

## Engineers Ireland

# Submission on ‘Ireland 2040 Our Plan – Draft National Planning Framework’

For the attention of the Future Planning Section, Department of Housing, Planning and Local Government

1<sup>st</sup> November 2017

### Highlights

- Ireland 2040 Our Plan is a welcome framework for future development and investment
- NPF needs additional focus on an All-Island approach (incl. Brexit mitigation measures, promotion of climate action and greater detail on the development framework of cities)
- Implementation should include institutional reform on infrastructure needs and delivery
- Infrastructure priorities should be clarified, expanded and embedded throughout the NPF

## 1. Introduction: ‘Ireland 2040 Our Plan’ as a vital framework

Engineers Ireland warmly welcomes the publication of ‘Ireland 2040 Our Plan – Draft National Planning Framework’ (‘NPF’ hereafter). Firstly, we strongly support the four High-Level Objectives (p26) of the NPF, which could be summarised as:

1. Improving prosperity, sustainability and well-being
2. Enhancing Irish economy, society and environment
3. Spatially planning for effective and co-ordinated investment
4. Strategising for sustainable development

Engineers are prepared to step up to the challenges of achieving these objectives, drawing on the diversity, innovation and integrity of our profession.

We concur that a long-term mindset in the order of 20 years is required to achieve these Objectives and we further support the 8 components of the 2040 vision (p27): fairness, sustainable options, quality of life, innovation, connectivity, collaboration, circular economy and competitiveness.

The remainder of this submission considers: (i) High Level Observations, (ii) Implementation and Governance, and (iii) National Investment Plan and Key Projects.

## 2. High Level Observations

### 2.1 Atlantic Economic Corridor and Dublin

Regarding planning for future growth, we agree that:

- Population and jobs growth should be spatially aligned (National Policy Objective 2a)
- The majority of population and jobs growth and new homes should be focused in the five cities (National Policy Objective 2b & 3b)
- Accessibility to the north-west and between centres of scale separate from Dublin should be improved (National Policy Objective 2c)

The achievement of these objectives would help to relieve the pressure currently facing Dublin in terms of housing, transport, water etc.

However, we believe that the NPF could be strengthened by explicitly referencing the potential for the Atlantic Economic Corridor (Waterford, Cork, Limerick/Shannon and Galway) to act as a counterbalance to Dublin. The 'Atlantic City Regions: Development and Connectivity' report<sup>1</sup> analyses in considerable detail, both the potential for, and current obstacles to, enhanced growth through improved connectivity across a range of areas including energy, land transport, ports, water/wastewater and complementary employment growth through industry concentration. The inclusion of the Atlantic Economic Corridor in a National Policy Objective would complement the objectives outlined in Chapter 3 and Chapter 9.

At the same time, we believe it to be important to acknowledge Dublin's role as a national economic driver, contributing 48% GDP. The 'Our Capital' box on p31 is useful and could be expressed as a new set of National Policy Objectives, perhaps as a subset of National Policy Objective 5 and related to p52-53. These objectives could set out greater detail on the development framework of Dublin.

### 2.2 All-island approach and Brexit

Engineers Ireland is strongly supportive of an all-island approach to connectivity and growth and would like to see significantly improved connectivity on corridors such as Galway-Sligo-Letterkenny-Derry, Dublin-Dundalk-Belfast and Dublin-Derry/Letterkenny. Such connectivity would enhance the attractiveness of all of these centres, providing focal points for growth throughout and between the regions.

We are supportive of the NPF's areas for practical co-operation between relevant Departments and local authorities in Ireland and Northern Ireland, including the Dublin-Belfast Economic Corridor, the North-West Strategic Growth Partnership and coordination of investment in infrastructure, and managing our shared environment responsibly (National Policy Objectives 45-53).

In this context, Brexit has the potential to pose major challenges. The NPF states:

*"While the precise nature of these impacts will not be known until after Ireland 2040 is finalised, future iterations of the National Planning Framework will have the opportunity to take on board their practical ramifications." (p99)*

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<sup>1</sup> Irish Academy of Engineering (2015). Atlantic City Regions: Development and Connectivity.

Brexit is subsequently referenced in:

- High-quality international connectivity through ports and airports (p124)
- Strengthening the resilience of the economy (p131)
- Cross-border development and the accessibility of the North-West (p133/4)

The NPF also contains a proposal to include planning and infrastructure coordination activities in two of the Good Friday Agreement institutions, the North-South Ministerial Council and the British-Irish Council:

*“Despite the challenges posed by Brexit, recognising the strong economic, cultural and practical ties between Ireland and its neighbours, both in a north-south and east-west context, subject to the agreement of Governments and institutions, cooperation and interaction through political and administrative structures such as the North-South Ministerial Council and the British-Irish Council will be broadened to include a specific national planning and infrastructure coordination stream of activity.” (p129)*

We believe that the NPF must explicitly acknowledge the challenges that Brexit will pose to north-south co-operation and east-west co-operation. While the precise impacts of Brexit remain unclear, it would be in keeping with the philosophy of the NPF to plan for the mitigation of damaging future scenarios.

Therefore, explicit emphasis should be placed on planning and infrastructural measures which could help to mitigate the effects of Brexit on Irish society, economy and environment. These include: A5 Aughnacloy to Derry; high speed, high frequency rail between Dublin and Belfast; and the North-South Interconnector.

### **2.3 Climate action**

The latest greenhouse gas emissions accounts show a 3.7% increase from 2014 to 2015<sup>2</sup>, making for alarming reading. EPA projections suggest that Ireland’s emissions in 2020 may only be 4-6% below 2005 levels, far behind the 20% reduction target. By 2030, the EPA estimates that non-ETS emissions will be 1-3% below 2005 levels<sup>3</sup>, even further behind EU targets (30% reduction). Missing these targets will mean that Ireland could incur fines of up to €610 million each year.

Moreover, missing these targets severely compromises Ireland’s contribution to the UN Sustainable Development Goals and the Paris Agreement. We are supportive of the NPF statements on climate throughout Chapter 8, but feel that the level of urgency in this area could be better expressed. More information could be provided on, for example, “integrating climate action into the planning system” (National Policy Objective 56). The NPF could be much better linked to the National Mitigation Plan, which commits to 106 actions to enable the transition to a low-carbon society by 2050.

### **2.4 Trends in technology**

Trends in energy (renewables), coupled with transforming technology (the Internet of Things, big data, sensor technology) and transport solutions (autonomous and connected vehicles, electricity storage, hydrogen fuel cells, road networks as energy distributors) have brought us to the cusp of a revolution in how we live and work. We believe that the potential for increased prosperity,

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<sup>2</sup> Environmental Protection Agency (2017). Ireland’s Greenhouse Gas Emissions in 2015.

<sup>3</sup> Environmental Protection Agency (2017). Ireland’s Greenhouse Gas Emission Projections 2016-2035.

sustainability and well-being offered by these and other trends could be more thoroughly commented upon and referenced throughout the NPF.

### **3. Implementation and Governance**

#### **3.1 Indicative national infrastructure priorities**

Engineers Ireland believes that the implementation of the NPF through long-term investment planning is extremely important. We strongly welcome the statement:

*“A ten-year National Investment Plan for 2018-2027 will support the implementation of Ireland 2040 and the National Strategic Outcomes highlighted.” (p130)*

We note that each one of the National Strategic Outcomes (p123-5) will require the engineering community to play a significant role. These are:

- Compact, Smart Growth
- Enhanced Regional Accessibility
- High Quality International Connectivity
- Sustainable Mobility
- A Strong Digital Economy
- Empowered Rural Communities
- Enhanced Urban Amenity
- Transition to a Low Carbon and Climate Resilient Society
- Sustainable Management of Water and other Environmental Resources
- Access to Quality Childcare, Education and Health Services

The Planning and Development (Amendment) Bill 2016 as initiated (p44) states that the NPF shall address “the indication of national infrastructure priorities to address the strategic development requirements”. The NPF itself states:

*“National Strategic Outcomes for consideration in developing the National Investment Plan that will support the Ireland 2040 are outlined below. This is an indicative outline at this point. Project selection will require an evidence base identifying the investments that are most likely to yield proportionate benefits and progress towards Ireland 2040 goals.” (p132)*

While we support each of the National Strategic Outcomes, we believe that the status of the bullet pointed recommendations under each National Strategic Outcome (p132-141) should be clarified; these are referred to as objectives, criteria, projects and programmes in various cases. To ensure alignment with the Bill and to best frame the forthcoming National Investment Plan, we would like these recommendations to be termed ‘indicative national infrastructure priorities’.

#### **3.2 Institutional reform**

Engineers Ireland has long campaigned for institutional reform in national infrastructure planning. We believe that a new body should be established to bring together the multiple institutions and policy instruments currently involved in infrastructure planning to ensure an integrated, efficient and sustainable approach. Such a body would work collaboratively with external experts on the economy, environment and society to develop a long-term vision and strategy, identify priority projects, and explore innovative financing and funding mechanisms.

For example, the UK National Infrastructure Commission carries out a National Infrastructure Assessment<sup>4</sup> (once per parliament) to:

- analyse the UK's long-term economic infrastructure needs
- outline a strategic vision over a 30-year time horizon
- set out recommendations for how identified needs should begin to be met

We believe that the DHPLG should review the performance of the UK National Infrastructure Commission as well as models in Australia, Canada, Switzerland etc. and the applicability of these models to Ireland. We believe that the NPF should include as an objective the establishment of such a body to strengthen the implementation of the National Planning Framework and the National Investment Plan, particularly in identifying national infrastructure priorities.

Engineers Ireland agrees that there is a need for “substantially better linkage between zoning of land and the availability of infrastructure” and that priority should be given to those lands which have the basic infrastructural services for development to be realised (p128, Appendix 1). Moreover, we agree that development lands should be prioritised according to “overall planned levels of growth, location, suitability for the type of development envisaged, availability of and proximity to amenities, schools, shops or employment, accessibility to transport services etc.” (p129, Appendix 2).

Beyond these issues, Ireland faces significant challenges in the timely and efficient delivery of infrastructure projects. Engineers Ireland would like to see a more coordinated and holistic approach to infrastructure delivery, focusing on project management. We are interested in the NPF's proposal, in the context of urban development, for the establishment of special purpose vehicles such as a national land development agency (National Policy Objective 12). The NPF notes:

*“To be effectively applied across the country, this is likely to require some institutional and legislative change. In particular, a national ‘development agency’ approach would establish a core pool of expertise to drive development in conjunction with local authorities and other stakeholders.” (p51)*

We believe the NPF could go further by bringing together existing agencies involved in developing land, financing and delivering infrastructure into one agency. Such an agency would take the lead in State-led strategic land development as outlined in National Policy Objective 69 and the remainder of p129.

#### **4. National Investment Plan and Key Projects**

The membership of Engineers Ireland has a wealth of experience in designing, planning and delivering capital projects spanning many decades. Over the past decade, we have observed and campaigned on the acute underinvestment in infrastructure which has been causing damage to Irish society, economy and environment. We therefore welcome recent increases in capital investment and, in particular, the move towards long-term investment planning envisaged in the National Investment Plan and tied to the NPF.

Before commenting our key infrastructure recommendations, we take issue with one statement which prefaces the NPF's priorities for the National Investment Plan:

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<sup>4</sup> National Infrastructure Commission (2016). The National Infrastructure Assessment: Process & Methodology

*“The Fiscal Council have observed that current spending plans to 2021 ‘return public investment to levels that are comparatively high in the international context’.” (p131)*

The Irish Fiscal Advisory Council has been considering public investment levels as a share of government revenue (or spending)<sup>5</sup>:

*“As a share of either government spending or revenues, this would imply public investment in Ireland moving from relatively low levels to among the highest in the EU.”*

We do not believe this to be an appropriate indicator of our international ranking when it comes to public investment in infrastructure. The EU, for example, takes public investment in infrastructure as a percentage of GDP<sup>6</sup>.

According to this measure, in 2016, Ireland ranked the second lowest in the EU. Even taking into account the committed increases in investment over the next number of years and the distortion of Ireland’s GDP, Ireland’s public investment in infrastructure would not be high compared to countries which face similar economic and demographic pressures. Therefore, we believe that this paragraph should be removed from p131. In its place, the NPF should set a national investment target or a minimum level of investment to be achieved over the course of the National Investment Plan. This should be expressed as a percentage of GDP to allow historical comparison within Ireland, and comparison with investment in infrastructure in relevant developed economies.

Each year, Engineers Ireland prepares ‘The State of Ireland,’ an independent assessment of infrastructure, recommending two-year and five-year actions in transport, communications, energy, water, wastewater, flooding and waste<sup>7</sup>.

We are very glad to note that many of the projects we have recommended are included in the priorities for the National Investment Plan. These include:

- M8/N25/N40 Dunkettle Junction upgrade
- Upgraded access to the North-West border area, including the A5
- Metro North, DART Expansion Programme and BusConnects
- Improved connectivity to ports
- Implementation of the National Broadband Plan
- 5G information and communications technology
- North-south electricity grid interconnection
- Implementation of the CFRAM programme

We would also like to see priority given to the following projects:

- The M20 between Cork and Limerick as part of the Atlantic Economic Corridor
- Infrastructure to support electric vehicles and alternative fuels
- Specific planning measures to support renewable energy technologies
- Improved port infrastructure and facilities to support renewable energy and energy security

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<sup>5</sup> Irish Fiscal Advisory Council (2017). Pre-Budget 2018 Submission.

<sup>6</sup> Eurostat (2017). General government fixed investment. Available at: <http://ec.europa.eu/eurostat/web/products-datasets/-/teina210>

<sup>7</sup> Engineers Ireland (2017). The State of Ireland 2017. Available at: <http://engineersireland.ie/Communications.aspx>

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### **Background to Engineers Ireland**

With over 23,000 members from every discipline of engineering, Engineers Ireland is the voice of the engineering profession in Ireland. Engineers Ireland was established in 1835 making us one of the oldest and largest professional bodies in the country. Members come from every discipline of engineering, and range from engineering students to fellows of the profession.

### **Our responsibility is to**

- Promote knowledge of engineering
- Establish and maintain standards of professional engineering and engineering education
- Provide opportunities for Continuing Professional Development (CPD)
- Maintain standards of professional ethics and conduct
- Ensure that professional titles are granted to qualified candidates
- Act as the authoritative voice of the engineering profession in Ireland

### **Our Vision Statement**

Engineers Ireland: a community of creative professionals delivering solutions for society.

### **Our Mission Statement**

Engineers Ireland is an organisation that enables the engineering community to progress their professional development, make an impact on society and encourage and educate the future generations of engineers.