



Tionól Réigiúnach an
Oirthir agus Lár Tíre
**Eastern and Midland
Regional Assembly**

Eastern and Midland Regional Assembly

Submission on the Draft First Revision to the
National Planning Framework

September 2024



Submission of the Eastern and Midland Regional Assembly on the Draft First Revision to the National Planning Framework

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1.0 Overall Context

The Eastern and Midland Regional Assembly notes the publication of the Draft First Revision to the National Planning Framework 2018-2040 and sets out hereunder submissions and observations on behalf of the Assembly in accordance with Section 20C(6)(a) of the Planning and Development Act, 2000 (as amended). This submission has been prepared by the executive and approved by the members of the Eastern and Midland Regional Assembly at a special meeting of the Assembly on the 4th of September 2024.

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 broadly follows the chapter headings of the Draft First Revision to the National Planning Framework 2018-2040, 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.

The submission sets out a **number of recommendations** that the Regional Assembly consider are required to enable the delivery of the National Planning Framework and its objectives. These are contained at section 3.0 of this submission.

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 2023 and has completed Seanad Éireann, Third Stage (July 2024). Section 28(2) of the draft Bill 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 28(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.

In addition to the role and function of the Assembly provided for in the Planning and Development Act 2000, as amended, and in the Planning and Development Bill 2023, the Assembly participates in the design and delivery of EU funding programmes, notably the EU Just Transition Fund; is secretariat to

the national delegation to the Committee of the Regions (CoR), and; oversees and supports the Irish Regions European Office (IREO) in Brussels which operates as part of the Eastern and Midland Regional Assembly and with the support of the Department for Housing, Local Government and Heritage. All of these functions support the implementation of the NPF at the regional level.

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.

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 First Revision to the National Planning Framework 2018-2040 reflects changes to government policy that have taken place since its initial publication, such as climate transition, regional development, demographics, digitalisation and investment and prioritisation. In doing so, it reflects this Spatial Strategy and the settlement hierarchy presented, to allow managed and sustainable growth that enables each place fulfil ambition and potential.

2.0 Submission

The preparation of the Draft First Revision to the National Planning Framework 2018-2040 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. The submission

broadly follows the chapter headings of the Draft First Revision to the National Planning Framework 2018-2040 in addition to SEA, AA and SFRA, under the following headings:

- 2.1 The Vision
- 2.2 A New Way Forward
- 2.3 Effective Regional Development
- 2.4 Making Stronger Urban Places
- 2.5 Planning for Diverse Rural Places
- 2.6 People Homes and Communities
- 2.7 Realising our Island and Marine Potential
- 2.8 Working with our Neighbours
- 2.9 Climate Transition and Our Environment
- 2.10 Implementing the National Planning Framework
- 2.11 Appendices
- 2.12 Environmental Assessments
- 3.0 Recommendations
- 4.0 Conclusions

2.1 The Vision

Chapter 1 of the Draft First Revision includes the vision of the NPF and how it will be achieved; the National Strategic Outcomes; a rationale for the revision; a statement regarding alignment with the Sustainable Development Goals, and; a section on Environmental Assessments.

The Assembly welcomes the retention of the strategic vision of the NPF, with updates to take account of changes that have occurred since it was published in 2018 and to build on the Framework. In particular, the Assembly welcomes the retention of specific references to the key role of the regions, cities and settlements in achieving more balanced growth, and our close relationship with Northern Ireland taking account of the key links between Drogheda, Dundalk and Newry which are at the core of the Dublin-Belfast Economic Corridor. The Draft First Revision further recognises that in 2019 and 2020, the NPF has been incorporated into Regional Spatial and Economic Strategies (RSEs), made by the Regional Assemblies, which will be reviewed by the Regional Assemblies to be consistent with the revised NPF. Furthermore, the Assembly welcomes the recognition by the Framework that through the statutory Metropolitan Area Strategic Plans - which are integrated land-use and transportation strategies for the metropolitan areas included in the RSEs - the NPF provides for more strategic and coordinated planning across cities and large towns across local authority boundaries and can deliver strengthened and more environmentally focused planning at the local level.

The Assembly welcomes specific reference to the Urban and Rural Regeneration and Development Funds which support the key principles of strategic growth and renewal across our urban and rural communities under the National Development Plan, as well as targeted legislative provisions for land activation and land management aimed at ensuring that the potential for urban development and regeneration in the built-up area of cities and towns can be harnessed. Notwithstanding, there are EU funds which also drive and support the aims of the National Planning Framework, for both urban and rural areas. The Assembly recommends that the revised NPF makes reference to these funds. At the regional level, these include the European Regional Development Fund (ERDF) and the EU Just Transition Fund (EU JTF), both of which are part of the European Cohesion Policy and are managed by the Regional Assemblies. With respect to the ERDF, the Eastern and Midland Regional Assembly is the National Contact Point (NCP) for the URBACT programme which promotes integrated sustainable urban development in cities and towns across Europe. Furthermore, in 2023 the Eastern and Midland Regional Assembly was appointed as the European Urban Initiative's (EUI) Urban Contact Point (UCP).

The EUI sets out to help realise the Urban Agenda for the EU by fostering city-led innovation, the sharing of urban knowledge, practice, and to further build capacity.

Shared Goals – Our National Strategic Outcomes (NSOs)

The Assembly welcomes the retention of the 10 NSOs, with updated text in Section 1.3 of the Draft First Revision in relation to NSOs pertaining to sustainable mobility (NSO 4), a strong economy supported by enterprise, innovation and skills (NSO 5), high-quality international connectivity (NSO 6), and transition to a low carbon climate resilient society (NSO 8).

The updated text in NSO 4 is supportive of the ongoing work of the Regional Assemblies who, with the support of the Department of Transport, are delivering the Pathfinder 27 Project, the Smart and Sustainable Mobility Accelerator Programme (SSMA) which aims to support local authorities and stakeholders across our Regions to design and implement smart and sustainable mobility projects under the National Sustainable Mobility Policy (SMP) Action Plan 2022-2025. Furthermore, under Priority 3 of the EU Just Transition Fund for which the Assembly is the managing authority, we are working with the National Transport Authority (NTA) to support the decarbonisation of local public bus routes and private bus fleets, and Zero Emission Vehicles Ireland (ZEVl) to support the installation of publicly available charge point infrastructure at community centre sites across the EU Just Transition Territory.

Under NSO 5, the updated text supports the principles of regionally based smart specialisation. Smart Specialisation is a key principle underpinning the European Commission's Cohesion Policy for the period 2021-2027 in the Research, Technology, Development and Innovation (RTDI) priority and is a key element of the economic strategy of RSES for the Eastern and Midland Region. The updated text is supportive of the Assembly's ongoing engagement with the Department of Enterprise, Trade and Employment (DETE) to support implementation of the National Smart Specialisation Strategy for Innovation 2022-2027 (S3) to create and build on regional competitive advantages, create future market opportunities and identify solutions to identified societal challenges.

NSO 6 has been updated in the Draft First Revision to include support for planned investments in Dublin Airport and Dublin Port. The RSES for the Eastern and Midland Region recognises the importance of both Dublin Airport and Port as significant economic assets, particularly with their locations on the Dublin-Belfast Economic Corridor.

The updated text in NSO 8 is to update the Framework to take account of the Climate Action and Low Carbon Development (Amendment) Act which was enacted in 2021 and the National Climate Action Plan, which is reviewed annually. This is supportive of the ongoing work of the Assembly in relation to the implementation of the RSES Climate Action Strategy which, through ongoing stakeholder engagement, is working to accelerate action and ensure a clean and healthy environment and to promote sustainable transport and green infrastructure. It is further supportive of the Assembly's work as managing authority for the EU Just Transition Fund in Ireland, which is helping communities across Europe meet the challenges posed by the transition to a zero-carbon economy.

What Happens If We Do Nothing?

Section 1.4 of the Draft First Revision has been updated to make reference to the 2023 Expert Group Review of 2018 NPF Strategy and its implementation. Overall, the Group recommended that the NPF revision could strengthen the Strategy in three broad respects:

- Compact growth targets should be more ambitious and more clearly defined;
- The roles of the bodies involved in its implementation should be clarified and strengthened (particularly in relation to the Metropolitan Area Strategic Plans) and mechanisms put in place for more detailed measurement and monitoring of its progress; and

- There should be greater coordination at whole of government level across all infrastructure projects (including the NDP) and new efforts made to generate broader support for national spatial planning across all of society.

Regarding the second recommendation of the Expert Group relating to the roles of bodies involved in NPF implementation with specific reference to the Metropolitan Area Spatial Plans (MASPs), the Assembly considers that the Regional Assemblies should be directly referenced at this juncture given that the MASPs are integrated elements of the statutory Regional Spatial and Economic Strategies, which are made by the Regional Assemblies. Furthermore, while the second recommendation called for mechanisms to be put in place for more detailed measurement and monitoring of its progress, the current draft of the Planning and Development Bill (No. 81b of 2023) states that the Regional Assembly shall prepare a report monitoring progress made in implementing the regional spatial and economic strategy every four years, rather than every two years as set out in the current planning legislation, Section 25A of the Planning and Development Act 2000 (as amended). The Assembly considers that more regular reporting improves coordination which supports local authorities, government departments, and their agencies, to focus on consistent agreed strategic outcomes and that the retention of a two-year monitoring timeframe (as opposed to a 4-year timeframe as set out in the draft Bill) would facilitate more timely and streamlined reporting to improve coordination and more effectively deliver the strategic outcomes of the NPF.

The Assembly considers that the Regional Assemblies can play an important role in coordination at whole of government level in relation to infrastructure projects (including the NDP) in generating broader support for national spatial planning across all of society. See also Section 2.3 of this submission relating to ‘Effective Regional Development’ and Section 2.10 relating to ‘Implementing the NPF.’

UN Sustainable Development Goals

As in the 2018 NPF, Section 1.5 of the Draft First Revision identifies significant alignment between the UN Sustainable Development Goals (SDGs) and the NPF’s National Strategic Outcomes (NSOs) in areas such as climate action, clean energy, sustainable cities and communities, economic growth, reduced inequalities and innovation and infrastructure, as well as education and health. Through our ongoing work, the Assembly pursues the Sustainable Development Goals by working for sustainable prosperity, which involves meeting people’s needs while staying within ecological limits. To facilitate this, the Assembly considers that the revised NPF would benefit from more direct mapping of the SDGs onto the NSOs to more clearly demonstrate alignment. This would also assist with the implementation of NPO 14 which has been updated in the Draft First Revision to ensure progress toward national achievement of the UN Sustainable Development Goals, including through the mapping of sustainability to subordinate policies.

Environmental Assessments

The first chapter of the Draft First Revision includes a new section, Section 1.6, on environmental assessments. In the NPF 2018, the equivalent text was included as Chapter 11. The text has been streamlined and summarised for incorporation into Chapter 1 with sections on environmental assessment (including sub-sections for Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment) and integrating environmental considerations into the planning system (including a sub-section on relationships between the National Planning Framework and other plans/programmes). The Assembly welcomes this approach as it acts to locate consideration of environmental impact more centrally within the vision of the NPF, recognising that the delivery of the NPF will give rise to development and infrastructure which has the potential to impact on the receiving environment.

2.2 A New Way Forward

Chapter 2.0 of the Draft First Revision sets out the ambition of the NPF to enable all parts of Ireland, whether rural or urban, to successfully accommodate growth and change, by facilitating a shift towards Ireland's regions, cities and regional centres other than Dublin, while also recognising Dublin's ongoing key role. An overview of the NPF strategy is provided which focuses on Ireland's three Regions; Ireland's capital (Dublin); Ireland's cities; Ireland's rural fabric, and; compact growth. The Assembly welcomes the strong regional focus of the strategy and in particular welcomes the addition of new elements including:

- Prioritisation of key enabling infrastructure in each region to promote growth where it is required.
- Recognising and supporting enterprise specialisations and clusters, which can drive economic activity in each region.
- Recognising the impact of digitalisation in terms of city vibrancy, including changed shopping and working patterns, and to promote a responsive policy approach where needed.
- In the context of Ireland's transition towards a climate-neutral economy, to ensure just transition, within the wider statutory framework of climate action, enabling new employment and opportunities, while supporting those most negatively impacted.

As in the 2018 NPF, the various policies in the Draft First Revision are structured under National Policy Objectives (NPOs). Most NPOs of the 2018 NPF are retained in the Draft First Revision - some having been updated and amended - and a number of new NPOs have been inserted.

Section 2.3 of the Draft First Revision contains updated projections on how Ireland's population will grow and change between now and 2040 based on modelling undertaken by the Economic and Social Research Institute (ESRI). The ESRI projections form the basis for the revised NPF. The 2018 NPF planned for population growth of 1.1 million people, and a total population of 5.85 million by 2040. The ESRI has updated its national and regional population projections to account for Census 2022 and to take account of up-to-date economic, fertility, mortality and migration data. The updated projection is that **the population of Ireland will increase to approximately 5.7 million by 2030 and to 6.1 million by 2040**. Given the key role of international migration in shaping population growth in Ireland, the ESRI have also modelled a **higher international migration scenario with a projected population of 6.3 million people by 2040 (baseline + 200,000)**. This means that the NPF will now need to plan for a population of 6.1 million by 2040, **an additional 250,000 people over that planned for in the 2018 NPF**. In effect, the Framework needs **to plan to accommodate around 950,000 additional people in Ireland between 2022 and 2040, while also making provision for a higher in-migration scenario**.

Growing our Regions

Section 2.4 of the Draft First Revision maintains the 'regional parity' approach, with additional population growth projected between 2022 and 2030 targeted on a pro-rata basis across the three NUTS 2 regions, with the aim of building the capacity of all regions and places to accommodate future growth. The resulting National Policy Objective (NPO 2) is that the projected level of population and employment growth in the Eastern and Midland Regional Assembly area will be at least matched by that of the Northern and Western and Southern Regional Assembly areas combined. While the Regional Assembly agrees that regional growth needs to be balanced further throughout the remainder of the Country, the Assembly strongly welcomes the explicit recognition of the importance of Dublin, and its supporting hinterland, the MASP area, as an international city of scale in the Draft First Revision, as well as the need to protect the capital city and the Eastern Region in this respect.

NPO 3 in the Draft First Revision updates the population growth targets for each of the NUTS 2 regions with a target of approximately **470,000 additional people in the Eastern and Midland Region** between 2022 and 2040 (c. 690,000 additional people over 2016-2040) i.e. **a population of almost 3 million**.

The Draft First Revision states that *“the scale of growth that is projected in Ireland to 2040 coupled with the need to transition to a lower carbon society requires an increased delivery of housing and the improved integration of land-use and transport.”* In addition, *“Census 2022 and other indicators highlight significant unmet demand for housing in Dublin and the Mid-Eastern Region in particular, which has the potential to undermine national competitiveness and social cohesion. As a result, it notes that there may be a requirement to plan for population growth that could exceed the overall 6.1m projection, in line with the high migration scenario provided in the ESRI’s Report.”* The Assembly welcomes the explicit recognition by the draft Framework that this can only be undertaken and delivered in line with longer term strategic planning for Transport Orientated Development (TOD) in Ireland’s five Cities. This approach will support the delivery of new sustainable communities at brownfield and greenfield locations along existing or planned high-capacity public transport corridors within the metropolitan area, with a particular focus on TOD opportunities along high-capacity rail corridors.

In many instances, the delivery of TOD will require additional investment in public transport infrastructure and services. This is likely to variously take the form of an acceleration in current plans, the development of new proposals, or the reopening of proposals that have been put aside. The Assembly will reflect the revised NPF’s emphasis on TOD in updating the RSES. Notwithstanding, the Assembly notes the need for the increased and accelerated public transport investment required to give effect to TOD to be reflected in the implementation of the National Development Plan and the Greater Dublin Area Transport Strategy. The Assembly notes that the GDA Transport Strategy may need to be partly revised to reflect the additional ambition for TOD, which will be contained in the revised NPF and the revised RSES.

Furthermore, the Assembly has concerns regarding the successful implementation of the Draft First Revision in the absence of required housing figures to facilitate the desired population growth. The Assembly considers that, in order to successfully implement the NPF, housing figures required to accommodate the desired population growth, should be set out as part of the NPF in order to inform the planning hierarchy of statutory planning documents, or a documented pathway for same, to avoid a policy vacuum. This is particularly important for the Eastern and Midland Region which the Draft First Revision highlights *“significant unmet demand for housing in Dublin and the Mid-Eastern Region in particular”* as noted above.

The Draft First Revision notes that seeking a shift in the pattern of development away from current trends means planning for employment and jobs at locations that are integrated with the planned distribution of population. The Assembly welcomes the explicit recognition in the draft Framework that securing the regional population growth targets will require a commensurate level of employment and jobs growth, with population and employment distribution being considered in an integrated manner.

Building Stronger Regions

The Assembly welcomes the continued focus in Section 2.5 of the Draft First Revision on building stronger regions through a focus on supporting and building internationally, nationally and regionally strong and accessible centres of scale (cities and towns). To support this ambition, NPO 4 is that a target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs. NPO 5 highlights the regional role of Athlone in the Midlands and the Drogheda-Dundalk-Newry cross-border network and notes the need to support their development in the RSES and in Regional Enterprise Plans, which is further welcomed by the Assembly.

The Draft First Revision to the NPF states that this means more targeted growth everywhere, including for the four regional cities. The Draft First Revision further asserts that the scale of growth that is projected in Ireland to 2040, coupled with the need to transition to a lower carbon society, requires an increased delivery of housing and the improved integration of land-use and transport.

Regarding the key issues of governance and oversight to support the delivery of NPF objectives, please refer to Section 2.10 of this submission 'Implementing the National Planning Framework' which sets out particular concerns of the Assembly in relation to same.

Securing Compact and Sustainable Growth

Section 2.6 of the Draft First Revision notes that the fastest growing urban areas continue to be at the edges of and outside our cities and towns meaning high levels of car dependence; difficulty providing public transport and essential infrastructures; city centre decline; greenfield sprawl and a higher carbon footprint than the EU average. To address these challenges, the preferred approach of the NPF is compact development that focuses on reusing previously developed, 'brownfield' land, building up infill sites, which may not have been built on before and either reusing or redeveloping existing sites and buildings.

The Assembly welcomes the updated text in the Draft First Revision which states that in order to understand compact growth trends, development must be monitored across cities and towns in a consistent way. The Draft First Revision states that a new approach to monitoring urban growth will be developed, focussing on the built-up footprint of existing settlements comprising areas that are subject to existing urban land uses and the additional 'land take' associated with development outside of the built-up footprint. It is further noted in the Draft First Revision that a tool is being developed to track and compare urban development trends across the main urban settlements, which is welcomed by the Assembly.

The Draft First Revision maintains a target to deliver at least half (50%) of all new homes that are targeted in the five cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints (NPO 8) and to deliver 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 (NPO 9). The 2018 NPF target to deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements (NPO 7) is also maintained, but with "*and ensure compact and sequential patterns of growth*" added to the objective, which is welcomed by the Assembly. A new NPO has been added in the Draft First Revision as follows:

- "*Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up area of the five cities or a metropolitan town.*" (NPO 10).

The addition of this new NPO is strongly welcomed by the Assembly given its potential to support effective regional development and the consolidation of existing settlements.

Table 2.1 of the NPF is updated in the Draft First Revision to provide a summary of the key national targets for 2022 to 2040, broken down by region. For the Eastern and Midland Region, targeted population growth is approximately 470,000 which would result in a total population of approximately 3 million people in the Region in 2040, an increase of 690,000 compared to 2016. For Dublin City and Suburbs, this would mean an increase of 295,000 people and a total population of 1.56 million by 2040. The table further states that the RSES is required to set out a strategic development framework for the Region, leading with the key role of Athlone in the Midlands and the Drogheda-Dundalk-Newry cross-border network. The Assembly will ensure that the revised RSES will be consistent with the objectives and targets of the NPF.

Translating the NPF to City and County Levels

Chapter 2.0 of the Draft First Revision includes a new section titled 'Translating the NPF to City and County Levels' (Section 2.7). This section identifies the need to ensure that the vision of the NPF is carried through from national, to regional and local level and that there is an effective process of alignment.

It is noted that an updated 'Implementation Roadmap' will be published to translate national and regional planned growth projections to city and county levels. This approach is welcomed by the Assembly, and we agree that the revised targets will support a plan-led approach to NPF implementation at regional and local level, allowing NPF growth objectives to be incorporated into city and county development plans as they are reviewed. In this regard, matters related to the targeted population and housing numbers and the estimated capacity of each settlement for growth will be determined at the plan-making stage, in accordance with the hierarchy of plans prescribed under the planning legislation, currently the Planning and Development Act 2000, as amended. Notwithstanding, the Assembly considers that the updated Implementation Roadmap should be published alongside the Draft First Revision and subject to public consultation as part of the revision process.

The Draft First Revision further states that planned growth at settlement level is to be reflected in the objectives of the statutory development plan, including land use zoning objectives, subject to an appropriate and proportionate element of flexibility in line with statutory guidelines, and will be required to have regard to matters such as appropriate densities to be applied, taking into account the particular circumstances and location.

Accordingly, while plan-led targets at settlement level will inform the plan-making process and thereby form the basis for decision-making, the Draft First Revision notes that consideration of individual development proposals on zoned and serviced development land subject to consenting processes under the Planning and Development Act will have regard to a broader set of considerations beyond the targets alone, including where there may be extant, but as yet unimplemented planning permissions. Further to the addition of this new section, a new NPO (NPO 11) is included in the Draft First Revision as follows:

- Planned growth at a settlement level shall be determined at development plan-making stage and addressed within the objectives of the plan. The consideration of individual development proposals on zoned and serviced development land subject of consenting processes under the Planning and Development Act shall have regard to a broader set of considerations beyond the targets including, in particular, the receiving capacity of the environment.

The Assembly recommends that NPO 11, which relates to planned growth at settlement level, should make specific reference to alignment with the Regional Spatial and Economic Strategies.

2.3 Effective Regional Development

Chapter 3.0 of the Draft First Revision, as in the NPF 2018, focuses on the role that the Regional Assemblies play in coordinating, promoting and supporting the strategic planning and sustainable development of the regions. This chapter recognises that the Regional Assemblies have a leadership role in identifying regional policies and coordinating initiatives that support the delivery and implementation of national planning policy, and in this respect, the Regional Spatial and Economic Strategies, is the primary vehicle of the Regional Assemblies in identifying regional policies and coordinating initiatives that support the implementation of the NPF and provide a greater level of focus around the NPOs and NSOs of the NPF. The significance of the National Smart Specialisation Strategy for Innovation 2022-2027 and the Regional Enterprise Plans, and their role in supporting effective regional development, is also recognised.

Section 3.1 of the Draft First Revision notes that the imperatives of meeting the decarbonisation targets heighten the importance of achieving more sustainable growth patterns in the regions and cities. It notes that within each region, the cities in particular play a key role in giving effect to the large-scale transition to net zero required by 2050 and can support a move towards reduced carbon living e.g. through better energy demand management and alternative energy solutions, sustainable mobility and lower carbon buildings. It further notes that regional development goals must also ensure a just transition to carbon neutrality, within the wider statutory framework of climate action, supporting alternative employment in place of traditional industries, and supporting persons and communities that may be negatively impacted by the transition. The Assembly welcomes this updated text in the Chapter which recognises an important role for the Regional Assemblies in setting regional development goals to meet decarbonisation targets and ensuring a just transition.

The Draft First Revision notes that a strengthening of institutional and governance arrangements to coordinate implementation of the NPF at national, regional and metropolitan levels, across all stakeholders involved, will be required if the strategy is to be delivered successfully. The broad range of stakeholders involved in delivering the social, community and ‘hard’ infrastructure elements required to facilitate transformative growth in metropolitan areas – including not just Regional Assemblies and county and city councils but also Government Departments and agencies such as Uisce Éireann, TII, NTA, OPW, port authorities - requires a level of coordination and interaction at the national, regional and metropolitan scale. The Assembly welcomes this recognition of the need for strengthened institutional and governance arrangements and enhanced coordination across local authorities and public bodies.

In this respect, as part of ongoing engagement with the OECD in collaboration with the Department of Housing, Local Government and Heritage, the Assembly facilitated the OECD Mission to explore and examine territorial attractiveness disparities and how national, regional and local policies and governance arrangements can lead to more ‘balanced regional attractiveness’. This resulted in the publication of an OECD Regional Development Paper titled [‘Towards Balanced Regional Attractiveness in Ireland: Enhancing the Delivery of the National Planning Framework.’](#) The OECD paper had three objectives as follows:

- i. to clarify the gaps in terms of regional attractiveness across and within Ireland’s regions, including in terms of population and investment attraction;
- ii. to assess the ability for the National Planning Framework – in its current form – to address these gaps, and
- iii. to consider what multi-level governance reforms and attractiveness policies can be introduced or scaled to generate more territorially-balanced development.

The study noted that Ireland is highly centralised and fast growing, creating co-ordination challenges in terms of delivering key investments and in key policy areas like transport, housing and education. It set out the important role of effective multi-level, metropolitan and city governance for balanced regional development and the consultation undertaken with key stakeholders and actors across levels of government identified a need for a more coordinated approach to the delivery of the NPF, the recognition of which in the Draft First Revision is welcomed by the Assembly.

Eastern and Midland Region

Section 3.2 of the Draft First Revision updates the **population projection** for the Eastern and Midland Region **for 2040 from 2.85 million people to 3 million people, at least half a million more people than today.** To accommodate the increase in population, the Draft First Revision reasserts that the Region’s most significant place-making challenge will be to plan and deliver future development in a way that enhances and reinforces its urban and rural structure and a move towards self-sustaining, rather than commuter driven activity, therefore allowing its various city, metropolitan, town, village

and rural components to play to their strengths, while above all, moving away from a sprawl-led development model. The Assembly welcomes this reassertion, as well as the recognition within the Draft First Revision that the Eastern and Midland Region is one of significant contrasts, encompassing Dublin and its wider commuting catchment, as well as the Region's more rural character, with variation both within the counties adjoining Dublin and between the Mid-Eastern counties and the Midlands.

In the section on the 'Mid-East' under Section 3.2 of the Draft First Revision, it notes that based on Census 2022 data, population growth in the Mid-East (counties Kildare, Meath and Wicklow) continues to be at more than twice the national growth rate. It is also recognised that Dublin-based workers are now commuting longer distances into the Mid-East area, enabled by an increase in hybrid and remote working, thereby extending the economic reach of Dublin. The Draft First Revision reasserts that in the wider Mid-East, the rapid growth experienced by many towns in recent decades was mainly driven by housing, rather than jobs-centred development and an integrated approach to the development of these and similar towns is a priority, playing to local strengths and securing employment opportunities to drive self-sustaining, rather than mainly housing-led development. In this respect a greater focus is required to address employment creation, local infrastructure needs, including in particular social and community infrastructure in areas such as education and amenity, and addressing the legacy of rapid growth. This means that housing development should be infrastructure-led and primarily based on employment growth, accessibility by sustainable transport modes and quality of life, rather than unsustainable commuting patterns. Direct recognition of these dynamics and the stated need for an integrated approach to development is welcomed by the Assembly. The Assembly also welcomes in particular the additional emphasis on social and community infrastructure and infrastructure-led housing development.

In the section on the 'Midlands' under Section 3.2 of the Draft First Revision, as in the 2018 NPF, it highlights that the counties in the Midland area (counties Laois, Longford, Offaly and Westmeath) have experienced substantial population growth at an unsustainable rate in some settlements, while others have experienced decline. The Draft First Revision documents the strategic importance of the area owing to its central geographic location, with particular reference to Athlone and its influence that extends to part of all three Regional Assembly areas. It further notes that the strategic location and scale of population, employment and services in Athlone are recognised in the Regional Spatial and Economic Strategies for the Eastern and Midland and Northern and Western Regional Assembly areas. The Assembly welcomes the recognition of these interdependencies and specific reference to same in the RSEs. Notwithstanding, the Assembly considers that this text should more directly address the intraregional imbalance within the Eastern and Midland Region, whereby the Midland area is currently facing additional economic challenges, including those linked to the just transition process.

In the section on 'Louth/North-East' under Section 3.2 of the Draft First Revision, it notes that the Dublin-Belfast cross-border network, focused on Drogheda, Dundalk and Newry is the key driver for this regional area. It further notes that the important regional role of Dundalk and Drogheda is recognised in the Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly area and the need to prepare co-ordinated strategies for Dundalk and Drogheda. The Assembly welcomes the reference to the RSEs in the Draft First Revision.

Section 3.2 of the Draft First Revision also sets out key future planning and development and place-making policy priorities for the Eastern and Midland Region. While these remain broadly the same as those included in the NPF 2018, there have been a number of amendments. In this respect, the identification and prioritisation of infrastructure is added as a particular focus in relation to the

consolidation of the development of places that grew rapidly in the past decade or so with large scale commuter driven housing development. The Assembly welcomes this additional text.

Furthermore, the Assembly notes that the NPF 2018 priority on preparing and implementing a regional priorities programme, to shape and inform delivery of the Regeneration and Development Initiative, has been removed in its entirety from the Draft First Revision. The Assembly considers that the Draft First Revision should include an updated provision to support the preparation and implementation of a regional priorities programme to shape and inform delivery of ongoing and future initiatives which support the delivery of future development in a way that enhances and reinforces its urban and rural structure and a move towards self-sustaining, rather than commuter driven activity.

Regarding the potential of the Region in renewable energy terms, the Draft First Revision updates the text of this priority by cross-referencing the capacity allocation targets set out in Chapter 9: Climate Transition and Our Environment and rationalises the text regarding support for a managed transition of local economies to greener energy. See Section 2.9 of this submission in relation to this.

The Assembly notes that the 'Old Rail Trail Greenway' between Athlone and Mullingar has been included as a case study at the end of this sub-section on page 30. While the Assembly recognises this greenway as a positive place-making development, no context is provided in relation to the relevance of the case study other than a brief description of the greenway. There is substantial text included within the information box, however this is not at a resolution which is accessible or readable. The Assembly is of the view that this page should be reviewed in its entirety to provide a legible and well-described case study, and providing context as to its relevance.

The text in relation to the 'Dublin City and Metropolitan Area' in Section 3.2 of the 2018 NPF has been substantially updated in the Draft First Revision. The Assembly strongly welcomes the addition of the headline statement within the section stating that the continued performance of Dublin as a high-quality international city of scale is critical to Ireland's overall competitiveness. The Assembly further welcomes the recognition within the text that Dublin is experiencing challenges in relation to housing delivery and affordability, transport and sustainable mobility, and urban amenities and livability. The revised text notes the requirement for continued focus on a number of large regeneration and redevelopment projects within the existing built-up area and a more compact urban form, facilitated through well designed higher density development, which is also welcomed by the Assembly. The Draft First Revision further notes that significant development will be required, on sites that can be integrated into the existing built-up area of the city and that are serviced by existing or planned high-capacity public transport, with a focus on large-scale brownfield and greenfield Transport Orientated Development (TOD) opportunities, particularly along high-capacity rail corridors. The Assembly strongly welcomes this focus on TOD. The Draft First Revision states that there are significant opportunities within the Dublin metropolitan area, and further opportunities can come forward for development in the period to 2040, in conjunction with planned investment in the public transport network. In this context the Assembly strongly welcomes the direct reference to the identification of strategic development areas and corridors in the RSES and city and county development plans.

The Draft First Revision notes that the future growth of Dublin requires a holistic approach to ensure that residential and employment development is better integrated and served by transport, infrastructure and amenities. It also means ensuring that smaller scale opportunities for infill and brownfield development are supported and incentivised in order to be realised. The Assembly welcomes this approach which is underpinned by the principles of compact urban growth and TOD.

Finally, the Draft First Revision states that the delivery of critical strategic infrastructure in areas such as transport, water, education, health and community services is essential to the sustainable growth of Dublin into the future. It outlines key priorities including enhanced airport and port access and capacity; expansion of the public transport network including the delivery of DART+, MetroLink, Luas expansion and BusConnects; and enhanced water and wastewater capacity through projects such as the Greater Dublin Drainage Project and the Eastern and Midlands Water Supply Project. While the Assembly welcomes the strong recognition that improving strategic infrastructure is required to sustain growth, the Draft First Revision excludes the direct reference to the role of the Dublin MASP, a reference that was included in the 2018 NPF. The Assembly suggests that the MASP and its coordinating role should be referenced in this location.

This section of the Draft First Revision includes the City Edge Project, Dublin, as a case study. While the Assembly strongly supports the City Edge Project as a large-scale initiative to reimagine the Naas Road, Ballymount and Park West areas of Dublin as a new urban quarter with climate resilience at its core, this project remains at a relatively early stage of development, with a strategic framework in place, but no plan prepared or approved at present. The Assembly considers that future advancement of this project will be transformative, but its inclusion as a case study of good or best practice in the National Planning Framework is perhaps somewhat premature and should be reconsidered. The inclusion of a similar initiative which is at a more advanced stage of implementation would be welcomed by the Assembly, for example, Cherrywood, Co. Dublin, of which a plan is in place and the lands are at advanced construction stage.

Section 3.2 of the Draft First Revision sets out key future growth enablers for Dublin. While these remain broadly the same as those included in NPF 2018, there have been a number of amendments. For example, the text in the NPF 2018 stating *“Progressing the sustainable development of new greenfield areas for housing especially those on public transport corridors, such as Adamstown, Cherrywood, Clonburriss and Clongriffin”* has been replaced in the Draft First Revision with *“Progressing the sustainable development of new brownfield and greenfield areas for housing along existing and planned high capacity public transport corridors focusing on large-scale Transport Orientated Development (TOD) opportunities particularly along high- capacity rail corridors within the metropolitan area”*. The Assembly welcomes the greater focus on brownfield development and TOD in the Draft First Revision.

Furthermore, the Assembly welcomes the updated text relating to the delivery of key transport projects which now reads as *“Delivering the key transport projects set out in the Transport Strategy for the Greater Dublin Area including DART+, MetroLink, Luas expansion, BusConnects Dublin and key elements of the metropolitan area cycle network, inclusive of commuter routes and urban greenways”*.

In addition, the Assembly welcomes the updates in relation to key water supply and wastewater projects; linkages of green and blue spaces with City and County Biodiversity Action plans; and measures facilitating the growth of Dublin Port.

2.4 Making Stronger Urban Places

Chapter 4.0 of the Draft First Revision ‘Making Stronger Urban Places’ includes a number of updates to the 2018 NPF which are outlined hereunder.

Why Urban Places Matter

With respect to the Economy/Prosperity section under Section 4.1 of the Draft First Revision, the updated text notes that *“the quality and attractiveness of our urban places is a critical factor for inward*

investment and talent attraction". This additional text is welcomed by the Assembly as it reflects the findings of the recent OECD research on balanced regional attractiveness published in 2023 (See Section 2.3 of this submission) which noted the importance of high-quality regional governance and the need to enhance multi-level governance and coordination mechanisms.

With respect to 'The Environment' section under Section 4.1 of the Draft First Revision, additional text is included which notes that compact development will reduce harmful impacts on the environment by improving the viability of sustainable and electric mobility infrastructure and improving the provision and viability of water services. The text is also updated to note that sustainable and efficient movement, a mix and distribution of uses, the protection and enhancement of green and blue infrastructure and responsive built form can help to enhance our urban areas and create desirable places in which people want to live, work or visit and contribute to ongoing quality of life and well-being. The Assembly welcomes these additions which take account of developments since the 2018 NPF.

Ireland's Urban Structure

Section 4.2 of the Draft First Revision has updated the population statistics to take account of the 2022 Census. Furthermore, the Draft First Revision makes explicit reference to the influence of place of employment on settlement patterns and notes that many of Ireland's largest towns (measured in terms of population), while economically active in their own right, function as commuter settlements for employees working in Dublin (and have a low ratio of jobs to residential workforce). The Assembly welcomes these updates in the Draft First Revision as they highlight important population, settlement and employment dynamics in the Dublin and Mid-East areas.

Planning for Ireland's Urban Growth

Section 4.3 of the Draft First Revision updates NPF 2018 in referencing the need to strengthen the urban structure in the Midlands area and to enhance cross border networks as part of a tailored approach to achieve NPF objectives, which is welcomed by the Assembly.

Section 4.3 of the Draft First Revision also updates the wording of NPO 15, which recognises the need to encourage population growth in strong employment and services centres, supported by employment growth, including Key Towns, the future growth of these towns being determined at a regional level. The Assembly welcomes this added emphasis and continued recognition within the Draft First Revision of the role of the Regional Assemblies, through their RSEs, in relation to Key Towns and their designation, however, while the narrative under the subsection 'Ireland's Towns' refers to the inclusion of Key Towns in NPO 15, it is noted by the Assembly that this has not been included in the wording of the NPO, and the Assembly recommends its inclusion for consistency.

While 'Key Towns' are referred to in Section 4.3 of the Draft First Revision, they are not clearly defined within the Draft First Revision. As set out in the Planning and Development Bill 2023, "key town" means a settlement that has been identified and designated as a key town in a regional spatial and economic strategy in accordance with Section 29 (8). Section 29 (9) of the Planning and Development Bill 2023 notes that a key town is a large, economically active settlement that provides employment and services for its surrounding area and has the capacity to complement a regional growth centre. In the RSEs for the Eastern and Midland Region, there are ten Key Towns (Swords, Maynooth, Bray, Navan, Naas, Wicklow, Longford, Mullingar, Tullamore and Portlaoise) that provide employment and services to their surrounding areas. The Assembly considers that the revised NPF should clearly set out the important role of Key Towns at Section 4.3 and is updated to include an NPO in support of same which complements NPOs 15 and 17 in the Draft First Revision.

This section of the Draft First Revision also notes that due to Dublin's scale, achievement of the targeted growth rate for **Dublin City and suburbs (20-25%) means planning for at least 296,000 more people in the city and suburbs by 2040**, which include new sustainable communities at brownfield and greenfield locations along planned high-capacity public transport corridors in the post-2030 period. The Assembly welcomes the revised population growth targets to 2040 as set out in Table 4.1 of the Draft First Revision. Notwithstanding this, the Assembly has serious concerns regarding the implementation of these targeted growth rates, particularly within the Dublin MASP area. As highlighted under Section 1.4 of the Draft First Revision, a recommendation of the 2023 Expert Group Review of the 2018 NPF, and a recommendation of the OECD Regional Development Paper '[Towards Balanced Regional Attractiveness in Ireland: Enhancing the Delivery of the National Planning Framework](#)' is the need for statutory support mechanisms relating to governance and institutional structures for MASP delivery. Currently the Assembly oversees and drives implementation of the Dublin MASP 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 mechanism relating to MASP implementation, that enables the Regional Assemblies to coordinate and prioritise MASP implementation with key stakeholders, would be particularly beneficial in this regard.

Planning for Urban Employment Growth

Section 4.4 of the Draft First Revision recognises that the pattern of urban growth targeted in the NPF is population and employment led, recognising that firms and enterprise development are drawn to urban locations by market forces such as agglomeration, migration and specialisation that depend on factors such as scale, accessibility, innovation supported by higher education institutions and quality of life.

Further to this, the list of factors for consideration for the accommodation of strategic employment growth at regional, metropolitan and local levels has been updated to include:

- Lands with high levels of public transport accessibility, including areas identified with potential for Transport Orientated Development (TOD);
- The size and scale of a settlement which will inform its capacity to accommodate enterprise development of appropriate scale;
- Locations for expansion of existing enterprises including availability of light industrial space for small business to scale.

The Assembly welcomes the inclusion of these additional factors which are considered crucial for sustainable and balanced regional development.

A significant update of relevance to the Regional Assemblies is the addition of text in relation to 'smart specialisation' and 'clustering'. 'Smart specialisation' and 'clustering' policy provides an opportunity to build on local distinctiveness and regional strengths. As set out in the Draft Revision, smart specialisation is a place-based innovation policy, aimed at promoting regional innovation and economic transformation by helping regions to focus on their key sectoral strengths. This may include unique characteristics or capabilities that provide advantages to that region in certain sectors. It requires higher education, research organisations and business, along with government departments and agencies, to identify these strengths, build on competitive advantages and prioritise support based on where local potential and market opportunities lie. This aligns with the NPF's focus on cities and regional centres as key drivers of sustainable growth, which is central to the ongoing work of the Regional Assemblies. Smart specialisation also strengthens the relationship between the nine Regional

Enterprise Plans (prepared by the Department of Enterprise, Trade and Employment), the Regional Spatial and Economic Strategies, and national enterprise and innovation policy.

The Draft First Revision further notes that the Department of Enterprise, Trade and Employment intends to devise and introduce a centrally coordinated, cross-Government approach to clustering in 2024 that will encourage the formation and strengthening of national cluster organisations, leveraging the benefits of proximity and co-location to boost productivity. The identification of priority areas for enhanced clustering will be underpinned by an assessment of competitive strengths and potential opportunities against a range of factors, including the scale of potential impact, innovation intensity and research capability, as well as market direction.

The Assembly strongly welcomes the addition of the additional text in this section. Notwithstanding, the Assembly notes the absence of any NPOs relating to ‘smart specialisation’ or ‘clustering’ within the Draft First Revision and recommends the inclusion of same.

Furthermore, regarding NPO 18 and NPO 19 which are discussed in Section 4.4 of the Draft First Revision, the Assembly notes that the term “*Regional and Local Authorities*” is used in the wording of these NPOs. The Assembly requests that this is changed to “*Regional Assemblies and Local Authorities*” which is more precise and prevents the possibility of confusion with other bodies and authorities which have a regional remit.

Achieving Urban Infill/ Brownfield Development

As in the 2018 NPF, Section 4.5 of the Draft First Revision targets a significant proportion of future urban development on infill/brownfield development sites within the built footprint of existing urban areas. This is applicable to all scales of settlement, from the largest city, to the smallest village.

A number of additions and amendments have been made to this section including reference to land activation measures such as the Residential Zoned Land Tax and reference to proposals to introduce Land Value Sharing measures to facilitate the active management of development land. The section also now references the Urban Regeneration and Development Fund (URDF) which has part-funded regeneration and rejuvenation projects in Ireland’s five cities and other large towns, as well as the establishment of the Land Development Agency. In this respect, NPO 21 updates NPO 10a of the 2018 NPF. Additional text has also been included which states that more compact and sustainable development involves a greater proportion of residential and mixed-use development within the existing built-up footprints of our cities and towns with a view to ensuring that more parts of urban areas become attractive and vibrant places in which to live, work, visit and invest.

In relation to performance-based design standards, the Draft First Revision has been updated to note that general restrictions on building height or universal standards for car parking, separation distances or garden size may not be applicable in all circumstances in urban areas and should be replaced by performance-based criteria appropriate to general location, e.g. city/ town/ village centre, urban neighbourhood, public transport interchange, suburban or edge location etc. The NPF 2018 text is further updated to note that the Urban Development and Building Height Guidelines issued in 2018 and the Sustainable Residential Development and Compact Settlements Guidelines issued in 2024 under Section 28 of the Planning and Development Act 2000 (as amended), provide detailed guidance and standards in support of NPO 22.

The Assembly welcomes these additions and amendments which support compact and sustainable development of infill/brownfield development sites. The Assembly also welcomes the inclusion of two illustrative case studies in this section. Notwithstanding, while the relevant Regional Spatial and Economic Strategy (RSES) is referenced in the text of the ‘Urban Regeneration and Development –

Sligo Town’ case study, no such reference is made in the text of the ‘Shanganagh Castle – Land Development Agency’ case study. The Assembly requests that the text of the latter case study is updated to note that Woodbrook–Shanganagh is located on the North-South Corridor (DART expansion) which is identified as a strategic development corridor in the Dublin Metropolitan Area Strategic Plan (MASP) of the RSES for the Eastern and Midland Region. Furthermore, the Assembly recommends that, to ensure the achievement of well-designed high-quality outcomes is supported, the NPF could be strengthened by providing further detail in relation to the performance criteria referenced in NPO 22.

2.5 Planning for Diverse Rural Places

As in the 2018 NPF, the Draft First Revision recognises that rural areas make a major contribution to Ireland’s identity and to overall national development in economic, social, cultural and environmental terms, which is welcomed by the Assembly.

Why Rural Places Matter

The updated text in Section 5.1 of the Draft First Revision notes that the agri-food and tourism sectors, which are particularly important for rural economies, employ in excess of 430,000 people (18% of the national workforce). The text of the Draft First Revision has been further updated to reflect the publication of complementary policies including the Government’s rural development policy ‘Our Rural Future 2021-2025’ and ‘Our Living Islands: the National Islands Policy 2023-2033’, both which were published by the Department of Rural and Community Development (DRCD).

The Draft First Revision notes that ‘Our Rural Future’ sets out a vision for a thriving rural Ireland which is built on the talent, skills and creativity of people in rural communities, on the importance of vibrant and lived-in rural places and on the potential to create quality jobs and sustain our shared environment. The Framework recognises that towns and villages are at the heart of social and economic activity in rural Ireland. The regeneration, repopulation and development of rural towns and villages is therefore a key policy focus, particularly in relation to the reuse of vacant properties. To this end, the Draft First Revision notes that policy measures are being implemented in order to optimise digital connectivity, support employment, revitalise rural towns and villages, enhance participation, leadership and resilience in rural communities, enhance public services, transition to a climate neutral society, support the agriculture, marine and forestry sectors in a sustainable manner, and support Islands and coastal communities. NPO 23 has also been updated in this respect to include a commitment that any successor policy documents relating to national policy for rural areas and the islands will ensure continued alignment and consistency with the National Policy Objectives of this Framework.

The Assembly welcomes these amendments and additions which recognise the importance of policy alignment across Government to deliver on the aims and objectives of the NPF.

Strengthening Ireland’s Rural Fabric and Supporting Rural Communities

Section 5.2 of the Draft First Revision has updated the 2018 NPF to include a commitment by Government to provide all citizens with reliable and realistic sustainable mobility options, and public transport plays a key role in the delivery of this goal particularly for rural communities and older citizens living in more remote areas. The text has been updated to note that the Department of Transport has established the Connecting Ireland Rural Mobility Plan where over 100 rural villages will benefit from frequent public transport service (at least three return trips daily) for the first time. The Draft First Revision further notes that the Mobility Plan will also see a 25% overall increase in rural bus services, and over 60 new connections to regional cities from surrounding areas. It is stated that

Transport for Ireland (TFI) Local Link continues to be provided to address rural social exclusion, and funding for TFI Local Link has increased from €12 million in 2016 to €57 million in 2023 with passenger numbers increasing from 1.76 million passengers in 2015 to 3.2 million in 2023.

The Assembly welcomes this commitment by Government and the increased focus on sustainable mobility and public transport in rural areas. This is strongly supportive of the Assembly's work in delivering the Smart and Sustainable Mobility Accelerator (SSMA) programme which aims to support local authorities and stakeholders in the Region to design and implement smart and sustainable mobility projects under the National Sustainable Mobility Policy (SMP) Action Plan 2022-2025. It is further supportive of Priority 3 of the EU Just Transition Fund Programme in providing former peat communities with smart and sustainable mobility options to enable them to benefit directly from the green transition.

Planning for the Future Growth and Development of Rural Areas

Section 5.3 of the Draft First Revision updates the text of the 2018 NPF in relation to building vacancy in rural towns and villages. Specifically, it notes that one of the key objectives of *Our Rural Future* is revitalising rural towns and villages by investing in projects which support economic activity, increasing footfall, encouraging town centre living and combatting vacancy and dereliction. It further notes that 'Town Centre First - A Policy Approach for Irish Towns' provides a co-ordinated, whole-of-government policy framework to proactively address the decline in the health of towns across Ireland and supports measures to regenerate and revitalise them. It highlights how re-use and regeneration of vacant and derelict buildings can be an essential catalyst to transforming the capacity and potential of smaller towns in Ireland.

The Assembly welcomes these updates and the focus on investment in projects which support economic activity and re-use and regeneration of vacant and derelict buildings. The inclusion of the Boyle Regeneration project as a case study is a useful illustrative example. The Draft Revision notes that a new package of supports will be launched in 2024 to expand on the delivery of the objectives within Town Centre First. The Draft First Revision also references other schemes and supports in addition to the Rural Regeneration Development Fund (RRDF) including the Town and Village Renewal Scheme (TVRS); the targeted schemes under the Vacant Homes Action Plan and the Ready to Build Scheme. Notwithstanding, the text should be further updated in relation to the referenced package of supports to be launched in 2024 in order to, as much as is possible, future-proof the Draft Revision to 2040 and ensure that all information is current at the time of publication. Furthermore, the Assembly notes that the Draft First Revision does not reference the Town Centre First Heritage Revival Scheme (THRIVE), which is managed by the two ERDF Managing Authorities – the Southern Regional Assembly and the Northern and Western Regional Assembly. THRIVE is targeted at larger urban settlements – cities, regional growth centres and key towns – and is designed to complement other national funds targeting smaller urban settlements. It is a competitive funding call and with 100% grant aid available

In relation to the countryside, the text of the Draft First Revision now references energy, inland waterways, marine and tourism in addition to the traditional agriculture and forestry sectors, as well as the importance of protecting the capacity of the receiving environment. The Assembly welcomes the recognition of wider sectors for rural communities and economies, and also the need to protect the capacity of the receiving environment.

Planning and Investment to Support Rural Job Creation

Section 5.4 of the Draft First Revision reasserts that creating the environment to support job creation in rural areas will be a key enabler to rejuvenating rural towns and villages, sustaining vibrant rural communities and addressing population decline. It updates the 2018 NPF by stating that advances in technology and improvements in connectivity, particularly in rural areas, have changed how we live and work, opening up new opportunities through enhanced access to education, goods and services. It further states that broadband is essential enabling infrastructure that affords rural communities the same opportunities to engage with the digital economy as it does to those who live in our cities and towns.

The Draft First Revision also notes that alignment between remote working hubs, the development of electric vehicle charging, walking and cycling infrastructure, and town centre regeneration, health promotion and community volunteerism also present great opportunities to rural development.

In addition, the Draft First Revision includes specific reference to the bioeconomy as having a key role in rural economic development and noting the importance of developing a strong enterprise and innovation culture for the economic and societal vibrancy of rural communities as underlined by the National Smart Specialisation Strategy for Innovation 2022-2027. Throughout this section, the text is updated to require that the development of the rural economy is done in a manner consistent with the national climate objective and with regard to biodiversity loss. The Draft First Revision is updated to reference the Food Vision 2030 Strategy (Agriculture); the Forest Strategy and Implementation Plan, including the Forestry Programme 2023- 2027 (Forestry); Strategy for the Future Development of National and Regional Greenways (Tourism) and NPOs have been updated accordingly.

The Assembly strongly welcomes these updates which are supportive of the work the Assembly has undertaken through independent research, participation in European projects and is supporting through management of the EU Just Transition Fund.

In October 2020, the three Regional Assemblies published the Regional Co-Working Analysis, the purpose of which was to provide data, analysis and recommendations to assist in developing the potential of remote working in our regions. The analysis identified the number of private sector workers that can operate remotely on a national, regional and local authority basis, as of Q2 2020, as well as the name, location and type of co-working hubs in each local authority in Ireland, as of September 2020.

Through participation on the Interreg Europe Next2Met project, the Assembly, in consultation with key stakeholders across the public and private sectors, has developed a [Regional Digitalisation Roadmap for the Midlands](#). This mid- to long-term roadmap focuses on enabling a digital ecosystem in the Midland region. The new framework aligns at a regional level with national and local strategies, and builds on EU best practices. With this additional lens providing greater focus to digital solutions in the Midlands, key Regional Planning Objectives of the RSES are strengthened in their implementation for better quality of life and improved investment opportunities in the Region.

Through participation in the Interreg Europe ORIGINN project (which is ongoing), the Assembly is working to promote the economic and social transformation of rural areas through innovation, with a particular focus on the agri-food sector. Areas of thematic focus are digitalisation, industrial sustainability, social innovation, and soft innovation. Insights drawn from the project will inform the review of the RSES, to ensure that policies for innovative social and economic transformation in the Midlands reflect the needs and the potential of the region.

Furthermore, the EU Just Transition Fund, which is managed by the Assembly, is supporting the diversification of the local economy in the EU JTF Territory, with a particular focus on the development of the regenerative tourism sector, supporting the implementation of local and regional economic strategies and supporting research, development and innovation in the bioeconomy sector, as well as supporting the installation of publicly available Electric Vehicle (EV) charge point infrastructure at community centre sites.

Rural Investment Coordination

Section 5.5 of the Draft First Revision notes that investment coordination, together with research and innovation coordination, is an important issue to prevent duplication of effort and inefficient use of resources. It recognises that rural development is a multifaceted policy area and accordingly there are several funding and investment structures that exist to support national, regional and local priorities. The NPF 2018 text is updated to reference new plans and schemes which have been established since 2018 including Ireland's Common Agricultural Policy Strategic Plan 2023 – 2027 (for which the Assembly is represented on the Monitoring Committee); the Rural and Urban Regeneration and Development Funds (RRDF/URDF); the CLÁR programme; the Town and Village Renewal Scheme (TVRS); the Croí Cónaithe Towns Fund; the continued rollout of LEADER; the Built Heritage Investment Scheme; the Historic Structure Fund, and; the Community Monuments Fund. An illustrative case study of RRDF funding is also included in the Draft First Revision (Ireland's Global Garden - Mount Congreve Estate, Co. Waterford). The Assembly welcomes these updates and additions. Notwithstanding, the Assembly notes that the reference to the RRDF fifth call in early 2024 is written in the future tense, despite predating the Draft First Revision. The Department should ensure that, as much as possible, the document is future-proofed. Furthermore, this section does not reference the EU Just Transition Fund or any of its schemes, all of which focus on promoting a balanced socio-economic transition in the wider-Midlands region. This includes the Fáilte Ireland Regenerative Tourism and Placemaking Scheme for Ireland's Midlands 2023-2026. Through this scheme, Fáilte Ireland will invest in the sustainable development of tourism in the Midlands with the aim of diversifying the regional economy by creating jobs, supporting habitats and biodiversity and sustaining communities. In addition, as highlighted under Section 2.5 of this submission (and for inclusion in Section 5.3 of the Draft First Revision), reference to the Town Centre First Heritage Revival Scheme (THRIVE) would also be appropriate at this location.

2.6 People, Homes and Communities

Chapter 6.0 of the Draft First Revision retains broadly the same structure and content of NPF 2018, with updated text to account for particular changes which have taken place since 2018.

Section 6.2 'Healthy Communities' now references Sláintecare and notes that well connected neighbourhoods with services and amenities within a short walk or cycle of homes supports physical activity, which is welcomed by the Assembly. The Assembly notes the NTA's Best Practice Guide on Permeability in Existing Urban Areas (2015) and considers that the text of NPO 38 should be updated to give effect to best practice design for national and regional strategic objectives. The Assembly recommends that the text of NPO 38 should be amended to reference the term 'filtered permeability' as defined in the NTA's Best Practice Guide on Permeability in Existing Urban Areas (2015) and as referenced in Section 8.8 of the Greater Dublin Area Transport Strategy 2022-2042. That is, the Assembly strongly recommends that NPO 38 should be updated to read: *"Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility, including filtered permeability, to both existing and proposed developments and integrating physical activity facilities for all ages."*

Section 6.3 'Diverse and Inclusive Ireland' updates statistics in relation to people with disabilities, the travelling community and updates the text in relation to the Irish Language and the Gaeltacht (including making reference to Gaeltacht Service Towns).

Section 6.4 'Age Friendly Communities' has been substantially updated with additional text recognising that increase in population (based on updated ESRI projections) coupled with an ageing society will have implications for the health sector and the services required to facilitate this demographic to 2040. The associated NPO (NPO 41) has also been updated to reference health facilities and services and an illustrative case study has been included in relation to social housing development on town centre sites (Social Housing Architectural Competition) as a model which could support independent living for older people. The ESRI projections in relation to children and young people identify a clear need for ongoing investment in facilities and amenities for children and young people, such as early learning and childcare services, schools, playgrounds, parks and sportsgrounds. The Assembly welcomes these updates.

Section 6.5 'Childcare, Education and Life Long Learning' has been updated with a greater emphasis on early learning. The Assembly welcomes additional text noting the potential of infill and brownfield housing development in existing settlements to increase capacity and enable existing services to meet regulatory and quality requirements. The Assembly further welcomes the additional text noting that the Department of Children, Equality, Disability, Integration and Youth (DCEDIY) are developing capacity in evidence-based forward planning to monitor, analyse and forecast early learning and childcare demand and supply in order to identify areas of mismatch and develop approaches to best meet needs, including through capital investment. The Assembly further welcomes the proposed collaboration between DCEDIY and the Department of Housing, Local Government and Heritage and local authorities to ensure appropriate levels of early learning and childcare provision are accessible to families as an integral element of the overall development process.

In relation to education, the Assembly welcomes the elaborated text which notes that schools play a vital role within the development of sustainable communities, acting as a key enabler for housing development, and therefore the integration of education and land use planning and delivery needs to be undertaken in a coordinated and strategic manner in order to avoid pressure on school places, which in turn may prevent housing development from taking place. The Assembly further notes the additional recognition within the Draft First Revision that school place requirements are driven by local area demographics and the continued need for new schools and additional school places in high growth areas. The Assembly welcomes the addition of text recognising the importance of the provision of appropriate school places (and associated services) for children with special educational needs and the role of school premises in accommodating facilities such as crèches, childcare facilities or pre-school services, as well as sporting and general-purpose facilities beyond the provision of education.

Regarding further and higher education, the Draft First Revision notes the enactment of the Technological Universities Act in March 2018. The Assembly strongly welcomes the specific recognition of the role of the new technical universities in supporting the promotion of research, knowledge and innovation and the development of regional clusters as key anchors for sustainable regions.

Housing

Section 6.6 'Housing' of the 2018 NPF has been updated in the Draft First Revision to reference Housing for All, the Government's Housing Plan for Ireland to 2030, and the housing delivery target in the relevant NPO (NPO 43) has been updated to **approximately 50,000 additional households per annum to 2040**. The creation of sustainable communities with a diversity of housing choice has been

added to the list of high-level policy priorities in the housing sector to 2040, as well as reference to the role of Ireland's future homes in supporting the transition to a lower carbon society. This is welcomed by the Assembly. The text has been further updated to reference the introduction of the Residential Zoned Land Tax in 2021, noting that the mapping process, which can facilitate the monitoring of land from the point of zoning to development, and the identification of lands that require investment in infrastructure to enable housing development, is welcomed by the Assembly.

The Assembly recognises that the provision of affordable, appropriate and adaptable accommodation is a key challenge facing the State and the Region. In addition to the location of housing needing to reflect the strategic outcomes and policy objectives of the NPF, it also needs to be provided based on a rigorous assessment of housing need. Housing quality is also important in order to secure positive health outcomes. The current RSES sets out an asset-based approach to the strategic location of residential development in the Region, targeting significant population growth in Dublin and the Regional Growth Centres, supported by balanced population and employment growth in Key Towns and a limited number of economically active Self-Sustaining Growth Towns. Other towns will require targeted 'catch-up' investment to enhance local employment and services, for example, in rapidly growing commuter towns or to promote regeneration in rural towns and villages. In applying a tailored approach to the location of new housing and urban development, investment needs can be linked to the NPF/NDP Urban and Rural Regeneration and Development Funds.

In relation to building resilience in housing, text has been added to the Draft First Revision to support the adaptive reuse of existing stock, as well as noting an increase in remote and hybrid working since the COVID-19 pandemic allowing more people to work from home. Text has also been added to further support compact and high and medium density housing in urban areas and appropriate locations, with direct reference to the Sustainable Residential Development and Compact Settlements Guidelines issued as Ministerial Guidelines in January 2024. These guidelines demonstrate how higher densities and more compact and sustainable settlement patterns can be achieved through the interaction of residential density, flexible housing standards and quality design and placemaking.

The section on social housing in the NPF 2018 has been updated in the Draft First Revision to refer to social 'and affordable' housing and notes the preparation by local authorities of Housing Delivery Action Plans since 2022 which assist in the identification of the quantum of homes required to be constructed and the land available for such construction. New sub-sections have also been included in relation to residential vacancy (referencing a number of schemes and grants), homelessness (provisions in Housing for All) and updated statistics and text for changing family size and student accommodation (noting that adaptive reuse of existing buildings and brownfield sites for student accommodation can assist with the reduction of vacancy and dereliction, thereby promoting vitality and vibrancy in settlements, in support of Town Centre First principles). A number of case studies are also included in the Draft First Revision including infill social housing development at Riverside Cottages, Templeogue; regenerative City Centre consolidation and infill at Merchants Road Lower, Galway City, and; an infill, affordable apartment scheme at Curragower Corner, Limerick. While the latter two case studies include explanatory text, the Riverside Cottages case study does not. The Assembly considers that the inclusion of explanatory text would add value to this case study.

This section has been updated to reference the Affordable Housing Act 2021, as well as a range of funding schemes to support the delivery of affordable housing, including the affordable purchase shared-equity First Home scheme for new-build homes in private developments, a new Local Authority-led Affordable Purchase Scheme and a newly expanded Local Authority Home Loan Scheme. The Draft First Revision further notes that the Land Development Agency (LDA) has taken a leading role in the delivery of affordable housing on public land alongside new initiatives, such as Project

Tosaigh, and that funding is being provided to ensure that local authorities can provide homeless prevention services, emergency accommodation and other services to ensure people can exit homelessness to tenancies as quickly as possible. It also references the Housing First National Implementation Plan for 2022-2026 which provides for an additional 1,319 supported Housing First tenancies over this period for people who have complex additional needs. The section also updates the text in relation to Housing Need Demand Assessment (HNDA) which informs NPO 48.

The Assembly welcomes these updates given the need for accelerated delivery of housing, particularly in Dublin and in identified growth settlements in the Region to ensure the development of high quality and affordable homes located within sustainable communities in order to meet the existing and future needs of a growing population. Notwithstanding, taking Section 29(1)(d) of the Planning and Development Bill 2023 into consideration that requires that the RSEs of the Regional Assemblies shall make provision for the location of housing, including provision to meet any national and regional population growth targets set out in the NPF, the Assembly considers that this section should be strengthened through the acknowledgement of the future role of Regional Assemblies in making provision for the location of housing and would welcome further clarity regarding any potential role for Regional Assemblies in informing the HNDA process.

2.7 Realising our Island and Marine Potential

As terrestrial and marine ecosystems are closely connected, the Regional Assemblies and the coastal local authorities have an important role in ensuring integration of land and marine planning within the Region and with Northern Ireland to ensure that management of coasts and marine waters is on an all-island basis.

Integrated Land and Maritime Planning

Section 7.1 of the NPF 2018 has been updated substantially to take account of the publication of the National Marine Planning Framework (NMPF), the overarching strategic plan for the entire maritime area. The Draft First Revision notes that there are many shared aims and overlapping areas of co-ordination and activity between terrestrial and maritime area planning, including the development of renewable energy and associated green industrial development, supporting the improvement of port infrastructure, tourism and environmental co-ordination. Figure 7.1 of the Draft First Revision identifies these common aims and areas of overlap for coordination. Furthermore Figure 7.2 includes a table to demonstrate relationships between planning policy and maritime policy at national, regional and local levels, including the Regional Spatial and Economic Strategies. This has been updated to include reference to Designated Maritime Area Plans (DMAPs) at the regional tier and updates in relation to localised land-sea interactions in relation to the nearshore at the local level.

While the Assembly welcomes the inclusion of this table, the flow of relationships between planning policy and maritime policy is not clear, particularly regarding the role of the Regional Assemblies in relation to DMAPs and maritime policy more generally. This includes clarity relating to the key organisation(s) and/or agency or agencies that may potentially be designated as a 'competent authority', the role they will provide, and greater detail relating to the relevant stakeholders and public bodies that will be involved in the preparation of DMAPs so as to achieve the vision and renewable energy targets set at national level over the period of this Framework. The EMRA note that the provision of such detail may require coordination with the Department of Environment, Climate and Communications. Furthermore, the Planning and Development Bill 2023 requires that a regional spatial and economic strategy shall make provision for a "*strategy relating to marine and coastal matters that facilitates the coordination of land-sea interactions for coastal planning authorities within*

the region". The Assembly considers that Table 7.2 in the Draft First Revision should be updated to state this requirement under 'Regional – Regional Spatial and Economic Strategies'.

The 2018 NPF text has been updated to note that continued successful implementation will require administrations, such as the United Kingdom and our EU partners, regarding transboundary and shared sea basin issues, with particular reference to developing our inherent potential for offshore renewable development in an integrated and sustainable manner.

The Draft First Revision notes that the planning system plays an important role in permitting the infrastructure necessary to capture, store and transmit such energy to consumers, and in doing so, enable Ireland to utilise its vast and sustainable offshore wind and other energy resources. It further notes that offshore renewable energy production can also offer the potential to attract new green industries with high-energy needs to those locations. The establishment and function of the Maritime Area Regulatory Authority (MARA) is now also referenced in the text.

Maritime Economy

The text of Section 7.2 of the 2018 NPF relating to the maritime economy has been substantially updated in the Draft First Revision. It notes that as an island nation, the maritime sector performs a critically important function within the economy by facilitating the movement of people and goods between Ireland and its trading partners. It further notes that there are considerable opportunities for the future growth in sustainable jobs and inward investment to our regions and coastal communities in the offshore renewable energy sector and supply chain activities. The value of the seafood sector and fisheries sector is also highlighted, with the text now recognising that the planning system has an important role in ensuring that development in this sector occurs in a sustainable manner cognisant of the need to achieve an equitable balance that also meets the needs of other stakeholders in the maritime area. The Assembly welcomes these additions and amendments.

Ports

The Eastern and Midland Region is home to the largest sea port in the country, Dublin Port, and also contains a number of regional ports of significance and smaller harbours. Dublin Port is recognised in the RSES as a critical national facility, a key economic driver for the Region and the nation.

The text of Section 7.3 of the 2018 NPF relating to ports and their strategic importance has been substantially updated in the Draft First Revision. It notes that in recent years, significant investment has been made to position Ireland's ports for future growth and this has resulted in significant improvements both in terms of capacity and capability. Of particular note are the updates in relation to offshore renewable energy which is referenced in the text as a key element of the approach to reducing carbon emissions across a number of sectors, including transport and electricity generation. In this regard, regional ports are identified as having a natural advantage with proximity to potential offshore renewable energy locations and will play a critical role in facilitating the development, maintenance and operation of the sector through the accommodation of supporting infrastructure. Notwithstanding, the revised NPF should name the ports of regional significance, as well as naming equivalent ports in Northern Ireland to provide a more comprehensive all-island focus.

Coastal Environment and Planning for Climate Change

The text of the 2018 NPF relating to coastal environment and planning for climate change, Section 7.4, has been substantially updated in the Draft First Revision. It notes that coastal locations provide opportunities for recreation, and interaction with the natural environment, which are important for wellbeing and quality of life. The Government's Climate Action Plans 2021-2023 are cross referenced within the text which states that these plans identify that increases in sea levels and storm surge will

result in increased frequency of coastal flooding and erosion, with potential for significant impacts for coastal and heritage sites situated in proximity to the coast and on estuaries. The Assembly notes that the current Climate Action Plan (CAP) is for 2024, with drafting of CAP 2025 at an advanced stage. The text of the First Revision should therefore be updated to reflect this.

The Draft First Revision outlines the potential adverse effects of sea level rise and the need for a dual approach of both mitigation (tackling the cause) and adaptation measures (reduce the impacts and increase adaptive capacity and resilience). The text notes that given the nature of the risks arising, the broad range of stakeholders with responsibilities to manage these risks, and the complex legal and regulatory framework within which this must be achieved, there is a requirement for an integrated and co-ordinated response which includes spatial planning. Furthermore, the text is updated to note the need to carefully manage the ongoing development of urban areas and with respect to infrastructure located along our coastline, with the need for plan-led interventions. The Assembly welcomes these amendments. Climate change mitigation is inherent in our work on balanced regional development, just transition, the circular economy, and the transition to a renewables-based energy system. Notwithstanding, the Assembly notes that the Planning and Development Bill 2023 requires that a regional spatial and economic strategy shall make provision for a 'strategy relating to coastal zone management as a consequence of sea level change, including the identification of strategic infrastructure', as well as 'a flooding and flood management plan for the region' and suggests that the revised NPF should refer to same in reference to plan-led interventions.

Offshore Renewable Energy

Section 7.5, offshore renewable energy, of the 2018 NPF has been substantially updated in the Draft First Revision, including a case study of the South Coast DMAP for Offshore Renewable Energy (ORE). The Climate Action Plan (CAP) 2023 target of 80% of energy demand to be met from renewable sources by 2030 is set out, with offshore renewable energy identified as an emerging sectoral opportunity for coastal regions with the potential to support the delivery of Ireland's offshore wind ambitions being a particular economic development opportunity. The Draft Revision notes that enabling infrastructure will be required to ensure that coastal regions are positioned to harness this growth potential. It further notes that offshore renewable energy developments typically have long lead-in times of several years from design to commissioning stages and cross-references the NMPF and the Maritime Area Planning Act 2021 in this regard. The Assembly notes again that the most up-to-date iteration of the national CAP (and associated targets) should be referenced in the revised NPF. Furthermore, the Assembly notes that the Planning and Development Bill 2023 requires that a regional spatial and economic strategy shall make provision for a 'strategy relating to renewable energy to (i) meet national targets, (ii) identify and facilitate electricity grid infrastructure, including upgrade projects and support infrastructure, (iii) make provision for energy security, and (iv) promote steps for coordination and cooperation between public bodies, and suggests that the revised NPF should refer to same in reference to the provision of enabling infrastructure.

2.8 Working with Our Neighbours

Chapter 8.0 of the NPF 2018 has been updated to take account of changes which have taken place since 2018 including ongoing support of North-South cooperation and the all-island economy, as well as maintenance of an effective trading and cooperation relationship with the United Kingdom in managing the implications of Brexit. The updated text also notes the increasing importance of Ireland's direct links with other EU Member States by both air and sea and subsea energy connections and the need to be effectively connected into our land-based transport systems.

Ireland and Northern Ireland

Section 8.2 of the Draft First Revision updates NPF 2018 to take account of the revised National Development Plan (2021) and to reference all-island partnerships to co-design, co-fund and co-deliver investments to enhance the shared island and address common strategic concerns including through the Shared Island Fund, including the Project Ireland 2040 funds, the Government's annual funding for North/South cooperation and the PEACEPLUS programme, delivered with the European Union, UK Government and Northern Ireland Executive. Climate action and biodiversity are now referenced as areas of mutual advantage in ensuring good outcomes in terms of physical and community development and environmental quality. The Assembly welcomes these updates and amendments.

Working Together for Economic Advantage

The text of Section 8.3 of the 2018 NPF has been substantially updated in the Draft First Revision, noting the strong economic relationships and opportunities between Ireland and the United Kingdom are significantly supported and developed through planning, investment and policy cooperation across a range of areas, both North/South and East/West. The Assembly welcomes the updates to this section and welcomes the commitment in the NPF that this will remain a strong focus for the Government.

The Dublin-Belfast Corridor section of Section 8.3 of the Draft First Revision updates the 2018 NPF to directly reference the East Border Region (EBR); to take account of the launch of the Dublin-Belfast Economic Corridor Initiative in March 2021, and; to update the text in relation to developing the corridor as a distinct spatial area with international visibility with a strong emphasis on connectivity. The Assembly welcomes these additions, which are supportive of the Assembly's ongoing work in this area. With co-ordinating responsibility for the geographic area of the Dublin-Belfast Economic Corridor in the Republic of Ireland, the Assembly has a particular interest in facilitating the development of the Dublin-Belfast Economic Corridor. In this regard, the Assembly would welcome consideration of the role of the Regional Assemblies in shaping cross-border interactions within the NPF. The Assembly is currently exploring opportunities to engage with partners and stakeholders, North and South, to identify key obstacles and untapped potential for sustainable economic development, to support the Dublin-Belfast Economic Corridor in becoming a leading economic corridor in Europe which is future-fit and sustainable. As such, the Assembly would welcome a direct reference to local authorities, Regional Assemblies and Government Departments in the Republic of Ireland in NPO 58, which currently only references co-operation with relevant departments and local authorities in Northern Ireland.

Co-ordination of Investment

Both the National Planning Framework and the Regional Development Strategy for Northern Ireland provide a basis for long-term co-ordination on infrastructure development, including healthcare and education, transport, energy and communications, tourism, and social and community infrastructure. Section 8.4 of the Draft First Revision updates the text of the 2018 NPF in relation to these areas. The Assembly welcomes these additions and amendments, in particular NPOs 60, 61, 62 and 63 which seek to strengthen collaboration and cross-border cooperation across these themes. In line with Figure 8.2, the Assembly has engaged with local authorities, North and South, in relation to regional co-operation, exploring joint initiatives and co-ordinated spatial planning. In relation to transport, the Assembly notes that the All-Island Strategic Rail Review report has been finalised, meaning it does not need to be referred to as 'draft' in the revised NPF.

Managing our Shared Environment Responsibly

The text of Section 8.5 of the 2018 NPF on managing our shared environment responsibly has been substantially updated in the Draft First Revision, noting that well-coordinated cross-border approaches are essential for effective planning and investment actions, in addressing the generational challenges of climate breakdown and the biodiversity crisis, and protecting the common environmental resources of the island. It further notes that Ireland has a longstanding transboundary environmental impact assessment (EIA) relationship with the UK. The additional text details the importance of coordinated planning and cooperation on delivery of sustainable transport networks and renewable energy infrastructure, as well as emphasising the island-wide context for climate action, the need for co-ordinated approaches to the circular economy, air and water quality, biodiversity conservation and the protection of our shared heritage assets, all of which need to be supported for the necessary whole of society action on tackling climate change and environmental conservation. Co-ordinated investment to conserve cross-border region peatlands to support biodiversity, provide valuable ecosystem services and act as carbon sinks has also been added as a shared action. The Assembly welcomes these amendments which are supportive of the Assembly's approach to transboundary collaboration and consultation in relation to environmental assessment relevant to the RSES and the EU Just Transition Fund programme for Ireland.

2.9 Climate Transition and Our Environment

Chapter 9 of the 2018 NPF has been renamed 'Climate Transition and Our Environment' (formerly 'Realising Our Sustainable Future') in the Draft First Revision, and the text has been substantially updated taking account of particular changes which have taken place since 2018.

Resource Efficiency and Transition to a Zero Carbon Economy

Section 9.2 of the 2018 NPF has been updated in the Draft First Revision to include references to the adoption of: carbon budgets; national Climate Action Plans; the National Development Plan; the National Adaptation Framework, and; Sectoral Adaptation Plans. The Chapter also includes an updated list of EU Directives, national legislation and policy approaches which have been adopted since 2018.

The updated chapter references Ireland's Climate Change Assessment, 2023, which highlights that human activity has led to widespread and rapid changes in all components of the global climate system with recent extreme events in Ireland highlighting the vulnerability of individuals, communities, sectors and ecosystems to climate change and that indicate an adaptation deficit. It notes that solutions need to be implemented across all sectors and society and that Ireland's environmental challenges cut across different environmental topics, such as climate, air, soil, water, biodiversity and waste, and across organisations and sectors, business and all levels of society. The text of the Draft First Revision further states that environmental and source capacity needs to be a key consideration when identifying growth areas and that the capacity of the environment and the natural resource is critical to achieving sustainable development.

The Draft First Revision has been updated to include a variety of measures to encourage the reduction of greenhouse gas (GHG) emissions including:

- the achievement of compact growth objectives and the consequential reduction of overall land take;
- the interaction between land use planning and transport infrastructure, associated potential for carbon emissions reductions resulting from reduced commuting patterns associated with future growth;
- promoting re-use of existing buildings to reduce emissions associated with new construction;

- the continued reduction in dependency on imported fossil fuels and decarbonisation of the energy system as a whole and in particular the electricity sector through the identification of targets for renewable electricity and the accelerated roll out of on-shore wind energy and solar development;
- encouraging climate resilient planning policies;
- limiting inappropriate developments in areas where climate impacts are likely to be most severe;
- providing guidance to local authorities on climate resilient planning practises including nature-based solutions.

The Assembly welcomes these additions, in particular specific reference within the Draft First Revision that consideration of the capacity of the environment and the natural resource is critical to achieving sustainable development. Regarding the reduction of GHG emissions, the measures are supportive of RSES implementation to date, and the Assembly notes the role of the Regional Assemblies in the identification of targets for renewable electricity. Also supportive of this is the Assembly's participation as lead stakeholder on the ESPON QGasSP Targeted Analysis Project which focused on the development and delivery of a robust, simple and proportionate method for quantifying and forecasting the relative GHG impacts of alternative spatial planning policies, with pan-European applicability. EMRA led stakeholder input on methodology development and multiple iterations of the various project deliverables. The final main report and the first five annexes to the Greenhouse Gas Impact Assessment Tool are available on the [ESPON QGasSP webpage](#). These include the methodology document and case study pilots, including the Ireland case study pilot which focused on Co. Meath. The final version of the [Greenhouse Gas Impact Assessment Tool](#) was launched in March 2023. The Assembly supports the development of a user-friendly tool for quantifying and forecasting the relative GHG impacts of alternative spatial planning policies in Ireland and would welcome support for same in the revised NPF.

Section 9.2 of the 2018 NPF has also been updated in relation to sustainable land management and resource efficiency with an increased emphasis on renewable energy, urban consolidation and conservation of cultural and natural heritage. The Assembly welcomes these amendments and the statement in the Draft First Revision that it is important that synergies between utilities and infrastructure delivery partners are explored and that the environmental capacity of the receiving environment is considered in an integrated manner in policy and plan-making. The text is further updated to reference the ongoing Land Use Review.

The text in Section 9.2 in relation to 'Circular Economy' has been updated with 'buildings' now included in the definition and the promotion of the sustainable re-use of existing buildings and structures now central to NPO 68. The text notes the adoption of the Circular Economy Action Plan (CEAP) in March 2020, and the Circular Economy and Miscellaneous Provisions Act 2022 which provides a statutory framework for moving from a focus on managing waste, to a much greater focus on adapting patterns of production and consumption; preventing waste generation; and extending the productive life of all goods and products. It also notes the publication of the Circular Economy Strategy published in 2022 which sets a course for Ireland to transition across all sectors toward circularity. Two illustrative case studies are also now included in relation to the bioeconomy.

The Assembly welcomes these additions which is supportive of the Assembly's ongoing engagement with key local, regional, national and European stakeholders to strive to understand and explore the complexities of changes involved in decarbonisation and the transition to a sustainable economy. This includes rethinking sustainable economic models of sufficiency and supporting a regenerative

economy by facilitating the economic circularity of materials and energy and sustainable job creation. The Assembly's engagement as a member of the [Environmental Conference of the Regions of Europe \(ENCORE\)](#) has a key focus on integrating a circular society to create a just transition. In relation to the circular bioeconomy, the Assembly, as partner on the [Interreg Europe ORIGINN](#) project, has engaged with [EIT Climate-KIC](#) in relation to agri-food in Ireland. Furthermore, as managing authority for the EU Just Transition Fund in Ireland, the Assembly is supporting research, development and innovation in the bioeconomy sector in cooperation with the Department of Agriculture, Food and the Marine, as well as research, knowledge transfer and monitoring activities on rewetting measures for farmed peat soils.

In relation to the 'circular bioeconomy' section of Section 9.2 of the Draft First Revision, no substantive amendments have been made. The Assembly considers that the subsection on the circular bioeconomy should be updated to reference the publication of the Bioeconomy Action Plan 2023-2025, the purpose of which is to further develop Ireland's bioeconomy in delivering the vision of the 2018 National Policy Statement on the Bioeconomy. This includes actions for communities, regions and communities aligned with NPF objectives

Section 9.2 of the Draft First Revision updates the text in the 2018 NPF in relation to aggregates and minerals to highlight opportunities that may be provided for enhancement or restoration of nature in line with EU policies, such as the EU Green Deal and EU Biodiversity Strategy 2020, and legislative instruments. The updated text notes that critical raw materials are confronted with a growing global demand, driven by the decarbonisation of economies. It references the proposed EU Commission Critical Raw Materials Act, one of the three key legislative initiatives of the Green Deal Industrial Plan, to enhance the competitiveness of Europe's net-zero industry and support a rapid transition to climate neutrality. Proposed in March 2023, the Act provides for a set of actions to ensure the EU's access to a secure, diversified, affordable and sustainable supply of critical raw materials. The Assembly welcomes this addition, which is supportive of the Assembly's work in supporting the transition to a sustainable economy which meets people's needs while staying within ecological limits.

A new subsection has been added to Section 9.2 of the Draft First Revision in relation to biomethane. Biomethane is a carbon-neutral renewable gas made from farm and food waste through a process known as anaerobic digestion. A National Biomethane Strategy has been published which requires the development of policies with the primary objective of delivering the ambitious target of producing 5.7 TWh of indigenous biomethane by 2030. It is estimated that over 80% of biomethane will be produced from grass silage and cattle slurry. This will require grass from 120,000ha (3% of total agricultural area) to produce the required feedstock. To meet Ireland's target of 5.7 TWh of biomethane by 2030, a large number of anaerobic digestion facilities will need to be developed, alongside the related infrastructure necessary to support these facilities.

Another new subsection has been included under Section 9.2 of the Draft First Revision titled 'built environment'. This section notes the significant strengthening of the Building Regulations from 2006 onwards, improved efficiency through retrofit, the adoption of new low carbon technologies and fuel switching, with statistics provided for same. It also includes a graph (Figure 9.1) showing the number of retrofit property upgrades 2017-2023 (SEAI retrofitting programme) broken down by Regional Assembly area and according to the Strategic Planning Areas (SPAs) of the Regional Assemblies, which is welcomed by the Assembly. Notwithstanding, the source for this graph is attributed to the All-Island Research Observatory (AIRO) at Maynooth University who compiled the data. It is noted that the source of the data is: <https://www.seai.ie/grants/home-energy-grants/home-upgrades/>. Furthermore, since this data is released quarterly, the Assembly recommends that this graph is updated to include available 2024 data.

Section 9.2 of the Draft First Revision has included a subsection on ‘heating’ which notes that the National Heat Study Report 2022 identified that a combination of district heating, biomethane and heat pumps in homes, businesses and industry will play a vital role in fast decarbonisation. The Draft First Revision identifies that through new building regulations, 90% of new build homes are now using renewable heat. Furthermore, the national retrofit programme will play a significant role in making older dwellings more energy efficient and support the deployment of heat pumps in older dwellings.

The additional text further notes that district heating can also play a key role in improving energy efficiency and reducing emissions in Ireland particularly in tandem with the delivery of largescale development and higher densities. It can offer flexibility in fuel choice and could therefore be suited to wide scale decarbonisation of heating systems, and in buildings that are difficult to retrofit. CAP23 has identified a target of up to 0.8 TWh of district heating installed capacity across both the residential and commercial building stock by 2025, and up to 2.7 TWh by 2030. The Assembly welcomes this additional text and will strive to support the growth and development of efficient district heating, electrification of heating, and utilisation of geothermal energy across our Region, in line with NPO 69.

A new subsection has also been included in Section 9.2 of the Draft First Revision for ‘net zero industry and technology’. This notes that a proposal for the Net Zero Industry Act (NZIA) was published by the European Commission in March 2023, and is a key element of Pillar 1 of the Green Deal Industrial Plan. The aim of NZIA is to scale up net-zero technology manufacturing in the EU to provide at least 40% of the EU’s annual deployment needs for strategic net-zero technologies by 2030. This is welcomed by the Assembly.

A new subsection has been added to Section 9.2 of the Draft First Revision titled ‘renewable electricity’. This notes that government has set ambitious targets to achieve 9 GW of onshore wind, 5 GW of offshore wind and 8 GW of solar by 2030, as well as supporting at least 500 MW of local community-based renewable energy projects and increased levels of new micro-generation and small-scale generation. The section sets out the need: for accelerated delivery of additional renewable electricity generation; for a diversified energy portfolio from multiple sources; to develop and upgrade the national grid, and; to adhere to national targets for the electricity sector and regulatory and policy developments at an EU level. The Assembly welcomes this additional text and will strive to support the ongoing rollout of renewable energy in line with NPOs 71, 72, 73 and 74.

Section 9.2 of the 2018 NPF has been updated in the Draft First Revision to note that renewable energy is being championed as a significant new source of jobs and rural growth in OECD countries. It further notes that development of renewable energy generation can include co-location with agricultural activities that supports both a reduction in carbon emissions and land-use diversification options for farmers in line with the carbon budget programme and the Climate Action Plan. It further notes that opportunities also exist for colocation of renewable technology in areas, alongside transport infrastructure corridors, within forestry lands, and on industrial and post-industrial peatlands. In addition, the co-location of future offshore renewable energy generation and green industrial demand is signalled as a significant economic development opportunity for rural and coastal communities in the Department of Enterprise, Trade and Employment’s ‘Powering Prosperity – Ireland’s Offshore Wind Industrial Strategy’. Opportunities are also identified in relation to the Community Benefit Funds. The Assembly welcomes these additions.

New text is added to Section 9.2 the 2018 NPF noting that the Draft First Revision supports the Just Transition, meaning that local communities and citizens in particular in the Midlands region can participate in the transformations underway across society, including in the energy sector. The Assembly welcomes this specific reference to Just Transition in the Midlands which complements our

work as managing authority for the EU Just Transition Fund, the single specific objective of which, as set out in Regulation (EU) (2021/1056), is to mitigate the adverse effects of climate transition by supporting the most affected territories and workers concerned and to promote a balanced socio-economic transition.

An entirely new subsection has been added to Section 9.2 of the Draft First Revision titled ‘Regional Renewable Electricity Capacity Allocations,’ which is of particular relevance to the Regional Assemblies. This subsection indicates a range of regional renewable electricity capacity allocations which are to be integrated into the Regional Spatial and Economic Strategies and the associated Regional Renewable Energy Strategies¹ (RRESs), and, in addition, are to be translated to county-level targets that will inform city and county development plans.

Each Regional Assembly, having regard to this evaluation, must plan for sufficient wind and solar energy development in order to achieve the regional renewable electricity capacity allocations outlined in Table 9.1, (and in addition to current installed energised capacity), in order to facilitate the 2030 national renewable electricity generation targets. The RRES roadmap will provide further guidance in this regard. Specifically, NPO 75 states that:

- Each Regional Assembly must plan, through their Regional Spatial and Economic Strategy, for the delivery of the regional renewable electricity capacity allocations indicated for onshore wind and solar reflected in Table 9.1 below, and identify allocations for each of the local authorities, based on the best available scientific evidence and in accordance with legislative requirements, in order to meet the overall national target.

Table 9.1 | Regional Renewable Electricity Capacity Allocations

Region	Energised capacity 2023 (MW)	Additional Renewable Power Capacity Allocations (MW)	Total % of National Share in 2030	Energised Capacity 2023 (MW)	Additional Renewable Power Capacity Allocations (MW)	Total % of National Share in 2030
	Onshore Wind			Solar PV		
Eastern and Midlands	284	1,966	25%	306	3,294	45%
Northern and Western	1,761	1,389	35%	0.3	959	12%
Southern	2,622	978	40%	138	3,302	43%
Total	4,667	4,333		445	7,555	

Further to our ongoing engagement on the Spatial Planning Steering and Workshop Groups for the RRESs, the Assembly welcomes the inclusion of the capacity allocations. The Planning and Development Bill 2023 requires that a regional spatial and economic strategy shall make provision for a strategy relating to renewable energy to (i) meet national targets, (ii) identify and facilitate electricity

¹ The Draft First Revision notes that each Regional Assembly will prepare a Regional Renewable Electricity Strategy (RRES), whereby additional detail will be outlined on how the regional renewable electricity capacity allocations for the Region can be best achieved in a consistent and sustainable manner, including the identification of specific targets for each of the constituent local authorities.

grid infrastructure, including upgrade projects and support infrastructure, (iii) make provision for energy security, and (iv) promote steps for coordination and cooperation between public bodies. Notwithstanding, the Assembly recommends that appropriate methodological guidance for capacity allocations is provided to the Regional Assemblies by the Department, in addition to appropriate expertise and resourcing (human and financial) to support achievement of the targets based on the best available scientific evidence and in accordance with legislative requirements.

Finally, Section 9.2 of the Draft First Revision updates the text of the 2018 NPF in relation to ‘managing waste’ to note that soil contamination and degradation and water pollution can occur as a result of unauthorised waste related activities, historical activities, leakages and accidental spillages of chemicals. Proposals to develop areas with potential or known histories of unauthorised waste related activities should include measures for remediation of these lands, and addressing these issues can be a lengthy and costly process. NPO 77 now also makes direct reference to construction and demolition waste. The Assembly welcomes these additions.

Protecting Conserving and Enhancing our Natural Capital

Section 9.3 of the Draft First Revision includes updates and additions in relation to climate adaptation; water resource management and flooding; nature-based solutions; green and blue infrastructure; green belts and green and blue spaces; strategic planning for biodiversity; nature restoration; natural and cultural heritage, and landscape, each of which are now considered in turn. The Assembly notes that no definition of ‘natural capital’ is provided within the Draft First Revision and that the inclusion of same would be beneficial.

A new subsection on ‘climate adaptation’ under Section 9.3 of the Draft First Revision has been included which notes the adoption of the National Adaptation Framework (NAF) in June 2024. The NAF and existing climate legislation sets out a requirement for sectoral adaptation plans covering priority national level sectors. The Environmental Protection Agency has commenced work on a National Climate Change Risk Assessment. The text notes that the planning process provides an established means through which to implement and integrate climate change objectives, including adaptation, at local level, in particular the identification through the zoning of land for appropriate land uses having regard to the risks associated with climate change and through integrating climate resilient practices into development at regional and local level. The Assembly welcomes these developments and in particular the recognised importance of regional level planning. As a clear demonstration of the Assembly’s engagement in the area, the Assembly is represented on the National Adaptation Steering Committee, the principal coordinating body for adaptation policy across the Irish Government.

The 2018 NPF text has been updated under Section 9.3 of the Draft First Revision to note that regional spatial and economic strategies must ensure the integration of sustainable water management considerations, as stated in the Planning and Development Bill 2023. Furthermore, the requirements of the EU Water Framework Directive (2000/60/EC) (WFD) are outlined, and it is noted that the third cycle River Basin Management Plan (RBMP) is currently under development. The core objectives have been updated to include the prioritisation of nature-based solutions to manage water in terms of both quantity and quality and promote climate change mitigation strategies, and the need for integrated planning responses. The Assembly welcomes these additions and amendments, including the updated text in NPO 78 which includes taking account of the potential impacts of climate change on flooding and flood risk and consideration of the Flood Risk Management Climate Change Sectoral Adaptation Plan.

The Draft First Revision includes a new subsection under Section 9.3 titled ‘nature-based solutions’. This concept was not referenced in the 2018 NPF. The updated text includes two definitions of nature-based solutions. First, the definition of the International Union for Conservation of Nature which states *“actions to protect, sustainably manage, and restore natural and modified ecosystems that address societal challenges effectively and adaptively, simultaneously benefiting people and nature”*. Second, the European Commission definition which states *“solutions that are inspired and supported by nature, which are cost-effective, simultaneously provide environmental, social and economic benefits and help build resilience. Such solutions bring more, and more diverse, nature and natural features and processes into cities, landscapes and seascapes, through locally adapted, resource-efficient and systemic interventions.”*

The text notes that nature-based solutions must benefit biodiversity and support the delivery of a range of ecosystem services. It is further noted that sustainable urban development solutions, such as water sensitive urban design, can help to mitigate the potential for environmental degradation in the form of biodiversity loss, pollution of water bodies, and increased flood risk as the demand for urban development to accommodate a growing population continues to increase. Further to this, an illustrative example of the Wexford Retention Pond is included as a case study and NPOs 79 and 80 refer to nature-based solutions in relation to the management of stormwater, rainwater and surface water flood risk and supporting the retrofitting of existing environments to cater for surface water run-off.

The Assembly strongly welcomes the inclusion of nature-based solutions as a concept in the Draft First Revision since nature-based solutions are central to meeting our challenges, particularly those related to climate change adaptation. The Assembly also welcomes the reference to ecosystem services within this new subsection. Notwithstanding, the Assembly notes that the term ‘ecosystem services’ is not defined in the Draft First Revision and recommends the inclusion of the [EU definition](#) as follows:

“Ecosystem services are the services that an ecosystem supplies and on which humans depend. Ecosystem services from which humans benefit are often categorised as follows:

- *provisioning services such as food, water, wood, fibre and genetic resources;*
- *regulating services such as climate regulation, floods, disease and water quality;*
- *cultural services such as recreation and ecotourism;*
- *supporting services such as soil formation, pollination and nutrient cycling.”*

The ‘Green Infrastructure’ subsection in the 2018 NPF has been updated to ‘Green and Blue Infrastructure’ under Section 9.3 in the Draft First Revision. The Assembly welcomes the addition of a definition for green infrastructure, as well as the recognition within the text of the value of connectivity and the cultural heritage of green infrastructure for population health and wellbeing. The text of NPO 81 is updated to emphasise the importance of maintaining ecosystem services and ecosystem functions and conserving and/or restoring biodiversity when planning for green and blue infrastructure which is strongly welcomed by the Assembly.

Through participation on the [Interreg Europe PROGRESS project](#), the Assembly has developed [a range of resources](#) to support the implementation of objectives for ecosystem services and green infrastructure. These include a green infrastructure and ecosystem services mapping methodology, policy briefs which include ‘how to’ recommendations, good practice handbooks, and infographics.

In cooperation with Dún Laoghaire-Rathdown County Council and the Ecological Research and Forestry Applications Centre, Barcelona, Spain, the Assembly secured Interreg Europe funding to test a Green Infrastructure Decision Support Mapping Approach for Ecosystem Services. This involved

developing and testing a mapping methodology to contribute to enhanced decision-making for Green Infrastructure by scoring and mapping ecosystem services for the Dún Laoghaire-Rathdown County Council administrative area. A methodology was developed and criteria were established to transfer the [SITxell](#) conceptual model and methodology. A range of ecosystem services were mapped based on three contrasting perspectives: 1) Intrinsic value, 2) Functional value, and 3) Leisure/Cultural value. The Pilot Action also tested whether these three dimensions might be combined in order to identify the areas maximising the sum and the diversity of values.

The Mapping Approach was evaluated by target users at dedicated workshops in January 2022 and it was determined that the methodology and mapping approach was both effective and appropriate to contribute to the development of a coordinated approach for Green Infrastructure and Ecosystem Services Mapping in the Dublin Metropolitan Area. The [technical report](#) outlining the methodology of the mapping approach was published in June 2022. The successful completion of this Pilot Action has advanced MASP objectives for strategic green infrastructure.

Notwithstanding, issues of financial and human resourcing for the development of a standardised mapping approach and the need for enhanced Green Infrastructure mapping at national, regional and local levels emerged as key challenges. Furthermore, stakeholder engagement revealed that different methodologies for green infrastructure and ecosystem services scoring and mapping are being developed and used by local authorities and public bodies, resulting in a lack of consistency and comparability. As such, the Assembly recommends that the revised NPF includes an objective to support the development of a standardised green infrastructure and ecosystem services scoring and mapping approach, driven from the national level, down to the regional and the local.

The Draft First Revision retains a separate subsection under Section 9.3 on Green Belts and Green and Blue Spaces, including a standalone NPO (NPO 82), which is updated to note the importance of well-protected 'green' and 'blue spaces' as a key part of urban landscapes that are needed for healthy communities and also offer the potential for climate adaptation co-benefits. While the Assembly welcomes this added emphasis, we consider that green belts and green and blue spaces form part of the green and blue infrastructure network and should not be considered separately. The Assembly therefore recommends that, with the added benefit of a definition of ecosystem services, which include cultural services, these two sections should be amalgamated under the heading of 'Green and Blue Infrastructure'.

The text of the 2018 NPF has been substantially updated under Section 9.3 of the Draft First Revision to recognise the extent of the biodiversity crisis and the need for immediate action to avoid irreversible losses. Key UN publications are now referenced, along with Ireland's 4th National Biodiversity Action Plan 2023-2030, the Wildlife (Amendment) Act 2023 and resulting National Biodiversity Action Plans. The updated text now also recognises the interconnection of climate and biodiversity from an all-Island perspective and notes that by the end of 2026, all local authorities are to have a Biodiversity Action Plan in place, in line with the National Biodiversity Action Plan. The Assembly welcomes these updates which are supportive of the work of the Assembly and recognises the role of healthy ecosystems in enhancing climate resilience and accelerating a transition to a low carbon economy.

'Nature Restoration' is a new subsection under Section 9.3 of the Draft First Revision which notes that the EU Nature Restoration Law seeks to restore at least 20% of the EU's land and sea areas by 2030 and all ecosystems by 2050. In addition to further detail in relation to the EU Nature Restoration Law, the new text includes the target of the 4th National Biodiversity Action Plan (NBAP) to publish a National Restoration Plan by 2026, which is to set out the procedures for designation of nature

restoration areas and corresponding policies. Further to this, three new NPOs are included in relation to this (NPOs 83, 84 and 85) and this is welcomed by the Assembly. The Assembly considers that the national plans being developed for Nature Restoration, with their emphasis on public lands, will complement the ongoing work of the Assembly, both in relation to our RSES and as managing authority for the EU Just Transition Fund in Ireland.

The 2018 NPF 'Natural Heritage' subsection has been updated to 'Natural and Cultural Heritage' under Section 9.3 of the Draft First Revision. The text has been updated to note that Ireland's archaeological heritage is a major cultural and scientific resource, enabling us to understand our history in all its aspects and how the peoples of Ireland have lived in, and interacted with, the environment. It further recognises the vulnerability of archaeological heritage, and that the protection of archaeological heritage is recognised as a core component to achieving sustainable development. The Brú Na Bóinne National Park, located in the Eastern and Midland region, is included as an illustrative case study, which is welcomed by the Assembly.

Creating a Clean Environment for a Healthy Society

Section 9.4 of the Draft First Revision includes updates to the text of the 2018 NPF relating to water quality, air quality and noise quality.

Regarding water quality, the text is updated to note that in plan-making and decision-making within the planning system, decision makers should consider both the capacity of the receiving environment to accommodate the development of water and wastewater infrastructure in line with statutory environmental legislation, and the potential to align planned growth with existing water and wastewater infrastructural capacity, to the extent feasible. It further notes that Uisce Éireann publishes annual water supply and wastewater treatment capacity registers, which can assist with this process. The Assembly welcomes these updates which emphasise the need to consider both environmental and infrastructural capacity.

The text of the 2018 NPF is also updated under Section 9.4 of the Draft First Revision to reference the publication of the Clean Air Strategy for Ireland (2023) which provides the high-level strategic policy framework necessary to identify and promote the integrated measures across government policy that are required to reduce air pollution and promote cleaner ambient air, while delivering on wider national objectives.

The updated text of the subsection relating to noise quality under Section 9.4 of the Draft First Revision now includes a definition of environmental noise as *"unwanted or harmful outdoor sound created by human activity, such as noise emitted by means of transport, road traffic, rail traffic, air traffic, and industrial activity"*, as well as updates to text on 'Noise Management and Action Planning', 'Noise, Amenity and Privacy', 'Quiet Areas', as well as referencing the requirement of strategic noise maps in NPO 91. While these updates are welcome, the Assembly considers that the title of this subsection should be amended to 'Environmental Noise', which is one of the focuses of the NPF.

2.10 Implementing the National Planning Framework

Chapter 10 of the Draft First Revision includes updates to the 2018 Draft First Revision in relation to Governance and Oversight; The Planning System; Public Capital Investment – The National Development Plan and National Strategic Outcomes.

Governance and Oversight

The introductory text of Section 10.1 of the Draft First Revision has been expanded upon, and there is now explicit recognition that key investments needed to sustain projected population growth and

attractiveness to 2040, in areas such as housing, energy, climate, transport, healthcare and education, will give rise to coordination and capacity challenges. It notes that the Government is advancing a range of reforms and actions aimed at enhancing capacity and addressing constraints to National Development Plan (NDP) delivery, and references are made to a 2024 ESRI report that makes suggestions on how the timing and sequencing of NDP projects might be designed so that maximum benefits are derived. While this recognition is welcomed by the Assembly, it is considered that this section could be strengthened by providing more detail on these reforms and actions and how they are improving implementation in an applied sense.

The section proceeds to reference the 2023 OECD report on enhancing the delivery of the NPF and outlines some of its key recommendations, including the need for new governance arrangements at regional level to improve coordination between national, regional and local authorities, infrastructure providers and other stakeholders in order to secure the delivery of Regional Spatial and Economic Strategies and Metropolitan Area Strategic Plans. The Assembly welcomes this reference to the OECD report and recognition within the text that these recommendations are relevant to the overall achievement of the NPF, however, the Assembly disagrees with the assertion within the text that 'these recommendations go beyond the scope of the NPF as a spatial planning strategy'. The Assembly considers that support of these recommendations throughout the Draft First Revision, as highlighted at Chapter 10 and Chapter 3, and that they, and the recommendations of the Expert Group for the First Revision, could be further reflected in the text of the Draft First Revision. In tandem with the NPF's objective of strengthening the regions, the report and recommendations on [Monitoring of the application of the European Charter of Local Self-Government in Ireland](#) by the Congress of Local and Regional Authorities of the Council of Europe Monitoring Committee on the Honouring of Obligations and Commitments by Member States of the European Charter of Local Self-Government, should be addressed, in particular the need for electoral reform to regional assemblies so that their members are elected directly by the citizens. This would also make regional government in Ireland more similar to the regional level in other European countries.

Notwithstanding, the Assembly will continue to collaborate with the Association of Irish Regions to raise awareness about the roles of Regional Assemblies and to address the report and recommendations from the reports of the OECD, as well as the report of the Congress of Local and Regional Authorities' Monitoring Committee on the Honouring of Obligations and Commitments by Member States of the European Charter of Local Self-Government. This includes engaging with the Seanad Public Consultation Committee on their report and recommendations regarding the Future of Local Democracy and advocating for addressing the deficiencies in structural mechanisms to coordinate the delivery of regional priorities. The Assembly will also work closely with the Association of Irish Local Government to promote and advocate for the important role that local and regional government and their public representatives play in strengthening local democracy, improving public service delivery, and supporting communities.

The updated text under Section 10.1 of the Draft First Revision has regard to the legislative basis for the NPF, with reference to the forthcoming enactment of the Planning and Development Bill 2023, as well as the role and impact of the Office of the Planning Regulator since establishment. The Assembly notes these amendments and takes this opportunity to reemphasise the centrality of the Regional Spatial and Economic strategies, which include the MASPs, in the coordinated implementation of the NPF at the regional and local level.

With regard to phasing under Section 10.1 of the Draft First Revision, population targets for 2030 and 2040 are updated, with the figures for population growth in the Eastern and Midland Region updated

to 270,000 and 470,000 respectively. The Assembly considers that the text should be updated to clearly state the reference/baseline year of relevance for these growth figures.

The Planning System

Introductory text has been added to Section 10.2 of the Draft First Revision to provide an outline of the legislative basis for a plan-led system to ensure proper planning and sustainable development through a hierarchy of inter-related and complementary plans and policies including the NPF, RSEs and local plans. The Assembly welcomes this addition.

The Regional Spatial and Economic Strategies section of Section 10.2 of the Draft First Revision has been updated to include text noting that since the publication of the NPF in 2018, the three Regional Assemblies have prepared Regional Spatial and Economic Strategies. It notes that the preparation of the strategies involved the relevant local authorities, working together with stakeholders, including the Minister and Department of Housing, Local Government and Heritage and other interests, to put in place a regional co-ordination framework for statutory development plans at local authority level.

While the Assembly welcomes this update, the text as stated lacks precision. The Assembly recommends that the text is amended to state that *“Preparation of the strategies involved the Regional Assemblies, working together with relevant local authorities and stakeholders, including the Minister and Department of Housing, Local Government and Heritage and other interests, to put in place a regional co-ordination framework for statutory development plans at local authority level.”*

It is further stated that *“the RSEs in turn form the basis for local authority development plans and Local Economic and Community Plans (LECPs), to ensure their consistency with national and regional policy.”* Again, the Assembly considers that this sentence lacks precision and appropriate detail. A key weakness is that there is no description of the legislative basis or purpose of the Local Economic and Community Plans (LECPs), either at this location or elsewhere in the NPF document.

The text proceeds to reference Section 25A of the Planning and Development Act 2000, as amended, which requires each of the three Regional Assemblies to prepare a report every two years on progress on delivering the Regional Spatial and Economic Strategy (RSES), and to submit the report to the National Oversight and Audit Commission (NOAC). It further notes that the monitoring reports specifically identify the progress made in objectives of RSES by planning authorities, public bodies and their agencies and the relevant Regional Assembly.

The Assembly notes that Section 35(4) of the current version of the Planning and Development Bill 2023 (81b of 2023) states that *“[a] regional assembly shall, within 4 years of the first occasion on which a regional spatial and economic strategy is made or revised under this Chapter and every 4 years thereafter, prepare a report (in this section referred to as a “monitoring report”) monitoring progress made in implementing the regional spatial and economic strategy.”* That is, the monitoring interval is changed from two years to four years. Furthermore, reporting by local authorities is amended to a three-year cycle, while reports by others, including public bodies and their agencies, may be requested by the Regional Assembly on a three-year cycle.

Further to this, it is the view of the Assembly that regular statutory reporting and monitoring improves coordination which supports local authorities, government departments, and their agencies, to focus on consistent agreed strategic outcomes as set out in the NPF. The development of progress reports as required under sections 35(2) and 35(3) and the overall Monitoring Report as required under section 35(4), covering three-year and four-year periods respectively, is a substantial ask for local authorities and public bodies to coordinate, owing to the extended time periods of three and four years, as set out the Bill. Furthermore, the three-year and four-year reporting and monitoring

timeframes as set out in the Bill are themselves out of step and would be increasingly so over time (i.e. years 3, 6, 9 for local authorities and public bodies under S35 (2) and (3) versus years 4, 8, and 12 for the monitoring report itself (S35 (4))). The Assembly considers that incremental and coordinated monitoring at more regular intervals would prevent this.

The Assembly is of the view that the retention of a two-year coordinated monitoring timeframe (as is currently provided for under Section 25A of the Planning & Development Act 2000, as amended, and as set out in the Draft First Revision), would facilitate timely and streamlined reporting to improve coordination and more effectively deliver consistent strategic outcomes in line with the NPF.

The final sentence of this subsection in the Draft First Revision states that the Draft Planning and Development Bill 2023 includes proposed statutory provisions to further align the planning policy hierarchy of plans by increasing the strategic lifespan of County and City Development Plans to 10 years, concurrent with the RSES 12-year period of implementation. The Assembly notes that respective 10- and 12-year periods of implementation are not concurrent in nature and would be increasingly out of step over time. The Assembly recommends that this subsection is reviewed in its entirety to ensure accuracy and coordinated implementation.

The section on ‘Metropolitan Area Spatial Planning’ under Section 10.2 of the 2018 NPF has been substantially amended in the Draft First Revision, with much of the text outlining the designation and content of the MASPs now removed. Furthermore, the text reads as if the MASPs are somehow separate or additional to the Regional Spatial and Economic Strategies. As set out in Section 29(2) of the Planning and Development Bill 2023 (81b of 2023):

Where a city specified in subsection (3) is within the region to which a regional spatial and economic strategy relates, the regional spatial and economic strategy shall include an integrated land-use and transportation strategy for the metropolitan area (in this Part referred to as a “metropolitan area strategic plan”), which shall be consistent with the regional spatial and economic strategy concerned.

The Assembly therefore recommends that the second paragraph of this subsection is deleted as it implies that RSEs do not deal with city and metropolitan issues. Furthermore, the text of NPO 92 should be updated to reference the Regional Assemblies as the appropriate authorities and to remove the phrase ‘in tandem with’ which implies that the MASPs are separate to the RSEs. That is, the Assembly strongly recommends that NPO 92 should be updated to read:

“Metropolitan Area Strategic Plans for the Dublin, Cork, Limerick, Galway and Waterford Metropolitan areas and in the case of Dublin and Cork, to also address the wider city region, shall be reviewed by the Regional Assemblies as part of a review of the relevant Regional Spatial and Economic Strategy”.

The text is further updated in this subsection to state that up to 20% of the phased population growth targeted in the principal city and suburban area, could potentially be accommodated in the wider metropolitan area i.e. outside the city and suburbs or contiguous zoned area. This would be in addition to growth identified for the Metropolitan area. It is further stated that planned growth in the metropolitan area would be targeted towards the delivery of new sustainable communities at brownfield and greenfield locations along existing or planned high-capacity public transport corridors in accordance with the principles of Transport Orientated Development. While the justification of this 20% target is not made explicitly clear within the text, the amendments appear to be consistent with our priority to ensure that development is directed across the Region, consolidating existing settlements based on public transport and active travel (Transport Orientated Development) and taking account of the changes to transport demand and workplace locations resulting from changed

working patterns. Further to this the Assembly welcomes the inclusion of NPO 93 in the Draft First Revision.

The 'Integrating Spatial and Transport Planning' section under Section 10.2 of the Draft First Revision has been substantially updated to note the wide-ranging benefits of integrating transport and land-use. It notes that responsibility for the integration of land use and transportation outside of central Government, is a joint responsibility of planning authorities, the NTA and other government agencies. It further outlines the role of the NTA in preparing the Transport Strategy for the Greater Dublin Area (GDA) and the requirement for "*mutual consistency between the Transport Strategy, the Regional Spatial and Economic Strategy for the Eastern and Midlands Region and local authority development plans within the GDA.*" While the Assembly welcomes these updates, the Assembly considers that this subsection should be updated by making direct reference to the Dublin MASP as the key element of the RSES as regards consistency with the NTA Transport Strategy for the GDA. Furthermore, it is noted that the name of the Assembly is incorrectly referred to as 'Eastern Midlands Regional Assembly. The correct term is the 'Eastern and Midland Regional Assembly.' This should be rectified in the revised NPF.

This subsection has been further updated to note that the Department of Housing, Local Government and Heritage and the Department of Transport are working with the LDA, NTA, local and regional authorities and infrastructure providers to identify suitable opportunities for Transport Orientated Development (TOD) at scale in the five cities, aligned to planned investment in the public transport network. It is further noted that the two Departments are also reviewing opportunities for better integration of land use and transport in the regional centres. The Assembly considers that the Regional Assemblies should be included in this process and, in so-doing, support the coordinated implementation of NPO 95.

The section 'Better Strategic Planning for Urban Areas' under Section 10.2 of the Draft First Revision has been updated to provide detail in relation to the three new types of focused area plans which are to replace local area plans through the Planning and Development Bill 2023. In addition, the introduction of new Urban Development Zones (UDZs) is noted and NPO 96 is updated to reflect same. The Assembly welcomes these updates and considers that the overall Draft First Revision could be strengthened through similar comprehensive consideration of the impacts of the Planning and Development Bill 2023, once enacted, on wider aspects of the NPF.

The text of the 'Strengthening Local Authority Planning: Plan Making and Core Strategies' section under Section 10.2 of the Draft First Revision has been updated to note the publication of the Section 28 Ministerial Guidelines on 'Housing Supply Target Methodology for Development Planning' to support the implementation of the NPF and the three RSEs. In so-doing, NPO 71 of the 2018 NPF, which related to development plan core strategies and associated methodologies, has been deleted and is not included in the Draft First Revision. While the Assembly welcomes the publication of these guidelines, it is considered that the text of the NPF could be strengthened by setting out the key elements of these guidelines and explaining in a practical sense, how they can support the implementation of the NPF and the RSEs to ensure a coordinated and balanced approach to future population and housing requirements across urban and rural areas.

The text of the section 'Coordinating Land Use Zoning, Infrastructure and Services' is updated under Section 10.2 in the Draft First Revision to note that compact and sustainable growth that can act as a driver of urban regeneration and renewal. It further states that such an approach has the potential to revitalise traditional core areas while also ensuring that maximum benefit is derived from the very significant public investment that the State makes in services and infrastructure. It further notes that

the Residential Zoned Land Tax and the introduction of Land Value Sharing proposals will assist in incentivising the development of such zoned land in urban areas and ensuring that the necessary infrastructure is in place to facilitate development. The Assembly welcomes these amendments and notes that NPOs 97, 98 and 99 (formerly NPOs 72a, 72b and 72c) are retained exactly as they were in the 2018 NPF.

The final subsection of Section 10.2 of the 2018 NPF is in relation to ‘Prioritising Development Lands’. In this subsection, NPO 73a of the 2018 NPF, which was in relation to guidance to enable planning authorities to apply an order of priority for development of land, has been deleted from the Draft First Revision. Furthermore, NPO 102, which is *“Develop and implement new approaches to measuring and monitoring compact growth in cities and larger settlements aligned to increased digitalisation of the planning system”* is new to the Draft First Revision. The Assembly welcomes the inclusion of NPO 102. Notwithstanding, the Assembly considers that NPO 102 could be strengthened by making reference to the appropriate authority or authorities who will develop and implement the new approaches.

Public Capital Investment – The National Development Plan and National Strategic Outcomes

Much of the contextual text in the introduction to Section 10.3 has been deleted in the Draft First Revision. While in need of updating, the Assembly considers that the provision of further context in this location would be beneficial.

Section 10.3 of the Draft First Revision sets out the 10 National Strategic Outcomes (NSOs) of the NPF. The 10 NSOs have remained unchanged from the 2018 NPF, however the text and content of their descriptions has been updated to take account of changes and developments since 2018. Furthermore, the Assembly notes that the numbering designation of the NSOs (and some names) are not consistent between the infographic on page 5 of the Draft First Revision, and as listed in Chapter 10. Inconsistencies are highlighted in red in the table below.

NSOs as listed on page 5 (consistent with 2018 NPF numbering)	NSOs as detailed in Chapter 10
NSO 1 - Compact Growth	NSO 1 - Compact Growth
NSO 2 - Enhanced Regional Accessibility	NSO 2 - Enhanced Regional Accessibility
NSO 3 - Strengthened Rural Economies and Communities	NSO 3 - Strengthened Rural Economies and Communities
NSO 4 - Sustainable Mobility	NSO 4 - High-Quality International Connectivity
NSO 5 - A Strong Economy supported by Enterprise, Innovation and Skills	NSO 5 - Sustainable Mobility
NSO 6 - High-Quality International Connectivity	NSO 6 - A Strong Economy Supported by Enterprise, Innovation and Skills
NSO 7 - Enhanced Amenity and Heritage	NSO 7 - Enhanced Amenities and Heritage
NSO 8 - Transition to a Low Carbon and Climate Resilient Society	NSO 8 - Transition to a Low Carbon and Climate Resilient Society
NSO 9 – Sustainable Management of Water, Waste and other Environmental Resources	NSO 9 - Sustainable Management of Water and other Environmental Resources
NSO 10 - Access to Quality Childcare, Education and Health Services	NSO 10 - Access to Qualify Childcare, Education and Health Services

These changes are now considered for each NSO, with reference to NSO number as included in Chapter 10 of the Draft First Revision.

NSO 1 - Compact Growth

The text has been updated to note that since the publication of the NPF in 2018, there has been significant investment in urban areas aimed at supporting compact growth and progress has been made on land activation and active land management measures aimed at bringing forward brownfield and infill lands for development.

As also referred to in Section 5.3 of the Draft First Revision, substantial further detail has been provided in relation to the Urban Regeneration and Development Fund (URDF) and Rural Regeneration and Development Fund (RRDF) and their role in supporting regeneration and rejuvenation projects, with further reference to the Town and Village Renewal Scheme, which includes a Building Acquisition Measure for vacant buildings and sites, and the Town Centre First Policy 2022. As previously mentioned in Section 2.5 of this submission, the Assembly recommends that the Draft First Revision should reference the Town Centre First Heritage Revival Scheme (THRIVE) in Sections 5.3 and 5.5 of the First Draft Revision, and the Assembly also recommends that it is also relevant under this NSO.

Under 'Land Activation and Active Land Management', new text is included which sets out a number of land activation and active land management measures being advanced by the Government through legislation to ensure that the potential for urban development in the built-up area of cities and towns, with proximity to services and good quality public transport, can be accelerated. It further notes that proposals for the introduction of Urban Development Zones (UDZs) and Land Value Sharing (LVS) are being progressed. The Assembly welcomes these updates to the text of NSO 1.

NSO 2 - Enhanced Regional Accessibility

The text of NSO 2 is updated to note that the interurban rail network plays a key role in offering sustainable travel alternatives to private car travel and broadens labour catchments, benefitting the international competitiveness of our major cities. The updated text states that there is further potential, as identified within the Draft All Island Strategic Rail Review, to enhance rail links between our major cities (including an intercity spine connecting Belfast, Dublin and Cork) with increased capacity, line speed and frequency of service. The Assembly welcomes these updates. Notwithstanding, the Assembly notes that the All-Island Strategic Rail Review is now finalised and therefore does not need to be referred to as 'draft'.

The Draft First Revision states that it is also important that vehicular traffic is removed from urban areas, where possible, to enable the efficient use of the national road network, in particular for commercial traffic. It is noted that this will also increase user safety and remove traffic congestion in urban and rural centres. The Assembly welcomes this amendment and considers that it could be strengthened by referencing the draft National Transport Demand Management Strategy (as referenced in NSO 5) entitled '*Moving Together: A Strategic Approach to the Improved Efficiency of the Transport System in Ireland*' and its accompanying draft Implementation Plan entitled '*Strengthened Implementation of Demand Management across National Planning System*', both prepared by the Department of Transport. The purpose of the draft National Transport Demand Management Strategy is to manage and reduce traffic congestion, making the country's transport system more efficient for users and to alleviate the impacts of car dependency on the economy, the environment and the health of Irish society. It is therefore of key relevance in relation to enhanced regional accessibility.

Further to this, the Draft First Revision now notes that cycling will also play a role in enhancing regional connectivity, through the implementation of the National Cycle Network, published in 2024. This

network will integrate greenways, the EuroVelo network and regional and local cycling routes and will support economic growth of regional urban areas of 5,000+ population as well as priority tourist destinations.

NSO 3 - Strengthened Rural Economies and Communities

The text of NSO 3 is updated to reference the publication and implementation of the Our Rural Future; Our Living Islands; Food Vision 2030 and the establishment of the Connecting Ireland Programme. The rural development objectives remain the same as those included in the 2018 NPF.

NSO 4 - High-Quality International Connectivity

The text of NSO 4 has been substantially updated, noting that Ireland relies heavily on international connectivity to enable export-led growth, support and develop our tourism sector and also to attract high value foreign direct investment. It notes that these sectors have been the cornerstones of successive Governments' economic and trade policies, and our ports and airports have played a critical role in facilitating their development over recent decades. It is noted that Exchequer funding will be required and that capital plans of the State-owned ports and airports must align with Government policy objectives including specific relevant sectoral policies and the National Development Plan.

Regarding airports, the Draft First Revision notes the need to develop and enhance modern, technologically-advanced, cost-efficient infrastructure at our State airports to enhance safety and security, to reduce environmental impact, and to maintain and develop international connectivity. In relation to the enhancement of land-side access, BusConnects and associated road network capacity in Dublin are now referenced alongside MetroLink. The Assembly welcomes these amendments.

Regarding ports, the text is updated to emphasise the importance of ports and that in the years ahead environmental, technological, demographic, and geopolitical developments will have a significant influence on how the sector evolves. Notwithstanding, the Assembly considers that this section could be strengthened by also referencing significant ports in Northern Ireland given the renewed focus in the Draft First Revision on the all-island economy.

NSO 5 - Sustainable Mobility

The text of NSO 5 has been updated to take account of the publication of the National Sustainable Mobility Policy; the NTA's Active Travel Investment Programme; the Electric Vehicle Charging Infrastructure Strategy 2022-2025 and the National Transport Demand Management Strategy. In addition to amendments to the existing text, four new action points are included in the description of this NSO in Chapter 10 as follows:

- Improve connections and walking routes in accordance with the principles of universal design so as to optimise journeys undertaken by foot and enhance pedestrian comfort and safety,
- Enable more effective traffic management within and around cities and towns through demand management measures including the re-allocation of inner-city urban road-space in favour of bus-based public transport services, shared mobility services and walking/cycling facilities;
- Deliver Transport Orientated Development at scale at suitable brownfield and greenfield locations in cities and metropolitan areas, along high-capacity public transport corridors with a focus on land management, institutional and funding arrangements needed to accelerate this type of development.
- Support delivery of Electric Vehicle charging at a national level in line with Climate Action Plan targets to transition.

These amendments and additions are welcomed by the Assembly as they are supportive of our work in the context of the Dublin MASP; delivery of the Smart and Sustainable Mobility Accelerator Programme (SSMA), and; implementation of the EU Just Transition Fund programme.

NSO 6 - A Strong Economy Supported by Enterprise, Innovation and Skills

The text of this NSO has been updated with detailed reference to the Government's White Paper on Enterprise 2022-2030 and notes that the work of Enterprise Ireland (EI), IDA Ireland and the Local Enterprise Offices will be critical to achieving this ambition.

Under 'Supporting Entrepreneurialism and Building Competitive Clusters', this NSO notes that the Department of Enterprise, Trade and Employment has committed to devising and introducing a centrally coordinated, cross-Government approach to clustering that will encourage the formation and strengthening of national cluster organisations, leveraging the benefits of proximity and colocation to boost productivity. It notes that the identification of priority areas for enhanced clustering will be underpinned by an assessment of competitive strengths and potential opportunities against a range of factors, including the scale of potential impact, innovation intensity and research capability, as well as market direction. The Draft First Revision notes the role of collaboration with the higher and further education sectors and support for increasing the competitiveness of the business environment in the regions. The Draft First Revision also notes that the Department of Further and Higher Education, Research, Innovation and Science is leading a whole of Government approach to the implementation of Ireland's National Research and Innovation strategy, Impact 2030, through Regional Enterprise Plans, as well as support for Smart Specialisation to encourage the maximising of sectoral strengths through clustering and the scaling of Ireland's existing areas of research excellence.

While the Assembly welcomes these amendments, the Assembly considers that this NSO could be substantially strengthened through direct reference to the National Smart Specialisation Strategy for Innovation 2022-2027 and by referencing the role of the Regional Assemblies, who, through implementation of the RSEs and associated engagement with key stakeholders at all levels, drive regional economic development and ensure that it is strategic, coordinated and sustainable. Furthermore, all three of Ireland's regions – the Eastern and Midland Region, Southern Region and the Northern and Western Region – have received the designation of 'Regional Innovation Valleys' (RIV) by the European Commission. This followed a coordinated process between the Department of Enterprise, Trade and Employment and the Regional Assemblies, with the European Commission. This label recognises the Regions' potential as hubs of innovation and economic growth within a network of 149 similarly designated regions across Europe. Regions selected to receive a RIV label are committed to:

- Strengthening their Research & Innovation (R&I) ecosystem
- Enhancing the co-ordination and directionality of their R&I policy and investment towards key EU priorities
- Engaging in R&I collaboration between more and less advanced regions with complementary smart specialisation strategies.

The text of this NSO has also been substantially developed with regard to 'Digital and Data Innovation'. It makes reference to the objectives of 'Harnessing Digital – The Digital Ireland Framework; Ireland's Industry 4.0 Strategy 2020-2025 and AI - Here for Good: National Artificial Intelligence Strategy for Ireland.' The Assembly welcomes these amendments, in addition to the recognition within the text that Ireland's international position as a leading location for ICT contributes to wider synergies in the economy, as well as the need to ensure that a digital divide does not emerge between urban and rural areas, and between different regions. This is supportive of the Assembly's work in relation to

digitalisation measures in rural areas in the context of our participation on the Next2Met and ORIGINN Interreg Europe projects. Notwithstanding, the Assembly considers that this NSO could be strengthened substantially through reference to a wider range of schemes and initiatives supported by the Government relating to digital transformation. This could include local authority initiatives as well as the EU Just Transition Digital Transformation Programme being delivered by Fáilte Ireland as part of the EU Just Transition Fund programme, for which the Assembly is managing authority.

NSO 7 - Enhanced Amenities and Heritage

The Assembly welcomes the added reference to the European Regional Development Fund (ERDF), for which the Regional Assemblies are managing authorities, which will support projects that promote the conservation and adaptive reuse of our vacant built heritage stock and drive the regeneration of cities and towns, including the Town Centre First Heritage Revival (THRIVE) scheme for the period 2021 - 2027. Notwithstanding, the Assembly considers that this NSO could be strengthened substantially through reference to a wider range of schemes and initiatives supported by the Government relating to natural and cultural heritage, as well as amenity development for healthy placemaking and tourism. For example, Fáilte Ireland is delivering the Regenerative Tourism and Placemaking Scheme for Ireland's Midlands 2023-2026 and the EU Just Transition Tourism Learning Network Programme under the EU Just Transition Fund.

NSO 8 - Transition to a Low Carbon and Climate Resilient Society

The text of this NSO has been substantially updated in the Draft First Revision to acknowledge the diverse and wide-ranging impacts of climate change on Ireland's environment, society, and economic development, including on managed and natural ecosystems, water resources, agriculture and food security, human health, and coastal zones. It sets out the binding targets of the Climate Action and Low Carbon Development (Amendment) Act enacted in 2021 and notes that sustainable land use management is required in order to achieve a balance between the built environment, natural environment, biodiversity and climate, with reference to the NPF commitment to the achievement of compact and sustainable growth, supporting the provision of sustainable transport options, water services delivery and the delivery of renewable energy development while protecting and where possible enhancing and restoring our natural environment in order to ensure sustainable development for our planet and future generations.

The updated text notes that adaptation measures will be required to respond locally specific, place-based responses, which address not only climate impacts but also integrate coherently with local social, economic and ecological systems. It further notes that the electricity sector faces a significant challenge to meet its requirements under the targets set out in the Climate Action Plan 2023 and that electricity will also play a key role in the decarbonisation of other sectors through electrification, including transport, heating, and industry. It states that the accelerated delivery of additional renewable electricity generation is therefore essential for Ireland to meet its climate targets, reduce its greenhouse gas emissions, and improve its energy security by reducing reliance on imported fossil fuels and diversifying its electricity supply. To this end, it notes that Smart Specialisation will increase the regional uptake of new advanced technologies to increase the reach of the green transformation across Irish enterprise.

While the Assembly welcomes these updates, it is considered that the text could be strengthened in relation to implementation and resourcing. By example, as set out in Section 2.9 of this submission, the Assembly recommends that appropriate methodological guidance for capacity allocations for onshore wind and solar is provided to the Regional Assemblies by the Department, in addition to appropriate expertise and resourcing (human and financial) to support achievement of the targets

based on the best available scientific evidence and in accordance with legislative requirements. Furthermore, the text should be updated to reference the most recent CAP, in place of Climate Action Plan 2023.

The section also references the launch of Ireland's 4th National Biodiversity Action Plan 2023-2030 in January 2024, noting that implementation of actions within the Plan will contribute towards the 2050 vision that 'Biodiversity in Ireland is valued, conserved, restored and sustainably used, maintaining ecosystem services, sustaining a healthy planet and delivering benefits essential for all people'. Finally, in relation to Green Energy, this NSO notes that District Heating Networks will be developed, where technically feasible and cost effective, to assist in meeting renewable heat targets and reduce Ireland's GHG emissions. The Assembly welcomes these updates and additions.

NSO 9 - Sustainable Management of Water and other Environmental Resources

The text of this NSO has been substantially changed in the Draft First Revision. Detail is provided in relation to the Water Services Policy Statement 2018-2025 as provided for under Section 32A of the Water Services (No.2) Act 2013 (as amended).

Regarding Waste, the text notes that the Regional Waste Management Planning Offices are currently finalising a new National Waste Management Plan, informed by, inter alia, the NPF. The Assembly notes that the National Waste Management Plan for a Circular Economy 2024-2030 has already been adopted by the 31 local authorities and the text of the revised NPF should be updated to reflect same.

The updated text also refers to the Circular Economy and Miscellaneous Provisions Act 2022 which contains strengthened provisions in relation to waste management plans, by requiring waste management plans to include indicators and targets relating to the use of products and materials that have been re-used, re-manufactured or repaired.

As in the 2018 NPF, this NSO notes that Regional Spatial and Economic Strategies and the core strategies of MASPs and city and county development plans will support national and regional waste policy and the efficient use of resources. The Assembly notes that Section 29(13)(a) of the Planning and Development Bill 2023 requires that a RSES and a metropolitan area strategic plan within such a strategy shall include measures to secure the effective implementation and monitoring of the regional spatial and economic strategy and metropolitan area strategic plan, including waste management.

NSO 10 - Access to Quality Childcare, Education and Health Services

This section is updated to take account of changes since the publication of the NPF in 2018. It is now noted that, in particular, the health system will need to respond to the projected change to our population increase and age distribution, through the provision of services and supports for an ageing population.

The Assembly notes that no substantive updates have been included pertaining to childcare.

In relation to education, it is now noted that the NPF is aligned with the National Strategy for Higher Education to 2030, and the Future FET: Transforming Learning - The National Further Education and Training (FET) Strategy.

The most significant amendments are in relation to health. Most significantly, the text notes that the ongoing implementation of Sláintecare and the Strategic Healthcare Investment Framework will have an important influence on the type and scale of regional healthcare services. Following this the priorities of Sláintecare and the Strategic Healthcare Investment Framework are outlined in detail under the following headings:

- Healthy Communities and Healthcare Services in the Community
- Services for Older People
- Integrated Health and Social Care Services
- Mental Health – A Vision for Change
- Acute Hospital Services

The Assembly notes these amendments and would welcome further engagement with the Department and relevant stakeholders to determine how best this NSO can be reflected in the revised RSES to support the delivery of the revised NPF.

Finally, the Assembly notes the typographical error in the name of this NSO. The word ‘Qualify’ should be corrected to ‘Quality’ in the revised NPF.

2.11 Appendices

The Draft First Revision contains two appendices.

Appendix 1 sets out the Draft National Policy Objectives (NPO) 2024 which are cross-referenced with the NPO number in the 2018 NPF. The Draft NPOs have been considered through the body of this submission.

Appendix 2 sets out population and employment figures for resident workers and total jobs for each settlement according to the 2022 Census of Population. This includes a jobs to resident worker ratio. The Assembly notes that the jobs ratio figures have been applied in a different fashion compared to the 2018 NPF. That is, in the Draft First Revision, the figure for resident workers is based on fixed work destination only and excludes all mobile workers (construction, delivery drivers etc.) and those with an unknown destination i.e., destination was not able to be coded on the CSO form. These two groupings form a substantial figure and account for about 20% of the national workforce. As such the Local Jobs versus Resident Workers ratio between NPF 2018 and Draft First Revision use different methodologies. The Assembly strongly recommends that the figures included in the revised NPF are comparable to those in the 2018. In any case, the methodology for the calculation should be included in the Draft First Revision and any variation from the methodology applied in the 2018 NPF should be clearly highlighted.

2.12 Environmental Assessments

The Assembly notes the preparation of the Draft First Revision in tandem with the required environmental assessments, namely Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA).

The SEA environmental report sets out the iterative process to date including an assessment of the overall environmental effects arising from the provisions of the Draft First Revision. Taking into account the integration of various recommendations and mitigation measures arising from the SEA, AA and SFRA processes into the Draft First Revision, which are detailed in the environmental report, it was determined that significant residual adverse environmental effects will not occur through implementation of the Draft First Revision. Notwithstanding, having reviewed the Strategic Environmental Assessment (SEA) Environmental Report, the Assembly notes the following:

- Appendix E ‘Review of Regional and Local Level Plans and Programmes’ has not been updated to reflect the publication of the three Regional Spatial and Economic Strategies in 2019 and 2020. The Assembly must therefore assume that the Regional Spatial and Economic Strategy for the Eastern and Midland Region has not been reviewed as part of the SEA process. The Assembly

strongly recommends that this section is updated and that a review of the three RSEs is undertaken to inform the revised SEA as appropriate.

- Appendix E ‘Review of Regional and Local Level Plans and Programmes’ contains a general entry for ‘County Development Plans’. The Assembly strongly recommends that this section is updated and that a review of the 31 city and county development plans is undertaken to inform the revised SEA as appropriate.
- The SEA process is required to inform the decisions being taken in revising the NPF and therefore the SEA Report must include analysis capable of informing decisions. Quantitative analysis of greenhouse gas emissions is an important consideration, however the Assembly notes that no such analysis has been undertaken. Such an analysis should address use of existing transport modelling capabilities to address emissions impacts of spatial planning decisions and estimation of embodied carbon impacts of both spatial planning decisions (presumably higher material usage from more dispersed patterns) and of construction technologies. It is possible to estimate emissions due to transport under various spatial planning and transport infrastructure scenarios. Existing modelling capacity held by the NTA already does this for large-scale planning applications and could be used to assist with estimation of the emissions impacts of the spatial planning choices being made in the NPF. It is likely that the results of this analysis would result in a stronger emphasis in the NSOs and NPOs on a number of aspects of the transition to sustainable transport, including: the adoption and detailing of transport-oriented development as a principle to be applied in a tailored fashion at multiple levels; greater emphasis on active travel and designing in filtered permeability; greater emphasis on public transport infrastructure, interchange and integration, and; advice on Area-Based Transport Assessment.
- The approach to the assessment of alternatives with +/- results for almost all boxes in the matrix demonstrates the lack of value in the SEA process carried out in terms of informing the decisions taken. To meet the requirements of an effective SEA process, the Assembly recommends that the analysis should estimate the carbon emissions impacts of the alternatives considered.
- The Assembly recommends that the SEA should explicitly consider compliance with environmental legal obligations, including the Climate Change and Low Carbon Development Act 2021.
- The Assembly considers that the approach to indicators and monitoring is inadequate, as demonstrated by experience with NPF monitoring to date. The approach to monitoring set out in the current SEA Report will continue this trend if left unaddressed. The Assembly recommends that an additional NPO be prepared to develop an appropriate set of SEA environmental indicators to implement a coordinated approach to measuring and monitoring economic prosperity, environmental sustainability and climate action across all regions. Such an approach would take account of the Espoo Convention and give effect to the second and third recommendations of the Expert Group as set out at Section 2.1 above.
- The Assembly notes that there are no actions in the NPF in relation to the embodied carbon aspects of development. Embodied carbon represents 14% of national emissions. The Environmental Report contains the following mitigation action for all NPOs: *“Support the implementation of the guidance and actions contained in the Reducing Embodied Carbon in Cement and Concrete through Public Procurement in Ireland report from DETE as a NPF policy / supporting text.”* The Assembly notes that this mitigation action only applies to public procurement, and only to cement and concrete (not other high-carbon construction materials such as steel or polystyrene). While this action is in the SEA Report, it is not in the revised NPF and therefore its status is unclear.

- The issue of ‘managed retreat’ was raised in the scoping for the SEA and listed as a reasonable alternative to be considered. The SEA report responds in a table under the heading “*How Has the Suggestion Been Considered within Alternatives*” with “*SFRA is being undertaken on NPF Revision.*” The Assembly notes that the SFRA does not address this issue.
- It is not clear if the Draft First revision has quantified or included measures to mitigate additional emissions of 6 MT per annum, resulting from the increased population projections. The Regional Assembly suggests that this be included in order to ensure consistency with the carbon budgets and Climate Action Plan 2024.

The Draft First Revision is subject to Appropriate Assessment (AA) and a Natura Impact Report (NIR) has recorded the decisions that were taken during its preparation. It concluded, following an examination, analysis and evaluation of the relevant information, including in particular the nature of the predicted impacts associated with the Draft First Revision, that the Draft First Revision will not adversely affect (either directly or indirectly) the integrity of any European site, either alone or in combination with other plans or projects. The AA process is ongoing and will inform and be concluded at adoption of the Draft First Revision to the National Planning Framework.

A Strategic Flood Risk Assessment (SFRA) has been undertaken alongside the preparation of the Draft First Revision, the SEA and the NIR. The SFRA is required by ‘The Planning System and Flood Risk Management Guidelines for Planning Authorities’ (2009) and associated Department of the Environment, Community and Local Government Circular PL2/2014. The recommendations from the SFRA have been integrated into the Draft First Revision.

3.0 Recommendations

The Regional Assembly welcomes the Draft First Revision to the NPF and makes the following recommendations and observations for consideration in the finalisation of the First Revision and the environmental assessment of same.

Strategic Vision

1. a) The Assembly considers that the strategic vision of the revised NPF should make reference to the key EU funds which drive and support the aims of the National Planning Framework, for both urban and rural areas. At the regional level, these include the European Regional Development Fund (ERDF) and the EU Just Transition Fund (EU JTF), both of which are part of the European Cohesion Policy and are managed by the Regional Assemblies.
Reason: While the Draft First Revision references the Urban and Rural Regeneration and Development Funds, reference to wider funding sources which support the implementation of the NPF, at a local and regional level, would provide a more complete picture in relation to NPF funding.
- b) In Section 1.4 of the First Draft Revision, the Assembly considers that the Regional Assemblies should be directly referenced at point 2 under ‘2023 Expert Group Review of 2018 NPF Strategy and Implementation’ given that the MASPs are integrated elements of the statutory Regional Spatial and Economic Strategies, which are made by the Regional Assemblies.
Reason: As prescribed in the Planning and Development Act 2000 (as amended) and the Planning and Development Bill 2023, the Regional Assemblies are responsible for making and implementing the MASPs.

- c) The Assembly considers that the revised NPF would benefit from more direct mapping of the UN Sustainable Development Goals (SDGs) onto the NSOs.
Reason: To more clearly demonstrate alignment between the objectives of the NPF and the SDGs, and to assist with the implementation of NPO 14 which has been updated in the Draft First Revision to ensure progress toward national achievement of the SDGs, including through the mapping of sustainability to subordinate policies.

A New Way Forward

2. a) Section 2.4 of the Draft First Revision identifies additional population figures for the Eastern and Midland Region and acknowledges that there is “*significant unmet demand for housing in Dublin and the Mid-Eastern Region in particular*”. The Assembly also notes the need for approximately 50,000 additional houses per annum to 2040 for the Country. The Assembly considers that housing figures required to accommodate the desired population growth should be set out as part of the NPF or in an accompanying Roadmap.
Reason: To inform the hierarchy of statutory planning documents to ensure the successful implementation of the Draft Revision to the NPF, and to avoid a policy vacuum.
- b) The Assembly considers that the updated ‘Implementation Roadmap’ for the NPF should be published alongside the Draft First Revision and subject to public consultation as part of the revision process.
Reason: To ensure consistency between actions contained in the roadmap, the objectives of the revised NPF and other policies of the Government.
- c) The Assembly recommends that NPO 11, which relates to planned growth at settlement level, should make specific reference to alignment with the Regional Spatial and Economic Strategies.
Reason: To ensure the effective revision and implementation of the NPF and the RSEs.

Effective Regional Development

3. a) In Section 3.2 of the Draft First Revision, the Assembly recommends that the intraregional imbalance within the Eastern and Midland Region, whereby the Midland Region is currently facing additional economic challenges, including those linked to the just transition process, should be more comprehensively addressed.
Reason: To ensure that effective regional development can be supported through the NPF and the RSEs in line with the recommendations of the OECD report - ‘Towards Balanced Regional Attractiveness in Ireland: Enhancing the Delivery of the National Planning Framework.’
- b) The Assembly considers that the Draft First Revision should include an updated provision to support the preparation and implementation of a Regional Priorities Programme to shape and inform delivery of ongoing and future initiatives which support the delivery of future development in a way that enhances and reinforces its urban and rural structure and a move towards self-sustaining, rather than commuter driven activity.
Reason: To ensure effective implementation of the NPF and the RSEs.
- c) In the ‘Dublin City and Metropolitan Area’ section of Section 3.2 of the Draft First Revision, the Assembly suggests that the Dublin MASP and its coordinating role should be referenced.
Reason: To ensure the completeness and accuracy of the revised NPF in line with the second and third recommendations of the Expert Group as set out in Section 1.4, and to ensure the effective revision and implementation of the NPF and the RSEs.

- d) The City Edge Project, Dublin, is included as a case study under Section 3.2 of the Draft First Revision. The Assembly considers that this is premature as there has been no related development on the ground to date, and should be reconsidered. The inclusion of a similar initiative which is at a more advanced stage of implementation would be welcomed by the Assembly, for example, Cherrywood, Co. Dublin.
Reason: To ensure that the case studies included in the revised NPF are optimised to assist effective implementation of the NPF.

Making Stronger Urban Places

4. a) Implementation of the Metropolitan Area Strategic Plans (MASPs), including the Dublin MASP, is not supported by any legislative framework. The Assembly considers that the revised NPF should support the adoption of a new statutory mechanism relating to MASP implementation, that enables the Regional Assemblies to coordinate and prioritise MASP implementation with key stakeholders.
Reason: To ensure effective implementation of the RSEs, with particular reference to the MASPs which are included therein, in line with the recommendations of the Expert Group Review of 2018 NPF Strategy and Implementation.
- b) The Assembly recommends the inclusion of NPOs relating to ‘smart specialisation’ and ‘clustering’ in the revised NPF, and reference to the role of the Regional Assemblies and their Regional Spatial and Economic Strategies in the implementation of same.
Reason: To ensure that the NPF provides actionable objectives in support of ‘smart specialisation’ and ‘clustering’ to strengthen the relationship between the nine Regional Enterprise Plans, the Regional Spatial and Economic Strategies, and national enterprise and innovation policy as noted in the Draft First Revision.
- c) Section 4.3 of the Draft First Revision updates the narrative under the subsection ‘Ireland’s Towns’ which refers to the inclusion of Key Towns in NPO 15, however, the Assembly notes that this reference to Key Towns has not been included in the wording of the NPO. In this respect the Assembly recommends the inclusion of Key Towns in the wording of NPO 15.
Reason: In the interest of consistency and clarity.
- d) The Assembly considers that at Section 4.3, the revised NPF should define “Key Town” as set out in the Planning and Development Bill 2023; should clearly set out the important role of Key Towns, and; include an NPO in support of same which recognises the role of the Regional Assemblies.
Reason: To ensure consistency between the revised NPF and the Planning and Development Bill 2023, and to ensure effective implementation of the NPF and the RSEs.
- e) The text of the ‘Shanganagh Castle – Land Development Agency’ case study should be updated to note that Woodbrook–Shanganagh is located on the North-South Corridor (DART expansion) which is identified as a strategic development corridor in the Dublin Metropolitan Area Strategic Plan (MASP) of the RSEs for the Eastern and Midland Region.
Reason: In the interest of consistency and clarity and to ensure effective implementation of the NPF and the RSEs.
- f) The Assembly recommends that the NPF provides further detail regarding the development of performance criteria referenced in NPO 22 in relation to Performance-Based Design Standards.

Reason: To ensure that the achievement of well-designed high-quality outcomes is adequately supported in the revised NPF to support the implementation of the NPF and the RSEs.

Planning for Diverse Rural Places

5. a) At Section 5.3, the Draft Revision notes that a new package of supports will be launched in 2024 to expand on the delivery of the objectives within Town Centre First. The Assembly recommends that the text should be updated in relation to the referenced package of supports, and to also include the Town Centre First Heritage Revival (THRIVE) scheme.
Reason: To future-proof the revised NPF and ensure that all information is current at the time of publication.

- b) At Section 5.5 of the Draft First Revision, the Assembly notes that the reference to the RRDF fifth call in early 2024 is written in the future tense, despite predating the Draft First Revision. Furthermore, this section does not reference the EU Just Transition Fund or any of its schemes, all of which focus on promoting a balanced socio-economic transition in the wider-Midlands region. The Assembly recommends that this section is updated and includes reference to both the EU Just Transition Fund and the ERDF Town Centre First Heritage Revival (THRIVE) scheme.
Reason: To future-proof the revised NPF and ensure that all information is current at the time of publication.

People, Homes and Communities

6. a) At Section 6.2, the Assembly considers that the text of NPO 38 should be amended to reference the term ‘filtered permeability’ as defined in the NTA’s Best Practice Guide on Permeability in Existing Urban Areas (2015) and as referenced in Section 8.8 of the Greater Dublin Area Transport Strategy 2022-2042. That is, the Assembly strongly recommends that NPO 38 should be updated to read: *“Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility, including filtered permeability, to both existing and proposed developments and integrating physical activity facilities for all ages.”*
Reason: In the interest of clarity and to support the effective implementation of the NPF and the RSEs.

- b) At Section 6.6 of the Draft First Revision, the Assembly considers that the inclusion of explanatory text would add value to this Riverside Cottages, Templeogue, Infill scheme case study.
Reason: To ensure that the case studies included in the revised NPF are optimised to assist effective implementation of the NPF.

- c) At Section 6.6 of the Draft First Revision, the Assembly considers that this section should be strengthened through the acknowledgement of the future role of Regional Assemblies in making provision for the location of housing and would welcome further clarity regarding any potential role for the Regional Assemblies in informing the Housing Need Demand Assessments (HNDA) process.
Reason: Section 29(1)(d) of the Planning and Development Bill 2023 requires that the RSEs of the Regional Assemblies shall make provision for the location of housing, including provision to meet any national and regional population growth targets set out in the National Planning Framework as between the functional areas of the planning authorities in the region and the relevant population and housing targets to be included in the housing development strategy of each planning authority.

Realising our Island and Marine Potential

7. a) The Assembly considers that the Figure 7.2 should note that the Planning and Development Bill 2023 requires that a RSES shall make provision for a 'strategy relating to marine and coastal matters that facilitates the coordination of land-sea interactions for coastal planning authorities within the region' and more comprehensively demonstrate the relationship between planning and maritime policy.
Reason: To ensure consistency between the revised NPF and the Planning and Development Bill 2023, and to ensure effective implementation of the NPF and the RSESs.
- b) At Section 7.3 of the Draft First Revision, the revised NPF should name each of the ports of regional significance and name equivalent ports in Northern Ireland to provide a more comprehensive all-island focus.
Reason: In the interest of clarity and to have regard to the potential of the all-island economy which is supported in the Draft First Revision.
- c) The Assembly notes that the Planning and Development Bill 2023 requires that a Regional Spatial and Economic Strategy shall make provision for a 'strategy relating to coastal zone management as a consequence of sea level change, including the identification of strategic infrastructure', as well as 'a flooding and flood management plan for the region'. Section 7.4 of the revised NPF should make reference to these requirements in reference to plan-led interventions.
Reason: To ensure consistency between the revised NPF and the Planning and Development Bill 2023, and to ensure effective implementation of the NPF and the RSESs.
- d) The Assembly notes that the Planning and Development Bill 2023 requires that a Regional Spatial and Economic Strategy shall make provision for a 'strategy relating to renewable energy to (i) meet national targets, (ii) identify and facilitate electricity grid infrastructure, including upgrade projects and support infrastructure, (iii) make provision for energy security, and (iv) promote steps for coordination and cooperation between public bodies, and suggests that the revised NPF should refer to same at Section 7.5 in reference to the provision of enabling infrastructure for offshore renewable energy.
Reason: To ensure consistency between the revised NPF and the Planning and Development Bill 2023, and to ensure effective implementation of the NPF and the RSESs.

Working with Our Neighbours

8. a) The Assembly considers that an outline of the role of Regional Assemblies in shaping cross border interactions should be included at Section 8.3 of the Draft First Revision.
Reason: Cross-border coordination is a significant element of the economic strategies of the Regional Assemblies, playing a critical role in supporting economic growth and competitiveness, thereby supporting the implementation of the NPF and the economic policies of the Government.
- b) A direct reference to local authorities, regional assemblies and government departments in the Republic of Ireland should be included in NPO 58.

Reason: To emphasise the importance of local authorities, regional assemblies and government departments in the Republic of Ireland in supporting and developing the economic potential of the Dublin-Belfast Economic Corridor and in particular the core Drogheda-Dundalk-Newry network and to promote and enhance its international visibility.

Climate Transition and Our Environment

9. a) The Assembly considers that the subsection on the circular bioeconomy under Section 9.2 of the Draft First Revision should be updated to reference the publication of the Bioeconomy Action Plan 2023-2025, the purpose of which is to further develop Ireland's bioeconomy in delivering the vision of the 2018 National Policy Statement on the Bioeconomy. This includes actions for communities, regions and communities aligned with NPF objectives.

Reason: To, as much as is possible, future-proof the revised NPF and ensure that all information is current at the time of publication, and to support implementation of the NPF and the RSEs.

- b) The Assembly considers that Figure 9.1 of the Draft First Revision relating to the number of retrofit property upgrades should be updated to include available 2024 data. The source of the data should also be clarified.

Reason: To, as much as is possible, future-proof the revised NPF and ensure that all information is current at the time of publication.

- c) The Assembly recommends that appropriate methodological guidance for regional renewable electricity capacity allocations as set out in Table 9.1 of the Draft First Revision is provided to the Regional Assemblies by the Department, in addition to appropriate expertise and resourcing (human and financial) to support achievement of the targets based on the best available scientific evidence and in accordance with legislative requirements.

Reason: To ensure effective implementation of the NPF and the RSEs.

- d) Regarding Section 9.3 of the Draft First Revision, the Assembly notes that no definition of 'natural capital' is provided and that the inclusion of same would be beneficial.

Reason: In the interest of clarity and to ensure effective implementation of the NPF and the RSEs.

- e) The Assembly notes that the term 'ecosystem services' is not defined in the Draft First Revision and recommends the inclusion of the EU definition as follows:

"Ecosystem services are the services that an ecosystem supplies and on which humans depend. Ecosystem services from which humans benefit are often categorised as follows:

- provisioning services such as food, water, wood, fibre and genetic resources;
- regulating services such as climate regulation, floods, disease and water quality;
- cultural services such as recreation and ecotourism;
- supporting services such as soil formation, pollination and nutrient cycling."

Reason: In the interest of clarity and to ensure effective implementation of the NPF and the RSEs.

- f) In relation to Section 9.3 of the Draft First Revision, the Assembly recommends that the revised NPF includes an objective to support the development of a standardised green infrastructure and ecosystem services scoring and mapping approach to allow for a coordinated approach to same.

Reason: To ensure effective and consistent implementation of the NPF and the RSEs.

- g) The Assembly considers that green belts, and green and blue spaces, form part of the green and blue infrastructure network and should not be considered separately. The Assembly therefore recommends that both subsections within Section 9.3 of the Draft First Revision should be amalgamated under the heading of 'Green and Blue Infrastructure'.
Reason: In the interest of clarity and to ensure effective implementation of the NPF and the RSEs.
- h) With reference to the subsection on 'Noise Quality' at Section 9.4 of the Draft First Revision, the Assembly considers that the title of this subsection should be amended to 'Environmental Noise'.
Reason: In the interest of clarity and to ensure effective implementation of the NPF and the RSEs.

Implementing the National Planning Framework

- 10. a) Regarding Section 10.1 of the Draft First Revision, the Assembly considers that the recommendations of the OECD report on enhancing the delivery of the NPF and the recommendations of the Expert Group for the First Revision should be better reflected in the revised NPF.
Reason: To ensure effective and evidence-based implementation of the NPF and the RSEs.
- b) The Assembly considers that the report and recommendations of the Congress of Local and Regional Authorities titled "Monitoring of the application of the European Charter of Local Self-Government in Ireland" should be reflected in the revised NPF.
Reason: To ensure effective and evidence-based implementation of the NPF and the RSEs.
- c) With regard to phasing at Section 10.1 of the Draft First Revision, the Assembly considers that the text should be updated to clearly state the reference/baseline year of relevance for the growth figures as referenced.
Reason: In the interest of clarity and to ensure effective implementation of the NPF and the RSEs.
- d) Regarding 'Regional Spatial and Economic Strategies' at Section 10.2 of the Draft First Revision, the Assembly recommends that the text is amended to state that "*Preparation of the strategies involved the Regional Assemblies, working together with relevant local authorities and stakeholders, including the Minister and Department of Housing, Local Government and Heritage and other interests, to put in place a regional co-ordination framework for statutory development plans at local authority level.*"
Reason: In the interest of clarity and to ensure effective implementation of the NPF and the RSEs.
- e) The Assembly recommends that the Draft First Revision set out the legislative basis or purpose of the Local Economic and Community Plans (LECPs) as referenced at Section 10.2.
Reason: In the interest of clarity and to ensure effective implementation of the NPF and the RSEs.
- f) The Assembly recommends that the second paragraph of the subsection on 'Metropolitan Area Strategic Planning' at Section 10.2 of the Draft First Revision is deleted, as it implies that RSEs do not deal with city and metropolitan issues.
Reason: In the interest of clarity and to support the effective implementation of the NPF and the RSEs.

- g) The Assembly recommends that the text of NPO 92 should be updated to reference the Regional Assemblies as the appropriate authorities and to remove the phrase ‘in tandem with’ which implies that the MASPs are separate to the RSEs. That is, the Assembly strongly recommends that NPO 92 should be updated to read: *“Metropolitan Area Strategic Plans for the Dublin, Cork, Limerick, Galway and Waterford Metropolitan areas and in the case of Dublin and Cork, to also address the wider city region, shall be reviewed by the Regional Assemblies as part of a review of the relevant Regional Spatial and Economic Strategy.”*
Reason: In the interest of clarity and to support the effective implementation of the NPF and the RSEs.
- h) The Assembly considers that the subsection on ‘Integrating Spatial and Transport Planning’ at Section 10.2 of the Draft First Revision should be updated by making direct reference to the Dublin MASP as the key element of the RSEs as regards consistency with the NTA Transport Strategy for the GDA.
Reason: In the interest of clarity and to support the effective implementation of the NPF and the RSEs.
- i) The Assembly considers that the Regional Assemblies should be included in this process of identifying suitable opportunities for Transport Orientated Development (TOD) at scale in the five cities, aligned to planned investment in the public transport network and, in so-doing, support the coordinated implementation of NPO 95.
Reason: To ensure effective and consistent implementation of the NPF and the RSEs.
- j) The Assembly considers the text of the NPF could be strengthened by setting out the key elements of the Section 28 Ministerial Guidelines on ‘Housing Supply Target Methodology for Development Planning’ (as referenced under Section 10.2 of the Draft First Revision) and explaining in a practical sense, how they can support the implementation of the NPF and the RSEs to ensure a coordinated and balanced approach to future population and housing requirements across urban and rural areas.
Reason: In the interest of clarity and to support the effective implementation of the NPF and the RSEs.
- k) The Assembly considers that NPO 102 could be strengthened by making reference to the appropriate authority or authorities who will develop and implement the new approaches.
Reason: In the interest of clarity and to support the effective implementation of the NPF and the RSEs.

National Strategic Outcomes

11. a) The Assembly notes that the numbering designation of the NSOs are not consistent between the infographic under Section 1.2 and as listed in Chapter 10, of the Draft First Revision. Inconsistencies are highlighted in red in the table below and should be remedied in the revised NPF.

NSOs as listed on page 5 (consistent with 2018 NPF numbering)	NSOs as detailed in Chapter 10
NSO 1 - Compact Growth NSO 2 - Enhanced Regional Accessibility NSO 3 - Strengthened Rural Economies and Communities NSO 4 - Sustainable Mobility	NSO 1 - Compact Growth NSO 2 - Enhanced Regional Accessibility NSO 3 - Strengthened Rural Economies and Communities NSO 4 - High-Quality International Connectivity

<p>NSO 5 - A Strong Economy supported by Enterprise, Innovation and Skills</p> <p>NSO 6 - High-Quality International Connectivity</p> <p>NSO 7 - Enhanced Amenity and Heritage</p> <p>NSO 8 - Transition to a Low Carbon and Climate Resilient Society</p> <p>NSO 9 – Sustainable Management of Water, Waste and other Environmental Resources</p> <p>NSO 10 - Access to Quality Childcare, Education and Health Services</p>	<p>NSO 5 - Sustainable Mobility</p> <p>NSO 6 - A Strong Economy Supported by Enterprise, Innovation and Skills</p> <p>NSO 7 - Enhanced Amenities and Heritage</p> <p>NSO 8 - Transition to a Low Carbon and Climate Resilient Society</p> <p>NSO 9 - Sustainable Management of Water and other Environmental Resources</p> <p>NSO 10 - Access to Qualify Childcare, Education and Health Services</p>
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Reason: In the interest of clarity and consistency within the revised NPF.

- b) The Assembly considers that the text of NSO 1 in Chapter 10 of the Draft First Revision should reference the Town Centre First Heritage Revival Scheme (THRIVE).

Reason: In the interest of clarity and to support the effective implementation of the NPF.

- c) In Chapter 10, the Assembly considers that the NSO pertaining to High-Quality International Connectivity should reference significant ports in Northern Ireland given the renewed focus in the Draft First Revision on the all-island economy.

Reason: In the interest of clarity and to support the effective implementation of the NPF and the RSEs.

- d) The Assembly considers that NSO 6 in Chapter 10 could be substantially strengthened through direct reference to the National Smart Specialisation Strategy for Innovation 2022-2027 and by referencing the role of the Regional Assemblies, who, through implementation of the RSEs and associated engagement with key stakeholders at all levels, drive regional economic development and ensure that it is strategic, coordinated and sustainable. Furthermore, the Assembly considers that the designation of all three of Ireland’s regions as ‘Regional Innovation Valleys’ (RIV) by the European Commission should be referenced in the text of this NSO.

Reason: In the interest of clarity and completeness and to support the effective implementation of the NPF and the RSEs.

- e) The Assembly considers that NSO 6 in Chapter 10 could be further strengthened through reference to a wider range of schemes and initiatives supported by the Government relating to digital transformation. This could include local authority initiatives as well as the EU Just Transition Digital Transformation Programme being delivered by Fáilte Ireland as part of the EU Just Transition Fund programme, for which the Assembly is managing authority.

Reason: In the interest of clarity and completeness and to support the effective implementation of the NPF and the RSEs.

- f) The Assembly considers that NSO 7 could be strengthened substantially through reference to a wider range of schemes and initiatives supported by the Government relating to natural and cultural heritage, as well as amenity development for healthy placemaking and tourism. For example, Fáilte Ireland is delivering the Regenerative Tourism and Placemaking Scheme for Ireland’s Midlands 2023-2026 and the EU Just Transition Tourism Learning Network Programme under the EU Just Transition Fund.

Reason: In the interest of clarity and completeness and to support the effective implementation of the NPF and the RSEs.

- g) The Assembly considers that the text of NSO 8 ‘Transition to a Low Carbon and Climate Resilient Society’ should reference the implementation and resourcing requirements.

Reason: In the interest of clarity and completeness and to support the effective implementation of the NPF and the RSEs.

Appendices

12. a) In reference to Appendix 2, the Assembly strongly recommends that the figures included in the revised NPF are comparable to those in the 2018 NPF. Furthermore, the methodology for the calculation should be included in the Draft First Revision and any variation from the methodology applied in the 2018 NPF should be clearly highlighted.

Reason: In the interest of clarity and to support the effective, evidence based, implementation of the NPF and the RSEs.

Environmental Assessment

13. a) The Assembly recommends that Appendix E of the SEA Environmental Report - 'Review of Regional and Local Level Plans and Programmes' is updated to include references to the three Regional Spatial and Economic Strategies and that a review of the three RSEs is undertaken to inform the revised SEA as appropriate.

Reason: In the interest of clarity and completeness.

- b) The Assembly considers that Appendix E of the SEA Environmental Report - 'Review of Regional and Local Level Plans and Programmes' is updated to include references to the thirty-one city and county development plans and that a review of same is undertaken to inform the revised SEA as appropriate.

Reason: In the interest of clarity and completeness.

- c) The Assembly considers that the SEA Environmental Report should address the use of existing transport modelling capabilities to address emissions impacts of spatial planning decisions and estimation of embodied carbon impacts of both spatial planning decisions and of construction technologies.

Reason: In the interest of clarity and completeness.

- d) The Assembly considers that the approach to the assessment of alternatives with +/- results for almost all boxes in the matrix demonstrates the lack of value in the SEA process carried out in terms of informing the decisions taken. To meet the requirements of an effective SEA process, the Assembly recommends that the analysis should estimate the carbon emissions impacts of the alternatives considered.

Reason: In the interest of clarity and completeness.

- e) The Assembly recommends that the SEA Environmental Report should explicitly consider compliance with environmental legal obligations, including the Climate Change and Low Carbon Development Act 2021.

Reason: In the interest of clarity and completeness.

- f) The Assembly considers that the approach to indicators and monitoring applied in the SEA Environmental Report is inadequate, as demonstrated by experience with NPF monitoring to date. The approach to monitoring set out in the current SEA Report will continue this trend if left unaddressed. The Assembly recommends that an additional NPO be prepared to develop an appropriate set of SEA environmental indicators to implement a coordinated approach to measuring and monitoring economic prosperity, environmental sustainability and climate action across all regions.

Reason: In the interest of clarity and completeness.

- g) The Assembly considers that the embodied carbon aspects of development should be better reflected in the revised NPF, and in the revised SEA Environmental Report.
Reason: In the interest of clarity and completeness.
- h) The Assembly considers that the issue of ‘managed retreat’ should be better reflected in the revised NPF, and in the revised SEA Environmental Report.
Reason: In the interest of clarity and completeness.
- i) It is not clear if the Draft First Revision has quantified or included measures to mitigate additional emissions of 6 MT per annum, resulting from the increased population projections. The Assembly considers that this should be included in the revised NPF.
Reason: To ensure consistency with the carbon budgets and the Climate Action Plan 2024.

General Considerations

14. a) The Assembly requests that the name of the organisation is corrected on pages 16, 27, 28, 150 and in Table 9.1 of the Draft First Revision to ‘Eastern and Midland Regional Assembly’ by the removal of the ‘s’ from ‘Midlands’, and that the word ‘area’ is deleted from after the organisation’s name on page 28 of the Draft First Revision.
Reason: To improve the accuracy of the NPF and to refer to the Assembly by its correct name.
- b) The ‘Old Rail Trail Greenway’ between Athlone and Mullingar has been included as a case study in the Draft First Revision. The Assembly recommends that this text is reviewed.
Reason: To provide a legible and well-described case study since the text in the body of the current case study is not legible in the Draft First Revision.
- c) The Assembly notes that CAP 2023 is referenced throughout the text of the Draft First Revision. The current Climate Action Plan is CAP 2024, with drafting of CAP 2025 at an advanced stage. The text of the first revision should be updated to reflect this.
Reason: To, as much as is possible, future-proof the revised NPF and ensure that all information is current at the time of publication.
- d) The Assembly notes that the All-Island Strategic Rail Review report has been finalised, meaning it does not need to be referred to as ‘draft’ in the revised NPF.
Reason: To ensure that all information is current at the time of publication.
- e) The Assembly recommends that the Draft First Revision is reviewed in its entirety to ensure consistency with the Planning and Development Bill 2023.
Reason: To ensure consistency between the revised NPF and the Planning and Development Bill 2023, and to ensure effective implementation of the NPF and the RSEs.
- f) The Assembly requests that regarding NPO 18 and NPO 19 which related to the identification and quantification of locations for strategic employment development, the Assembly notes that the term “*Regional and Local Authorities*” is used. The Assembly requests that this is changed to “*Regional Assemblies and Local Authorities*” which is more precise and prevents the possibility of confusion with other bodies and authorities which have a regional remit.
Reason: To ensure that all information is current at the time of publication.
- g) The Assembly notes the typographical error in the name of NSO 10 in Chapter 10. The word “*Qualify*” should be corrected to “*Quality*” in the revised NPF.
Reason: In the interest of clarity.

4.0 Conclusion

The Regional Assembly welcomes the Draft First Revision of the National Planning Framework and trusts that the recommendations as set out at Section 3.0 of this submission and the observations made throughout will be considered in the finalisation of the First Revision and the environmental assessment of same. It should be noted that the officials of the Regional Assembly are available to discuss the matters raised above and the Assembly welcomes further opportunities to engage in the statutory process of the making of the Draft First Revision of the National Planning Framework.

Regards,



Clare Bannon
A/Director
Eastern and Midland Regional Assembly
4th September 2024