



10th November 2017

National Planning Framework Team,
Custom House
Dublin 1

Re: National Planning Framework

To whom it may concern,

We would like to offer some observations on the NPF document being circulated given its key role in defining Ireland in the next 20 years.

We very much welcome the central thrust of the document that both encourages better regional development in Ireland and the focus to develop Ireland in line with best practice elsewhere around urban centres allowing for improved quality of life and economic prospects for people living in smaller towns and rural areas.

As recognised in the document, even without the right level of planning, Ireland holds a very strong relative position in the world economy. This convergence with international standards of living etc. has been largely driven (as was appropriate) by the engine of Dublin. However in recent decades a lack of planning has led to many unnecessary problems and now is the time to deploy Ireland's increasing affluence to address them as suggested by the World Bank. We welcome the acknowledgment of those in this document.

The new economic growth and changes to emigration patterns risk once more becoming victims of our success and so it is essential in the words of the plan that we act on its core message that "continuing...according to the status quo and without a coordinated plan is no longer an option".

To address these, in our first submission we strongly recommended building an alternative urban pole involving the four cities of Cork, Limerick, Galway and Waterford. We welcome the echoes of that in the plan.

But we do not believe the plan goes far enough in setting out a path to reverse the bad status quo planning which has given rise to the problems on Page 25.

This is not to suggest removing focus on maintaining Dublin's competitiveness. That is essential. Rather it is to point to a new direction which can both accommodate the population growth and alleviate the pressure on Dublin from Ireland's success while yet achieving the societal objectives of fairness and equality of opportunity across the country.

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The plan adopts the baseline projects of the ESRI. Since its publication in the context of challenges in the health system the ESRI have published details on population projections which show the considerable possible volatility in these numbers. Suggesting that instead of some 600,000 by 2030, Ireland may be home to more than one million people by the same date.

The final version of the plan should include planning in case this greater level of population becomes our reality.

We do not see the capacity of this plan to accommodate this extra growth as perceptions of caps on the growth of the regional cities flow through the document. We believe it is an error and believe that one or more of the cities with the largest potential to absorb very significantly greater population growth and economic activity should be identified and planned for. If not, the status quo position of the last 30 years where that growth has gravitated to Dublin will be repeated were that excess population to materialize.

If as is stated in the case there is a desire (welcome) to rebalance the country, we believe that building for much greater growth would be welcome.

For once, the country has the chance of getting ahead of significant population growth and the problems well identified on Page 25.

As we have stated before, it is possible to put investment into smaller cities so that they for the short term surpass the capital in terms of quality of education, housing, health and public realm. This would help in the identification of those places as desirable options for talent and economic activity if they have enough good connectivity.

You will be well aware of our views that AT LEAST Limerick as a city geographically located in the middle of the four identified cities has tremendous potential to go through such a sea-change if appropriate new ideas and investment were tried out in the city. All of the others would benefit too in the creation of a super-city cluster.

At least four important aspects are missing or under-emphasised in the plan.

- There is no movement towards the further defining of a “super-city” encompassing the four regional cities acting together and what would be required to achieve that in terms of interconnectivity, sharing of services etc. The idea of metropolitan plans is welcome but there should also be a distinct path for the development of a metropolitan plan for the four cities operating together (or at least those on the Atlantic Economic Corridor). This needs to be resourced and legislated for specifically (along with the metropolitan plans) as the current regional assembly areas do not include all four. Providing for individual metropolitan plans while useful to retain healthy competition will not identify the synergies which might be garnered by all four working together and perhaps sharing resources. Such a plan should also analyse what might be done in that new “super-city” to provide services for Dublin based inhabitants (rather than the status quo which is the other way around). The plan should also analyse specifically how the four cities might together grow by closer to 100%-200% or more, and accept that this might not desirably be evenly distributed growth. Not all cities might consider that desirable speed of growth and so should be allowed to grow more slowly. Population growth is not the only indicator of a successful place and indeed may be the opposite if infrastructure does not keep pace.

- The plan does not accept or recognize the idea that services for the capital might be located in one or two key locations outside. The badly conceived decentralization to many locations seems to have left a legacy thinking that real clusters of national level services outside Dublin can no longer ever be completed. This form of development for all of our cities and the country around a central area (i.e., Dublin) (like a central Business District in a larger metropole of 6 million) runs counter to the desirable idea of redistributing growth among interconnected more evenly distributed multi-activity poles – the latter is the way to avoid excessively expensive housing, offices and services. Roads and trains run in both directions. We should strive to more equally distributed services on either end of key rail infrastructure meaning full trains in both directions at peak times and greater justification for additional spend. For example, do all of the existing services need to be in Dublin – liver centre, cancer research to name but two? This is not decentralization as it was tried before to many locations but done well it should mean that for each commuter going to Dublin for a job in the morning and returning home in the evening by train, there is an inhabitant of Dublin going in the opposite direction in the train either for one of those relocated services or for other economic activity. With a growing population, this might not even mean the relocation in the short term of the main activity but the building of surplus capacity for the increasing population in that other super city, at the end of the rail link.

The fact that our population will need very considerable investment in third level places is recognized but in line with ideas in the last paragraph, it is not contemplated nor even recommended that these be located very significantly outside the Dublin metropolitan area in one or other of the super-city component parts. Doing say 75% of those outside or even more would mean all ancillary services, accommodation, entertainment, training, sport etc. would also be located outside and also create a pipeline of talent making those locations even more attractive for industry.

- There is no sense of a recognition of the need for a very serious investment in any of the other regional cities to totally transform the way it operates to reverse the bad planning and development of the last few decades. Without that, cities like Cork and Limerick risk developing the same problems now present in Dublin. We would suggest that there is a real opportunity to trial for example in the short term capacity building of Limerick all of the ideas to be implemented in Dublin to a larger scale. For example, significant up-front investment in public transport so as to totally transform the need for a car based lifestyle. The plan provides for a citywide public transport network and the development of a strategic cycleway. The examples given though suggest a limited level of ambition rather than the development now of the infrastructure which could accommodate IN ADVANCE a city of some 300,000 or more. We now have a chance to show we can develop an Irish modern city capable of absorbing growth levels without the problems. It is not incremental growth of 50% but the designing of a new 500,000 city for say 2080.
- Finally, while interconnectivity between the regional cities is stated as desirable (page 21) although the sections on connectivity give too much precedence to road based travel and not enough to the potential of rail. Equally, there are mixed messages as to whether the next road will connect just Limerick and Cork or Waterford, Cork and Limerick. The two are not the same. At RHH, we have urged serious consideration of the latter as being the really game changing option (with the M20 following not leading). Equally, there are limits as to the speed at which cars can travel and there is way too little emphasis on the role higher speed rail interconnectivity might plan. There is reference to the threat of

additional motorway which might disperse the growth of Cork industry and accommodation along the motorway without recognition that trains typically stop in larger towns and therefore would cluster such spread in a more desirable way. Focus on better and faster rail connectivity to the super-city would facilitate the relocation of services there, encourage more and more people to choose that as a desirable and more cost effective, better quality of life alternative to their existing option – Dublin – and make the ambition of what the plan could be a reality.

The plan by its thrust suggests that government interventions could assist in better regional balance. We agree. But it must be done with sufficient scale. Attracting people to Ireland relative to high quality of life options like some other European cities, is no different in challenge to attracting people to other regional cities. It requires vision, imagination and an appropriate budget. We still do not see this in the plan which is why we revert to the idea of working on one or other of the two less successful cities – Limerick or Waterford to do this. Given recent success of the Mid-West in job creation surpassing the rest of the country and its central location at the centre of the super-city cluster, we believe that in the short term the best value for spend is to be found there. We encourage the bravery required to adopt this selection, while yet not depriving the other cities of resources to keep up in tandem. But one way or the other particular holistic focus is required in one to show the way for the others. Ultimately, this is merely a matter of resources and sequencing. It will however take an extra effort to change mind-sets and so the allocation of resources for culture, public realm, education etc. cannot be done on the basis of status quo population distribution. On page 125 there is a reference to investment “relative to the scale of a region”. This is what has held back regions in the past. It has to be relative at least to the potential scale of a region and forward planning. It is not desirable that Dublin should be playing catch up either but if we intend on releasing pressure on Dublin, the only way with limited resources is to allow at least some regions to plan in advance for their potential, potentially in advance of Dublin. Happily the scale of that is small relative to investment in Dublin anyway.

The plan is right to want “ambitious growth targets” for regional cities. And correctly says it is referring to patterns of development rather than precise numbers. But then it continues by stating some pretty specific numbers. Insofar as it gives targets, we do not believe that the professed and necessary ambition is matched by targets of “at least 50%” until 2040, during a time when the population may be growing nationally by as much as 25% anyway. In that context we are worried that limiting this growth anyway to 60% (Page 47) will continue to push the type of sprawl development and one off housing of which we have seen way too much. There should also be a target specifically for new housing in real urban spaces with public transport or walkability factors and not just have the current 40% be in urban fabric which seems to also include new accommodation in the undesirable type of suburban accommodation surrounding Dublin and our other cities. Where are the targets in line with climate change needs for percentages of people living in car-less living either within walking distance of jobs and amenities or walking distance of rapid mass transit nodes?

The plan makes reference to a theory with which we do not subscribe (although admittedly it seems to be just one reference even if the logic of the plan is otherwise). That one cannot encourage people to move and be happy somewhere else. Specifically it states “Nor can large numbers of people be directed to relocated locations”. (page 32) To the extent that is a matter of “direction” we could agree. What is very important though is that with the right incentives in terms of affordable quality of services (health, amenity, education, housing) people will happily make other choices as will their employers. If not, then the private sector notion of a housing development would be doomed to failure. Those facilities and services are within the gift of the

state. No one wants to be forced to live away from the capital if that is the only place the best ones are located. But equally not everyone wants to live in the capital if there are other options of places with good services. At worst, there is an interim position of living with the services but commuting back to the jobs in the capital. But industry quickly catches up to the talent pool.

The flaw in Ireland's adoption of that logic to date is that as people work somewhere, we then try (ever badly with sprawl) to house them there and then put the services in too so that it is always a second best option to live somewhere else. If hospital waiting lines were shorter somewhere else, better schools located there and the best amenities, the commute to Dublin might be bearable if over 30 mins until industry catches up.

Our vision for Ireland 2040 is predicated on a concentrated effort to remove the Capital Dublin bias in those areas within the gift of the state.

We believe that if the state is serious about reversing the very problems well identified on page 25 of the document then it should seriously invest in the solutions in other locations. We do not believe that the firepower identified on the pages dealing with specific items for the regional cities is adequate. We also believe for the reasons set out above that taking them as four distinct units as opposed to a collectivity is a mistake. After the section on Dublin, the next one should be a section on the new "super-city" (whether three or four can be decided but should then dictate infrastructure, road, rail etc.). Only then should the individual cities be addressed and with more firepower than is set out.

If a city like Limerick could be sure to offer its citizens and proposed citizens among the best quality of education and health in the state, affordable interesting high density housing, best in class quality of life, fair plan and opportunity to all as (relative to Dublin there are a lot fewer vested interests blocking the designing of an exciting new metropole), if disproportionate numbers (relative to existing population distribution) of third level places were granted to UL and rail connectivity improved and road connectivity to Waterford and Cork then the caps on growth set out in the plan of 60% would not only appear ridiculously low but indeed be very dangerous to achieving the potential of the plan.

The plan proposes that Limerick strengthen its position "as the principal focus within the Region". This is not the right level of ambition. It should be strengthening its position in the region but also as a core city in the new cluster and as the one geographically located at its centre. Limerick has not only the potential (stated in the plan) to "generate significant employment and housing growth" but building on its recent turnaround and renaissance but also much underused urban fabric, port facilities, proximate airport etc. to act as a new central engine for that new city cluster. This is not acknowledged here and should be.

Rome was not built in a day but such a new centre (around Limerick-Shannon-Ennis) for a super-city cluster involving Cork, Waterford and Galway would have the same tremendous knock on positive impacts on the others who could then be similarly developed.

Within the next 10-15 years, it might not be possible to recreate four cities and Dublin but it should be desirable and possible to do at least one in a way that moves on the plan's overriding objectives on page 27 without harming any of the others and showing the way for the next version of this plan to achieve the overriding objective 8 on that same page..

We very much welcome having the opportunity to comment on the plan and wish you the best in the production of the next version.

Kind regards,

JOHN A. MORAN
Chief Executive