

Submission on the Draft First Revision to the National Planning Framework

I wish to make the following submission in relation the Draft First Revision of the National Planning Framework.

Section 1 The Vision (National Strategic Outcomes)

I wholly support the retention of the existing National Strategic Outcomes (NSOs) of Compact Growth, Enhanced, Regional Accessibility, Sustainable Mobility etc as core principles of Proper Planning and Sustainable Development and critical national planning priorities. In this regard Compact Growth is essential to achieve vibrant, liveable, and sustainably accessible urban areas and has a symbiotic relationship with sustainable mobility. I also welcome the retention of the Regional Accessibility NSO and the explicit reference to access to the Northwest (Donegal/Derry) which has long suffered from a lack of, and regional inequality in, proper road and rail access.

Section 2 A New Way Forward and Section 3 Effective Regional Development

I welcome the ambition to target a greater level of growth in the Northern and Western region (Section 2.2), and both the acknowledgement of the challenges in (low level of urbanisation and growth) and the imperative of building up the strength of said Region Section 3.3. However, I would contend that:

- Section 2.1 Realising Potential and Potential (P.15), the Donegal sub section (P.35) and the Future Planning Place-making policies priorities (P.37) also need to:
 - Specifically cite the critical need for the TEN-T Priority Route Improvement Project, Donegal (PRIPD), the A5 upgrade and the new rail links to the northwest (Portadown to Letterkenny/Derry) identified in the All-Ireland Rail Review in providing enhanced connectivity between Donegal and other regions on the Island.
 - Place greater Emphasis on Letterkenny (the largest town in Connacht/Ulster outside of Galway City) role as a Regional Centre both in its own right and as part of the wider North West City Region. Including stressing its function a key regional growth/employment driver, and service centre, whilst acknowledging the need for significant investment in housing, transport and urban regeneration to fulfil its potential. It would also be logical Letterkenny immediately after Galway in various section of the document.
- The document might also be restructured to mention the Northern and Western region before the Eastern Region to demonstrate the NPF's commitment to more balanced regional development.

Section 5 Planning for Diverse Rural Places

I commend the support for Rural Towns as local drivers for their surrounding areas and the associated NPOs related to town centre vacancy/regeneration, protection of heritage assets, and serviced sites (NPOs 25-28 refer).

I also support the **NPO 29** (P.71) in relation to managing rural housing in areas under Urban Influence based on a demonstratable economic and social need. However, it is crucial that this policy measure is robustly implemented (as in some areas this is not currently the case). As such I would request that the following text is added to the preceding paragraph ([new text in blue](#)).

It will continue to be necessary to demonstrate a functional economic or social requirement for housing need ([through documentary evidence](#)) in areas under urban influence

The support for the diversification of the rural economy into new sectors and services in **NPO33** (P.74) is undoubtedly important. However, it is crucial that this support aligns with the NSOs of

Compact Growth and Sustainable Mobility, the Town Centre First policy and the NPF's other NPOs in relation to the regeneration of our rural towns and villages. Currently NPO33 provides no locational guidance on such new sectors and services. Consequently, I believe this NPO should be amended to read (new text in blue):

The diversification of the rural economy into new sectors and services, including ICT-based industries and those addressing climate change and sustainability with a primary focus on rural towns and villages.

Section 7 Realising Our Island and Marine Potential

Section 7.3 Ports (P.102) cites 5 ports all of which occur in the southern half of the Country. This section also needs to:

- Support the development of Killybegs Harbour (with a strategically located 12m deep water allweather quay) as a centre for Offshore Renewable Energy (including operations and maintenance), a marine logistics hub for onshore wind energy and for cruise ship tourism.
- Acknowledge the cross-border role of Foyle Port as a key infrastructural asset, marine gateway, and economic enabler for the North-West City Region.

Section 8 Working with Our Neighbours

I wholly support the crucial section on the North West City Region. However, it is imperative that the reference to rail infrastructure in the 3rd bullet point be strengthened on foot of the publication of the All-Ireland Rail Review as follows (new text in blue) (~~deletions in red strikethrough~~):

Improving inter-urban transport infrastructure, including through a €600m investment in the A5 North-West transport corridor upgrade and advancing on related N2 and road upgrades in Monaghan and Donegal, and ~~examining~~ implementing the recommendations in the ~~Draft~~ All-Island Strategic Rail Review; ~~and in relation to the provision of new rail lines to Derry and Letterkenny.~~

Other Ancillary Points

- Front Cover: The nighttime satellite image of Ireland on the front cover excludes Donegal and northwest Mayo. I believe that a national document should include an image of the whole Island. In addition, as the front page of the original NPF also included an image from the Southern Region perhaps an image from another region could be used in this revision.
- The Vision Cover Page Graphic: I welcome the inclusion of a Donegal image. However, the chosen image looks towards area of rural housing sprawl on the outskirts of Letterkenny which is inconsistent with the NPF's key messages/vision.
- Please feel free to use my images attached to this submission in the NPF.

Kind Regards

John McFeely

[redacted information – personal]

25/08/24

