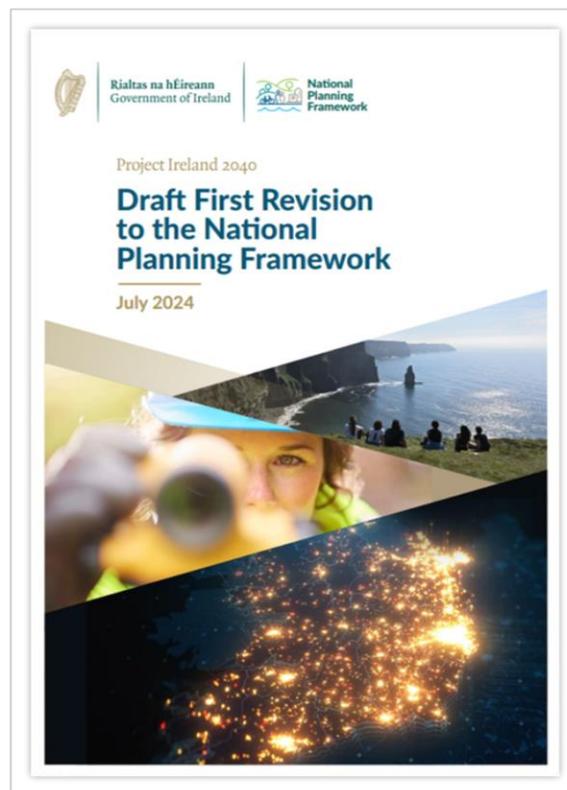




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Dhún na nGall**
Donegal County Council

Project Ireland 2040
Draft First Revision to the National Planning Framework



Submission by Donegal County Council
September 2014



Submission of Donegal County Council

This submission is made by Donegal County Council as it relates to the strategic positioning of the County as a key stakeholder in the effective development of the North West, the Northern & Western Regional Assembly Area, and in the cross-border context of the Northern West City Region.

The submission is made with reference to:

- the Joint Submission by Donegal County Council and Derry City & Strabane District Council as it relates to the North West City Region,
- to the previous submission to the revision process dated January 2024, and
- to the submission of the North and Western Regional Assembly.

1. Context

The Expert Group¹ appointed by the Minister to provide a high-level overview of the NPF in 2023 recommended the need for greater co-ordination at a whole of government level across infrastructure projects and the National Development Plan to ensure proactive commitment to balanced regional development. It states that without this, a ‘business as usual’ approach will still continue to manifest on the ground, with the risk of further regional disparity. OECD also recommends enhanced co-ordination and some risk-taking across government to successfully drive investment and population to the regions. None of these recommendations have been addressed in the Draft Revision and indeed key references to regional development, its significance, and risks of not achieving have been removed. The council contends that this negates the original vision of the NPF as a ‘regions’ focused strategy and its commitment to avoiding the risks from not securing an appropriate and effective regional balance in terms of Ireland’s future economic development.

The Draft Revision does not address the spatial or cross-border dimensions of Strand Two of the Good Friday/Belfast Agreement that still apply, and the challenges posed to these by Brexit. Instead, key references to the impacts of Brexit have been removed, despite concerns raised in the 2023 European Parliament around ongoing and long-term impacts of Brexit on border regions.

In addition, given the significant rural dimension of Donegal, it is a concern that a commitment to ‘reversing’ rural population decline in 2018 has been lowered to ‘addressing’ in the Draft Revision, even whilst recognising that this trend has not improved.

A summary of other key issues is outlined below.

- Based on current trends, the NPF will negatively impact the County and the region. Growth targets for the Northern & Western Region will not be achieved and regional disparity is continuing to widen. Of particular significance in terms of barriers to growth are the infrastructure deficits that continue to undermine the competitiveness of the region and the related lack of housing supply to enable growth.
- NPF recognises the North West City Region in a regional role only (and as a cross-border region) which needs to be elevated in status to reflect both its scale and function. The need for strong and well-functioning cities and city-regions is widely articulated in the Draft Revision and should be reflected through the recognition of the NWCR in the national hierarchy of city-regions and is essential to enable the NWCR to realise its

¹ The Expert Group was appointed by the Minister to provide a high-level overview of the NPF - [report](#) published in 2023

potential both as a net contributor to the economy of the island and as an engine for growth of the wider region.

- There has been very slow progress in improving accessibility from the North West of Ireland. Given the long lead in times for infrastructure investments an expediated timeline is required for enabling infrastructure as well as short- and medium-term proactive measures in the interim to avoid further widening of regional disparity. This requires an explicit investment bias to be contained within any revised NPF.
- The dispersed settlement pattern, lack of sustainable transport options resulting in a high level of car dependency, as well as insufficient water and wastewater capacity (especially in more urban areas of Donegal) is restricting the ability of the Region to meet NPF targets for compact growth and positively contribute to meeting national climate change objectives.
- The NPF identified harnessing the potential of the region for renewable energy as one of the key future priorities for the region, however infrastructure deficits including electricity grid capacity, are undermining the potential and the ability of the Region to harness the highest wind speeds in Europe for offshore renewable energy, reduce heavy reliance on fossil fuels and meet targets for decarbonisation.
- The County and region are currently inhibited by significant barriers for tertiary education institutions, resulting in regional imbalances in knowledge infrastructure. The Draft Revision includes additional references under Chapter 6 in terms of the role of Technological Universities in regions and of the contribution of students to cities/towns but the ability of the County to realise these aspirations is currently severely inhibited, thus further widening regional disparity.

2. *Regional Development:*

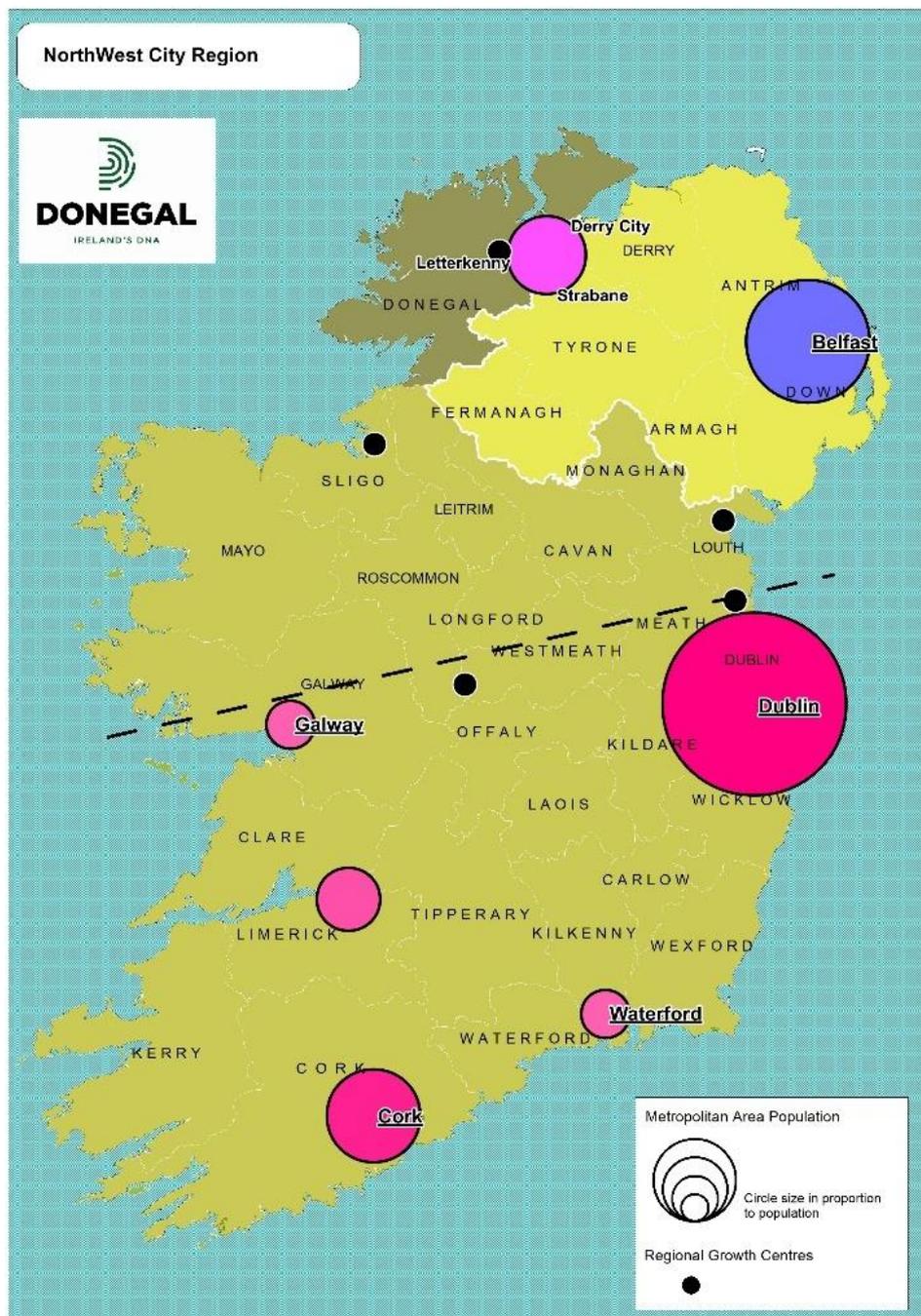
- The Draft Revision acknowledges a continuing trend of the distribution of growth weighted to the Eastern & Midland Region, the lowest rate of growth and redesignation from 'more developed' to 'transition' of the Northern & Western Region, and the Expert Group and OECD recommendations around regional balance. However, it does not address any of these significant developments or recommendations and there are **no measures introduced to address the widening gap or to prioritise key enabling investment** to the North West.
- The Draft Revision appears to **strengthen the status of and prioritise investment in the five cities**. For example, there is the addition of '*Prioritisation of key enabling infrastructure in each region to promote growth where it is required*' (Chapter 2.2) but the only further reference to specific locations for '*critical enabling or strategic infrastructure*' are for Dublin, Cork, Limerick and Galway. Furthermore, a key proposal to accommodate additional projected population growth is through the introduction of '*Transport Orientated Development (TOD)*' which is directed to the five cities with a commitment to accelerated delivery and an indication that these have the potential to locate a significant proportion of future population, housing, employment, services, and amenities.
- The Draft Revision document highlights under Chapter 3 'significant progress' since the adoption of the NPF in 2018 in terms of the introduction of institutional and policy measures aimed at supporting effective regional development (i.e. the RSES, Regional Enterprise Plans and National Smart Specialisation Strategy for Innovation). However, these policy measures are only significant progress if they are backed up by the required capital investment through the NDP and a whole-government co-ordination as recommended by the Expert Group for balanced regional development.

- The Draft Revision has **removed key references to regional development, its significance, and risks of not achieving national objectives**. This negates the original vision of the NPF as a ‘regions’ focused strategy and its commitment to avoiding the risks from not securing an effective regional balance in terms of Ireland’s future economic development. The Expert Group recommended the need for greater co-ordination at a whole government level across infrastructure projects and the NDP to ensure proactive commitment to balanced regional development. Without this, a ‘business as usual’ approach will continue to manifest on the ground, with the risk of further regional disparity. OECD recommended enhanced co-ordination and some risk-taking across government to successfully drive investment and population to the regions.
- The NPF under ‘10.1 Governance and Oversight’ has its opening sentence as ‘*The publication of the NPF in 2018 laid the foundations for balanced regional growth and enhanced regional attractiveness across Ireland*’. The Draft Revision weakens these foundations in terms of strengthening the status of and investment in the five cities, removing key references to the significance of regional development, whilst not introducing any effective measures to address the widening regional imbalance.
- Of particular concern is the removal of two significant paragraphs from Chapter 10.3 *Public Capital Investment* that highlight the significance of regional development given this is within the context of **capital investment** and its acknowledged scope to influence the regional dispersion of economic activity and the rate at which regions accumulate various productive factors, particularly infrastructure.
- There is concern that the revised targets for population growth in the Draft Revision for the four cities outside of Dublin have been reduced to 40% growth (from 50-60%) which by extension would imply lower targets and a knock-on effect for the regional growth centres – this needs to be addressed to avoid a further barrier to regional growth.
- The Draft Revision states (in Chapter 2.4) that the framework maintains the ‘**regional parity**’ approach, and in doing so, the additional population growth projected between 2022 and 2030 will be targeted on a pro-rata basis throughout Ireland. However without any additional measures to address the widening regional imbalance and continuing trend of lower proportionate growth of Northern & Western Region, a trend that will be reinforced by the TOD directing additional growth to the five cities, none of which are north of the Galway to Dublin line, this regional parity will not be achieved and a business as usual approach will continue, to the detriment of the Border sub-region and NWCR more specifically.

3. *City-Region:*

- The NPF had already recognised that the Northern & Western Region justifies a particular focus, due to historically lower level of urbanisation, proximity to the border and risks posed by Brexit and that the ‘five existing cities’ in Ireland are ‘all south of a line from Dublin to Galway’. The **North West City Region presents the opportunity to address this regional imbalance**, recognising it on a par with Limerick, Cork, Waterford and Galway.
- On an all-island basis the NWCR is the fourth largest city region and therefore one of the larger metropolitan areas outside Dublin. It has significant regional influence that merits explicit recognition as a key metropolitan area, **uniquely positioned to play an important role in managed growth and spatial balance** across the island.
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- The need for strong and well-functioning cities and city-regions is widely articulated in the Draft Revision. Recognising the NWCR in the national hierarchy of city-regions is essential to enable the NWCR to realise its potential both as a net contributor to the economy of the island and as an engine for growth of the wider region.
- It appears counter-intuitive to ignore the fact that the NWCR, with the **fourth largest population agglomeration on the entire island of Ireland**, is not recognised within the Draft Revision as an area that has the latent capacity for economic growth subject to the appropriate investment and enabling infrastructure being put in place.



4. *Infrastructure:*

- The **infrastructure deficits** in the Northern & Western Region, further heightened within the Border sub-region, are starkly recognised in the ranking as 17th worst region of the 234 NUTS 2 regions in the Regional Competitiveness Index. This has not been acknowledged in the Draft Revision. This is significant given the compelling evidence (e.g. from EU & OECD) of the role of accessibility and connectivity to a region's value proposition and how infrastructure deficits undermine its competitiveness – and continue therefore to be significant barriers to future growth and to achieving the NPF growth targets.
- There has been very slow progress against NPO 2c (*revised NPO 6*) '*to significantly improve accessibility from the North West of Ireland and between centres of scale separate from Dublin*' and National Strategic Outcome **NSO 2** (*Enhanced Regional Accessibility*). The Draft Revision under '*8.4 Co-ordination of investment*', section on Transport has removed a specific reference to the North West in terms of all forms of transport connectivity – it has been amended to add a reference to the A5 and diluted the reference to the North West to road connectivity only.
- Given the long lead in times for infrastructure investments, an expediated timeline is required for enabling infrastructure as well as short- and medium-term proactive measures in the interim to avoid further widening of regional disparity. This requires an urgent **investment bias**, without which, the NWCR will not be able to achieve its full potential, and Ireland will not deliver on the NPF vision of effective regional development. Furthermore, it will be important to ensure that the NWCR does not lose out to the reduction of overall road **infrastructure investment** in both jurisdictions relative to other types of infrastructure (as part of decarbonisation measures) given the region has not proportionately benefit from previous. Furthermore, this text should be expanded to fully reflect the critical infrastructure requirements across Donegal as:

'Improving inter-urban transport infrastructure, including through a €600m investment in the A5 North-West transport corridor upgrade and advancing on related N2, N14, N14, N15, N56 road upgrades in Monaghan and Donegal, and advancing recommendations in the All-Island Strategic Rail Review, prioritising new rail infrastructure to Donegal'.

Key enabling infrastructure requirements for the County and the Region are identified in **Table 1** below.

- The Draft Revision (Chapter 3.1) includes the addition of increasing emphasis on meeting decarbonisation targets as heightening the importance of achieving more sustainable growth patterns in the regions and cities. However, there is no recognition of the specific challenges for the Northern & Western Region in meeting the **decarbonisation targets** within its context of significant infrastructure deficits and over-reliance on fossil fuels due to historic under-investment in sustainable alternatives. The absence of high-capacity electricity grid connectivity also curtails the ability for electrification to reduce carbon emissions.
- In respect of NSO 4 (*High-Quality International Connectivity*) and reversal of public investment in state-owned commercial ports and airports (with none located in North West), as for the recommended accelerated delivery of the Transport Orientated Development, this may result in potential further diversion of critical infrastructural investment away from the North West, particularly in the context of the current limited capacity to deliver the NDP. The Draft Revision also suggests that renewable energy projects and enabling infrastructure will also be prioritised on the basis of areas that have existing or planned transport corridors: again with the potential to significantly disadvantage the North West.
- The dispersed settlement pattern, lack of sustainable transport options resulting in a high level of car dependency, as well as insufficient water and wastewater capacity is restricting the ability of the Region to meet NPF targets for **compact growth**. There is also a disproportionate level of vacancy and dereliction in the N&W Region which accounts for 40% of the state total. In

addition, measures to activate land for residential development have not yet had limited impact. Letterkenny is the only eligible settlement that falls under the LDA's remit, and no suitable sites have yet been identified or progressed. None of these challenges have been addressed in the Draft Revision.

- Recognising that infrastructure is also more than physical assets and the importance of **'knowledge' infrastructure** (research, education, training, and innovation) to regional development in terms of attracting talent and investment is key. The County is currently negatively affected by a number of significant barriers for higher education institutions, resulting in regional imbalances. The Draft Revision includes additional references under Chapter 6 in terms of the role of TUs in regions and of the contribution of students to cities/towns but the ability of the County to realise these aspirations is currently severely inhibited, for example, by lower capital spend per undergraduate at ATU and current restrictions on professorships, thus further widening regional disparity. As a foundation for this area of knowledge infrastructure it is essential that recognition is given to support the growth of ATU programme of applied research.
- *Enterprise Infrastructure:* Related to the above in terms of 'hard' assets to attract and enable investment and talent, is the development of 'enterprise Infrastructure' to unlock enterprise development opportunities. This includes the need for **serviced land initiatives** in key locations to facilitate economic development and job creation and, where appropriate, associated affordable housing. Support to develop serviced land would address a continuing market failure in this area and provide an opportunity for local authorities to utilise statutory powers, for example, to develop under-utilised landbanks. Funding and support would enable local authorities to invest in utility and access infrastructure required to provide developable ready sites and meet current gaps and unmet demand, including from indigenous businesses unable to grow /scale-up. The role of local authorities in the delivery of serviced lands is already recognised in NPO 19 which could be strengthened by the addition of specific measures to support serviced land initiatives. This key enterprise infrastructure would assist in contributing to regional development/ balance.

This will build on and leverage the impact of current plans to develop enterprise infrastructure through the proposed Business and Innovation Campus in Letterkenny (Alpha Beta Innovation Centre). The project aims to develop dedicated space and create an innovative ecosystem to increase levels of innovation capacity and entrepreneurship in the region with a view to improving the international competitiveness and resilience of businesses in responding to a range of market challenges. It will facilitate greater collaboration and clustering between indigenous and FDI companies as well as with academia, along with retaining talent in the region and creating a high-quality employment opportunity to attract a highly skilled and talented workforce to the region.

TABLE 1: Summary list of key enabling infrastructure requirements of the County and the Region:

	TYPE	PRIORITY PROJECTS
TRANSPORT	Road	<ul style="list-style-type: none"> • N2/A5: Dublin to Derry • N13/A2: Letterkenny to Derry • Donegal Ten-T Projects (N14/A5 link, N56/N13 and N15/N13) • A6: Derry to Belfast (Phase 2) • N56: Inver to Killybegs • N13: Stranorlar to Letterkenny
	Rail	<p>To reintegrate North West into National Rail Network:</p> <ul style="list-style-type: none"> • Dublin to Derry – Derry to Letterkenny • Derry to Belfast (phase 3) • Letterkenny to Sligo
	Ports	<p>Strategic harbour/port infrastructure at:</p> <ul style="list-style-type: none"> • Killybegs Port (and designation as part of EU’s Ten-T Comprehensive Ports) • Foyle Port
	Air	<p>Donegal Airport and City of Derry Airports:</p> <ul style="list-style-type: none"> • Prioritised investment in safety, security, operational and capital infrastructure • Continued support of PSO to maintain and enhance services (particularly to Dublin & London)
ENERGY	Electricity	<ul style="list-style-type: none"> • High capacity electricity grid network upgrade
	Gas	<ul style="list-style-type: none"> • Extension of gas network into Donegal
WATER	Water & Wastewater	<ul style="list-style-type: none"> • Network and treatment plant upgrades to meet key growth needs across settlements in Donegal for both water and waste water
KNOWLEDGE	Tertiary Education	<ul style="list-style-type: none"> • ATU Letterkenny Campus - library, IT and education building • Ulster University Derry-Londonderry Campus - expansion to 10,000 students
	R&D/Innovation	<ul style="list-style-type: none"> • Business & Innovation Campus in Letterkenny including Alpha Beta Innovation Centre • ATU Ocean Innovation Centre, Killybegs
DIGITA	Digital connectivity	<ul style="list-style-type: none"> • 100% fibre roll out to homes/businesses • 100% mobile phone/ Wi-Fi coverage to homes/businesses
ENTERPRISE	Serviced Land	<ul style="list-style-type: none"> • Pilot programme to develop serviced land initiatives in key locations, with the capability to drive economic development and job creation

5 *Trans-Boundary / Brexit:*

- **Border regions** in general experience higher levels of deprivation, peripherality and health inequalities as a result of their distance from the centres of decision making and the frequent experience of historical underinvestment. For the NWCR in particular, this has been exacerbated by the Troubles and disproportionately impacted by **Brexit**, further emphasising existing weaknesses and heightening the impact of under-investment. The NWCR has the largest concentration of the overall border region population whilst both local authority areas have the lowest disposable income per capita in their respective jurisdictions. The report commissioned by the European Parliament in 2023 on the impact of Brexit on border regions highlights their vulnerability particularly when already lagging behind the rest of Ireland, with a concern that already deprived areas will see a further decline.
- This has not been addressed in the Draft Revision and indeed **key references to the impacts of Brexit have been removed**. Of particular concern are the removal of these from the National Strategic Outcomes (NSOs) in NSO 2 (*Enhanced Regional Accessibility*); NSO 4 (*High-Quality International Connectivity*) and NSO 6 (*A Strong Economy Supported by Enterprise, Innovation & Skills*).
- The Draft Revision under 8.3 '*Working Together for Economic Advantage*' sets out NPF support under three main **cross-border areas** – the Dublin-Belfast Economic Corridor and East Border Region; North-West Strategic Growth Partnership; and Central Border Area. However there is a difference in approach between the areas in terms of NPF support and commitment which needs to be consistent. For example, NPO 59 for NWCR refers to support for structures and joined up approach to spatial planning, whereas NPO 58 for the Dublin-Belfast Corridor is more specific in its commitment to supporting and developing economic potential as well as promoting international visibility, when this should also be a priority for the border area in the NWCR.

6. *Maritime Economy & Renewable Energy:*

- The maritime economy is of relevance to the County, given over 1,000km of coastline. Brexit has had a significant and disproportionate impact on coastal communities, particularly in Donegal. However, this has not been reflected in the Draft Revision and a key reference relating to the **maritime economy** as a key enabler of effective regional development has been removed in Chapter 7.
- The European Parliament's report on the impact of Brexit on border regions highlighted current regional **disparities in connectivity in electricity grids and gas** on the island of Ireland – particularly for the North West. The NPF identified harnessing the potential of the Northern & Western Region for renewable energy as one of the key future priorities for the region (chapter 3), however, a reference to its importance for regional development has been removed in the Draft Revision (chapter 7).
- The County, as one of the highest wind speeds in Europe and with a deep-water ports at Killybegs, has huge potential for **off-shore renewable energy**. However, this is significantly curtailed by the absence of high-capacity connectivity to the national electricity grid. Opportunities for investment in large scale offshore energy are therefore being curtailed in what otherwise could be a hugely beneficial sector to the economy of the State and the Region. In addition, the absence of any gas pipeline network in Donegal (and limited supply in the DCSDC area) will inhibit the future development of renewable gases transported via the gas network. In terms of regional attractiveness, it is important to note that energy costs and lack of options continue to be a key deterrent in attracting FDI.

- As there are no **ports** in tier 1, 2 or of regional significance north of the line from Dublin to Galway, the North West is disadvantaged in terms of the strategic importance of the recognised ports and their ability to support balanced regional development. The Draft Revision recognises that ‘ports in our regions have a natural advantage with proximity to potential offshore renewable energy locations and will play a critical role in the sector’. However, without the required infrastructure at and to ports, and grid connectivity, this natural advantage cannot be fully realised.

7. Rural Population:

- The Draft Revision does not address the continuing trend of **rural population decline**, reinforcing the focus of the NPF revision on the five cities. In particular, it is a concern that a commitment to ‘reversing’ rural population decline in 2018 has now been lowered to ‘addressing’ in Chapter 2.
- NPO 29 (*revised NPO 40*) (Gaeltacht) and challenges in respect of the Gaeltacht areas along with the special considerations required for spatial planning and infrastructure investment to reverse population decline and enable growth, as prerequisites to enable preservation of the language and increase usage, have not been addressed in the Draft Revision. NPO40 therefore needs to go further than only supporting the implementation of language plans and should identify the strategic need for positive policy intervention in Gaeltacht Areas.

8. Concluding Remarks and Recommendations:

The durable growth and rebalancing of regional attractiveness on the island is driven by multi-level governance. It is argued that the positioning of the County, and the North West City Region as a metropolitan growth driver influencing prosperity in both jurisdictions, is a necessary step for the future. The collaborative structures that already exist are a firm foundation to enhance the region’s attractiveness and capacity to deliver for our citizens. There is no single solution that can be presented for each regional context but being enabled to function as a place-of-scale can deliver for the County and city region. Here, in this place, the structures have matured and are in a strong position to implement the necessary priority investments in infrastructure, education, transport, housing, and quality-of-life, that are needed to enhance the attractiveness of the wider North West. The cross-border collaborative structures provide the basis for the alignment of spatial and economic planning on a non-statutory basis and to advancing the latent potential of this region. In this governance context the unambiguous recognition of, and investment in, the Derry/Letterkenny North West City Region by Government is essential.

This unique position is the region’s enabling proposition to the current revision of Ireland 2040: National Planning Framework.

To address the issues identified above, the key recommendations of this submission by Donegal County Council are as follows:

1. To recognise the **North West City Region within the NPF national hierarchy of cities/** city regions on a par with Galway, Limerick and Waterford - and to support the development of a related Metropolitan Area Spatial Strategy and Metropolitan Area Transport Strategy. It is recommended that the Derry/Letterkenny North West City Region continues to be framed by NPO 45 (or its next iteration) and its stated approach to spatial planning.
2. To further strengthen the role of **Letterkenny as a key Regional Growth Centre** in the Northern and Western Region as well as its dual role as a critical part of the North West City Region. The NPF

Revision should include the addition of a dedicated section for each regional centre to set out critical enabling infrastructure and investment requirements, as for the approach for the five cities.

3. Support the growth of Atlantic Technological University programme of applied research.
4. To specifically identify and prioritise **enabling and critical infrastructure** for the County in the NPF Revision to ensure there is an investment bias and an expediated timeline for delivery, with short- and medium-term proactive measures to avoid further widening of regional disparity in the intervening period. Ensure that the revision of the NPF enables sustainable investment into the key transport investment priorities for the Derry/Letterkenny North West City Region, including the main transport corridors (A5/N2, A6, and the Ten-T network improvements) the need for which is well documented and rehearsed in a number of strategic policy documents including the NPF and the RSES, further integration of transport and mobility networks, and enabling investment in the two regional airports, Foyle Port, Killybegs Harbour and Greencastle port, and the expansion of rail services into the north west.
5. To support the establishment of a dedicated **Economic Task Force** to address legacy issues and infrastructure deficits, taking account of the strategic strengths and comparative advantages of the NWCR, to evaluate the economic development potential of the city-region, determine how this can be realised in a sustainable way that will see the NWCR as a net contributor to the all-island economy.
6. To re-insert key references to **regional development** that have been removed from the Draft Revision and address related recommendations of the Expert Group and OECD.
7. To re-insert key references to **Brexit** that have been removed from the Draft Revision and address the spatial/ cross-border implications of the Good Friday Agreement and recommendations of the European Parliament, that have not been addressed in the Draft Revision.
8. To revise Chapter 8 (and NPO59) to ensure a consistency in approach in terms of how the North West City Region is referenced and supported as a **trans-boundary region**.
9. To re-insert a commitment to reversing **rural population decline** and specifically address cultural, economic, and spatial issues of Gaeltacht areas.
10. Identify further the interrelationship with the development of the Atlantic Economic Corridor northwards to functionally link with the Derry/Letterkenny North West City Region as a key aspect to the success of any regionally focused approach to national growth and to clearly position the NWCR as a net contributor to the economies of Ireland and Northern Ireland and adding value to the economy of the island.
11. It is recommended that the Revision includes additional measures to address the need for enterprise infrastructure, to include the development of **serviced lands initiatives** in key locations, with the capability to drive economic development and job creation. This should be incorporated into NPO 19.