



Submission from

Northwest Regional Enterprise Plan to

‘First Revision to the National Planning

Framework (NPF)’

Supported by Donegal County Council, Sligo
County Council, Leitrim County Council

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1. Foreword

This submittal is being made in collaboration with members of the Northwest Regional Enterprise Plan (NW REP) Steering Committee, particularly the agencies of Leitrim County Council, Sligo County Council, Donegal County Council and the Northern and Western Regional Assembly. Each of these agencies are making their own submission which the NW REP supports including the submission made by Donegal County Council in collaboration with Derry/Strabane Council in relation to the Northwest City Region.

This submission will focus on the role the NPF plays in enabling enterprise development in the Northwest Region.

This submission includes high level concerns of the collective agencies in the region and supports/encourages and relies on the forensic analysis done by other agencies in the wider region.

This submission focuses on the concept that the Northwest region needs regional targeting/positive discrimination whilst executing against the national policy objectives in the NPF. This means, for example, whilst “focusing on the timely delivery of enabling infrastructure” (NPO 101) the Northwest is given additional focus in the form of funding and first delivery of projects.

2. The impact of critical enabling Infrastructure in the Northwest on enterprise development

Key message:

The current status of our infrastructure in the Northwest region is impacting our enterprise’s ability to sustain operations and scale as illustrated by the recently published report, funded by the Department of Enterprise, Trade and Employment entitled “The Impact of Infrastructure on enterprises in the Northwest”. The Northwest businesses say accessibility concerns to the region is impacting their ability to attract talent, attract investment and growth opportunities and causing challenging logistics issues. The recently published “Regional Infrastructure Tracker” by the Northern and Western Regional Assembly illustrates the underinvestment – despite the Sligo/Leitrim/Donegal having 5.3% of Irelands population it only gets 2.2% of share of investment in public tenders worth more than 20million euro. This has led the wider Northern and Western region to be within the lowest 20 regions in European Regional Competitiveness Index.

The NPF objectives related to infrastructure delivery (listed below are some) require prioritisation towards the Northwest region in their delivery/planning.

National Policy Objective 6

Accessibility from the north-west of Ireland and between centres of scale separate from Dublin will be significantly improved, focused on cities and larger regionally distributed centres and on key east-west and north-south routes.

National Policy Objective 51

Ensure that the strategic development requirements of Tier 1 and Tier 2 Ports, ports of regional significance, State Fishing Harbours and smaller harbours are addressed as part of Regional Spatial and Economic Strategies, and plans at local level to ensure the effective growth and sustainable development of the city regions and regional and rural areas, including, where appropriate, infrastructure to effectively support the development and maintenance of off-shore renewable electricity generating developments.

National Policy Objective 19

Regional and Local Authorities to identify and quantify locations for strategic employment development, where suitable, in urban and rural areas generally.

National Policy Objective 52

Support the sustainable delivery of port and harbour infrastructure to facilitate the development, maintenance and operation of off-shore renewable electricity generating developments.

National Policy Objective 56

To support, the progressive development of Ireland's offshore renewable energy potential, the sustainable development of enabling onshore infrastructure including domestic and international grid connectivity enhancements, non-grid transmission infrastructure, as well as port infrastructure for the marshalling and assembly of wind turbine components and for the operation and maintenance of offshore renewable energy projects.

National Policy Objective 101

Planning authorities and infrastructure delivery agencies will focus on the timely delivery of enabling infrastructure to priority zoned lands in order to deliver planned growth and development. In addition, to ensure that infill and brownfield lands are being developed and that the compact growth targets set out in NPO 7 - 9 are being achieved, it is also important to develop and implement new approaches to measuring and monitoring compact growth in cities and larger settlements, aligned to greater digitalisation of the planning system.

Amongst others – key projects in the region include upgrades of key **National Road Network (NRN)** transport links such as those along the Atlantic Economic Corridor (and TEN-T Comprehensive Network) with a focus on improving connectivity from Limerick and Galway Cities to the NPF Regional Centres of Sligo and Letterkenny; In Sligo's case, the completion of the N17 Motorway from Tuam to Collooney.

The National Gas Grid does not extend to counties Sligo, Donegal, Leitrim or Roscommon. The absence of piped natural gas undermines these counties competitiveness relative to other parts of Ireland. In addition, the lack of connection to the gas grid is an inhibitor to the attractiveness of the region for the development of biogas / biomethane infrastructure, a sustainable alternative to natural gas. The viability of anaerobic digestion facilities would significantly increase with the option of gas grid connection. Enabling the development of anaerobic digestion facilities would not only provide

renewable gas, but by turning waste into a valuable resource, supports the core principle of an efficient circular economy.

The NW REP recommends the inclusion, in the NPF of the extension of the critically enabling Gas Network infrastructure to the region, to enable the region realise its potential of providing secure, renewable gas to serve the region and beyond, which would position the region to attract investment and drive economic growth. The extension of this critically enabling Gas Network infrastructure would facilitate the delivery of a number of National Policy Objectives in the NPF including No.'s 31, 33 and 71.

The NPF recognises that the accelerated delivery of additional renewable electricity generation is essential for Ireland to meet its climate targets, reduce its greenhouse gas emissions, and improve its energy security by reducing reliance on imported fossil fuels and diversifying its electricity supply. We welcome the commitment to deliver the regional renewable electricity capacity allocations indicated for onshore wind and solar, but these targets will not be achieved without a safe, secure and reliable, high voltage electricity grid network. The underinvestment in this critically enabling infrastructure in the Northern and Western Region has resulted in parts of the existing electricity grid in the region currently at a high risk of overloading, preventing any further capacity in renewable energy generation. Not only are these deficits currently restricting economic development in the region, they pose a risk to supporting the region's transition to a low carbon society, undermining efforts to further develop onshore wind energy, while also restricting opportunities associated with future offshore wind energy developments off the coast of the region.

We welcome the inclusion of National Policy Objective 72 *"Support the development and upgrading of the national electricity grid infrastructure, including to support the delivery of renewable electricity generating development."* The Northwest region has the potential to be leaders in renewable energy generation, which would drive economic growth in the region. The delivery of this critical enabling infrastructure needs to be prioritised in the region to realise this potential.

Alignment to the NDP and the Northwest Region Enterprise Plan:

Action 3.1 of the Northwest Regional Enterprise Plan states to "...work collaboratively with other agencies in order to address the infrastructure deficits within the region". The NW REP is the only region which includes an infrastructure related action due to our unfortunate status as the region without a motorway, without gas, without a rail network to Donegal, without a HV grid.

Recommendations/Asks:

The aforementioned NPF objectives are key to the future economic development (or decline) of the Northwest region. We request a funded region-specific plan is developed for the Northwest region addressing key enabling infrastructure delivery. This requires positive discrimination or regional targeting towards the Northwest region whilst executing against the national policy objectives in the NPF. This means, for example, whilst “focusing on the timely delivery of enabling infrastructure” (NPO 101) the Northwest is given additional focus in the form of funding and first delivery of projects.

Additionally, we recommend the inclusion, in the NPF of the extension of the critically enabling Gas Network infrastructure to Sligo and surrounding counties, to enable the region realise its potential of providing secure, renewable gas to serve the region and beyond

3. The importance of Urban Areas of Scale to enterprise development

Key message:

Recognition of the regional growth centres as key enablers to the enterprise/economic development of the Northwest region is crucial. Recent research by Atlantic Futures project of UCG demonstrates how urban centres are crucial for enterprise growth and clusters of enterprise development/innovation. Due to the key 5 cities in Ireland being below the Galway-Dublin line, focus on supporting the NW growth centres is critical to reaching numerous policy objectives within the NDP. Increased funding to Sligo, Letterkenny and the Northwest City Region to enable the unlocking of their latent ability is key for the enterprise/economic development of the region. Accessible exchequer funding targeting enterprise development is key to this.

The recognition of the Northwest City Region as a key regional growth centre and indeed an emerging city is crucial for the economic development of the region. The National Policy Objective 59 which specifically supports the development of the Northwest City Region is also supported by the Northwest Regional Enterprise Plan, as are all border initiatives – recognising our unique location along the border. As a region, we are calling for the Northwest City Region to be recognised within the NPF national hierarchy of cities/city regions, as the fourth largest urban agglomeration on the island and only city region north of the Galway-Dublin line. This will strengthen the wider region also.

The omission of Carrick on Shannon within the NPF is disappointing. Despite the obvious unique selling points of the town as a gateway town, its accessibility to Dublin, lower cost of living, Carrick on Shannon is not recognised in the NPF revision. In recent years, strategic projects developed by agencies in Leitrim are increasing the offering of Carrick on Shannon as a place to work, live and invest – the Shannon Recreation Campus and the Carrick Campus Business Hub. We note the importance of Carrick is reflected in the RSES as a “Key Town”.

National Policy Objective 5

The regional roles of Athlone in the Midlands, Sligo and Letterkenny in the North-West and the Letterkenny-Derry and Drogheda-Dundalk-Newry cross-border networks will be supported in the relevant Regional Spatial and Economic Strategy and in Regional Enterprise Plans.

National Policy Objective 13

Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.

Promoting centres of urban scale and compact growth within those requires targeting investment in critical **enabling infrastructure** in Regional Centres. For example in Sligo, these types of projects include the Eastern Garavogue Bridge, Public Realm Works within the town centre, redevelopment of brownfield sites (e.g. Docklands, City Campus project, Wine Street Car-park development), expansion of cycleways and walkways throughout the urban area and extending outwards to satellite villages etc.

Alignment to the NDP and the Northwest Region Enterprise Plan:

Strategic Objective 3 of the Northwest Regional Enterprise Plan states to “....promote the Northwest Region as a region to work and invest in”. This is aligned with the support and growth the regional growth towns and the key towns outside of that not recognised by the NPF.

Recommendations/Asks:

Regional growth towns (Letterkenny, Sligo, NW City region) and key towns (Carrick on Shannon) in the Northwest (and the wider Northern and Western NUTS 2 region) need to be prioritized for growth and investment.

4. Serviced Lands

Key message:

The need for strategic serviced land is emerging as a key requirement that has the potential to unlock the enterprise development opportunities in a number of strategic locations around the country. However, the nature of a multi-sectoral development does not lend itself to a single Government department funding line, nor does its business model lend itself to interventions from the likes of HISCO. There is a need for a Serviced Land Initiative fund to assist in procuring, designing and developing landbanks (brown and green field) is required. This will enable the Councils to respond to challenges and opportunities arising in each county.

The role of local authorities in the delivery of serviced lands (for enterprise use and other use) is widely recognised in the NPF objectives as demonstrated below:

National Policy Objective 19

Regional and Local Authorities to identify and quantify locations for strategic employment development, where suitable, in urban and rural areas generally.

National Policy Objective 101

Planning authorities and infrastructure delivery agencies will focus on the timely delivery of enabling infrastructure to priority zoned lands in order to deliver planned growth and development. In addition, to ensure that infill and brownfield lands are being developed and that the compact growth targets set out in NPO 7 - 9 are being achieved, it is also important to develop and implement new approaches to measuring and monitoring compact growth in cities and larger settlements, aligned to greater digitalisation of the planning system.

Alignment to the NDP and the Northwest Region Enterprise Plan:

Action 3.1 of the Northwest Regional Enterprise Plan states to “....work collaboratively with other agencies in order to address the infrastructure deficits within the region”. The NW REP is the only region which includes an infrastructure related action due to our unfortunate status as the region without a motorway, without gas, without a rail network to Donegal, without a HV grid.

Recommendations/Asks:

To realise this, a revolving fund ranging from €10m - €25m, depending on the size of each county and their respective needs, to assist in procuring, designing and developing landbanks (brown and green field) is required. This will enable the Councils to respond to challenges and opportunities arising in each county. While primarily focused on economic activity, associated activation to support affordable housing solutions, other agency needs and necessary public realm is also most likely with such sites, hence the need for a cross Departmental type fund to allow activation in this area.

5. Regional Growth Targets as an enterprise enabler

Key message:

Centres of urban scale and a well distributed population age growth model is well recognised as a foundation for enterprise development. There is a concern upon reading the draft NPF that the targets for population growth in the remaining 4 cities outside of Dublin has been reduced to 40% growth (from 50-60%) which by extension would imply lower targets for regional growth centres and Key Towns in the Northwest region. Currently, the Northwest region's portion of the overall islands population is declining, which suggest more people are locating to other regions than to the NW.

For example, at the moment, the Regional Spatial and Economic Strategy (RSES) – which acts as the regional implementation of the NPF – seeks to deliver population growth of 40% in Sligo Town, Letterkenny and Athlone, with a corresponding growth rate of 30% for the 8 “Key Towns” (i.e. Carrick-on-Shannon etc.). If the proposed population target of 40% is maintained for Galway City – as per the text regarding Table 4.1 of the revised NPF – then some kind of a reduction in ambition for our “Regional Growth Centres” of Sligo Town, Letterkenny and Athlone would be likely, with a similar situation likely for our 8 “Key Towns”. This is based on the fact that it is extremely unlikely that Galway City and the other cities outside of Dublin would be allowed the same population growth target as smaller urban centres such as Letterkenny, Sligo Town and Athlone.

This reduced population growth targets represents a potential dilution of ambition for regional growth which will impact enterprise development significantly in these regions.

Table 4.1 | Ireland 2040: Targeted Pattern of City Population Growth

City	Population 2022	2018 NPF	Population Growth to 2040 ⁶⁰		Minimum Target Population 2040
		% Range 2016-2040	% Range 2022-2040	People	
Dublin - City and Suburbs	1,263,000	20-25%	20-25%	296,000	1,560,000
Cork - City and Suburbs	223,000	50-60%	40%	96,000	320,000
Limerick - City and Suburbs	102,000	50-60%	40%	44,000	150,000
Galway - City and Suburbs	86,000		40%	36,000	122,000
Waterford - City and Suburbs	60,000		40%	28,000	88,000

Alignment to the NDP and the Northwest Region Enterprise Plan:

Strategic Objective 1 of the NW REP is the promotion of entrepreneurship in the region including promoting links with multinational in the region. Population growth is a key enabler of all entrepreneurship activity.

Recommendations/Asks:

The NPF's ambition for regional growth are not reduced in comparison to the 2018 NPF.

6. Investment in Education/Education infrastructure as an enterprise enabler

Key message:

The offering of a university in the Northwest region will represent a milestone and hopefully will reflect a significant shift in economic growth in the region in the future. The presence of a university will add many factors of enterprise development from talent availability, talent upskilling, population growth in young age groups, employment opportunities etc. The counties in the Northwest region represent some of the lowest levels of education in the state. However, per head of capita there is low levels of investment in higher education institutes - between 2013 and 2018, the level of general capital funding provided per undergraduate student enrolled in Higher Education Institutes within the Northern & Western region was €141, below the State average of €197, and the lowest out of all the Irish regions.

In recognition of the Northwest's HEI's as enterprise enablers, we are calling for increased support to the region's Higher Education Institutes in improving their R&D capabilities to attract greater funding levels, including the infrastructure offerings to host these increase R&D projects - increasing the possibility of innovation.

The NPF objectives which support the diversification of rural areas onto innovative sectors will only be supported by increased levels of education investment

National Policy Objective 33

Enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy into new sectors and services, including ICT-based industries and those addressing climate change and sustainability.

Alignment to the NDP and the Northwest Region Enterprise Plan:

Strategic Objective 1 of the NW REP is the promotion of entrepreneurship in the region including promoting links with the tertiary education providers in the region. HEI's are recognised as key enablers of all entrepreneurship activity.

Recommendations/Asks:

In recognition of the Northwest's HEI's as enterprise enablers, we are calling for increased support to the region's Higher Education Institutes in improving their R&D capabilities to attract greater funding levels, increasing the possibility of innovation.