Feedback on Draft National planning framework 2040

ESRI basis

- ESRI are now projecting 1m by 2030, not 2040, therefore growth projections to 2030 have to be added, and another reforecast to 2040

Implementation & measurement

Following the experience of our 350m investment across the various sectors into North Quays SDZ in Waterford, it became apparent that none of the departmental plans in Tourism, Transport, Trade (retail & leisure), sustainability, Housing were co-ordinated. E.g. Tourism was to grow 15% p.a., whilst transport grew 3% and housing grew 3%; that led to significant constraints of forward projections, inaccurate by some 50-60%.

Basis of growth

Table 3.1 of Ireland 2040 population is significantly misleading as the basis for growth.

Whilst it's based on borders & municipalities (CSO), if it were based on population within catchment & drive-times for the city & suburbs (up to 20 minutes) and NOT borders/municipalities, the current catchment populations in the regional cities are as follows:

				Drive times		
Catchment population's	**00' - 05'**	**05' - 10'**	**10' - 15'**	**15' - 20'**	**0-20'**	**00' - 60'**
Cork	36,393	100,586	60,375	60,657	258,011	571,515
Waterford	25,725	28,814	9,966	23,306	87,811	437,467
Limerick	39,995	55,400	18,564	18,330	132,289	461,039
Galway	26,413	44,309	21,409	16,358	108,489	369,411

Note Waterford: **87,811** people within 0-20 minutes.

This compares to Table 3.1 of 54,000; a difference of some 25,756, or 50% underestimate.

Table 3.1 | Ireland 2040: Targeted Pattern of City Population Growth

City	Population 2016	Population Growth to 2040[18]		Target Population 2040
		% Range	People	
Dublin - City and Suburbs	1,173,000	20-25%	264,000	1,437,000
Cork - City and Suburbs	209,000	50-60%	115,000	324,000
Limerick - City and Suburbs	94,000	50-60%	52,000	146,000
Galway - City and Suburbs	80,000	50-60%	44,000	124,000
Waterford - City and Suburbs	54,000	50-60%	29,000	83,000

Population growth

City	% growth (16 to 2040)	People added (by 2040)	Target population 2040 (Catchment driven)	Target population 2040 (Draft 2040)	Variance between target (catchment driven) and Draft 2040 Plan: Population
Cork	50%	129,006	387,017	324,000	63,017
Waterford	50%	43,906	131,717	83,000	48,717
Limerick	50%	66,145	198,434	146,000	52,434
Galway	50%	54,245	162,734	124,000	38,734

If the target of 83,000 by 2040 is followed by region & Councils, it would see a population decline in Waterford planned and it's resultant impact for investment, for housing, healthcare, universities & schools.

If catchment driven, the growth is 63,017 increase in population in Waterford, and a further c30,000 homes to built on top of current undersupply.

For Cork, it's 63,017, Limerick 52,434 and Galway 38,734, or 202,900 across the four regional cities.

Overall, instead of achieving 1m population growth into the 4 cities and their suburbs, the 2040 draft only delivers 677,000 in the 4 regional cities; a shortage of 373,998, or 30% short already versus Planned target.

As a result, any future projections are inaccurate if not based on catchment.

The current population growth is also constrained by migration of some 50,000 18-30 year olds a year; this makes population growth constrained.

Further, the diaspora could return following Brexit and a return to growth and a stable housing market. That could see 200-500k people added nationally, or, 50k to each region outside Dublin.

It could be argued that with greater focus on job growth in the regions where migration is high (South East, West where Action Plan for jobs has only delivered 10% versus target by IDA), migration would lessen and population growth could be higher by some 10,000 a year, or over 10 years, 100,000 added to West & South East.

As a result, the ESRI projections have to be combined with the above more accurate catchments to build accurate housing, health & schooling demand projections or we end up with the current constrained growth.

It could also be argued that the cities with the least dense population in their catchments (Waterford & Galway), have to receive job growth & investment ahead of other cities, hence SDZ support and rapid growth in the next 2-3 years.

Following the “catch-up” by 2020, investments happen in other regional cities.

Metrics, performance, dashboard and accountability

- It’s recommended that each region, city & county will have a central digital (open sourced) dashboard to track actual performance and update projected growth (quarterly and annually) across departments, that will allow stakeholders (public, investors & public servants) track performance vs actual plan.

- Either a regional team, or central team (ie CSO combined with strategic planning units) are to have this responsibility to enable a team to develop & share insights on progress across regions. This reduces the risk of underdelivery, and instead would see acceleration of the plan, as there are limited metrics to track actuals in departments at the moment (e.g. energy, housing, retail spends, banking / lending) or where they are, they are released late (e.g. tourism releases are 9 months after collection), or, highly inaccurate (e.g. housing, tourism.)

- Related to the Metrics & Team, it’s recommended there is a National Implementation team that has clear incentives to drive improvements, not connected to Government/local councils, so political bias & inertia / status quo default is removed from planning & delivery bias.

- Metrics established to track progress are to be connected to good examples like Dublin Dashboard, however all the dashboards are historic, not projecting growth.

Investment/Foreign investment & financing of growth

- The lack of cross-departmental alignment, a lack of metrics/measurement, and a lack of 2030 & 2040 targets means financial backing of investments will prove unlikely, as there isn't the transparency of metrics (actual or planned) across all departments.

- This lack of transparency also increases the perceived (not real) risk in financing and either the government is prepared to underwrite growth, or the cost of financing regional growth will be higher than city / Dublin growth. In reality, with over 15bn being invested privately in growth in each regional city by 2040, or collectively across the Four regional cities of 60bn, the strong growth pipeline will attract Sovereign Wealth Funds and strategic partners in growth countries seeking to fund growth IF marketed well. Irish Banks neither have the capacity nor capability nor competition to fund growth given current levels of profitability.

- This can't be allowed to happen and below outlines how to avoid this risk.

Supporting growth

- It's advised that regional community banks are set-up within 18-24 months to enable growth in rural & regional economies. With mortgage rates 50% lower than commercial banks, this would see some 4bn added to the consumer spend in rural & city areas, or, act as the catalyst to restore growth, as 4bn supports some 40,000 jobs.

Sustainability

- Our sustainability ambitions aren't aggressive enough and this plan & strategy puts us at a disadvantaged to other EU & OECD nations as investors are now placing ESG front & centre of investment decisions
- The sustainability targets need to be a) clearer and NOT and b) tied into sectors
- By 2040, our target has to be be carbon positive; In farms, in data centres, in fintech, in buildings, as sustainability can be an export like other "hard" exports.
- As such, our sustainability not just leads to significant job creation, but also becomes a source of inwards investment and export potential for indigenous companies.
- The language needs to be clearer; the government "support" has to be one of "government leads" ; i.e. government buildings carbon positive, public

sector employees to have 100% EV by 2030, public sector housing to be zero carbon by 2025. Thus, Sustainable construction acts as a positive economic,social and cost driver to growth in the likelihood of a downturn / recession, but also, the capability built allows construction & digital businesses to export this capability internationally.

- If we don't lead, it will see imports/balance of payments as companies come here to apply their skills and lead to further offshoring of profits.
- There is a complete absence of reference to our underperforming sectors i.e.
  - Agriculture:
    - As agriculture sector the least sustainable in Europe on a kg/CO2 per kg food, which if not improved, is a strategic threat to food exports. We should state "our sectors in agriculture will be carbon positive by 2025 through ensuring refitting & rollout of existing sustainable technologies." Doing so will boost farm profitability by 1.6bn a year and reduce carbon footprint by 30%.
  - Transport:
    - Our public sector transport fleet to be powered by EV / Hydrogen or fossil-fuel free by 2025 in regional cities and by 2030 in Dublin
    - Our public transport networks will be zero carbon by 2030
    - Our regional city centres to be carless by 2030 & Diesel-less by 2025
    - EV's will be 100% of new car purchases by 2025, saving car owners c3-4k in running costs a year. That requires alignment with construction of new homes below.
  - Building & construction:
    - Growth in the 2040 plan requires over 500,000 homes to be built. These can be pre-cast or build passive, ensuring homes carbon impact is reduced by 80% during the build phase and 80% through life-cycle.
    - All new homes must have solar windows & PV's to generate electricity/income and sufficient energy to power EV's. The current restriction of 7kw & 11kw. Cars will essentially become the storage hub for energy if parking allows for energy capture during the day, saving 2-3k a year on energy costs and reducing carbon footprint of transport sector by 80%. This requires integration with real estate developments (offices/retail parking).
- The comment on page 111 is inaccurate; "balancing growth with more sustainable approaches"; it's not "either or" but "and" growth based on sustainable leadership is more economical AND delivers better social growth. Investment in sustainability as an asset class (e.g. Solar) creates not just incremental GDP through the establishment of a sector (c4-6bn a year, or 2.3% increase in national GDP), it allow sees 4-6bn in consumer spend increase which is a further 2-3% increase in GDP, and offsets the likeliehood of being fined 600-650m a year from 2020 by the EU, which would erode national GDP growth by 0.6% directly.