

**Mr Eoghan Murphy TD**  
**Minister for Housing, Planning and Local Government**  
**Custom House,**  
**Dublin, D01 W6X0**

**10/11/2017**

**Subject: Draft National Planning Framework: 'Ireland 2040 – Our Plan'**

**Dear Minister,**

**The American Chamber of Commerce Ireland's priority is that Ireland remains a unique transatlantic trade and investment gateway and a location of choice for US inward investment to Europe.**

**To further that aim the Chamber's vision for the National Planning Framework (NPF) is that Ireland must be recognised within the world's top decile as a place to work and live. This will require a significant uplift in planning activity and capital investment, as outlined in our initial submission to the NPF process ('The Capacity to Grow' Submission to the NPF consultation 31/3/2017).**

**The Chamber welcomes the publication of 'Ireland 2040- Our Plan' as a long-term strategic planning framework for the country to guide planning and the capital investment strategy for the next two decades. Having consulted with the multinational leadership of the Chamber, we welcome several of the strategic recommendations within the draft NPF, including:**

- ☛ the explicit recognition that internationally mobile investment is attracted to environments with a critical mass of available talent and modern infrastructure;**
- that economic development and renewal is to be focused around assessible urban centres of scale, hence greater urban densification and metro transport capacity is required;**
- the identification of specific journey duration and average vehicle speeds to guide the needs of critical regional interconnections to deliver transport investment projects;**

- a new governance for planning that is favourable of accommodation, employment and activity development within existing urban areas;
- the potential of Dublin as Ireland's international flagship is recognised in parallel with the growth potential of Cork, Limerick, Waterford and Galway;
- the recognition of balanced regional development with a focus on Ireland's 41 large towns via a Smart Growth Rural Initiative;
- the explicit recognition of the need to enhance the accessibility of the North-West.

To maintain foreign direct investment (FDI) Ireland must compete based on its available talent pool, innovation and operational track record, and the capacity of its digital and physical infrastructure to support growth linked around a theme of place-making: creating attractive urban/city regions to live, work, retain and attract talent and inward investment. Considering this, the Chamber has identified several areas to improve the suggested framework including:

- **Strengthened Digital Economy:** A more ambitious framework for universal and metropolitan connectivity speeds for next generation services (e.g. universal 10Gbits by 2030);
- **Compact, Smart Growth:** A more explicit recognition of apartment homes and a professionalised rental sector as a critical part of the housing mix in urban centres;
- **Enhanced Regional Accessibility:** Outside the principal urban/city regions, priority commitment should be given to encourage all towns with existing and successful clusters of exporting businesses\*. The framework should act to encourage these clusters of regional growth by signifying that population growth outside the main urban hubs will not be prohibited;
- **Knowledge Capital:** More explicit commitment to new and greater R&D capital investment projects and the needs of the training sector nationally to support life-long learning/reskilling requirements of industry;
- **Innovation:** Explicit recognition that emerging disruptive technology and Innovation has the potential to accelerate the delivery of NPF's National Strategic Outcomes and should be actively explored through the period of the NPF;
- **Timeframe:** Greater sense of prioritisation by way of a broad schedule to accelerate the delivery of the vision of the framework over the period to 2040.

As a strategic document, its success will be dependent on the alignment of its vision with sustained competitiveness over the next decade, the emergence of a more coherent

planning system flowing from national to local and sufficient investment for identified capital projects. Enhancing the attractiveness and viability of second tier towns with established industry, with improved connectivity to larger metropolitan areas, provides useful alternatives in easing some challenges related to scale associated with Dublin.

With respect to the wider “Digital Agenda”, Chamber leadership believes that Ireland should be positioned as a global centre of excellence for the data economy in areas such as digitalisation, advanced manufacturing and artificial intelligence. Core to this ambition is a first-class national broadband network – one with a sustained ambition to deliver universal and metropolitan connectivity speeds for next generation services if Ireland is to become a leader in the Fourth Industrial Revolution. To maximise the alignment of long term economic and industrial planning, the State should actively exploit public-private opportunities for data-driven innovation and world class cloud use, build citizen trust for the use of digitally provided services supported by ubiquitous rapid broadband access.

### Planning Delivery and Flexibility

Ireland’s competitive offering requires the sustained commitment of many government departments, agencies and stakeholders. The NPF must act as national template for planning priorities to guide those planning, delivering and assessing major infrastructure projects that will arise in the coming decades.

In particular, An Bord Pleanála needs to have a spatial policy framework to guide its decision-making process. The American Chamber of Commerce would welcome initiatives to improve the length of time it takes for projects to gain final planning approval to deliver critical projects. The aim should be to benchmark Ireland against other jurisdictions and make proportionate changes to the planning process to narrow that differential.

If projections for economic and population change are accurate, adherence to the Framework is likely to require an acceptance for change. This will exert pressure to respond at times against the long-term and national good. Therefore, the American Chamber supports putting the NPF onto a statutory footing with an effective governance and implementation structure. Such a structure should have progress reporting obligations and compliance should be measured against the stated plan. Departure from the plan by local government, agencies or Government should be reported based on established objective criteria, require justification and attract sanctions to incentivise compliance.

Best practice should be celebrated and recognised in a meaningful manner that encourages civil support and sustained political will for the goals of the Framework. To that end, it will be important that the framework is not seen as ‘doctrine’. Therefore, the American Chamber would welcome a scenario-based approach depending on the developing patterns of economic and population change. During the life of the NPF, reviews might be triggered not by the passage of discreet time intervals alone, but changes to assumptions underlining the analysis and guidance.

The American Chamber promotes policies that enhance Ireland's competitiveness to be the location of choice for US FDI into Europe. Competition for FDI remains intense as investment, rather than trade, emerges as the key driver of the global economy in this century. The Chamber welcomes the opportunity to contribute to the development of the new National Planning Framework and continue to strongly support the process of setting long-term strategic parameters to planning and investment.

Yours Sincerely



Brian Cotter

Public Affairs Director

American Chamber of Commerce Ireland

\* Some towns have established and successful centres for major multinational exporters and should be recognised as a priority within the NPF including – by way of illustration; Clonmel in Tipperary with operations of MSD, Boston Scientific and Abbot Vascular; Ballina in Mayo with Hollister, Lionbridge and Ballina Beverages; Letterkenny in Donegal with Zeus, Pramerica and Optus – and there are others such as Sligo, Wexford, Athlone etc.