



**Chambers
Ireland**

Advancing business together

**Chambers Ireland Submission on the National
Development Plan Review to Renew Consultation**

February 2021

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Executive Summary

The revised National Development Plan needs to deliver for our cities and towns so that they are transformed into attractive spaces where people want to live and work, a failure to succeed in this will entirely undermine the National Planning Framework.

Helping our economy rebound from Covid-19, responding to Brexit, and implementing the Climate Action Plan must be the key agenda items for the Revise to Renew Process.

Out urban, intra-urban, and inter-urban, transport networks need significant upgrading so that public transport can be effective, and active transport can become the primary mode of travel for our daily needs. Access to high speed broadband must become a given to the largest number of people across all parts of the county as rapidly as possible – with the focus of delivery being centred on our urban areas.

The capacity of the state to deliver on infrastructure, on time and on budget must be addressed. Better use needs to be made of international learnings in procurement; including models of contract other than the standard Public Works Contract, more refined cost-benefit analyses, carbon budgeting, green/social accounting, and capacity to achieve the population densification targets of our National Planning Framework.

Our planning system will need investment and considerable reform if it is to be able to oversee the rollout of the enormous amount of infrastructure that we need, in a timely fashion, and in ways that protect both private interests and the public good.

The projects which are part of the existing National Development Plan need to see significant progression in the near-term, but also much more will be needed if we are to mitigate the impact

of Covid-19, Brexit, while meeting our Climate Action targets, and making most effective use out of the European Green Deal.

With Brexit having disrupted many of our traditional supply chains and trade routes, our continued access to external markets has become an even greater national concern. Supporting trade with our partner EU countries, through broadening the number of connections into our EU, and Global, trading partners must be a key part of the revised National Development Plan. Existing connections need to be deepened, supporting extra capacity that integrates us further with international supply chains, and frequency along existing routes must be increased. This will require increased investment in our passenger and freight connection points directly, and also investment in the multimodal domestic transport networks that knit those international hubs more tightly into our domestic economy.

Finally, our energy networks need to be reinforced so that they can accept that vast amounts of electricity which our sea resources are making available to us. Our offshore energy opportunities must become the key driver in improving the economic health of our regional areas while we take advantage of our chance to become a net exporter of clean energy to transform our national economy.

Chambers Ireland's Perspective on the National Development Plan

Chambers Ireland is the State's largest business representative network. We are an all-island organisation with a unique geographical reach; our members are the chambers of commerce in the cities and towns throughout the country – active in every constituency. Each of our member chambers is central to their local business community and all seek to promote thriving local economies that can support sustainable cities and communities.

Our member Chambers are anxious to see the Review to Renew process accelerate the ambition of the National Development Plan. Between the demands that the Brexit process and the Covid-19 crisis have placed on the political and administrative resources of the state, the economic constraints that the necessary public health response to the pandemic, and Brexit's damage to supply chains we are far from where we need to be if we are to meet the demands that the coming decades will place upon our capital infrastructure, our society, and our environment.

For our network it is critical that infrastructure programmes that are already in the development pipeline, such as the Dart electrification programme are rapidly advanced.

There are three reasons for doing so:

1. The ongoing and unprecedented slump in our domestic economy
2. The decade long overhang of underinvestment in public infrastructure
3. The opportunity to lock-in extremely low interest rates for capital financing

The Collapse in Domestic Demand

The domestic economy is in trouble, housing commencements collapsed in 2020, the Covid-19 lockdown has accelerated the decline in commercial retail, the shift towards remote working is putting the future of flagship corporate HQs in particular at risk.

This has the direct effect of depressing demand across the economy, while also creating an opportunity for more efficient public spending, because public spending during these uncertain times is less likely to crowd out private spending.

Complementing this, increased spending on infrastructure during the duration of the slump will not only add to the national capital stock, the costs associated with it will receive a de facto subsidy as a result of the decrease burden the automatic stabilisers will have on the exchequer. An element of the current crisis which is distinct from other earlier ones is the global, and particularly anglophone, nature of the economic shock. While traditionally, the exchequer burden of economic downturns has been reduced through the mechanism of emigration. This 'pressure valve' is unlikely to have a significant effect over the near term as Britain is likely to continue have one of the weakest economies among our trading partners, while others such as New Zealand, and Australia may be slow to reopen their borders to migrants. With few obvious destinations available for migrants, it seems as though it is much more likely that large numbers of disproportionately young people, whose experience is suited towards among the lower skilled sectors of the economy will remain in Ireland.

The Investment Gap

While it is unfortunate that the domestic economy suffered from a decade of lost investment in the wake of the last economic collapse this means that there are many obvious and advanced projects – including the upgrading of the national grid to support renewables, the massive problems of poor planning and vacancies which blight out cities and towns, the urgent need for strategic transport investment in transport projects such as the Dart Extension, the Waterford/Cork/Limerick/ and Galway Metropolitan Area Transport Strategies, the Metro, Bus Connects, upgrading the North/South rail-line, the introduction of the Dart Interconnector etc. – that need urgent work.

Our energy system, and its associated regulatory regime, is desperately in need of an overhaul. With the shift towards renewables we are in a position to transform our economy into a net energy producer which is likely to have an enlivening effect on our regional areas which have to date been so dependent on the inherently volatile tourist trade. In contrast, there is always an appetite for power, with ambitious investment in our energy networks we will be able to position our country to fully take advantage of the opportunities of the coming decades. Should we maximise our share of the value chain associated with offshore energy (whether wind, wave, or tidal) we will have the opportunity to become a powerhouse for Europe creating an opportunity for the betterment of the quality of life for everyone on this island which has never previously existed.

Supporting this, public works projects will offer us the opportunity to remake our cities and towns, and shift our transport within them, and between them, onto pathways that are sustainable out into the long run. In removing our dependence on energy imports and shifting our energy consumption towards renewables, and storage options including

Hydrogen and ammonia we will create a more productive, more efficient and more sustainable economy that will allow our society to truly flourish.

Unprecedented Access to Capital

A lack of readily available capital, at low cost, has been a problem that has held back our country for the last century. With our long run debt profile stabilised, and negative yields on many of our debt instruments there has never been a better time to invest in ourselves.

Furthermore, should increased investment be directed towards efforts that support the decarbonisation of our economy, the wider green transition such as retrofitting or ameliorating the housing crisis, they will easily within various EU funding programmes, and European Investment Bank green which will further depress the real cost of these projects while mitigating the impact of the global economic down-turn on Ireland and positioning ourselves to become a leader in green energy.

Review to Renew Priorities for Chambers Ireland

Chambers Ireland is calling on the Government to accelerate their ambition for both the country and the National Development Plan. Since the National Development Plan was initiated, far more has happened to the global, and our domestic economy, than could have been reasonably anticipated.

An important lesson for us is that the economic turmoil that has persisted in many guises over the last twenty years is likely to continue for a considerable period to come. This is not necessarily a negative thing for a small and agile country which is plugged into many markets across the globe, but it does highlight problems such as our regional dependence on international tourism, an industry that can reasonably expect a severe shock every few years.

Also, as was highlighted by the Fiscal Advisory Council the time it takes our economy to return to baseline after an economic shock, *ceteris paribus*, is longer than we have been having between economic shocks which highlights the importance of the role which government has to play in stimulating domestic demand if we are to evade the long-term scarring and damage which hysteresis effects have upon our national economic opportunity.

The National Importance of Review to Renew

The Review to Renew process must seek to update the National Development Plan to accommodate the changes in circumstances that have occurred since its initial publication.

Most immediate in their proximity are the twin economic shocks of Covid-19 and Brexit, however more important to the National Development Plan's capacity to meet the needs of the National Planning Framework will be the Climate Action Plan (due to be revised itself this year) in the context of the more stringent EU Climate Action CO₂ reduction targets, and opportunities for Ireland presented by the European Green Deal.

In consultation with our network Chambers Ireland have highlighted three areas where the ambitions of the National Development Plan will need to be expanded:

1. Urban Revival
2. Decarbonising the Economy
3. International Connections

These short-to-medium term goals fold into, and support our longer-term agenda to see Ireland become the home of a stable, sustainable, prosperous people with a society that ensures that all us who live here benefit from a quality of life that becomes the ambition of our peer nations globally.

Chambers Ireland and the Sustainable Development Goals

Our network of chambers uses the Sustainable Development Goals to prioritise our policy analysis and recommendations with five of these being most prominent in our considerations:

1. Decent Work and Economic Growth
2. Sustainable Cities and Communities
3. Gender Equality
4. Industry, Innovation and Infrastructure
5. Climate Action

As a business representative body, Decent Work and Economic Growth (Goal 8) is important to us, not least because our success at accomplishing the aims of the Sustainable Development Goals is underpinned by the general health of our economy. In particular, times of economic downturn in Ireland have often been accompanied by a pro-cyclical decline in public capital infrastructure investment. This tradition of under-investment has not only made downturns more pronounced, this austerity-driven amplification process also put our economy onto long-run output trajectories which have been characterised by lower economic production capacities (against pre-downturn levels) that has arisen out of economic scarring¹, other hysteresis processes such as emigration², and most importantly the undermining of our competitiveness through the large opportunity costs that have been associated with the failure to deliver on necessary investments. It is essential the National Development Plan acts as an engine of economic growth to minimise the long-run consequences of the shocks our domestic economy is currently experiencing.

¹ [Developments in the Irish Labour Market during the Crisis: What Lessons for Policy?](#) *Journal of the Statistical and Social Inquiry Society of Ireland*, Vol. 44, 2014-5, pp. 18-39

² [Return Migration and Optimal Tax Rules: A Hysteresis Case](#), *International Advances in Economic Research* volume 15, Article number: 487 (2009)

Nurturing a vibrant, sustainable and resilient economy must be a core element of the revised National Development Plan. With a robust economic core we can more easily make advances in areas such as Gender Equality (Goal 5) that has been severely undermined by the Covid-19 crisis, notably in relation to access to childcare.

Other Sustainable Development Goals are not only positive, in and of themselves, they are also means by which our economic goals can be achieved, and are fundamental to the National Development Plan itself. Developing Sustainable Cities and Communities (Goal 11) will not only support our economic achievement, it also directs us towards investing in our urban cores to support town centre living.

Urban Revival

More, and better, urban living not only supports the National Planning Framework, building Sustainable Cities and Communities also facilitates the development of lifestyles which are more dependent on active travel and so are less carbon intensive. Upgrading and reusing the vacant premises (which are a deadweight on our cities, towns, and Local Authorities) will help us address social policy problems like the housing crisis, and will do so in ways that will consume less of our carbon budget between now and net neutrality in 2050. Upgrading the physical stock of our cities and towns offers us an opportunity to efficiently retrofit those buildings which will not only reduce cost of living for urban populations, but also have a disproportionate effect on reducing fuel poverty (which is largely an urban problem³).

The interactions between better urban living options, active travel, public realm improvements support thriving cities and towns that can become again the engines of

³ Barrington Lecture titled *Has Fuel Poverty Changed and How Should Policy Respond? Charting fuel poverty in Ireland, 1987-2015*, by Dr. Niall Farrell of Queen's University Belfast.

our domestic economy. The unfortunate decision making that has led us to emulate the disastrous practices of late-20th Century US planning systems have hollowed out our once vibrant cities and towns. While this had pushed back our economic potential considerably, it makes clear one pathway towards economic growth that will be durable over a period of decades – if for no other reason that it will take decades to help our cities and towns recover.

A failure to properly transform our urban centres will risk continued reliance on once-off-builds that will ultimately undermine the possibility of achieving our national climate target goals which will have direct costs on the exchequer through fines, and increased costs of public service provision. These costs will be exacerbated by the indirect costs of climate change while also reducing our economic competitiveness through reducing our national productivity. Having our transport networks, childcare facilities and working hubs within close proximity will be a key element to undoing the damage that Covid-19 has done to Gender Equality through the imposition of extra work on women in the home and the highly gendered effects on employment. This need for hubs to be proximate to transport and childcare offerings highlights an issue with many of the existing remote working hubs which are often located in regional villages rather than the urban spaces of our cities and towns. If flexible working is to be a success it cannot be limited to villages for want of vision, it needs to become an option for all workers wherever they are based, and given the parameters of the National Development Plan almost all workers, by 2040, will be based in our cities and towns.

A principal goal of the revised National Development Plan must be changing people's vision of our cities and towns so that living in these urban spaces is something that people aspire to. They need to become welcoming and attractive places to live.

Retrofitting of our existing building stock

The other major area of capital investment will be retrofitting of our existing building stock. Even before the Covid-19 Crisis, vacancies were a plague upon our cities and towns. Underutilising our existing building stock forces us towards new builds which consume a disproportionate volume of our Carbon budget. Under most circumstances it is quicker, more sustainable, and cheaper to renovate the existing stock than it is to⁴ build new building. It also preserves the existing build heritage of our cities and towns which promotes ancillary industries such as tourism. Where repurposable buildings are not available, significant efforts will be needed to ensure that new builds can be viable.

Combined with legislation that allows for the conversion of existing vacant building stock to residential use this action has the additional benefit of increasing the supply of private and social housing which is a notable area of deficiency in the Country Report Ireland 2020⁵.

Civic Realm Investments

A government programme of action that is focused on putting town centres first will facilitate the economic rebirth of our city centres by expanding the opportunities for businesses to benefit from populations that live locally, populations that have both increased leisure time because they do not have long commutes, and also increased disposable income as a result of the low-cost travel that efficiencies of scale bring to the transport options available in urban areas.

⁴ [Town Centre First Initiative Six Pilot Towns Synthesis Report](#) Department of Rural and Community Development 2020

⁵ European Commission [Country Report 2020](#)

From an exchequer perspective, densifying our population through making it easier to live in urban areas will have the benefit of making the provision of public services both more efficient and more effective by concentrating future population growth in areas where service provision already exists (which avoids the stranded assets problem associated with a mismatch between where public service infrastructure exists, and where the demand is based).

As part of a stimulus programme a revival of our urban environment has two major beneficial elements. Firstly, there is huge amount of work that needs to be carried out, particularly with respect to public realm improvements which are easily accessible (even considering the limitations which construction work is under even with the public health restrictions which Covid-19 makes necessary). Secondly, the constrained economic environment that has existed over much of the last decade has led to much of the capital stock of our urban areas becoming degraded, this suggests that it will be possible to create large scale programmes which will be able to carry out a significant body of work, across the cities and regions, without triggering crowding-out effects that could result in inflationary pressures.

Within these public realm works, consideration should be given to ensure that sufficient charging infrastructure for electric vehicles is available throughout our urban spaces so that range anxiety does not limit the uptake of these technologies.

Active Transport Networks

Even if we were not facing an existential threat arising from our CO2 emissions resolving the transport problem would be amongst the highest priorities of the business community. As the Department of Transport's excellent research⁶ has demonstrated

⁶ <https://assets.gov.ie/19169/7c2814f5572d4ec7874a034fb0e72bea.pdf>

congestion is costing the city of Dublin €100's of millions each year, and soon to be billions each year. Using live travel data TomTom ranks⁷ Dublin as the 17th most congested city in their sample with typical commuters spending in excess of 213 hours in congestion in a given year.

Independently, Inrix⁸, using a very different methodology (which looks at the absolute economic cost of congestion by weighting congestion by the size of the city), ranked Dublin as the 53rd worst city for congestion that they examine. In terms of hours lost due to congestion (246 hours/commuter), Inrix ranks Dublin as the second worst city in Europe, behind only Rome (254 hours per commuter), with Dublin having the slowest average speed for the last mile of travel (among cities in Europe).

In 2018 TomTom's data has Dublin's congestion disimproving by 3% year on year, Inrix puts the rate of congestion increase at 4%. Both surveys charted a decline in commutability in 2018 relative to 2017. For TomTom, that 2017 data was an increase of 3% from 2016 at which point only 190 hours per year were added to the typical Dublin commute in 2016⁹. Where we have data about the National Development Plan growth cities, the findings are similar – while the duration spent trapped in congestion is related to the size of the city, the pace at which it worsens has been a cumulative 2-3% p.a. in all our major urban centres. Methodological changes make direct comparisons between current reports and earlier ones less reliable, but the trend, where available, has been consistent.

Our member chambers¹⁰ have strongly argued for increased ambition in how we plan our cities to ensure that they can become people friendly places to live and work again. Across the country our member chambers have worked with their Local¹¹ and

⁷ https://www.tomtom.com/en_gb/traffic-index/dublin-traffic#statistics

⁸ https://static.poder360.com.br/2019/02/INRIX_2018_Global_Traffic_Scorecard_Report_final.pdf

⁹ <https://www.independent.ie/irish-news/revealed-the-worst-irish-city-for-congestion-where-drivers-spend-more-than-the-average-work-week-sitting-in-traffic-every-year-35467969.html>

¹⁰ Dublin: The fifteen minute City

¹¹ Pedestrianisation 'will have to be' introduced in Ennis

Regional¹² Authorities to support the 15-minute-city, and 10-minute-towns concepts that support local business and both personal and economic health.

Public Transport Enhancements

Chambers Ireland¹³ have consistently argued for greater and better investment in our transport infrastructure not only because of the quality-of-life benefits, but also for the economic competitiveness benefits, and the environmental benefits.

Our member chambers are united in the vision of an Ireland where localities are transformed to become more person focused and getting the active transport infrastructure right is fundamental to that.

Our urban areas need to move towards locally active travel nodes, with efficient and affordable public transport linkages between urban nodes. This is as true for our smaller towns as it is for our larger cities. Access to our towns and cities will need to become less dependent on private vehicles like cars, if only because of their stranglehold is squeezing the economic life out of our urban areas.

Creating train lines that can adequately serve the population bases, not just along the Dublin-Belfast/Limerick/Cork routes but also including Dublin-Galway/Sligo needs to become a corner stone of the revised National Development Plan.

¹² Southern Regional Assemblies - [10 Minute Towns](#)

¹³ [Chambers Ireland Submission to the Department of Transport's Sustainable Mobility Policy Review – February 2020](#)

Decarbonisation of our electricity supply

We urgently need to see progress on the infrastructural elements that the greening of our electricity will be dependent on, in combination with the finalisation of the legislative/regulatory regime that will give certainty to potential projects, and the reform of our administrative system that will be needed if our planning regime is to be robust enough to ensure that these projects are to be delivered in a timely, fair and environmentally sustainable manner.

The Challenge of Delivering Upon Our Offshore Wind Aspirations

It is critical for the long run success, and the economic wellbeing of our country, that offshore wind is delivered efficiently and successfully by 2030. The existing regulations have delayed our development of an offshore wind industry which has damaged our country's capacity to meet our obligations under Climate Action (Goal 13) and Affordable Clean Energy (Goal 7). Reforms which do not deliver the 5GW necessary by 2030 or facilitate reaching that target while using grid assets inefficiently will hurt our economy's capacity to develop Sustainable Cities and Communities (Goal 11), Industry, Innovation and Infrastructure (Goal 9) and will ultimately undermine the challenge of creating Decent Work and Economic Growth (Goal 8).

Therefore, the Chambers Ireland Network is deeply interested and engaged with the success of the National Development Plan.

The development of our wind energy industry is one of the greatest economic opportunities for our country since we joined the European Economic Community. With

over \$5 Trillion in investment in offshore renewables expected over the coming decade¹⁴, the bulk of which will be in green hydrogen and wind energy, for the current administration a nationally critical task for the coming years will be facilitating our access to the coming green energy boom.

If successful, such a legacy project would see Ireland become energy self-sufficient in the first instance, it will allow us to export excess energy to the European grid, and will also allow us to take prominent position in nascent industries such as deep sea offshore windfarm construction, but will also allow us to be first movers in the skills intensive offshore platform industry, will give us a foothold in the export of green energy derived hydrogen/ammonia which will have the secondary benefit of reducing the carbon emissions of other state's through the substitution of green energy alternatives for industries such as aviation, shipping, and transport which require energy dense alternatives to the fossil fuels which they have a dependence on.

Concerns regarding the Climate Action Plan targets, and the revised EU 2030 emissions targets

If we are to meet our revised 2030 emission targets, we will have to reduce our total emissions by in excess of 20 million tons of CO₂. The Climate Action Plan aims to see half of that reduction arise through the migration of our electricity supply generation system to renewables. Half of that decline is to come from the increase in electricity generation using onshore wind. To increase this generation capacity of this sector we will need to double the scale of our onshore wind turbine fleet. Simultaneously we will need to create an offshore fleet which has a greater capacity that the entirety of our current onshore wind generated electricity supply.

¹⁴ Morgan Stanley Utilities Research Note 10 Nov 2020 "Energy Transition Titans: Big Oil's Big Threat Is Overblown"

Under the 2019 Climate Action Plan (which aimed at meeting the 40% reductions in EU emissions targets for 2030, rather than the 55% reduction that has been endorsed by the European Council¹⁵) the Irish fleet of onshore wind turbines would have had to double in capacity from 4GW to 8 GW in the coming 9 years. This scaling up may have to increase beyond that doubling if the new targets are to be met. The 2020 programme for government “Our Shared Future”¹⁶ envisages the creation of an offshore wind energy industry that will have expanded to supplying 5GW (larger than our current total land fleet) of electricity by 2030. However, **many of the projects which are in development may be unable to progress regulatory impediments in the planning process.**

The ambition for wind in Ireland over the coming decade is enormous as it requires us to more than treble the size of our wind energy production industry, the adoption of technologies new to the Irish electricity grid, and the upgrading/reinforcement/building of huge amounts of transmission equipment to bring the renewable energy from where it is generated to where it is needed. This effort requires a regulatory regime that supports that ambition to the fullest extent, and unfortunately our current regulatory system inhibits this. **The chief hindrance to meeting our climate goals is the absence of a planning system that facilitates offshore windfarm development. This needs to be the top priority of the Oireachtas.**

To meet those targets, we need a massive reduction in non-electricity-generation CO₂ emissions too. But this will only come through behavioural change and the adoption of novel technologies that allow for the electrification of our transport networks and making our heating systems efficient through the use of heat-pumps etc. These reductions are only possible if the electricity generation system has transitioned to clean energy. This dependency amplifies the impact of any failure to transition our power supply to renewables.

¹⁵ [European Council meeting \(10 and 11 December 2020\) – Conclusions](#)

¹⁶ Programme for Government: Our Shared Future

Upgrading our electricity grids

Our Electricity networks need upgrading, at the transmission level, to bring the electricity from where it is renewably sourced to where there is demand for it. Our low voltage networks need to be upgraded if they are to be capable of supporting the high-demand low carbon technologies (including heat-pumps and electric vehicles) which we will need if we are to reduce our carbon emissions to the 2030 targets.

A considerable body of work will be need to be completed if we are to ensure that the connection of sufficient wind generated energy (onshore and offshore) is possible to meet our 2030 renewables targets. This will need to be done with a view to maximising the utility of our existing infrastructure, such as through using hybrid connections while onshoring, and given the large variability in where these renewables will be sources, there will need to be large reservoirs of excess capacity built into our national grid which will also involve significant major new works if it is to be successful to ensure our capacity to maximise the renewable energy that is consumed.

At the consumer level Low Voltage networks will need considerable attention if they are to be suitable for Micro-Generation as envisaged by the Programme for Government, while an upgraded smart-metering system will allow for better efficiencies across the networks.

Reforming our planning system

A major concern of many of our chambers is the misunderstanding that has developed regarding the National Planning Framework's population projections, the Regional Spatial and Economic Strategies, and the County Development Plans/Local Area Plans. A review should be carried out to ensure that the Regional Assemblies are capable of delivering on their National Planning Framework mandate by reforming or filling any gaps or weaknesses within their constitution. One problem that we would highlight was the attempted downgrading of the Waterford City Region within the Southern Regional Assembly Drafting process, and Chambers Ireland would suggest that the weighting of political representatives on the assemblies should be shifted towards the population bases, rather than the geographic/regional weighting that is currently applied.

Many Local Authorities seem to be operating under the misconception that the likely population projections for 2040 are the upper targets that the Local Authorities should be aiming to provide provision for, rather than absolute minimum targets that they need to be able to provide services for. We know that many of the Regional Assemblies have advised constituent Local Authorities of this error, but Chambers Ireland believes that the appropriate Ministers need to ensure that Councils and Authorities around the country reinterpret how they view those population projections. Our concern is that unless councils and Local Authorities are not ambitious in how they create their Plans they will inevitably fall short of where they need to be come the end of this version of the National Development Plan,

Within the administrative sector we will need to see investment in An Bord Pleannála, to ensure that they have the capacity to manage the increased volume of infrastructural permissions that will be sought under the Strategic Infrastructure Act 2006. It is essential that decisions that are made will be robust enough to ensure that they survive the high degree of scrutiny that they will inevitably attract.

The National Parks and Wildlife Service will need a similar degree of investment as the offshore wind industry will be dependent on their being a secure and sufficient planning capability within the NPWS that can cope with the increased burden the finalised of the Marine Planning Legislation will place on it, given the critical role they will play as part of the National Marine Planning Framework/Marine Spatial Planning regime.

Our Regional Assemblies should take on a role where they offer technical shared services to their constituent Local Authorities - particularly with regard to intra-regional/inter-authority transport and energy networks where they should have a role to play in ensuring that the Local Area Plans and County Development Plans interact appropriately with the National Planning Framework Guidelines to ensure that decisions that are made are robust enough to survive review by the Office of the Planning Regulator, and the risk of Judicial Review.

Complementary to the nurturing of an effective, consistent, and robust planning administration across the state (this consistency is vital when many major investment projects over the coming decade will need to see permissions being granted by multiple agencies and authorities) will the introduction of a dedicated environmental court, modelled on the existing commercial courts, which will be resourced to such an extent that it will be effective in minimising the delays that planning permissions will otherwise cause in the development of the infrastructure we need to meet our Green Transition targets.

Investing in our port capacity

Finally, there is a need to act quickly if we are to be able to upgrade our port infrastructure if it is to be able to deliver the offshore wind. Capacity will have to be

created if we are to be able to maximise the window within which offshore construction will be possible. The longer the supply chains to offshore sites, the more opportunities for weather and other unforeseeable events to interrupt works, thereby lengthening the overall build time for those projects.

Given the long lead in times – port upgrade project schedules can often take many years to mature, particularly given the ongoing need to continue commercial activities – projects which start over the coming year will only be fully available in the 2030s at which point construction of windfarms off the west coast is expected to be commencing.

Meanwhile, along the Eastern and Southern Coasts the Operations and Maintenance activities which will be needed to support the 5GW of offshore wind that the Programme for Government foresees will place inordinate demands on secondary ports that were largely constructed in the 19th Century.

Consideration should be given to advancing plans for the development of Atlantic offshore wind generation projects, and the infrastructure they will need if we are to be landing electricity on the west coast, given the sea conditions, there is a short window of the year where construction offshore is possible along the west coast, which argues for early and sustained investment in port infrastructure to ensure we have the capacity to benefit from the investment which will occur. Should we not have construction port capacity along the west coast by the time we are building out there, our partner countries in the EU, and Britain, will capture the supply chains and industrial opportunities instead.

Research and Innovation

Key to the success of the Green Transition will be the development of new techniques that allow for the reduction in the carbon intensity of many high energy demand processes. These need to occur at both the energy production/transformation stage and also in the energy storage stage.

At the energy production level there is significant research needed to ensure the viability of floating offshore wind turbines, and also the opportunities that floating wave and tidal energy supplies are likely to have.

Large supplies of near zero marginal cost green energy will allow the development of new industries centred around the production of energy dense compressed Hydrogen for use in thermal plants, the heavy transport sector, or green ammonia for the aviation sector etc.

With thermal plants there needs to be increased research in the use of Green Hydrogen as a primary fuel feedstock along with options that consider the use of biomethane in combination with Carbon Capture and Storage technology that will be necessary to achieve net negative carbon emissions.

International Connections

The disruption that Brexit has caused to our supply chains, the legal status of Northern Ireland, the trade routes we use, importantly for the Connected Ireland chapter of the National Development Plan it will need considerable reworking if it is to be able address the challenges of Brexit.

Significant efforts to integrate the Belfast City Plan with the outline Drogheda-Dundalk-Newry nexus of the National Development Plan. In our Chambers Ireland GE2020

manifesto¹⁷ we called for considerable ministerial resources to be applied towards the infrastructural, economic, and regulatory impacts of government policy on border counties and Northern Ireland.

Beyond the island itself, support will be needed to open, and in some cases maintain, our connections through ports and airports to the wider EU community, and across the globe. To support alternative trade routes which are needed to avoid transit problems through Britain it may be necessary to invest in our air and marine ports so that they can broaden the range of available connections, increase capacity along those routes, and increase the frequency along said routes.

¹⁷ https://www.chambers.ie/wp-content/uploads/2020/01/Chambers-Ireland_Election-Manifesto-2020.pdf

Key Considerations for the “Review to Renew” Consultation

1. Is the overall level of public spending on capital investment correct?

With low domestic demand we should be supporting our economy

Given the current economic environment, both the excess supply of labour caused by the domestic economic depression, and the unparalleled access to cheap capital on the international markets, Ireland should be borrowing more money, locking in the low interest rates over very long bonds and investing more in quality, sustainable, and green infrastructure that can support our quality of life across the coming decades.

The vetting of our Capital Projects needs reform

We need to invest this capital wisely, drawing on international best practice, and importantly ensuring that proposals from state bodies and departments are vetted to ensure that they are credible.

Unfortunately, too much of our infrastructural development process seems to be geared towards shaping projected budgets so that they meet spending limits imposed by the Department of Public Expenditure and Reform, rather than accurately portraying the likely costs. This results in a lack of clarity in the specifications that are to be needed with results in revisions to the contract once it is underway which expands the eventual costs of the projects.

The costings for proposals need to be vetted by international experts against peer countries, with consideration for the fact that Ireland is an unusually expensive country to build large public infrastructure projects in, given the long delays to projects that our planning system introduces.

2. What Should the Capital Budget be spent on?

Our planning system needs reform

While not a large proportion of the capital spend it is vital that our planning authorities at all levels, from Local Authorities, our Regional Assemblies, through to An Bord Pleanála and the National Parks and Wildlife Service receive the supports that they need to ensure that our goals for the coming decade are achievable. This investment will be needed to ensure that any and all permissions that are granted will be capable of withstanding the high degree of Judicial Review that they are likely to experience as a normal part of the Irish planning process. Essential to this will be the creation of an Environmental Court that allows for speedy review of any challenges to development.

Our Urban Areas need to be transformed.

Making our urban spaces attractive places which will support the denser populations that the National Planning Framework projections expect them to be able to meet the needs of. This will require significant additional investment in transport networks (particularly Public and Active Transport networks), housing, the build environment, childcare, and broadband.

Our Electricity networks need to be upgraded.

The offshore energy resources that are available to us represent the greatest economic opportunity for indigenous wealth creation in the history of the state. We need to maximise our economic benefit from this and ensure that we capture

as much of the value chain as we can muster. With trillions of dollars to be invested globally in renewable energy over the coming decade Ireland is in an excellent position to reap the benefit from this shift.

We have, in the next few short years, the opportunity to transform the economies of our regional areas in a way that will benefit those populations for generations to come. It is of the most fundamental importance that this opportunity is recognised, communicated to the communities involved, and seized upon so that these disadvantaged areas can experience the benefits of the offshore energy boom that is coming.

3. What types of Capital Investment should be prioritised?

Urban investment

Active and Public Transport

Planning reform

Inter-urban Transport

Infrastructure to Support Decarbonisation

Grid Infrastructure

Port Infrastructure

Research and Development

International Connections

4. How should the management and governance of public investment be improved?

Improved Project Assessment Criteria

Projects need to have their cost accurately assessed, with international peer review a key element of the process.

In terms of their selection among conflicting options, projects need to be considered in terms of how they meet the needs of attaining the National Planning Framework densification targets, how they facilitate meeting our 2030 carbon reduction targets, the amount of our national CO₂ Budget that they consume, their long run viability in the context of a likely 2050 net-negative CO₂ environment, and their ultimate social benefit – all of which should be incorporated into a revised cost benefit model that considers them over their likely lifespan.

5. How is the National Development Plan affecting your region?

As a National Organisation Chambers Ireland does not have a view on the individual regions.

6. What is your feedback on Project Ireland 2040 communications?

The name is unfortunate, conflicting with the timeline of the National Planning Framework which created confusion in the lay audience. Often, using that name we have to spend time explaining what we are referring to.

The National Planning Framework/National Development Plan dyad is more useful in terms of communicating to our members and lay members of the community.

There has been an unfortunate turn where the far-right have taken the population projections of the National Planning Framework (which is often referred to a Project Ireland 2040) and conflate that with the “Great Replacement” conspiracy theory.

Chambers Ireland would highly recommend a rebranding of Project Ireland 2040 (if only to the National Development Plan) so that its purpose is clear and that its aims are not obscured and subject to wilful misrepresentation.

Secondly there seems to be a considerable miscommunication regarding the population targets associated with the National Planning Framework, and how they have been interpreted by Local Authorities around the country. The 2040 targets are often considered to be the target, rather than minimum target, that Local Authorities should be aiming for, whereas the Regional Assemblies

typically argue that Local Authorities ought to be aiming at targets that are up to 15% higher than the National Planning Framework projections.

As a network of business organisations which a strong interest in policy, and spatial policy in particular – given the unique geographical nature of the chambers network – we find that the communications are useful and informative. We are concerned however that ordinary members of the community are not as well catered for as an audience, and given the highly engaged nature of Irish people in the planning process we are worried that not enough is being done to explain how the National Planning Framework can make the lives of the ordinary members of our society better.

We accept that the Office of the Planning Regulator has a role to play in this, but given the relatively small staff and the limited resources that are available to that office, Chambers Ireland believes that more could be done to ensure that people can learn what positive impacts the National Development Plan is likely to have on their lives if more resources were made available for that goal.

7. Additional Observations