

Submission to the National Planning Framework

Conor Skehan

Contents

1.	Introduction.....	3
1.1.	Introduction.....	3
1.2.	NPF to address Expert Group Findings.....	4
1.3.	NPF National Purposes.....	5
1.3.1.	Sustaining and increase existing patterns of national success.....	5
1.3.2.	Contributing to further economic, social and environmental betterment of Ireland..	5
1.3.3.	Avoiding policies that are based on contrary evidence or assumptions	5
1.3.4.	Addressing and acknowledging existing and evident national trends.....	5
1.3.5.	Integrating the widest range of national sectoral, social and spatial factors	5
1.3.6.	Ensuring practical and attainable implementation.....	5
2.	Criteria for a Successful NPF	6
2.2	Criteria for Success	7
2.2.1	Has the implementation of the NPF been tested under a range of Scenarios?	7
2.2.2	Is the NPF Resilient under a wide range of Scenarios?	7
2.2.3	Does NPF integrate and co-ordinate at a National level?	7
2.2.4	Does the NPF promote the welfare of the whole people?	7
2.2.5	Is the economy of East Leinster the Primary Focus of the NPF?	8
3	Fundamental NPF Considerations	9
3.1	Introduction.....	9
3.2	National Spatial Factors	9
3.3	National Strategic Factors	10
4	Issues to be avoided by NPF.....	13
4.1	Avoiding Metamyths.....	13
4.2	Conclusions on the ‘Unbalanced’ Myth.....	15
4.3	The Myth of Sprawl	17
5	Likely National Issues, Choices and Trends that NPF should address.....	20
5.1	Introduction	20
5.2	Choices, Issues and Trends	21
5.2.1	Choice.....	21
5.2.2	Six Issues.....	21
5.2.3	Four Trends	21
5.3	NPF Implementation	22

1. Introduction

1.1. Introduction

As advised by the Expert Review Group, the National Planning Framework [NPF] should have a focus on spatial development issues and choices which are genuinely national in scope and scale. The objective of should be to shape Ireland's spatial development over the next 20/30 years, while recognising that places have different, distinctive but unequal potential. The Group also advised that the NPF should be purposeful, national, spatial and strategic. This submission supports this advice and is intended to contribute to realising these objectives.

This contribution hopes to identify *how* the NPF should be developed – rather than *what* the content should be. The submission addresses 4 issues

2. Criteria for a Successful NPF
3. Fundamental NPF Considerations
4. Issues to be avoided by the NPF
5. Likely National Issues, Choices and Trends that the NPF should address

Based in the findings of the Expert Group Review of the NSS that the NPF should be purposeful, national, spatial and strategic – this submission puts forward six **National Purposes** [see section 1]

Based in the findings of the Expert Group Review of the NSS that the NPF should be a strategy, not a vehicle for promoting planning concepts with little, if any practical significance or become a wish list or shopping list of projects – this submission identifies **Criteria for a Successful NPF** [see section 2]

Based in the findings of the Expert Group Review of the NSS that the NPF should be spatial– this submission identifies **Fundamental NPF Considerations** to capitalise on the specific potential of specific places thus recognising that places have different, distinctive but unequal potential [See section 3]

Based on the findings of the Expert Group Review of the NSS that the NPF should learn from the experiences of the NSS this submission identifies **Issues to be Avoided** by the NPF [See section 4]

Based in the findings of the Expert Group Review of the NSS that the NPF should have a focus on spatial development issues and choices which are genuinely national in scope and scale – this submission includes an overview of **Likely National Issues, Choices and Trends** that the NPF should address [See section 5]

1.2. NPF to address Expert Group Findings

From the outset it will be important to ensure that the NPF demonstrably responds to the lessons learned

The Group strongly agreed with the statements that

- the success of the NSS had been limited and it was “no longer fit for purpose”,
- Ireland’s spatial development needed to “address new and altered realities”

Much of the impetus for making this contribution comes from a reading of the excellent the Views Of Expert Group Report which provided salient advice that needs to be heeded. These are addressed in this submission as follows; -

TOPIC	EXPERT GROUP FINDINGS	Reference in this submission
PROBLEMS	The document was in parts too theoretical and concepts built on it, for example the Atlantic Gateways Corridor and the linked gateways / hubs, lacked sufficient substance and clarity on the implications.	Section 1
	The designation of settlements as hubs lacked justification.	
	In a practical sense, the most significant undermining of the NSS came in December 2003 with the announcement of the decentralization programme.	
	A policy area that worked against the NSS was housing, both urban and rural	
NEW REALITIES	the harsher budgetary regime imposes a new discipline and rigour to addressing Ireland’s spatial development challenges.	Section 2
	The implication of larger and stronger local government units is that the second NSS must be genuinely national in its scope and content and not usurp policies and decisions which are more properly for the new councils.	
	Transport connections in Ireland have improved significantly since the first NSS was drawn up,	
RECOMMENDED APPROACH	Be purposeful, avoiding self-evident generalizations on the one hand, or direction which restricts unnecessarily the scope for local initiative and action, on the other.	Section 3
	Be national in scope; it is not a local plan for Ireland drawn up by the Government.	
	Be spatial, highlighting and seeking to capitalise on the potential of places.	
	Be a strategy, not a vehicle for promoting planning concepts with little, if any practical significance or become a wish list or shopping list of projects.	
OBJECTIVES	The objective of the NSS is to shape Ireland’s spatial development; it must recognise that places have different, distinctive but unequal potential; and the necessary sharp focus on priorities will involve hard choices.	Section 5
	Shape Ireland’s territorial development over the next 20/30 years	
WHAT TO AVOID	Not be a statement of bland and unobjectionable aims and objectives.	Section 4
	Not BE a statement of land use planning policy, nor is it a compendium of policies	
	Not be so prescriptive that it cannot react to or accommodate new opportunities or changed circumstances	
	Not be so generalised or so flexible that it does not provide the direction and stability to guide key investment and policy decisions	
WHAT TO INCLUDE	Be a short statement, very much on the “less is more” principle, rather than a treatise on spatial development	Section 5
	Have a focus on spatial development issues and choices which are genuinely national in scope and scale.	

1.3. NPF National Purposes

This contribution seeks to ensure that an optimal framework emerges that will serve the following National Purposes; -

- **Sustaining** and increase existing patterns of national success
- **Contributing** to further economic, social and environmental betterment of Ireland
- **Avoiding** policies that are based on contrary evidence or assumptions
- **Addressing** and acknowledge existing and evident national trends
- **Integrating** the widest range of national sectoral, social and spatial factors
- **Ensuring** practical and attainable implementation

1.3.1.Sustaining and increase existing patterns of national success

Ireland is a remarkably successful small nation that is regularly ranked among the upper tier of achievements in characteristics such as wealth, well-being, happiness, equity and environmental quality. The continuous efforts to improve these things means that it easy to overlook or be complacent about these hard-won successes. A successful NPF will identify the key characteristics that favourably affect such success – enhancing contributions and avoiding any threats to continued success.

1.3.2.Contributing to further economic, social and environmental betterment of Ireland

All plan-making must deal with a wide range of competing demands, scarce resources and unavoidable evidence. In good plan-making the resolution of emerging compromises and trade-offs must be guided by explicit, visible and evidence-based criteria. The most important such criterion is a system of cost-benefit assessment

1.3.3.Avoiding policies that are based on contrary evidence or assumptions

The NPF will require approval of both Houses of the Oireachtas – and will be binding for many lower tiers plans, policies and decisions. For this reason, it will be important that the utmost care be exercised to ensure that it is based upon unassailable evidence and that unquestioned assumptions and partial evidence or avoided. This will be critical during the setting of objectives, the selection of decision-making criteria and in the consideration of alternatives.

1.3.4.Addressing and acknowledging existing and evident national trends

Since the introduction of the Planning Acts Ireland has exhibited a strong pattern promoting ideologically based planning paradigms – often clinging to concepts that had been long abandoned elsewhere. It has been noted by the review of the NSS and the concepts built on it was ‘too theoretical’. This points to the need to ensure that the NPF, from the outset, is strongly based on evidence of actual needs and not theoretical preferences.

1.3.5.Integrating the widest range of national sectoral, social and spatial factors

Ireland is currently subject to a very large number of poorly co-ordinated or integrated sectoral plans - especially at the local level. These range from agriculture and industry through education, health, justice and social services, to transportation, tourism and energy. Existing governance structures that are excessively centralised gives rise to and reinforces the ‘silo mentality’ that gives rise to this poor co-ordination. This is a major cause of unattained potential – especially in rural and peripheral areas that are highly dependent on government interventions. The NPF will succeed to the extent that it provides an inclusive framework that can accommodate, integrate and mediate to bring these many plans together to give rise to improved outcomes at the point of delivery.

1.3.6.Ensuring practical and attainable implementation

Ireland is a rapidly urbanising nation. An unprecedented scale and concentration of population and associated infrastructure that will create implementation challenges for this next phase of national development. It will be critical to ensure that the NPF includes provision to deliver its objectives.

2. Criteria for a Successful NPF

2.1 What will Success look like in 2040?

From the outset, it is important to define what will constitute ‘success’ for the NPF. In this context, it is very important to articulate the reality that a small open economy has relatively little capacity to ‘shape’ its future. For this reason, success as defined by a prescriptive ‘blue-print’ approach must be viewed as an inappropriate strategy that will fail.

Success will not be measured by the extent to which the NPF will have ‘shaped’ Ireland by 2040. Instead success will need to be primarily measured by the extent to which Ireland will be able to adapt to, and capitalise upon, a wide and ever-changing series of opportunities that will occur. The second measure of success will be the extent to which the resultant benefits are shared equitably – so that the whole nation prospers. The final measure is that the success should be sustainable – so that following generations will have equal opportunities to prosper and be happy.

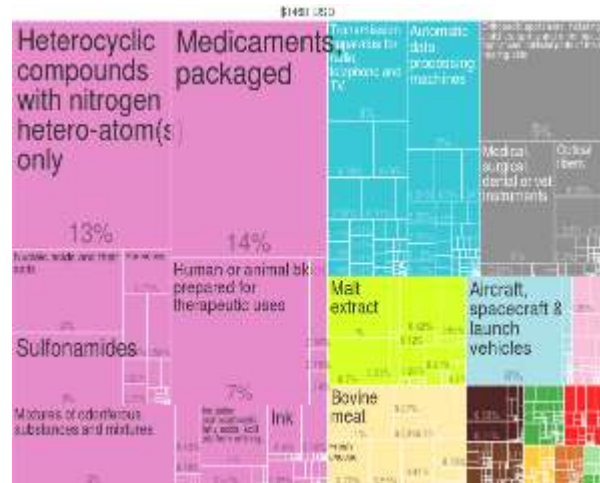


Fig 1. Ireland Export Treemap by Product (2014) from Harvard Atlas of Economic Complexity

Attaining prosperity lies at the heart of any national planning strategies. Economic success is a vital pre-requisite for wealth re-distribution in a compassionate social democracy– especially to assist deprived groups and under-performing regions. In Ireland’s case, it is very important to acknowledge and accept that the source of our success has been a strategy of being an open economy that specialises in attracting and sustaining foreign direct investment. As a small open economy, this specialisation in international trade, means that external change will have very large and unpredictable effects on future scenarios. A successful NPF will need to be flexible, responsive and free from self-imposed constraints.

Subsidiarity is as fundamental principle of governance as it is of planning. The NPF needs to be a document that serves, rather than shapes national economic policy. A successful NPF will be framed to accommodate Ireland’s existing economic policy – unless directed by government that a new one is to be followed.

Indigenous Enterprise is often proposed to allow Ireland to be more ‘independent’ of the outside world, by having less reliance on foreign investment. Such arguments are often based on a misunderstanding of the actual sources of our national prosperity. The country is one of the largest exporters of pharmaceuticals, medical devices, ICT and software-related goods and services in the world. The agri-food and drink sector – which represent the source of aspirations for greater national enterprise - account for less than 10% of our exports [see chart] and for many years the contributions of the primary sector has been falling – both in terms of value and employment. A successful NPF will give priority to supporting the sources of the majority of the national economy – to facilitate the revenues necessary to sustain less viable activities.

‘Planning versus Market-led Development’ is a false dichotomy proposed many who promote prescriptive ‘blueprint’ planning approaches. This is false because it fails to acknowledge that ‘Market’ represents the need of enterprise for adjacent markets and workforces as well as the choice of where and how that workforce wants to live. Arguments that accommodating this reality as merely serving to ‘confirm and support market trends’ ignore both the power of integral demographic trends and the realities of international trade. A successful NPF will serve and be responsive to the emerging needs and choices of Ireland’s society and economy.

2.2 Criteria for Success

For these reasons the NPF should be examined to determine conformity with these following criteria for success; -

2.2.1 Has the implementation of the NPF been tested under a range of Scenarios?

The NPF will need to provide a resilient and effective implementation programme. It will need to address how to integrate the management and development of activities and players within and between parts of Ireland. Implementation planning is likely to identify significant challenges for integration in some of the more divergent scenarios that may emerge in more devolved administrative systems.

The NPF has the potential to help to shape Ireland's territorial development over the next 20/30 years. To achieve this the NPF needs to be spatial to capitalise on the potential of places while recognising that places have different, distinctive but unequal potential.

This means that at a fundamental level the NPF needs to acknowledge, accept and accommodate the fact that different parts of Ireland have different characteristics, different potential and different futures. One size national policies will not fit all.

2.2.2 Is the NPF Resilient under a wide range of Scenarios?

As a statutory instrument, the NPF must include provisions to adapt to a wide range of changing external drivers - using a process of regular monitoring, review and revision. The strategy should be reviewed and adjusted at 7 year intervals to determine which scenario is emerging. This will ensure that major investment decisions remain valid under all reasonably foreseeable scenarios – a characteristic known as 'Plan Resilience'.

2.2.3 Does NPF integrate and co-ordinate at a National level?

As a Framework the NPF should concentrate identifying and prioritising issues at on national level to facilitate effective co-ordination and integration at regional and local levels. This will provide frameworks – resilient under a wide range of scenarios - to co-ordinate responses to the emergence of different national futures under a wide range of possible scenarios. Accordingly, for each scenario, the NPF should concentrate on identifying and prioritising-

- the location, hierarchy and integration needed for likely national economic roles and activities
- the likely national patterns of use, settlement resulting from economic, social and policy drivers
- the location, significance and hierarchy of existing environmental sensitivities to be used.
- The key monitoring indicators to be used to identify such emerging scenarios and responses
- The critical national infrastructure interventions required for each

2.2.4 Does the NPF promote the welfare of the whole people?

Article 45 (1) of the Constitution includes the provision that the State shall strive to promote the welfare of the whole people.

It is a matter of fact that the majority of the population of the State [and of Northern Ireland too] are located in the eastern part of the island.

The 2016 Census indicates that Leinster contains over half of the State's population. [54.6 per cent, or 2,504,814 people]. Furthermore, all projections expect this to remain the fastest growing and youngest part of the State for the foreseeable future.

This area is also the location of the majority of national GDP – both in absolute terms and in terms of either income per capita [which is twice the national average] and actual income per capita.

The NPF must accord attention to the needs of the population of this region in proportion its national share of population.

2.2.5 Is the economy of East Leinster the Primary Focus of the NPF?

The east Leinster region is, by a considerable distance, the nation's principle source of income and taxation. The welfare of the rest of Ireland – especially less advantaged areas – is critically dependent on the continued success of this region.

Equity and practicality point to the need for the NPF to give priority to ensuring the continued success of the location where the majority of the economy and population are located – especially because this is where the majority of future population and economic activity are projected to be in the future.

This area provides Ireland with its international competitive. However, this cannot be taken for granted, especially in a volatile world. The region has been significantly under-resourced – relative to its population and economic contribution. Significant investment in infrastructure will be required in this region to maintain Ireland's productivity and associated international competitiveness.

3 Fundamental NPF Considerations

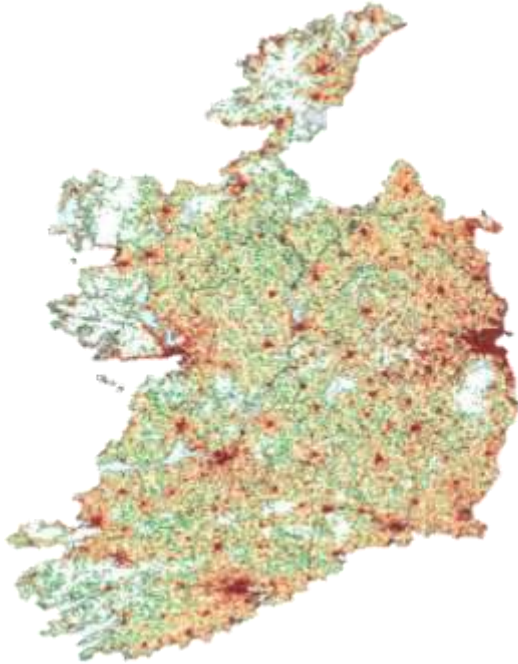


Fig 2. Population Density Pattern

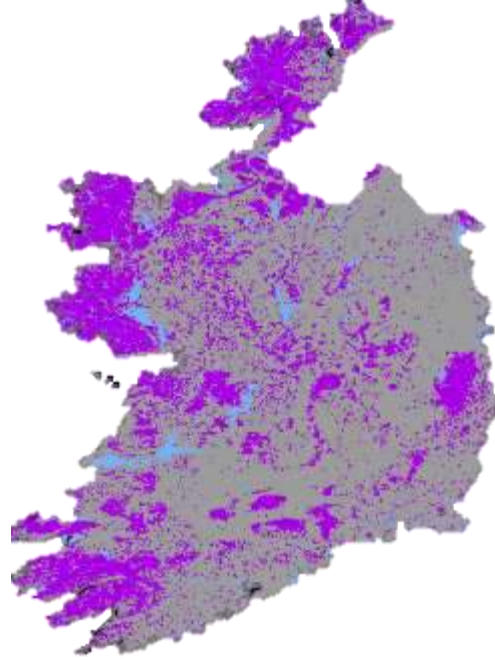


Fig 3. Environmental Factors that Limit Development

3.1 Introduction

Based in the findings of the Expert Group Review of the NSS that the NPF should be purposeful, national, spatial, and strategic – this submission identifies Fundamental NPF Considerations to capitalise on the specific potential of specific places thus recognising that places have different, distinctive but unequal potential [See section 3]

3.2 National Spatial Factors

Ireland has a two very distinctive set spatial drivers for planning [See maps above]. The first is that the distribution of settlement is overwhelming located in the eastern part of the country. The second is that intrinsic geographic conditions giving rise to environmental factors that limit development are overwhelming located in the western part of the country. The effects of both of these factors will intensify in the future – population will increasingly concentrate in the east and environmental protection legislation will increasingly inhibit development in the west. These two factors give rise to the fundamental spatial factors determining the future patterns of development in Ireland. They will give rise to the different and distinctive patterns of more intensive development in the east and more extensive growth¹ in the west.

The future of each of these different parts of Ireland needs to be evaluated under each of the likely scenarios to determine whether and how each section of the NPF will perform under criteria, such as the following; -

¹ 'Extensive Growth' is a term used by economists to describe subsidized growth. This can increase population or growth – but subject to the laws of diminishing returns and as such has to be used with great care and focus because over-reliance exhausts resources.

- Is this proposal nationally and strategically significant?
- Is this proposal linked to existing or emerging spatially specific issues
- Will this proposal make this area more or less productive and prosperous than it is at present?
- Will this proposal increase or diminish natural processes in this area?
- Is there evidence of a proportionate need for this proposal in this area?
- Is there evidence for the proportionate benefits of this proposal in this area?
- Is there evidence for the priority of this proposal in a national context?

3.3 National Strategic Factors

The Expert Group Review of the NSS advised that the NPF be confined to nationally significant, strategic actions that integrate into a coherent, evidence-based vision to achieve the potential of each area. Recognising that different parts of Ireland have distinctive and different potential is a fundamental consideration of the NPF.

Demographics, geography, external events, changing agriculture and governance confer these differences – which have little capacity to be shaped by policy or planning.

From this it follows that a fundamental strategic consideration is to understand and accept the difference between external and intrinsic drivers – which must be accommodated and served to best advantage – and matters that have a scope for self-determination and direction – which can be planned and managed to achieve agreed outcomes.

The principle drivers of Ireland’s future, in order of significance; -

	Driver	Control	Likely NPF Influence?
1	Demographics	Fertility, Migration & Economic Opportunity	Weak, Very Weak
2	Geography	Geology, Hydrogeology, Soils, Vegetation, Topography	None
3	External Events	Global economic, political and social events EU and US Policy	None
4	Changing Agriculture	Modernisation of Agriculture Reform of the Common Agricultural Policy	Very Weak None
5	Governance	Centralisation or Devolution of Functions	Very Weak

Fig 4 NPF Influence on Principle Drivers of Development and Change

Within these drivers, as set out later in this submission, the only principle drivers of settlement in Ireland that has scope for self-determination and direction is Centralised Governance.

Most of the major drivers are not readily susceptible to control – or ‘shaping’ by the NPF so it is important that to ensure that the Framework is seen as a document that principally aims to facilitate and serve forces that will occur regardless of preference, policy or plan

This means that the fundamental considerations of the NPF need to be; -

- Serving the Potential and Needs of different areas
- Integrating Actors & Plans
- Being Flexibility and Resilient

3.3.1 *Serving the Potential and Needs of Different Areas*

The NPF will need to provide a framework that identifies and gives national priorities to areas in accordance with the intrinsic potential of each area. 'Potential' arises out of a combination of enabling opportunities and constraining limitations.

At a national level, Ireland exhibits a strong spatial pattern of different potential that arises from the combination of intrinsic and unchangeable natural characteristics.

In general terms, Ireland west of a line from Derry to Cork has a significantly greater concentration of natural factors that limit the development of agriculture, enterprise, and settlement. This means that areas in these west areas are each likely to have a more limited range of opportunities while eastern areas have a wider range.

The development of western areas therefore needs to be based and prioritised on characteristics and activities that are unique or distinctive to each area. These tend to be smaller and to have lower needs for adjoining concentrations of population or infrastructure.

Developments in eastern areas – which have potential for wide range of use opportunities – should be prioritised for those that are larger and which tend to have greater needs for adjoining concentrations of population or infrastructure.

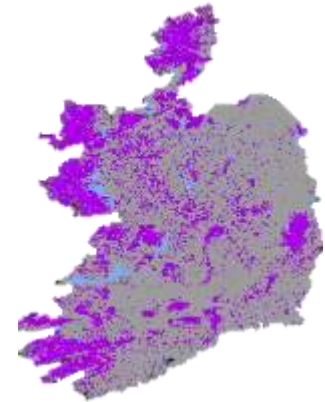


Fig. 5 Environmental Factors that Limit Development – these include uplands, bogs, and sensitive habitats

3.3.2 *Integrating Actors & Plans*

Needs to integrate other actors and plans

The NPF will need to provide a framework that integrates national actions and plans into a coherent, evidence-based vision to achieve the potential of each area. Currently there are separate national development plans for enterprise, agriculture, tourism, water, waste, electricity, marine, transportation and health.

The Framework needs to provide spatial co-ordination for these plans as well as an integrated implementation strategy.

This process will involve a structured series of iterations of each component plan – based on the shared results of monitoring and emerging needs and trends.

Needs to integrate and co-ordinate National & Regional levels

As a Framework the NPF should concentrate identifying and prioritising issues at on national and regional level to facility effective co-ordination and integration at local level. This will provide frameworks – resilient under a wide range of scenarios - to co-ordinate responses to the emergence of different national futures under a wide range of possible scenarios. Accordingly, for each scenario, the NPF should concentrate on identifying and prioritising-

- the location, hierarchy and integration needed for likely regional economic roles and activities
- the likely patterns of use, settlement resulting from economic, social and policy drivers
- the location, significance and hierarchy of existing environmental sensitivities to be used.
- The key monitoring indicators to be used to identify such emerging scenarios and responses
- The critical national and regional infrastructure interventions required for each

3.3.3 *Being Flexible and Resilient*

The NPF will need to be flexible and resilient under a wide range of scenarios.

Flexibility needed for a Small Open Economy in a Volatile World

As a small open economy that is overwhelmingly dependent of international trade, external change will have very large and unpredictable effects on future scenarios. As a statutory instrument, the NPF must include provisions for flexibility to adapt to a wide range of changing external drivers - using a process of regular monitoring, review and revision.

The NPF should be Resilient

The strategy should be reviewed and adjusted at 7 year intervals to determine which scenario is emerging. This will ensure that major investment decisions remain valid under all reasonably foreseeable scenarios – a characteristic known as ‘Plan Resilience’.

NPF needs to consider Implementation under a range of Scenarios

The NPF will need to provide a resilient and effective implementation programme. It will need to address how to integrate the management and development of activities and players within and between parts of Ireland. Implementation planning is likely to identify significant challenges for integration in some of the more divergent scenarios that may emerge in more devolved administrative systems.

4 Issues to be avoided by NPF

4.1 Avoiding Metamyths

The need for evidence-based planning is acknowledged by all. Given this critical significance it is important to identify and scrutinise some of the qualitative underpinning narratives that recur in the case-making of the need for the NPF and its likely benefits. This submission draws attention to two frequently cited issues that occur in almost all analysis and show that they have so little basis in fact, that they can be classified as ‘myth’. These are so pervasive, so unquestioned and so fundamental that for the purpose of this contribution they are describes as ‘Metamyths’

Two sets of myths lie at the heart of the discussion around the NPF. These need to be examined to understand the actual causes of the resultant patterns of settlement and economic opportunity in Ireland. They can be characterised as two ‘metamyths’ that contain a series of subsidiary myths.

Metamyth 1 – Ireland’s exhibits ‘unbalanced’ development because of excess development in the east

Metamyth 2 – Dublin is a failed, sprawling, over-developed city that needs to be contained.

4.2 The ‘Unbalanced’ Myth

Much of the assessment that underpins the needs for the NPF centres on statements about the existence of ‘unbalanced’ regional development in Ireland.

These assumptions need to be examined and challenged. It is important to recognise that the pattern of settlement and economic activity in Ireland are symptoms and not causes.

The fundamental cause of the spatial patterns of population growth are age and fertility - which are intrinsic and unlikely to be responsive to policy or planning measures. The secondary [much smaller] demographic driver – migration [both internal and inward] – responds to economic opportunities.

Beyond demographic drivers there are FOUR ‘deeper’ fundamental drivers that give rise to the persistence of the continued growth and dominance of eastern Ireland. Centralised governance, the Primate City, Modernisation of Agriculture and Urbanisation are the ultimate drivers of the observed settlement patterns. These needs to be acknowledged and addressed as a prerequisite if the NPF wishes to address the question of ‘balance’.

Centralised Governance

Ireland is noted² as having one of the most centralised systems of government in the EU. This is characterised by having very low levels of fiscal or functional autonomy at a local level³. This reduces the opportunities for the development of regionally specific policies, plans or implementation.

The adverse effects of over-centralisation have little effect in the more urbanised eastern region. The effects are most significantly evident in peripheral, rural and disadvantaged areas that are the most highly dependent on government interventions. The adverse effects of many un-coordinated, inflexible, bureaucratic, generalised plans and schemes often fall most heavily on some of the most vulnerable rural communities. Significant devolution of functions from central to local government is a pre-requisite to address these actual causes of rural decline

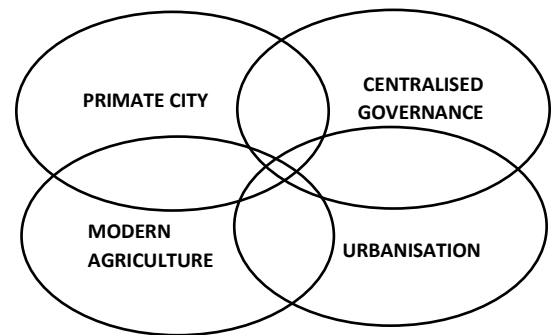


Fig. 6. Fundamental Drivers of Irish Development Patterns

² A 2008 Council of Europe report on Ireland’s found that, despite many reports and promises of reform, Ireland continued to have “excessively centralised” government by international standards.

³ The average public expenditure by Local Government in the EU 15 is 46% - compared to Ireland’s 5%

Primate City

Dublin and its hinterland has become Ireland's Primate City⁴. Population growth occurring predominantly in the Mid-East and Dublin is a long-standing feature of the pattern of settlement across the country. This is a normal and widely-occurring⁵ pattern of urban development - similar to what occurs in countries across the EU, such as France, Austria and Hungary- which also have traditions of highly centralised systems of governance. This has emerged relatively late in Ireland because of a slow transition away from an agricultural economy.

Describing this internationally normal and widespread pattern as constituting unique to Ireland or as an abnormal or problematic 'over-development' of one area over others is misleading and unhelpful. Primate Cities do indeed experience challenges of housing and transportation – but they also confer disproportionate economic benefits⁶.

As noted above the emergence of a Primate is universally a symptom of excessive centralisation and not a cause of rural decline. This directly contradicts the common trope that 'Dublin is robbing rural areas of population and development'.

The other universal driver of change in Ireland are to twin forces of Modernising Agriculture and Urbanisation. These are discussed in more detail below to draw attention to the significance of their roles as ultimate and intrinsic drivers that have little scope to be 'shaped' by the NPF because they are caused by macro-economic and universal demographic and social trends.

⁴ A primate city is the largest city in its country or region, disproportionately larger than any others in the urban hierarchy. [Goodall, B. (1987) *The Penguin Dictionary of Human Geography*. London: Penguin.]

⁵ Paris, Budapest, Dublin, Kuala Lumpur, Lima, Mexico City, Seoul, and Vienna have also been described as primate cities within their respective countries.[Pacione, Michael (2005). *Urban Geography: A Global Perspective* (2nd ed.). Abingdon: Routledge. p. 83.]

⁶ There is a substantial body of authoritative literature indicating that urban agglomerations increase productivity, reduce public capital spending requirements. It also increases occurrences and viability of service, skill and knowledge-based economic activity. See Audretsch D., (1998) "Agglomeration and the Location of Innovative Activity", *Oxford Review of Economic Policy*. Vol. 14(2), pp. 18-29., Brühlhart, M., and F. Sbergami, (2009) "Agglomeration and growth: Cross-country evidence", *Journal of Urban Economics*, Vol. 65(1), pp. 48–63. Ciccone, A., and R. Hall (1996) "Productivity and the Density of Economic Activity", *American Economic Review*, Vol. 86(1), pp. 54-70.

Modernisation of Agriculture

At the foundation of the State over 60% of the population lived in rural areas and were involved in agriculture. Now less than 30% live in rural areas Irish agriculture has changed dramatically since accession and less than 4% work in the sector.

Fewer farmers are producing more food than ever before. However, farming is making an increasingly small contribution to the overall economy.

This has led to significant changes in patterns of settlement as workers move from agricultural areas with fewer jobs into urban areas that have more economic opportunities.

This movement of populations from rural to urban areas is a world-wide phenomenon – that began in Europe in the mid-nineteenth century – where it is known as ‘*Landflucht*’. In almost all countries this process of changing agriculture is described as ‘rural decline’ – with rural communities commonly ‘blaming’ urban areas for the results of changing agriculture.

Urbanisation

Ireland has urbanised late by European standards. Over 75% of most northern European countries were urbanised by 1900 – Ireland in contrast still had over 60% of the population living in rural areas at the foundation of the State.

63% of the Irish Population are now urbanised and the UN Population division project this to increase to the EU average of 75% by 2050.

This is occurring throughout Ireland – demonstrating that much of the concerns about rural population decline is a local effect resulting from the transition away from an agricultural and towards an enterprise-based urban economy. The map on the right illustrates that rural workforces based on urban centres is a nation-wide phenomenon.

4.2 Conclusions on the ‘Unbalanced’ Myth

It is undoubtedly the case that there are marked differences between the patterns of growth in the east and west of Ireland – and the associated economic fortunes of each respective area.

This pattern results from a combination of causes – led by a centralised system of governance that has caused the emergence of the Dublin Region as a ‘Primate City’. This trend has been repeated throughout the state by a process of rapid urbanisation that results from the modernisation of agriculture.

The two principle drivers of the patterns of settlement in Ireland are

1. Centralised Governance
2. Modernisation of Agriculture

The Objectives of the NPF need to be clearly aligned to ensure that

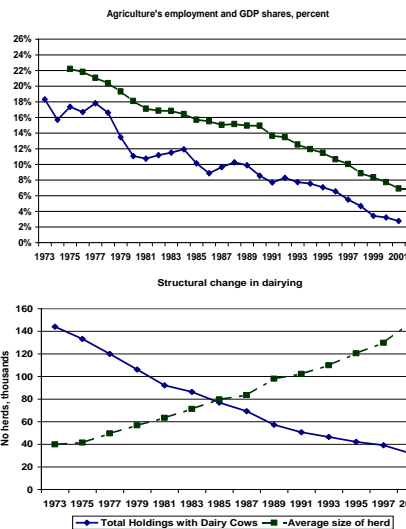


Fig. 7 Change and contraction of Irish Agriculture Source: Structure and Performance Trends in Irish Agriculture, 2003 Alan Matthews

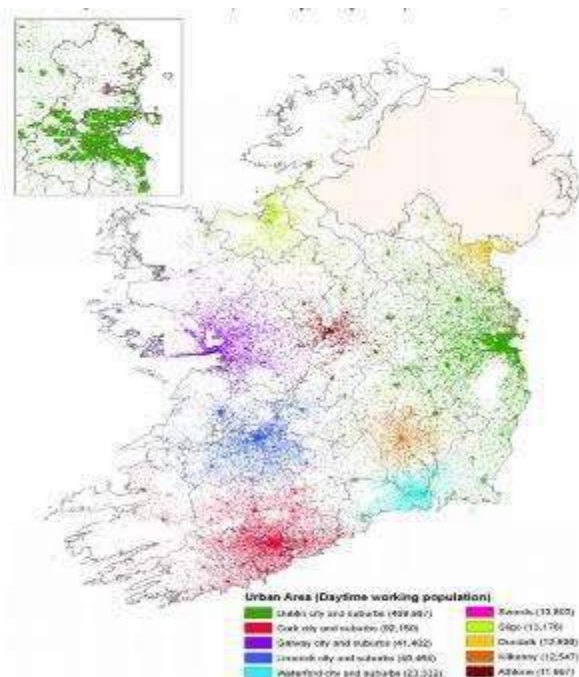


Fig 8 Emerging Patterns of Principle Urban Centres and associate workforce catchments. Source, CSO 2012

Either;

There is an explicit acceptance that the status quo of these primary drivers is accepted as a 'given' under a 'do nothing' scenario.

Or

The NPF is widened to examine issues relating to Governance and Agriculture – which are the primary drivers of change.

4.3 The Myth of Sprawl

Two phrases that are widely used about current development patterns are ‘Overdevelopment’ and ‘Sprawl’. These myths are then linked to claims that Dublin is a ‘low density city’ and that there is a consequent ‘over-dependence’ on private transport. This section below will show that all of these statements are un-true. They are, in fact, myths. It is a myth that these are problems – or that they are unique to Ireland. Ireland and the Greater Dublin are usually compared unfavourably with other similarly sized northern European cities – such as Copenhagen and Amsterdam – as well as patterns of mobility in other Nordic countries. These comparisons need to be examined and to be shown to be myths.

4.3.1 Myth 1 – Dublin is a low density City

The table below – taken from a 2015 article⁷ that vividly demonstrates that, by comparison, Dublin and Amsterdam’s city areas are comparable in the central areas and that Dublin is significantly denser in the larger urban continuum area. The City Region areas are not directly comparable because Dublin’s 6,986 km² [The Regional area is based on counties whereas Amsterdam’s 2,580km² area is based on a planned transportation catchment.]

Core city centre area	Population	Area km ²	Density /km ²	Urban only?
Dublin city centre	116,035	12.63	9,185	Yes
Amsterdam inner canals	81,000	8	10,125	Yes
City boundary area	Population	Area km ²	Density /km ²	Urban only?
Dublin city	527,612	115	4,588	Yes
Amsterdam city	826,659	166	4,908	Yes
Urban continuum area	Population	Area km ²	Density /km ²	Urban only?
Dublin urban	1,110,627	317	3,498	Mostly
Amsterdam urban	1,134,672	446	2,546	Mostly
City region area	Population	Area km ²	Density /km ²	Urban only?
Greater Dublin Area	1,801,040	6,986	257	No
Amsterdam metro region	2,332,773	2,580	904	Not confirmed

Table by IrishCycle.com

Fig 9 Comparison of demonstrates that Dublin and Amsterdam have comparable Urban Density

⁷ <http://irishcycle.com/2015/11/03/is-dublin-a-low-density-city>

4.3.2 Myth 2 Dublin is an ‘Overdeveloped’ and ‘Sprawling’ City

Populist and media discussions about the density and extent of Dublin are ill-served by the unquestioned and unchallenged repetition of phrases such as ‘Dublin has the footprint of Paris with 10% of the population’. This is patently un-true and absurd – as shown in the attached image.

Of more relevance, are frequently touted arguments – even among planning professionals – that Dublin is somehow ‘sprawling compared cities like Copenhagen’ – which are regarded as paragons of good urban planning. The illustrations below show that the two areas have almost identical populations, spatial footprints and general configurations.



Fig 10 Urban Footprint Paris pop 12.3 million



Fig 11 Comparison showing Similarity of Metropolitan Urban Foot Print of Dublin 1.9 million and Copenhagen 2.0 million – both are 25km x 15km

4.3.3 Myth 3 – The Myth of Unsustainable Patterns of Car Usage

Excessive car-ownership and an over-reliance on private cars are commonly cited systems of congestion and of a failed transportation system in the eastern region. This is used as a fundamental argument for the need to control or limit the growth of the region. It is a fact that all metropolitan areas experience pressure on housing and transportation. These factors are not unique to Ireland and certainly do not constitute a useful critique of the region – nor a rationale to divert growth from the region.

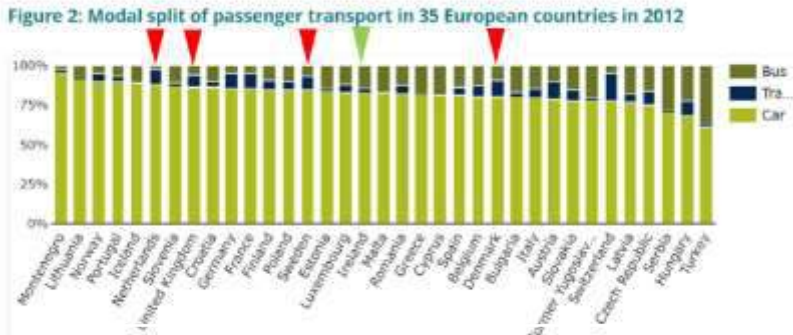


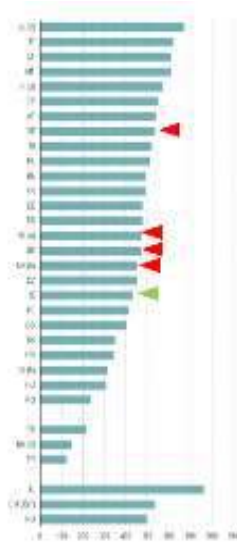
Fig 12 Comparison of Modal Spilt in Ireland [green] and other EU states

An objective examination of the facts behind this issue reveal that Ireland ranks surprisingly well in terms of use of public transport in preference to car use – better than Sweden, France, Germany, the Netherlands and the UK – for example.

It also appears that Irish Car ownership levels are lower than those of comparison countries such as Denmark, the Netherlands, the UK and Sweden

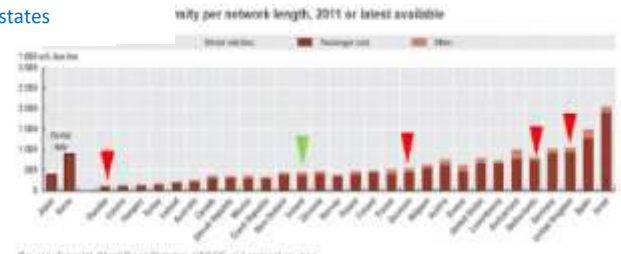
Irish Road Traffic Intensity – whether measured by network length or as a contribution to GDP are all favourably comparable to EU comparator countries.

These data clearly demonstrate that by comparison to EU norms Ireland has no ‘excessive car-ownership and an over-reliance on private cars’.



Cars/1,000 people

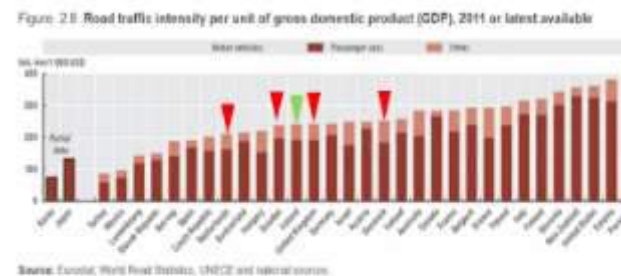
Fig 13 Comparison of Car ownership in Ireland [green] and other EU States



Source: Eurostat, World Road Statistics, UNICE and national sources



Source: Eurostat, International Transport Forum, World Road Statistics, North American Transportation Statistics, UNICE and national sources



Source: Eurostat, World Road Statistics, UNICE and national sources

Fig 14 Comparison of Road Traffic Intensity in Ireland [Green] and other EU States

5 Likely National Issues, Choices and Trends that NPF should address

5.1 Introduction

The Expert Group recommended that the NPF should have a focus on spatial development issues and choices which are genuinely national in scope and scale.

This section sets out what these issues and choices are – identifying which are likely to be relevant of susceptible to influence by the NPF.

In Figures 15 and 16 these matters are illustrated spatially and schematically, on a national canvas to illustrate how to deliver the Expert Groups recommendation of producing a short statement, very much on the “less is more” principle, rather than a treatise on spatial development’. They simply demonstrate that patterns of likely future development patterns are readily predictable and that these will give rise to new administrative needs. The following pages amplify on these points.

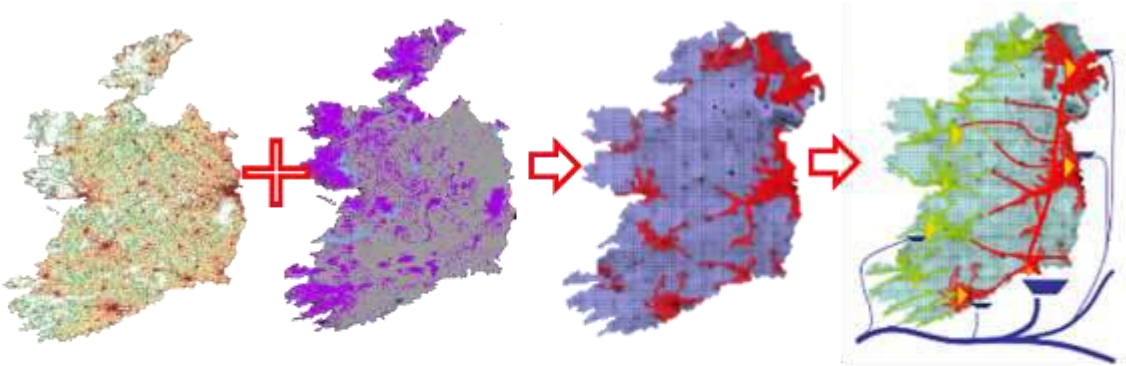


Fig 15 Likely Future Development Patterns

The NPF will need to facilitate an emerging pattern of development. This results from a combination of existing and emerging demographic patterns combined with intrinsic environmental Condition will lead to two different and distinctively different eastern and western corridors of population growth and associated infrastructure need.



Fig 16 Likely Future Administration Needs

The NPF implementation will need to be based on distinctive and different emerging urban-based regional catchments – some based on counties and others on regions. Facilitating emerging patterns of urbanisation is the key to the future viability and prosperity of the majority of associated rural hinterlands.

5.2 Choices, Issues and Trends

5.2.1 Choice

It is something of a misnomer to describe Ireland's future development patterns as a 'choice' – as identified earlier many of the most significant drivers are matters that are not subject to policy control – much less choice. It is important that to ensure that the Framework is seen as a document to facilitate and serve forces that will occur regardless of preference, policy or plan

5.2.2 Six Issues

The preceding observations have established that Ireland's future success will depend on facilitating existing successful models while striving to increase opportunities to re-structure rural areas and settlements to accommodate the results of modernizing agriculture.

The NPF will need to put in place 6 Integrating Strategies and priorities to ensure that governmental interventions – by departments and sectors effectively address the following issues

1. Co-ordination of Rural Transition Strategies for areas of agricultural contraction and intensification
2. Preparation of Integrated Management Plans for the protection of Environmental Assets in the context of sustaining enterprises and communities
3. Preparation of Integrating Plans for the Atlantic and Belfast- Waterford Corridors
4. Preparation of Integrating Plans for the 3 Midland Regions
5. Integrated Transportation & Infrastructure Provision within Urban Regions
6. A Strategy to integrate the Greater Dublin Area with other regional economies

5.2.3 Four Trends

The demographic and economic trends identified earlier in this submission will lead to four likely patterns of settlement and activity. These arise from a set of drivers that lie outside the influence of the NPF – though there may be scope to enhance the outcomes. While these trends will undoubtedly continue – the detail of sequence, types and local configuration cannot be readily predicted. A successful NPF will examine scenarios to successfully accommodate these trends under a wide range of scenarios. These are illustrated and described in Figure 17 below

Likely Population & Activity Distribution

Population will continue to urbanise and concentrate principally in the eastern corridor – but also along transportation routes – as has been the trend since the foundation of the State.

Likely Infrastructure Requirement

Infrastructure will continue to be required to serve the existing and emerging needs of settlements and economic activities in these development corridors. Developments arising from Brexit and Northern Ireland will significantly intensify the need for fully integrated rail, port, road, air corridors – converging at major termini in Belfast and Waterford.

Emerging Urban Structure

Existing develop as units that are full integrated with rural hinterlands in the established Urban Structures will continue to grow and develop. Prosperity and identity will rapidly improve if greater devolution facilitates more responsiveness to local and regional opportunities.

Emerging Administrative Structure

Provision of full integrated public services at a local level will rapidly improve economic and social conditions in peripheral, local and rural areas. The re-organisation of administration will need to be carefully adapted to local circumstances – with existing county structures being most suitable along the western corridor while the Midland and eastern structures will need to be large and regional.

5.3 NPF Implementation

5.3.1 NPF should be based on Scenarios to facilitate Reviews and Response

The likely future patterns of development and associated needs between now and 2040 cannot be predicted with sufficient accuracy to provide a basis for major investment. Scenarios are required to identify the critical parameters of change under a range of circumstances. These are critical requirements, in order to rigorously carry out comparative 'Cost/ Benefit' assessments of each.

5.3.2 NPF should be Resilient under at least 5 major Scenarios

At least five major scenarios need to be examined to ensure the Resilient of the NPF under all scenarios;

1. Business-as-usual [using current planning and administrative regimes]
2. Business-as-usual + [using improved planning and administrative regimes]
3. Brexit Ireland [Hard Brexit, Independent Scotland and Integrated All-Ireland Approach]
4. Regionalist Ireland [high levels of administrative, policy and fiscal devolution to 4 regions]
5. Urbanising Ireland [further increased urbanisation plus high devolution to urban authorities]

5.3.3 Changing Governance is likely to be the biggest - and least anticipated driver of change

The principle drivers of change over the NPF Period are likely to be demographic and governance. While much attention is paid to the former, little attention has been paid to scenarios in which there are significant changes to systems and standards of administration. Public servants are, rightly, reluctant to speculate on issues such as changes in administration and governance – this must not be allowed to hamper effect scenario development for the NPF.

Ireland is Europe's least devolved State and changes to administrative systems – and associated planning –are overdue and have a high likelihood of occurring during the life of the NPF. Such changes to 'internal' systems will interact with a very volatile 'external' environment – principally due to Brexit and increasing nationalism – both with the EU and the US.

Fig 17 Consolidation of Likely Issue and Trends

Likely Population & Activity Distribution

Population growth and Urbanisation along well-established transport routes is likely to result growth concentration along the East and West Coast Corridors.

The Atlantic Corridor will have a lower density and will consist of many smaller settlements. Those in east will have fewer centres – but much greater density and size in a size ratio of 3:1 compared to the west.

Urbanisation and agricultural changes will continue to drive contraction and aging of populations along the Atlantic and the North Midlands.

These factors will create very different regional offerings and opportunities that are likely to result in new and varied mixtures of economic activities in each area.

This variety of activities provides a ready basis for the development of purpose-based identity, diversity and prosperity through regional specialisation.

WEST IRELAND 2040

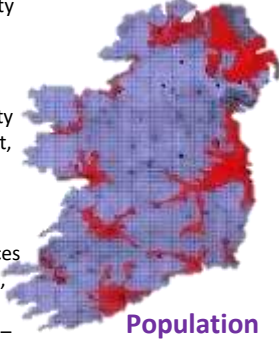
Provides World-class Quality of Life, Food, Amenities, Education and Culture

MIDLANDS 2040

Provides Sustaining Capacity in Energy, Water, Transport, Housing, Logistics and Materials

EAST 2040

Provides Population, Services and Support for High-value, High-intensity Services, Industry and Agri-Business – at World-class Levels of Productivity and Quality.



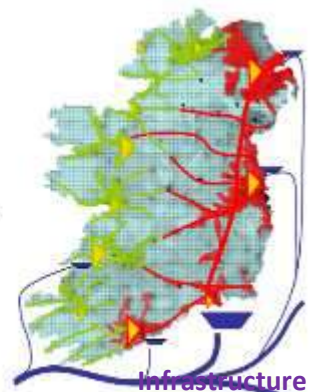
Likely Infrastructure Requirement

Brexit will result in a stronger Dublin – Belfast Corridor. It will also drive the need for much stronger sea links to France. Coastal congestion and erosion coupled with demographics will drive the eastern centre of gravity inland. A resultant new Belfast to Waterford/Cork corridor will require a new rail and motorway corridor.

The Atlantic Corridor will ensure that all coastal and west midland areas have access to high quality infrastructure, airports and urban centres.

Investment will need to be proportionate to the population and productivity of each corridor. Both corridors will meet in Cork and Derry.

A national port will be required at the terminus closest to sea routes where the Limerick-Waterford axis delivers food product to global markets. 95% of Ireland will be within one hour of either of the two national corridors.



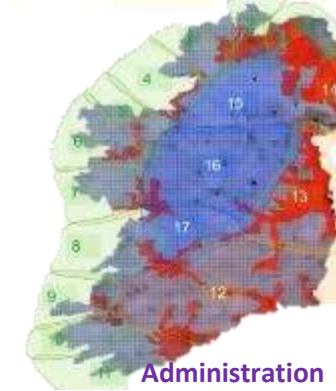
Emerging Administrative Structure

New Demographics and Regionalism will result in more devolved governance.

County-based structures will continue to be most suitable along the peninsulas of Atlantic Ireland – centred on urban centres in Derry, Sligo, Galway, Limerick/Ennis and Tralee/Killarney.

Agglomerations of lower density counties with many similar issues, will be most suitable for the north, mid and southern Midlands - centred on urban centres in Monaghan, Athlone/ Tullamore/ Mullingar, and Kilkenny.

Eastern Ireland will also need three agglomerations of counties centred on Belfast, Dublin and Cork. These will contain the three largest population centres on the island



Emerging Urban Structures

5 Major Urban Centres will be internationally viable as city-regions around Belfast, Dublin, Cork, Limerick/Ennis and Galway which all have ports, airports, universities and national cultural institutions.

2 National Urban Centres will be viable at Derry, and Waterford if they operate in tandem with **9 Regional Urban Centres** at Letterkenny, Monaghan, Sligo, Westport/ Castlebar, Athlone/ Tullamore, Mullingar, Tralee/Killarney, Kilkenny, Clonmel and Wexford.

Significant devolution of functions to each of the four city-regions to achieve the integration of services required for each and all.

In an increasingly devolved system, a **National Capital District** will be required between Dublin’s canals as a location for national administration and institutions.

