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Letterkenny Chamber Observations on the Draft First
Revision to the National Planning Framework

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Draft First Revision to the National Planning
Framework

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Observations:

1. The Vision

Chapter: 1. The Vision

While the shared vision in this Document is the Governments' high level strategic plan for shaping the future development and growth out to 2040 is laudable, we now have only 16 years left of this strategy to make this shared vision a reality. A shared vision should be felt across the country; however our members and this chamber are not experiencing equal investment across the island.

We represent members across Donegal and the Northwest and the majority of our members operate in and around the urban centre of Letterkenny, a town with 22,000 of a population. As Letterkenny is the hub for services and employment this population nearly doubles each day as people utilise Letterkenny for work, education, health care and leisure. This is a growing urban centre serving the whole county.

Compact growth

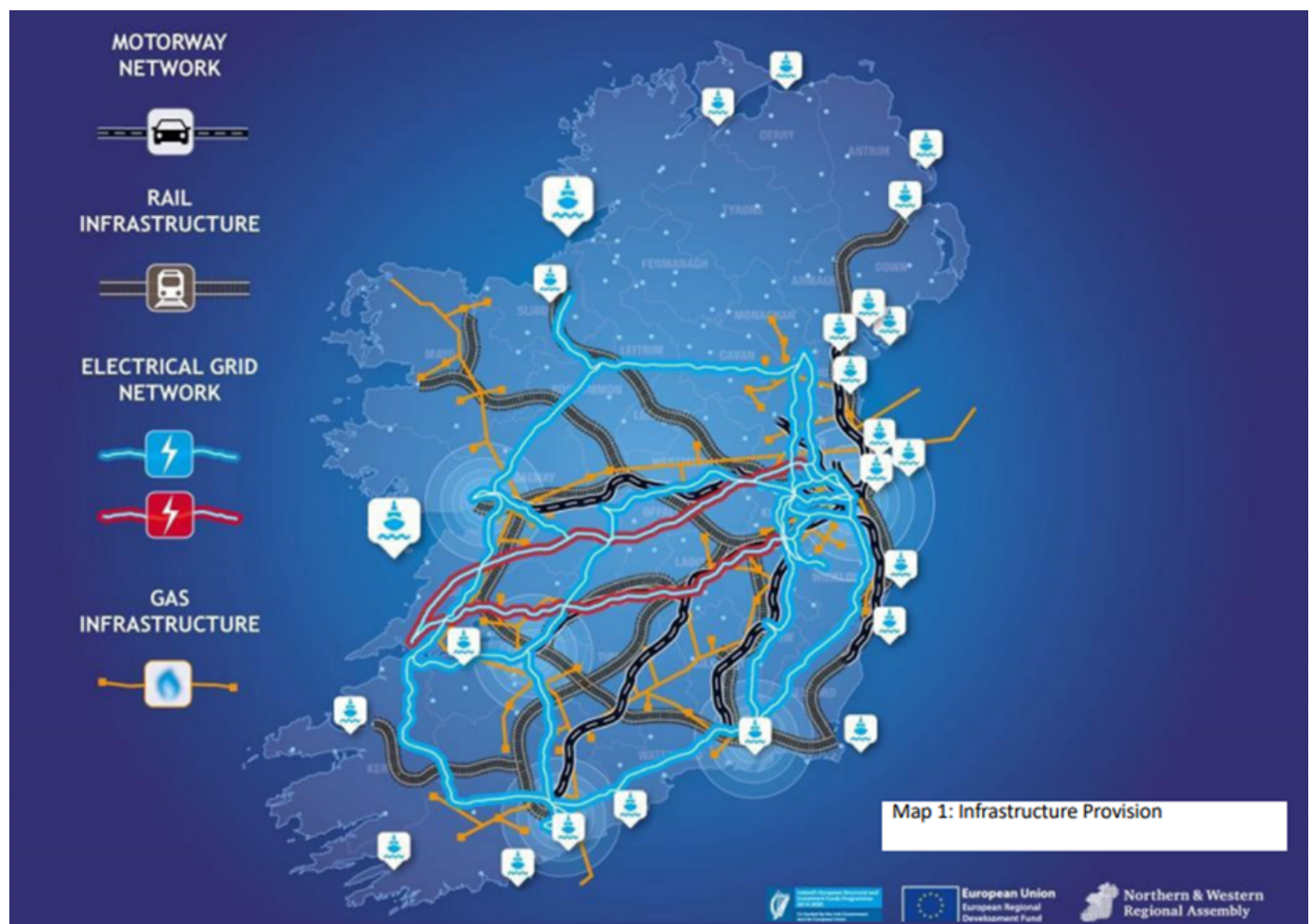
The draft says that we need to manage growth and look at compact growth of towns and villages. There is no doubt that the urban centre of Letterkenny could embrace compact growth within the town centre that would breathe life back into the traditional town centre, however while Donegal Co Co has received URDF funding to transform the town centre which

will attract investment, there is no progress being made. There needs to be a much more co-ordinated cross Government approach and a sense of urgency to get projects off the ground and completed in a timely manner.

Enhanced Regional Accessibility

The document says that a priority is to enhance accessibility between urban centres as well as accessibility to Dublin.

Letterkenny Chamber among others has been calling on improved infrastructure to address just this issue. This needs multi annual funding to deliver. This is the only county in Ireland with no motorway and no rail access.

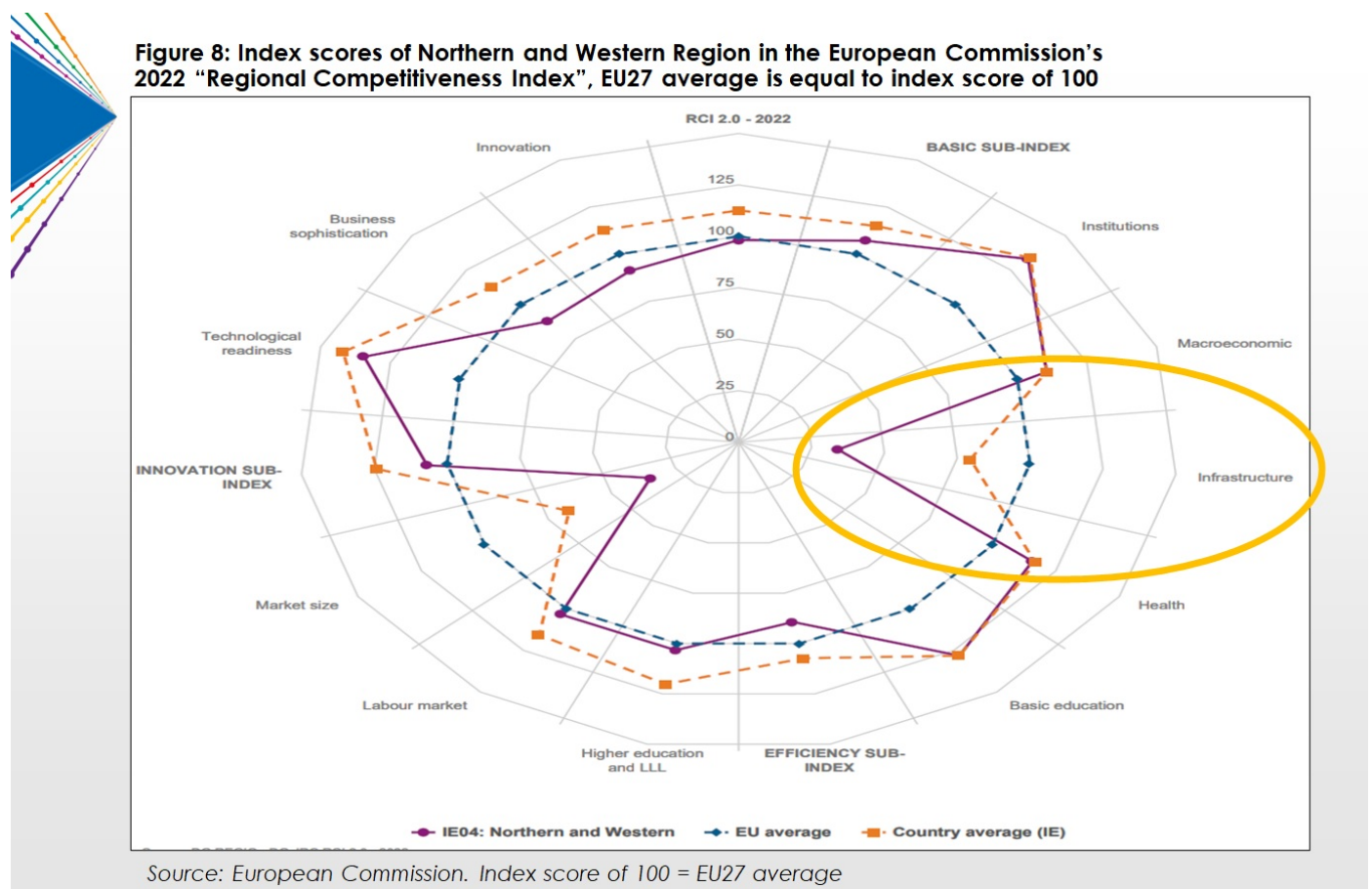


In the recent Strategic Rail Review Donegal was once again overlooked with only one line mentioned between Derry & Letterkenny. This once again leaves Donegal discriminated against in terms of regional investment. Without strategic road and rail investment this part of the Northern Western region will lag for generations to come.

There is no connectivity to Dublin apart for the car for business use. Our counterparts in Cork, Galway, Waterford and Limerick can access Dublin by Rail, making for a more predictable journey time, a much safer journey, an opportunity to work while travelling. Meanwhile Businesses in North Donegal have to use the car on inadequate roads that are unsafe and journey times that are unpredictable.

The mention of the AEC as well as access to the Northwest is just an afterthought in this document.

This is a region in transition (see Figure 8) index scores) and the biggest contributing factor is Infrastructure. Regional accessibility will never be a reality until this infrastructure deficit is addressed once and for all.



Strengthened rural economies and communities

Donegal is a rural and geographically widespread county. Many people travel to urban centres for work but also want to live in a more rural setting. Broadband connectivity has certainly helped these communities to be revitalised and allows people to live and work in a more rural setting however the road connectivity still needs major investment and alternative forms of transport need to be planned for and developed.

Sustainable Mobility

The Northwest region will not become part of this shared vision until we have the infrastructure that enables us to make journeys in a joined up way. We have seen the development of cycle paths in the urban and rural setting, but these are not joined up, in Letterkenny there is no public transport for short journeys and people still drive to access services on even small journeys.

A strong economy, supported by enterprise, innovation and skills

Once again this can be achieved by building regional economic drivers. The NW Reg Tech Cluster, is a cross border super cluster that has the ability to be unique and to support the future investment in this industry. We ask that this super-cluster is allowed to achieve its potential by government intervention. Industry and key stakeholders have brought it to a stage where it now needs significant investment. This would give the North West City Region a cluster of significance and a compelling proposition for future investors.

Enhanced Amenities and Heritage

The Letterkenny 2040 Master Plan and other Master plans across Donegal were welcomed and agreed after much consultation by our members and the wider community. The NPF sees the potential in investing in well-designed public realm, etc. We see the masterplan as having huge potential, but the pace of delivery is too slow.

Transition to low carbon and climate resilient society

The North West could become a self-sufficient in renewable energy or even a net exporter. However, investment needs to be made to the transmission grid for this to become a reality. Donegal has the best most consistent wind supply. But harnessing it needs strategic grid development and infrastructure.

Sustainable Management of Water, Waste and other Environmental resources

Water and wastewater capacity remains an area where once again investment is needed at a strategic level. To manage growth ambitions Donegal will need a much more enhanced water system. The NPF vision will need to be backed up by resources and a cross departmental and agency approach to delivery.

Access to Quality Childcare, Education and Health services

We have a range of Education that provide quality and opportunity. The recent development of ATU making Letterkenny a university Town and Donegal a University County has been welcomed. Our tertiary education cluster enhances the opportunity across the North West City Region by offering third level and training opportunities across the region provided by the strategic partnership and MOU of ETB, NWRC, ATU and Ulster University.

It is important however that government enables the new Technological universities to borrow to fund their development and also to enable them to further develop their Research capability. There are currently no professor roles north of Galway. This is a must for us to live into the opportunities that having a university should bring to our economies.

What happens if we do nothing

We note a number of negative outcomes if we don't have a sustainable planning strategy. We are seeing these already and this draft plan will not change the outcomes for the North West Region unless major legacy deficits are addressed and recommendations made in this plan are delivered at pace.

The issues include increased shift in population and jobs to the East, social disadvantage perpetuated by location and stagnation of urban area. These are currently happening in the North West of Ireland. People and employers are facing social and economic disadvantage because of their location. The NFP can place regional development at the forefront of this plan and address this very issue.

The NPF states that Population set to grow to 6.1m. While we welcome ambitious growth this level of growth needs to be managed, or we will end up with overheated and overcrowded cities that then absorb all the resources and investment to cope with overcrowding. The NPF must take into account the potential of places like Letterkenny, Donegal and the NW City Region that has the latent capacity necessary to grow.

See attached Northern and Western Regional Assembly Regional Investment Tracker published in July 2024 highlighting in detail the legacy of underinvestment in the region and its resultant infrastructure deficit.

Attachments:

 DHLGH-C1-137-324 - regional-investment-tracker-10-07-2024.pdf

2. A New Way Forward

Chapter: 2. A New Way Forward

2.1 Realising Ambition and Potential

The purpose of the National Planning Framework is to enable all parts of Ireland, whether rural or urban, to successfully accommodate growth and change.

The NPF is designed to disrupt trends that have been apparent for the last fifty years. By concentrating development on Dublin and the other cities referenced consistently in this draft we can see no disruption and no real change in how the North Western will be treated in terms of development. As referenced “it is critical that those regions also are served by accessible centres of employment and services that can be a focal point for investment and have the widest possible regional influence”. Sligo is cited as fulfilling this role in the North Western Region yet Letterkenny has a larger population than Sligo and it serves as the regional growth centre for Donegal and the North West City Region.

Even more importantly Letterkenny’s proximity to the border means that the NW City Region is the 4th largest urban agglomeration in the island and the only City Region north of the Galway Dublin line. This cross-border city region is **essential** in supporting the development of the wider NW region. While this draft document uses the phrase “significant cross border interactions” it is much stronger than that. Letterkenny and indeed Donegal – Derry have worked together at a strategic level for some time. There are significant initiatives in health, education and economic development that are working or being developed on a cross border basis. This cross-border city region **needs to be recognised as a driver for economic development** in this National Planning Framework if it is serious about delivering balanced regional development.

2.2 Ireland’s Three Regions

The draft review document indicates the importance of the regions however it needs much more emphasis. Targeting growth in the country’s Northern & Western and Southern regions combined is not ambitious, nor disruptive and other elements of the plan will mean the North & West will remain lagging. Improving access to Dublin and other cities is weak. Once again, we point out that there is no motorway and no rail in Donegal.

We are concerned that this document now refers to Sligo in the North West fulfilling the regional centre role. The Northern Western region is a wide geographical area and while Sligo may serve parts of South Donegal it is by no means viewed as the regional centre. Sligo has rail, better road connections to Dublin and despite this Letterkenny has outpaced it in terms of growth of population. **Letterkenny** needs to be clearly recognised in the NPF as a **regional growth centre**.

It is completely discouraging to see Letterkenny being sidelined in this document. It is hoped through the through the Regional Spatial and Economic Strategy process that Letterkenny is recognised as a regional centre of population and employment growth.

3. Effective Regional Development

Chapter: 3. Effective Regional Development

To effectively deliver Regional Development there needs to be a joined up shared approach aligned with responsibility and accountability. To deliver **transformative growth** the Regional Assemblies will need more resources, but also importantly the stakeholders involved in delivering the social, community and 'hard' infrastructure elements must work together like never before. This will require county and city councils, Government Departments and agencies such as Uisce Éireann, TII, NTA, OPW, port authorities. Decision making and ownership of projects is crucial to deliver transformative change. Regional development in the Norther and Western region needs to adopt a new approach.

Letterkenny Chamber notes that "The Northern and Western region justifies a particular focus in this Framework" and we urge you to ensure this focus is retained and strengthened.

The Northern and Western Region as you rightly mention is now a 'transition' region as designated by the European Commission for the European Regional Development Fund period 2021 to 2027. This once again highlights the particular challenges faced by this region and in particular Donegal.

To this end Investment bias in key enabling infrastructure is required to address longstanding under investment resulting from the City Region's proximity to the border. This requires Government willingness and investment over the next 10 years starting now. It is also vital that key infrastructure projects such as the Donegal Ten-T Network, ATU Letterkenny Library

and IT Education Building alongside the expansion of the Derry Campus of UU and the A5 are delivered with speed and with agencies working together to remove barriers to development. These pieces of essential infrastructure are vital in bringing region out of transition.

The significant town of Letterkenny must be supported and enhanced over the lifetime of this Framework through relevant policies and investment. This includes enhancing governance mechanisms around the delivery of the Strategic plans for Letterkenny. The development of Letterkenny as an urban centre of scale in the region is key to addressing the region's economic challenges.

While a coordinated strategy exists through the collaborative approach of the North-West Strategic Growth Partnership we need the **NW city region to be recognised in terms of its economic development potential in same way as other Cross-border regions are presented in the NPF.**

As a regional centre Letterkenny serves a large hinterland. It's significance as a centre of employment and services is much greater than its scale in terms of population. The presence of strong employment in particular Reg Tech, Fintech and Software development, The regional Hospital , ATU Donegal indicate latent capacity for Letterkenny to enhance its regional role. Letterkenny has set out ambitious population growth targets, it now needs a co-ordinated strategy to ensure the town can grow substantially and attract investment as a key regional growth centre.

4. Making Stronger Urban Places

Chapter: 4. Making Stronger Urban Places

We welcome the acknowledgement that different and complementary strategies will have to be adopted to plan for urban growth. In previous decades there was a more fragmented unplanned approach. Having agreed and consulted on Letterkenny Masterplan, it will take a cocktail of funding and a joined up vision to deliver an enhanced urban environment that addresses dereliction, and creates an attractive and useable urban centre that encourages population growth and investment.

National Policy Objectives 5 and 15 recognise the key regional roles of Athlone in the Midlands, Sligo in the North-West, and the Letterkenny-Derry and Drogheda-Dundalk-Newry cross-border networks and will inform the relevant Regional Spatial and Economic Strategies.

It is important that Letterkenny is recognised as a regional growth centre on a par with other towns like Sligo and Athlone. Letterkenny services the whole of the County in terms of public services, employment and education and has a role in terms of the Letterkenny Derry cross border region. As such it should be also recognised as an entity that has serious ambitions for population growth.

In spite of the lack of critical infrastructure , there are major employers in the town of Letterkenny and the wider region. These employers in the Fin Tech/Reg Tech sectors located in Letterkenny because of its location and access to education and skills. The fact that Letterkenny is now a university town is a huge draw for new businesses and inward investment. Regional policy needs to take this into account when looking at key growth centres.

Through Donegal County Council Letterkenny has been successful in developing projects under the Urban Regeneration and Development Fund (URDF). These projects include a Master Plan and within that various projects should be close to completion. However there is no progress being made. It is our view that when projects are approved and funding awarded timelines need to be set and adhered to from the outset to make these projects a reality. Urban centres need attention now so new ways of delivering these type of projects should be adopted quickly.

TOWN CENTRE FIRST – the town centre first initiative has been in existence for some years now. Letterkenny Chamber believes that this initiative needs to be resourced at a much higher level if we are to see transformative change in towns and villages. Alternatively the Living Cities initiative should be extended to include large towns and centres of growth such as Letterkenny. In the Letterkenny masterplan compact growth in the town centre is an aspiration however URDF funding cannot deliver all that is needed. There are projects with housing as an integral part.

We need a whole of government approach to revitalising the urban centres.

5. Planning for Diverse Rural Places

Chapter: 5. Planning for Diverse Rural Places

As a general observation County Donegal has a high level of rurality and as described in the case study (Gteic Hub) there are opportunities through broadband connectivity for people and businesses so that rurality is less of an issue.

Letterkenny serves the rural communities and Letterkenny Chamber is of the opinion that we need the rural towns and villages to thrive alongside the Urban centre of Letterkenny. People who live in more rural areas understand that all services cannot be on their door step but a thriving town or village is important to keep these communities alive and provide community cohesion. In tandem with this the urban centres that act as service centres need to have all the amenities necessary to make rural living a sustainable choice.

6. People, Homes and Communities

Chapter: 6. People, Homes and Communities

6.1 Quality of Life and Place

People in Donegal and the North West enjoy an good quality of life. In recent years broadband connectivity has allowed many more people to live close to family and yet be connected to work. The rural nature of Donegal and it's open spaces can deliver a better quality of life than other places. The connected hubs play an important role here and having a town or village community is hugely important for families.

We however need affordable homes in which people can live and thrive.

6.2 Healthy Communities

This is an aspiration for all and much work is being done on providing improved pavements and cycleways. There also needs to be a more joined up approach to public/private transport services. If we want people to move from car to other forms of transport we need to make it simple and affordable. Services from the more rural areas need to be timetabled for purposes of work and education.

In the urban context physical design can bring huge benefits, however the projects need to coalesce to ensure the urban centre works together. E.g. Much work has been done around cycle lanes and improved footpaths and public realm around school, campuses, . This has created a more pleasing landscape and in the long term should reduce car usage in the area. However to actually get students to walk or cycle there needs to be joined up infrastructure, places for parents to drop off , etc.

With many projects they need to get funding that allows a whole town project to be worked on at the same time in order to deliver real change.

Under National Policy objective 38 create a joined up view, cycle lanes will only work effectively if a person can be on a cycle lane for the whole journey. In an urban context these need to be developed as a whole rather than piecemeal. only with an integrated network will their use increase substantially.

Referencing Figure 6.2 Hierarchy of Infrastructure, Letterkenny as a large town is still lacking in a number of areas namely – major bus/rail park n ride and cycle network and Waste and sewage treatment.

Letterkenny has no integrated transport hub, no park n ride facilities and the cycle network is not fit for purpose. These need to be included in plans going forward if we are ever to get people to change transport habits.

National Policy Objective 40

Support the implementation of language plans in Gaeltacht Language Planning Areas, Gaeltacht Service Towns and Irish Language Networks.

Letterkenny is a Gaeltacht Service town and it is working well but needs more resources for all it's plans to be fully implemented. .

6.5 Childcare, Education and Life Long Learning

Affordable Childcare is essential to the economic development of a region. Currently cost and availability is having a negative effect on people being able to work and bring up families at the same time. We need to make childcare accessible for all levels of income so that parents can take up jobs and business opportunities without impacting families incomes.

There is already a high level of collaboration between industry and further education provision. The ATU in it's previous time as LYIT has fostered relationships and it has developed courses that respond to skills needs. This collaboration is vital to the development of the region in terms of skills and research.

On a related note Technological universities need to be able to move into the research space, they also need to be able to raise revenues and take out loans for the development of the university. It needs courses and personnel at a high level to enable them to contribute even more to the local economy.

6.6 Housing

Policy Objective 43 To target the delivery of housing to accommodate approximately 50,000 additional households per annum to 2040.

Lack of housing is at a critical point. From a business point of view members from all sectors are struggling to recruit due to lack of housing availability. There are simply no homes available to rent or buy. There is a severe lack of social housing due to years when none were built so people who would normally be in social housing are now occupying the private rental sector, leaving few available at the right price for people who live here and those who are seeking job opportunities.

In addition because of recent unplanned location of international protection applicants there are properties that may have been available in the private market that are not available. It is the unplanned nature of this that is causing an issue.

In addition the price of property is not sufficient to make it worthwhile for developers, so there is also insufficient private development.

The crisis is also amplified because of the Defective Blocks Crisis prevalent in The County. Many houses are being demolished and families are struggling to find places to live. Social housing needs to be ramped up substantially and we need to incentivise developers to bring forward private developments at pace.

Planning services need to recognise the urgency of the situation and councils need to have more resources to ensure the barriers to development are removed. An all agency approach is needed with real collaboration and joined up permissions from planning, Council Uisce Eireann, ESB and roads. Once planning permission is granted the access to services for the development should be easily achieved.

Housing development needs to be transformed. Developers are willing to play their part and pay their way but are asking for a much more integrated service that gets them from planning approval to building much more quickly.

7. Realising our Island and Marine Potential

Chapter: 7. Realising our Island and Marine Potential

Donegal has strong links to the sea. Our marine environment is a national asset that yields a wide range of commercial and societal benefits through activities such as commercial fishing, transport, tourism, recreation, renewable energy and cultural heritage, as well as playing a vital role in supporting marine life and biodiversity more generally.

We are calling for the potential of Marine sector in supporting economic development of the region be reinstated in Chapter 7.

Offshore Renewable Energy

The coast of Donegal is capable of delivering renewable energy that would make the county sustainable in terms of renewable energy so helping deliver on climate action plans.

The enabling infrastructure needs to be put in place to allow this to happen. Our marine sector is innovative and are ready to bring in and develop the skills required to make off shore renewable energy a reality. However government will need to address the Grid's ability to transmit the power generated. This is a huge opportunity for Killybegs Port and the potential spin offs and opportunities for the whole region are huge.

8. Working with Our Neighbours

Chapter: 8. Working with Our Neighbours

In 2021, the revised National Development Plan set an enhanced level of ambition for collaborative cross-border investment, to build a more connected, prosperous and sustainable island.

The Government is working through all-island partnerships to co-design, co-fund and co-deliver investments to enhance the shared island and address common strategic concerns.

The North West City Region through the strategic Alliance works together like no other cross border area. All the policy objectives in this chapter are important and must be retained. The North west city region is unique, we share a land border but it is a fluid border and 20% of the Derry population actually live in Donegal. Citizens cross the border daily for school, work and shared services. If the NPF is serious about making a more sustainable, connected and

prosperous island the recognition of the potential of the NW City Region is crucial. If recognised as a City region on a par with the other cities and given the investment needed this would deliver balanced regional development in a way that has never been realised before.

This cross border region is different to the eastern seaboard as cited previously because of the infrastructure deficit. Belfast, Newry, Dundalk, Dublin corridor has motorway and rail provision and the economic benefits that being connected to the major cities of Dublin and Belfast brings. There is one City in the North West Region and we need to recognise its importance on the island of Ireland and the significance of it for this region. .

The **City Status of NW City Region** which is the **4th largest urban agglomeration** on Island and only City Region North of Galway Dublin line **needs to be recognised more clearly** in this document. A strong City Region is essential to support the successful development of the wider NW region.

Investment bias in key enabling infrastructure to address longstanding under investment resulting from the City Region's proximity to the border is needed as a priority. Enabling investment of this kind would at the very least create a more level playing field in terms of this region and county.

In short it is crucial that the potential of NW city region is recognised in terms of its economic development potential in same way as other Cross-border regions are presented in the NPF.

10. Implementing the National Planning Framework

Chapter: 10. Implementing the National Planning Framework

Governance and Oversight

We need a joined up approach with regional targets and accountability. We need to clearly state who is responsible for aspects of implementation. There needs to be a clear approach, bringing together government departments and agencies. We do this well on a local basis and can deliver, however it needs to be done on a national basis if we are to implement this National Plan.

The NPF will only deliver for the regions if there is a clear intention and clear lines of responsibility in all government departments . Clear commitments, funding and outputs are the only way we can deliver and work in a progressive , sustainable and prosperous region.

The NPF implementation needs to prioritise regions as it says in the Vision and not just concentrate on the Main Cities.

Doing what we have always done will give the same results and result in a country with population and development concentrating on the eastern seaboard, crowded cities that use up and drain valuable resources.

This is an opportunity to really deliver for the regions and create an island that has opportunities for all.

Letterkenny Chamber asks that the Revised NPF does the following:

- Recognise the City Status of NW City Region which is the 4th largest urban agglomeration on Island and only City Region North of Galway Dublin line. A strong City Region is essential to support the successful development of the wider NW region.
- Letterkenny as a Centre for Growth and Urban Centre of Scale in the North West needs to be fully supported.
- Investment bias in key enabling infrastructure is required to address many years of under investment resulting from the City Region's proximity to the border.
- The potential of Marine sector in supporting economic development of the Region should be reinstated in Chapter 7.
- The potential of NW city region be recognised in terms of its economic development potential in same way as other Cross-border regions are presented in the NPF.

In addition:

- Provide a stimulus package for the Northern and Western Region (€570m) representing 2% of the regions GDP.
- Adopt a policy of Positive Discrimination for the National Development Plan.
- Explore how greater regional autonomy can be delivered in Ireland. Regional autonomy is central to addressing regional disparities, supporting efficiencies in public services and improving political stability.

Boundaries Captured on Map: No