rural community development as a counter point to the urban centric approach of the draft National Planning Framework.
7	The strong history of cross-border collaboration in areas of health services, education and employment needs to form part of the argument in favour of the identification of the North West City Region as a metropolitan area of national importance.
8	The development of strategic transport linkages to the north west is

	vital to address historic underinvestment in the region (TEN-T routes, A5/N2) and that this should provide for the extension of the national road network to the strategically important port at Killybegs.
9	It is essential that the collaborative efforts of the Council should extend to and expand to other authorities; especially those abutting the south of the county, and that this approach should be enshrined within the National Planning Framework.

#### 4. CONCLUSION:

- 4.1. This submission rests on the explicit recommendation, as outlined and supported above, that the North West City Region be identified in the National Planning Framework as one of the island's key metropolitan areas.
- 4.2. Along the 177kms of the border between County Donegal and its neighbouring authorities, the urgent imperative presented by Brexit reinforces the strategic benefits of designating Letterkenny-Derry/Strabane as the North West City Region with a strong economic, social and environmental cross-border territory that is an important driver of both regional and national growth. The capacity evident from the collaborative approach to regional development has been demonstrated by the North West Strategic Growth Partnership where there is the scope for agile responses to, and a durable reshaping of, the needs of the region through coproduction and innovation.
- 4.3. To give effect to the collaborative regional efforts, designation of the North West City Region within the National Planning Framework must be reinforced by the inclusion of the identified strategic infrastructural investments to redress historic underinvestment in conjunction with a national commitment to the implementation of these priorities.