



Tionól Reigiúnach Oirthir agus Lár-Tíre Eastern and Midland Regional Assembly

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Review of the National Planning Framework 2018-2040

The Regional Assembly welcomes this stakeholder consultation on the Issues Paper in advance of the review of National Planning Framework 2018-2040. It is noted that the purpose of the National Planning Framework (NPF) is to provide a clear vision to guide future development and investment decisions and is critical in co-ordinating the all-of-Government approach to spatial development which enables choices to be made about place and investment; prioritises decision-making to influence change; and enables greater detail at the appropriate spatial and/or sectoral levels.

The NPF, together with the National Development Plan 2021-2030 (NDP) combine to form Project Ireland 2040, the overarching policy and planning framework for the social, economic and cultural development of Ireland.

The NPF was published in 2018 and covers the period from 2018 to 2040. The Planning and Development Act 2000, as amended, requires the Government to either revise, replace or state why the Government has decided not to revise, every six years after the publication of the NPF. In this respect, the Government, in June 2023, decided to undertake a revision to the NPF, in recognition of the need to account for particular changes which have taken place since 2018 which require consideration in the context of potential amendments to the current Framework.

This submission is tailored to address the key issues and themes which have been identified within the Issues Paper and is structured to include an overall context, detailing the role and function of the Regional Assembly and the importance of the Regional Spatial and Economic Strategy (RSES), including the priorities of the Eastern and Midland Region.

1.0 Overall Context

1.1 Role and Function of the Regional Assembly

The role and function of the Regional Assembly, including the scope of the RSES, is currently provided for in the Planning and Development Act 2000, as amended. This legislation is currently under review, and the Planning and Development Bill 2023 was approved by Cabinet on 3rd October and is due to be published in the coming weeks. Section 27 (1) of the draft Bill (prior to its approval by Cabinet) states that the objectives of an RSES shall be to support the implementation of the National Planning Framework and to support the economic policies and objectives of the Government. Furthermore, Section 27(5) of the draft Bill states that an RSES shall be materially consistent with the National

Planning Framework. It is anticipated that the Planning and Development Bill 2023 will be enacted into legislation in the coming months.

1.2 The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region

The current RSES for the Eastern and Midland Region was made by the Members of the Assembly in June 2019 and is a strategic plan and investment framework to shape future growth throughout the Region. The overall vision of the Strategy is to create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunity for all. The vision of the RSES is supported by 16 Regional Strategic Outcomes (RSOs) that are framed around the 3 key principles of Healthy Placemaking, Climate Action and Economic Opportunity. These Regional Strategic Outcomes are closely aligned with and supportive of the National Strategic Outcomes of the National Planning Framework.

A primary statutory objective of the Regional Spatial and Economic Strategy (RSES) is to support the implementation of the National Planning Framework (NPF), aligning with the investment priorities of the National Development Plan 2021-2030 (and thus Project Ireland 2040), by coupling new development with the requisite investment in services and infrastructure. The RSES is of critical importance for the delivery of Project Ireland 2040, given that it is the succeeding tier of policy delivery in Ireland.

1.3 Ensuring Spatial Alignment

The RSES for the Eastern and Midland Region presents a Spatial Strategy, devised and informed by a complementary Economic Strategy, which provides a framework for future growth, ensuring the delivery of effective regional development through the realisation of viable and vital places. This includes championing the capital city of Dublin as a smart, climate resilient and global city region; securing Athlone, Drogheda and Dundalk as Regional Growth Centres, acting as regional economic drivers and supports for their wider catchment areas; and promoting a network of large economically active Key Towns (which include Swords, Maynooth, Bray, Navan, Naas, Wicklow, Longford, Mullingar, Tullamore and Portlaoise) that provide employment and services to their surrounding areas. All of this is supported by Self-Sustaining Growth Towns, Self-Sustaining Towns and a network of multifaceted Rural Places.

The review of the NPF should reflect this Spatial Strategy and the settlement hierarchy presented, to allow managed and sustainable growth that enables each place fulfil ambition and potential.

1.4 Strategic Growth Enablers of the Eastern and Midland Region

The vision of the RSES is ‘to create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel, and employment opportunities for all.’

The RSES for the Eastern and Midland Region provides a framework for investment to better manage spatial planning and economic development throughout the Region, and in this respect presents Growth Enablers that identify the strategic priorities for the Region. These are:

- Promote global connectivity and regional accessibility as part of an integrated land use and transport strategy, with a focus on protecting national assets and enhanced inter-regional connectivity.
- Support the future success of Dublin as Ireland’s leading global city of scale by better managing strategic assets to increase opportunity and sustain national economic growth and competitiveness.
- Deliver strategic development areas identified in the Dublin Metropolitan Area Strategic Plan (MASP) to ensure a steady supply of serviced development lands to support Dublin’s sustainable growth.
- Facilitate collaboration to support the development of the Dublin-Belfast Economic Corridor, to drive synergy in the Drogheda-Dundalk-Newry cross border network and strengthen economic links with the south east extending to Rosslare Europort.
- Target significant growth in the Regional Growth Centres of Athlone, Drogheda and Dundalk to enable them to act as regional drivers, with a focus on improving local economies and quality of life to attract investment and the preparation of urban area plans (UAPs).
- Promote compact urban growth to realise targets of at least 50% of all new homes to be built, to be within or contiguous to the existing built-up area of Dublin city and suburbs and a target of at least 30% for other urban areas.
- Embed a network of Key Towns throughout the Region, which have the capacity to deliver sustainable compact growth and employment for their catchments in tandem with enabling public transport, infrastructure and services.
- Promote balanced growth in a limited number of economically active settlements which have the identified capacity and potential for self-sustaining growth.
- Promote targeted ‘catch up’ investment to support self-sustaining local employment, and in services, sustainable transport and amenities in places that have experienced rapid commuter driven population growth.
- Promote regeneration and revitalisation of small towns and villages and support local enterprise and employment opportunities to ensure their viability as service centres for their surrounding rural areas.
- Support rural areas by harnessing natural resources to develop renewables, recreation and tourism opportunities including green infrastructure planning and the development of an integrated network of greenways, blueways and peatways.

2.0 Submission

The preparation of the Issues Paper for the revision to the NPF has taken into consideration the matters to be addressed as set out in Section 20C (2) of the Planning and Development Act 2000, as amended, and pertain to the identification of nationally strategic developments that have occurred since the current NPF was published in 2018. In this respect the Issues Paper has been structured under strategic policy issues which are considered the drivers for change. Specifically, this refers to future population and employment requirements, infrastructural priorities, environmental conservation, co-ordination with marine planning and the promotion of sustainable settlement and transportation regarding climate change. These matters have also been influenced by the recommendations of the Expert Group who were tasked with a high-level overview of the NPF and with identifying matters to be considered

in the first statutory assessment of the NPF. The Expert Group's report and its recommendations were published in August 2023.

The strategic policy issues, therefore, are discussed under the following headings:

1. Climate transition and our Environment
2. Population and Demographics
3. Regional Growth and Ambition
4. Compact Growth
5. Digitalisation
6. Investment and Prioritisation

Having considered the Issues Paper, this submission outlines the observations of the Regional Assembly in relation to the strategic policy issues identified in the Issues Paper.

2.1 Climate Transition and our Environment

The Issues Paper outlines that from a national policy perspective, the current NPF already provides a robust and established means to implement and integrate climate change objectives, including adaptation, at national, regional and local level and the transition to a low carbon and climate resilient society. The NPF also states *'in addition to legally binding targets agreed at EU level, it is a national objective for Ireland to transition to be a competitive low carbon, economy by the year 2050'*. Furthermore, there are a number of National Policy Objectives within the NPF which include specific measures and approaches that relate to addressing climate change and the transition to net zero.

However, the Issues Paper notes that since the publication of the NPF in 2018, there have been climate-related developments that need to be taken into consideration. The most significant is Ireland's commitment under the Climate Action and Low Carbon Development (Amendment) Act 2021 to reduce greenhouse gas emissions by 51% and increase the share of electricity generated from renewable sources by up to 80% by 2030, and in line with European Climate Law, to being net zero carbon by 2050. The Issues Paper identifies that in order to ensure Ireland is on track to achieve these targets, a plan-led approach to supporting the objectives of the Climate Action Plan 2023, which set out the sectoral emissions ceilings, is required.

Climate Action is identified as a key principle of the RSES, and the RSES provides a Climate Action Strategy to accelerate climate action; ensure a clean and healthy environment; and to promote sustainable transport and strategic green infrastructure. The RSES identifies that investment is required to enhance climate resilience and to accelerate a transition to a low carbon economy recognising the role of natural capital and ecosystem services in achieving this. In this respect the RSES is focussed on five primary areas to address the challenges of climate action, these are: sustainable development patterns which promote compact growth, reduce transport demand and encourage low carbon transport modes; sustainable transport systems (people and freight); carbon storing and sequestering land uses; energy efficient buildings and industry; and renewable energy.

The Regional Assembly would welcome a focus on these areas within the revision to the NPF with an emphasis on focusing on the transition to a competitive, low-carbon, climate-resilient, circular and environmentally sustainable economy and investing in an energy efficient and climate resistant built environment.

2.2 Population and Demographics

The Issues Paper emphasises that one of the main roles of the current NPF is the spatial distribution of population growth across the Country, and so the review to the NPF must carefully consider any changes to population growth in the intercensal period between Census 2016 and Census 2022, and how this will be applied to any revision of the NPF.

The current NPF predicts that the population of Ireland will increase to almost 5.7million people by 2040, with an additional 490,000-540,000 people in the Eastern and Midland Region (population of approximately 2.85m people). By 2022, the current NPF projected a population of just over 5.1m people in Ireland.

The 2022 Census results are in the process of being published, and the available key findings indicate that national population growth is broadly in line with the overall NPF population projection thus far. In this respect, the Census 2022 indicated a population of 5.15m people for the Country, 50,000 more than the NPF had projected.

The Issues Paper states that Census 2022 has identified a greater rate of natural increase in Dublin and the mid-east, particularly in Counties Fingal, Kildare, South Dublin and Meath. Furthermore, the average annual rate of growth for the migration component is highest in Counties Longford and Meath for the Eastern and Midland Region. In terms of regional population growth, the Issues Paper outlines that the Eastern and Midland Region performed above the national average at 8.7% (national average is 7.6%) and also accounted for 56% of overall population growth since Census 2016. In summary the results from the Census 2022 show that national population growth is broadly in line with the overall NPF population projection to 2022, however, the distribution of growth over the same period (2016-2022) was weighted in favour of the east, with more than half of population growth in the Eastern and Midland Region at the time.

It is clear that these population and demographic trends present a number of policy implications for the revision of the NPF. As indicated by the Issues paper, in the Eastern SPA, there continues to be strong market demand for housing in these areas and market capacity to deliver. Whilst supporting the overall framework of the NPF and the commitment to balanced regional development, the Assembly supports the statement within the Issues Paper that reflection is needed on the spatial distribution of population growth evident in the census results. The Assembly considers this important in order to address the challenges of serving population increases of scale.

It is noted that the results of the Census also show an increasingly aging and diverse population. In light of the Census 2022 results indicating an increasingly aging and diverse population, the Regional Assembly would encourage the inclusion of planning policies for an aging population in its revision.

2.3 Regional Growth and Ambition

The Issues Paper states that one of the overarching strategies in the current NPF is concerned with achieving regionally balanced growth, taking into consideration that Census 2016 indicated a 70:30 split in population growth between the Eastern and Midland Region and the rest of the Country. The current NPF recognises that continued investment in Dublin and the east is critical to support the future growth of Dublin as an international city of scale, and with this in mind, and with an aim to

provide balanced regional growth, the current NPF is focussed on an approximately 50:50 split between the Eastern and Midland Region, and the rest of the Country.

The Issues Paper highlights that the emerging trends detailed in Census 2022 indicate that regional population growth is changing and is leaning towards a more balanced ideal, with population growth split 55:45 between the Eastern and Midland Region and the rest of the Country. The current NPF is focused on the delivery of structural housing targets, and not just traditional population growth and therefore in terms of regional growth, the Census 2022 has identified that the Eastern and Midland Region has accounted for 58% of the increase in housing stock over the intercensal period, with the remainder in the rest of the Country. Furthermore, the population growth in the Regional Growth Centres of Athlone, Drogheda and Dundalk has steadily increased over the intercensal period.

The Issues Paper states that the move towards a more regionally balanced distribution of growth, and city-focussed growth, will be important in ensuring effective regional development and in supporting overall competitiveness, economic prosperity, environmental sustainability and climate adaptation.

The Regional Assembly agrees that regional growth needs to be balanced further throughout the remainder of the Country, however, it is important that the revision of the NPF recognises the importance of Dublin, and its supporting hinterland, the MASP area, as an international city of scale, and the focus needs to remain on protecting the capital city and the Eastern region in this respect. Furthermore, it is important to note that areas of the Eastern and Midland Region, notably the Midland Region, are underperforming with respect to population growth, and this is reflected in the results of the Census 2022 population growth for the Midland Region which is at 12%, while the population growth for the Dublin region was 52%, and 36% of the growth occurred in the Eastern Region. Furthermore, the Midland Region is currently facing a number of added challenges such as inward migration at scale and economic challenges, including those associated with the EU Just Transition Fund. The revision of the NPF should address this, including intraregional imbalance within the Eastern and Midland Region, and the need to support Dublin and the wider metropolitan area to secure regional growth and ambition.

With regard to Governance and Institutional Structures, the Regional Assembly has previously indicated that implementation gaps do exist which are considered to impact regional and city growth targets. Of particular relevance to the Assembly (and as highlighted to the Joint Oireachtas Committee on Housing, Local Government and Heritage) is the need for statutory support mechanisms relating to MASP delivery. Currently EMRA oversees and drives MASP Implementation through a committee (made up of elected representatives) and an Implementation Group which includes stakeholders from the infrastructure and enterprise agencies, local authorities and Department of Housing Local Government and Heritage. This structure is not supported by any legislative framework. A new statutory responsibility relating to MASP Implementation, that enables the Regional Assemblies to coordinate and prioritise MASP Implementation with key stakeholders, would be beneficial in this regard.

2.4 Compact Growth

With regards to compact growth, the current NPF establishes a target to deliver at least half (50%) of all new homes that are targeted in the five cities and suburbs, and at least 30% of all new homes that are targeted in settlements other than the five cities and their suburbs, within their existing built-up footprints.

The Issues Paper highlights that a cornerstone policy of the review of the NPF will be targeting a more compact form of urban development and it notes that the compact growth policy of the current NPF specifically addresses the identified need for a more sustainable form of development in Ireland's cities and towns.

The Issues Paper also notes that since the adoption of the NPF in 2018, there have been a number of developments in national policy that have a bearing on the compact growth objectives of the current Framework. These include national policies such as Town Centre First, Croí Cónaithe schemes, Climate Action Plans, Residential Zoned Land Tax, Regional Development Funds, and Ministerial Guidelines.

The Issues Paper outlines that the recommendations of the Expert Group in relation to compact growth concluded that the current compact growth targets are insufficiently ambitious, and the review should consider stronger and more ambitious targets in this respect. The Group also made recommendations in relation to monitoring and evaluating these compact growth objectives.

It is noted that the focus of compact growth also overlaps with the focus of climate action, as the requirements of the Climate Action and Low Carbon Development Act and successive Climate Action Plans and the scale of the targets for emissions reductions will require an acceleration in the delivery of compact growth.

The Regional Assembly agrees that the focus on compact growth should be strengthened, and consideration should also be afforded to defining, measuring and monitoring compact growth, in order to ensure its delivery.

2.5 Digitalisation

The Issues Paper highlights the advancements in the digitalisation of society since the publication of the NPF in 2018, and its impact on the way we live and work. In this respect, advancements in technology, and the impact of the pandemic of Covid 19, have led to a significant increase in remote working, which has also led to an increase in online shopping. This shift has impacted on the traditional office model, the traditional retail model and has impacted on the development of the centres of towns and cities as places to work and shop. As a result of these technological advancements, the Issues Paper emphasises the need to ensure that Ireland is providing attractive places for people to live, work and invest in, as options with respect to places of living and working, include opportunities to work remotely abroad, have increased.

Healthy Placemaking and Economic Opportunity are identified as key principles of the RSES. These focus on promoting people's quality of life through the creation of healthy and attractive places to live, work, visit and invest in, and creating the right conditions and opportunities for the Region to realise sustainable economic growth and quality jobs. One of the approaches to achieving this is to improve the attractiveness of the Region as a place to work or to attract investment through smart specialisation, focusing on the Region's key sectoral strengths and the activities that support these strengths. Similarly, the clustering of similar businesses and industries in locations will also strengthen business ecosystems, and the Region's attractiveness for investment.

The Regional Assembly encourages the focus of the review of the NPF with regards to the advancements in digitalisation and technologies to be directed to supporting policies such as smart specialisation and clustering.

2.6 Investment and Prioritisation

As previously referenced in this submission, at a national level the NPF and the NDP combine to form Project Ireland 2040. The NPF sets the vision and strategy for the development of Ireland to 2040, while the NDP provides the supporting capital investment plan for the period 2021-2030. This ensures effective co-ordination between the NPF and sectoral budgetary plans across Government, with a focus on the shared National Strategic Outcomes of the NPF and NDP.

The Urban Regeneration and Development Fund (URDF) and Rural Regeneration Development Funds (RRDF) are the flagship investment programmes of Project Ireland 2040, established to support National Planning Framework objectives through the sustainable regeneration and rejuvenation of Ireland's five cities and large towns (URDF) and smaller towns (RRDF).

The Issues Paper highlights that the revision to the NPF is an opportunity to bring a greater clarity to the identification of major gaps in infrastructure delivery which are preventing the securing of the spatial objectives of the Framework and the prioritisation of these projects.

The three key principles of the RSES, Healthy Placemaking, Economic Opportunity and Climate Action require investments in placemaking throughout the Region that facilitate environmentally sustainable economic development - primarily developing places that are attractive for business investment and for people to live and work, all in the context of a climate-resilient society. This also involves a need for a continuous flow of investment in transport, water and digital infrastructure, and prioritising the delivery of key enabling infrastructure. The Regional Assembly recommends that the review of the NPF should prioritise and direct investment in this regard, taking into consideration the spatial strategy for the Region, outlined in Section 1.3 of this submission.

In addition to the above and addressing the areas, as stated in the Issues Paper of institutional arrangements and monitoring and reporting, the Regional Assembly considers it important to highlight their role in this regard which should be considered as part of the NPF process. Section 25A of the Planning and Development Act requires that government departments and each local authority shall, every 2 years, prepare and submit a report to the Assembly setting out progress made in supporting objectives of the Regional Spatial and Economic Strategy (RSES) and thus Project Ireland 2040. The reports of the government departments and local authorities are then incorporated into an overall Monitoring Report prepared by the Regional Assembly, which details progress made in implementing the regional policy objectives of the RSES. This Report is sent to NOAC, who may make recommendations to the Minister.

This requirement for public bodies to prepare and submit a progress report to the Assembly, as currently required under Section 25A. (1) of the Act, has been removed under the Planning and Development Bill 2022. The Assemblies consider this to be a retrograde step as public bodies (departments, bodies and agencies) play a significant role in implementing the development objectives of the RSES (and Project Ireland 2040) and should be required to prepare a report on progress made in implementing the RSES, as they have done so under the current provisions of the Act.

In addition to the above, and notwithstanding Sections 30(10) and 30(12) of the 2022 Bill, the Assemblies consider that the provisions of Section 22A. of the current Planning and Development Act should also be reinstated in this regard, as part of national planning legislation in order to ensure coordination of regional spatial and economic strategy preparation and implementation with the strategies, plans and programmes of public bodies, and importantly that this applies vice versa.

Successful implementation and delivery of a regional spatial and economic strategy, and indeed the NPF, depends on ensuring that actors with responsibility for delivery, at all times subscribe to the same worldview and agreed approach to ensure implementation and delivery.

The reinstatement of the above-mentioned Sections of the Planning and Development Act, coupled with explicit support for the Regional Assemblies in this regard, would assist in addressing questions within the Issues Paper including, “How could the process for ensuring alignment between the sectoral strategies of Departments and Agencies and the objectives of the National Planning Framework be improved?” and, “In order to strengthen monitoring of the Framework should Departments which have larger demand-led investment programmes be required to monitor and report on the share of investment for each of the three regional assemblies and five cities?”

2.7 Other Considerations

The current NPF presents a strong policy architecture, and, as mentioned in Section 2.6, the National Development Plan will outline the supporting capital investment to implement the policies in the Framework. However, notwithstanding the funding opportunities of the NDP, the review of the NPF presents an opportunity to consider the implementation process of the agreed policies, including consideration of the practicalities of their delivery and implementation. In this regard, the inclusion of a clear Implementation, delivery and monitoring framework for the NPF may be beneficial.

3.0 Conclusion

The Regional Assembly welcomes the opportunity to engage in the process of revising the National Planning Framework (NPF) and looks forward to continuing engagement with the Department of Housing, Local Government and Heritage in the further development and implementation of an updated NPF in order to support economic, social, environmental and cultural development throughout the Region.

Regards,



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