

Observations on Ireland 2040 National Planning Framework draft by Jim Walsh

The draft National Planning Framework is an ambitious document that sets out a vision for the development of Ireland up to 2040. Building on the earlier consultation document it outlines possibilities that provide an opportunity to make a break away from trends and patterns that are no longer sustainable. It correctly sets out a comprehensive vision covering many dimensions of the economy, society, culture and environment of Ireland with particular attention to the geographical distribution of opportunities and services, and also to the connectedness to northern Ireland and to the wider world. The scope of this draft is broader than one might have initially expected. It aims to provide a framework to guide planning for all aspects of national development over the next 25 years. In this way it supersedes the broad medium term visions that characterised previous National Development Plans which, apart from the 2007-2013 NDP, were weak on spatial planning and regional development. The belated inclusion of a strong regional dimension in the last NDP had little influence as the NDP implementation was overtaken by the national economic crisis from 2008. Furthermore, the NDP did not explicitly recognise the National Spatial Strategy as the over-arching framework for implementation of all components of the NDP.

The broad scope and comprehensive approach adopted in the draft NPF is to be welcomed as it can become the framework within which all sectoral and other horizontal plans must be designed and implemented over the long term. While sectoral and other plans tend to have medium term horizons at best, it is important to have an over-arching long term national vision and planning framework. It is particularly heartening that the foreword includes endorsements by An Taoiseach and the Minister for Housing, Planning and Local government (the parent department) and also supportive statements from six other government ministers, including Finance, Public Expenditure and Reform. There are two notable absences: Education & Skills and Health. Each of these areas contributes to enabling regional development and enhancing the well-being of the population in different parts of the country. Commitments from these departments would be a welcome addition in the final version of the National Planning Framework.

Rather than commenting on every section of the document my observations are on some high level issues including the overall architecture, the implications of the regional targets, governance arrangements and the challenges of implementing a place-based approach to regional development and spatial planning.

The high level architecture

The draft Framework prioritises the five largest cities while also recognising the important role of regional large towns and local centres including those that serve the rural population. The draft NPF assigns a high level of responsibility to the three Regional Spatial and Economic Strategies (RSES). It is at this level that the prioritisation of regional large towns and other places will occur. The draft also acknowledges that potential tensions may emerge between the cities and other parts of each region, and therefore proposes that Metropolitan Area Strategic Plans (MASPs) will be prepared within the context of each RSES. The NPF is correct to make a distinction between national priority locations (the five cities) and other locations of regional or local significance. However, the time lag between the publication of the NPF and the RSES should be kept as short as possible and all three RSES should be launched at the same time in order to minimise the impacts of local pleading to assign special status to some centres which could undermine confidence in the overall NPF.

The proposal to include MASPs is an important recognition of the need to plan for functional areas rather than administrative areas based on boundaries that are out-dated. Consideration should be given to including in the draft NPF the baseline boundaries and populations of each of the five metropolitan areas and also the target populations and jobs for each in 2040 - that would be more helpful than the data currently in Table 3.1 p.47. There is a separate matter related to the management of the implementation of the MASPs. It is not clear who will lead the implementation of the MASPs, who they will report to, and who will hold them accountable for implementation. A key issue that needs to be clarified is whether responsibility and accountability for the performance of the five metropolitan areas will be directly to the Department in recognition of their national roles, or to the Director and Boards of the three Regional Assemblies in recognition of the roles of the metropolitan centres within each region. Any ambiguity in this area may lead to confusion and distraction from the core objectives.

The regional targets

The draft NPF envisages an increase of approximately one million in the population over the period to 2040. An increase of this magnitude is broadly similar to what occurred over the 25 years from 1991-2016 when the population grew by 1,135,778 or 31.3%. The projection in the NPOF implies a slowing down in the overall rate of growth to 21.8% for the period 2016-2040. If the population increases more rapidly than the NPF projection it will simply mean that the overall targets may be achieved a few years earlier than originally planned – it will not change the overall direction of the proposed adjustments over the coming decades. Careful monitoring of trends evident from each population census will provide opportunities to adjust the overall targets at interval throughout the planning horizon.

A key strategic objective (maybe this should be elevated to a Strategic Goal?) of the NPF is to achieve a 'more effective balance' in population growth between the three regions that would lead to 'regional parity' which is 'considered to be a more reasonable and viable alternative targeted scenario" p. 34. While there may be some academic discourse on the size and boundaries of the three regions they are now a *fait accompli* and it is the task of the Regional Assemblies with support from local and national levels to make the regions effective units for spatial planning. It is useful to compare the proposed population targets for each region with the outcomes from the last 25 years. A continuation of the trends of the last 25 years would constitute a 'business as usual scenario' which is deemed to be undesirable.

The main features of the regional distribution of the population increases over the period 1991-2016 are:

- 55% (= 625,138 persons) of the total increase over the 25 years occurred in the Eastern & Midland region followed by 29% (= 330,680 persons) in the Southern region and 16% (= 179,960) in the Northern and Western region. The respective rates of increase were 36.7%, 26.3% and 27.0% giving an overall increase of 31.3%.
- the long-term summary conceals the divergent trends that were evident in two sub-periods: the boom period of 1991-2006, and subsequent period 2006-2016 of economic collapse with only the beginning of a gradual recovery evident by 2016. In the boom years (1991-2006) a little over half (52.5%) of the total increase occurred in the Eastern & Midland region followed by 30.6% in the Southern region and 16.9% in the Northern and Western region. More importantly, the inter-regional variance in growth rates was relatively small: 18.9% in the Eastern & Midland regions, 15.6% in the northern and Western region and 15.0% in the Southern region.

- Significant changes occurred in the decade after 2006. The Eastern & Midland region accounted for an increased share (58.1%) of the growth while the shares in each of the other two regions fell from 30.6% to 27.4% in the Southern region and from 16.9% to 14.6% in the Northern & Western region. The rates of increase in both the Southern region and the Northern & Western region were identical at 9.9% and significantly lower than the 15% in the Eastern & Midland region. Thus in both sub-periods the rates of population increase in the Southern region, which includes three of the five cities, was no greater than in the more rural Northern & Western region.
- Within the Eastern & Midland region the most notable changes were in Dublin city and Dun Laoghaire which had a combined increase of 72,323 compared to 28,396 over the previous 15 years. The average annual increases in South Dublin, Fingal, Louth, Kildare and Wicklow were also greater than for the 1991-2006 period. Thus there is evidence of an eastward shift in the region population over the past decade.

The draft NPF envisages an increase of just over one million in the total population with targets for a significant change in where the growth might occur. Thus, using the mid-points of the ranges provided in p.35 of the draft NPF, the target is for an increase of 487,500 in the Eastern & Midland region (20.2% increase) followed by 362,500 (26.1%) in the Southern region and 162,500 (18.0%) in the Northern and Western region. The following observations on this scenario are pertinent:

- The NPF target is that just under half (48%) of the projected increase will occur in the Eastern & Midland region followed by 36% in the Southern region and 16% in the Northern & Western region. The corresponding shares for the 2006-2016 period were 58%, 27% and 15% respectively. Thus the NPF envisages a drastic reduction in the Eastern & Midland share and a significant differentiation between the two other regions which previously had experienced equal growth rates. The proposed adjustments are linked to the targets set for the five cities.
- The scale of the proposed adjustments can be observed by calculating the differences between the NPF regional targets and what might occur under the 'business as usual' scenario using the regional shares of the 1991-2016 increase as the scaling factor. While the NPF scenario implies an increase of 487,500 in the population of the Eastern & Midland region, it also implies a reduction of 392,000 in the potential Eastern & Midland total. By contrast the NPF targets imply increases of 311,000 and 81,000 more than the 1991-2016 trend in the Southern and Northern & Western regions. The comparable increases in the two regions over the 1991-2016 25 year period were 331,000 and 180,000 respectively.
- If the more recent changes in population distribution over the period 2006-2016 are taken as the baseline the NPF targets imply a reduction of 567,000 (55%) from what might be achieved under the 2006-2016 share of total growth scenario in the Eastern & Midland region. By contrast, the NPF scenario implies an additional increase over the business as usual scenario of 412,000 in the Southern region and 155,000 in the northern and Western region.
- No matter which period is taken to represent the baseline for a continuation of business as usual the NPF scenarios for the three regions involve a very substantial departure from the past. The scale of the proposed adjustment may be lauded as setting a very high level of ambition to achieve a radical move towards a new regional equilibrium. However, is it reasonable to wonder if an adjustment of such magnitude can be achieved within the timeframe. The level of natural increase in the population of each region will not be sufficient to achieve the desired level of redistribution. Much will depend on the capacity to

influence internal migration patterns between the three regions, and especially on the workplace and residential preferences of the immigrant population. The positive and negative implications of slowing down the growth of the Eastern & Midland region should be assessed and included in the report, and consideration might be given to the implications of a smaller adjustment with more focus on the benefits that might be achievable via smart and compact development in each region. Likewise, the expectations in relation to the three cities in the Southern Region are very high when considered against the evidence over recent medium and long term periods of growth.

- The regional population targets are likely to become key performance indicators for the NPF, if for no other reason than that they are easily measured. There is likely to be a high level of interest in future trends in the components of demographic change and in the distribution of population as proxy metrics of the overall sense of regional balance. A risk that needs to be considered is what might be the implications for the entire NPF if sufficient progress is not made towards achieving the population targets. It would be useful to set some high-level interim targets for 2026 which could provide an opportunity to assess whether the longer term targets require revision.

Table 3.1 in the draft NPF summarises the targets for population increase in each of the cities. Combining the data in this table with the regional targets on page 35 one can deduce some insights on the likely intra-regional balances. In the Eastern & Midland region the targeted increase of 264,000 for Dublin city and suburbs implies an increase of 223,500 in the remainder of the region. However, the Dublin city and suburbs total significantly underestimates the population of the metropolitan area. In order to scale back the growth of the Eastern and Midland region as a whole to comply with the NPF target will require strategic decisions via the RSES that may prove to be problematic. For example, it may be that in the interest of achieving greater intra-regional balance the greatest scaling back may need to occur in the old Mid-East region at locations beyond the metropolitan boundary. While this is primarily an issue for the RSES, the NPF should elaborate more on the desirability of greater intra-regional balance and on the implications of the regional targets for achieving balance within the region. Without some indication that the RSES will seek to achieve greater inter-regional balance there is a risk that the focus on the cities may be interpreted as supporting an outcome that may be more uneven within the regions. It would be preferable to include estimates of the populations of the metropolitan areas in Table 3.1. If this cannot be done it may be wiser to omit Table 3.1 as it is unclear how useful the baseline estimates are and what they might be compared against in the future.

In the other two regions the RSES will need to cater for substantial increases beyond the cities: for 45% of the targeted increase in the Southern region and 73% in the Northern & Western region. Thus the RSESs will be particularly important for these regions, probably more important than the NPF. However, in order to respond to local expectations the RSES will need to be formally recognised and resourced as central components of the NPF.

There are some additional points in relation to the regions. The issue of inter-urban connectedness is highlighted and prioritised in the NIP. There is no mention of the need for an outer orbital route to facilitate movements to the west of the Dublin metropolitan area – it seems inconceivable that such a route will not be needed by 2040. Secondly, it will be important that strong transport linkages are maintained between the regional large towns and the routes connecting the five cities – strong connections will facilitate opportunities for the regional large towns to benefit from the expansion of the metropolitan engines in the regions. Lastly, the section on Empowered Rural Communities, p. 136, relies heavily on the Action Plan for Rural Development (APRD). The first iteration of the APRD has been welcomed but it needs further refinement and especially more focus on prioritisation. The

final bullet point on p. 136 advocates on-going support “through a well- funded Common Agricultural Policy for the agri-food sector” . This statement referring to a major policy affecting one sector does not seem appropriate for inclusion in the NPF. It could be interpreted in future as an endorsement of the CAP which may not be helpful in a wider discussion of supporting the broader rural economy and society. For example, the EU co-funded Rural Development Plans are managed by a different government department with a particular audience from the department that manages the from the APRD.

Implementation and Governance of the NPF

Chapter 9 correctly states that the responsibility for successful implementation and governance of the NPF will be shared across many government departments and several agencies that report to the departments. Local communities, civic society and the private sector will also be required to contribute towards the achievement of a shared vision. In order to achieve the radical adjustments that are proposed it will be necessary to invest in developing new modes of working together across all the stakeholders. The alignment of the National Investment Plan 2018-2027 is a very welcome achievement from this process that provides an important signal for future planning. The focus of the NIP is however mainly on capital investment in physical infrastructure which is a necessary but not a sufficient condition for regional development. It has been recognised for some time that in order to maximise the returns on investment in physical infrastructure there also needs to be a strong investment in soft infrastructure – technical, administrative, leadership and management capacity building among all stakeholders. I strongly recommend that the NPF include an objective to invest in capacity building.

Much of what is proposed in the NPF is well aligned with current thinking on place-based development strategies. A key element for success in the implementation of place-based strategies is an acceptance by all stakeholders of the necessity to adopt new styles of strategic planning that genuinely combine top-down and bottom-up inputs through a partnership approach that encourages and rewards innovation. There are many ways in which different stakeholders can work together extending from relatively weak forms via coordination to stronger approaches based on cooperation in planning and implementation, to collaboration where the partners go further and commit resources to share projects. The language in the draft NPF is mostly about coordination. There may be instances where the requirement might be stated as cooperation or collaboration – this could be incentivised thorough the two Smart Growth Initiatives¹.

It is very important that the NPF will have statutory underpinning. It is important as a safeguard against challenges to implementation, and also as a means of securing continuity of political support over the NPF period – or at least to provide protection against future governments abandoning or rewriting the NPF. Given the centrality of the RSES it will also be important that they have statutory support.

¹¹ A recent book published in 2015 by Robin Hambleton on *Leading the Inclusive City – place based innovation for a bounded planet* may be worth looking at. There are a number of influential reports / papers on place-based approaches to regional development, starting with the 2009 Barca Report on *An Agenda for a Reformed Cohesion policy – a place based approach to meeting European Union challenges and expectations*, prepared for the European Commission. Another is a paper by Barca, McCann and Rodriguez Pose 2012 on *The case for regional development intervention: place based versus place neutral approaches*, in *Journal of Regional Science*, available on the web. And also Rodriguez –pose and Wilkie 2016 *Revamping local and regional development through place based strategies* – on web. I would caution against the reference to the World Bank report on p. 23 – citing this report on its own gives a privileged position to World Bank wisdom that is not universally shared – you may be handing a stick to some commentators to beat the conceptual underpinning of the NSS / NPF!

While the statutory support is very important it is almost in the realm of a 'stick' There will also need to be some 'carrots'. The local authorities (executives and elected members) will need to buy into the RSES and NPF and so will all government departments and agencies and other stakeholders. They will need to be convinced of the vision, that it is achievable and that it yield win-win outcomes. The investment in capacity building that I mentioned above will be critical in this regard.

Finally, there will need be on-going monitoring involving collection, analysis and sharing of data at appropriate levels of detail for all stakeholders. This might be added as another objective in chpt 9.



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