



## **Submission of the Eastern and Midland Regional Assembly to the Public Consultation on Accelerating Infrastructure Delivery**

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## 1.0 Overall Context

The Eastern and Midland Regional Assembly (EMRA) notes the Consultation and the publication of the accompanying Public Consultation Paper on Infrastructure Delivery by the Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation and sets out hereunder observations and recommendations on behalf of the Assembly. This submission has been prepared by the executive and approved by the Cathaoirleach of the Eastern and Midland Regional Assembly on the 3<sup>rd</sup> July 2025.

The purpose of the consultation is to invite feedback from stakeholders, industry experts, and the wider public on infrastructure delivery, with the aim of identifying key barriers to delivery and ultimately improving outcomes. The Assembly acknowledges the Government's commitment to identifying and addressing the barriers to infrastructure delivery and notes that this work takes place within the wider framework of Project Ireland 2040, comprising the National Planning Framework (NPF) and the National Development Plan (NDP) 2021–2030.

The Assembly is participating in this consultation to ensure that infrastructure delivery reforms support the implementation of the Regional Spatial and Economic Strategy (RSES), align with the National Planning Framework (NPF) and National Development Plan (NDP), and address the governance, coordination, and capacity challenges that affect timely, legally compliant, and regionally balanced infrastructure delivery. This reflects the Assembly's statutory role in regional planning, coordination, and monitoring, and its commitment to supporting Project Ireland 2040 and Ireland's EU and climate obligations. In so doing, the submission sets out a **number of recommendations** that the Regional Assembly consider are required to accelerate infrastructure delivery as detailed in the Consultation Paper. These recommendations are contained in section 3.0 of this submission.

## Role and Function of the Regional Assembly

The Eastern and Midland Regional Assembly (EMRA) is part of the regional tier of governance in Ireland. The role and function of the Regional Assembly are currently provided for in the Planning and

Development Act 2000, as amended. It should be noted that this legislation has been superseded by the Planning and Development Act 2024, which was signed into law on 17th October 2024. However, the provisions of the Planning and Development Act 2024 relevant to the Regional Assembly have not commenced to date, and they will commence on a staged basis in the coming months. Until then, the provisions of the Planning and Development Act 2000, as amended, remain in force. Notwithstanding, the Assembly notes the reaffirmation of the statutory role of Regional Assemblies under the Planning and Development Act 2024 and the recognition of Regional Spatial and Economic Strategies (RSESs) as key implementation mechanisms for the NPF.

EMRA (the Assembly), as the regional assembly for the Eastern and Midland Region (EMR), has statutory responsibility for spatial and economic strategy under the RSES, including the Dublin Metropolitan Area Strategic Plan (MASP). 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 Act 2024, 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, with the support of the Department for Housing, Local Government and Heritage. All of these functions support the delivery of infrastructure in the Eastern and Midland Region in line with Project Ireland 2040 at the regional level.

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

The current Regional Spatial and Economic Strategy (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 opportunities 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 RSOs and key principles are closely aligned with and supportive of the National Strategic Outcomes of the National Planning Framework.

A primary statutory objective of the RSES is to support the implementation of the National Planning Framework (NPF), aligning with the investment priorities of the National Development Plan (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.

It should be noted that under Section 30 (1) of the Planning and Development Act 2024, a Regional Assembly is required, not later than 6 months after the publication of a revised or new NPF, to commence a review of the RSES for its region. As both Houses of the Oireachtas approved a revised NPF in April 2025, the Assembly must commence a review of its RSES by October 2025, if Section 30 (1) of the Act is enacted by then.

## 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.

Furthermore, the cross-boundary Dublin-Belfast Economic Corridor (DBEC) is a significant growth enabler within the Region, connecting Dundalk, Newry, and Belfast, as well as the sea and airports at Dublin and Belfast. This is complemented by an Eastern Corridor extending south to Rosslare Europort. The DBEC represents an important economic and transport link and a key enabler for spatial and economic regional growth.

The revised National Planning Framework 2025 reflects changes to government policy that have occurred since its initial publication, including climate transition, regional development, demographics, digitalisation, and investment and prioritisation. In doing so, it reflects the Spatial Strategy and the settlement hierarchy presented, allowing for managed and sustainable growth that enables each place to fulfil its ambition and potential. In turn, the Assembly considers that infrastructure delivery should be closely aligned with this settlement hierarchy to ensure that all public capital investment is directed most effectively to achieve the ambitious objectives of Project Ireland 2040.

## 2.0 Submission

The Assembly plays a central role in guiding the delivery of Project Ireland 2040 objectives across the most populous and economically significant region in the State. In responding to the questions in the consultation paper, this submission sets out **evidence-based recommendations to support accelerated infrastructure delivery** in Ireland by **strengthening regional governance, improving decision-making quality, enhancing spatial alignment between the RSES and NPF, and ensuring legal, environmental, and climate compliance in line with national and EU policy**, under the following headings:

- 2.1 Delivery of Core Economic Infrastructure in Ireland
- 2.2 Barriers to the Delivery of Transport, Electricity and Water Networks in Ireland
- 2.3 How Identified Barriers Affect the Delivery of Core Economic Infrastructure Networks
- 2.4 How Identified Barriers Have Affected the Eastern and Midland Regional Assembly
- 2.5 Three High-Level Solutions to Remove Identified Barriers
- 2.6 Additional Feedback from the Eastern and Midland Regional Assembly to Support the Delivery of Critical Infrastructure in Ireland
- 3.0 Recommendations
- 4.0 Conclusions

Further to the series of questions set out in the consultation paper, the identified barriers and their impacts as outlined in Sections 2.1 to 2.4 are addressed through the matched solutions in Section 2.5 and the consolidated series of recommendations included in Section 3.0. With the appropriate mandate and resources, the Regional Assembly is well placed to deliver such reforms to support more timely, sustainable, and regionally balanced infrastructure delivery.

## 2.1 Delivery of Core Economic Infrastructure in Ireland

The consultation paper highlights the scale of the challenge Ireland faces in delivering core economic infrastructure on time and within budget, while meeting climate and environmental goals and ensuring spatial alignment with the NPF. The Assembly acknowledges the progress made in increasing capital investment in core infrastructure under the NDP and highlights the critical role of the RSES as an implementation mechanism for Project Ireland 2040. The EMRA RSES integrates both spatial and economic planning, making it the primary statutory mechanism for delivering Project Ireland 2040 objectives at regional level, with a specific focus on integrating land use and infrastructure planning to deliver sustainable, balanced, and climate-resilient growth.

Notwithstanding, the 2025 European Commission Country Report<sup>1</sup> for Ireland (Country Report) and the 2024 OECD Regional Development Paper '*Towards Balanced Regional Attractiveness in Ireland: Enhancing the Delivery of the National Planning Framework*' (OECD Paper) both identify territorial governance weaknesses as major barriers to balanced regional development and effective infrastructure delivery. As identified in the OECD Paper and the NPF Expert Group Review (2023), Ireland continues to operate within an overly centralised and fragmented governance structure, with insufficient regional input into infrastructure planning, sequencing, and delivery, with the effective delivery of the Dublin MASP hindered by the lack of a statutory implementation mechanism.

Furthermore, the Country Report for Ireland and OECD Paper highlight the persistent challenge of intra-regional economic and infrastructural disparities, particularly between Dublin, its surrounding counties, and more peripheral areas within the Eastern and Midland Region. For completeness, it is also important to acknowledge that the OECD Report highlights that Dublin faces challenges in terms of its labour market, social cohesion, environmental preservation, and natural capital, and that addressing these issues is crucial for enhancing community building, providing more natural amenities, and improving employment.

With specific reference to 'economic infrastructure', alignment between the RSES, Regional Enterprise Plans (REPs) and the National Smart Specialisation Strategy (2022–2027) is essential to ensuring that infrastructure investments underpin sustainable economic development. The Assembly also notes the designation of Ireland's three regions, including the EMR, as Regional Innovation Valleys (RIVs) under the European Commission's Regional Innovation framework, recognising the region's potential for innovation-led growth supported by infrastructure investment.

From the Assembly's perspective, action is required to address the following issues:

- **Secure alignment between spatial and economic planning and infrastructure sequencing**, to deliver compact growth and place-based development objectives of the NPF and accelerate housing and enterprise activation.

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<sup>1</sup>European Commission Country Reports are part of the annual European Semester process. They are intended to assess the economic, social, and environmental challenges facing each EU member state, and to guide the formulation of Country-Specific Recommendations (CSRs).

- **Provide for statutory mechanisms for regional input** into infrastructure investment planning, sequencing and decision-making.
- **Secure alignment between infrastructure delivery and settlement hierarchy**, as defined in the RSES.
- **Enhance certainty and transparency around infrastructure timelines and funding**, especially for enabling infrastructure that supports housing delivery.
- **Address fragmented governance, an over-reliance on centralised decision-making and ensure that spatial and economic policy objectives are aligned through** regional involvement in infrastructure investment programming and prioritisation.
- **Enhance cooperation and coordination among the various State bodies** involved in infrastructure design and delivery.
- **Enhance procedural safeguards** to achieve sustainable and legally sound outcomes.

The Assembly considers that without clearer mechanisms to align national investment decision-making with the RSES, opportunities for integrated, place-based infrastructure delivery are being missed. It highlights the need to embed early-stage, spatially aligned infrastructure planning across all sectors, involving all stakeholders.

One of the key challenges identified in recent discussions is the need for enhanced cooperation and coordination among the various State bodies involved in infrastructure design and delivery. The Assembly recognises this as a critical issue. The Assembly wishes to emphasise its current role in supporting such coordination, as provided for under the Planning and Development Act 2000 (as amended) (e.g. Section 25A of the 2000 Act). However, the Assembly notes with concern that the new Planning and Development Act (2024) introduces several provisions (e.g., Section 35(3) of the 2024 Act) that remove the essential role of the Assembly in helping to coordinate the activities of State bodies in line with the democratically made RSES. The Assembly respectfully urges that careful consideration be given to this and that the current provisions of the 2000 Act remain in place.

Furthermore, the Assembly emphasises the importance of recognising the value of spatial planning, particularly when it is undertaken with the full and active involvement of relevant State agencies. When effectively implemented, spatial planning can provide greater certainty for infrastructure providers—whether public, private, or community-based—and thereby accelerate the delivery of critical infrastructure and maximise the investment return of critical infrastructure spending. While the benefits of this approach have long been evident in terrestrial planning, the recent reform of offshore renewable energy development offers a particularly illustrative example. The transition from a developer-led model to a plan-led framework has clearly demonstrated how strategic planning can improve clarity, coordination, and outcomes.

The Assembly emphasises the importance of conducting effective environmental assessments and making informed, evidence-based decisions regarding infrastructure proposals. In this context, the Assembly emphasises the importance of thoroughly considering reasonable alternatives and ensuring complete legal compliance throughout the process. Mechanisms such as successful appeals or judicial reviews should not be viewed merely as delays. Instead, they are essential components of a robust planning system that help uphold public trust, environmental and democratic safeguards and ensure high-quality outcomes. The Assembly considers that any proposed changes that could affect these safeguards should be based on a thorough, evidence-based assessment of the problems being addressed and the potential impacts of the changes.

The Assembly supports improved funding for both An Coimisiún Pleanála and the institutions involved in judicial review, including the Courts Service and the Chief State Solicitor's Office. Additionally, the

Assembly recognises the need for procedural reforms aimed at reducing the cost and duration of litigation, while ensuring that access to justice and the integrity of the planning system are maintained.

## 2.2 Barriers to the Delivery of Transport, Electricity and Water Networks in Ireland

The Consultation Paper identifies several high-level barriers to infrastructure delivery in Ireland, including planning and consent processes, regulatory capacity, and skills shortages. EMRA supports this analysis but wishes to expand on these points with evidence from the RSES, the OECD Paper, the 2023 NPF Expert Group Review, and the 2025 Country Report, which identify systemic barriers to timely infrastructure delivery, as well as the Assembly's own experience in coordinating regional infrastructure planning and monitoring.

Building on Section 2.1 of this submission, the Assembly considers that common identified barriers which affect infrastructure delivery in Ireland include:

**Fragmented governance, decision-making, and delivery structures:** In many sectors, there is no single accountable body for end-to-end infrastructure delivery. Furthermore, a multiplicity of regional public bodies, some with related or overlapping roles and varying administrative geographies, can act to obscure the mandates of Regional Assemblies. This dynamic can lead to coordination failures due to limited regional involvement in infrastructure delivery. Decision-making on capital investment is highly centralised, limiting regional input into project pipeline development. Indeed, Ireland's regional governance is characterised by weak autonomy and a lack of devolved funding powers, unlike competing EU regions that benefit from multi-annual funding programmes at sub-national levels. The lack of formal regional coordination structures has led to misaligned project selection, poor cross-agency sequencing, and inefficient integration of land use and infrastructure. The OECD (2024) explicitly notes the need for stronger multi-level governance and regional competences to improve infrastructure delivery. In turn, the Assembly considers that any implementation review should include a comprehensive examination of the local government process, encompassing empowerment at both local and regional levels.

**Lack of statutory support for regional coordination:** While the revised NPF identifies the Regional Assemblies' leadership role in coordinating regional planning and policy delivery, gaps remain in execution and resourcing. Furthermore, despite their strategic significance, MASP remain without formal legislative backing or dedicated delivery frameworks, with current governance relying on informal structures that lack a legal mandate. The Assembly considers that this lack of legislative support for MASP implementation undermines cross-agency coordination at the metropolitan level, resulting in infrastructure funding streams not being spatially prioritised in alignment with the NPF or RSES, thereby exacerbating spatial inequities.

**Weak inter-agency and cross-governmental coordination:** Decision-making on infrastructure remains highly centralised within Government Departments and agencies, with limited statutory roles for Regional Assemblies in infrastructure coordination or prioritisation. Furthermore, infrastructure delivery often proceeds through single-sector pipelines (e.g., transport, water) without adequate regional spatial coordination, and current capital project appraisals do not formally require RSES consistency checks, weakening spatial targeting and risking misaligned investment.

**Funding uncertainty and underinvestment in enabling infrastructure:** The Assembly notes the absence of predictable, multi-annual funding streams for critical enabling infrastructure to unlock

housing and economic development lands. Local authorities often struggle to fund the upfront infrastructure needed for housing and economic development, and current capital allocation mechanisms do not sufficiently account for spatial targeting as outlined in the RSES and NPF. The Assembly considers that reform should enhance regional performance by integrating planning with the resourcing management that affects the regions.

**Skills shortages:** There are substantial capacity gaps in project management, planning, and environmental consenting expertise across both public and private sectors. Local authorities, Regional Assemblies and An Coimisiún Pleanála face capacity challenges in planning, project management, and environmental assessment, as identified in the Ministerial Action Plan on Planning Resources (2024).

**Lengthy and complex consenting processes:** The Assembly strongly supports the need for robust, evidence-based decision-making, including effective environmental assessment and legal compliance, to prevent avoidable delays at later stages. Regulatory and environmental assessments, although necessary, are often conducted sequentially rather than in parallel, resulting in procedural delays and uncertainty. OECD best practice suggests consolidating and frontloading assessments while maintaining legal integrity. The Assembly emphasises that any reform of judicial review processes must be evidence-based, maintain compliance with EU law and the Aarhus Convention, focus on reducing litigation, and not undermine access to justice or environmental safeguards.

The Assembly further identifies the following barriers, which are specific to transport, electricity and water networks in Ireland:

### **Transport Networks**

The 2025 European Commission Country Report and the Climate Change Advisory Council's *Transport Sectoral Review: Annual Review 2025* both highlight critical gaps in delivery, especially in metropolitan rail, regional public transport, and walking and cycling infrastructure. These gaps are now contributing to rising transport emissions and missed climate targets.

The revised National Planning Framework and Planning and Development Act 2024 underscore the role of Regional Assemblies in integrating transport with land use and infrastructure sequencing. EMRA is therefore uniquely positioned to guide investment in a manner that aligns with the MASP and RSES objectives. Key barriers include:

**Fragmented Governance and Delivery Structures:** Multiple agencies (NTA, TII, local authorities) hold overlapping and sometimes unclear responsibilities for delivery, which acts to limit integrated decision-making.

**Weak Integration of Land Use and Transport Planning:** The RSES Guiding Principles for Land Use and Transport Integration (Section 8.3) require infrastructure delivery to support compact growth and active travel; however, this is not systematically embedded in project pipelines, which would also align with the revised NPF.

### **Electricity Networks**

The 2025 European Commission Country Report underlines Ireland's ongoing energy system constraints, including grid congestion, lengthy connection timelines, and delays in obtaining planning consents, which risk undermining progress on both climate and housing targets. In the Eastern and

Midland Region, these issues are particularly acute. Grid infrastructure limitations are now a binding constraint on housing delivery in several high-growth towns and regional centres.

The revised National Planning Framework 2025 and the Planning and Development Act 2024 now explicitly assign a key role to the Regional Assemblies in the spatial coordination of Ireland's energy transition. This includes, for the first time, a formal function in setting indicative regional targets for onshore wind and solar PV deployment—ensuring that national climate and energy goals are delivered in a spatially balanced, environmentally sustainable, and community-embedded manner.

Key barriers include:

**Grid Capacity Constraints:** Ireland's electricity grid lacks the capacity to connect planned renewable energy projects, which threatens the achievement of national targets under the Climate Action Plan, the National Energy and Climate Plan, and the Carbon Budgets.

**Absence of Regional Coordination on Grid Upgrades:** Under the Planning and Development Act 2024, RSESs are required to include a regional renewable energy strategy; however, grid planning by national agencies is not yet integrated with RSES spatial priorities.

**Delays in Consenting Processes:** Projects often face delays due to legal challenges rooted in inadequate environmental assessment and alternatives analysis.

## Water Networks

The 2025 European Commission Country Report highlights deficiencies in wastewater treatment compliance, the slow pace of upgrades in urban centres, and the challenge of sequencing development with infrastructure availability. These issues delay housing delivery, particularly in designated growth centres and regeneration areas, and increase Ireland's risk of environmental non-compliance under EU Directives such as the Urban Wastewater Treatment Directive and the Water Framework Directive.

The Planning and Development Act 2024 and revised National Planning Framework 2025 now require greater alignment between land use planning and utility investment. As such, Regional Assemblies are well-positioned to play a coordinating role in ensuring that Uisce Éireann's Capital Investment Plan is matched with zoning, housing activation, and environmental objectives.

Key barriers include:

**Deficits in Water and Wastewater Infrastructure:** Housing land activation, compact growth, and regional economic development are being delayed by a lack of strategic investment in water services.

**Sequential and Protracted Decision Processes:** The absence of parallel processing for consents, funding approval, and connection agreements extends project timelines, risking non-delivery of NPF and RSES growth targets.

**Limited Regional Input to Infrastructure Planning:** Regional Assemblies currently lack statutory mechanisms to coordinate with Uisce Éireann on infrastructure programming, despite having statutory monitoring functions for RSES.

## 2.3 How Identified Barriers Affect the Delivery of Core Economic Infrastructure Networks

The various barriers outlined above are materially affecting infrastructure delivery across the EMR, with knock-on effects for housing, economic development, and climate action and have direct and measurable impacts on project delivery timelines, legal compliance, regional population targets, and environmental outcomes. As the OECD notes, the lack of regional competence in infrastructure governance creates coordination challenges in delivering key investments in areas like transport, housing, education, and energy. Furthermore, the 2025 European Commission Country Report notes intra-regional disparities in infrastructure provision across the Eastern and Midland Region. The combined barriers across transport, electricity, and water sectors are impacting Ireland's ability to meet NPF, NDP, and RSES targets, resulting in:

- **Delays in housing delivery and compact growth**, contrary to NPF and Housing for All targets. The OECD (2024) highlights that current governance gaps affect Ireland's ability to achieve balanced territorial development, undermining both the NPF and the EU Territorial Agenda 2030 goals.
- **Undermining of MASP and RSES Implementation** due to a lack of statutory implementation mechanisms, leading to risks that spatial growth patterns will diverge from national policy.
- **Failure to meet climate targets** by impeding progress on renewable energy, sustainable mobility, and decarbonisation. Fragmented governance and a lack of integration across planning tiers impede delivery of transport decarbonisation projects, critical water services infrastructure, and renewable energy deployment.
- **Increased project costs and persistent intra-regional disparities**. Increased project costs and underinvestment in the Midlands, combined with infrastructure pressures in the Dublin and Eastern Regions, have resulted in widening intra-regional inequalities and delays to critical infrastructure requirements in the Dublin and wider metropolitan area. As such, investment has not fully aligned to address the needs of strategic growth locations as identified in the RSES. As noted in the 2025 European Country Report, persistent under-investment outside the Dublin Metropolitan Area continues to widen disparities within the EMR, thereby reinforcing economic and spatial imbalances.
- **Judicial review and appeals**: Any proposed changes that could affect these safeguards should be based on a thorough, evidence-based assessment of the problems being addressed and the potential impacts of the changes.

The Assembly further identifies the following impacts, which are specific to transport, electricity and water networks in Ireland:

### Transport Impacts

Delays in transport network delivery (particularly active travel and public transport) are impeding the achievement of NPF, as well as RSES objectives for compact growth and sustainable mobility. Furthermore, as noted in the OECD Paper (2024), fragmented decision-making and visible project delays weaken public and investor confidence in Ireland's infrastructure delivery system.

### Electricity Impacts

Grid bottlenecks are preventing timely connection of new renewable energy projects, thereby risking Ireland's ability to meet its legally binding carbon budgets. Furthermore, until the publication of Regional Renewable Energy Strategies, a high risk of spatial mismatch between grid investment planning, generation, and grid capacity remains.

## Water Impacts

Inadequate water and wastewater infrastructure is a major factor limiting the activation of zoned lands in key RSES growth settlements (Regional Growth Centres and Key Towns). Furthermore, delays in upgrading wastewater infrastructure carry environmental compliance risks, undermining Water Framework Directive targets and EU law compliance.

## 2.4 How Identified Barriers Have Affected the Eastern and Midland Regional Assembly

The barriers outlined above affect the ability of the Regional Assembly to fulfil its statutory functions, including RSES implementation and monitoring and MASP coordination.

### RSES and MASP Implementation

Without statutory implementation structures, EMRA's ability to coordinate and monitor NDP delivery or drive infrastructure sequencing and prioritisation at the regional level and for the Dublin Metropolitan Area remains constrained.

### Reduced Monitoring and Reporting Functions

Certain provisions of the Planning and Development Act 2024 risk limiting the Assembly's ability to monitor and report on State agency delivery of the RSES. The Assembly reiterates its call for a selective commencement approach to the Planning and Development Act 2024 to protect the existing strategic coordination functions of the Regional Assembly, which play a key spatial role across multiple service delivery areas.

### Capacity and Resource Constraints

Resource limitations, already highlighted in the Ministerial Action Plan on Planning Resources (2024), further hinder the Assembly's ability to engage effectively in infrastructure coordination at regional and metropolitan scale. The Assembly lacks adequate resources to support critical cross-sector coordination on infrastructure delivery, climate action, and renewables deployment. This affects the Assembly's ability to fulfil its statutory functions in RSES monitoring, MASP coordination, and infrastructure oversight.

### Limitations on Influencing Infrastructure Sequencing

Despite the Assembly's spatial planning remit, EMRA currently has no formal role in project appraisal processes for NDP-funded infrastructure projects, undermining the spatial coherence of investment. This also reduces the Assembly's capacity to manage and monitor the impacts of infrastructure on climate, biodiversity, and water objectives, thereby putting national compliance at risk.

## 2.5 Three High-Level Solutions to Remove Identified Barriers

Based on the content of the preceding sections of this submission, the Assembly proposes three interconnected solutions as follows:

### Solution 1: Statutory Strengthening of Regional Governance

OECD research (2024) identifies the absence of intermediary governance bodies as a key structural weakness in Ireland's spatial planning system. International best practice shows that devolved regional coordination improves infrastructure outcomes.

The Assembly recommends the following:

- As recommended in the NPF Expert Group Review and OECD Report 2024, establish statutory mechanisms for MASP delivery, providing Regional Assemblies with an explicit coordination mandate for infrastructure delivery across sectors.
- Establish a defined role for Regional Assemblies in NDP implementation monitoring, project prioritisation, and spatial alignment of investment decisions.
- Advance multi-level governance reforms, in line with OECD 2024 recommendations and directly address barriers linked to fragmented governance and spatial misalignment.
- To support the above, expand planning and governance capacity within the Regional Assemblies, building on the Ministerial Action Plan on Planning Resources.

### **Solution 2: Embed Spatial Alignment in Infrastructure Investment Decision-Making**

The 2025 European Commission Country Report and the OECD Paper 2024 emphasise the importance of spatial targeting of infrastructure investment to address regional imbalances. The Assembly recommends the following:

- Develop a 'Regional Infrastructure Pipeline', linked to RSES priorities (including alignment with the RSES Settlement Strategy) and integrated with NDP performance monitoring to enable infrastructure in line with settlement hierarchies, climate targets, and sustainability criteria, as set out in the NPF and RSES. It should be noted that in line with the requirements of the Planning and Development Act 2024, an RSES and a Metropolitan Area Strategic Plan shall include an indication of priorities for infrastructure of scale, including an order of priority, potential sources of funding, cross sectoral investment to deliver and the cooperation of public bodies.
- Formally embed RSES consistency checks as part of all NDP capital project appraisals and selection processes, ensuring alignment with national spatial and economic objectives.
- Having regard to the Coolglass judgement and relevant EU Directives, consider a mechanism that ensures capital projects demonstrate compliance with climate, biodiversity, and water quality obligations.
- Expand monitoring, reporting, and public communication tools, such as the NDP Tracker and Interactive Map, to provide more accessible, disaggregated, outcome-focused, and spatially targeted investment data and infrastructure progress data, thereby improving public understanding and trust.

### **Solution 3: Improve Decision-Making Quality and Maintain Legal and Environmental Safeguards**

As per EU law and Aarhus Convention obligations, evidence-based decision-making frameworks, public participation, environmental assessment, and access to justice are foundational pillars of lawful decision-making. The Assembly recommends the following:

- Require all infrastructure delivery agencies to adopt early, evidence-based decision-making frameworks, supported by thorough environmental assessment and analysis of reasonable alternatives, public consultation processes and legally compliant decision-making.
- Streamline judicial review processes while achieving compliance with EU environmental law and access to justice standards.
- Implement procedural reforms to reduce litigation timeframes while upholding the principles of the Aarhus Convention and EU environmental law. Implement procedural reforms that focus on improving process efficiency without undermining access to justice or environmental law compliance.

- Address planning system capacity constraints, as identified in the Ministerial Action Plan on Planning Resources, with targeted investment in regional assembly and local authority staffing. In addition, enhance resourcing of An Coimisiún Pleanála and the Courts Service.

## 2.6 Additional Feedback from the Eastern and Midland Regional Assembly to Support the Delivery of Critical Infrastructure in Ireland

### Role of the Regional Assemblies

The Assembly reaffirms its commitment to supporting the NPF, NDP, Climate Action Plan, and relevant EU and national strategies through its statutory functions as set out in the Planning and Development Act 2024 and the Local Government Reform Act 2014. To fully deliver on this mandate, targeted governance reform and enhanced resource allocation to Regional Assemblies are required to support new statutory responsibilities (e.g. renewable energy infrastructure planning). In line with the recommendations of the OECD Paper (2024) and the NPF Expert Group Review (2023), the Assembly recommends a stronger, statutorily backed role for Regional Assemblies in NDP oversight and infrastructure sequencing.

### Intra-Regional Disparities

The Assembly draws attention to intra-regional disparities within the Eastern and Midland Region. The Midlands Region requires targeted infrastructure investment to support Just Transition, connectivity, and economic diversification. The Dublin and Eastern Regions face infrastructure delivery pressures that risk undermining compact growth and climate targets. The Assembly recommends that reforms to accelerate infrastructure delivery should:

- Explicitly address intra-regional disparities within the EMR.
- Prioritise enabling infrastructure investment in both the Midlands and targeted growth areas in the Dublin and Eastern (Mid-East) Regions, in line with the RSES Settlement Strategy.
- Expand digital infrastructure investment, building on EMRA's work in regional digitalisation, smart specialisation, and co-working/remote working initiatives.
- Strengthen regional governance structures, including statutory support for MASP delivery, to enable coordinated infrastructure sequencing that reduces spatial inequalities.

This approach aligns with recommendations from the 2025 European Commission Country Report, the OECD (2024), and Ireland's commitments under the EU Cohesion Policy and Territorial Agenda 2030.

### Ensuring Infrastructure Prioritisation Reflects Wider Spatial and Policy Objectives

The Assembly wishes to emphasise that population size alone is a crude and insufficient metric for infrastructure prioritisation. While population is a legitimate factor in investment decision-making, relying on it as the dominant or sole determinant risks reinforcing existing spatial imbalances and undermining the principles of compact growth.

EU policy positions, notably the EU Territorial Agenda 2030 and the 8th Cohesion Report, both stress the importance of "place-based, needs-driven infrastructure investment" that addresses spatial disparities, climate vulnerabilities, and socio-economic inequalities. From an Irish policy perspective, the NPF, the NDP, and the Climate Action Plan 2024 are all consistent with the application of more sophisticated investment decision-making frameworks that reflect spatial planning priorities, climate resilience, and social inclusion goals. The Assembly therefore recommends that future infrastructure prioritisation frameworks under the NDP adopt a multi-criteria, spatially aware investment model, incorporating indicators such as spatial equity and effective regional development metrics; infrastructure deficit and service accessibility assessments including current infrastructure capacity and quality; economic development plans; climate risk and resilience factors; social inclusion and economic vulnerability indicators, and; consistency with the RSES Settlement Hierarchy and NPF objectives.

As part of this multi-criteria approach to infrastructure investment, and in addition to the specific needs and targeted interventions required for the Midlands and Mid-East regions, consideration should also be given to the role of Dublin as Ireland's Capital City region. This includes recognising its multi-functional role as a key population centre, political hub hosting parliament, embassies and government offices, an economic engine hosting many corporate HQs, a cultural flagship, that it is home to national universities and hospitals with specialists services that serve the entire Country, that it hosts national transport nodes such Dublin Port and Airport, and is a national symbol of Ireland's image. In this regard, infrastructure provision must support not only residents but also commuters, tourists, foreign diplomats and businesses.

Such an approach would ensure that infrastructure investment better supports Ireland's national and regional development goals, meets EU Cohesion Policy standards, and delivers on the Territorial Just Transition, climate action, and compact growth ambitions embedded in both national and EU policy.

### **Evidence-Based Reform**

A clear, evidence-based rationale should support any proposed legislative or procedural changes aimed at accelerating the delivery of infrastructure. Reform measures should address root causes of delay—such as decision quality, coordination failures, and governance gaps—rather than focusing exclusively on statutory timeframes or appeals processes.

### **Environmental and Climate Compliance**

The Assembly highlights that Ireland's climate, biodiversity, and water objectives are now embedded in both domestic and EU law, requiring full compliance in infrastructure planning and delivery. Infrastructure delivery must fully comply with Ireland's obligations under the Climate Action and Low Carbon Development Act, the Water Framework Directive, the Habitats Directive, and the EU Nature Restoration Law. The Assembly draws attention to the Coolglass judgment, in which the High Court emphasised the need for fundamental changes in decision-making to meet climate obligations. In this judgement, Humphreys J. observed that "an immediate end to business as usual is a precondition for planetary survival." Therefore, the Assembly considers that:

- Climate and environmental screening should be embedded into all major infrastructure projects, using carbon impact, water resource constraints, nature-based solutions, and nature restoration as criteria for project prioritisation in line with the revised NPF.
- A targeted evaluation of strategic road projects should be undertaken to prioritise capital expenditure, consistent with national spatial policy that supports compact growth, addresses climate risk, and emphasises critical regional connectivity deficits, as well as road safety, public transport, and active travel.
- Infrastructure acceleration must take place while ensuring environmental compliance and legal certainty.

### 3.0 Recommendations

The following is a consolidated list of **recommendations** from the Regional Assembly that should be taken into consideration by the Accelerating Infrastructure Taskforce. **These recommendations should be read in conjunction with the recommendations of the Eastern and Midland Regional Assembly in its [submission to the NDP Review consultation](#).**

#### 1. Strengthen Regional Governance and Statutory Roles

- Implement statutory mechanisms for MASP delivery that grant Regional Assemblies explicit coordination and oversight roles across infrastructure sectors, including transport, electricity, and water networks, to improve multi-level governance and reduce fragmented decision-making.
- Empower Regional Assemblies with formal roles in monitoring and reporting on NDP implementation, project prioritisation, and infrastructure sequencing to ensure spatial and policy alignment with the RSES and MASP.
- Protect Regional Assembly coordination functions by reviewing provisions of the Planning and Development Act 2024 (e.g. Section 35(3)) which remove the critical role of the Assembly in helping to coordinate the activities of State bodies in line with the democratically made RSES. The Assembly respectfully urges that careful consideration be given to this matter and that the current provisions of the 2000 Act remain in place.
- Allocate additional and sustained funding and staffing to Regional Assemblies, local authorities, An Coimisiún Pleanála, and the Courts Service to address capacity constraints and enable effective engagement in infrastructure coordination, decision-making, and appeals processes.

#### 2. Embed Spatial Alignment and Address Intra-Regional Disparities

- Create infrastructure pipelines linked to RSES priorities and settlement hierarchy, integrating these with NDP monitoring to guide investment sequencing that supports effective regional development and compact growth.
- Require all capital project appraisals and selections under the NDP to include mandatory RSES alignment assessments to ensure projects support national spatial and economic policy objectives.
- Explicitly address infrastructure disparities within the Eastern and Midland Region by targeting investment to the Midlands for Just Transition and economic diversification, while managing

infrastructure pressures in Dublin and Eastern (Mid-East) Regions in line with RSES and NPF objectives.

### **3. Improve Decision-Making Quality and Legal Compliance**

- a) Require infrastructure agencies to implement robust early-stage decision-making processes based on comprehensive environmental assessments, public consultation, and evaluation of reasonable alternatives, thereby improving decision quality and reducing litigation risk.
- b) While streamlining judicial review procedures to improve efficiency, safeguards required by EU environmental law, the Aarhus Convention, and access to justice principles must be fully implemented.
- c) Focus reforms on reducing timeframes and increasing efficiency in judicial review and planning appeals without compromising environmental law compliance or public participation rights.

### **4. Ensure Climate, Biodiversity, and Water Compliance in Infrastructure**

- a) As we work towards nature-positive, climate-resilient, and socially inclusive infrastructure, climate and environmental screening should be embedded in all major infrastructure projects, using carbon impact, water resource constraints, nature-based solutions, and nature restoration as criteria for project prioritisation in line with the revised NPF
- b) Targeted evaluation of strategic road projects should be undertaken to prioritise capital expenditure, consistent with national spatial policy that supports compact growth and addresses climate risk, critical regional connectivity deficits, and emphasises road safety, public transport, and active travel.

### **5. Adopt a Multi-Criteria, Spatially-Aware Infrastructure Prioritisation Framework**

- a) The Assembly recommends that future infrastructure prioritisation frameworks and spending under the NDP goes beyond population size and adopts a multi-criteria, spatially aware investment model, incorporating indicators such as spatial equity and effective regional development metrics; infrastructure deficit and service accessibility assessments including current infrastructure capacity and quality; economic development plans; climate risk and resilience factors; social inclusion and economic vulnerability indicators, and; consistency with the RSES Settlement Hierarchy and NPF objectives.
- b) Investment decision-making frameworks should integrate spatial equity, climate resilience, social inclusion, and economic vulnerability indicators, in line with the EU Territorial Agenda 2030, the 8th Cohesion Report, and Ireland's Climate Action Plan 2024.
- c) Infrastructure planning must recognise Dublin's unique role as Ireland's capital and a national and international hub for government, transport, education, healthcare, business, culture, and tourism, with infrastructure serving both residents and the wider country.

- d) Prioritisation processes should address intra-regional disparities within the EMR, supporting enhanced regional development and targeted infrastructure investment for growth areas across the region.

## **6. Enhance Transparency, Monitoring, and Public Engagement**

- a) Improve and expand publicly accessible infrastructure progress monitoring platforms such as the NDP Tracker and Interactive Map with spatially disaggregated, outcome-focused, and real-time data as a community accountability mechanism.
- b) Embed reporting on infrastructure delivery impacts, intra-regional inequalities, and compliance with climate and environmental targets into statutory monitoring and public communication functions.

## **7. Foster Cross-Sectoral Coordination and Integration**

- a) Ensure integrated planning and delivery mechanisms across transport, electricity, and water sectors to remove bottlenecks, optimise investment sequencing, and achieve national and regional climate and spatial planning objectives.
- b) Require all infrastructure agencies to consistently embed climate action, biodiversity protection, and water quality compliance in project design, approval, and implementation.

## **4.0 Conclusion**

The Regional Assembly welcomes the Consultation on Accelerating Infrastructure and trusts that the recommendations set out in Section 3.0 of this submission, along with the supporting observations made throughout, will contribute to the development of a set of high-impact reforms and policy actions for consideration by Government. The Assembly considers that with the appropriate mandate and resources, the Regional Assembly is well placed to deliver such reforms to support more timely, sustainable, and regionally balanced infrastructure delivery. It should be noted that officials from the Regional Assembly are available to discuss the matters raised above, and the Assembly welcomes further opportunities to engage with the Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation and the Accelerating Infrastructure Taskforce.

Regards,



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Clare Bannon  
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Eastern and Midland Regional Assembly  
4<sup>th</sup> July 2025