



INTERNATIONAL CENTRE FOR LOCAL AND REGIONAL DEVELOPMENT (ICLRD)

Submission to the Final Consultation on the National Planning Framework (NPF)

Ireland 2040: Our Plan

November 2017

The International Centre for Local and Regional Development (ICLRD) welcomes the publication of *Ireland 2040: Our Plan* (September 2017). As the spatial aspect to wider government policy until 2040, we broadly agree with the key themes presented in the National Planning Framework (NPF) consultation document; namely:

- Effective regional development driven by second and third tier cities;
- Planning for the revitalisation of Irish towns and villages; and recognising the mutual complementarity that can be achieved in recognising and supporting the urban-rural interface;
- Placing a strong emphasis on marine spatial planning;
- The inclusion within the goal of sustainable mobility of
- The importance of transitioning to a low carbon economy – with the associated implications this has for climate adaptation, growing the renewables sector, and green infrastructure planning.

Given the focus of much of ICLRD's work in the Irish border region over the past decade, we are heartened to see a chapter within the draft NPF focusing on 'Working with our Neighbours' (Ch. 7). Having a long-term vision for the future growth of Ireland, including its inter-relationships with Northern Ireland and the U.K. on a North/South and East/West axis, is core to the achievement of sustainable balanced development.

The Centre does, however, have concerns regarding the weakened emphasis attached to the concept of place-making which was so strong in the original Issues and Choices Paper (February 2017) – a dilution clearly demonstrated by the lack of focus/emphasis placed on the key role to be played by large regional towns; the somewhat skewed geographical distribution of the city-regions upon which the policy of effective regional development is based; and, in terms of connectivity, the lack of discussion around electro-mobility (outside of electric rail) and the implications of this for sustainable transport planning and settlement design.

As Ireland emerges from a very difficult recession that impacted so significantly on people, place and well-being, there are already signs of significant pressures bearing down on existing infrastructures. In planning for the next twenty years, it is essential that the implications of any development on infrastructure is considered – together with their associated ecosystems – and that this, in turn, is aligned to the National Investment Plan for Ireland.

This response has been prepared by the following members of the ICLRD (see Appendix A for further information):

- Ms. Caroline Creamer, Director
- Ms. Caitriona Mullan, Executive Board Chair

We would be happy to liaise with the Department directly on any of the points raised in the following submission via our Director, Ms. Caroline Creamer – see Appendix 1 for contact details.

1.0 Effective Regional Development

- 1.1 The NPF recognises that the population of Ireland will increase over the next twenty+ years by 1million people. This will create a demand for an additional 500,000 homes and 600,000 jobs. At the same time, the population is ageing. As recognised within the draft NPF, a growing and changing population will have different needs which, in turn, will have implications for how we plan and for whom. An ageing population, for example, brings with it associated health and service needs. Decreasing household sizes raises questions about the suitability of the current housing stock and the type of dwellings that we should be constructing over the medium-term. The current and projected distribution of employment growth raises questions around congestion, sprawl, commuting patterns and work-life balance – all of which, in turn, feeds into housing pressure points.
- 1.2 There is widespread acceptance that spatial development patterns have been driven by excessive development over the past twenty or so years and that this is unsustainable. Ongoing concentrations of population and employment along the Eastern Seaboard corridor is not sustainable. The necessary infrastructure to support such growth is not in place – and the costs to redress this now are prohibitive. As a result, the commuter belt could be regarded as being ‘out of control’ – stretching as it does to parts of Cavan and Laois. Long commutes ensue which negatively impact on work-life balance and general health and well-being.
- 1.3 We agree with the argument that treating all parts of the Country in the same way is unrealistic - this will not achieve equality of outcome or contribute to a stronger overall set of national outcomes. We support the adoption of a diverse approach to different regions, building on the place-based assets of each. This will be the key to releasing the full potential of the regions, the NPF as a medium-term strategy, and in assisting the regions to mitigate the likely challenges that Brexit will present for the Irish and all-island economy.
- 1.4 The general principle of ‘effective regional development’ requires, and commits, government to recognise the unique spatial geographies of the various regions across the State, and the requirement for a bespoke approach to regional challenges and opportunities across Ireland. The ICLR D calls on the Government to designate the North West City Region (centred on Letterkenny-Derry-Strabane) as a core metropolitan area – thus improving the spatial distribution of the effective growth strategy being pursued by the Government; with a Metropolitan Area Strategic Plan to be prepared through the RSES process. This City Region is both a national and sub-regional economic driver for both jurisdictions on the island of Ireland. While the two Council areas combined have a regional population of 309,292 (2016 figures), its wider functional area expands to take in a wider hinterland of 350,000-400,000 people. Of the current population, 34% are under 25 years of age. 39% of the population 16years + has a Level 3 or above educational qualification. The North West City Region currently has a higher and further education student population of 40,000. The region is home to two major acute regional hospitals. Through an analysis of three of the main cross-border road networks, this region experiences

over 326,577 cross-border traffic movements per week; highlighting the significance of the interactions taking place in this cross-border region. This City-Region is the only functional economic region of such scale on the island which experiences a national jurisdictional border. This designation will (a) compliment the commitment to the Dublin-Belfast Corridor on the Eastern Seaboard, and (b) add value to the wider Northern and Western Region by providing a City Region focus to an under-served region characterised by historic under-investment, smaller towns, and rural peripherality.

1.5 Key to unlocking the potential of the North West City Region is growing the population; a core objective of the North West Strategic Growth Plan. It is essential, therefore, that the population projections being pursued in the NPF do not act as a barrier to unlocking the potential of this City Region. The NPF needs be a flexible and agile Framework in this respect – where growth in one area will not negatively impact on the potential of another.

2.0 Health and Well-Being

2.1 The ICLRD fully welcomes the emphasis placed on population health and wellbeing. Unprecedented growth over the past two decades has created housing pressure points, resulted in greater distances between where people live and work and fuelled longer commutes. This has profoundly affected people's health and well-being, but also the sustainability of the natural environment. Added to this is the challenges posed by an ageing population which has far-reaching implications for all aspects of society

2.2 Creating direct links between planning and infrastructure provision, and planning and the environment/health is long over-due. Central to this will be an education and promotion campaign that ensures citizens want an active voice in the local and strategic planning policy and practice. A cradle to the grave philosophy to healthy living needs to underpin the NPF's approach to health and wellbeing. A more comprehensive analysis of the role of planning in health outcomes is required. This is particularly important in areas of high urban and rural deprivation where health inequalities are more concentrated. While this is a national issue, particular reference should be made to the evidenced impact of the border on health and wellbeing.

2.3 Reflecting on the submission to the Issues and Choices Paper, good spatial planning helps improve the 'liveability' of areas (Barton 2009). Northern Europe provides some inspirational examples of how environmental sustainability and supporting healthy lifestyles can come together through spatial planning. In Vauban (an extension of the Germany city of Freiburg), for example, 70 Per cent of trips are made using active travel modes (University of West of England, 2009). Within Leeds City Council, a health and well-being strategy has been embedded in the Council's Core Strategy – its strategic spatial planning document for the period 2012-2028. A key focus of the Strategy is the delivery of sustainable development, which takes into account a range of economic, social, and environmental issues – including health.

- 2.4 With ever-lengthening waiting lists and a growing shortage of doctors with specialisms in general practice and chronic disease management, there is a growing need for collaboration between hospitals, including on a cross-border basis, for the delivery of certain services; as already exists, for example, between Letterkenny University Hospital and Altnagevlin Hospital. This existing model validates the benefits of a cross-border approach to mapping health outcomes. Servicing a broader catchment increases the relevance of each hospital and the potential for new medical, and research, centres to open up. It creates the potential for synergies between such centres and both primary and secondary health care facilities.
- 2.5 As well as making specific provision for the planning of ‘healthy’ infrastructure – whether active travel modes and/or greenways and blueways for ‘down-time’ – consideration must also be given to the migration to electric and autonomous vehicles – a global agenda gaining traction – and the implication of this for sustainable transport planning and settlement design. This migration to electromobility has significant implications for the environment also in terms of contributing to the end-goal of achieving low-carbon/zero-carbon economies and improving air quality.

3.0 Place-Making

- 3.1 Adopting a place-based approach to future development and investment must acknowledge the functional relationships between places and the movement of people between places. The Framework for Co-operation: Spatial Strategies of Northern Ireland and the Republic of Ireland (2013), while non-statutory, affords both jurisdictions on the island of Ireland opportunities to work together to harness strategic development opportunities. The Framework encourages policymakers to take account of the wider impact of their work and exploit opportunities from a broader perspective. In the context of Brexit, and the many uncertainties it brings in its wake, this document will be a key instrument in supporting both administrations to work together on those challenges mutually shared.
- 3.2 While emerging policy is to direct future population growth to Ireland’s cities as a way to support effective economic and social development, such a strategy should not only be about cities. Below this tier of settlement, there are a number of towns – based on their catchments and service delivery role – that serve an important role for those hinterlands falling outside the reach of cities. The failure of the NPF to name any of the larger urban regional towns and clearly define the role they are to play in effective regional development is very disappointing. The naming of large towns – and determination of their role and function and future growth – has been left to the Regional Assemblies and the RSES’s; and approach that risks returning to the model of the NSS and ‘one for everyone in the audience’ because of the political nature of these bodies.

- 3.3 There is a need for a longer-term strategy for rural Ireland; that sits between the NPF and the Action Plan for Rural Development; and which can recognise the role and place of the 'rural' within wider, and more effective, regional development. The role of the rural within wider functional territorial policy must be examined in more depth; with initiatives at the functional territory scale ensuring initiatives are of strategic regional importance. Lessons can be learnt for elsewhere; for example, urban-rural partnership programmes in Germany which have challenged metropolitan and rural districts to identify potential synergies and means of working together. The sustainable growth of rural Ireland will support the urban engines of growth on this island.
- 3.4 In addition to the recognised role of cities and large regional towns in driving effective regional development, there is a need:
- To ensure funding programmes are aligned to support the development of these cities and their associated strategies (Limerick 2030; Cork 2050, North West Strategic Growth Plan, etc.).
 - Regional population growth targets for the Northern & Western Regional Assembly Area should be revised upwards – from 175,000 to 200,000 - to provide for the future growth of regional population.
 - Recognise the potential of the Belfast-Dublin functional corridor and the council areas in between by both building on existing linkages such as the Newry – Dundalk Twin City Strategy and Newry/Mourne-Down-Louth MOU.
 - Build on the potential of the Atlantic Economic Corridor (AEC) on the northern and western seaboard – complimenting the Dublin-Belfast Corridor. In developing the concept of the AEC, the ICLRD agree that Galway City has a clear role to play as the central hub of the Corridor. Complimenting this, the Corridor should then be built from the two outer-ends inwards i.e. from the North West City Region to Galway; and from Waterford City to Limerick and onwards to Galway.

4.0 Environmental Sustainability

- 4.1 Environmental assets do not adhere to man-made boundaries and it is widely recognised that there are many challenges - and opportunities - in integrating environmental management and development strategies at national, regional and local-policy level. Ireland's distinctive landscape is a living environment – a mix of settlement, wilderness, and protected areas. How these spaces comfortably co-exist can be challenging - especially in the areas of tourism, renewable energies, strategic infrastructure provision, etc.
- 4.2 The *Framework for Co-operation: Spatial Strategies of Northern Ireland and the Republic of Ireland* (2013) recognises the island of Ireland faces spatial challenges in the areas of environment, climate change, transport, energy, housing, and telecommunications. This joint document by the Department of Environment, Community and Local Government and Department for Regional Development posits that the Framework is a means of co-operation to address such challenges –

and thus avoid future instances of ‘back-to-back’ planning. In terms of environmental quality, the Framework notes the need for strategic co-operation on protecting and enhancing the built environment, and shared natural and cultural heritage assets esp. in terms of water quality, habitats, and air quality. This document becomes increasingly significant in the context of Brexit.

- 4.3 At a recent RTPI Ireland/Northern Ireland conference in Dundalk, it was suggested that the Habitats Directive will possibly be one of the first EU Directives to be repealed in the U.K.; its impact on infrastructure planning to date has made it contentious. The repeal of EU Directives will inevitably lead to regulatory divergence between Ireland and Northern Ireland. This would, in turn, result in environmental problems. Recent work by Newcastle University, involving ICLRD¹, cites the example of applying the EU Water Framework Directive to water quality on one side of a river while a different standard applies on the opposite bank. This is true also of climate mitigation measures. The *Framework for Co-operation* opens the door to cross-border agreements being put in place to avoid such situations arising. The Framework, and its importance, should therefore be noted in the NPF.
- 4.4 With the island of Ireland’s prime geographical position in the resource-rich location of North West Europe, and with innovations in wind, water and wave and even algae technologies, Marine Spatial Planning will be a vital process to enable renewable technologies to shape the future energy mix and to allow the island to emerge as a renewable energy exporter. There is scope for much innovation in this sector; and the NPF has an opportunity to be very progressive in this space. Learning from Scotland, with its’ ambition and drive to being ‘a low carbon place’, the ‘Blue Seas-Green Energy’ offshore wind plan (Marine Scotland, 2011) identifies offshore developments and is complementary to the National Renewables Infrastructure Plan. Scotland is further innovating in developments that could be easily adopted for the island of Ireland, such as the establishment of a Marine Energy Park like they have created for the Pentland Firth and Orkney Waters. The ICLRD believes there is scope for the NPF to be equally as visionary and innovative in this agenda.
- 4.5 The NPF should clearly define the need for Regional Landscape Strategies – with the regions taking a leading position on the protection, management and planning of landscapes.
- 4.6 The NPF should give specific attention to the issues of energy supply and resilience, linking these not only to the renewable’s potential of a region but also to opportunities that may exist for greater energy supply. For example, progress on the North-South inter-connector remains vital to the central border region and North West. Also, for places such as Donegal there are opportunities to connect to existing infrastructure e.g. at Coolkeeragh which is situated on the other side of Lough Foyle, a shared environmental asset which is managed through the Loughs Agency.

¹ Centre for Rural Economy (2017). *After Brexit: 10 Key Questions for Rural Policy in Northern Ireland*. Newcastle: Newcastle University

5.0 Infrastructure Investment

- 5.1 The regions outside of Dublin offer a range of growth and investment opportunities; latent assets yet to be untapped which have the potential to offer competitive advantage. Key to realising the competitive advantage of regions is improving connectivity and building the infrastructure of the regions; particularly in the North West and central border areas. Firstly, this includes recognition of and the continued expansion of air and port access - Ireland West Airport Knock, Derry City Airport, Port of Derry, Port of Killybegs; and upgrade of the Ten-T and national road network from Dublin-Letterkenny/Derry and Galway-Sligo/Letterkenny. This includes the N2/N14/A5 and the N15/N13 link; as well as the upgrade of the N2/N14/A5 to a Ten-T high quality road standard from the North West City Region to Monaghan and on to Dublin; and the development of the Atlantic Economic Corridor from Galway to Letterkenny and Derry to a Ten-T High Quality road standard. Secondly, this should include outstanding commitments under Transport 21 (N2/A5/N14, N15, N17, N6, Limerick-Cork Motorway), sustainable energy projects including on-shore and off-shore renewables, and the North/South inter-connector to name but a few.
- 5.2 There are significant disparities across Ireland in terms of access to broadband. This is well understood in terms of the urban-rural divide; less well so in terms of the internal urban disparities that exist. The National Broadband Plan (NBP) is seen as playing a key role in regional development – underpinning job creation, promoting social inclusion and reducing travel needs (and consequently contributing to the low carbon agenda).
- 5.3 These national priorities must be supported through the implementation of the National Planning Framework, and be defined in the National Investment Plan.

6.0 Implementing the National Planning Framework

- 6.1 There has been widespread agreement from the very outset that there needs to be clarity around how the NPF will be implemented, how it will be resourced and how its progress will be tracked (Kitchin, IrelandafterNama, 4 February 2017). It is increasingly recognised at all levels of government that how we live and work does not adhere to administrative boundaries but more so to functional boundaries. This needs to be reflected in the implementation of the NPF with key delivery agents being encouraged to cooperate across and outside of their administrative borders.
- 6.2 The ICLRD welcomes the enhanced coordination role for the North South Ministerial Council and British-Irish Council in specific national planning and infrastructure activities. While we understand that further conversations are required on what this will look like, it would be helpful to have further clarification on this role in the final NPF.

6.3 Potential barriers and risks to implementation are mainly lack of understanding of not only the core objectives of the NPF and their inter-relationship between spatial planning and other sectors such as economic growth, connectivity, environmental management and health and well-being. Redressing this requires an education and promotion campaign that ensures citizens want an active voice in the local and strategic planning policy and practice, including on the delivery of the NPF. Indeed, there is a clear need for much more action research that is aimed at the general public and which details spatial inter-relationships and resulting good and bad practices under certain conditions.

6.4 Lack of strong leadership is a further challenge to the implementation of the NPF; with again a clear need for investment in networking and facilitatory supports in this area.

6.5 Collaborative structures, matrix working and working with external broker/ capacity building influences – as encapsulated by the North West model - highlights the importance of (up)skilling core teams (Chief Executives, Directors of Services, Senior Managers) to adopt the functional area approach of strategising and planning. Such an approach must be regarded as part of core business (rather than sidelining into specialist functions). Working arrangements cannot be rigid – they must be flexible to facilitate joint coordination and redress of issues as they arise.

key indicators for measuring the successful implementation of the NPF include:

- Population Growth
- Employment Creation / Growth
- Housing Development - compact / one-off
- Commuting patterns
- Travel times
- Active travel networks
- No. of shared transboundary area development plans created
- Industry growth – incl. growth in clusters
- Increased frequency of flights to regional airports
- Increased R&D between education bodies and companies
- Improved population health outcomes
- Reduced carbon emissions
- Water Quality
- % increase in energy coming from renewables

The Regional Indicators Report carried out jointly by the former eight Regional Authorities provide a sound basis for development of an implementation plan and relevant indicators that could also be used in the NPF.

Appendix 1: The International Centre for Local and Regional Development (ICLRD)

The ICLRD is a North-South-U.S. partnership that has developed out of a unique collaboration between academics and spatial planning specialists from the National Institute for Regional and Spatial Analysis (NIRSA) at Maynooth University, the School of the Built Environment at Ulster University, and the Institute for International Urban Development in Cambridge, Massachusetts. Currently celebrating its 10th birthday, the ICLRD was formally established in 2006 and, over the past ten years, has become a builder of bridges, a promoter of good planning, an honest broker and facilitator of change, and a driver of peace and reconciliation on the island of Ireland and elsewhere.

A central objective of the ICLRD is to strengthen the policy and operational linkages between central, regional and local policy-makers and among officials and practitioners involved in spatial planning and social and economic development across the island of Ireland. We support central, regional and local government in the achievement of policy alignment, capacity building, citizen engagement, and stronger data analysis in decision-making. We work with communities to support the implementation of government programmes such as town and village revitalisation, identifying functional areas and the economic opportunities generated by these spaces, and promoting activities that place a greater emphasis on recognising and building on the potential of places and their people.

We engage in a wide range of activities that inform policy, support transformative change, build capacity, create networks and promote good practice. This is achieved through:

- action research reports, policy briefings, articles and other publications;
- professional education and capacity building programmes that assist local governments and communities to translate policy into ‘on the ground’ action; and
- active outreach and networking that includes conferences, workshops and international cooperation and exchanges to identify best practices.

The ICLRD is a prescribed organisation in respect of nominations to An Bord Pleanála.

For further discussion on this submission, please contact the ICLRD Director, Ms. Caroline Creamer at details below.

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