

Ireland 2040 Our Plan – Issues and Choices

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Introduction

This submission discusses some of the issues raised by the NPF *Issues and Choices* paper. The paper is wide-ranging in nature, so I have not attempted to answer more than a small fraction of the questions it poses. I have structured my submission around a series of major issues, but there is no one-to-one correlation between these issues and the consultation questions. However, I have attempted to indicate where a topic relates to one or more specific questions or to a particular section of the document.

Overall issues

Key challenges

Here, I do not refer to any particular portion of the *Issues and Choices* document but will merely summarise my overall views.

I believe that the primary challenge in developing the NPF will be to balance the economic importance of cities (as seen in economic theory and, more practically, with the 2016 census figures) with solutions to the serious problems currently facing many rural areas (including rural towns). In the past, an attempt has been made to address the former factor through the uncontrolled growth of Dublin (while often failing to provide the necessary infrastructure there), whereas lip service has been paid to addressing the latter through a relatively dispersed model of economic development that fails to achieve critical mass, the remaining cracks being papered over by a mixture of long-distance commuting, the “rising tide lifts all boats” factor and migration.

Technological developments, particularly (but not exclusively) in transport and communication, over the lifetime of the NPF will also need to be considered. Although developments such as autonomous vehicles (AVs) could have significant positive impacts, there is also the potential for negative ones; some predictions in other countries suggest that AVs could lead to increased long-distance commuting, potentially leading (in Ireland) to something like a rerun of the trends seen between 1996 and 2011.

ERD versus BRD

Here, again, I do not refer to any particular portion of the *Issues and Choices* document but simply seek to express my support for the concept of “effective regional development” (instead of “balanced regional development” and the assertion that “the same level or even type of growth can’t occur everywhere.” (This is not, of course to say that I endorse the status quo.)

Spatial aspects

Critical mass and the regional cities

Here, I address issues primarily relating to the following questions in *Issues and Choices*:

- Taking on board all of the relevant environmental and physical capacity issues, what role should our cities have as part of the NPF?
- How might we develop one or more strong regional complements to Dublin that can address their whole city-region, including interactions between settlements?

The lack of critical mass in the regional cities is a major problem, and I do not believe that a continuation of the overly diffuse “Atlantic Gateway” approach will solve it. (In this respect, I would urge caution in trying to replicate the “Northern Powerhouse” approach – the North of England has a series of cities of over 1 million population, none of which is more than about 60km straight-line distance from its nearest neighbour, clearly quite a different situation from anywhere in Ireland, although the Dublin–Belfast corridor may be somewhat comparable.)

I would tentatively suggest that Cork should be built up as a stand-alone counterweight to Dublin, along the lines of the present “Cork 2050” or “CASP 2050” project (about which there seems to be very little publicly available information at the moment).

Although I have said that the Northern Powerhouse–type “string of pearls” approach may be limited in its transferability to Ireland, I do believe that there is potential for something along these lines in the Limerick–Galway corridor. In addition to the cities at either end, this corridor contains Ennis – the largest town in the State outside Leinster, as of 2011 – and the Shannon complex, which is simultaneously a town (albeit relatively small) an employment centre and an airport. (Extending this corridor southwards to Cork is less attractive because the towns between Limerick and Cork are much smaller and the airports at either end are on the “wrong” sides of their respective cities; however, even if an extended corridor is unattractive from a planning point of view, I would stress that a major upgrade of the N20 road corridor remains essential.) This does not imply that Ennis or Shannon should necessarily be designated as growth centres at NPF level, although Ennis appears to have a reasonably strong case.

Other potential growth centres

Here, I do not address any specific questions in *Issues and Choices* (though this section relates, to some degree, to the two cited in the previous section) but consider the potential role of growth centres outside the larger cities.

Beyond Cork and Limerick–Galway, Waterford suggests itself as the next obvious candidate for a growth centre, though I would expect it to be considerably more modest in scale. (The precise scale of Waterford’s development will depend in part on whether it is considered appropriate to designate one or two other centres in the South East, such as Wexford or Kilkenny.) Tralee, Sligo and Letterkenny are also logical from the point of view of covering the western seaboard regions remote

from the main cities. There might be a case for Castlebar and/or Cavan on similar grounds, though it has to be acknowledged that they are comparatively small towns.

A centre in the Midlands is almost certainly a necessity; there appears to be a general feeling that the triangular Athlone–Mullingar–Tullamore complex hasn't worked out (not least, perhaps, in the fact that, as of 2011, the largest town in the Midlands was the undesignated Portlaoise). In this context, Athlone and Portlaoise (together or singly) would be the primary contenders; consideration might also be given to Mullingar, though it is relatively close to Dublin.

Finally, the Dublin–Belfast corridor is another key development zone, represented in the NSS by the Gateway at Dundalk/Newry. It seems reasonable to maintain Dundalk as a growth centre, but consideration should also be given to Drogheda, including the Laytown–Bettystown–Mornington area (as a complement to, rather than a replacement for, Dundalk), though it too may suffer from its proximity to Dublin.

I believe the number of growth centres, excluding Dublin, Cork, Limerick, Galway and Waterford, should be somewhere between five and twelve.

The role of rural towns

I believe that the role(s) played by rural towns (i.e. those smaller than the designated growth centres) should be addressed in the NPF, although any identification of specific towns should be left to RSEs or even local authority development plans. More research on the problems and potential of such towns is needed, possibly as an input to guidance for Regional Assemblies or local authorities.

The role of Dublin

Although it is not explicitly addressed by any of the questions in *Issues and Choices* (that said, reference is made at 2.3.3 to “protecting the key role played by Dublin”) attention will need to be given to the future role of Dublin. In particular, I believe that Dublin should be allocated sufficient growth to enable it to compete with overseas cities in appropriate fields (the example most discussed at present is financial services after Brexit, though this is obviously a short-to-medium-term consideration), unless this growth entails severe negative consequences for the rest of the State or, indeed, for Dublin itself. (Of course, if critical mass were to be built up in some other city or combination of cities, that centre might be able to compete for some such investment; however, there is always likely to be a major difference of scale – even with very optimistic growth assumptions, Cork will probably remain below one-third the size of Dublin, on a metropolitan-area basis, throughout the NPF timescale.)

Cross-border aspects

Here, I address the “Ireland in an All-Island Context” section of *Issues and Choices*.

I feel that the NSS gave insufficient attention to cross-border issues and that the Dublin–Belfast corridor in particular has significant potential for further development. Unfortunately, however, Brexit means that it will be very difficult to plan in any meaningful way for border regions or cross-border corridors. We still know very little about what actual border controls will be put in place, and, even once they are in place, I expect it will take several years for new patterns of trade, commuting etc. to become established. Thus, I fear that the Brexit process may set cross-border planning back by a decade or so; the NPF must look at ways of avoiding such an outcome.

Infrastructural issues

Here, I address the “Equipping Ireland for Future Development – Infrastructure” section of *Issues and Choices*.

I feel that the idea of identifying “nationally important infrastructure projects” in the NPF is somewhat at odds with the intention that the NPF should not be a “wish list.” However, I have provided an indicative list of transport projects by region in the table below. (Note that, in general, projects of higher priority are higher on the list, but the correlation is only very approximate). I would also caution that, in practice, some projects might not be completed until after 2040.

Eastern & Midland Region	Southern Region	Northern & Western Region
<ul style="list-style-type: none"> • Metro North/South • DART Expansion Programme (including DART Underground) • Improved north–south road links in Midlands • Bus rapid transit • Luas extensions • Upgrading/ electrification of Dublin–Cork/Limerick rail line • Upgrading/ electrification of Dublin–Belfast rail line 	<ul style="list-style-type: none"> • Dual carriageway/ motorway Limerick–Cork (N20) • Cork Northern Ring Road • Cork east–west rapid transit • Upgrading/electrification of Dublin–Cork/Limerick rail line • Upgraded single/dual carriageway links to Kerry (N21/). –Rosslare (N24/N25) 	<ul style="list-style-type: none"> • Dual carriageway/ motorway to Sligo (N4) • Dual carriageway/motorway to Derry/Letterkenny (N2/A5) • Upgraded single/dual carriageway link to Mayo (N5) • Upgraded single/dual carriageway Tuam–Derry/Letterkenny (N15/N17) • Upgrading/electrification of Dublin–Galway rail line

I have not attempted to prepare similar lists for other types of infrastructure, but there are clear needs in various sectors; broadband is one well-publicised area, and I believe that, assuming the final NPF identifies specific projects, consideration should be given to supporting improved water supply to the Dublin region (which appears likely to be necessary even at very modest levels of growth in Dublin), but only on condition that the scheme can serve any growth centre(s) in the Midlands. It is also likely that there will be significant requirements for water supply, wastewater and flood-control infrastructure involved in any effort to enhance “critical mass” in the regional cities. More generally, there is probably a need to address Ireland’s inadequate levels of infrastructure spending and the tendency to target capital expenditure during downturns (and there

will, clearly, be more than one economic cycle between now and 2040), but it is not clear whether the NPF is the best place to address it.

I would also caution that identification in the NPF should not enable a project to bypass the normal appraisal process completely (as has, in effect, happened in the past with some projects identified as facilitating “balanced regional development”), although weight must clearly be given to such identification when project priorities are being considered. Moreover, I believe that reference should be made in the NPF to pre-existing policy documents such as the *Strategic Framework for Investment in Land Transport*, *National Aviation Policy*, *National Ports Policy* and *Transport Strategy for the Greater Dublin Area 2016–2035*. I also endorse the suggestion (at 4.2.19) of increased land-use/transport integration in areas outside the GDA.

Implementation issues

I will not comment in detail on this area (which relates primarily to the “Enabling the Vision – Implementing the National Planning Framework” section of *Issues and Choices*). However, I note that, as *Issues and Choices* observes (at 7.1.9), “[the] built-up areas or ‘footprint’ of most cities and many towns will straddle local authority or even regional boundaries.” Therefore, there will probably be a need to incentivise cross-boundary cooperation in the implementation of the NPF and to penalise inter-authority rivalry of the kind that gave us, for example, the Ferrybank Shopping Centre. I suggest that funding for the development of designated growth centres should be conditional on the provision of suitable collaborative structures (this does not mean that the authorities concerned would necessarily be forced into boundary changes – though there may be places where such changes are appropriate, in general there are many less dramatic measures that could achieve effective cooperation).