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12<sup>th</sup> September 2024

## RE: Longford County Council Submission to Draft Revision to to NPF

Dear Sir / Madam,

Please find attached submission to the Draft First Revision to the National Planning Framework made on behalf of Longford County Council. This submission is made on behalf of both the Executive and the Elected Members. Elements of the Revision which are welcomed are briefly listed while areas of concern are subsequently addressed in more detail.

### Elements of First Revision Supported by Longford County Council:

Longford County Council welcome the following elements which have been included in the proposed revisions::

- Continuation of the focus on balanced regional growth.
- Recognition of the need to deliver at least 50,000 houses each year.
- Recognition of sustainable, city-based population and employment growth.
- Recognition that rural can also deliver sustainable growth.
- Support for the delivery of Active Travel Infrastructure and Sustainable Mobility.
- Recognition of the State's Marine Potential.
- Recognition of the potential impacts of Climate Change on our Coastal Communities and Environment.

- Emphasis on delivery renewable energy targets.
- Recognition of the key role that offshore renewable energy needs to play in achieving renewable energy targets and that port infrastructure is important to delivering the offshore capacity.
- Recognition of the need to upgrade the national power grid.
- Enhanced focus on managing the Climate Transition, Climate Adaptation/Mitigation, moving towards a Zero Carbon economy and delivering the Circular Economy.
- Importance of Protecting, Conserving and Enhancing our Natural Capital and the increasing importance of moving to nature based solutions where appropriate.
- Important role of National Biodiversity Action Plan and the EU Nature Restoration Law.
- Recognition that there is a need for more alignment between the NPF and the NDP and the plans of the statutory infrastructure providers; and,
- Importance of Land Activation and Active Land Management.

### Areas of Concern and Associated Recommended Changes

However Longford County Council has a number of concerns and recommend changes in the following subject areas:

#### **1. Population Growth:**

Population projections and proposed number of households (as per ESRI Report) should align. There needs to be a robust analysis and data that supporting targets set within the NPOs. The figures in the ESRI report do not account for pent up demand, therefore, this along with potential for medium – high migration and accommodating all those in direct provision and already here will require careful analysis and consideration.

In the intercensal period 2016-2022, the Eastern and Midlands region continued to outperform the Southern and Northern & Western regions. Analysis by the ESRI on population growth to 2040 sets out 59% of growth occurring in the Eastern and Midland region – representing a ‘business as usual’ outcome for the State. [Population projections, the flow of new households and structural housing demand \(esri.ie\)](https://www.esri.ie/publications/population-projections-the-flow-of-new-households-and-structural-housing-demand) sets out the scale of the challenge informing the NPF and highlights the necessity for

targeted investment in the key enablers for change.

A co-ordinated 'whole of government' response will be critical to the successful meeting of these challenges.

## 2. Housing Delivery:

Housing delivery is a key enabler of population growth. Coupled with jobs, housing provision will play a critical role in delivering the vision of the NPF – in terms of housing location and housing form (higher density, compact growth).

During 2022 and 2023, nationally there was in excess of 75,000 new houses and apartments granted planning consent. Coupled with extant residential consents, this represents a multi-annual supply of houses and apartments with planning consent within the State. [BHA14 - Planning Permissions Granted for New Houses and Apartments \(cso.ie\)](#)

However, while 2023 was the largest annual delivery of homes in the State in 15 years at just under 33,000 ([gov - Housing for All update - 25 January 2024 \(www.gov.ie\)](#)), housing completions are lagging significantly behind planning consents. This pattern is evident at many growth locations identified under the NPF.

While activation barriers at the site level can vary, there is significant evidence that housing viability / affordability for first time buyers remains a significant barrier to accelerating housing delivery, resulting in either a housing site not activating or delivering housing at a slower rate than it would otherwise.

Longford County Council recognises that the Government's *Housing For All*, introduced in 2021, seeks to address these viability / affordability challenges and that it is proposed to review *Housing For All* after the publication of the revised NPF.

The context for housing delivery has changed significantly since previous peak deliver cycles and it is recommended that any review of *Housing For All* involves close consultation with all delivery actors – including local authorities, who have significant learnings arising from their housing and active land management activities.

### **3. Infrastructure for Growth Locations:**

In addition to the need to re-align spending profile, co-ordinated investment in infrastructure is also critical. The type and range of infrastructure that is required to be delivered has changed over the past two decades i.e. now including enhanced focus on public transport-oriented development, active travel corridors, public realm targeted to support high density growth patterns, nature-based infrastructure solutions, flood defences linked to the effects of climate change, and other environmental considerations.

The range of infrastructure providers has also increased over the past two decades. During previous growth periods local authorities were the primary infrastructure providers, however, there now exists a multiplicity of infrastructure delivery agencies.

Transport Orientated Development (TOD) is supported; however the concept needs to be applied outside cities and to support the active travel approach being developed throughout the country. There is potential to support TODs outside of Ireland's five cities and the NPF should provide for same where there is clear evidence that high frequency transport, in particular rail, exists to support TODs. NPO 10 essentially limits TOD to cities - a second tranche of TOD's should be highlighted within the revised NPF.

Key growth locations identified in local development plans to deliver NPF growth normally require the delivery of a range of supporting infrastructure and requires all infrastructure service providers to be aligned. In most instances, a key growth location can take years to move from the planning policy stage to the activation/delivery stages. In the context of Project Ireland 2040/NPF growth targets this requires the process to be accelerated.

Infrastructural investment outside Dublin needs to be adequate to facilitate balanced development but utilities to support that then need to be delivered in a coordinated manner.

Local authority experience is that greater alignment, agility, and coordination in terms of strategic policy development and investment planning across the range of supporting infrastructure providers will deliver improved outcomes.

#### **4. Renewable Electricity Capacity Allocation:**

NPO 75 whereby each Regional Assembly must plan for the delivery of regional renewable electricity capacity and identify allocation for each local authority based on regional renewable electricity capacity allocations as set out in Table 9.1 is noted. The successful implementation of this new process will require clear up-to-date guidelines for local authorities/regional assemblies relating to renewable energy and technical support. There is also a need for a clear roadmap and timeline for the DMAP process to plan for the ORE along our coast.

#### **5. Biodiversity:**

NPO 85 relates to addressing no net loss of biodiversity within plan making functions. However given the urgency in addressing Biodiversity Loss "No Net Loss" should be changed to "Net Biodiversity Gain". A detailed methodology needs to be developed to support the implementation of this goal (including the the 'green factor approach'), as—there is currently no mechanism in place which allows for no net loss of biodiversity. The UK has recently introduced a statutory requirement for net biodiversity gain in most planning consent applications. This is a very thorough and detailed metric which has been developed in the UK and which is utilised in this process. Without a similar metric it will be difficult to measure and ensure no net loss of biodiversity.

#### **6. Investment and Funding:**

The National Development Plan is the primary investment vehicle to deliver key enablers for change as set out in the NPF. A review of spending under the current NDP shows that proportional regional distribution of projected infrastructure investment does not reflect the growth targets of the NPF. There are significant spending pressures in the Dublin MASP area arising from population growth, resulting in planned investment allocated to the Dublin MASP being out of step with the other regions on an overall and per capita basis. The pressures that inform this spending comparison is understandable considering the Greater Dublin Area challenges in terms of providing adequate infrastructure for a population of over two million. However, unless comparable per capita *investment* is achieved in the regions and metropolitan areas outside of the east / Dublin, then achieving balanced regional development will be significantly challenged. Infrastructural investment outside Dublin needs to be adequate to facilitate balanced development but utilities to support that then need to be delivered in a coordinated manner.

Longford County Council acknowledges the positive impacts of the Government's multiple funding streams, each seeking to remove barriers to delivering growth in accordance with *Project Ireland 2040 / NPF* – such as, *Housing For All, URDF, RRDF, DCRD* schemes, economic development, transportation funding and many more. **A more streamlined, NPF focused funding apparatus tied to co-ordinated implementation structures / processes at the local level would assist significantly in achieving complementarity of investment and the delivery of NPF National Strategic Objectives.** To ensure improved alignment with the National Planning Framework and with the National Development Plan, consideration should be given to the development of these funding programmes into focused multi-annual funding streams to provide certainty of funding and to remove the competitive element contained within some of the current funding models.

## **7. Implementation:**

While specific implementation structures / processes are not set out in the draft revision of the NPF, this submission recognises and welcomes the revised NPF text on implementation. Implementation incorporates a 'whole of government' approach, with targeted and co-ordinated actions on housing delivery, alignment of all infrastructure actors, targeted and balanced funding.

All development that facilitates the NPF growth targets – population, employment, housing, transport, water services, public realm, etc. - is activated at the local / site level. Local authorities recognise the critical roles played by other agencies (both public and private) in delivering the NPF National Strategic Objectives, but also local authorities are well positioned to guide the delivery of actions at the local level in order to remove activation / delivery barriers. **It is therefore imperative that local authorities have a strong role in identifying any implementation structures and processes to deliver the NPF.**

This reflects a core recommendation of the OECD Report *'Towards Balanced Regional Attractiveness in Ireland: Enhancing the Delivery of the National Planning Framework'* (OECD 2023), which aims to support more balanced regional outcomes in Ireland:

*'Ireland is highly centralised and fast growing, creating coordination challenges in terms of delivering key investments and in key policy areas like transport, housing, and education. Actors across levels of government recognise a need for a more coordinated approach to the delivery of the National Planning Framework, the principal spatial planning strategy of Project Ireland 2040, which includes also the National Development Plan (public investment).'*

**Conclusion:**

Longford County Council recognises this strategy of balanced growth as a valuable and viable approach in seeking to address the challenges of continued accelerated growth in the east of the country and its impact on the growth of other locations nationally. Longford County Council also recognises the benefits arising from the creation of a spatial counterbalance within the State – a high performing capital, with high-performing regional counterbalances.

However there are areas of concern, and in this regard I ask that you take our comments into account in the 7 areas identified; Population Growth: Housing Delivery: Infrastructure for Growth Locations: Renewable Electricity Capacity Allocation: Biodiversity: Investment and Funding: and Implementation.

I hope the aforementioned submission meets with your favourable consideration.

Kind Regards,



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Paddy Mahon  
Chief Executive