

# NPF Issues paper – Eastern and Midlands Regional Assembly

## Background

The Eastern and Midland Regional Assembly (EMRA) engaged with key regional stakeholders and the executive of its 12 constituent Local Authorities to discuss the Issues and Choices documents that were published as part of this initial phase of the preparation of the National Planning Framework Ireland 2040. This submission, prepared and presented by the executive of the assembly, is a synthesis of the engagement with key regional stakeholders and follows on from the submission made by the members of the regional assembly at its meeting of the 10<sup>th</sup> March 2017.

The assembly executive welcomes the statutory basis for a new National Planning Framework (NPF), which should provide a stronger framework for regional and local policy, however there is some concern around the ambitious timeframes for delivery and limited engagement with local government in the development of the Issues Paper. There is a clear need for national policy that sets the framework for future investment, infrastructure and sustainable development decision making, and in this regard we welcome the opportunity for further input into the Draft Plan formulation process.

The comments, observations and opinions of our key stakeholders have informed the content of this submission, which primarily addresses the Choices and Issues paper as presented for public consultation. This submission also includes additional commentary towards the development of a clear vision and role for the region, which is complementary to the development of a vision for Ireland 2040 and other matters for consideration in the formulation of the NPF.

## What should Ireland look like in 20 years?

The NPF needs to lead with a clear vision for Ireland 2040 and beyond which is future orientated but also flexible enough to respond and adapt to future changes. It should be underpinned by an evidence based socio-economic analysis, a realistic economic strategy and an effective strategic environmental assessment that seeks to maximise economic, environmental and social benefits for all citizens.

Key to this vision will be the protection and promotion of Ireland's image as a prosperous, green and friendly country where people have access to high quality affordable accommodation in liveable communities with a range of accessible transport, employment and leisure options and good community, health and education services.

It is vital that the NPF vision seeks to harness the strengths of all regions allowing them to develop unique regional propositions that complement the overall vision for Ireland 2040.

## Policy principals to frame a regional vision

The EMRA welcomes the setting of the NPF on a statutory basis at the apex of a nested planning hierarchy and would welcome the incorporation of the following key principles to frame the development of Regional Spatial and Economic Strategies for each of the three Regional Assemblies:

- **Economic strategy** that seeks to ensure that all regions fulfil their economic potential by playing to local economic strengths, branding, natural assets and human capital and that recognises the key role played by Dublin and the Eastern and Midland Region as the national economic driver.
- **Spatial framework** for the distribution of development within each of the regions, which sets out clear criteria for future investment, strategic infrastructure and sustainable development including the selection of strategic locations for targeted population and economic growth.
- **Urban consolidation** underpinned by cross cutting fiscal and statutory incentives to promote higher densities, target vacancy and enhance urban quality within a defined metropolitan area and key settlements and to restrict dispersed forms of urban generated development.
- **Strategic alignment** between long term planning and capital investment to ensure the timely provision of critical infrastructure in line with population and employment objectives, which requires a whole of government approach and interagency buy in for implementation.
- **Evidence based** The NPF must be underpinned by a robust socio economic evidence base, with key metrics and indicators to inform the monitoring of plan implementation and formal review.
- **Environmental framework** to set out high level policy for transition to a low carbon and climate resilient society with an increased focus on maximising existing resources and quantified targets for reducing emissions and increasing renewables and energy efficiency.

### Realising the potential of the Eastern and Midlands Region

The Eastern and Midland Region (EMRA) is the smallest of the three Irish Regional Assemblies in terms of land area, however it accommodates a population of over 2.3 Million, which is home to nearly half (49%) of the country's population and accounts for over two thirds of national population growth in the intercensal period between 2011 and 2016. Key to the success of the NPF will be the development of a clear and realistic spatial and economic strategy that recognises both the existing and future needs of the people who are living and working in the region.

The population profile of the region is young, diverse and vibrant. Counties like Fingal, Kildare and Laois are home to young families with around quarter of their populations under 14 years, while Dublin city attracts a high proportion of young educated workers attracted by quality of life, range of services and employment opportunities. Other counties such as Dun Laoghaire Rathdown and Longford have relatively older populations with a greater demand for age friendly services.

The region is also characterised by highly contrasting areas of affluence and deprivation, both urban and rural which will require targeted policies to promote social inclusion. Over 18% of residents in the EMR were born outside of Ireland, which leads to greater cultural diversity and innovation but also brings challenges in planning for integration and participation.

The region has a varied tourism offering and is home to areas of immense natural beauty and interest such as the Wicklow and Slieve Bloom Mountains, numerous rivers such as the Shannon, lakes, waterways, fens, bogs, and forests. The eastern seaboard with its necklace of coastal villages and 10 blue flag beaches, stretches from Carlingford Lough and the UNESCO designated biosphere of Dublin Bay to Kilmichael Point.

The region also has as a rich culture and heritage from Prehistoric, Celtic, Viking and Anglo- Norman heritage to the Dublin city of Literature and international visitor attractions including the Guinness Storehouse, Book of Kells, Dublin Castle and Kilmainham Gaol, Glendalough and Clonmacnoise which brings positive economic benefits to the country.

Tourism is the largest indigenous industry in Ireland and visitor numbers continuing to grow with Dublin Airport the fastest growing airport in Europe in 2016 at 28 million passengers in 2016. The region has nearly 68,000 beds with Dublin hotel occupancy the highest in Europe, however issues around accommodation supply and rates may need to be addressed to ensure continued growth and counteract any negative impact of Brexit. Dublin should be seen as the gateway to the region with the development of interregional tourism products such as the Dublin to Westport Greenway, the Mid Shannon Wilderness Park, Lough Boora and Longford Center Parcs resort as well as the promotion of the heritage sites at Brun a Boinne, Kells, Clonmacnoise, Glendalough and Tara.

The value of regional Green Infrastructure should be recognised from a tourism perspective and as a key part of our natural capital, which provides protection for human and environmental health and for climate change mitigation and adaptation. The EMRs green infrastructure includes our coast, rivers and wetlands, farmland, woodlands, parks and open spaces and nature conservation areas. Key strategic green and blue corridors include the Eastern coastal route, Royal Canal Way and Grand/Barrow Canal Way, Wicklow Way, Shannon Greenway and the Slieve Bloom Way. The national cycle network, including the emerging Dublin to Galway cycle route form part of this regional green infrastructure.

The region is strategically located on part of the trans-European transport network from Belfast to Rosslare Europort and is linked to the U.K. across the Irish Sea. Dublin Port is a major trading centre which has seen sustained growth with volumes expected to increase exponentially by 265% over the 30 years to 2040. There are a number of emerging economic corridors with strategic landbanks including the Swords- Airport expansion zone and the 'Digital Payments' Corridor along the M1 Dublin to Belfast corridor. The national motorway corridors have a number of Strategic Development Zones and major employment centres extending west from the coast and the city's 'Silicon Docks' through Grangecastle, D15 Adamstown and Clonburris along the Naas Road to the Kildare knowledge corridor. The region also provides connections to the west and south of the country with key locations such as Athlone, Dundalk and Longford providing gateways to the west and north.

Planning for the region will need to take account of how best to maximise the region's potential. This requires the equitable and proportional distribution of growth, maximising investment in key infrastructural assets such as the public transport network, inter-city motorways, the Water Supply Project for the Eastern and Midlands region, digital infrastructure and Port/Airport international gateways and the further development of linkages north, south and west within our region will add to our overall success.

### [The Eastern and Midlands region as an economic engine.](#)

The eastern and midlands region is the key economic driver for Ireland, contributing over 55% or €94 Billion of National Gross Value Added (GVA), with actual economic growth nearly doubling between 2000 in 2014 and expected to continue at a steady pace. There is some concern about the lack of

focus on the Eastern and Midlands Region in the Issues Paper and the emerging narrative of a significant step change away from Dublin, given its significant role in the national economy.

The NPF Issues paper acknowledges the need to include the economic dimension, however there is little or no supporting evidence or economic analysis to support the policy position, presented in the issues and options paper. On the basis of past trends, current demographics and future population projections, it is likely that growth will continue to be focussed on accessibility to the capital city and its skilled labour force.

With Dublin at its economic heart, the region contains a strong mix of local enterprise and multinationals providing jobs in diverse and emerging sectors such as financial and business services, creative and design industries, ICT and software, Pharma, Medical Pharma and Industrial products and indigenous Tourism, Agri-Food, Retail and Entertainment sectors.

The NPF should identify, and plan to develop, specialisation and clusters such as agricultural and food production in Fingal, the Boyne Valley and the Midlands, the film industry in Wicklow, equine in Kildare and Meath, Tourism and renewables in the Midlands and ICT, traded services and Data Analytics in Dublin. There are also the port development opportunities at Wicklow, Arklow, Drogheda, Dundalk and Bremore Ports and the increasing growth of the two main gateways for people and freight to the country; Dublin Port and Airport which should be recognised and supported.

The Midlands region has huge potential to further develop the green economy/renewable energy opportunities, as well as tourism, agri-business and the rural economy. In order to effectively realise rural potential there may be a need to for local economic strategies to help some communities shift to more tourism and natural asset based local economies.

A cluster of universities, institutes and research centres support innovation and upskilling a young, and multi-cultural workforce. The key regional role of the ITs should be recognised including Dundalk IT, Athlone IT and the proposed new Technological University for Dublin. Carlow IT has interregional links with Laois and with the Wicklow Campus.

There is a need for further spatial economic analysis which sets out realistic growth scenarios to enable each region to fully realise their economic potential and contribute to the overall growth and prosperity of the State. NPF policies should not seek to artificially constrain the development of Dublin, which may potentially hinder national economic growth, but seek to enable each region fulfil its own potential through tailored people and place based policies.

Suggestions for submission to NPF:

- **Data and evidence** to inform economic strategy should consider data sets as adjusted gross national income, gross value added in traded and non-traded sectors, disposable income, etc. in addition to use of GDP/GNP, also there should be spatial evidence and use of locational data on clustering and specialisation.
- **Economic modelling** is welcomed to prepare scenarios to inform policy making, however consideration should be given to the model inputs to date, use of Census 2016 data and the nature and scale of the model outputs.
- **Strategy making**, the use of national modelling may limit the potential for spatial economic outputs and therefore the evidence behind spatial economic policy making. There should be robust development scenarios that are developed at sub national scale to inform the NPF.

- **Monitoring** the evidence, data and modelling should be integral to the NPF and informed by the use of indicators for the monitoring of NPF implementation, which are usable at national, regional and local scale.

### Place making

The main settlement centre in the region is the Dublin metropolitan area which is supported regionally by key strategic county towns and an extensive rural hinterland. Dublin, as the only city region of metropolitan scale in Ireland is competing internationally to attract talent and investment. The city region has been highly successful in developing its economic strengths with a growing reputation as a high-tech hub for ICT, international and financial services. Dublin is still small by international standards and in order for the country to compete internationally Dublin should be supported by the NPF to fulfil its potential, to sustainably grow and to maximise the economic ability, for the betterment of the national economy. Current growth forecasts, both regionally and nationally by state agencies may not be realised if the NPF is to hinder the potential of Dublin, in this regard there should be a definition of the city region or a development boundary to define the area of urban consolidation, reference is made to the Dublin Metropolitan Area as a policy tool in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022.

While the Assembly would support the development of 'second tier' regional cities, it is suggested that this should not be achieved through policies that seek to artificially constrain the growth of Dublin. The NPF should instead seek to ensure all regions fulfil their economic potential through the development of people and place based policies that play to their own economic strengths, natural assets and human capital and complement rather than compete with each other.

The previous National Spatial Strategy saw the emergence of a 'donough' effect with long term decline of population in city centres and strong population growth in the surrounding commuter belt catchment. There is a need to refocus efforts to 'fill in the donough' and unlock the capacity of strategic landbanks including already identified Strategic Development Zones at Dublin Docklands, Grangegorman, West Poolbeg, Hansfield, Adamstown, Clonburris and Cherrywood. Investment in supporting infrastructure, public transport, walking and cycling and the public realm, will be key to create attractive urban neighbourhoods.

Within the Dublin Metropolitan area, Blanchardstown is now the largest urban area in the country and is bigger than Galway or Limerick cities with over 100,000 population, furthermore, comparable to the size of Cork city are the West Dublin settlements of Tallaght, Lucan and Clondalkin, which have a combined population of over 200,000. Significant settlements of scale such as Swords, Drogheda, Dundalk, Navan, Nass and Bray have potential for further growth, and settlements such as Portlaoise, Balbriggan and Newbridge have experienced the greatest growth nationally. NPF policy needs to recognise the distinct nature of these settlements within the Dublin region and address infrastructure and housing blockages to maximise their potential, given their location and existing resources.

In the region, some of the fastest growing settlements in Ireland 1996-2016 were small towns and villages in Fingal, Meath, Laois and Kildare, such as Ratoath and Sallins where population growth did not always bring additional investment in employment or local services, resulting in long commuting times and a serious negative impact on quality of life. There is a need to recognise the important supportive role for Dublin that these settlements provide and also to set out criteria and analysis to

promote sustainable forms of development for these satellite towns, and to ensure their residents enjoy a quality level of service provision.

Conversely, there will also be a need, at national level, to address ways of managing spatial development in places that have not been selected for growth. This includes rural areas under urban generated pressures but also parts of the Eastern and Midlands which are outside the sphere of Dublin and may have experienced population decline. In protecting and enhancing the unique identity of rural Ireland, a clear definition of what is considered 'Rural' would be beneficial and clear recognition of the supportive role of towns and villages for their rural catchments.

Further policy and mechanisms at a national level would be beneficial to provide alternatives to individual houses in the countryside. This includes enhancing the vitality and viability of rural towns and villages through clustered forms of development and dealing with issues such as parking, retailing, vacancy, closure of services and infrastructure provision, in some rural based settlements.

There is a need to ensure the protection of the agriculture industry and the rural landscape that supports it. This includes recognising the value of horticultural land and addressing development pressures and the potential impact that Brexit may have on agriculture and food exports throughout the region. There is a huge potential to harness the marine resources within the region, which encompasses the Irish and Celtic Seas including the coastline, islands, fishing and offshore resources. There is potential to develop the brand potential of the Dublin Bay Biosphere designation and develop tourism and recreation opportunities of inland waterways.

The advent of Brexit also underscores the need to strengthen All Island links such the Dublin-Belfast axis and facilitate high speed transport connectivity along this route, extending south along the TENS Route. There is support for the enhancement of links between Dublin and the Midlands with the potential to drive regional development and create a strong East-West axis.

To build inter regional potential a consideration of cross boundary issues should to be addressed at location such as Drogheda-Newry, Athlone and Graiguecullen-Carlow. There is an opportunity for the NPF to demonstrate leadership in realising the opportunities that exist in settlements and their wider catchments where they extend into other administrative boundaries, which also define traditional land use planning. Furthermore there is an incoherence between the administrative boundaries of the Regional Assemblies and other agencies, which a whole of government approach could address.

Suggestions for submission to NPF:

- **Urban consolidation.** Main existing policy of consolidation of the metropolitan gateway and higher order settlements in order to maximise return on investment in infrastructure and services where it can benefit the most people. This will require high level policy support for higher densities in urban centres and to restrict urban generated settlement in rural areas, while protecting the rural economy and communities.
- **Incentives** for the development of urban and brownfield sites over greenfield sites to include mechanisms to make serviced one-off sites available within settlement centres and fiscal incentives to target vacancy, obsolescence and offset higher urban building costs.
- **Infrastructure** To become economically competitive at a macro level, there is a need to address infrastructure and housing blockages and assess potential for growth along key transport corridors, to optimise investment in the rail network and identify strategic growth nodes at the intersections of orbital and radial routes.

- **Inter regional.** The NPF presents an opportunity to build stronger links north, south and west and to address inter regional boundary issues, and to realise these opportunities.
- **Boundary definition** to provide clear policy direction to better reflect the function of metropolitan areas, and to promote the policy of urban consolidation.

## Environment

The NPF must set the national framework and policies for a transition to a long-term vision of a low carbon, climate resilient and environmentally sustainable economy by 2050, and to set out requirements to meet our EU emissions and energy targets for 2020 and 2030. Action is required particularly on reducing carbon emissions from transport, the built environment, agriculture and energy production.

There will be a need for high level policy to support greater integration of transport and land use in the planning of sustainable neighbourhoods, the optimisation of investment in existing transport infrastructure and increased investment in a range of sustainable transport solutions. The provision of adequate green spaces and modal shift use to public transport and active modes of travel (walking and cycling) will not only enhance the liveability of our cities, but also help reduce emissions towards a low carbon society.

As Ireland starts to significantly increase its residential output it is timely to consider ways to improve the energy performance of future housing provision, which would drive green economic opportunities in the construction industry and help future proof our building stock. There should also be policy support for retro-fitting of existing stock, to reduce energy demand, address fuel poverty and improve human health. This may require mechanisms to improve building standards and materials and incentives to balance the costs associated with providing energy efficient buildings.

To meet our energy targets, we need to better leverage natural resources to increase our share of renewable energy. There is an established tradition of energy production in the Midlands by state agencies, however national environmental policies are dictating the wind down of traditional fossil fuel powered stations, such as peat fired plants in the Midlands. There is a requirement for leadership in this regard by the NPF to support these agencies in a transition to renewable alternatives and to develop the green economy and local employment opportunities in the Midlands.

To date the Eastern and Midland Region has already provided a significant amount of renewable energy projects, however some windfarm developments have progressed in an uncoordinated manner which is primarily speculative and developer led. This is beginning to be replicated in the development of large scale solar energy projects in the absence of any strategic analysis. Consideration should be given to the development of high level policy guidelines to inform the location of energy zones and to ensure that communities impacted by energy developments can appropriately benefit.

There should also be consideration of the need to move towards more sustainable forms of agriculture and food production. This may require a recognition of potential policy conflicts and guidance on how to balance apparently contradictory climate change and agri-food policies in Food Harvest 2020 and Food Wise2025.

Green infrastructure can provide natural solutions and cost effective alternatives to physical or 'grey' infrastructure and should be fully integrated into all levels of spatial planning and development policy. Green Infrastructure can be strategically planned to deliver a range of eco system services such as the protection of environmental quality and biodiversity, human health and recreation, flood alleviation and climate mitigation and adaptation. The region has a number of nature conservation areas which have huge recreational potential as well as environmental significance from Dublin Bay to the Dublin and Wicklow Mountains to the peatlands, bogs and wetlands of the Midlands.

Blue Infrastructure includes the major coastal resource including the Celtic and Irish Seas, Dublin Bay and a number of major ports and harbours. There needs to be an explicit recognition of the value of inland waterways (rivers and canals) as a natural asset and for the development of tourism and recreation. In this regard the NPF should set the framework for the identification and mapping of a strategic network of Blue and Green Infrastructure.

Suggestions for inclusion in the NPF:

- **Transport** Clear policy on reducing fossil fuel emissions from transport by maximizing the use of existing resources and increased investment to support a shift towards public transport and sustainable modes of travel
- **Buildings** Clear policy on reducing energy demand and increasing energy efficiency in new buildings, and support for upgrades to existing residential stock to reduce home heating costs and energy use and improve human health.
- **Energy** Clear policy to support the decarbonization of electricity generation and guide the strategic development of renewable energy project to meet climate change targets.
- **Green Infrastructure** Recognition of the value of our 'natural capital' and support for the identification, mapping, strategic planning and management of green infrastructure to deliver eco-system services of benefit to both man and nature

## Infrastructure

The fact that the region contains some of the fastest growing communities in the country, has led to increasing demand for housing, infrastructure and local services. The counties influenced by Dublin generated growth in particular are experiencing severe housing, transport and water infrastructure bottlenecks which will need to be addressed to sustain international competitiveness of the city and the country. Existing settlements within the sphere of influence of Dublin have grown at a rapid pace, the fastest growing settlements in the country are primarily in our region. These settlements have experienced rapid urban housing growth without the requisite physical and social infrastructure to match, this will require the more costly retrofitting of infrastructure to ensure an acceptable level of service for these residents.

This service level demand is also coupled with the severe housing demand where significant zoned land and numerous key sites are not realising their planned growth due to key infrastructure blockages. The majority of these lands are in sustainable locations that meet the key principles of consolidation of existing urban areas, but due to the upfront capital requirements for infrastructure



they are not being realised. This is leading to development pressure on cheaper to develop, peripheral sites in more remote locations, where the service cost is placed as a long term burden on the state.

Investment in infrastructure is considered the key driver for development, this investment should be directed spatially by policy in the National Planning Framework. This requires a whole of government approach to ensure that these state providers align with, and invest in the spatial policy expressed in the NPF. There should be a requirement for all the infrastructure bodies to input to this process and for their strategies and policies, and thus capital plans, to be reviewed to align with the NPF and the upcoming Regional Spatial and Economic Strategies to ensure delivery of the stated NPF aims.

### *Transport*

It is widely accepted that the road network serving Dublin is constrained at peak periods and that increasing private car trips cannot be sustained. The mode shift to public transport is widely encouraged and embedded in local planning policy. However there are key projects that will lead to an unblocking of the system, opening up significant additional capacity and allowing the realisation of key growth sites.

Dublin needs more certainty around the provision of priority public transport projects, including Metro North (providing a strategic link between the city and Airport), DART underground (providing a strategic link between all Rail, DART and Luas services) and Rail expansion (providing the capacity for urban consolidation and strategic growth areas).

In the wider region there are rail corridors where the state has placed significant capital investment, these corridors are strategic all Ireland corridors and should be considered as key growth corridors for 2040. Key growth nodes can be identified on these corridors where a level of development should occur, both economic and population that whilst benefiting from accessibility to Dublin can develop to a critical mass. These key nodes will create their own regional sphere of influence and level of service provision and in turn could attract 'reverse commuting' from Dublin.

Public transport is only a viable transport option where there is sufficient critical mass, to allow reasonable competition with the private car, and it is accepted that those areas with less accessibility to Dublin may not achieve the sufficient critical mass. However these areas should benefit from investment in the local road network and in soft mode infrastructure to facilitate mobility.

There is an extensive radial road network from Dublin and the advent of the motorway part of this network has generated growth along these corridors over the past few decades, based on this accessibility, there is a poor north – south network in the region, This has exacerbated the demand placed on the national motorway network, and could be relieved by investment in key routes that would improve north – south and intra-regional connectivity.

### *Water*

Irish Water have identified key projects for the Region, at a national scale is accepted that water supply for the wider Dublin area is at critical levels of demand and to facilitate further growth, prioritisation of water supply should occur specifically the Water Supply Project for the Eastern and Midland Region. This is key for the region as the benefiting corridor for the project will provide a new water supply for

most of the region and therefore can be a key element of realising potential across the region. There is also economic potential to be realised in water supply capacity and recent experiences of significant economic development proposals being hampered by a lack of supply, or commitment to supply is considered a key blockage in areas realising that economic potential.

#### *Wastewater*

There are still a significant number of settlements in the region that are not compliant with urban waste water directive notices including several settlements of a significant scale as identified by the EPA. This has proven to be a barrier to some key urban settlements in the region not realising their stated growth potential and demonstrates the need for a joined up approach to infrastructure investment.

#### *Digital Infrastructure*

There has been significant investment in the more urbanised areas of the region in broadband provision, however the more peripheral parts of the region suffer from a chronic lack of investment, where the lowest speeds in the country are experienced. This highlights the levels of diversity in service provision in the region, and therefore the roll out of the national broadband scheme is supported.

Suggestions for submission to NPF:

- **Strategic Infrastructure** to be clearly supported in the NPF and key development areas to be prioritised for capital investment.
- **Infrastructure Agencies** to be directed by a whole of government approach to align strategy, policy and investment with that of the NPF and to invest accordingly
- **Rational and justification** for selection and prioritisation of infrastructure investment, including a multisector capacity study to inform same.

### Implementation

As stated in the National Planning Framework: Ireland 2040 Our Plan Issues and Choices, implementing the NPF is as important as preparing the policy, there is a need for a whole of government approach to implementation and investment, and a wider political and institutional commitment. In order for national spatial policy to be realised there must be political leadership, this leadership must also be demonstrated in the formulation of the plan. If this does not occur then the process may produce results similar to the last national spatial strategy, and be considered in the same light.

Crucial to implementation of the NPF is clarity on how it will be implemented, who will implement it and how this implementation will be measured. With regard to how; there needs to be clarity in vision and policy direction in the NPF to inform the plan making at a regional level in Regional Spatial and Economic Strategies and at a local level in Development Plans. A clear policy hierarchy and vertical policy thread is required to demonstrate how the NPF is being implemented, this clarity will also ensure the focused delivery of investment at a local level, that realises the NPF vision.

The main body that will implement the NPF are the local authorities through city and county development plans and local economic and community plans, therefore it is crucial that the NPF is legible and relevant for these policy makers.

The measurement of the NPF implementation will be a crucial element to be considered in the preparation of the plan, it is advocated that an all-Ireland, all sectoral evidence base is prepared, including up to date Census 2016 data. That will inform the policy formulation and in turn is used for monitoring of the plan, through the creation of indicators, which then feeds back into a review process of the plan. This policy cycle is standard practice in plan making and can be adapted from Fischer, F., & Miller, G. J. (Eds.). (2006). *Handbook of public policy analysis: theory, politics, and methods*. crc Press.

Suggestions for submission to NPF:

- **Evidence** base fit for purpose with indicators at a national, regional and local level that can be used to inform policy making and monitor policy implementation
- **Whole of Government Approach** to ensure that all agencies align strategy, policy and investment with that of the NPF and to invest accordingly
- **Clear vision and leadership** a singular clear focus for all users and implementers of the NPF

## Conclusion

This submission has brought together comments, opinions and positions from the 12 local authorities in the eastern and midland region who will be key stakeholders in the implementation of the national planning framework. There are strong issues of commonality amongst these stakeholders in particular, the role and importance of Dublin in the future of Ireland; the physical attributes, economic engine, social demographic and expanding population in the region; the role of settlements of significant scale and the role of rural Ireland; the need for leadership and a whole of government approach; focused and justified investment in infrastructure; and the requirement for an evidence based policy making, monitoring and review cycle of plan approach.

The Regional Assembly welcomes the opportunity to engage formally on the process of preparing the National Planning Framework and the executive looks forward to continuing engagement with the NPF team.

Regards,



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Jim Conway

Director

Eastern and Midland Regional Assembly

21<sup>st</sup> March 2017