
Consultation on the Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation's National Development Plan Review

**Response from the American Chamber of Commerce Ireland
(AmCham) to the Department of Public Expenditure, Infrastructure,
Public Service Reform and Digitalisation.**

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The American Chamber of Commerce Ireland (AmCham) is the collective voice of US companies in Ireland and the leading international business organisation supporting the Transatlantic business relationship. Our members are the Irish operations of all the major US companies in every sector present here, Irish companies with operations in the United States and organisations with close linkages to US-Ireland trade and investment.

The American Chamber of Commerce Ireland (AmCham) welcomes the opportunity to make a submission to the Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation's public consultation on the National Development Plan Review.

The National Development Plan (NDP) is a core mechanism to deliver infrastructure projects of vital national importance. The successful implementation and delivery of projects contained within the NDP is an important step to ensuring the greater clarity and certainty necessary to maintain and grow Ireland's position as a destination for investment and business expansion.

With increasing population and ever-growing demand on existing infrastructure across society, it is crucial that Ireland continues to significantly invest in national infrastructure projects that will unlock future growth, productivity and competitiveness, and ensure that infrastructure delivers for the whole of society.

Road Networks

Ireland's road network forms a critical component of national supply chains and facilitating the transport of goods and services, while also creating environments in which businesses and communities can grow and thrive. Expenditure on existing road network maintenance is an important aspect of maintaining these linkages, however, there is an urgent need for progress to be achieved with regard to the delivery of key road projects.

This includes the Cork Northern Distributor Multi-Modal Road and the Cork Northern Ring Road, both of which have the ability to enhance the region's ability to attract further investment, to support the expansion of existing operations, and the attractiveness for, and retention of, talent.

Further the development of the Limerick Northern Distributor Road and the M20 between Cork and Limerick, would enhance the region's ability to provide greater mobility while also strengthening supply chains across the region.

Key roads projects also include the delivery of the Galway City Ring Road, and the need for cross-border cooperation with regard to the A5 route between Derry and Dublin. Both of these projects can address significant challenges for communities in these regions and increase the infrastructure offering to businesses.

Aviation Infrastructure

Ireland's airports play a pivotal role in connecting Ireland to the European Union, the U.S. and the wider world. As a small, open, island economy, investment and growth in the nation's airports provides significant potential for the to support future business development and Ireland's overall competitiveness.

Ensuring Ireland's airports are facilitated in realising its economic and connectivity potential through developing an infrastructure policy landscape that supports growth is essential. This will include reviewing the restrictions regarding the existing passenger cap at Dublin Airport with a view to unlocking a strong investment landscape into the future.

Furthermore, expanding the capacity and investment levels in Ireland's regional airports, including Cork, Donegal, Kerry, Knock and Shannon can provide stronger economic growth, and enhance Ireland's connectivity, which is a vital aspect in Ireland's ability to achieve long-term growth and investment.

Additionally, it is essential that investment in State-owned regional airports adequately reflects the significant existing economic contributions, and potential of, Ireland's regional airports in facilitating tourism, mobility in the labour market, ensuring balanced geographic economic growth, and supporting FDI investment.

Through inclusion within the NDP, and inclusion of Shannon airport in the Regional Airports Programme, direct support can be afforded to regional airports, allowing these operations to drive positive impacts on the region and surrounding communities. In accordance with European Commission regulations, should an airport have fewer than three million passengers per year the airport would be eligible for supports in relation to capital expenditure. Ensuring Ireland's Regional Airports Programme reflects this would allow for the inclusion of Shannon Airport within this Programme, supporting investments which would enhance aviation infrastructure and enhance the attractiveness of Ireland's regions for inward investment.

Coupled with the review of the National Aviation Policy and commitments made in the Programme for Government, this provides the Government with an opportunity to implement changes to support regional airport growth and further aims to achieve balanced regional economic development.

Public Transport

Ensuring the delivery of key public transport projects will be essential in the lifetime of the NDP. It is important that these projects are delivered without undue delay and that the introduction of enhanced public transport services provide for the needs of the population.

The development of MetroLink is a core project that will enhance connectivity within Dublin and provide for direct access to Dublin Airport. This will mark a significant step-change in the public transport offering within Dublin and result in a significant increase in the number of people utilising the public transport network. Further this will alleviate existing pressure on services in Dublin and diversify the travel pattern of workers, residents and tourists.

The introduction of a Shannon airport Rail Link will further enhance Ireland's capacity to connect key end-to-end journeys. Connecting Shannon Airport with the wider region via a rail link, as detailed in the All-Island Strategic Rail Review, offers a significant benefit for the economic and social development in the region.

The delivery of DART+ will also ensure that the capacity and frequency of services in the east would be enhanced. The operationalisation of this project would further aid in reducing carbon emissions within the public transport network, with greater scope for the electrification of the rail services.

The full implementation of BusConnects will further enhance the range of public transport options for commuters and allow for more efficient and timely journeys, building a modern bus network to accommodate the changing needs of the population.

Further advancement of the Cork Light Rail project would represent a positive step in driving new connectivity and easing the burden on existing services in the city. Consideration should also be given to developing similar public transport improvements in Galway city, with a particular view to facilitating access to the Parkmore Industrial Zone.

Housing

The delivery of housing is of critical importance to Ireland's ability to meet the needs of a growing population and to facilitate businesses to grow and to attract and retain domestic and international talent. In a recent AmCham survey, 34% of responding

members stated that housing was the number one challenge Ireland must overcome for their organisation to expand in Ireland, the highest of any category. This underscores the role housing has as an economic enabler in terms of Ireland's long-term attractiveness to investment and talent.

It is of paramount importance that the Government ensures the delivery of supply to both the private and rental housing markets, to enable future economic growth and to meet the needs of wider society. This will require continued multi-annual funding for housing with measurable targets to indicate progress, as well as in-built reviews of targets and key performance indicators.

As with other areas of critical infrastructure, meaningful planning reform will represent a vital step in alleviating delays in project delivery, streamlining the planning process, ensuring adequate resourcing of planning authorities and providing greater certainty and clarity as to the timeline of projects.

The Government's goal of building 300,000 homes by 2030 is a target that will require continued attention and effort in order to achieve. Such housing targets must be viewed as a floor, not a ceiling, in terms of delivery. The full enactment of the Planning and Development Act 2024 will aid with the delivery of housing and other infrastructure projects, and this progress should be built upon in terms of reform into the future.

Water

The delivery of sustained investment in water and wastewater services on a multi-annual basis will be key to ensuring that Ireland's water infrastructure keeps pace with demand. Water and wastewater projects have direct impacts on Ireland's ability to deliver housing, develop industry, and encourage future investment.

Critical water projects include the Greater Dublin Drainage project and the Eastern and Midlands Water project. With growing demand for water connections, a clear funding stream to support the work of Uisce Eireann will be vital to the delivery of these projects.

The Greater Dublin Area currently relies on the River Liffey as a single source for 85% of water supply. Potential disruption to this source could have significant impacts on the population and the business community. Further, it is anticipated that by 2044, the region will require an increase of supply of 34%. This highlights the need for greater

investment in Ireland's water infrastructure, both to upgrade existing infrastructure and to develop new projects that will have the ability to grow with demand.

The Eastern and Midlands Water Project, when delivered, will have the capacity to supply water to 50% of Ireland's population, making this a project of critical strategic importance. Projects such as these also help unlock new housing at a time of significant pressure in the housing market.

Energy

Continued investment in Ireland's electricity grid should remain a priority for Government in order to facilitate greater connectivity, upgrade existing grid infrastructure and provide security of supply in the face of increasingly powerful weather events and ease the burden on current grid capacity.

Enhancement of the electricity grid is of particular importance to the development of the renewable energy sector which relies on reliable grid capacity. Current constraints create an opportunity loss in energy production which have consequences for the growth of the sector.

Further, the development of energy grid capacity can unlock greater ambition for in terms of the expansion of business operations in Ireland and attracting future investment. With a clear roadmap for the development of Ireland's electricity grid, businesses can act with greater certainty with regard to growth and investment strategies. The delivery of improvements to the electricity grid will be critical to ensuring Ireland is best placed to attract such investments.

Interconnectors will continue to offer Ireland opportunities to increase the supply of renewable energy in the electricity grid and, importantly, facilitate future energy exports to the UK and Europe. A roadmap and funding model for future interconnector projects with the UK and Europe should be pursued with the view of increasing Ireland's energy connections with EU partners and the UK.

Education

In a recent AmCham survey of members, 63% of respondents stated that Ireland's greatest competitive advantage was its access to a highly educated and skilled

workforce. This underscores the importance of continued investment in Ireland's educational infrastructure across all levels of education.

Investment in higher and further education institutions is key to providing educational facilities in Ireland which are vibrant and competitive, and continue to enhance Ireland's internationally recognised educational reputation.

Through the development of state-of-the-art facilities across Ireland's higher education institutions, a greater focus can be placed on research, development and innovation. Building on the success of the establishment of Research Ireland, continued investment in Ireland's RD&I sector will put Ireland on the forefront of global innovation and present economic opportunities for Ireland to be a leader in new technologies and innovations.

The supply of student accommodation will also require the development of a multi-annual plan that addresses the current demand for student accommodation and also provides for planned demographic growth in the years to come. This will allow for greater certainty for investment in higher education institutions and facilitate increased clarity for students from Ireland and the EU and for international students. This will assist in Ireland's ambition to deliver greater access to education and to strengthen its position as a premier location for talent that will drive innovation and development into the future.

Moreover, to meet the demands of a growing population, it is vital there is continued investment in primary and secondary schools to support an educational environment that is matched with modern environments that support learning. This will lead to a strengthening of the talent pipeline in Ireland as individuals progress through the education system and enter the workforce.

Digital Infrastructure

Continued development of digital infrastructure across Ireland represents an opportunity for Ireland to lead digital research, development and innovation; and increase its attractiveness for international investment.

This is underscored by the growing role of artificial intelligence and the increasing importance of developing digital infrastructure to meet the changing needs of the population and the business community. In an AmCham survey of members, 96% of

respondents said continued EU investments in A.I. are important to continue the growth and expansion of operations in Ireland.

Further, the benefits of supporting the business community through digital infrastructure can lead to greater economic efficiency, productivity, supply chain optimisation, and cutting-edge innovation.

Harnessing the potential innovation brought by investment in the State's digital infrastructure can maintain and grow Ireland's position as a global digital leader. These investments will maintain Ireland's international competitiveness at a time where digital competition is increasing.

Building on the success of the rollout of the National Broadband Plan, Ireland must continue to develop digital hubs across the island and ensure that digital infrastructure supports the needs of workers, businesses and the wider society.

Investment in cyber security infrastructure will also play an important role in providing protection and confidence that Ireland's digital infrastructure is reliable, resilient and safeguarded, through leading cybersecurity developments.