



Proposed National Planning Excellence Framework (NPEF)

The stakeholder consultation on the proposed National Planning Excellence Framework (NPEF) by the Department of Housing, Local Government and Heritage (DHLGH) was launched in May 2026. This will inform the preparation of the draft NPEF, which will be published for public consultation. The aim of the NPEF is to drive best practice and performance across all planning authorities, assessing excellence, consistency and quality in both existing and future planning.

The Assembly welcomes the opportunity to consult and sets out hereunder responses and observations on behalf of the Assembly. This submission has been prepared by the executive and approved by the Cathaoirleach on behalf of the Assembly.

1.0 Overall Context

The Eastern and Midland Regional Assembly (EMRA) is part of the regional tier of governance in Ireland. It is primarily focused on driving regional development through the formulation, adoption and implementation of the Regional, Spatial and Economic Strategy (RSES), oversight and coordination of City and County Development Plans and Local Economic and Community Plans, management of EU Operational Programmes, EU project participation, and the implementation of national economic policy. As a strategic policy body, EMRA also participates in the consultation processes of other relevant strategic plans and policies.

The role and function of the Regional Assembly, including the scope of the RSES 2019-2031, was provided for in the Planning and Development (P&D) Act 2000, as amended, which included support for and alignment with the economic policies and objectives of the Government. However, this legislation has been superseded by the Planning and Development (P&D) Act 2024, as amended, which was signed into law on 17th October 2024. The provisions of the P&D Act 2024, as amended, relevant to the Regional Assemblies commenced on 2nd October 2025. The P&D Act 2024, as amended, expands the scope of the RSES and the functions of the Regional Assembly. The Regional Assembly is further mindful of its obligations, as a 'relevant body', as prescribed under the Climate Action and Low Carbon Development Act 2015, as amended, to perform its functions in a manner consistent with the need to achieve Ireland's national climate objective.

1.1 Regional Spatial and Economic Strategy (RSES)

The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region was made by the Elected Members of the Assembly in June 2019, and it 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 opportunities and the wellbeing of people

and places in the Region, from urban to rural, with access to quality housing, travel and employment opportunities for all.

A primary statutory objective of the RSES is to support the implementation of the National Planning Framework (NPF), achieve alignment of investment priorities with those of the National Development Plan (NDP) and the National Marine Planning Framework (NMPF), and thus Project Ireland 2040, by coupling new development with the requisite investment in services and infrastructure. In doing so, the RSES supports the spatial, economic and climate policies and objectives of the Government by providing a long-term strategic planning and economic framework for the Eastern and Midland Region. The RSES also sets the context for local authorities within the Region to develop their City and County Development Plans (CDPs), and Local Economic and Community Plans (LECPs) in a manner that will ensure alignment between national, regional and local plans.

1.2 Review of the Regional Spatial and Economic Strategy (RSES)

In accordance with Part 3 of the P&D Act 2024, as amended, the Regional Assembly has commenced a review of the RSES for the Eastern and Midland Region, which will build on the progress made under the first RSES. The DHLGH will be aware that the pre-draft public consultation of the RSES review ended on 22nd of May 2026. The Assembly is in the process of drafting the Director's Report and engaging further with the constituent local authorities, relevant key stakeholders, Strategic Planning Area (SPA) Committees and other relevant stakeholders to prepare the Draft RSES.

The Act requires that the new RSES 'shall be materially consistent' with the Project Ireland 2040 including the NPF 2025, NMPF 2021, NDP 2025, and other national policies and measures.

1.3 Context for Submission

Under the P&D Act 2024, the Regional Assembly has no statutory obligation to prepare a submission in relation to the proposed National Planning Excellence Framework (NPEF). However, having regard to the objectives of the NPEF in "improving performance within the public planning system and building a platform for continuous oversight of performance" the Assembly considers that its content is of national and regional relevance and that a submission is warranted. In this regard, it is noted that Regional Assemblies form part of the identified key stakeholders to inform the preparation of the NPEF.

2.0 Submission

The DHLGH prepared a Stakeholder Engagement Performance Attributes Thematic Discussion Paper, and an accompanying feedback form as part of this stakeholder consultation. The Assembly welcomes the extensive preparatory work by the DHLGH in engaging with several stakeholders to identify the following key attributes of a high-performing planning system:

- A Sustainable Plan-Led System
- Effective and Timely Decision Making
- Strategic Resourcing & Organisational Culture
- Citizen Centred Service
- Transparency
- Digital Performance and Innovation.

The Assembly notes that the above-mentioned key attributes will be central to the development of the NPEF and the intention of the current consultation process is to obtain feedback from stakeholders with regard to “best practice, proposed improvements, identification of appropriate Key Performance Indicators (KPIs), and the potential outcomes relating to the enhancement of these attributes within the planning system”. The stakeholder feedback form includes a list of prompt questions under the key attributes. This submission provides feedback on the attributes that are relevant to the work of the Assembly and regional planning, and the responses are guided by these prompt questions.

2.1 Sustainable, Plan-Led System

A successful, sustainable, plan-led system should encompass a planning system that supports the co-production of frameworks, policies and plans, aligned with investment decisions, and that allows for their effective implementation, coordination and delivery across all tiers of government. In this respect, it should have a statutory mechanism for coordination and collaboration among well-resourced tiers of government, infrastructure and utility providers, and other relevant government departments and their agencies, thus extending beyond the presence of hierarchical and aligned statutory national, regional and local government frameworks, policies and plans.

At the regional level, the Assembly is in a unique position as it bridges the gap between national and local policy with the role of translating national planning and economic policy to the regional level and ensuring implementation at the local level is aligned with regional and thus national priorities. There is, therefore, an opportunity for both the RSES and its integrated Metropolitan Area Spatial Plan (MASP) to function as delivery tools with their own revenue source(s) and investment framework supported by relevant government departments, and infrastructure and utility providers to support place-based investment needs and the RSES and MASP priorities.

The OECD 2023 report [‘Towards Balanced Regional Attractiveness in Ireland’](#) includes a number of recommendations that support this and are applicable in delivering a successful, sustainable, plan-led system. These recommendations include strong multi-level governance; the establishment of formal implementation structures to deliver the objectives of the RSES and MASP; and multi-annual funding for Regional Assemblies.

Firstly, with regard to multi-level governance, the leadership role of the Assembly as a cross-sectoral integrator should be enhanced and highlighted by the NPEF. The preparation of the draft NPEF is

timely as the three Regional Assemblies are currently undertaking collaborative work with the OECD examining how strengthened multi-level governance arrangements can improve national performance, policy coherence and delivery outcomes. This work reflects growing international evidence that effective coordination between national, regional and local government leads to better investment decisions, stronger regional competitiveness and more efficient implementation of national policy objectives. It is anticipated that this report will be finalised in the coming months, and its recommendations should inform the draft NPEF.

Secondly, the NPEF should support the establishment of formal implementation structures to deliver the objectives of the RSES and MASP. These structures could include regional implementation boards, cross-sector delivery groups and programme management arrangements bringing together government departments, infrastructure providers, local authorities and State agencies. Such mechanisms would improve coordination, strengthen accountability and provide a clear governance framework for the delivery of strategic regional priorities. This would also align with the legislative requirements under Section 29 (13) of the P&D Act 2024, as amended, regarding the role of the Regional Assembly in the coordination of local authorities and collaboration of public bodies in implementing and monitoring the RSES and MASP. In addition, there is an opportunity for the Assembly to be included in and play a leading role within some of the already established bodies and taskforces, such as the Accelerating Infrastructure Taskforce and the Housing Activation Office, assisting in directly guiding infrastructure investment and housing delivery within the functional area of the Regional Assembly.

Finally, with regard to multiannual funding, dedicated funding sources and an investment framework supported by relevant government departments, and infrastructure and utility providers, would be required to support place-based investment needs and to aid in the implementation of priorities of the RSES and MASP. Adequate funding would ensure efficient coordination, knowledge sharing, timely monitoring and reporting on progress relating to the implementation of key regional policy and strategic infrastructure projects within the functional area of the Regional Assembly. Again, this would support and align with Section 29 (13) P&D Act 2024, as amended, which requires the provision of an implementation and monitoring framework for the RSES and MASP to include information on potential sources of funding for strategic infrastructure and cross sectoral investment and related actions. At present, the funding framework for the Regional Assembly relies heavily on local authorities, which places an undue burden on them.

As the 2023 OECD report notes, *'Subnational governments are, and need to be, a key part of the solutions, but they lack the resources and mechanisms to deliver on national plans and policies.'*

In relation to the monitoring of the implementation of the objectives of the RSES, the Assembly notes that Section 35 (2) of the P&D Act 2024, as amended, requires local authorities to submit a report every three years to the Regional Assembly setting out progress made in supporting the objectives of

the RSES (and Section 35 (3) permits the Regional Assemblies to request a similar report from the Minister, the NTA, the OPR, the MARA and other relevant public bodies). The above statutory monitoring function could be strengthened further by ensuring that relevant public bodies submit progress reports to the Regional Assembly when requested to inform the RSES Monitoring Report. This was an element of the planning legislation under the P&D Act, 2000, as amended (now superseded by the P&D Act 2024, as amended). In addition, the establishment of formal coordination mechanisms such as the RSES and MASP Implementation Groups and joint delivery boards would assist in the coordination and monitoring of the implementation of the policies of the RSES and MASP, which is also reflected in the recommendations of the 2023 OECD report.

The monitoring of the implementation of a sustainable, plan-led system could be facilitated by measuring specific indicators. These would include monitoring the degree of alignment of planning policies and plans across different tiers of government and infrastructure and utility providers; monitoring the efficiency of coordination in the preparation, implementation and monitoring of planning policies and plans across different tiers of government and infrastructure and utility providers; monitoring fiscal decentralisation with regard the percentage of funding directly allocated to regional and local government levels; monitoring spatial efficiencies with regard the ratio of the land consumption rate relative to the population growth rate to measure urban sprawl; monitoring strategic site delivery regarding the rate of infrastructural delivery and development within identified strategic development areas and Transport Orientated Development (TOD) sites; and monitoring sustainable mobility access with regard the percentage of people residing within a specified walkable catchment of a public transport system.

In addition, the NPEF should recognise climate consistency as an indicator of planning excellence. Recent Supreme Court jurisprudence has confirmed that relevant bodies are required, insofar as practicable, to perform their functions in a manner consistent with approved climate action plans and national climate objectives. The NPEF should therefore include consideration of how planning functions are exercised in support of these obligations and how such consistency is reflected across the planning system.

The Assembly considers that effective implementation is a key measure of planning excellence. The timely translation of national policy objectives into regional and local planning frameworks provides certainty, strengthens policy coherence and supports delivery. The NPEF should include indicators that assess the effectiveness of this process and the extent to which implementation mechanisms support the achievement of strategic planning objectives.

The benefits of an improved sustainable, plan-led planning system are multiple. Firstly, the establishment of formal implementation structures (such as regional implementation boards or cross-sector delivery groups) to deliver the objectives of the RSES and MASPs would improve coordination, strengthen accountability and provide a clear governance framework for the delivery of strategic

regional priorities. This would result in investment decisions aligned with national, regional and local plans, facilitating implementation and delivery of the objectives in these plans. In this respect, benefits include capital alignment with regard to ensuring infrastructure investment decisions align directly with identified strategic development areas and TOD sites; property market certainty in relation to creating certainty and predictability, which promotes long-term capital investments across both the public and private sectors; spatial efficiency and the promotion of compact development and TOD along existing or committed high-capacity public transport corridors, actively reversing the legacy of unsustainable commuter driven sprawl-led development model; and systemic resilience in relation to facilitating comprehensive planning approaches that mitigate the impacts of future environmental and socio-economic uncertainties. These would all assist in the implementation of the objectives outlined in the National Planning Framework 2025.

The Regional Assembly has a number of examples where it has led on innovation with regard to contributing towards a sustainable plan-led system. These initiatives include the launch of the Regional Development Monitor (RDM) in November 2022, which collates data from national agencies into key socio-economic and environmental indicators to support spatial analysis and strategic planning. The Regional Assembly also managed and coordinated the Smart and Sustainable Mobility Accelerator (SSMA) Programme for the Eastern and Midland Region. This training and capacity building workshop supported local authorities and stakeholders in accelerating the implementation of smart and sustainability active travel projects. In addition, the Regional Assembly introduced innovative approaches during the recently concluded pre-draft public consultation for the RSES review. These included using a dedicated online consultation portal to enhance accessibility and engagement, and engaging a visual artist to disseminate concise and simplified information regarding regional issues to enhance public understanding and participation.

The NPEF should, therefore, support the Regional Assemblies with appropriate implementation structures, dedicated resources and a clearly defined leadership role which will enhance consistency, accountability and excellence throughout the Irish planning system, enabling a successful, sustainable plan-led system.

2.2 Strategic Resourcing and Organisational Culture

An improved strategic resourcing and organisational culture would require a sufficient and robust workforce equipped with the right skills, mindset and dedication. This entails multidisciplinary teams possessing expertise across planning, project management, environmental science, economic development, research, engineering and related built environment fields. Furthermore, emerging specialist capabilities such as marine planning, GIS, and renewable energy are increasingly critical. A successful strategic resourcing and organisational culture fosters seamless information sharing and collaboration both internally and across external organisations. The organisational culture is

underpinned by the following core values: collaboration, adaptability, creativity, peer support, mentorship, openness, evidence-based decision making, accountability, transparency and excellence.

A number of actions are recommended to improve strategic resourcing and organisational culture within the Irish planning system. These include the delivery of continuous professional development and upskilling for both the elected members and the executive to ensure environmental and socio-economic challenges are addressed with competence, confidence, and shared ownership; the empowerment of mid-career planners into middle management roles to effectively prepare them for future senior leadership roles; the expansion of undergraduate and postgraduate placements by providing grants and scholarships to encourage young people to enter the planning profession; and leveraging modern digital technology and appropriate use of AI to streamline planning administrative tasks.

The measurement of strategic resources and organisational culture within the Irish planning system could be assisted by introducing the monitoring of specific performance indicators. These may include a focus on external engagement value and the public participation rate in plan and policy preparation; the introduction of professional support metrics where staff participation and completion rates within formal mentorship programs are monitored; the monitoring of talent pipeline to measure the job vacancy and recruitment lifecycle rates for planning roles; the monitoring of career development mobility where the internal promotion and lateral mobility rates within an organisation are measured; and workforce stability where the voluntary turnover and retention rates are measured.

There are numerous benefits to an improved strategic resourcing and organisational culture. These would include an enhanced organisation which has improved adaptability and fosters employee-led innovation; a high-performance culture that streamlines timely, evidence-based decision making; an organisation that promotes a proactive, plan-led planning system; and a reduction in voluntary staff turnover rates, thereby retaining organisational knowledge and enhancing public trust.

An example of where the Regional Assembly has already contributed towards improved strategic resourcing and organisational culture is in response to the Ministerial Action Plan on Planning Resources 2024 and the subsequent inclusion of Town Planners on the Critical Skills Occupations List. In this respect the Regional Assembly has recently recruited an executive planner from a non-EEA country and will document key learning outcomes and insights on best practice regarding seeking to recruit planning professionals from abroad.

2.3 Citizen Centred Service

An understanding of citizens' expectations, experiences and core drivers of satisfaction is key to the success of citizen centred services within the Irish planning system. This would entail the co-production of planning policies and plans with the end users and affected communities. This approach moves beyond traditional consultation by ensuring that emerging plans and policies directly address

the environmental and socio-economic needs of residents in a proper and sustainable manner. Ultimately, a successful citizen centred service should be highly accessible (both digitally and paper-based), simplified, inclusive and informative.

To improve the citizen centred services within the Irish planning system, several measures should be implemented. Firstly, the understanding of community needs by undertaking relevant studies and engaging communities early to encourage evidence-led planning. This could be achieved by undertaking Social Infrastructure Audits, housing studies, socio-economic assessments and other relevant studies and assessments to create a solid evidence base. Secondly, increasing the availability, accessibility and use of online planning platforms and digital mapping. This ensures the planning resources (reports, studies, planning decisions) are accessible to all. This also enables members of the public to engage in the planning process and submit observations on plans and policies, fostering engagement and cocreation. Finally, the fostering of collaboration and partnerships. This should be prioritised during planning, implementation and monitoring stages to inform best practice. In this respect the provision of timely feedback to the relevant stakeholders will ensure transparency and build institutional trust.

In order to measure the delivery of citizen centred services, a number of performance indicators are proposed. These include measuring public satisfaction levels with the planning system, including in relation to the percentage of citizens satisfied or dissatisfied with planning proposals, decisions, policies and plans; measuring the level of citizen engagement and cooperation in the preparation of policies and plans; and finally measuring the accessibility of planning resources and data published across different tiers of government.

The key benefits of delivering improved citizen centred services within the Irish planning system would include: systemic efficiency as a result of streamlined and robust decision making across all tiers of government; a reduction in litigation which would enhance transparency and build institutional trust thereby minimising the number of timely and costly judicial reviews; and benefits to the common good as a result of the creation of responsive, evidence-led policies and plans that reflect local and community needs.

An example of innovation within the Regional Assembly that has contributed to improved citizen services is the launch of the RDM, which also acts as the hosting platform for the National Census Atlas. The National Census Atlas provides for publicly accessible visual and interactive maps and analytics, where census figures relating to over 200 datasets covering demographics, housing, employment, economy, transport, communications and ICT are analysed and accessible. This interactive data hub has promoted access to key spatial data, which has fostered informed decision making, enhanced public engagement and greater transparency.

2.4 Transparency

Transparency is an important aspect of the Irish planning system in that it is fundamental to democratic governance, it builds public trust, it facilitates accountability, and it promotes citizen engagement. It involves the maintenance of an up-to-date, searchable database by all planning authorities, thereby promoting greater accountability and trust. Public trust is further strengthened when governance processes are visible, consistent, and clearly articulated.

At the regional level, transparency can be enhanced by reviewing and updating the Code of Conduct for Councillors, issued under the Local Government Act 2001, to include a new section on multi-level governance and climate action. This update will assist members in exercising their mandates within the context of multi-level governance obligations arising from EU law, international agreements and national legislation on climate action, biodiversity and sustainable development. While these obligations shape planning, infrastructure and regional development decisions, the existing Code provides limited guidance on how members should discharge their responsibilities. Thus, reviewing the Code will reinforce transparency, public trust, align Ireland with Council of Europe recommendations, and provide members with a statutory anchor for navigating the complex governance challenges, public expectations and political divisions.

Furthermore, the 2023 OECD report recommends that a democratic mandate should be considered for regional government in Ireland, to ensure that Regional Assemblies have the political legitimacy to deliver on their mandate, particularly considering the emergence of new local entities such as MASPs. The report considers that a directly elected Regional Assembly can continue to promote collaboration across county lines while also becoming a body of constituent members that is more invested in the role of the regional level of government as a legitimate provider of strategies and investment decisions.

The Regional Assembly already sets an example in setting high levels of transparency in the organisation by ensuring that all submissions, reports, studies, minutes of Assembly meetings, planning documents (RSES and MASP) are accessible online on the EMRA website. Furthermore, data and mapping tools such as the RDM and National Census Atlas have promoted access to key spatial data, which has also fostered informed decision making, better engagement and transparency.

2.5 Digital Performance and Innovation

Best practice in digital performance and innovation in the Irish planning system relies on an integrated planning and spatial data system that provides a seamless, end-to-end user experience. To achieve this, the RDM can be enhanced into a premier digital platform by incorporating expanded monitoring layers and indicators including those related to climate action targets, environmental quality indicators, and regional renewable energy capacities.

To accelerate digital performance and innovation within the Irish planning system, strategic measures should be considered. These include the integration of inter-governmental system integration. This would involve the establishment of a structured collaboration between different tiers of government to deliver a streamlined, and user-friendly online spatial data system. The enhancement of the existing RDM represents the most economical and practical mechanism to achieve this. In addition, enhancement of the planning-related education curriculum by embedding advanced GIS and spatial data analytics would result in the modernisation of undergraduate and postgraduate planning curricula. This ensures that graduate planners possess the requisite digital capabilities to manage, optimise and improve contemporary planning infrastructure.

In order to measure digital performance and innovation within the Irish planning system, a number of performance indicators are proposed. These include the promotion of digital platform engagement by measuring the number of users who interact with and use online planning portals; and technical capability upskilling by measuring the number of planners who have received continuous professional development (CPD) and upskilling in advanced GIS and spatial data analytics and data quality including the verifiable level of spatial data accuracy and the frequency of real-time platform updates.

One of the key benefits of improved digital performance and innovation within the Irish planning system would include the availability of spatial data. This would improve public access to up-to-date data, and it would promote evidence-led decision making aligned with climate action objectives, proper planning and sustainable development concepts; and the efficiency of operations. In addition, this would streamline planning processes and improve decision timelines, thereby mitigating institutional bureaucracy and administrative delays. Finally, it would facilitate consensus and transparency by cultivating meaningful stakeholder involvement while directly improving public transparency and trust.

As highlighted previously, an example of innovation within the Regional Assembly that has contributed towards digital performance and innovation includes the launch of the Regional Development Monitor (RDM) in 2022. As a result, this was a joint winner in the Research and Innovation category at the Irish Planning Institute Awards 2023, and the National Census Atlas, a mapping tool which was launched on the RDM platform in 2025, was Highly Commended in the Research and Innovation Category at the Irish Planning Institute Awards 2025.

3.0 Recommendations/Observations

Below are **observations** by the Regional Assembly for consideration in the preparation of the draft NPEF.

1. The National Planning Excellence Framework should recognise the strategic leadership role of the Regional Assemblies, including support for formal implementation structures to deliver the Regional Spatial and Economic Strategies and Metropolitan Area Strategic Plans.
Reason: To strengthen multi-level governance, improve coordination between national, regional and local government, enhance implementation of the Planning and Development Act 2024, and support excellence in planning through effective delivery and monitoring of regional strategies.
2. The implementation of the recommendations outlined in the 2023 OECD report 'Towards Balanced Regional Attractiveness in Ireland', to include the provision of multiannual funding for Regional Assemblies, the Regional Assembly serving as a primary coordination forum bridging national Government departments and local authorities, and consideration for a directly elected Regional Assembly.
Reason: To support a successful planning system within Ireland, including facilitating the delivery of the National Planning Framework 2025 and aligning with the provisions of Section 29 of the Planning and Development Act 2024, as amended.
3. A review of the Code of Conduct for Councillors, issued under the Local Government Act 2001, to include a new section on multi-level governance and climate action.
Reason: To modernise the existing Code to reflect the current and expanded obligations of elected members.
4. The expansion of and support of the further development of the Regional Development Monitor.
Reason: To support plan-making and timely decision-making and enhancing digital performance and innovation.
5. Amendments to the planning legislation outlined in Section 35 of the Planning and Development Act 2024, as amended, to include the requirement for public bodies to report on progress in implementing the objectives of the RSES.
Reason: To facilitate the monitoring of the RSES.

4.0 Conclusion

The Regional Assembly welcomes the extensive preparatory work by the DHLGH in engaging with several stakeholders to inform the preparation of the draft NPEF.

The Regional Assembly welcomes further opportunities to engage in the next stages of the NPEF preparation and notes that officials of the Assembly are available to discuss any of the matters raised above.

Regards,

A handwritten signature in cursive script, appearing to read 'Clare Bannon', positioned above a horizontal line.

Clare Bannon,
Director
Eastern and Midland Regional Assembly
3rd July 2026