



Western Development Commission

Submission on

Ireland 2040 – Our Plan: National Planning Framework

November 2017

WDC Submission Key Points *Ireland 2040 – Our Plan*

This is a summary of the key comments and observations contained in the Western Development Commission (WDC) submission on *Ireland 2040-Our Plan*, the Draft National Planning Framework. In general, the WDC would have hoped for a more focused document with clearer commitments although the WDC strongly supports a strategy to drive a better spatial balance of economic activity across Ireland.

Particular areas of concern for the WDC are:

- The WDC welcomes the inclusion of regional targets but considers there is very little in *Ireland 2040-Our Plan* which can help to deliver on targets either for the Northern and Western region or that will move Ireland beyond the ‘business as usual’ scenario.
- The focus of *Ireland 2040-Our Plan* is on city led development in the five named cities. As there is no city in the north west the strategic development needs of the area, including Donegal, Sligo, Mayo, Leitrim, and Roscommon, are not envisaged or prioritised. An urban centre such as Sligo should be identified and resourced to drive the development of the wider region.
- *Ireland 2040-Our Plan* has seventy ‘National Policy Objectives’ but little detail on how many of the seventy will be implemented. Despite these National Policy Objectives, the *Ireland 2040-Our Plan* is quite general and aspirational and the real detail is only in the target population growth and jobs growth and in details of planning mechanisms.
- *Ireland 2040-Our Plan* does not address the stated need for enhanced regional accessibility for the north west. Accessibility is only referred to in the context of ‘incremental improvement’ and ‘only after compact growth in urban areas’ is achieved.
- In relation to Ireland and Northern Ireland, too much priority is given to the development of the Dublin-Belfast corridor compared with the important and significant cross border interactions in the Derry/Letterkenny North West City Region.
- There is a serious definitional issue with ‘rural’ as areas as outside towns with a population of 10,000. This covers 80% of the population in the Western Region and 50% nationally. These are very significant proportions of the population and their needs should be addressed clearly and specifically.
- Under discussion of rural infrastructure there is no mention of transport (public transport, regional and local roads), or connection to primary and secondary roads, air access, rail or energy infrastructure for residents or enterprises in these locations.
- Much responsibility has been passed to RSEs and the NWRA has most challenging population growth target to meet. Beyond the five cities, it is suggested the RSEs will cover the broader regions and rural areas, without clarity about what will be committed for the regions, resourcing the RSEs and how they will ensure policy aligns with them.
- While *Ireland 2040-Our Plan* gives some indication of how the NPF will be implemented (mainly in terms of planning and capital investment, although the detail of that is not yet available) there is little reference to how ‘sectoral’ policy will be aligned with the NPF. There needs to be a clear implementation and monitoring structure put in place to ensure sectoral policies are aligned with the NPF, beyond that for capital investment and planning.

- Where conventional evaluation and appraisal techniques, like cost benefits analysis (CBA) methods are used to determine investment priorities, this ultimately supports ‘business as usual’ outcomes. Therefore a change to the conventional appraisal and evaluation methodologies used is needed in order to determine what projects become priorities.
- There is excessive focus in *Ireland 2040-Our Plan* on attracting international companies and insufficient consideration of indigenous sector, SMEs, micro-enterprises and sole traders. Similarly the focus on growing demand for a highly skilled workforce does not acknowledge the concurrent growth of low skill, low paid employment, meaning it fails to recognise the needs of this group.
- Employment growth in urban areas beyond the cities is very much presented as an afterthought and primarily for ‘accessible towns’ with a large catchment. What is the role or future for towns that do not meet these criteria? The NPF must address all types of spatial areas especially those areas that face greater challenges and therefore require greater public intervention, as private sector led development will be attracted to the stronger centres.
- There is a lack of clarity on the relationship between, and priority given, to the ‘Metropolitan Area Strategic Plans’ and the ‘Regional Spatial and Economic Strategies’. It is not clear if the MASPs are to be developed subsequent to the RSEs, implementing the RSEs at the metro level, or if they are to be developed concurrently.
- Though the role of third level education in supporting regional development is acknowledged, along with the development potential of Technological Universities, the only facility mentioned is Grangeorman in Dublin. The Institutes of Technology in the west and north and proposed Technological University there are important drivers and need to be named as such.
- There is a very significant focus on city led development but little explanation of how this will give rise to broader regional development. Given the timeline for publication of the NPF and the 10-year National Investment Plan, failure to designate any urban centres other than the five cities in the NPF means that regionally important large towns are unlikely to be prioritised for investment.
- *Ireland 2040-Our Plan* is based on one projection of future population and jobs growth which is presented as a certainty and given the time period to 2040, the certainty of projections is very limited. The NPF strategy should not be based on a single projection, but should include a number of possible scenarios for future low, medium and high growth. There is no detail provided on the of the assumptions underpinning the ESRI’s projections.

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Western Development Commission

The Western Development Commission (WDC) welcomes the publication of *Ireland 2040 Our Plan*: the draft National Planning Framework (NPF).

In this submission, the WDC first provides a summary of the overarching key comments on *Ireland 2040-Our Plan* the Draft National Planning Framework. This is then followed by a detailed page by page response to the issues raised and policy responses proposed.

About the Western Development Commission

The WDC is a statutory body established by government to promote, foster and encourage economic and social development in the Western Region. It operates under the aegis of the Department of Rural Development (DRD). The WDC works in co-operation with national, regional and local bodies involved in western development to ensure that the Western Region maximises its full development potential. It does this by:

- analysing economic and social trends and making policy recommendations;
- promoting the Western Region through the LookWest.ie campaign;
- supporting the rural economy through facilitating strategic initiatives (e.g. renewable energy, creative economy, rural tourism); and
- providing risk capital to businesses through the WDC Investment Fund.

One of the functions of the WDC is regional policy analysis. The WDC seeks to ensure that government policy reflects the needs and maximises the potential of the Western Region in such areas as infrastructure, natural resources, enterprise and rural development. It also tracks the implementation of policies and recommends adjustments as appropriate. This means that the organisation has a well thought out approach to regional development and issues for rural regions which has informed the preparation of our submission.

The Western Region is a predominantly rural region; almost two thirds of the population live outside settlements of 1,500 people (Census of Population, 2011). Because of this, the WDC is particularly cognisant of the impact of any changes in government policy on rural areas.

Contact Details

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WDC Comments on ‘Ireland 2040 Our Plan: Draft National Planning Framework’

Foreword

p. 5, By 2040, we know that Ireland will be home to an additional one million people. We will need at least an extra 600,000 jobs and half a million additional homes.

Ireland 2040-Our Plan is based on one projection of future population and jobs growth which is continually presented as a certainty. Given the time period to 2040, the certainty of projections is very limited. The NPF strategy should include a number of possible scenarios for future growth, low, medium and high.

Furthermore, no detail of the assumptions underpinning the ESRI’s projections is provided.

p. 6-7, as the NPF’s successful implementation requires coherence across all sectoral Departments it would benefit from the clear commitment of all government Ministers (Education & Skills, Health etc).

Ireland 2040 – Overview and Key Messages

p. 8, *Ireland 2040 will be followed and underpinned by supporting policies and actions at sectoral, regional and local levels.*

Chp 9 outlines how implementation of *Ireland 2040-Our Plan* is planned at regional and local levels but there is little or no reference to how ‘sectoral’ actions will be aligned with the NPF. There needs to be a clear implementation and monitoring structure to ensure sectoral policies are aligned with the NPF. This goes beyond the alignment of the NIP, which only refers to capital expenditure, and also beyond the role of the ‘Office of the Planning Regulator’ which will only address physical planning issues.

(1) Putting in place a new National and Regional Development Strategy for Ireland

4th bullet. All previous bullets on urban areas and regions contain specific percentage targets. A specific target for ‘smaller towns, villages and rural areas’, rather than the vague statement ‘a significant proportion’ should be included here to aid monitoring.

(2) Backed by Legislation and an Independent Office for Planning Regulation

2nd bullet. Given the cross-sectoral, cross-Departmental scope and ambition of the NPF, it is inadequate for monitoring of its implementation to solely rest with the Office of the Planning Regulator which will have competence in physical planning.

(3) Intrinsically Linked to a New 10-year National Investment Plan

2nd & 3rd bullets. No reference is made here, or in Chp 9, to the monetary value of the ‘National Smart Growth Initiative’, the division of the total between the ‘urban’ and ‘rural’ Smart Growth Initiatives or to what extent it is ‘additional’ funding. The final NPF needs to set out a specific monetary commitment to this initiative with indicative allocations to ‘urban’ and ‘rural’ areas.

(4) Supported by Strengthened and more Environmentally Focused Planning at Local Level

1st bullet. Here and in Chp 9 there is a lack of clarity on the relationship between, and priority given, to the ‘Metropolitan Area Strategic Plans’ and the ‘Regional Spatial and Economic Strategies’. It is not clear if the MASPs are to be developed subsequent to the RSEs, implementing the RSEs at the metro level, or if they are to be developed concurrently.

p. 12. There is a diagrammatical overview of the Irish planning system and how the NPF and RSEs will fit into this, but this does not show how the NPF will influence other aspects of government policy aside from planning.

Preface

Changing and Growing Ireland p. 16

The assumptions underlying the ESRI's projections need to be clearly outlined and a number of different scenarios presented.

p. 16, The ESRI is also projecting an additional 660,000 jobs to 2040. In line with international trends, the ongoing shift to a knowledge economy and the growing role of services will continue to change the nature of work, sustaining demands for a more highly skilled and educated workforce.

Global trends point to growing divergence in future jobs growth, with the strongest growth in highly skilled jobs and low skill, low pay service jobs, with a relative loss of 'middle' skill jobs. If the NPF only focuses on the growing demand for a highly skilled workforce, and does not acknowledge the concurrent growth of low skill, low paid employment, it cannot effectively plan for future patterns of growth.

1. Ireland 2040 - Our Plan and National Planning Framework

1.1 A Vision for Ireland in 2040 p.18

Opportunity

p. 19, *tackling social disadvantage and eliminating significant differences in living standards between different parts of Ireland.* There is no explanation as to what are significant differences. How is this to be measured or monitored?

Connectivity

p. 21, ... *our communities and places are functionally connected and it is through these interactions that regional and local growth drivers can be effective.* The nature and functioning of these 'interactions' are critical to development of both urban and rural areas, however they are not explained or explored in *Ireland 2040-Our Plan*. It is assumed that growth of the cities will lead to growth of their 'city region' but there is no explanation of how this will happen. The NPF needs a clearer statement of the functional interactions between places, with recognition that there are different types of interactions.

Rollout under the National Broadband Plan (or at least the State funded element) has not yet started. Contracts for the National Broadband Plan are not expected to be signed until 2018 with initial rollout to occur in late 2018/early 2019.

p. 21, *There is also a requirement to strengthen our electricity transmission grid and to develop more international connections.* It is not clear how the strengthening of our electricity transmission grid is to be implemented. For example planning of the energy grid is decided at a distance from government policy, as the recent example of Grid West illustrates (see Chp 6).

p. 21 ... *a reasonable target for most people to have no more than a 30-minute commute time to work.* Is this in fact a target of *Ireland 2040-Our Plan*? Is it to be achieved in 2040? How is 'most people' to be measured? Nationally the average commute for those at work in 2016 was 28.2 minutes, so it is not clear what improvements, or where, are being considered.

It is important to understand that many people migrate to urban congested centres especially Dublin, to seek jobs and have to endure long commute times. If more employment was located in regional centres then it is likely many would have shorter commute times, with much less investment required in supporting transport infrastructure.

Self-Reliance

The benefit of making the transition to a low-carbon economy is that a reliable, sustainable and affordable low-carbon energy system would make us a global "go-to" location for enterprises and activities that require energy but without environmental impact. Unless this is implemented fairly quickly we will be very far behind other countries and, rather than gaining competitive advantage, we will be struggling to catch up.

1.2 The National Spatial Strategy (NSS) – Lessons Learned p. 23

p. 23, *The Report [Word Bank] considered it preferable that spatially balanced growth within a country's borders should come thereafter, only when overall national convergence has been*

achieved. This World Bank view is not a view that is widely supported and is contradicted by the *Ireland 2040-Our Plan* itself as well as IMF research.

This statement implies that the objective of spatial balance is a 'luxury' for periods of economic growth and it is appropriate to abandon it during economic downturns. This brings into question the Government's commitment to implementing the NPF during the economic downturns which will inevitably occur in the period to 2040.

Recent global trends indicate that the greatest global divergence is taking place within countries, even as convergence takes place between countries. There is growing recognition globally (IMF, 2015¹) that rising income inequality militates against growth. Income inequality in Ireland has a spatial pattern, with highest levels of income in Dublin (CSO County Incomes) and highest levels of poverty in rural areas (SILC).

1.3 How the National Planning Framework will be Different p. 24

Ireland 2040-Our Plan suggests it will be different from the NSS partly because of its regional implementation through the RSES, but there is very little explicit link between the RSES and the NPF.

1.4 What Happens if We do Nothing? p. 24

3rd bullet, *Without this focus and concentration, the wider area may suffer potentially irreversible decline, and failure to optimise regional performance will result in unsustainable pressures on Dublin, with national performance suffering as a result*. This 'failure to optimise regional performance resulting in unsustainable pressures on Dublin' is already occurring and contests the World Bank view cited on p.23.

4th bullet *priority must be given to investments which produce the greatest cultural, economic, environmental or social benefits*. Using criteria based on producing the greatest benefits is most likely to support the greatest population centre. This method is not likely to support the potential of other locations. Also, this is the criteria that currently applies and has given rise to 'business as usual' scenario. Surely appraisal methodologies have to change to accord development needs and investments in other centres a greater priority in order to effect any change and achieve the targets set in *Ireland 2040-Our Plan*?

1.5 What Success Looks Like - Objectives and Vision p. 26

The four high level objectives are very vague. There should be an objective to rebalance population and economic growth from the current pattern so as to ensure all regions' performance is optimised. The extent and degree of change can be explained later.

Ireland 2040 Vision p.27

Given the targets for regional population and jobs growth are central to *Ireland 2040-Our Plan* there should be some element of the Vision that refers to spatial fairness or balance.

Point no. 6. **A collaborative society** in which our cities, towns, counties and regions engage in new partnerships that benefit people, communities and businesses, both locally and internationally. This is not explained or discussed in the rest of the document.

¹ <https://www.imf.org/external/pubs/ft/sdn/2015/sdn1513.pdf>

2. A New Way Forward

2.1 Ireland 2040 - Principal Elements of Strategy p. 28

New governance arrangements are essential to the success of *Ireland 2040-Our Plan*. The way such arrangements and structures will work to ensure co-ordinated implementation should be described more clearly.

It is not clear, aside from the planning process, how the NPF will influence other groups, interests or investors to adhere to the Framework.

The extent and mechanisms through which vertical alignment (capital and other investment) and horizontal alignment (across Government Departments) will occur is not clear.

Horizontal alignment across Departments, not only in capital expenditure but also in current expenditure and public sector employment, will be the most important determinant of the NPF targets being met, but there is no structure outlined in *Ireland 2040-Our Plan* to ensure this will happen. What mechanisms will be used to ensure that Government Departments, agencies and State Owned Enterprises (SoEs) align their capital, current and employment planning with the NPF?

Integrating the Environment into Planning for the Future

A significant amount of population and employment growth is to occur in the five cities, all of which are coastal with rivers running through them, the extent to which flood risk provisions will be incorporated into the city development plans of MASPs needs to be discussed and the potential cost of such concentrated development needs to be considered.

There is a presumption throughout *Ireland 2040- Our Plan* that concentration of development is automatically more environmentally friendly. This is not always the case and appropriate investment in water and waste water treatment, in social housing and public services needs to be made. Without this, social disharmony can result and there can be degradation of the urban environment.

ELEMENTS OF THE STRATEGY (graphic)

A weakness of *Ireland 2040-Our Plan* (a spatial planning document) is that it does not contain any meaningful maps.

Our Capital

No sense given here that the precipitous growth that is occurring in and around the capital will be contained or managed in any other way than 'business as usual'. Jobs growth is only mentioned in relation to the capital but it is perhaps even more essential elsewhere.

Our Regions and Rural Fabric

There is a reference to *incrementally* improving access to the north west but this is not a sufficient commitment. If the north west² is to develop and be able to meet its growth targets there must be **accelerated** investment in infrastructure improving access and connectivity and providing the large towns with the capacity to grow.

² Including Donegal, Sligo, Mayo, Leitrim and North Roscommon

While there are many economic opportunities based on natural assets in the north west and it is important to support them, it is also essential to ensure that the connectivity infrastructure and capital assets as well as the social infrastructure in terms of education, health and facilities are in place. This would help to ensure that other economic opportunities, especially those in high value sectors, are available to all regions as well as to cities and that there is not excessive focus on natural resource activities, which are usually low value added, to stimulate regional development. Otherwise the gap between regions will continue to widen.

2.2 Strategy Development p. 32

It is suggested in the draft *Ireland 2040 - Our Plan* that *Practical experience and research shows that in an economy and society such as Ireland's, simultaneously fostering economic growth on the one hand and spreading it out smoothly or evenly across a country, is neither realistic nor practical.* (p32). No source or reference is given for this very strong, debatable statement and nor is it made clear why it would apply to Ireland. This statement seems to undermine the entire basis and purpose of the NPF.

It should be recognised that economic growth is occurring in most places, but the degree of economic activity differs. This is partly reflective of the relative levels of investment which have been made in different places. Places with good infrastructure and good connectivity are in a better position to develop than those that are relatively inaccessible and lack critical infrastructure and a policy focus on their development.

Much is made of how Dublin needs to develop to benefit Ireland as a whole, so the arguments are made to invest in significant infrastructure there. Little is said about how Ireland needs its regions to develop to benefit the country as a whole, and the necessity of investing in critical infrastructure which has been long underfunded or delayed, or the need for enabling policies which could allow regions to contribute more to national development.

Until now policies to effect both economic growth and 'spreading it out' have been poorly implemented, or not implemented at all which makes it difficult to judge whether they might be successful.

There is no reason that what is termed 'national' infrastructure investment should only occur in Dublin. We need to have national centres better spatially located, more accessible to all parts of Ireland, providing some level of regional stimulus, similar to that which occurs in Dublin when, as the capital city, it captures many of the 'national' investments.

It is suggested in the draft *Ireland 2040-Our Plan* that there is potential for growth which could be transformational by having six specific policies outlined in bullets (p.32). These policies could be transformational but there are no specifics about how, and when they will be introduced.

It is noted that potential outcomes were assessed until a realistic, reasonable, viable and implementable option was identified to form the basis of a core strategy for *Ireland 2040 –Our Plan* (p33). The background documents and basis of the development of the strategy should be published to show what potential outcomes were assessed and how the options outlined in the draft *Ireland 2040-Our Plan* NPF were selected.

It is noted that at a national level location, relative scale and proportionality are more important than number in allocation of projected future growth. This is debatable. If targets are not clearly set out their achievement cannot be assessed or monitored. If, as noted, the targeted approach is recursive, (which seems to mean that it can be varied according to the success or otherwise in relation to its achievement) it becomes a moving target. Will the population, employment growth and housing targets set out in the NPF be continually reviewed and changed? If so, who will decide how and when they will be changed? What will be the consequences for regions which do not achieve their targets or exceed them greatly?

2.3 Growing the Regions - By How Much? p. 34

It is not clear how the regional targets differ significantly from the 'business as usual' scenario and whether the targets indicate a real shift from projected trends. It does not appear that there is to be a concerted effort to constrain Dublin's development, it seems that change and development of the regions will only occur if regional cities manage to compete effectively with Dublin. Achieving this will depend on how much investment in, and commitment to, the development of the regional cities takes place.

Ireland 2040- Our Plan focuses more on investment needed in the GDA and is less specific about what is needed elsewhere and what investments will actually be made in regions and regional cities. This lack of specificity is most acute in relation to the north west.

National Policy Objective 1b

While population growth targets are given for the three regions there is no information about what kind of population growth is expected (in terms of age profiles, migration or births). This is particularly important in the Northern and Western region where population growth has been less than that in the Eastern and Midland region.

National Policy Objective 1c

There is no indication as to where the jobs targets have come from, what they are based on or why 50% of them are expected to be in the EMRA. How do they tie with the projections for the increase in the number of older people (over 65)? Are these increases realistic in that context, or is there expected to be an increase in older workers?

In the brevity of the presentation of the targets no context is given about what demographics are expected in Ireland in 2040 and how the jobs targets might fit with this. It is not clear if the 'jobs' target refers to full-time jobs, full-time equivalent or all types of jobs

While there are jobs targets, there is no reference the Regional Action Plans for Jobs (APJs) in *Ireland 2040-Our Plan*. There is no indication of how these regional jobs targets are to be met, how the NPF will be aligned with other job creation strategies or whether these job targets are consistent with the regional jobs targets in the Regional APJs.

2.4 How to Build Stronger Regions - Accessible Centres of Scale p. 36

This section recognises that poor accessibility, because of lack of investment in infrastructure and connectivity, is a causal factor in lack of development in some regions. It should be remembered that lack of infrastructure and connectivity are the result of choices made by government and lack of government priority on improving regional infrastructure and connectivity.

The weak urban structure of the north west is not addressed in the document although its focus is on urban or city-led development. No large town, such as Sligo, is clearly designated for development in the north west with priority given to its infrastructure or connectivity. Instead, it is suggested that accessibility will increase only by *incremental improvement* and *only after compact growth in urban areas* is achieved. This does not demonstrate any real commitment to addressing structural weakness in peripheral regions, in particular the north, west and midlands, and there is no clarity or commitment in *Ireland 2040-Our Plan* to addressing this.

National Policy Objective 2a

Huge responsibilities are to be given to the Regional Assemblies and to the City & County Development Plan processes but there is no mention of how they will be resourced to develop or implement the plans, nor what support they will receive or how their decisions will be aligned with sectoral and smaller scale capital spending to ensure implementation at a regional level.

While it is positive that employment and population growth is to be targeted to occur within a functional area to reduce long distance commuting, there is no definition or mapping of 'functional areas' and there is no indication of the scale of functional areas. It would be useful to include the target from p. 21 *a reasonable target for most people to have no more than a 30-minute commute time to work here*, to define the areas within which jobs and population growth should occur.

National Policy Objective 2b

At least half (50%) of future population and jobs growth will be focused in the five Cities and their immediately adjoining suburbs with a target of around two-thirds (66%) to be focused in the cities and their suburbs together with a number of large regionally distributed towns and their environs to be identified through the Regional Spatial and Economic Strategy (RSES) process.

This sets a target of 16% of population and jobs growth to occur in a number of large regionally distributed towns and environs but none are named. A small number of strategically located towns need to be named and identified in the NPF, and prioritised for development. For the Western Region; Sligo, Athlone and Letterkenny (as part of the North West City Region) should be named.

National Policy Objective 2c

Accessibility to the north-west of Ireland and between centres of scale separate from Dublin will be improved, focused on cities and larger regionally distributed centres and on key east-west and north-south routes. (p. 37)

As there is no city in the north west of the Republic of Ireland (i.e. Donegal, Sligo, Mayo, Leitrim and north Roscommon), it is therefore essential to identify a single regional centre to perform the functions of a key city in this area. This needs to be done in *Ireland 2040- Our Plan* and not left to the RSEs. Sligo is the best located centre to serve the wider region and it needs to be very clearly identified and prioritised for investment in the NPF and NIP if there is to be any chance of meeting the NPF targets and developing the north west.

2.5 Should we Build Compact or Sprawling Urban Areas? P. 38

There is a lack of information about the evidence and analysis which underlies the decisions in *Ireland 2040- Our Plan* and while all methods for unlocking regional potential are to be welcome there is no clarity about what *getting the physical form and location of future development right offers the best prospects to unlock regional potential. (p 38)* really means in terms of practical regional development policy.

National Policy Objective 3b and 3c

Table 2.1 provides regional targets and targets for the cities (Galway in the NW Region). Under these a lot of responsibility has been passed to RSEs without clear commitment to providing them with the resources to conduct analysis, implement and monitor the Strategies. Sligo should have been named in this table and population and housing targets given for it, to make clear the necessity of developing a major urban centre in the north west.

The NWRA has the most challenging targets to meet in terms of population growth with a larger proportion to occur in areas outside the city than in the other regions, and while commitment to this target for the north west is very welcome *Ireland 2040- Our Plan* does not give any detail on how it is to be achieved, what infrastructural investments might be made and how employment growth can be achieved.

Targets for population and housing are divided between the cities and elsewhere in the regions. However targets for jobs are not divided between cities and elsewhere. **A region could meet its jobs target with 100% of its jobs created in the city / cities.** National Policy Objective 2a states *Population and jobs growth will generally be aligned to occur within the same functional area* therefore the jobs targets also need to be clearly divided between the cities and other areas of the regions.

3. Making Stronger Urban Places

3.1 Introduction p. 40

By separating urban and rural there is no discussion of how developing urban areas are supposed to benefit rural areas and help them to develop. This is assumed throughout the document but there is no evidence or discussion of the mechanisms by which this happens and what kinds of development or benefits for rural areas are likely to arise.

3.2 Why Urban Places Matter p. 41

p.41 ... *the edges of cities and smaller towns within commuting distance of larger centres have become over developed...* It is important to understand why this has occurred. A key factor is the desire for people to live in regional centres but, because there are insufficient relevant employment opportunities in the individual centres, a two-person household may access employment in adjacent urban centres. For example where one works in Galway and the other in Loughrea/Gort/Tuam or further centres in Athlone/Limerick/Castlebar.

Economy/prosperity p. 42

Discussion is of *internationally mobile investment* largely in *information/knowledge economy* and then of *domestically trading companies*. This excludes Irish owned SMEs trading internationally and also foreign companies in manufacturing e.g. medical devices. This is a highly partial understanding of the enterprise base and quite Dublin centric.

Domestically traded companies are said to be distributed throughout the regions. While this is true, it seems implied that mobile international investment is not really a policy for all regions/centres? Overall, there is excessive focus on attracting international companies and insufficient consideration of the needs of indigenous sector SMEs, micro-enterprises and sole traders.

It is evident that, albeit often at a smaller scale, mobile investment is attracted to other centres, like Galway, Limerick and to a lesser extent Sligo. It is imperative that this trend in regional centres is fully supported so that these centres and regions can realise their potential and deliver on the targets in the draft *Ireland 2040-Our Plan* NPF.

Dublin Docklands p. 42

The why and how of Dublin Docklands is important as it illustrates the importance of policy and policy instruments such as tax laws in driving development and change and illustrates that if this policy had been applied to another centre it may have been just as successful. *The Finance Act, 1987 (Section 30) allowed for the designation of an area exempt from normal taxation laws - the IFSC. The importance to the IFSC of the 10 per cent corporation tax rate introduced in 1987 cannot be overstated³.*

Physical/Environmental p. 43

p. 43. *One of the principal benefits of a focus on Ireland's urban places as a new way forward for future growth and development is that it will reduce harmful impacts on the environment. At the most basic level, reduced land take will preserve agricultural land and habitats. Utilising existing infrastructure, buildings and sites and reducing the need to travel long distances will reduce energy consumption and carbon emissions.* There is no evidence given for this and it seems to be an

³ <https://www.irishtimes.com/business/is-it-time-to-change-1.935609>

assumption. There is an alternative scenario which can increase sustainability in line with the current population distribution that could include:

- Jobs more spatially balanced in accordance with where people live.
- Better options for remote working.
- Increased use of electric vehicles (EVs).

National Policy Objective 6

There needs to be a far more considered discussion of the roles and functions of urban centres of different scale, how these are changing and the future vision for the role of these centres (particularly other than the five cities).

Metropolitan Region p. 44

The 'metropolitan region' and 'city region' are defined here, but there is no map to illustrate the 'city region' of Ireland's five cities. A very strong 'city region' approach is being taken in *Ireland 2040- Our Plan*, but it does not show what the city regions are. Giving a definition without mapping it is meaningless.

3.3 Ireland's Urban Structure p. 44

There seems to be inconsistencies between the analysis and identification of issues and the policy prescriptions to address these. So, *the loss of people, but also of potential* that is identified (p. 45) and *the overall urban structure remains relatively weak and focused on Dublin* (p. 44) is then followed with National Policy Objective 7 to *Strengthen all levels of Ireland's urban structure with a particular focus on Our Capital, Dublin....followed by all other urban centres.*

p.44. The strongest urban influence north of Galway is Sligo and the strongest urban influence north of that is Letterkenny/Derry City. These are facts and by not naming these significant urban centres in the Republic of Ireland (e.g. Sligo, Letterkenny), while naming an urban centre in Northern Ireland (Derry City), is an implicit downgrading of their role.

p. 45. ... *it is considered that most small and medium size towns in Ireland with a population of less than 10,000 people, unless within the immediate or 'metropolitan' catchment of a city, are predominantly rural in character ...* If small and medium sized towns are to be divided – with those within the metro catchment treated as 'urban' and those outside a metro catchment treated as 'rural' – it is necessary to indicate which towns fall into the two categories. As the metro catchment of the cities is not mapped anywhere in the NPF it is not possible to distinguish between these two type of towns.

This definition of rural accounts for 80% of the population of the Western Region and their needs cannot be fully met through specific 'rural policy' and must be core to policy across all Government Departments.

p. 45 (endnote 16) The discussion of decline is based on change from 2011-2016 which is a very short time period to consider when planning a document for 24 years. This is compounded by the extreme patterns of cyclical boom, bust and boom again of recent growth. It would be useful to have more information about this and the assumptions on which it is based as well as a longer term perspective.

There is also the issue of cause and effect. Little investment or jobs focus in many regions has meant population has gone elsewhere, to places with more investment and more focus. Job creation in Dublin and to lesser extent other cities has been a key driver.

National Policy Objective 7

3rd bullet. This bullet needs to specify one large town in the Northern and Western Region to be the main focus and to play a city-like role for the region. Sligo is the most strategically located town and should be specifically identified here. Given the ambitious growth targets for the region, strengthening the urban structure of the northern and western region needs to be identified as a key investment priority.

National Policy Objective 7a

As with National Policy Objective 7, we can only presume that the focus of the National Smart Growth initiative will be similarly focused on Dublin in the first instance. As such these policy instruments are not likely to deliver on the objectives of regional population growth set out in National Policy Objective 1b.

3.4 Planning for Ireland's Urban Growth p. 47

National Policy Objective 8

Growth in Ireland's cities and towns should be 'proportionate' as set out in Table 3.1, but Table 3.1 does not include targets for towns. The regionally significant centre of Sligo should be included in the table.

3.6 Ireland's Large Regional Towns p. 48

Targets for large regional towns are only for population, with no target for jobs for the towns. As pointed out in Table 2.1, as well as assigning regional targets for population and housing among the cities and other towns in each region, the NPF also needs to assign the regional jobs targets between the cities and other towns.

p. 48, In recognition of a significantly weaker urban structure in the north and west of Ireland, overall targeted population growth for large towns with >10,000 population in 2016 within the Northern and Western Regional Assembly area, should generally be 40%, or almost twice projected national average growth.

This is a very ambitious target and achieving it will need significant resources and direction, none of which are identified or set out in the draft *Ireland 2040-Our Plan* NPF. It also places a huge onus of responsibility on the Regional Assemblies and the NWRA in particular and the significant urban centres of Sligo and Letterkenny as the key drivers in the region.

p. 48. It is appropriate that the Regional Spatial and Economic Strategies (RSEs) for each Regional Assembly area address the potential of large towns and their surrounding regional catchments in conjunction with consideration of growth targets for cities and smaller towns and rural areas. This is a difficult requirement for the RSEs as the development of these towns will require significant resources, both financial and management, and it is not clear what will be available to the Regional Assemblies to achieve these, not just in the developing the RSEs but more importantly in their longer term implementation.

3.7 Urban Employment Growth p. 49

p. 49, *In addition to the five cities, there are opportunities for other urban areas and in particular well connected towns that are accessible to a significant population catchment and/or can offer a good quality of life, to accommodate employment growth.* Well connected or well located? Some of these urban centres, which are targeted for 40% growth (p. 48) in the NWRA area, are not very well connected, though they may be well located to serve as a driver for their region. These towns need to be named and the need to improve their connectivity should be prioritised so that they have some chance to achieve the planned targets.

Employment growth in urban areas beyond the cities and primarily for ‘accessible towns’ with a large catchment. But what role or future for towns that do not meet these criteria? The NPF must address all types of spatial areas and not ignore those areas that face greater challenges and therefore require greater public intervention, as private sector led development will be attracted to the stronger centres.

National Policy Objective 9b

This objective is extremely vague and non-specific. It does not provide any direction or sense of importance to achieving the jobs targets set out for the regions.

3.8 Achieving Urban Infill/Brownfield Development p. 50

Strategic Employment Growth at regional and local level (box) needs to recognise the role of state agencies, in particular IDA, EI and LEOs. There is a narrow focus on resource and utility infrastructure. If we are to plan for population and employment growth in particular locations, then the role of these ‘job creation’ agencies is critical.

3.9 Enabling Growth in Ireland’s Cities

Dublin

2nd bullet. Greenfield development and public transport corridors identified for Dublin but for the north west on p. 123 it notes *Investment in connectivity first without urban consolidation measures will likely worsen the current trends towards sprawl.* Why is there a sequential approach applied to projects in the west/north west?

13th bullet. Not clear what routes to Dublin Airport from the west and north west are being considered.

Galway

Unlike for Limerick, Cork and Waterford, regional connectivity is not mentioned for Galway, although the north west is considered the least accessible and is identified earlier as a priority. There is no mention of Galway’s links with its ‘city region’ or northwards to Sligo. For example improved road access north of Tuam is required.

There is no mention of rail transport and services. The longer term role of rail, serving a population that is growing, and with an increasing need to reduce carbon emissions, positions rail as an increasingly important travel mode. The Dublin-Galway line has high patronage levels (second after

Dublin-Cork⁴) and improved service levels, journey times and electrification should all be considered as part of long-term planning.

Galway Port is planning a large expansion to accommodate cruise ships and freight and should be cited as an enabler.

Sligo

There should be a similar section on growth enablers for Sligo focusing on what it needs to develop and drive the Northern and Western region, particularly considering the ambitious growth targets for the Region.

By focusing only on the growth enablers of the five cities, all located outside the Northern and Western region apart from Galway which is located at the very southern edge of the region, the growth enablers and infrastructure needs of this region, comprising over a third (36.2%) of the land mass of Ireland are ignored.

If the NPF is to provide a framework for investment then it should not exclude significant elements of the infrastructure required for a large part of the country and its population. Furthermore, as the targets set for the Northern and Western Region are very ambitious, speedy investment in improved accessibility is required. Growth enablers for the Northern and Western Region include:

- Atlantic Economic Corridor: Road network north of M18, Tuam to Letterkenny.
- Rail services: The Dublin-Sligo line has the third highest rail patronage levels in the country.
- Ireland Airport West, Knock.
- Galway Port and Killybegs port, 2nd largest fishing port in the country.
- Institutes of Technology at Galway/Mayo, Sligo and Letterkenny and their Connacht/Ulster Alliance plans for Technological University status.

⁴ National Transport Authority, Irish Rail. Rail Review 2016, p.17

4. Planning for Diverse Rural Places

The definition of 'rural' used here covers 49.8% of the national population and 80% of the population of the Western Region. As half of the national population lives in 'rural' areas, their needs should be recognised and addressed across all government policy, and all aspects of the NPF, and not just considered under a specific rural piece. This chapter has very little practical focus on the needs of a significant proportion of the population.

There is also a definitional issue with 'rural' as, notwithstanding the statement that towns of under 10,000 (outside the metro catchment areas) are treated as 'rural', practically all discussion in Chp 4 seems to be based on an interpretation of 'rural areas' as open countryside or small villages. If medium and small-sized towns are to be considered 'rural' in the NPF, then the assessment of rural issues in Chp 4 needs to be consistent and fully incorporate these towns.

It would be preferable if the NPF included a detailed section on Towns – large, medium and small – on their roles, specific issues and strategy for development.

The interlinkages between urban and rural places are many and varied and fundamental to how both operate. The nature and extent of urban-rural linkages should be at the core of the NPF's strategy for development of both types of area.

4.1 Strengthening Ireland's Rural Fabric p. 62

p. 62, *The agri-food and tourism sectors, which are particularly important for rural economies, employ in excess of 363,000 people (18% of the national workforce).* This is not an appropriate statistic to characterise rural employment as it counts total national employment (urban and rural) in just two sectors. Urban areas account for a very significant share of tourism employment. A statistic on actual employment of rural residents would be more appropriate.

4.2 Enhancing our Unique Rural Settings and the Communities who live there p. 63

p. 63, *There are clearly differences between types of rural areas and rural communities, including scale, accessibility, the influence of neighbouring urban centres, natural resource assets and access to infrastructure.* While recognising the differences in types of rural areas, very little analysis is provided of different rural area types and their specific issues. A 'one size fits all' approach seems to be taken to 'rural' which, based on the definition used in the NPF, is home to half the national population. The only distinctive 'type' of rural area discussed in detail is offshore islands.

4.3 Planning for the Future Growth and Development of our Rural Fabric p. 65

This section is where the draft *Ireland 2040-Our Plan* definitional problem with 'rural' is very clear. Many references to 'rural areas' and 'rural communities' are clearly only referring to villages and open countryside e.g. stating that rural areas should not cater for urban or suburban style development when clearly this is appropriate for small and medium-sized towns which are included in the definition of 'rural areas' here.

The pattern of dispersed development is assumed to be bad, but it is not clear what is meant by dispersed population, is it single houses in the countryside or a scatter of smaller towns and villages?

The target of 15% growth for towns of < 10,000 and rural areas is for the percentage population growth of these areas. Other targets in the draft *Ireland 2040-Our Plan* state the proportion of total national growth that is to occur in a particular type of area e.g. 50% of national growth is to occur in

the five cities. No target is set here for the share of national growth that is to occur in small and medium-size towns and rural areas, although they are currently home to half the national population.

National Policy Objective 14

This states that the allocation of the average growth of 15% is to be allocated regionally and locally through the RSES and CDPs. As noted elsewhere this places a considerable responsibility on the RSES to allocate the national target regionally and locally.

p. 65, ... *it is intended to arrest both the decline of less accessible rural areas and the rapid growth of more accessible ones.* It is not clear how this is possible or can be achieved by the NPF.

4.4 Rural Towns p. 66

Overall this section requires greater consideration of issues of enterprise development, retail, public and private sector service provision and the roles and functions of rural towns.

National Policy Objective 15

This is very welcome however it is not specified what the 'targeted measures' are. National Policy Objective 17b is positive and specific and could be very useful if implemented.

4.5 Open Countryside p. 68

It is very useful to recognise the need for a more flexible approach to planning in remoter rural areas where housing and residence is an important part of maintaining viable communities. National Policy Objective 18a refers to the 'five city regions' and the hinterland of large towns, but these are not mapped in the draft *Ireland 2040-Our Plan* so it is not possible to define which rural areas fall within or outside these areas of 'urban influence'.

4.6 Planning and Investment to Support Job Creation p. 69

This section adopts a narrow concept of employment in rural areas, given the broad definition used here. No mention is made of two of the largest employment sectors retail and health/care. This section needs to take a more evidence-based approach, based on data about the sectors that people who live in rural areas currently work in, and are likely to work in up to 2040. It is also notable that no reference is made to the Regional Action Plan for Jobs.

Pages 70-71 include a very limited selection of sectors, exclusively natural resource based activities which, while important to rural areas, are relevant to only a small proportion of the total 'rural population'. A broader range of sectors, reflecting the breadth and complexity of the rural economy, should be incorporated here.

Energy Production

In meeting the challenge of transitioning to a low carbon economy, the location of future national renewable energy generation will, for the most part, need to be accommodated on large tracts of land that are located in a rural setting, while also continuing to protect the integrity of the environment. This is very important as energy production can be an important part of the rural economy but there needs to be clarity on how it can be achieved.

4.7 Addressing Connectivity p. 72

It should be acknowledged that the fact that rural Ireland has not benefitted from the same levels of accessibility as cities and larger towns is the result of policy choices made rather than just their rural nature.

It is suggested that greenways and blueways are complementary to 'harder' infrastructure projects but there is no detail provided on any 'harder' infrastructure projects except the National Broadband Plan. No mention is made of transport accessibility, connection to primary and secondary roads, air access, rail, freight/logistics or energy. As it is acknowledged that accessibility is a key constraint for rural areas, it needs to be explicitly included here.

4.8 Investment Coordination p. 73

Rural policy is multi-faceted but it affects a very significant proportion of the population (half based on the definition used here) and it may be that expecting their needs to be addressed by a 'rural' policy, rather than by general policy which takes account of all of the target population, risks marginalising rural people and their needs. It might also be easier to achieve coordination with other policies if this was the case.

5. People, Homes and Communities

5.2 Shaping Sustainable Communities p.76

This section is quite disjointed and its key message unclear. National Policy Objective 25 does not appear to be related to the text.

p. 77, Hierarchy of Settlements and Related Infrastructure diagram. It is not clear if this hierarchy diagram is intended to illustrate the current situation or to show what, in theory, should be located in settlements.

Either way many of the items do not appear at the appropriate level. For example power generation is unlikely to be in a city, the diagram implies that swimming pools should only be available in towns of more than 10,000 and museums, galleries and maternity services only in cities. The only higher education included is University, located in cities, whereas Institutes of Technology are not included.

The hierarchy as outlined here would indicate that, in the absence of a city, the north west and the midlands would (should?) not have access to a very wide range of services.

5.3 Healthy Communities p.78

p. 78, *High quality acute care will always be an important component of integrated healthcare so that emergency and more complex cases are treated safely in the appropriate acute hospital setting supported by the relevant specialist clinical expertise.* The diagram on the previous page seemed to indicate that acute hospitals are/should only be located in cities. This would imply that the north west and midlands would not have acute hospital services.

This section should include more reference to the specificities of planning to support healthier communities in rural areas and villages e.g. footpaths and safer walking areas either off road or on a safer road margin than is often the case at present.

5.4 Age Friendly Communities p. 80

p. 80, ... *more seamless and appropriate continuum of housing choices ...* How these choices are to be provided, the relationships between private, public and community and voluntary provision and the rural/urban context are critical questions which should be referred to.

This section only refers to urban amenities, it does not include reference to older people living in rural areas and open countryside and the provision of services to facilitate them to continue living at home in a rural setting such as rural transport, home care and GP care in rural areas.

5.5 Diverse and Inclusive Ireland p. 82

Discussion of ethnicity, religion or language (other than Irish) is absent. Planning has a key role to play in integration and its role in reducing the risk of 'ghettoisation' and encouraging multicultural integration is important. It is important to appreciate that ethnic diversity is not an exclusively city phenomenon and many small and medium sized towns have substantial ethnic minorities (e.g. 23% of the population of Ballyhaunis in Co Mayo are Muslim).

Those living in poverty, including those experiencing homelessness, are another section of society whose needs should be reflected here.

5.6 Education and Life Long Learning p. 84

Discussion of further and higher education should refer to the objective of improving physical access for young people and job seekers based in rural areas. Rural transport often does not facilitate access to further or higher education.

National Policy Objective 32

The expansion and consolidation of third level facilities at locations where this will contribute to regional development. This is very welcome and it would be good if this was a stronger policy target of the NPF with specific policies to implement.

The question of how the 'locations where this will contribute to regional development' will be decided is important. Does the reference to 'regional development' refer to achieving the targets set down in the draft *Ireland 2040-Our Plan*? On page 140 where the National Strategic Outcome for education in the NIP is outlined, the consolidation of the DIT campus at Grangegorman is mentioned as a flagship project but no other third level facilities are mentioned.

The north west requires a greatly strengthened third level offering to facilitate regional development. The Connacht/Ulster Alliance bid for Technological University status, as a key enabler of regional development of the north west, should be highlighted and supported in the context of National Policy Objective 32. Strengthening the role of Athlone IT in driving regional development in the midlands should also be identified.

5.7 Housing p. 85

p. 85, 4th bullet of National Core Principles and National Policy Objective 34 both imply a judgement on a settlement's potential level of future development. Such an approach must not result in impeding future potential development and new opportunities in settlements of smaller scale.

p. 86, *Housing location policies will prioritise locations where people have the best opportunities to access a high standard quality of life.* While there are objective indicators of quality of life, many aspects are highly subjective and what an individual seeks for a high quality of life varies greatly from person to person and over their lifecycle. How will this be defined?

p. 86, ... *people living further away from their jobs ...* While dispersed housing development is a factor in this pattern, it is also the result of increased concentration of job opportunities. New job creation is spatially concentrated, contributing to the pattern of long distance commuting as much as housing location does. Greater dispersal of job opportunities would be as effective in addressing this issue and would also ease demand on infrastructure and services in Dublin.

Building Resilience in Housing: Many small and medium sized towns also have significant proportions of vacant and derelict buildings. Given their smaller size, even a relatively modest number of derelict buildings can bring a strong sense to dereliction. The challenge of vacancy and dereliction rates for small and medium sized towns needs to be addressed here.

p. 87, *The balance between home and work life also places altering demands on our houses as many people choose to work from home.* Recognition of increasing numbers of people working from home is useful. However the NPF does not seem to factor this trend into its targets or strategy. Changing trends in work will have fundamental spatial implications within the lifetime of the NPF and need to be factored into the strategy.

Reconciling Future Housing Requirements Effectively: What agency will be responsible for collecting data and ensuring methodologies are standardised?

6. Realising our- Island and Marine Potential

More than half (55%) of the coastline of the Republic of Ireland is in the Western Region⁵, so the development of our island and maritime potential is regionally and nationally important.

In this chapter there is no discussion of the way that the development of our island and maritime potential will influence the achievement of the targets set out in chapters 2 and 3. Nor is there discussion of how, given that much of the island and marine economy and culture is outside the cities and larger towns, the marine economy could, if very successful, lead to significant development in places which have not been targeted by *Ireland 2040-OurPlan*.

In order to develop the maritime economy, land based infrastructure development is essential. Some of the areas with greatest potential for maritime activity are among the most remote parts of Ireland and have, historically, poor infrastructure.

Improvement in broadband and mobile phone connections is essential to the development of our offshore economy and coastal communities, in the same way as they are for other rural and less developed areas. It would support the development of local enterprises and community connectivity both in high-tech, high value added opportunities in the marine sector as well as in tourism, amenity and recreation and more traditional fishing, marine farming and foraging enterprises.

Another priority in most instances is improved road connection, our coasts are not well served by a quality road network. In some areas, as ocean energy opportunities are developed, significant energy transmission and distribution infrastructure investment will also be required. These areas should be designated in the NPF and subsequent RSEs.

If we are committed to developing our maritime potential it is important that this is integrated with land based investment to ensure the benefits of developments in our island and marine economy are felt in areas adjacent to marine opportunities. This is especially important in relation to **National Policy Objective 41**.

6.3 Ports p. 94

Only Tier 1 and Tier 2 ports are named and the Tier 1 ports are well located to serve the Eastern and Southern regions (Dublin, Cork, Shannon Foynes), while Shannon Foynes is the only port mentioned on the west coast.

The National Ports Policy (2013) was formulated in a pre-draft *Ireland 2040-Our Plan* context and after the NSS was disbanded (2013). The context therefore was one of a 'business as usual' scenario rather than the draft *Ireland 2040-Our Plan* context of planning *for an increasing population in a balanced and coherent way* (p.5), with specific regional targets. The National Ports Policy designation means there are no Tier 1 or Tier 2 ports located along the entire coastline of the west/north west. The goal to realise our island and maritime potential, makes recognition of the importance of our Atlantic ports essential.

There are significant ports in the Western Region, particularly Galway Port and Killybegs and these should be named.

⁵ The area under the WDC remit comprising Donegal, Leitrim, Sligo, Roscommon, Mayo, Galway and Clare.

p. 94. *A greater concentration of traffic through Tier 1 ports; Dublin, Cork and Shannon Foynes.*

There is strong growth in traffic through all Irish ports but there is an increasing imbalance with volumes through Dublin port being disproportionately large while local ports do not put through the volume that good spatial strategy would dictate, according to the Irish Exporters Association⁶. In the interests of competition and security it is concerning if there is to be further concentration of traffic at Dublin port. Not only should ports such as Cork develop to take more of its 'fair' share but also ports such as Drogheda and Galway, which have been defined as being Regional Ports and given over to the local councils to run, should be supported.

While many exporters would like to use ports in the South and West, the poor interregional connectivity is a militating factor. The further concentration of traffic should be at Cork, Shannon Foynes and the other ports serving the west/north west region.

The discussion of other ports of regional significance (p. 95) should name Galway Port which has an ambitious masterplan which aims to significantly grow and capture tourism and cruise line market. This is a key enabler of Galway and its region.

Killybegs port should also be named. It is a natural deepwater port and the second largest fishing port in the country. It also handles passenger cruise liners and mixed specialist cargoes. In recent years Killybegs has become the favoured port for the importation of wind turbines, and is a service port for the offshore gas/oil drilling rigs, a sector which is likely to become increasingly significant with the development of the renewable energy sector.

6.5 Offshore Renewable Energy p. 96

The importance of renewable energy and off shore energy is highlighted throughout draft *Ireland 2040-Our Plan* which notes that its development is *critically dependent on the development of enabling infrastructure including grid facilities to bring the energy ashore and connect to major sources of energy demand*. It further notes that:

Given potential for renewable generation in the western part of the island, this may necessitate reinforcing the existing transmission network in the west to facilitate the transfer of renewable energy generated to the major demand centres in the east.

The WDC agrees with these points but the recent decision by EirGrid not to proceed with the Grid West Project is counter to this and the decision means that these developments are unlikely to be possible in the next two decades unless there is an immediate decision to proceed with similar infrastructure.

In order for the NPF to be implemented successfully there needs to be a strong mechanism to ensure that state owned enterprises (SOEs) operate and make decisions in line with strategic government policy such as the NPF, as well as other policies on climate change, energy or environment.

Ensuring that this occurs is essential to achieving **National Policy Objective 44**.

⁶ Pre Budget Submission, Budget 2018, Irish Exporters Association p.9, 10. <http://www.irishexporters.ie/wp-content/uploads/2017/08/PreBudgetSubmission2018.pdf>

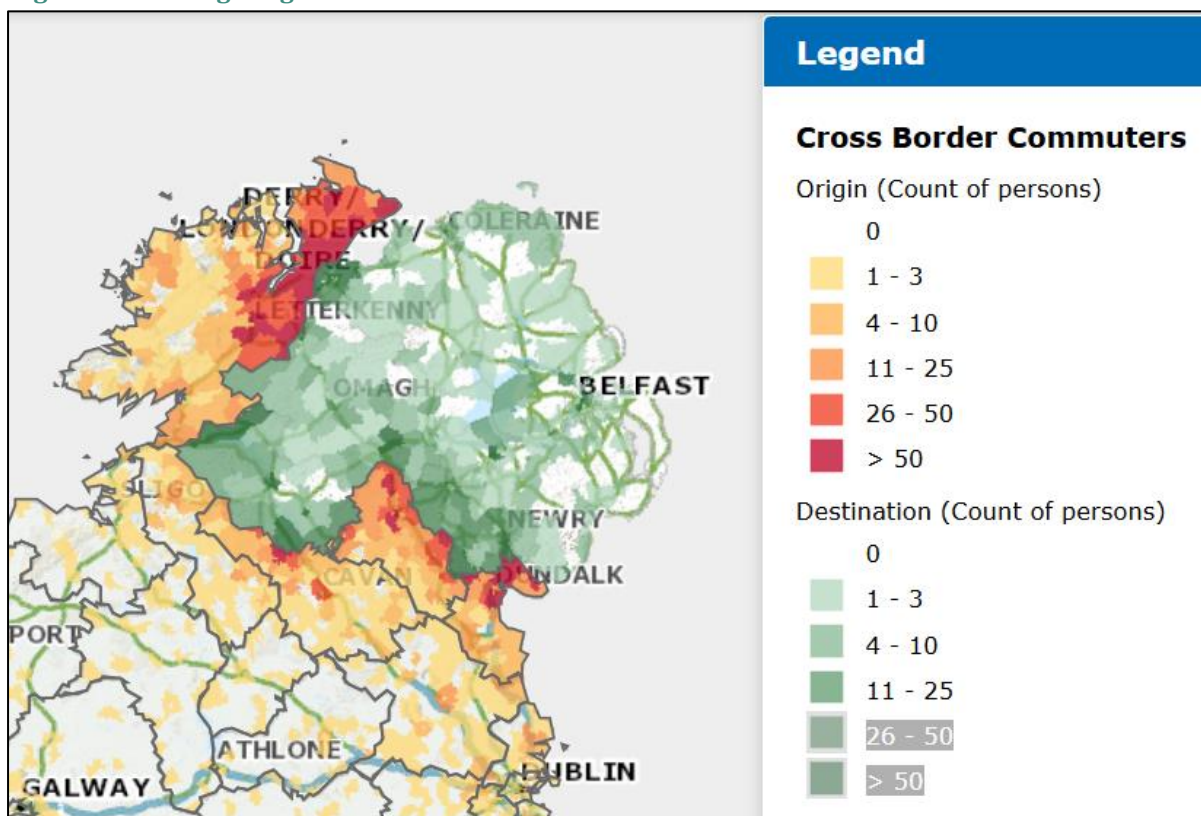
7. Working with Our Neighbours

The WDC has a major concern about the relative priority given to Dublin-Belfast over the north-west. Cross-border commuting between Donegal and Northern Ireland (see Fig. 1) accounts for 60% of all cross-border commuting from the Republic of Ireland to Northern Ireland and is far more significant than elsewhere on the Border, including Dundalk-Newry.

The North West is an integrated cross-border community with a strong history of co-operation, a well established strategic growth partnership and a lower current level of development. It is not clear why the draft *Ireland 2040-Our Plan* places more focus on the development of the Dublin-Belfast corridor than the Derry City-Letterkenny North West City Region which, as an area of weak urban structure, would derive significant benefits from investment. The Derry City-Letterkenny North West City Region needs to be identified as a key priority for investment under the NPF and NIP.

Indeed the development of the North West City Region and the cross-border Local Authority cooperation here is a model of collaboration which might be used elsewhere (and not just cross border).

Fig. 1: Commuting: origin and destinations of cross border workers and students- Census 2016



Source: CSO, 2017, *Census of Population, Profile 6 Commuting in Ireland*

7.1 Ireland and the European Union p. 98

p.99, ... *the potential for increased economic investment into Ireland [resulting from Brexit] ...* To date, the evidence suggests that this inward investment is primarily towards Dublin. The NPF should specify the need for policy initiatives to support this investment relocating to other regions and cities as well as Dublin. It would be important to also indicate here that there will be significant spatial differences in the impacts of Brexit, both positive and negative.

p. 99, ... *ports and airports facilitating faster transit times between Ireland the EU will need to be effectively connected into our land-based transport systems ...* The more important objective here would be to enhance accessibility to the EU via ports and airports already serving the regions. There is a need to expand connections with the EU from ports and airports across Ireland and not to base investment decisions solely on current service levels to the EU.

7.2 Ireland and Northern Ireland p. 100

The three key areas for practical co-operation do not appear to include community or social issues.

7.3 Working Together for Economic Advantage p. 102

Dublin-Belfast is not really an agglomeration, as presented here, and developing it as such is counter to the other aims of the draft *Ireland 2040-Our Plan* as it would promote urban sprawl and long distance commuting. It is also counter to the stated aim of prioritising the development and growth of the 2nd tier cities.

p. 102, *The corridor [Dublin-Belfast] is also the national entry point to the island through its airports and ports.* Use of the phrase 'the national entry point' undermines the role of national entry points located outside of this area such as Cork, Shannon, Ireland West Airport Knock and City of Derry airports and ports.

p. 103, *Figure 7.2 Develop the critical mass of the Newry-Dundalk area to compete with other larger cities.* No justification has been provided for this and Dundalk is the only town (other than the five cities) which has been singled out for development in the entire draft *Ireland 2040-Our Plan* document. It is not clear why this decision was made as other towns in the country would be better placed for development and result in more widespread benefits for a larger area.

7.4 Co-ordination of Investment in Infrastructure p. 104

It is important that there will be focus on infrastructure connectivity and that significant investments are made in the north-west region where the quality and level of infrastructure connectivity is weaker than in other parts of the country.

Transport

p. 104, ... *increased transport connectivity, including bus and rail services, between the main cities, to the north-west region and along the border region ...* and National Policy Objective 48 focus on public transport. While public transport should be prioritised, investment in enhanced road access, and particularly on the A5 Dublin-Derry/Letterkenny route, is a priority as Donegal lacks rail access. It is not clear if this reference to enhanced rail services to the north-west region refers to improved services on Dublin-Sligo line?

Energy

There is mention of electricity interconnection with France, but unless the transmission infrastructure is developed significantly there will not be the capacity to provide renewable energy for export. There needs to be better co-ordination of energy infrastructure investments with government policy so that electricity infrastructure investments are made in line with government policy such as the national mitigation plan, and the energy white paper.

The importance of the natural gas transmission grid as a key energy infrastructure with regional development benefits and the development constraint of the lack of access to natural gas in the north-west should be added.

Tourism

Linking the Lakelands Border region with Ireland's Ancient East ignores the Midlands Lakelands region 'Ireland's Lakelands' – an area that includes east Galway, Leitrim, Roscommon, north Tipperary and north Cork. As a new initiative has just been launched by Fáilte Ireland to brand this area, this should be incorporated here.

8. Realising Our Sustainable Future

8.1 Environmental and Sustainability Goals p. 108

This chapter focuses on the positive but does not give a very clear indication of how, aside from concentration in urban areas and use of brownfield sites, *Ireland 2040-Our Plan* will give rise to a more sustainable pattern of development.

Ireland 2040-Our Plan suggests that *we have many lakes and rivers with good water quality*. This ignores the fact that water quality in our lakes and rivers has, for a variety of reasons, declined very significantly, and that this and other areas of environmental degradation need to be addressed.

8.2 Resource Efficiency and Transition to a Low Carbon Economy p. 110

Integration of climate considerations into statutory plans and guidelines such as *Ireland 2040-Our Plan* is essential. The NPF needs to be more explicit on how these issues will be addressed in the future. A very significant reduction in GHG emissions is required by 2050. This will require detailed planning and decisions on technologies and integration.

There is little recognition of the potential importance of electric vehicles (EVs) in contributing to a more renewable transport system, especially in rural areas, even though a significant rise in their use in rural areas has the potential to reduce carbon emissions and improve efficiency. The focus should not just be on public transport.

In order to ensure that EVs are sustainable they need to use renewable electricity. The development of the grid to support the expansion in electricity demand is important and the process of grid development needs to be more aligned with government policy.

While it is noted in relation to renewable energy that *Some parts of Ireland are more suitable than others for facilitating particular national sectoral aims by reason of physical factors, environmental sensitivities, land capacity and existing settlement patterns*. There is no indication of where these places are, how they might benefit from such developments or where might be excluded; all of which are important strategic decisions with long term implications. Policy needs to be more specific on areas where there should be development of renewable energy technologies.

When considering priorities for development or areas in which sustainable development opportunities are available, it is important to consider how the location of housing and employment along public transport corridors, such as intercity rail routes, allows significant possibilities. It is important to consider the rail network as an asset with huge potential to enable more sustainable development in many regions.

National Policy Objective 57

This is very important, although there is no clarity on how it should be achieved. As noted earlier the recent decision by EirGrid not to proceed with the Grid West project is counter to this policy objective and the decision means that the promotion of renewable energy generation at appropriate locations is already a limited option. Renewable energy developments are likely to be restricted in the next two decades unless there is a significant investment in grid infrastructure *for the long term* rather than just planning based on current demand. The NPF needs to make certain that there is a mechanism ensuring state owned enterprises (SOEs) such as EirGrid, ESB Networks and Gas

Networks Ireland operate and make decisions in line with strategic government policy such as the NPF.

8.3 Protecting Conserving and Enhancing our Natural Capital p. 114

While the objectives outlined in relation to development and flood risk are very welcome it is not clear how the NPF can ensure that these will be implemented.

Although urban development, and in particular city development, is the focus of *Ireland 2040-Our Plan*, one of the downsides of urbanisation is that it increases the rate and volume of runoff from rainfall events and dealing with this requires significant levels of investment.

Government support for green infrastructure is important but some of the key points need to be explained in more detail. How can we assist in accommodating growth and expansion while retaining the intrinsic value of natural places and assets? How do we provide increased certainty in planning by proactively working with and around relevant environmental issues? The objectives are laudable but there has to be a clear means of implementing them.

8.4 Creating a Cleaner Environment for a Healthy Society p. 120

We agree that wastewater treatment is a fundamental service and that upgrades and compliance of urban wastewater treatment plants are essential and need to be priority infrastructural investments

It should be noted that as well as considering public transport, walking and cycling as means of reducing pollution, we need to be planning for major switch to EVs by 2040. The NPF is not really taking the potential of EVs and the likely change in our private vehicle fleet by 2040 into account.

9. Investing in Ireland 2040 - Implementation

In this section of the WDC submission our comments on the themes which are outlined at the start of the chapter are combined with comments on the more detailed National Strategic Outcomes of the National Investment Plan which appear at the end of the chapter.

Enhanced Regional Accessibility

Ireland 2040-Our Plan suggests that investment in connectivity first without urban consolidation measures will likely worsen the current trends towards sprawl and that only when the core areas in key cities and urban areas have been mobilised will there be an enhanced accessibility between key urban centres become a priority. The logic for this sequential investment is not justified and undermines the vision of *Ireland 2040-Our Plan*.

It also suggests a lack of understanding as to the role of infrastructure generally, and transport connectivity in particular, in enabling development and the consequences of the underinvestment which has so negatively impacted the development of the north west.

Furthermore, this sequential approach contradicts the planned shift from projected trends in population (business as usual). It gives very low priority to regional accessibility in contrast to development of core areas of the cities.

There is a suggestion that *only when Smart Growth objectives have been achieved*, will there be further development of connectivity between centres of population of scale to support the objectives of *Ireland 2040-Our Plan*. Enhanced regional accessibility must not be conditional on the achievement of changes in the five cities.

While connectivity between cities is very important the focus on links between Cork and Limerick is another example of sequential investment while the north west, which has no designated city, needs improved accessibility as a priority.

Improving average journey times targeting an average interurban speed of 90kph is a very important target which we assume refers to all urban areas. This would give rise to significant regional benefits.

Accessibility to the North-West

As much of north Galway, Mayo, Leitrim and Roscommon is still relatively inaccessible this should be one of the main priorities of *Ireland 2040-Our Plan*. More specifics are needed on what is meant by 'Upgraded access' to Letterkenny/Derry (N2/N14/A5). Similarly the northern sections of the N4 should be specified, and consideration should be given to upgrading the route to a motorway. The N5 should be included here as it provides access to Mayo/Roscommon.

The development of rail services need to be seen as part of the accessibility solution. Current high patronage levels on routes to the west and north west shows this can be effective.

High-Quality International Connectivity

There is an over focus on Dublin in relation to international connectivity for both airports and ports. There is a very strong case for supporting the growth of the other airports which serve their regions and will promote achievement of the regional targets.

Discussion of ports and airports investment largely leaves out the Northern and Western region, despite the stated need to address challenges and opportunities arising from Brexit, the need to deliver on the regional targets and the need to develop the marine economy.

While it is suggested that investment will be in line with sectoral priorities already identified through National Ports Policy and National Aviation Policy it should be noted that both the National Ports Policy (2013) and the National Aviation Policy (2015) were formulated before *Ireland 2040-Our Plan* but after the NSS was abandoned in 2013. The context therefore was one of business as usual rather than planning for 'an increasing population in a balanced and coherent way' (p.5)

Ports: The National Ports policy designation means the Tier 1 ports are well located to serve the Eastern and Southern regions (Dublin, Cork, Shannon Foynes), while the ports serving the entire coastline of the west and north west are not named. Galway Port has an ambitious masterplan which aims to significantly grow and capture tourism and cruise line market. Killybegs port is a natural deepwater port and the second largest fishing port in the country. In recent years Killybegs has become the favoured port for the importation of wind turbines, and is a service port for the offshore gas/oil drilling rigs. **(see comments on Ports section also)**

Airports: The emphasis is on Dublin for international air connectivity even though *Ireland 2040-Our Plan* notes that the main airports of Dublin, Cork, Shannon and Knock are spatially located to serve most of the population. The focus of investment and ever greater expansion is at Dublin Airport despite the spare capacity at the other three main airports and the ability of these airports to serve their catchments and help drive further development in their regions. The current focus on Dublin Airport only serves the 'business as usual' scenario and militates against each of the other airports fulfilling the role envisaged of them.

Sustainable Mobility

There is excessive focus on Dublin in this section, and it is one of the only parts of *Ireland 2040-Our Plan* which names the major infrastructure investments required. In contrast the cities and labour catchments of Galway, Limerick and Waterford not mentioned nor are centres outside. The analysis does not recognise the very significant role of private transport providers (e.g. private bus companies) in this area and there is no mention of rural transport scheme or any issues of sustainable mobility in rural areas.

A Strong Digital Economy

The challenges in developing a strong digital economy arise not from the dispersed nature of our population, but from the deployment of digital infrastructure on a commercial basis. No other basic infrastructure is deployed on a commercial basis.

Though the NBP has yet to be delivered, when considering a National Planning Framework to 2040, it is important to acknowledge the fast pace of change in technology and the digital economy and the ever increasing minimum standards of broadband bandwidth requirements. Therefore it will be important that the National Broadband Plan is deployed using the most future proofed infrastructure possible.

Empowered Rural Communities

Of the four paragraphs on 'empowered rural communities' two of them are about the Greenway/Blueway Network. While this is an important initiative it seems to be given

disproportionate focus given the breath and seriousness of the capital investment requirements of rural communities.

New digital opportunities are emerging which offer the potential to ensure our countryside remains a living and working community and the WDC strongly agrees that improved connectivity, broadband and rural economic development opportunities should be recognised as the most important element of rural development and rural policy.

Transition to Sustainable Energy

The aim to transition to sustainable energy is welcome but unless there is a clear way to ensure that the plans of state owned enterprises align with government policy this will not happen. Decisions made recently already undermine this transition. The gas network is only discussed in context of interconnection with UK. And there is no discussion of expansion of the gas network within Ireland although expansion of the natural gas transmission network to the north west should be included in NIP.

Sustainable Management of Water and other Environmental Resources p. 139

Development of a new rural settlement investment approach coordinating Irish Water, local authority, developer and community led solutions to ensuring that sustainable water services solutions are progressively implemented could significantly change the way rural areas develop and needs to be part of a wider, coordinated mechanism for rural economic development.

Most of this is again focused on Dublin. Instead there should be an explicit commitment to improving waste water treatment infrastructure throughout the country. In 2016 waste water treatment at 50 out of 185 (27%) large urban areas did not meet EU standards. Raw sewage is being released from 44 urban areas and improvements are needed in 148 urban areas. These should be addressed as a priority.

Strong All-island partnership

National investment planning, the sectoral investment and policy frameworks of departments, agencies and the local government process will be guided by these strategic outcomes in relation to the practical implementation of Ireland 2040 p. 125

This statement appears to be under the incorrect heading. It is a hugely important statement and in many ways the core requirement on which the success of the NPF depends. But there needs to be far more clarity on the process by which this will happen.

Education

The commitment to the expansion and consolidation of third level facilities at locations which strengthen the capacity of those institutions to deliver the talent necessary to drive economic and social development in the regions is very welcome. However it needs to include all such locations and not just Grangegorman.

9.2 Governance p. 125

The functions and scope of the Office of the Planning Regulator are likely to be limited to the land use planning aspects of *Ireland 2040-Our Plan* and it is not clear if it will have the scope or competence to monitor and review the wider economic, social, demographic and environmental elements of *Ireland 2040-Our Plan*. New indicators are key but need to be aligned with those for the

RSES. A timeline for developing these should be specified. Similarly the process of regional monitoring needs to be developed with the perspective of achieving the goal of regional development.

Metropolitan Areas: Building Centres of Scale p. 126

The area to be covered by the MASPs for each of the five cities needs to be defined and the relationship between the MASPs and the RSES is unclear. Will MASPs be developed after the RSES to implement the RSES in the metro areas, or will they be developed independently?

Ireland 2040-Our Plan notes that “consideration will be given to establishing an appropriate level of political and administrative leadership for the preparation and oversight of metropolitan area strategic plans with the active participation of relevant regional and local authorities and other stakeholders.” This is a far stronger statement on the political and administrative leadership required to implement a strategy than is provided for the RSESs. The relative resources of the Local Authorities in the cities, compared to the Regional Assemblies, could mean that the MASPs will be far better resourced than the RSESs.

Integrated Spatial Planning and Transport Planning p. 128

Much of the discussion on integrating spatial and transport planning refers to the GDA only but this integration should occur everywhere and not just in the cities as envisaged in NPO 66.

Prioritising Development Lands p. 129

National Policy Objective 68

p. 129 the National Policy Objective 68 is strong and specific. This reflects the duality of the NPF with the land use planning aspects specified in a more precise and concrete manner than many other NPOs.

9.3 Ireland 2040 and the National Investment Plan p. 130

Where conventional evaluation and appraisal, like cost benefits analysis (CBA) methods are used to determine investment priorities this ultimately support ‘business as usual’ outcomes. However there is welcome recognition that there are significant risks from not securing an effective approach to regional balance in Ireland’s future economic development. Therefore a change to the conventional appraisal and evaluation methodologies used is needed in order to determine what projects are priority.

The National Investment Plan 2018-2027 p. 131

The ten year NIP is to enable a limited number of large towns that emerge from the Regional Spatial and Economic Strategy (RSES) process as potential regional growth drivers for their surrounding catchments. If the NIP is to be published alongside *Ireland 2040-Our Plan*, but the RSESs are not published for another year, the NIP possibly include investments needed to implement the RSES. A mechanism is needed to ensure that there is a clear commitment to fund the infrastructure necessary to RSES implementation.

It is essential that effective regional development is an important criterion in project selection. Current appraisal methodologies tend to support a ‘business as usual’ approach.

The WDC welcomes the commitment to more explicitly align the investment plans of state owned enterprises with government objectives as this recognises the extent to which state agencies are instruments of wider Government policy.

Ireland 2040: National Strategic Outcomes for the National Investment Plan

Compact Smart Growth p.132

It is not clear who will administer the Smart Growth Initiatives nor how much funding will be available.

There seems to be a presumption that developments in rural areas must have an intrinsic requirement to be located in a rural setting and have wider benefits for the local rural and regional economy. The same requirement does not apply to urban developments.

10. Assessing Environmental Impact

In this chapter there is discussion of other national strategies and their alignment with the NPF. There is however, little discussion of sectoral policy and the importance of ensuring that this is clearly aligned with the NPF.

In figure 10.1 the MASPs and the RSES are equated but, as discussed earlier, their relationship is not clear, and it is not known whether the MASPs will in effect be responsible for cities while RSESs plan for other areas.

There is some mention of the alternatives to the 'business as usual' approach, and while they are discussed briefly elsewhere in the document there is relatively little information about the other options and how the decision was made to select Option 2 "Regional Effectiveness and Settlement Diversity". The draft *Ireland 2040-Our Plan* suggests (p147) that Option 2 *will contribute to preserving sense of place and improving regional connectivity and services outside the cities*. This has not been discussed in any detail in the rest of the draft *Ireland 2040-Our Plan* and no information is provided on how it will be done.

The preferred approach (Option 2) is characterised by "**Regional concentration towards cities and potential for some regionally important larger settlements**". This concept of regional development as being city development is particularly problematic for regions without a city designated for development, in particular large parts of the north and west of the country.

As there is no city north of Galway and with no designation of an urban centre to be developed, it seems that the north west, despite general references to urban settlements there, will not be prioritised and not considered as meriting focus in *Ireland 2040- Our Plan*.

It thus appears that this region is not being prioritised for development and that there is no vision for regional development beyond the four cities outside Dublin. This means a large part of the country and population will once again be at the bottom of the list for investment and development.

Sequential provision of infrastructure with some strategic investment outcomes identified.

It is of concern if provision of infrastructure is only to be provided sequentially. Decisions about which infrastructure is prioritised are very important and the priorities chosen will inevitably impact on how and if the NPF is implemented fully.

Conclusion

The Western Development Commission (WDC) is pleased to have the opportunity to make a submission on the *Ireland 2040-Our Plan* draft National Planning Framework

The WDC is a statutory body established by government to promote, foster and encourage economic and social development in the Western Region which comprises the counties of Donegal, Sligo, Leitrim, Mayo, Roscommon, Galway and Clare.

It operates under the aegis of the Department of Rural and Community Development.

For more information about the WDC please see www.wdc.ie.

If you would like to discuss or clarify any issues in this submission please contact policyanalysis@wdc.ie