

National Planning Framework,  
Department of Housing, Planning,  
Community and Local Government  
Custom House  
Dublin 1

Sent by email to:  
[npf@housing.gov.ie](mailto:npf@housing.gov.ie)

**Re Submission on Ireland 2040 Our Plan Draft National Planning Framework**  
**Refer to previous submission 0572**

A Chara,

Further to my previous submission [reference 0572 Conor Skehan] I wish to make the following submission;-

The attached tables provide a condensed analysis of the NPF, as currently written, referenced to a systematic set of evaluation criteria that were supplied in the referenced Round One Submission].

The recommendations of this submission will be found to accord with the views expressed in the majority of the substantial submissions made in the Round One Consultation process. These are referenced, where relevant, throughout this submission.

These conclusively demonstrate that the current document requires significant restructuring and rewriting to:-

- Address the Recommendations of the NSS Expert Group
- Provide specific, strategic, spatial and prioritised goals, indicators and targets for places, sectors and actors to achieve optimum outcomes.
- Ensure resilience under a wide range of likely future scenarios that will be principally driven by external forces.

I wish to draw your attention to the fact that the NPF requires Strategic Environmental Assessment, Appropriate Assessment and Flood Risk Assessment and that the documents that accompany the Draft National Planning Framework do not conform with the relevant legal requirements.

I trust that you will find this submission useful and I am happy to make myself available to assist further in your work of furthering the preparation of this document.

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Conor Skehan

10/11/2017

# **Submission regarding Ireland 2040 Our Plan Draft National Planning Framework**

**Conor Skehan**

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## Introduction

This submission offers a critique of the Document Ireland 2040 Our Plan Draft National Planning Framework [NPF hereafter]

It is based upon the previous submission [ref 0572] which set out to identify criteria and issues for how the NPF should be developed. This submission examines whether and how these have been addressed by the NPF.

In making these evaluations this submission also draws upon the views expressed in the substantial submissions made in the Round One Consultation process. These are referenced, where relevant, throughout this submission.

### Structure of Submission

To ensure clarity, this submission begins with a series of recommendations – there are followed by the discussion and analysis of Improvements Required and Critical Evaluation that provides the basis for making these recommendations.

#### 1. Recommendations

- Re-orientation Required
- Re-writing Required
- Need for Authoritative Ownership of NPF

#### 2. Improvements Required

- Critical Considerations
- Critical Omissions
- Weak Priorities

#### 3. Critical Evaluation

- Evaluation Criteria as supplied in Round One Submission
- Evaluation of Conformance with Recommendations of the NSS Expert Review Group
- Evidence-based Planning?
- Criteria for Success?
- Fundamental considerations
- National Purpose?
- Inclusion of Integrating Strategies
- Addressing Key Trends?

## Recommendations

### Restructuring Required

The document needs to be re-structured as follows

It needs to be significantly shortened –to a maximum of 30 pages - concentrating only on issues that are purposeful, national, spatial and strategic – as recommended by the Expert Review Group and as noted by many submissions.

The NPF needs to be re-framed to follow well established norms for the preparation of strategic planning frameworks – particularly in the matter of including a systematic, evidence based description and analysis of internal and external drivers.

- In this matter it is a matter of particular concern that, for a small open economy that is almost entirely dependent upon external trade and investment, the NPF is so insular and inward looking.
- Strategic Planning for externally governed entities require significant capacity for openness and flexibility as well as evaluation and review – which are lacking as substantial elements in the current version.

The NPF needs to demonstrably refer to and incorporate the submissions received – consistent with the precedent of a requirement for the preparation of a ‘Managers Report’ in the Development Plan preparation process.

## Re-orientation Required

On the basis of the evidence produced in the attached analysis – which is confirmed by a majority of the submissions made to Round One - the NPF requires six significant re-orientations

1. to omit objectives aimed at reducing, restricting or otherwise limiting the continued growth of the east Leinster Region
2. to remove or reduce the excessive emphasis on binding population targets – in favour of accommodating existing and emerging economic, demographic and social patterns
3. to include specific, spatial and realistic objectives for rural areas and small town that will provide economic betterment based on relevant, specific strengths of each area
4. to ensure the flexibility and responsiveness required to successfully adapt to rapid and significant changes in external drivers
5. to reduce the emphasis on land-use planning [especially population targets] and to increase the emphasis on the spatial and strategic coordination of issues at a national level
6. to omit the excessively specific and prescriptive elements such as Table 3.1 well as Appendices 1 and 2

## Re-writing Required

On the basis of the evidence produced in the attached analysis – which is confirmed by a majority of the submissions made to Round One - the NPF needs to be significantly re-structured and re-written to achieve the following eight recommendations; -

1. to include mapping to indicate the location of the priority areas for the major future uses – following the example of the Failte Ireland Submission 0621 [map at section 1.8].
2. to provide a strategy focussed on the economic betterment required to deliver the laudable, but qualitative that are currently set out section 1.
3. to provide a strategy that is based on visions and values that accurately reflect the range and location of national locations and needs – as described in the 600+ submissions received.
4. to provide a strategy to protect and enhance national competitive advantages – as set out in the submissions Chambers Ireland and Dublin Chamber
5. to achieve the continuation of the further growth of Dublin - ensuring its position is not hindered as an international competitive economic region – as set out in the submission of the IPI and the RTPI
6. to include meaningful vision and goals a wide range critical issues that are currently either omitted or which lack sufficient specific spatial focus and direction.
  - These omissions include the majority of major rural land-uses – including rural settlement, agriculture, tourism, forestry, mineral extraction – as set out in the submissions by the IFA, Bord na Mona, Coillte, Failte Ireland, the
  - The omissions also include specific spatial focus or strategic direction for critical infrastructure including aviation, road and rail transport, electrical transmission, water services and communication technology – as set out in the submissions by EirGrid, irish water, TII, Iranroid Eireann and Dublin Airport
7. to include resilience for strategic proposals under a range of reasonably foreseeable scenarios
8. to assess the likely environmental effects of future uses – as presently written, they do not conform with statutory requirements.

## Need for Authoritative Ownership of NPF

At a fundamental level, the evident failure of the document to provide anything other than aspirational co-ordination of a range of national, regional and local authority policies and activities, planning and investment, both public and private point to the need for a National Planning Framework to be prepared and implemented by a more central senior Department – such as Finance or Taoiseach – which is more in line with international practice. This will be a critical factor in achieving successful and continuous implementation.

This advice is confirmed by the submissions of the Construction Industry Federation – as well as RTPi Ireland [a national professional planning association] which states “It is essential that the NPF is led corporately within Government with the Taoiseach having an important role in using it to coordinate action and as a tool to assess progress made.” And the IPI [a national professional planning association] which states “Plans for the delivery of the NPF must be coordinated across all relevant government departments”



## Critical Considerations

An analysis of the NPF has revealed that there are significant issues to be resolved. These are

**Structural Issues** – the inclusion of generalisation, aspirations at one level as well as excessively specific and prescriptive material – such as population targets at table 3.1. Throughout the document there is a repeated failure to confine consideration to matters that are national and strategic. Addressing this issue will assist in significantly reducing the very large size of the document – which impedes clarity and focus. Throughout the document there is an excessive emphasis on land-use planning considerations – to the exclusion or omission of strategic national issues such as key sectors and strategic infrastructure.

**Lessons Learned** - The NPF exhibits a systematic failure to address the recommendations of the Expert Review Panel who examined the failure of the NSS. The most significant reasons for the failure of the NSS that were identified by that Group are repeated throughout the NPF – namely

- A failure to be strategic through the continued emphasis on the promoting planning concepts – especially ‘Balanced Regional Development.
- A failure to be spatial, highlighting and seeking to capitalise on the potential of places.
- A failure to be national in scope
- A failure to be strategic and long-term
- A continued proliferation, throughout, of self-evident generalizations
- A continued promotion of objectives and targets which restricts unnecessarily the scope for local initiative and action,

**Ideological Emphasis** – the NPF continues to attempt to address issues that are ideological obsessions of the planning profession but little practical significance in practice. These include, but are not limited to;-

*Self-reliance* – an inappropriate and naive objective for one of the world’s most successful exporting economies

*Rural Housing* – the NPF contains significant attention to dealing with the prevention of future rural housing – but says nothing about meeting the needs of existing rural housing and their occupants– which constitute about one third of all Irish houses

*Circular Economy* – this abstract concept is given more coverage than existing sectors such as tourism or forestry which employ many people and make major economic contributions in rural areas.

## Critical Omissions

The most significant omission of the NPF is the complete lack of the mapping of locations of intrinsic opportunity and constraint as well as mapping of location of key concentrations of population, uses and strategic infrastructure.

Other significant omissions include;

- Key Strategic Planning Elements – mostly external conditions
- Specific Vision and Goals to improve economic output and stability
- Clear Vision of Ireland’s international role and position – especially in terms of external drivers
- Definitions of Success fail to explicitly identify and address core competitive advantages
- Absent or weak Review and Evaluation Provisions
- No clear strategic framework for key actors and activities
- Aviation, Shipping and major road and rail provision – which are highly spatially specific locations with clear implication for other key strategic infrastructure
- Any mention of specific agricultural sectors – such as dairying, tillage that have highly spatial patterns

## Weak Priorities

The NPF exhibits priorities that do not accord with the requirements and objectives of sustaining Ireland’s unique competitive advantages – either as an economy or as a society. This issue principally refers to the failure to clearly prioritise improving economic output and stability. This gets less detail and priority than quality of life, environmental performance and the liveability of our cities, towns and rural areas.

Other areas of weak or inappropriate priorities include;-

- Excessive internal focus – little recognition of role or strength of external drivers
- Poor accommodation of existing issues – such as rural housing, changing agriculture or new movement patterns
- Excessive attention to abstract issues – as set out above
- Excessive attention to urban issues – lacking clear vision for rural issues

## Evaluation Criteria as supplied in Round One Submission

## Evaluation of Conformance with Recommendations of the NSS Expert Review Group

The NPF was evaluated according to the Criteria and Recommendations set out by the Expert Group Review of the NSS. The analysis determined that in almost all instances the NPF does not accord with either of the recommendations of the Expert group.

The Expert Group Review recommended that objective of the NPF should be to shape Ireland's spatial development over the next 20/30 years, while recognising that places have different, distinctive but unequal potential. The Group also advised that the NPF should be purposeful, national, spatial and strategic.

The analysis demonstrates that the NPF is not spatial [it contains no maps and no specific identifications of the locations for development. The NPF specific recommendations are almost entirely confined to prescriptive targets for the locations of population growth – and by extension growth of jobs. There is no equivalent spatial specification of the associated land-use and land take requirements, infrastructure, housing, retail, social infrastructure or enterprise and employment developments required.

Similarly, there is no mapping or other spatially specific identification or analysis of the factors that give rise to why different areas have different, distinctive but unequal potential – and the associated measures required to address and accommodate these differences.

The analysis finds little evidence of spatially specific and differentiated purpose or strategy. Such specific developments as are mentioned are almost exclusively existing projects, plans and policies all within a near-term horizon of 5 – 10 years. The document, with the exception of population projections – is almost entirely silent on likely developments in the medium to long term period of 10 – 30 years. This is the most important time horizon for the identification, location and co-ordination of key strategic infrastructure – which have long time horizons.

TOPIC	EXPERT GROUP FINDINGS	NPF
RECOMMENDED APPROACH	Be purposeful, avoiding self-evident generalizations on the one hand, or direction which restricts unnecessarily the scope for local initiative and action, on the other.	<p>The NPF is based upon and is replete with self evident generalizations – principally about housing and balanced development</p> <p>For instance <i>‘Much of the economic benefits in the agri-food sector are dispersed throughout the country making it particularly vital to rural areas and the sector is playing a significant role in economic development.’</i></p> <p>The NPF is a centrist document, it is devoid of any vision or mechanism for engaging or facilitating local initiatives or actions.</p> <p><b>Conclusion the NPF does not accord with either of the recommendations of the Expert group on this matter.</b></p>
	Be national in scope; it is not a local plan for Ireland drawn up by the Government.	<p>The NPF lacks any strategic national scope</p> <p>The only national objective appears to be a negative ambition - to limit the growth of the eastern region.</p> <p><b>Conclusion the NPF does not accord with the recommendations of the Expert group on this matter.</b></p>
	Be spatial, highlighting and seeking to capitalise on the potential of places.	<p>The NPF has no spatial content. There are no maps in the document. There are no tables or any similar spatial definitions of what the different and specific potential of different places are – or what they might become.</p> <p><b>Conclusion the NPF does not accord with the recommendations of the Expert group on this matter.</b></p>
	Be a strategy, not a vehicle for promoting planning concepts with little, if any practical significance or become a wish list or shopping list of projects.	<p>The NPF is not a strategy.tbc</p> <p>It devotes significant attention to abstract planning concepts, specifically in Appendix 1 and 2 without an accompanying strategic spatial vision</p> <p><b>Conclusion the NPF does not accord with the recommendations of the Expert group on this matter.</b></p>
OBJECTIVES	The objective of the NSS is to shape Ireland’s spatial development; it must recognise that places have different, distinctive but unequal potential; and the necessary sharp focus on priorities will involve hard choices.	<p>The NPF has no spatial component. It contains no specific differentiated strategic approach that examines, articulates and creates a vision and objective for different regions.</p> <p><b>Conclusion the NPF does not accord with the recommendations of the Expert group on this matter</b></p>
	Shape Ireland’s territorial development over the next 20/30 years	<p>The NPF lacks any 20 – 30 specific territorial objectives – other than population limitation targets</p> <p><b>Conclusion the NPF does not accord with the recommendations of the Expert group on this matter</b></p>

TOPIC	EXPERT GROUP FINDINGS	NPF
WHAT TO AVOID	Not be a statement of bland and unobjectionable aims and objectives.	The majority of the NPF consists of a series of self-evident generalisations – with few spatially specific aims or objectives <b>Conclusion the NPF does not accord with the recommendations of the Expert group on this matter</b>
	Not be a statement of land use planning policy, nor is it a compendium of policies	The core of the NPF is a landuse planning policy that seeks to set regional population growth targets <b>Conclusion the NPF does not accord with the recommendations of the Expert group on this matter</b>
	Not be so prescriptive that it cannot react to or accommodate new opportunities or changed circumstances	Table 3.1 and Appendix 1 and 2 set out extremely prescriptive requirements for growth – that are neither enforceable nor realistic. <b>Conclusion the NPF does not accord with the recommendations of the Expert group on this matter</b>
	Not be so generalised or so flexible that it does not provide the direction and stability to guide key investment and policy decisions	The NPF is an excessively generalized document. It fails to give direction and stability to guide key investment and policy decisions. This is applies to the following key issues <ul style="list-style-type: none"> <li>• Brexit</li> <li>• Transport &amp; Aviation</li> <li>• Water Services</li> <li>• Tourism</li> <li>• Agriculture</li> </ul> <b>Conclusion the NPF does not accord with the recommendations of the Expert group on this matter</b>
WHAT TO INCLUDE	Be a short statement, very much on the “less is more” principle, rather than a treatise on spatial development	The NPF is not a short document. At 151 pages in length – without counting appendices – it lacks focus or clarity. Much of the preliminary sections of each chapter consist of further ‘treatise on spatial planning’ – as does Appendix 1, 2 <b>Conclusion the NPF does not accord with the recommendations of the Expert group on this matter.</b>
	Have a focus on spatial development issues and choices which are genuinely national in scope and scale.	The NPF contains no mapping or any reference to specific spatial development at a national scale or scope. <b>Conclusion the NPF does not accord with the recommendations of the Expert group on this matter.</b>

### Evidence-based Planning?

The submission drew attention to the fact that the lack of objective examination of underlying assumptions lay at the heart of the failure for the NSS.

The Submission specifically referred to ‘Meta-Myths that should be examined and avoided by the NPF.

The analysis demonstrates that the NPF perpetuates and deepens reliance on these narratives which are not supported by objective analysis

TOPIC	NPF	Comment
Metamyth 1 – Ireland’s exhibits ‘unbalanced’ development because of excess development in the east	1.4 What Happens if We do Nothing 2.3 Growing the Regions - By How Much? 2.4 How to Build Stronger Regions - Accessible Centres of Scale 2.5 Should we Build Compact or Sprawling Urban Areas?	These chapters continue to examine and perpetuate this meta-myths without due regard to contrary evidence
Metamyth 2 – Dublin is a failed, sprawling, over-developed city that needs to be contained.		

## Criteria for Success?

The NPF does not succeed in meeting any of the Criteria for success outlined in the previous submission.

Criteria for Success	NPF
Has the implementation of the NPF been tested under a range of Scenarios?	<b>No</b> , the NPF – at 1.4 What Happens if We do Nothing – continues to conflate the consideration of Alternatives with the examination of Different Scenarios caused by changing operating environments
Is the NPF Resilient under a wide range of Scenarios?	<b>Unknown</b> – the relevant resilience testing has not been carried out
Does NPF integrate and co-ordinate at a National level?	<b>Partially</b> The sections below mention and promote the co-ordination of development and activity within the state. However the absence of any spatially specific compilation of these factors means that there is no basis for the practical integration or coordination of these activities or sectors. 4.7 Addressing Connectivity 4.8 Investment Coordination 5 People, Homes and Communities 5.2 Shaping Sustainable Communities 5.3 Healthy Communities 5.6 Education and Life Long Learning 6 Realising our Island and Marine Potential 6.1 Integrated Land and Maritime Planning 6.5 Offshore Renewable Energy 7.3 Working Together for Economic Advantage 7.4 Co-ordination of Investment in Infrastructure 9.3 Ireland 2040 and the National Investment Plan
Does the NPF promote the welfare of the whole people?	<b>No</b> The NDP exhibits a consistent and sustained emphasis on reducing and confining the scope for the development of population and growth by the residents of East Leinster.
Is the economy of East Leinster the Primary Focus of the NPF?	<b>No</b> The NDP exhibits a consistent and sustained emphasis on reducing and confining the scope for the development of the growth of East Leinster.





## Fundamental considerations?

The previous submission identified the fundamental considerations that need to be considered at a national, spatial and strategic level – to ensure a successful NPF.

Consideration	NPF
Does the NPF examine and accommodate the 2 National Spatial Factors? 1/. distribution of settlement is overwhelming located in the eastern part of the country.	<b>No</b> The NDP does not seek to accommodate the continuation of existing spatial patterns of settlement for the growth and of the eastern part of the country
2/. Intrinsic geographic conditions giving rise to environmental factors that limit development are overwhelming located in the western part of the country	<b>No</b> The NPF contains no identification, mapping or discussion of the intrinsic geographic conditions giving rise to environmental factors that limit development are overwhelming located in the western part of the country
Does the NPF examine and accommodate four National Strategic Factors? <ul style="list-style-type: none"> <li>• Demographics</li> <li>• Geography</li> <li>• External Events</li> <li>• Changing Agriculture</li> <li>• Governance</li> </ul>	<b>Partially</b> The NPF discusses changing demographics in a number of sections. There is no examination of the key strategic national issues of;- <ul style="list-style-type: none"> <li>• Geography</li> <li>• External Events</li> <li>• Changing Agriculture</li> <li>• Governance</li> </ul>
Does the NPF Serve the Different Potential and Needs of Different Areas?	<b>No</b> The NPF contains abstract generalisations about 'Rural Ireland' but contains no specific or explicit assessment of the many different types of rural areas and their different and distinctive needs, potential and threats.
Does the NPF Integrate Actors & Plans?	<b>Partially</b> The sections below mention and promote the co-ordination of development and activity within the state. However the absence of any spatially specific compilation of these factors means that there is no basis for the practical integration or coordination of these activities or sectors. 4.7 Addressing Connectivity 4.8 Investment Coordination 5 People, Homes and Communities 5.2 Shaping Sustainable Communities 5.3 Healthy Communities 5.6 Education and Life Long Learning 6 Realising our Island and Marine Potential 6.1 Integrated Land and Maritime Planning 6.5 Offshore Renewable Energy 7.3 Working Together for Economic Advantage 7.4 Co-ordination of Investment in Infrastructure 9.3 Ireland 2040 and the National Investment Plan

Is the NPF flexible and resilient under a wide range of scenarios?	<b>Unknown</b> – the relevant resilience testing has not been carried out
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## National Purpose?

National Purposes of NPF	NPF
Sustaining and increase existing patterns of national success?	<b>No</b> The NPF omits an analysis of the critical success factors – which are described and rejected as a ‘Business as Usual’ Option
Contributing to further economic, social and environmental betterment of Ireland?	<b>Yes – Partially</b> The NPF contains a series of generalized aspirations for economic, social and environmental betterment – but lacks specific spatial, sectoral or strategic measures to achieve this.
Avoiding policies that are based on contrary evidence or assumptions?	<b>No</b> Policies continue to be based upon unquestioned and/or inaccurate assumptions that center around notions of ‘unbalanced development’ and ‘Sprawling Dublin’ Many submission have drawn attention to these inaccuracies.
Addressing and acknowledge existing and evident national trends ?	<b>Yes – Partial</b> The NPF acknowledges some – mostly demographic trends, - but in many cases regards these as undesirable.
Integrating the widest range of national sectoral, social and spatial factors?	<b>Yes – Partially</b> The NPF contains a series of generalized aspirations for economic, social and environmental betterment – but lacks specific spatial, sectoral or strategic measures to achieve this.
Ensuring practical and attainable implementation?	<b>No</b> The absence of spatial or sectoral detail – together with the weak implementation measures mean that implementation is unlikely t be either practical and attainable

### Inclusion of Integrating Strategies?

The Submission drew attention for need for the NPF to put in place 6 Integrating Strategies and priorities to ensure that governmental interventions – by departments and sectors effectively address the following issues

Integration Strategies and Priorities Required	NPF
1. Co-ordination of Rural Transition Strategies for areas of agricultural contraction and intensification	<b>No</b> The NPF seeks to address the symptoms of agricultural contraction and intensification. The reasons and locations are not discussed
2. Preparation of Integrated Management Plans for the protection of Environmental Assets in the context of sustaining enterprises and communities	<b>No</b> The NPF does not discuss or address the constraints placed on rural communities by the absence of management plans for designated habitats
3. Preparation of Integrating Plans for the Atlantic and Belfast- Waterford Corridors	<b>Yes – Partial</b> Parts of sections 4 and 6 address the desirability of having better coordination strategies for these areas. However the absence of specific detail militates against any practical further progress.
4. Preparation of Integrating Plans for the 3 Midland Regions	
5. Integrated Transportation & Infrastructure Provision within Urban Regions	
6. A Strategy to integrate the Greater Dublin Area with other regional economies	

### Addressing Key Trends?

The demographic and economic trends identified in the previous submission will lead to four likely patterns of settlement and activity. These arise from a set of drivers that lie outside the influence of the NPF – though there may be scope to enhance the outcomes. While these trends will undoubtedly continue – the detail of sequence, types and local configuration cannot be readily predicted. A successful NPF will examine scenarios to successfully accommodate these trends under a wide range of scenarios.

Key Trend	NPF
<p><b>Likely Population &amp; Activity Distribution</b></p> <p>Population will continue to urbanise and concentrate principally in the eastern corridor – but also along transportation routes – as has been the trend since the foundation of the State.</p>	<p><b>Yes – Partial</b></p> <p>The NPF acknowledges some – mostly demographic trends, - but in many cases regards these as undesirable.</p>
<p><b>Likely Infrastructure Requirement</b></p> <p>Infrastructure will continue to be required to serve the existing and emerging needs of settlements and economic activities in these development corridors. Developments arising from Brexit and Northern Ireland will significantly intensify the need for fully integrated rail, port, road, air corridors – converging at major termini in Belfast and Waterford.</p>	<p><b>Yes – Partially</b></p> <p>The NPF contains a series of generalized aspirations for economic, social and environmental betterment – but lacks specific spatial, sectoral or strategic measures to achieve this.</p>

<p><b>Emerging Urban Structure</b> Existing develop as units that are full integrated with rural hinterlands in the established Urban Structures will continue to grow and develop. Prosperity and identity will rapidly improve if greater devolution facilitates more responsiveness to local and regional opportunities.</p>	<p><b>Yes – Partially</b> The NPF contains a series of generalized aspirations for economic, social and environmental betterment – but lacks specific spatial, sectoral or strategic measures to achieve this.</p>
<p><b>Emerging Administrative Structure</b> Provision of full integrated public services at a local level will rapidly improve economic and social conditions in peripheral, local and rural areas. The re-organisation of administration will need to be carefully adapted to local circumstances – with existing county structures being most suitable along the western corridor while the Midland and eastern structures will need to be large and regional.</p>	<p><b>No</b> The NPF avoid specific discussion of the details of changed administrative structures that are likely to be required to ensure effective implementation.</p>